

### **Student Protection Plan**

City & Guilds of London Art School (the Art School) is a small not-for-profit specialist university sector college with independent charitable status. Established in 1879, it is one of the oldest institutions of its kind in the UK and offers undergraduate and postgraduate courses in Fine Art, Conservation and Carving as well as an intensive one-year Foundation Diploma in Art & Design. The Art School is recognised by a number of institutions and individuals who provide support for the Art School both financially through bursaries and scholarships, and through collaborations and partnerships. The Art School is committed to upholding its ethos and mission as an exemplary centre of excellence in Contemporary Fine Art, Historic Carving and Conservation. You can read more about the Art School's aims and purpose here.

The Higher Education and Research Act 2017 requires all Higher Education providers to maintain a **Student Protection Plan** in order to protect students' interests where a material change could threaten the continuity of their studies. This plan sets out an assessment of the risk of such significant changes occurring, and describes the measures we have taken to mitigate, reduce and manage those risks.

Students are also referred to the Art School's Student Contract. All measures contained in this plan are in addition to students' statutory rights, which remain unaffected.

This Student Protection Plan is maintained as part of our risk-management and business continuity planning activities. The management of risk at the Art School is the responsibility of the Audit and Risk Committee of the Board of Trustees, by delegation from the Board of Trustees. An institutional risk register is compiled and maintained by the Principal and the Senior Management Team (SMT) which makes regular reports to the Audit and Risk Committee. Since the SMT's membership includes all Heads of Academic and Professional Services departments, ongoing action plans to mitigate risk throughout the institution can be kept under constant review and any new risks or issues readily identified and acted upon in a joined-up, coherent and timely manner.

Assessments are made of the **likelihood** and **potential impact** of each individual risk through discussion within the SMT, with the Principal's opinion taking precedence in the event of disagreement. Likelihood and impact are each scored from One (minimal likelihood of occurrence/impact) to Five (high probability of occurrence/maximum impact); these scores are recorded on the Risk Register and are kept under review by SMT. The Audit and Risk Committee may subsequently override any assessment with its own opinion as to the level of risk.

The Art School is committed to communicating with students as early as possible any planned changes that may significantly impact upon the student experience and/or threaten the continuity of study. We are committed to consulting widely with the student body and the staff team about any planned measures and options available.

Communication will include any or all of:

- face-to-face meetings with student representatives;
- full meetings with affected cohorts of students;
- written communication by email using students' Art School email accounts and by letter.

Any measures we propose to take will be discussed and agreed with our educational partners; Ravensbourne University London for our validated BA (Hons) and MA courses, and the University of the Arts Awarding Body for the Foundation Diploma in Art & Design. Any course related changes will follow the procedures set out in our policies, regulations and agreements with Ravensbourne and UAL Awarding Body.

Furthermore, our commitment to students, as well as prospective students, includes the following:

- We will be transparent and open about any changes which could threaten the continuity of their studies, ensure that those students impacted are aware of changes in a timely manner and involve them in the process to make decisions on these changes;
- We will keep students and staff informed about developments related to any proposed changes through a dedicated section on the Art School website, regular email updates and face-to-face meetings (staff and student fora);
- We will take all reasonable steps to avoid any material change that could threaten the continuity of a programme of study taking place during an academic year, or close to the beginning of a new academic year;

- We will take all reasonable steps to ensure, in the first instance, that enrolled students can complete their course at the Art School within the agreed timescale;
- We will have processes in place, including agreements with our educational partners, to support a student to transfer to another provider, should a change mean the student cannot continue their programme of study;
- Where a change takes place before enrolment, we will also assist any
  offer holders on the programme in securing a place at another provider;
- We will provide appropriate compensation for additional costs incurred by students as a result of changes we make that result in their no longer being able to continue their course of study at the Art School;
- We will provide access to independent advice for students.

Please refer to the Art School's <u>Student Fees Policy</u> for guidelines regarding refunds of tuition fees in the event of material changes occurring which affect the continuity of study.

#### Review and dissemination

This plan will be reviewed every 12 months, as part of the Art School's institutional risk assessment process. The student body will be consulted about any planned revisions through the annual cycle of Student Representative Forum meetings.

A current version of the Student Protection Plan will be permanently available to all students on Moodle, as well as appended to each Department's Course Handbook. Hard copies will be available for consultation in the Art School Office and in the Library. An annual briefing on the Plan will also be given to Student Representatives.

#### Risks and the Plans to Protect Students

The following pages detail the risks that have been identified as potentially requiring mitigation via this undertaking.

### risk 1 Course closure

Likelihood of risk materialising: 1/5
Potential impact if risk were to materialise: 5/5

As a specialist, not-for-profit Higher Education provider the Art School has a long- standing commitment to its portfolio of courses. These are core to our mission and have been delivered consistently over many decades. They have developed through regular review processes to ensure their currency and relevance and are supported by a wide range of stakeholders who fund bursaries (on multi-year commitments) in order to support recruitment. The Art School has a robust recruitment strategy, which ensures that risks to recruitment are identified early. It is supported by a programme of marketing and profile-raising activities.

In the unlikely event of a course closing due to sustained under-recruitment all reasonable steps would be undertaken to minimise disruption for students enrolled on the course, by:

- Phasing out the course to allow students to complete their studies, paying due regard to maintaining the quality and standards of the student experience throughout;
- Offering a transfer to an alternative course;
- Working with the validating partner throughout to manage the closure process.

## risk 2 Major changes to course curriculum

Likelihood of risk materialising: 1/5

Potential impact if risk were to materialise: 4/5

The Art School is committed to deliver its programmes in accordance with the description in its course Handbook for the academic year in which a student began their programme. Any significant changes to course content will only take place after extensive consultation with all students affected and will not, as a rule, be introduced in-year.

In the event of a significant change, the Art School would:

- Restrict changes to the minimum, in order to maintain the quality experience;
- Fully consult with students about the changes to ensure the course offer remains acceptable;
- Offer students unwilling to accept the changes the opportunity to withdraw from the programme and transfer to another provider.

# risk 3 Disruption of course due to (temporary) loss of key specialist staff

Likelihood of risk materialising: 2/5

Potential impact if risk were to materialise: 4/5

Our specialist courses are delivered by a large faculty of sessional tutors, many of which are leading practitioners in their respective fields. Their teaching contracts require them to provide at least one full term's notice to allow a suitable replacement to be found.

The Art School has a strong and pro-active process to develop and nurture our network of specialist practitioners, including through institutional collaborations and partnerships as well as through our own alumni network. This provides a large pool on which to draw in the case of a temporary or permanent loss of specialist staff.

In case of an unexpected, sudden loss of staff where a permanent replacement cannot be identified immediately, we would:

- Seek a temporary replacement including working with our industry and academic partners and alumni;
- Make reasonable adjustments to the delivery of the course to ensure that the full curriculum is delivered, if necessary by altering the programme schedule in consultation with students;
- Where a replacement cannot be found in time, identify alternative external sources of teaching and arrange suitable access to these, at no additional cost to students affected.

## risk 4 Temporary closure of campus due to unexpected damage

Likelihood of risk materialising: 1/5

Potential impact if risk were to materialise: 5/5

The Art School operates from a set of historic buildings occupied on long lease arrangements from independent charity City & Guilds Art School Property Trust, and from the adjoining Old Vauxhall Telephone Exchange leased from BT. The Art School campus has been undergoing a programme of refurbishment in accordance with a masterplan established in 2009, two thirds of which has been completed with further work planned for the coming years. The Art School operates a strict site management regime with comprehensive fire safety arrangements, a storage strategy for volatile materials and safe working practice security measures in which all students and staff are inducted. The Art School also has in place a comprehensive insurance cover to safeguard business continuity.

In case of unexpected damage (eg, due to fire, flooding or other) requiring temporary closure of part of the campus, we would:

- Activate a business continuity plan, the cost of which will be supported through our business continuity insurance cover;
- Relocate teaching activity across the two sites in so far as possible;
- If necessary secure additional temporary space, wherever possible in close proximity to our main site; we have already identified an additional floor in the Old Vauxhall Telephone Exchange as a potential overspill space for a period of time; where relocation to a site further away is necessary, we will offer compensation for increased cost of travel in line with our compensation policy;
- Where disruption is significant and prolonged, we will support students through our student transfer policy where requested, and provide a refund of fees in line with our fees policy.

# risk 5 Temporary closure or relocation due to refurbishment programme

Likelihood of risk materialising: 2/5 Impact if risk were to materialise: 4/5

The Art School has been undergoing a phased programme of refurbishment of its main campus building since 2010, managed by City & Guilds Art School Property Trust. Wherever possible, work has been planned to coincide with the summer months to minimise disruption to teaching activity.

Where phases of work require temporary closure of buildings and facilities, we would make sure that:

- A comprehensive relocation plan is drawn up from the earliest project planning stages;
- Relocation takes place, in the first instance, by drawing on available spaces in the Old Vauxhall Telephone Exchange building nearby;
- Enrolled students, and prospective students, are informed about temporary closure and relocation plans at the earliest opportunity;
- Adequate resources are built into the project budget to ensure a smooth relocation and the provision of suitable alternative facilities during the building works;
- A Clerk of Works is employed to represent the interests of the Art School as tenant and will liaise with students and staff to ensure that disruption from building works is kept to a minimum.

#### risk 6 Withdrawal or non-renewal of course validation

Likelihood of risk materialising: 1/5

Impact if risk were to materialise: 5/5

The Art School has a track record of successfully managing its validation partnerships for the last 24 years. It has recently established a new validation partnership with Ravensbourne, for a five-year period, following an extensive due diligence process. The validation includes a commitment to teach out all students enrolled on a programme of study to its completion. The Art School is committed to a close working partnership with its validating partner, based on clear lines of communication. The maintenance of a well-documented quality culture and good working practices which are fully embedded also means that any due diligence on our processes would be facilitated in the event of the Art School needing to source a new validating partner.

Should course validation be withdrawn or not renewed, we would, paying due regard to maintaining the quality and standards of the student experience throughout:

- Teach out all enrolled students on the course, as per our validation arrangements with Ravensbourne;
- Suspend recruitment until a new validation partnership has been established.

# risk 7 Withdrawing of Designation for Student Support

Likelihood of risk materialising: 1/5

Impact if risk were to materialise: 5/5

The Art School has a track record of successful course redesignation for Student Support and has internal governance processes to ensure compliance with conditions of designation, and with the Office for Student registration.

In the event of withdrawal of course designation we would take all reasonable steps to minimise any resulting disruption to students by:

- Making use of the appeal procedures available;
- Working with the OfS to allow enrolled students to complete their course of study with Student Finance support;
- Where this is not possible, supporting students to transfer to appropriate programmes at other providers;
- Financially compensating students where they suffer demonstrable, material financial loss because of disruption to their studies in line with our compensation policy.

# risk 8 Suspension/Withdrawal of Student Sponsor license

Likelihood of risk materialising: 1/5

Potential impact if risk were to materialise: 5/5

The Art School has always successfully completed the annual renewal of its Student License and pays close attention to its full compliance with Student License regulations. A dedicated member of staff is responsible for monitoring any changes in requirements and responding to any queries arising.

In the event of suspension/withdrawal of the License, the Art School would:

- Teach out all enrolled sponsored students on the course in line with the UK Visas and Immigration (UKVI) policy;
- Work with the UKVI to seek reinstatement of our license;
- Support any enrolled students affected to transfer to an alternative sponsor should this be necessary;
- Ensure that students who have not enrolled and have not commenced their travels will be compensated for costs incurred and offered support to transfer their application to an alternative sponsor.

### risk 9 Institutional closure

Likelihood of risk materialising: 1/5

Potential impact if risk were to materialise: 5/5

The Art School has a track record of over 50 years as a not-for-profit institution, with consistent and growing support from a wide range of stakeholders which recognise our important role in providing specialist education unavailable elsewhere. We have operated throughout without recourse to bank lending and other forms of borrowing. The Art School's governance arrangements ensure financial oversight and the monitoring of institutional risk through the Board of Trustees. The Art School's reserves policy has a commitment to building free reserves to provide adequate working capital to protect the continuity of the Art School's activities. Business continuity insurance cover provides protection equivalent to up to 24 months' operating income in case of significant disruption of the Art School's business activity.

Where the Art School has no option but to close, it would:

- Where possible, close in a gradual way, over a period allowing current enrolled students to complete their studies;
- Where this is not possible or desired, support students to transfer to appropriate programmes at an alternative institution;
- Where appropriate, compensate students where they suffer demonstrable, material financial loss because of disruption of their studies in line with our compensation policy.