

# Student Protection Plan 2019/20



## Introduction

Under the Higher Education and Research Act (HERA) 2017, and in accordance with the Office for Students' (OfS) Regulatory framework for higher education in England, higher education providers are required to have in force and publish a student protection plan. The aim of this plan is to provide assurance to current and future students, and the OfS, that we have in place appropriate arrangements to protect the quality and continuation of study for all of our students. Leeds College of Music (LCoM) is committed to helping to ensure students achieve the best possible academic outcomes from their studies. If material changes to programmes of study occur, the conservatoire will act in accordance with this plan.

Material change may include (but is not limited to):

- A decision to close the conservatoire
- A decision to close part of the conservatoire
- A loss of or change of awarding body
- A withdrawal of designation for student support purposes
- A decision to suspend recruitment to a course for the subsequent year
- Major changes to course content that impact current students
- The removal of the Tier 4 Sponsor Licence
- The disruption of conservatoire activity (e.g. temporary disruption during term-time that is not covered by any of the above)
- The unanticipated departure of key members of conservatoire staff.

This plan will address each example of material change detailed above, assessing the level of risk each may pose to the continuation of study for LCoM students, as well as the measures the conservatoire has in place to mitigate that risk and preserve continuation of study.

In compliance with University of Hull (the awarding body) regulations, the conservatoire retains the right to make minor amendments and improvements to course, programme and module content year on year. These minor amendments and improvements do not constitute material change and do not fall under the scope of the measures detailed in this plan.

## Measures to Inform and Protect Students

Students are referred to the Leeds College of Music *Terms and Conditions for Students and Prospective Students*. Every effort will be made to communicate changes to prospective students and/or students as early as possible, with clear information, options and support tailored for each individual. The measures contained in this plan are in addition to the protections prospective students and students have under consumer protection law, and do not impinge these consumer rights.

## Risk Grading Matrix

LCoM is a subsidiary of the Leeds City College Group and risk is assessed / graded in a consistent manner, based on a simple scoring system (1 to 5) related to probability and impact. This approach to risk assessing / grading has informed the conservatoire's consideration of risk throughout this plan.

The significance of the risk is calculated by multiplying the probability score by the impact score. This gives an indication of the size of the gross risk to the conservatoire with consideration of existing controls. A similar calculation is made to determine the net risk, which is a score that reflects the probability and impact with mitigation plans in place (current and planned controls).

Probability →/ Impact ↓	1	2	3	4	5
1	1	2	3	4	5
2	2	4	6	8	10
3	3	6	9	12	15
4	4	8	12	16	20
5	5	10	15	20	25

### Scores

Low risk – 1 to 5

Moderate risk – 6 to 12

High risk – 15 to 25

## Institutional Closure (risk level – low risk)

### Risk description and controls

As a subsidiary of the Leeds City College Group, the risk of institutional failure is monitored in accordance with the Leeds City College Group Risk Management Policy and Procedure, with the board of governors ensuring that there is a risk management strategy and a common approach to the management of risk throughout the group. LCoM operates as an autonomous business unit within the Leeds City College Group which has current turnover £98 Million (including capital grant of £21 Million), EBITDA 10%, Net Assets £81 Million.

Growth in student numbers at LCoM has resulted in an increase in undergraduate numbers since 2011 of over 50%. Growth in applications for our undergraduate courses has consistently outperformed the UCAS sector year on year. The financial results, with turnover increasing by over 50% to a forecast £12.5 million as a result of this, show a return to positive generation of earnings following a significant restructuring and re-focussing of the business. The receipts of funding from HEFCE enabled the operational turnaround and support the demand for places at the LCoM once the student numbers cap was removed. The development of new courses, although initially reducing earning potential, has now delivered an increasing level of income and profitability. This has produced an underlying EBITDA of over 9% (c. £1 million), and once planned new courses are fully up and running, LCoM's EBITDA will achieve more than 11% generating over £1.5 Million EBITDA in 2020/21. After re-investing in the estate this will lead to net cash generation of £0.6 million in 2019-20. The net asset position of LCoM in 2018 is currently c. £6.3

Million (after Pension deferred liability of £4.6 million), with cash reserves of £0.7 Million. LCC in addition provide working capital support through Group Treasury facilities which assist with the management of the ebb and flow of cash caused by the increasing size of the Student Loan Company payment tranches. Close links with LCC have strengthened LCoM's position, enabled efficiencies and increased our capacity for development, placing LCoM in a confident position for future development.

A business continuity plan exists and was tested on two separate occasions during the past 12 months when we encountered i) a whole conservatoire IT network failure and ii) severe flooding of the main campus building. Although this resulted in reduced access to the main network / main campus building, the continuity plan kicked in to ensure the conservatoire was working normally within 48 hours without significant detrimental impact on the student experience. A new IT network infrastructure disaster recovery plan is currently being invested in. Due for operation in the early new year of 2019, additional Storage Area Network (SAN) will be located in a second building, the new off-site library. The plan is currently being re-drafted to meet the impact of the future increase of the current campus in 2019. Over the past 12 months we have expanded our Estate on Quarry Hill with a new library, extended teaching and learning facilities on the main campus and a large extension to the main concert hall. Future developments on Quarry Hill will provide increased scope for business continuity, the size of the LCC Group Estate providing Board assurance over our ability to continue to operate out of their offices / class rooms should a significant part of our estate not being available for any length of time. In addition informal arrangements are in place within Conservatoires UK for additional support should it be required. The LCC Group is also able to support LCoM during periods when vacancies in key staff occur to maintain continuity. Should the sustainability of the conservatoire become a significant risk, the Leeds City College Group would provide the required support to sustain the institution as much as is reasonably possible.

As a member of Conservatoire's UK (CUK), LCoM is also a participant of the CUK Disaster Recovery and Business Continuity Plan. This provides a framework for cooperation and support between CUK members in the event of a major incident which may threaten the effective working of a CUK institution and its community, or severely disrupt its programmes and operations.

#### **Contingency planning**

Should LCoM close, the closure of the conservatoire will be managed in accordance with conservatoire policies and in conjunction with the Leeds City College Group and LCoM's awarding body, the University of Hull.

In an exceptional situation, the University of Hull will be responsible for students on its validated awards completing their studies.

### **Institutional Closure of Part of the Conservatoire (risk level – low risk)**

#### **Risk description and controls**

As an institution, LCoM has a number of specialised courses and facilities. Whilst the probability of the closure of part of the conservatoire is low, the impact that this could have on students is considered significant because access to specialised facilities is an important aspect of many of our courses. The risk is

considered moderate and LCoM has a Disaster Recovery Plan to mitigate against this. The conservatoire's participation in the CUK Disaster Recovery and Business Continuity Plan also provides a framework for cooperation and support, which may include provision for teaching spaces and other teaching arrangements at other CUK institutions to support the continuation of LCoM's specialised courses.

### **Contingency planning**

In circumstances where part or all of the conservatoire facilities are considered unusable for student activities, the following remedies will typically be considered:

- Relocate provision to an alternative location. This may involve hiring spaces for course delivery (nearby where possible)
- Revise timetabling of scheduled teaching to place in facilities available elsewhere in the conservatoire. Where such a revision results in student contact sessions being held outside of normal teaching hours, appropriate consultation with stakeholders and equality impact assessments will be undertaken.

## **Loss or Change of Awarding Body (risk level – low risk)**

### **Risk description and controls**

LCoM has an established validation partnership with the University of Hull and has no immediate plans to terminate this partnership. Although LCoM aims to achieve New Degree Awarding Powers (DAPs), the conservatoire does not envisage that this will impact on students registered on LCoM courses validated by the University of Hull. Should the conservatoire achieve DAPs in the near future, students registered on University of Hull awards will be unaffected as far as possible. To achieve this, LCoM awards will be phased in for the relevant recruitment and admissions cycle to ensure that prospective students are made aware of the awarding body for their course during the research and application stage, and offer and enrolment stage. In the event that the University wishes to bring an end to the partnership – impacting current or potential students – the University is required to produce an Exit Strategy detailing how the interests of those students and prospective students will be protected. This provides mitigation in addition to LCoM's contingency planning.

### **Contingency planning**

The University of Hull validates LCoM awards. In the event that this partnership ends, the conservatoire will work with the University to:

- Ensure all reasonable steps are taken to minimise the resultant disruption to affected students
- Ensure that, as far as possible, changes are made in a transitional manner.

## **Withdrawal of Designation (risk level – low risk)**

### **Risk description and controls**

LCoM full time undergraduate and postgraduate courses are automatically designated for Student Finance, meaning that eligible students can access tuition fee and maintenance support from the Student Loans Company (SLC). The level and type of support, varies according to the domicile of the student (i.e. England, Wales, Northern Ireland, Scotland or EU) and the type of course.

The risk of LCoM courses no longer being designated for Student Finance would apply if:

- the University of Hull lost their degree awarding powers or no longer wished to validate LCoM degrees and the conservatoire was not able to find another awarding body
- the conservatoire failed an inspection by the Quality Assurance Agency (QAA)
- the conservatoire became an “Alternative Provider”, which would require an annual application for individual designation.

The risk level is considered low as LCoM and the University of Hull have an established relationship. Furthermore, it is unlikely that the conservatoire would be unable to secure an alternative validating partnership should the University of Hull lose degree awarding powers or stop validating LCoM courses. In addition, LCoM has successfully passed all recent QAA inspections and is unlikely to become an “Alternative Provider”.

#### **Contingency planning**

In the event of de-designation, resulting in the withdrawal of tuition fee and maintenance support from the Student Loans Company (SLC) for these courses, the conservatoire will take all reasonable steps to minimise its impact on students by, for example:

- Working with relevant funding bodies to allow registered students to complete their year of study/programme
- Where the above is not possible, supporting students in transferring to an appropriate programme at other institutions and, where appropriate, financially compensating students who have suffered demonstrable, material financial loss as a result of the disruption to their studies
- Merging with, or entering a validating partnership with, another institution to maintain all or part of the current provision.

### **Course Cancellation, Suspension or Closure (risk level – moderate risk)**

#### **Risk description and controls**

Course cancellations, suspensions or closures can be the result of low prospective student numbers for a specific course, delayed or rejected course validations, and other strategic decisions of the conservatoire. The risk level is considered moderate, however course cancellations, suspensions and closures are communicated to prospective students at the earliest possible stage and provision is provided for the continuation of study for existing students on these courses as far as possible.

#### **Contingency planning**

The conservatoire has procedures in place for course cancellations, suspensions and closures. These include:

- Where the delivery of a course/programme is uncertain because it is subject to final approval, this will be made clear in publicity materials. Every effort will be made to identify a suitable alternative in the event that the course/programme is subsequently not approved
- Where the delivery of a course/programme is uncertain because of low prospective student numbers, this will be communicated to prospective students at the earliest stage and every effort will be made to identify a suitable alternative in the event the course/programme is subsequently cancelled
- Where an existing course/programme is suspended or closed, its delivery for continuing students will be unaffected. Provision will be made for them to complete their course/programme, including for students who have repeat modules due to academic failure.

In an exceptional situation, the University of Hull would be responsible for students on its validated awards completing their studies.

## Major Changes to Course Content (risk level – low risk)

### Risk description and controls

Programmes of study at LCoM are validated by the University of Hull. The validation process is a rigorous process to assure the standards of courses and enhance the quality of proposals before final approval. This process helps to minimise the need for major changes to students within initial cycles of the course. In addition, courses and their associated modules are reviewed year on year to ensure validity, with minor amendments made accordingly. These amendments help to reduce the need for major amendments whilst ensuring the course's currency and relevance.

Whilst minor amendments to programmes of study are highly likely year on year, major changes are less likely to be implemented during students' studies. Where major changes are to be introduced, the existing programme will usually be taught out in its original form and the new programme phased in. Furthermore, the conservatoire cannot implement major changes to course content without the approval of a University Validation Panel at the University of Hull, consultation with affected students and the views of external examiners, in compliance with University regulations.

### Contingency planning

LCoM will not usually make major changes to a programme once it has begun. Where possible and appropriate, existing programmes are taught out in their original form and new programmes are phased in. However, in the unlikely event that there are major changes to a programme during the course of students' studies, the conservatoire will ensure that:

- Changes are restricted to the minimum necessary to achieve the required quality of experience, and affected students are notified and consulted with as appropriate
- It works with students to ensure that the revised content is acceptable

- Where necessary, students are given the opportunity to withdraw from the programme
- Where required, students will be provided with reasonable support to transfer to another programme or institution.

### Suspension of Tier 4 Sponsor Licence (risk level – moderate risk)

#### Risk description and controls

The risk of LCoM's Tier 4 Sponsor Licence being suspended is moderate. As a small institution that recruits relatively low numbers of international students, only a few rejected visa applications would take LCoM above the 10% threshold, which may trigger a UKVI investigation, especially if there are Tier 4 students who leave before the end of their course. This could involve the temporary suspension of the conservatoire's Tier 4 licence.

#### Contingency planning

In the event of suspension of Tier 4 Sponsor status, the conservatoire will take all reasonable steps to minimise the resultant disruption to students affected by, for example:

- Working with UKVI to allow registered students to complete their year of study/programme
- Offering students who have not commenced their travel to the conservatoire the opportunity to postpone their application pending the resolution of the suspension.

### Revocation of Tier 4 Sponsor Licence (risk level – moderate risk)

#### Risk description and controls

The risk of the revocation of LCoM's Tier 4 Sponsor Licence is moderate. As a small institution that recruits relatively low numbers of international students, only a few rejected visa applications would take LCoM above the 10% threshold, which may trigger a UKVI investigation, especially if there are Tier 4 students who leave before the end of their course. This could involve the temporary suspension of the conservatoire's Tier 4 licence and the subsequent revocation of LCoM's Tier 4 Sponsor Licence. We endeavor to obtain proof from students who leave before the end of their course to demonstrate that they have left the UK.

#### Contingency planning

In the event of revocation of Tier 4 Sponsor status, the conservatoire will take all reasonable steps to minimise the resultant disruption to students affected by, for example:

- Providing assistance to students to transfer to another institution.

### Disruption of Conservatoire Activity (risk level – moderate risk)

#### Risk description and controls

Disruption of conservatoire activity is considered a moderate risk as it can be the result of a variety of causes, including (but not limited to) the specific areas addressed separately throughout this plan. In this case, disruption is considered more specifically in relation to disruption impacting on course activity during term-term.

### **Contingency planning**

Where events result in disruption to course activity during term-time, the conservatoire will normally consider practicable changes to course delivery to minimise disruption to students. Actions may include:

- Changes to the staffing of a programme, for instance through a review of internal staff or, where appropriate, recruitment of area specialists
- Changes to the programme delivery method
- Relocate provision to an alternative location. This may involve hiring spaces for course delivery (nearby where possible)
- Revise timetabling of scheduled teaching to place in facilities available elsewhere in the conservatoire. Where such a revision results in student contact sessions being held outside of normal teaching hours, appropriate consultation with stakeholders and equality impact assessments will be undertaken.

## **Loss of Key Staff (risk level – low risk)**

### **Risk description and controls**

Our programmes and modules are designed to be taught by integrated teams of academic staff, which reduces the risk that the loss of staff members will have a negative impact on the continuation of study for students.

### **Contingency planning**

Where possible the conservatoire will:

- Seek to fill gaps as quickly as possible, by moving other current members of staff with appropriate skills and experience into the vacant post(s) or recruiting externally, to avoid disruption.

## **Communication with Students and Staff**

We will publicise our student protection plan to current and future students by:

- Providing access to the plan on our website
- Providing a copy of the plan with their offer letter
- Providing access to the plan on the conservatoire VLE.

We will inform students if there are to be material changes to their course via their conservatoire email and the Students' Union. We will give students 30 days' notice when we need to make material changes to



the course. In the event that the conservatoire is unable to give the appropriate notice due to circumstances outside of its control, students will be notified at the earliest opportunity with an explanation of why the 30 days' notice period has not been met.

We will ensure that staff are aware of the implications of our student protection plan when they propose changes to the course by:

- Providing access and directing staff members to the plan on the conservatoire VLE
- Addressing the student protection plan and its relationship to proposed course changes in staff training, development and meetings.

## Feedback and Review

We will review our student protection plan annually through LCoM's Academic Council. Student consultation will be sought through the Students' Union whose President is a standing member on the Academic Council. However, prospective students and students can communicate any immediate views, concerns or feedback in relation to this plan via [quality@lcm.ac.uk](mailto:quality@lcm.ac.uk).

## Refunds and Compensation

Students may be eligible for a refund or compensation in the event that the conservatoire is no longer able to preserve the continuation of study. In the event that the conservatoire is no longer able to preserve the continuation of study, decisions on refunds and compensation will be made in accordance with the conservatoire's Refunds and Compensation Policy (HE), which is available on the conservatoire's website and VLE. A copy can also be requested by email to [quality@lcm.ac.uk](mailto:quality@lcm.ac.uk).

## Complaints

If a student is dissatisfied about the way in which the conservatoire has implemented this student protection plan, they are entitled to make a complaint via the conservatoire's Complaints Policy, which is available on the conservatoire's website and VLE. A copy can also be requested by email to [complaints@lcm.ac.uk](mailto:complaints@lcm.ac.uk).