

**ISTITUTO MARANGONI LONDON
STUDENT PROTECTION PLAN**

ACADEMIC YEAR 2022-2023

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1. INTRODUCTION

Istituto Marangoni, the London School, delivers validated foundation, undergraduate and postgraduate education in 2022/23 via a collaborative partnership with Manchester Metropolitan University (ManMet) in subject areas that include fashion design, fashion styling, fashion business, jewellery design, interior design, product design and visual design. In August 2022, the London School agreed to terminate its partnership with Manchester Met with the last intake of new students enrolling onto Manchester Met programmes in February 2023. The London School is entering into a new validating partnership arrangement with Regent's University, London from September 2023, pending its DAP application outcome (submitted in July 2022).

In common with all other registered higher education providers, the London School is required to publish, maintain and update its Student Protection Plan as part of its registration with the Office for Students (OfS). This plan describes any potential risks to continuity of study, the measures in place to mitigate such risks, how the School communicates and reviews its plan and sets out its Refund and Compensation Policy and Complaints process. This Plan has been updated to reflect both the exit planning with ManMet (underway) and the new partnership arrangements with Regents University, London. This updated plan will ensure continuation of study and appropriate risk mitigation measures are in place for existing students enrolled on programmes leading to either a ManMet award or transferring to a Regent's University award in 2023/2024 pending the outcome of IML's own DAP application.

2. AN ASSESSMENT OF THE RANGE OF RISKS TO THE CONTINUATION OF STUDY FOR STUDENTS

The London School's most recent financial accounts demonstrate that the School is in a sound financial position with an overall income of £16,136.129 and pre- and post- tax profits of £5,268,520 and £4,196,118 (Istituto Marangoni Ltd Financial Accounts year ended 30th June 2021). The annual Financial Sustainability, Management and Governance return demonstrates credible and prudent financial forecasts with ongoing financial health generating a sizable surplus each year for reinvestment in learning resources and continuing to maintain sizable reserves. The School carefully manages student forecasts and associated investment year on year to enable sustainable and managed growth. The overall financial health of the School and its oversight of financial management and risk has also been independently verified through the independent, external financial audit undertaken each year. The risk therefore, that the London School is unable to continue operations is low. The risk that the London School will be required to close, or suspend delivery of, programmes is also deemed low.

Nevertheless, the London School mitigates against high impact risks such as: failure to meet required standards for UK higher education registration, Covid interruption, regulatory compliance or quality assurance standards, termination of ManMet partnership, loss of the School's UKVI sponsors licence, loss of building operations or estate or failure to deliver the validated academic portfolio. Furthermore, the London School Audit Committee monitors the School's overall financial health, overall academic performance, student learning experience and academic standards.

The likelihood that the London School may fail to meet required standards for UK higher education registration, regulatory compliance or quality assurance standards is low. Since 2016, the School has achieved successful outcomes for: OfS Registration (2019), Quality Assurance Agency HER Review (2016), Quality Assurance Agency Annual Monitoring (2017, 2018, 2019) and Manchester Met Partnership Review (2017). It has maintained compliance with all monitoring, assessment and data reporting requirements including UKVI BCA compliance (2016, 2017, 2018, 2019, 2020 and 2021), UKVI Tier 4 Compliance Visit (2019), Higher Education Statistics Agency submissions (2017, 2018, 2019, 2020, 2021), HESA Audit (2017), NSS participation (2017, 2018, 2019, 2020), DLHE (2016 and 2017), Prevent (2015-2020), OIA (2016-2021), Graduate Outcomes (2019-2021).

Following OfS registration and OfS confirmation that there is no cap on eligible student numbers accessing student loan support, including the designation of new courses, the likelihood that the London School may require further action to ensure compliance with government funded student loans control is low. No further action was required of the London School.

The risk that the collaborative agreement and validating partnership with ManMet (first established in 2011) will be terminated by ManMet in advance of the expiry of the end of the contract (from Aug 2023), impacting upon students on programmes leading to ManMet awards is low. This assessment is based on our successful partnership over the years, including its institutional renewal in 2017, validation of new programmes between 2018-2021.

The existing agreement(s) between the London School and ManMet provide a clear legal framework governing any notice or teach out periods to ensure all students will continue to be supported to enable them to complete their programmes.

In August 2022, the London School took a strategic decision to terminate the partnership with ManMet whereby 2022/23 would be the last intake of new students. The London School has entered into a new validating partnership with Regent's pursuant to which all new students enrolling with the London School from September 2023 will study for a Regents University award. The risk to continuity of study for existing students enrolled with ManMet remains low because both parties remain committed to maintaining continuity of study through the implementation of an agreed exit plan that makes provision for student choice and/or 'teach out' to enable students to complete their award. This exit plan also enables eligible students to choose to transfer to the equivalent programme at Regent's University without disruption from Sept 2023 subject to completion of the relevant academic credits. Similarly, deferred students and students resitting or repeating the year will be given appropriate alternative offers with Regent's University (at Istituto Marangoni London).

Similarly, the risk that the new validating partner, Regent's University is likely to terminate the agreement unilaterally remains low, with both parties being strategically committed to the partnership following full due diligence reviews and approval from their respective governing bodies. This is because the London School has a successful track record in maintaining academic standards, quality and compliance with the requirements of awarding bodies within its existing validating partnership and plans for this to continue into new partnership with Regent's University. In the event of this risk, both parties confirm that the interest of students would remain paramount and students would be enabled to complete the programme onto which they have enrolled. The terms of the signed MoA provide a clear framework for any exit arrangements, including making provision for the London School to terminate the Agreement early following the acquisition of DAPs. The agreement includes a commitment from both parties to support student choice to support its students, where required during any 'teach out' period, to complete their approved, validated programme. On the acquisition of DAPs, student choice would be paramount to ensure continuity of study will be maintained by enabling continuing students (where required) to remain enrolled in a Regent's University until completion of their award.

In June 2022 the London School Board of Directors confirmed approval to progress the application for Taught Degree Awarding Powers (TDAP) through the OfS. Changes to the London School Governance structure have been made in March 2022 to prepare the London School for its TDAP application and a Self-Assessment Document with associated appendices have been prepared for detailed scrutiny by the Quality Assurance Agency (QAA). The London School has discussed with senior personnel in ManMet about the School's application for TDAP and a TDAP Academic Partnership IML-MMU Steering Group has been set up to monitor the TDAP application process and ensure a smooth transition for students. Both institutions will ensure that all students enrolled on validated programmes at the time a

successful outcome is achieved by the London School will be given the opportunity and are supported to complete their chosen pathway of study.

If the London School achieves success in its application for TDAP it will mean that, in the first instance, TDAP will be granted for an initial period of three years. The London School would apply for permanent TDAP at the end of this initial period providing continuity for students enrolled on the London School's own programmes. The London School does acknowledge there is a risk that the OfS may not approve the School's application for permanent TDAP at the end of the initial three-year period or that such powers could be lost during the probationary period. The School does not however believe this risk to be any greater than low as it is committed to invest and support staff and students to be successful in the transition to becoming a TDAP institution. The London School has committed to a TDAP Implementation Plan and associated Risk Register over a five-year period (2022-2027) to ensure that risks are monitored and appropriate action taken to reduce them. Mitigation of this risk is detailed in the next section of this plan and makes provision for transfer arrangements to specific provider(s).

Following the successful UK Visa and Immigration (UKVI) Licence Renewal (for 4 years) in 2021, the School has an established track record of compliance with the terms of its UKVI Sponsorship Licence, including its monitoring and reporting requirements via the Sponsorship Management System (SMS). The School continues to maintain a low refusal rate and undertakes regular internal audits to ensure its record keeping is compliant with UKVI requirements. When confirmed as being an institution with the status of being a higher education provider with a track record of compliance (2019), the School's students became eligible for the right to work during study for visa students who have enrolled to degree programmes at RQF 6 or 7 after 1 August 2019, are able to work 20 hours per week during term time and full-time during vacations (RQF 3 students are able to work up to 10 hours per week during term time and full-time during vacations). Whilst it is recognised that the impact would be significant, the risk that the London School will be unable to offer student visa sponsorship for International students is very low.

The likelihood that the London School will no longer be able to deliver programmes at our Fashion Street site is deemed low due to length of previous tenancy (15 years, since School opening in 2003), recent (2016, 2017 and 2020 building extension) School renovation (ensuring estate development, building operation and building control compliance) and lease renewal (2019), however the impact of loss of building operations or loss of access to site is understood as moderate. Since its opening, the School has successfully operated from the site, with tenancy and building compliance, continually investing in the premises, improving academic and social facilities for students, and maintains a healthy annual capital expenditure budget. Building occupancy has been fully modelled for planned, sustainable student number growth, with related architectural and estates development plans for the next three years in place.

In the event of disruption caused by a major localised incident (such as flood or fire) or a major local, national or global incident the School will take appropriate steps to maintain continuity of study while also complying with all relevant government, legal and sector regulatory requirements. In such instances, the School will not change the content or academic standards of the programme although in some instances it may involve a material change to the mode or pattern of programme delivery.

The likelihood of impact upon student protection, should the London School not be able to deliver specific Foundation, BA (Hons) and MA course titles in the next three years is very low, given clear pathway operational planning thresholds and timescales and applicant designation for named awards, providing resourcing and progression/ completion certainty.

The risk that the London School is no longer able to deliver material components of approved and validated courses is low because the School units and courses have been designed to be taught by integrated teams of academic staff, with professional currency and academic expertise. Throughout the Covid-19 pandemic during 2019/2020 and 2020/2021 the School put in place appropriate measures to

maintain delivery of the material components of all its approved and validated courses and the risk of not being able to do so in the future remains low. The School returned to face to face delivery throughout 2021/2022 combined with access to hybrid delivery where specific students still required remote learning to maintain continuity of study still subject to Covid-19 travel restrictions in their home country.

The likelihood that the London School is not able to deploy adequate expert staff or tutors within specific courses is very low given the use of visiting tutors/ visiting senior tutors widely available close to the School's location (central London) due to the proximity of other subject-related higher educational institutions.

3. MEASURES IN PLACE TO MITIGATE RISKS

We believe that there is minimal risk to the continued delivery of the School's validated programmes, and therefore minimal risk to the continuation and completion of study for students. However, in the event of the risks noted below crystallising, measures would be activated as follows:

The London School remains committed to supporting student choice through maintaining continuity of study for students (where required) currently enrolled or commencing study in 2022/2023 to complete their programmes either as part of a formal 'teach out' arrangement with ManMet agreed as part of a detailed exit plan or alternatively to transfer to an equivalent programme awarded by Regent's University pending its DAP application outcome (submitted in July 2022).

In the unlikely event that the London School was unable to continue operating approved programmes, through termination or withdrawal of the partnership agreement by the validating partner, the interest of students would remain paramount and students would be enabled to complete the programme on to which they have enrolled. The London School and the relevant partner (ManMet) or Regent's University would support its students (where required) during the 'teach out' period, which would usually be until enrolled students have completed their approved, validated programme. The School and the validating partner will also make sure to provide appropriate opportunities for transfer to other relevant programmes, including to IMLs DAP award (pending application outcome). In the case of students studying validated higher education provision at the London School; to programmes offered at the degree awarding partner ManMet, Regents University, IML (pending DAP outcome) or elsewhere. In each instance, the School will make sure to offer appropriate compensation for students who have suffered a material, financial loss as a result and in accordance with the applicable terms and conditions.

If the London School becomes unable to offer government-funded student loans, the London School will put in place a targeted UK student scholarship scheme (in addition to its existing student scholarship scheme) to support applicants' access to the School and to protect continuation of their studies once enrolled on the programme.

If due to estate or building operation, the London School was unable to deliver programmes at our Fashion Street site, first of all, it would seek to ensure not to close the building while the academic period (teaching session) was underway. In the case of any unexpected emergency events or force majeure, the London School would ensure to inform students as early as possible by providing detailed information about other suitable premises location, moving programme delivery within alternative estates, where arrangements were deemed to be fair and reasonable. In response to Covid-19, the School implemented a transition to hybrid blended learning following the temporary closure of its buildings during the pandemic. The School reverted back to face-to face during the 2021/2022 academic year, while maintaining social distancing and following all relevant government, and public health regulations. Specific students continued access to their courses /hybrid learning where this was necessary to maintain continuity of study in response to Covid-19 travel restrictions.

If the London School is unsuccessful in extending its TDAP beyond the initial three-year period, it has identified that this risk, while being small, would mean and students enrolled on the London School's

degree programme over the initial three-year period and who have not completed their chosen pathway of study, would need to be offered an alternative solution to ensure they complete their studies. The London School in such a low risk would mean that they would seek transfer to the validating partner and ensure an appropriate extension of its partnership agreement with Regent's University or a suitable alternative. In such an instance Regent's University would be the obvious initial choice, though the London School does have relationships with other providers, not least through their membership of the Guild HE and CHEAD network of institutions, who could validate London School degrees in fashion, design and business, if required. Further mitigations of this risk includes the financial strength of the London School and being part of a global education group and the creation and ongoing monitoring of the School's TDAP Implementation Plan to ensure it continues to meet the criteria required of a TDAP institution.

In the unlikely event that the London School was unable to offer student visa sponsorship for International students, it will work closely with UKVI to allow its students to complete their current year of study. The School will also ensure the provision of appropriate transfer opportunities making sure to offer appropriate compensation for students who have suffered a material, financial loss as a result and in accordance with the applicable terms and conditions. In cases where applicants have not yet started their programme, the London School will contact them as soon as possible and offer a study suspension or transfer opportunity. To mitigate against any impact in response to the impact of deferrals from EU students the School successfully obtained a significant increase in its overall CAS allocation to maintain student recruitment and preserve continuity of study.

If the London School decided to suspend the delivery of validated programmes due to operational thresholds, it would be sure to communicate to all applicants and students in a timely manner assuring them that they will be able to continue their studies on an equivalent programme or provide an opportunity to transfer to other relevant validated higher education programmes at its degree awarding partner Man Met or elsewhere, making sure to offer appropriate compensation for students who have suffered a material, financial loss as a result and in accordance with the applicable terms and conditions.

If the London School were unable to deliver material components of validated programmes during the designated academic period, the London School would put in place suitable alternative arrangements (agreed with the relevant awarding body: ManMet or Regent's University). Students/ applicants affected would also be considered for compensation in accordance with the applicable terms and conditions. Major and material changes to programmes would not normally take place in-year and would apply to the next cohort of students. Applicants are always informed of any material changes in sufficient time to be able to consider if they wish to change their choice of programme and/or withdraw their application at any stage in the admissions process.

Where it is necessary to make material changes students will be consulted about these changes and both applicants and students will be informed of such changes prior to their implementation. In response to local, national or global incidents it may, however, in some cases be necessary to make material changes to programme delivery in order to maintain continuity of study.

The School remains committed to recruiting, supporting and maintaining a diverse student and staff population consistent with its international and global identity. Its commitment to retain its European student and staff population remains equally strong. To mitigate against a potential fall in student or staff recruitment the School developed a clear strategy for ensuring that the terms of the EU Settlement Scheme were communicated and understood by eligible staff and students. Clear and accessible information for applicants and prospective applicants also ensures they understand what they need to do when applying to study in the UK. Applicants, prospective applicants and students are supported and receive timely information and advice by the admissions and student services team as appropriate. Similarly, members of staff received clear information on how to apply through the EU Settlement Scheme with support from the Human Resources Department which enabled the School to retain its entire workforce. The School is committed to ensuring that job applicants from the EU continue to be considered

on their merit and receive information and support on what they need to do to qualify to work in the UK.

4. INFORMATION ABOUT REFUND AND COMPENSATION POLICY

The School ensures that applicants as well as students are fully aware of the terms relating to the refund of tuition fees and other relevant costs paid, which are stated in our terms and conditions (T&Cs). The T&Cs are provided to applicants during the early stages of the application and enrolment process, and to current students annually during the re-enrolment process through the admissions portal. The T&Cs make explicit that the School will refund the enrolment fee as well as any other fees paid to the School under our contract if:

- The School does not accept a student's application;
- The applicant cancels a place on the Programme within the requested time frame;
- The School terminates the contract because of the applicant not being able to meet the relevant English language requirements;
- The applicant's visa application is not granted;

The T&Cs also make explicit applicant and students' rights with regard to:

Refunds

- Conditions where students who pay their own tuition fees are eligible for refund;
- Conditions where students in receipt of a tuition fee loan from the Student Loans Company are eligible for refund;
- Conditions where students whose tuition fees are paid by a sponsor are eligible for refund;
- Conditions if the school were unable to maintain continuity of study in response specifically to Covid-19 disruption as well as more generally;

Compensation

- Conditions where the payment of additional travel costs for students affected by a change in the location of their course are eligible for compensation;
- Conditions where the School commits to honour student bursaries;
- Conditions where compensation for maintenance costs and lost time due to the School's inability to preserve continuation of study;
- Conditions where students are required by the School's inability to deliver, to transfer courses or School are eligible for compensation of tuition and maintenance costs.

The T&Cs also set out the steps the School will take to minimise any disruption in response to events outside its own control that may hinder or delay students' access to services, teaching or facilities. The School also offers a range of options including the option to defer, initially study online or in specific cases to claim a refund. These terms and conditions have been accordingly updated for new entrants in 2022/2023 and returning students to reflect the students' contractual terms.

With regard to assessed marginal risk of non-continuation of study; the London School's most recent financial accounts demonstrate that the School is in a sound financial position. In addition, students are required to pay tuition fees for the year in full prior to starting/ continuing their programme. As such, the School is in a strong cash position at the beginning of each academic year and also benefits from having significant financial reserves that will enable it to meet any financial obligations in relation to refunds or compensation to affect students.

5. COMMUNICATION

The London School publishes the Student Protection Plan on the School's website and it is uploaded on the School's student intranet.

In advance of each new academic year, all staff will be made fully aware of the Student Protection Plan and their responsibilities within that, particularly with regard to implications arising from proposed changes or modifications to validated programmes.

The London School will make sure to engage with, and subsequently give reasonable notice to, students and applicants when the School needs to make material changes to their programme. All changes will be identified ahead of prospectus printing, where possible, and the School's website will be updated within 10 working days after changes have been formally approved.

If the School needs to implement the measures in our Student Protection Plan, we will institute a dedicated hotline, email, FAQ and drop-in support service (including academic and professional service staff and independent advice) to support students collectively and individually. Alongside this, the School will seek to support student transfer arrangements as applicable (with our partners, other local UK Higher Education providers or internally, across the global network of Istituto Marangoni Schools, in line with student choices).

6. REVIEW OF THE PLAN

The London School reviews the Student Protection Plan annually via the Academic Board, the Audit and Risk Committee and, ultimately, the Board of Directors. Student Representatives participate in the annual review, as well as the appointed Academic Student Governor. In addition to this, the School will inform students if there are to be material changes to their programme, communicating with current or prospective students through the Admissions Team (applicants) and Quality Assurance Office (enrolled students), ensuring appropriate advice is provided so that students can make informed decisions on the continuation of their studies.

7. COMPLAINTS

In case students are not happy with the content provided, they can raise a complaint using Istituto Marangoni London Student Complaints Procedure available here.

8. DOCUMENT REVISION

Document	IM London School OfS Registration, Condition C3
Approved by	Academic Board Audit and Risk Committee Board of Directors
Approved date	2nd September 2022

