STUDENT PROTECTION PLAN

<table>
<thead>
<tr>
<th>Author</th>
<th>School Registrar (Belinda Flaherty)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reviewed:</td>
<td>Academic Board: 25th July 2018</td>
</tr>
<tr>
<td>Next Review:</td>
<td>Academic Board: 24th July 2019</td>
</tr>
</tbody>
</table>
1.1 This plan lays out the policy and procedures that the AA School will follow to ensure the continuation and quality of study for all students of the AA School in the case of any material change.

1.2 For the purpose of this plan, material change is identified as the following (but not limited to):

- the suspension or closure of a course or programme
- Premises closure (whole or part of the buildings/premises)
- Suspension or removal of Tier 4 Sponsor Licence
- Withdrawal of designation for student support purposes
- Loss of accreditation
- School closure (institutional failure)

1.3 For the purpose of this plan, the academic organisation of the AA School is confirmed as follows. The policies and procedures as laid out in this plan apply to all students registered therein:

- A one-year Foundation Course for students contemplating a career in architecture or related arts subjects;
- The undergraduate course offering the five-year Architect's Registration Board (ARB) prescribed and Royal Institute of British Architects (RIBA) validated full-time course in architecture comprising the AA Intermediate Examination providing exemption from ARB/RIBA Part 1 after 3 years of full-time study and the AA Final Examination providing exemption from ARB/RIBA Part 2 after 2 years of full-time study. The AA's own academic qualification – the AA Diploma, first awarded in 1920 – is achieved upon successful completion of Years 4 and 5 of study;
- The postgraduate provision comprising ten distinct programmes of advanced full-time studies. The AA is a Partner Institution and Affiliated Research Centre of the Open University. All taught postgraduate degrees of the AA are validated by the OU and the OU is the awarding body for research degrees at the AA;
- The AA Professional Practice and Practical Experience Examination leading to exemption from the ARB/RIBA Part 3 Examination, the entry requirement to professional registration as an architect.

1.4 The AA School commits to taking the following measures to inform and protect all students registered on these courses/programmes of study:

- Communicating any changes to students as early as possible with precise information and a clear articulation of all options;
- Consult with students and invite student representation in the decision making process;
- Take all reasonable steps to minimise disruption.

1.5 The Senior Management Team (SMT) and the Audit & Risk Committee of Council monitor the AA's Risk Register, which synthesises the range of risks to the institution. The level of risk for each item is reviewed and agreed and action defined to mitigate the risk.

1.6 For the purpose of this plan, the following scenarios are presented. These should not be assumed as likely occurrences but present possibilities that help define response and expectation.
2 Potential risks to students

2.1 The suspension or closure of a course or programme

2.1.1 Level of Risk: Moderate
The AA School may make a strategic decision to close a course or programme because of declining student numbers, the departure of key staff, replacing an existing course/programme with a new one, changing strategic priorities, or concerns about the quality and academic standards of the course/programme resulting from periodic review. The AA School commits to a ‘teach-out’ policy in all such circumstances to support minimal impact to students.

2.1.2 Mitigating the risk
In the approval process for a new course/programme, a range of assessments are carried out in order to mitigate against closure at a future date. These are:
- analysis of existing markets;
- recruitment strategy;
- assessment of effect on other programmes and relevance of proposal to the institution’s development;
- assessment of financial viability and resource implications.

The AA School’s internal annual monitoring procedures allow the AA School to monitor and manage any early indicators of a risk to the feasibility of a course/programme, including falling student numbers, falling academic standards and negative student/staff feedback.

The AA School’s continuous annual monitoring with its validating partners allows them to flag up any issues or concerns they have before they escalate.

2.1.3 Protection for current and prospective students
In considering whether to close a course/programme, the AA School will consider the arrangements from the perspective of the current students and prospective students:

- Where a decision has been taken to close a course/programme, the AA School will commit to the existing student/s the opportunity to continue as planned and be ‘taught-out’ on the original course/programme to the expected completion date; any extenuating circumstances preventing a student from completing by the expected date will be considered on a case by case basis;
  - In the unlikely event that the AA School is unable to provide a teach-out option for the course/programme (for example: if a member of the faculty leaves and the AA School is unable to find specialised replacement academic staff) the student will be assisted in transferring to an alternative course externally with compensation for any student who suffers demonstrable material financial loss because of the disruption;
- Where a decision has been taken to close a course/programme, the AA School will commit to relay this information to the prospective student/s as early as possible and to offer the opportunity to transfer their application to an alternative course/programme of study subject to entry requirements. Any prospective student who has accepted an offer of a place to study at the AA School will be given an option to withdraw, with a deposit reimbursement, if an alternative course is unsuitable.
2.2 Premises closure (whole or part of the buildings/premises)

2.2.1 Level of Risk for closure of whole of the premises: low
Level of risk for closure of part of the premises: moderate
The AA School owns its premises in Hooke Park, Dorset but the premises in Bedford Square and Morwell Street are primarily occupied on lease arrangements. Negotiation to maintain rents at manageable levels is a primary strategy of the organisation.

The risk of unplanned events such as flood, fire or safety issues can lead to premises closure and the Senior Management Team, which includes the Head of Estates, would seek to mitigate disruption.

2.2.2 Mitigating the risk
The AA sees its current London location as one of its key features and has invested heavily in the development of the buildings in Bedford Square. Regular meetings are held with Bedford Estates to support the most constructive and beneficial working relationship between the parties.

The AA’s Estates & Infrastructure Committee and the School’s Estates & Facilities Department ensure that all premises and facilities are fit for purpose and compliant with all regulations regarding buildings and health and safety issues.

2.2.3 Protection for current and prospective students
Where any part of the AA premises (32-39 Bedford Square, 4 and 16 Morwell Street, Hooke Park) is rendered unusable for usual activities, the AA School will invoke its Business Continuity Plan and take consideration of the following options:

- relocating to alternative premises, location and/or investigating temporary building structures with due consideration to travel and accessibility;
- review and revision of the timetable to enable scheduled teaching to take place in alternative premises; this may involve teaching outside of published teaching hours;
- delivering teaching via alternative means: on-line, remote access.

Prospective students will be informed of any changes to the location of the course as soon as possible and all course information on the website will be updated to reflect any change in location.

2.3 Suspension or removal of Tier 4 Sponsor Licence:

2.3.1 Level of Risk: Low
The AA School’s Tier 4 license could be revoked if the AA fails to comply with UKVI requirements, or the requirements of any of the following bodies:
- Office for Students
- QAA
- HESA
- Department for Education

2.3.2 Mitigating the risks
The School has maintained its UKVI Tier 4 licence since 2010 and has continuously positive rates as demonstrated by the annual Basic Compliance Assessment (BCA)
results. All core requirements have been met and passed. The AA School’s Compliance team regularly review UKVI regulations and inform the necessary departments of changes as and when required.

The AA School has received positive reports from the QAA since its first engagement with educational oversight in 2012. The School is preparing to register with the Office for Students in August 2018 and is confident that it can fulfil the ongoing requirements of registration detailed in the Regulatory Framework (including regular submission of data to HESA).

2.3.3 Protection for Students
Should the Tier 4 Sponsor status be suspended, the AA School will take all reasonable steps to support the affected student/s by:
- working with UKVI to allow enrolled students to complete their course/programme of study;
- permitting students already in receipt of a VISA based upon an allocated CAS from the AA School to enrol and commence their studies;
- offering students who have not commenced their travel or relocation to the AA School the opportunity to postpone their application pending the resolution of the suspension.

Should the Tier 4 Sponsor status be revoked, the AA School will take all reasonable steps to support the affected student/s by:
- appealing the decision and making a new application for a Tier 4 license as a matter of urgency to restore full services as soon as possible;
- where Tier 4 regulations permit, to seek the transfer students to an approved alternative sponsor.

Refunds and compensation will be reviewed on a case by case as detailed in section 3 below.

Communication will be maintained with students and prospective students regarding any changes to the AA School’s Tier 4 License. The AA School website and all materials will be updated immediately to inform prospective students.

2.4 Withdrawal of designation for student support purposes

2.4.1 Level of Risk: Moderate
The AA School has designation for student support purposes (SLC funding) for the 2018/19 academic year. The School will be applying to Office for Students for the first time in August 2018 to be included in the Approved Category of the HE Register and allowing designation for student support for the 2019/20 academic year. This risk is assessed as moderate, as this is the first time that the School is applying for recognition with Office for Students and it is an entirely new set of requirements.

The Department for Education made a condition in 2015, that in order for the AA School to maintain its designation for student support, it must continue to work diligently to secure Taught Degree Awarding Powers (TDAP). The scrutiny of the AA’s application is in its concluding stages and it is anticipated that the Advisory Committee for Degree Awarding Powers (ACDAP) will consider the report and recommendation of the QAA Scrutiny Team in May 2019.
2.4.2 **Mitigating Risk**

The AA School is preparing to register with the Office for Students in August 2018 and is happy that it can fulfil the ongoing requirements of registration detailed in the Regulatory Framework (including regular submission of data to HESA).

The AA School is diligently working towards achieving Taught Degree Awarding Powers and with primary focus on meeting the criteria for TDAP.

---

2.4.3 **Protection for Students**

Should the AA School lose specific designation for student support purposes all reasonable steps will be taken to support affected student/s by:

- working with relevant funding and regulatory bodies to allow registered students to complete their course/programme;
- should this not be possible, support students in their transfer to an appropriate course/programmes delivered at an alternative school/college and, where appropriate, financially compensating students where they suffer demonstrable, material financial loss because of disruption to their studies.

Communication will be maintained with students and prospective students regarding any changes to the AA School’s Designation for student support. The School website and all materials will be updated immediately to inform all concerned.

---

2.5 **Loss of accreditation**

2.5.1 **Level of Risk: Low**

The School’s five-year undergraduate programme and its Part 3 programme are validated/prescribed by ARB/RIBA for students to gain the professional awards of Part 1, Part 2 and Part 3. The ARB conducts annual monitoring in addition to the quinquennial re-preservation and the RIBA operates a quinquennial cycle inclusive of a mid-term review. The School’s ten post-graduate programmes are validated by the Open University. Each Programme undertakes quinquennial re-validation as well as an organisation-wide Administrative Audit and Institutional Review.

2.5.2 **Mitigating the Risk**

The AA School’s Academic Board and supporting academic committee structure monitors academic quality and the ability to meet validation requirements.

The AA School maintains an ongoing engagement with its validating and prescribing bodies and allocates the appropriate time and resources to ensuring that it is able to meet the requirements of annual monitoring and re-validations.

2.5.3 **Protection for students**

In the event of losing ARB/RIBA/OU accreditation, the AA School will consider measures to protect the student experience such as:

- working with ARB/RIBA/OU to resolve the reasons for the loss and meet the requirements to re-engage with these bodies at the earliest possible opportunity, and ensuring that current students can complete their course/programme of study;
- continue to deliver the affected course/programme in a non-accredited form which is clearly advertised as such;
- engage with the validating prescribing bodies to find alternative providers for students offering courses of the same level and subject. Support students in their transfer to appropriate course/programmes delivered at other schools/colleges;
- where appropriate, financially compensating students where they suffer demonstrable, material financial loss because of disruption to their studies.

Communication will be maintained with students and prospective students regarding any changes to the accreditation/validation arrangements of the AA School. The website and all materials will be updated immediately to inform all concerned.

2.6 School closure (institutional failure)

2.6.1 Level of Risk: Low

In addition to the material changes thus far identified, financial instability is a primary risk to institutional failure which could be triggered by the following:
- a significant decline in student numbers falling short of planned for target ranges;
- a lack of diversity in income streams;
- inadequate cash reserves;
- unexpected/unplanned spike in costs: rental/resources.

2.6.2 Mitigating the risk

Institutional failure is monitored through risk management and through the oversight of the AA Council. The Finance and Resources Committee, operating with the delegated authority of Council, is tasked with the responsibility for setting and ensuring the prudent management of annual budgets, monitoring revenue and voluntary income and/or benefit streams, ensuring prudent financial planning and overseeing the commitment of final resources to long-term contracts (including property leases) and the investment of monies. Financial planning; budget setting; audits; finance & resources committee scrutiny are all measures in place to mitigate the risk of institutional failure due to financial instability.

The AA submits an annual Financial, Sustainability, Management and Governance check to HEFCE/Office for Students, and has done since 2015.

2.6.3 Protecting Students

In the rare event of an extreme set of circumstances that may lead to the AA School having no option other than to close, it may consider measures such as those below to protect the student experience:
- gradual closure over a defined period that would allow current enrolled students to complete their studies at the AA School;
- where this is not possible, supporting students to transfer to appropriate courses/programmes at other providers and (where appropriate financially) by compensating students where because of disruption to their studies they suffer demonstrable, material financial loss.
3 Refund Policy

The AA School does not operate a formal Refund and Compensation Policy; however, the School Registrar supported by the appropriate appeals/complaints procedure considers requests for refunds on a case-by-case basis. Compensation in respect of a complaint being successfully upheld is considered fairly, without prejudice, and in accordance with the Office of the Independent Adjudicator’s Remedies and Redress guidance.

Whenever possible, the AA School will aim to provide broadly similar levels of refund or compensation to cohorts of students who are affected.

The AA has identified as a priority for 2018-19 the creation of a Refund and Compensation Plan conducted alongside a review of current insurance arrangements, to assure of the AA’s capabilities to compensate students fairly in the event of any breach of contract, with a targeted growth in retained earnings/cash reserves to facilitate.

4 Communicating the Student Protection Plan with students

The Student Protection Plan will be published under the STUDY section of the AA website (publicly accessible) in September 2018: https://www.aaschool.ac.uk/STUDY/

The Student Protection Plan will be provided to all successful applicants from the 2019-20 admissions cycle onwards.

The Student Protection Plan will be reviewed annually by the academic committee structure and the Academic Board in consultation with the Student Forum (the AA student body collective).

Should any element of the Student Protection Plan be triggered, the School Registrar is required to notify the affected students in writing within ten working days. This notification will also contain the specific information on the designated point/s of contact and all advice and support guidelines.