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# Student Protection Plan

Holmes UK Holdings Ltd. UKPRN 10089691

comprising a network of:

- St Mary's University London International College, UKPRN 10083478
- University of Worcester International College, UKPRN 100834789
- University for the Creative Arts International College, UKPRN 10089687
- University of Bedfordshire International College, UKPRN 10089688
- University of Chichester International College, UKPRN 10089690

November 2021

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## The Student Protection Plan

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This is the Student Protection Plan for Holmes UK Holdings Ltd ('Holmes') covering the academic year 2021/2022 (September 2021 to August 2022). The Student Protection Plan sets out our arrangements for protecting the quality and continuity of study for our students.

## About Holmes

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Holmes Education Group (HEG) is an internationally recognised privately-owned multi-sector provider of education. HEG has had the same corporate directors since it commenced operations in 1986. We have teaching operations in Australia, the UK, Ireland, the USA, and Canada, but we also maintain permanent staff and offices in over a dozen other countries. As a multi-national provider of education, we hold accreditation with the Tertiary Education Quality and Standards Agency (TEQSA) in Australia, Quality and Qualifications Ireland (QQI), ACCET in the USA, and Ontario Ministry of Colleges and Universities in Canada). Each year we welcome over 15,000 students from around the world to our twenty unique campuses.

Holmes UK Holdings Ltd. is the legal entity for the HEG brand in the UK, and currently operates embedded college partnerships with five English universities:

University	Holmes Embedded College
St Mary's University <a href="http://www.stmarys.ac.uk">www.stmarys.ac.uk</a>	St Mary's University London International College (SMULIC) <a href="http://www.stmarys.ac.uk/smulic/home">www.stmarys.ac.uk/smulic/home</a>
University for the Creative Arts <a href="http://www.uca.ac.uk">www.uca.ac.uk</a>	UCA International College (UCAIC) <a href="http://www.uca.ac.uk/UCAIC/">www.uca.ac.uk/UCAIC/</a>
University of Bedfordshire <a href="http://www.beds.ac.uk">www.beds.ac.uk</a>	University of Bedfordshire International College (UBIC) <a href="http://www.beds.ac.uk/international/ubic/">www.beds.ac.uk/international/ubic/</a>
University of Worcester <a href="http://www.worcester.ac.uk">www.worcester.ac.uk</a>	University of Worcester International College (UWIC) <a href="http://www.worcester.ac.uk/about/academic-schools/university-of-worcester-international-college/home">www.worcester.ac.uk/about/academic-schools/university-of-worcester-international-college/home</a>
University of Chichester <a href="http://www.chi.ac.uk">www.chi.ac.uk</a>	University of Chichester International College (UCIC) <a href="http://www.chi.ac.uk/international/university-chichester-international-college">www.chi.ac.uk/international/university-chichester-international-college</a>

The courses we offer fall in to three main areas:

- Level 3 University Foundation programme, offered to students who fall slightly below the requirements to enter directly into a University, or whose English skills do not meet standard University entry requirements. Our Foundation programmes last for one or two semesters
- Level 4 First-Year programme, offered to students who would like or who require additional academic support to progress and succeed with their studies. Our First-Year programmes generally last for two semesters; and

- Level 6 Pre-Masters programme, offered to students with non-cognate degrees or to students who require additional academic support to complete a Master's degree. Our Pre-Masters programmes last for either one or two semesters.

All of our partner universities listed above are registered with the Office for Students (OfS) and have Student Protection Plans in place. These plans are made available to all current and prospective students through University and partner college websites. Details of the Student Protection Plans can be found here:

University	Student Protection Plan
St Mary's University	<a href="https://www.stmarys.ac.uk/student-protection-plan">Student Protection Plan (stmarys.ac.uk)</a>
University for the Creative Arts	<a href="https://www.ucreative.ac.uk/student-protection-plan">UCA Student Protection Plan for 2021-22 (ucreative.ac.uk)</a>
University of Bedfordshire	<a href="https://www.beds.ac.uk/media/4ltise3o/student-protection-plan-2020-21.pdf">https://www.beds.ac.uk/media/4ltise3o/student-protection-plan-2020-21.pdf</a>
University of Worcester	<a href="https://www.worcester.ac.uk/student-protection-plan">student-protection-plan (worcester.ac.uk)</a>
University of Chichester	<a href="https://www.chichester.ac.uk/student-protection-plan">University of Chichester Student Protection Plan 2021.pdf (d3mcbia3evjswv.cloudfront.net)</a>

## What is Covered by the Student Protection Plan?

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Examples of what **is** covered by our Student Protection Plan include:

- If we close a College/location at which your programme is taught
- If we discontinue your programme after you have enrolled with us
- If our partner University loses their UKVI Sponsor Licence, meaning we are no longer able to recruit international students
- If there is long-term disruption to your programme of study for any reason

Examples of what **is not** covered by our Student Protection Plan include:

- Short-term disruption to your programme (for example timetable changes, room changes, one-off cancellations)
- Minor changes to modules or programmes

### Overall Risk

Holmes has a strong financial base. In the UK, Holmes had a total turnover of £11,034,585 for the 2020 financial year, with net total assets of £4,395,740. We have the infrastructure and resources available to ensure that students can complete their studies with us and progress to one of our partner universities. We are a long-established global provider of education, with an excellent track record of providing good academic outcomes in partnership with our students and University partners. The risk that students may not be able to complete studies due to one of the issues arising above has been assessed and is **very low**.

We will make every possible effort to ensure that students are successful in their studies with the College. Once you have completed your studies and progressed to your partner University, you will then come under the Student Protection Plan of your partner University listed above.

### Specific Risks

Holmes has assessed the following potential risks to students not being able to continue or complete their studies with us:

#### **Closure of a programme – (moderate risk)**

Holmes operates in partnership with several English universities. Most universities in England undertake a periodic review of the programmes or courses offered to their students, and occasionally will suspend or close programmes. Universities will always consider the impact on students when they are considering closing a programme. In almost all cases we will enable you to complete your programme (this is usually referred to by universities as “teach out”).

Both Holmes and our partner universities have established plans in place to ensure that you are affected as little as possible by a programme closure – this includes maintaining staffing levels and the premises required to teach. Where we cannot teach out, we will discuss with you any opportunity to transfer to another programme offered by the College. If this is not possible, we will discuss with you the opportunity of transferring you to a very similar programme at another Holmes college and partner University. In these cases, we may consider offering you compensation for any actual financial loss you may suffer under our Terms and Conditions.

#### **Closure of a College (institutional failure) – (low risk)**

In very extreme circumstances we may need to close or cease operating one or more of our college locations. This could happen for several reasons, for example if our contract to operate is not renewed by our partner University or if we fail to meet regulatory obligations. If this happens, we will seek to close the College gradually, allowing all enrolled students to finish their studies at the College and progress to the partner University. The risk of this occurring is monitored frequently by our Senior Management Group in the UK. In the highly unlikely event of an immediate College closure, we would work with you to transfer your studies to another Holmes College and partner University, and may consider offering you financial compensation under our Terms and Conditions.

#### **Long term disruption to or closure of our teaching spaces – (medium to high risk)**

Long-term disruption to or closure of our teaching premises at our partner universities is unlikely, but is possible due to fire, flooding or other natural disasters for the risks related to the COVID-19 pandemic please see below). Where this happens, we will seek to move immediately to other appropriate premises at our partner university campus. We may also seek to hire premises outside of the University campus but located in the same town or city. This may involve changes to our timetable, and evening/weekend delivery. Where we cannot source appropriate alternative accommodation, we will discuss with our university partner and regulatory bodies the potential to switch to online delivery for a short period. If this is not possible, we will discuss with you the potential of transferring to another Holmes College and University partner. If this transfer results in financial loss to you, we may consider offering compensation under our Terms and Conditions.

Longer-term closure of our premises for the purposes of health protection (for example following Government orders to close buildings due to the COVID-19 pandemic) is now increasingly likely. In the event of a closure on public health grounds we will immediately switch to online delivery of our programmes. We have well-established plans in place to ensure this happens quickly and with little disruption to the learning outcomes of our students. The risk of students being unable to complete their programme of study is low due to the mitigations we have in place for online delivery.

### **Long term disruption to our teaching activities – (low risk)**

Our teaching could be disrupted due to industrial action, staff illness or the loss of key staff. Where this occurs, we will usually attempt to minimise the impact by making changes to our timetable or delivery. In very extreme circumstances we may need to suspend teaching or close a programme – although this action would only be taken as a last resort due to the impact on student visas and academic outcomes.

If we experience long-term disruption due to staffing issues, we will transfer staff from our other College locations or seek to recruit additional teaching staff from the partner university or other education providers in the local area. We may also implement changes to assessments (sometimes referred to by universities as a ‘no detriment’ policy) to ensure that we do not disadvantage students whilst maintaining learning outcomes and the academic integrity of our programmes. In the unlikely scenario that we need to suspend a programme we will support students in accessing or transferring to programmes offered by other Holmes colleges, including the transfer of credits achieved. Where appropriate we may consider offering financial compensation for any actual loss you have suffered.

### **Loss of a UKVI Sponsor Licence by one of our university partners – (low risk)**

Holmes does not hold a UKVI licence to sponsor students directly. Instead, our partner universities sponsor our students, usually for the entire duration of their programme of study in the UK. A University partner may lose their UKVI licence to sponsor new and continuing students for several reasons (for example a high number of visa refusals, a low completion or enrolment rate or failure to comply with other sponsor duties). This would mean the College and partner University would be unable to recruit new students and to continue to sponsor enrolled students. Both Holmes and our partner universities have very robust policies and procedures in place to ensure that we remain compliant with all aspects of immigration law (for example scrutiny of students at the application stage and attendance and performance monitoring of enrolled students).

In the very unlikely event that a partner university has their licence suspended or revoked, we will work closely with the partner university, the UKVI, UKCISA and other industry bodies to ensure that the impact is as low as possible. We will do this by (for example):

- Liaising with the partner University and the UKVI to allow you to complete your programme of study with the College
- Where possible, allowing you to enrol in the College to commence your studies if you are already in receipt of a student visa but have not yet enrolled
- Allowing you to defer your enrolment at the College at no cost, until such time as a licence suspension is lifted
- Offering you a full refund if you have not enrolled and decide you wish to study elsewhere
- Supporting you with an application to an alternative provider if you have already enrolled, including credit transfer arrangements

Where you have suffered actual financial loss due to the suspension or revocation of a sponsor licence, we may consider offering financial compensation to cover the amount of loss incurred.

### **Loss of accreditation of a programme – (low risk)**

Many of the programmes offered by our colleges and partner universities carry accreditation by professional, statutory, or regulatory bodies (PSRBs). It is possible that a PSRB may withdraw accreditation for one or more of our programmes of study at a partner University, meaning that students on that programme would no longer be eligible for chartered status.

Our partner universities liaise regularly with PSRBs to ensure compliance with teaching, assessment and other key practices required to maintain accreditation. In the event of a programme losing accreditation, we will offer students the opportunity to move to a similar programme which does hold accreditation. We may also deliver a modified version of the programme or, if appropriate, offer students the opportunity to transfer to another Holmes College and partner University which holds accredited status. Where this is not possible, we will support students in transferring to an alternative provider – in this case we may consider offering compensation for any demonstrable financial loss.

## Refunds and Compensation

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Holmes operates refunds and compensation policies which can be accessed [here](#). This policy is communicated to new students via email with their offer to study with us, and to continuing students through our website. Students accept the refund and compensation policies Terms and Conditions through accepting their offer to study with Holmes.

## Communicating with Students

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We will communicate with students regarding the Student Protection Plan by publishing this plan on our corporate and individual College websites. We will include a link to this plan in documentation when students accept their offer to study with us, and we will also include a link to this plan in programme handbooks.

In the event of components of the Student Protection Plan being instigated, we will communicate with students at the earliest possible opportunity. This will take place via email, announcements on our Virtual Learning Environment (VLE), class meetings and individual meetings with students.

We will always consult with students and take in to account their views before undertaking any major changes to our programmes, removing programmes, or closing one of our colleges. We will take all reasonable steps to ensure that students are able to complete their studies at one of our colleges.

## Approval Information

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This Student Protection Plan was approved by the Senior Management Group of Holmes UK Holdings Ltd. and is reviewed on an annual basis. The most recent date of review was November 2021 following external expert advice.

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