

**ISTITUTO MARANGONI LONDON
STUDENT PROTECTION PLAN**

ACADEMIC YEAR 2018 – 2019

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1. INTRODUCTION

Istituto Marangoni, the London School, delivers validated undergraduate and postgraduate education (via collaborative partnership validation agreements with Manchester Metropolitan University (Manchester Met) in fashion design, fashion styling and fashion business. From academic year 2018/19, the School plans to extend its portfolio to include interior design, visual design and product design (subject to validation). The London School also has a Collaboration Agreement with Study Group (Bellerbys Educational Services Limited) who deliver a Foundation programme onsite at the International Study Centre (ISC) also located at our Fashion Street site.

The London School remains committed to ensuring all students are protected for the duration of their studies.

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. The annual Financial Sustainability, Management and Governance return demonstrates credible and prudent financial forecasts with ongoing financial health. The School carefully manages student forecasts and associated investment year on year to enable sustainable and managed growth. 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, for example: failure to meet required standards for UK higher education registration/designation, regulatory compliance or quality assurance standards, termination of Manchester Met partnership, loss of the School's UKVI high trusted visa sponsorship status, loss of building operations or estate, termination of Study Group partnership or failure to deliver the validated academic portfolio. Furthermore, the London School Audit Committee monitors the School's Risk Register, which assesses risk wholly, at an institutional level.

The likelihood that the London School may fail to meet required standards for UK higher education registration/ designation, regulatory compliance or quality assurance standards is low. Since 2016, the School has achieved successful outcomes for: DfE Re-designation (2016, 2017 and 2018), Quality Assurance Agency HER Review (2016), Quality Assurance Agency Annual Monitoring (2017 and 2018), UKVI BCA compliance (2016, 2017 and 2018), Higher Education Statistics Agency submission (2017 and 2018), HESA Audit (2017), NSS participation (2017 and 2018), DLHE (2016 and 2017), Prevent (2015, 2016 and 2017), OIA (2016 and 2017), E&Y financial audit 2016 (2017 awaiting final sign off), Manchester Met Partnership Review (2017) and Study Group Collaborative Agreement renewal (2017).

Following previous Higher Educational Statistics Agency returns (notified by the London School to HEFCE and SLC 2015, 2016) which signalled a minor deviation from the SNA (2015, 2016), the likelihood that the London School may require further action to ensure compliance with government funded student loans Student Number Allowance (SNA) control is moderate. No further action was required of the London School; however to mitigate against this risk in 2017/18 the School convened the Student Loans Working Group that reports to the School Board and the Audit Committee ensuring this area is closely monitored and to provide additional institutional assurance.

The risk that the collaborative agreement and validating partnership with Manchester Met (first established in 2011) will be terminated in advance of the next contract renewal date (2023), impacting upon undergraduate and postgraduate awards given by Manchester Met is low, given the recent successful renewal of our Institutional Partnership (undertaken in 2017 and valid for 6 years), our successful BA (Hons) revalidation (and associated agreement (renewed in 2017 and valid for 6 years), our successful MA revalidation (2018) with associated agreement currently under finalisation (May 2018) and upcoming subject development (Design) and associated validation (May 2018), all undertaken with the full support of Manchester Met.

Following successful UK Visa and Immigration (UKVI) Licence Renewal (for 4 years) in 2017, annual renewal (2018), Basic Compliance Assessment (BCA) statistics (from 2016-2018) continuing to operate well within threshold targets (refusal rate of 0.6%, enrolment rate of 100% and completion rate of 97%) and clear Sponsorship Management System (SMS) reporting compliance and monitoring, whilst it is recognised that the impact would be significant, the risk that the London School will be unable to offer Tier 4 highly trusted status 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) School renovation (ensuring estate development, building operation and building control compliance), 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. The tenancy is due for renewal in August 2019 with leasehold negotiations prepared for, commissioned and underway in a timely fashion.

The risk that the collaborative agreement with Study Group partnership (first established in 2012) will be terminated in advance of the current term (valid until September 2019) is low, with no likely impact upon student application, enrolment or continuation. The current Foundation programme is under periodic review with an active academic collaboration underway. Strengthening of the current collaborative agreement to enhance partnership operation is also underway (expected to conclude by July 2018).

The likelihood of impact upon student protection, should the London School not be able to deliver specific BA 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. 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 very unlikely event of the risks noted below crystallising, measures would be activated as follows:

In the unlikely event that the London School was unable to continue operating approved programmes, 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 partner (Manchester Met and Study Group) would support its students during the 'teach out' period, which would usually be until all enrolled students (Manchester Met and Study Group) have completed their approved, validated programme. The School would also make sure to provide appropriate opportunities for transfer to other relevant programmes. In the case of Study Group students; to programmes offered elsewhere by Study Group or at a similar provider. In the case of students studying validated higher education provision at the London School; to programmes offered at the degree awarding partner Manchester Met, 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 became unable to offer the current SNA allocation (50) of 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 the unlikely event that the London School was unable to offer Tier 4 visa sponsorship for International students, it will make sure to work closely with UKVI to allow its students to complete their current year of study. The School will also make sure to provide appropriate transfer opportunities (as listed above in relation to the relevant partner provider) 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.

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 Manchester 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 Manchester Met). Students/ applicants affected would also be considered for compensation in accordance with the applicable terms and conditions.

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

Additionally, the School is implementing a review of its terms and conditions for implementation for launch in the academic year 2018/19) with a view to including:

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;

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 School will have concluded this review and published the revised terms, and/ or a stand-alone refund and compensation policy, no later than 31 August 2018.

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 therefore could provide refunds or compensation to affected students.

5. COMMUNICATION OF PLAN

The London School will publicise the Student Protection Plan to current and future students by October 2018. The plan will be published on the School's website, included in admissions interviews, and uploaded to the School's student intranet. It will also be discussed with the Student Representative body during the Induction sessions.

In advance of academic year 2018/19, 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 review the Student Protection Plan annually by October via the London School Board, the Audit Committee and, ultimately, the Board of Governors. Student Representatives will be involved in this annual review, as will the appointed Student Governor (during 2018/19). In addition to this, the School will make sure to 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.

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, and the School's website and UCAS pages 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. DOCUMENT REVISION

Document	IM London School OfS Registration, Condition C3
Approved by	Chair of Audit Committee
Approved by	School Director/ Board of Directors
Approved date	23 May 2018