

# Student Protection Plan 2023-24



## Introduction to and structure of the Student Protection Plan

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 maintain and publish a Student Protection Plan (SPP). 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 Conservatoire has successfully delivered higher education for nearly 60 years and is committed to helping to ensure students achieve the best possible academic outcomes from their studies. This SPP builds on this experience and outlines how we will mitigate against potential risks to the quality and continuation of our programmes of study.

## Material change

If material changes to a programme of study occur, Leeds Conservatoire will act in accordance with this plan.

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

- A decision to close Leeds Conservatoire
- A decision to close part of Leeds Conservatoire
- A loss of or change of awarding body
- A withdrawal of designation for student support purposes
- A decision to suspend recruitment to a programme of study for the subsequent year
- Major changes to curriculum content that impact current students
- The removal of the international Student Sponsor Licence
- The disruption of Leeds 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 Leeds Conservatoire students, as well as the measures Leeds Conservatoire has in place to mitigate that risk and preserve continuation of study.

In compliance with University of Hull (the awarding body) regulations, Leeds Conservatoire retains the right to make minor amendments and improvements to 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

The SPP outlines the types of risks and explains the measures in place to mitigate their impact. The plan acknowledges that there is not one single measure that will be suitable for all students and will consider the individual needs of all students. Students are referred to the Leeds Conservatoire [Terms and Conditions for Students and Prospective Students](#)<sup>1</sup>. 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.

Potential risks and actions to mitigate/minimise are detailed in the sections that follow. To minimise potential risks to continuity, Leeds Conservatoire engages in a robust Business Planning and Performance Management Process. Together these ensure that appropriate resources (including staffing) are in place to deliver the programme, potential risks are identified, and actions taken to mitigate them through the risk register.

## Risk Grading Matrix

Leeds Conservatoire is a subsidiary of Luminare Education Group and risk is assessed / graded in a consistent manner, alongside University Centre Leeds, and is based on a simple scoring system (1 to 5) related to probability and impact. This approach to risk assessing / grading has informed Leeds 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 Leeds 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

### Gross Risk

Low risk – 1 to 5

Moderate risk – 6 to 12

High risk – 15 to 25

## Institutional closure (risk level = low risk)

<sup>1</sup> <https://www.leedsconservatoire.ac.uk/media/uozytlyx/terms-and-conditions-2023-24-pdf.pdf> .

### **Risk description and controls**

As a subsidiary of Luminare Education Group, the risk of institutional failure is monitored in accordance with the Luminare Education 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. Leeds Conservatoire is a subsidiary company of Luminare Education Group. For 2023/24 the group has turnover of £123.1m, EBITDA of £7.6m and net assets of £145m.

Growth in applications for our undergraduate programmes of study has consistently outperformed the UCAS sector year on year. However, financial performance reflects sector challenges including static tuition fees, flattening student number growth, and reductions to initiative funding. The development of new programmes of study, although initially reducing earning potential, has now delivered an increasing level of income and profitability. For 2023/24 Leeds Conservatoire budgeted income of £15.9m and EBITDA of £-205k, with a tax credit relief of £500k in addition to this. The net asset position of Leeds Conservatoire as at 31 July 2023 was £11.0 million (after allowing for the pension liability of £0.2 million), with cash backed reserves of £2.8 million. Luminare Education Group in addition provides working capital support through the group treasury facilities which assist with the management of the ebb and flow of cash caused by the phasing of the Student Loan Company payment tranches. Close links with Luminare Education Group have strengthened Leeds Conservatoire's position, enabled efficiencies and increased our capacity for development, placing Leeds Conservatoire in a confident position for future development.

Leeds Conservatoire has a Campus Business Continuity Planning and Recovery guide to prepare for disruptive events. This guidance covers management of an incident in the first 24 to 48 hours and forms part of wider guidance Business Continuity includes Site plans to assist conservatoire staff and emergency services in the event of any incident. There is an IT disaster recovery plan in place to minimise any impact relating to IT-related failure, and any planned disruption due to upgrades/ maintenance will be scheduled for holiday periods to minimise disruption. In addition, informal arrangements are in place within Conservatoires UK for additional support should it be required. The Luminare Education Group is also able to support Leeds Conservatoire during periods when vacancies in key staff occur to maintain continuity. Should the sustainability of Leeds Conservatoire become a significant risk, the Luminare Education Group would provide the required support to sustain the institution as much as is reasonably possible.

### **Contingency planning**

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

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 Leeds Conservatoire (risk level = low risk)**

### **Risk description and controls**

As an institution, Leeds Conservatoire have a number of specialised programmes of study and facilities. Whilst the probability of the closure of part of Leeds 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 programmes of study. The risk is considered moderate and Leeds Conservatoire has a Business Incident Plan to mitigate against this.

### **Contingency planning**

In circumstances where part or all of Leeds 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 programme delivery (nearby where possible)
- Delivering where possible online teaching and assessment.
- Revise timetabling of scheduled teaching to place in facilities available elsewhere in Leeds 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.

Exact recovery sites for each School and area of business support are outlined in the Business Continuity plan which include recovery site plans for all functions.

## **Loss or change of awarding body (risk level = low risk)**

### **Risk description and controls**

The delivery of our programmes is dependent upon the continued contractual relationships with validating partners, and we have an established validation partnership with the University of Hull. There are no immediate plans to terminate this partnership, however the contract does allow for termination, by either party of the partnership, and for the withdrawal of the approval for particular programmes. 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 includes the ability for the teach-out of all existing students. Teach Out refers to the phased closure of a programme to ensure that the impact upon students is minimal and that students are able to complete their studies. There may be certain circumstances where Teach Out is not possible but this will only be in exceptional circumstances. In the event of this, Leeds Conservatoire will support students by offering transfers to an alternative programme within the institution, or Group where possible, or to alternative programmes with other providers. However, this is the last resort and has not happened previously and will be avoided if at all possible.

This provides mitigation in addition to Leeds Conservatoire's contingency planning. The risk of any of the contact being terminated or specific approvals being withdrawn is low

### **Contingency planning**

The University of Hull validates Leeds Conservatoire awards. In the event that this partnership ends, Leeds 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.

## **Risk of failing to achieve, or maintain, authorization for Degree Awarding Powers (DAPs) (risk level = low risk)**

### **Risk description and controls**

Leeds Conservatoire aims to achieve Degree Awarding Powers (DAPs), however Leeds Conservatoire do not envisage that this will impact on students registered on Leeds Conservatoire programmes of study validated by the University of Hull.

Should Leeds Conservatoire achieve DAPs, students registered on University of Hull awards will be unaffected as far as possible and there will be a Teach Out and Exit Strategy as described in the section above. To achieve this, Leeds Conservatoire 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 programme of study during the research and application stage, and offer and enrolment stage.

Should Leeds Conservatoire fail to achieve, or maintain, authorisation for DAPs, we will look to enter a validation arrangement with the other HE provider within Luminate Education Group, University Centre Leeds. We will also maintain our validation arrangements with University of Hull, who we envisage will remain a potential validating partner of our post-graduate provision regardless of DAPs outcome, at least for a defined period of time. Leeds Conservatoire would also continue to explore other viable validating partners.

### **Contingency planning**

In the event that Leeds Conservatoire achieves DAPs, Leeds Conservatoire will:

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

In the event that Leeds Conservatoire fails to achieve, or maintain, authorisation for DAPs, Leeds Conservatoire will:

- Ensure that appropriate validation arrangements remain in place or are put in place in a timely manner
- 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

The risk of Leeds Conservatoire programmes of study 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 Leeds Conservatoire degrees and Leeds Conservatoire was not able to achieve DAPs or find another awarding body
- de-designation of Leeds Conservatoire by the Office for Students
- Leeds Conservatoire became an “Alternative Provider”, which would require an annual application for individual designation.

The risk level is considered low as Leeds Conservatoire and the University of Hull have an established relationship, and there are appropriate alternative arrangements in place such as DAPs and validating partners within the Group. It is unlikely that Leeds Conservatoire would be unable to secure an alternative validating partnership should the University of Hull lose degree awarding powers or stop validating Leeds Conservatoire programmes of study. In addition, Leeds Conservatoire has successfully passed all previous QAA inspections, awarded TEF Silver, and achieved positive outcomes of other relevant audits, demonstrating compliance of the OfS conditions of registration, 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 programmes of study, Leeds 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.

## Programme cancellation, suspension or closure (risk level = moderate risk)

### Risk description and controls

Programme cancellations, suspensions or closures can be the result of low prospective student numbers for a specific programme of study delayed or rejected programme validations, and other strategic decisions of Leeds Conservatoire. The risk level is considered moderate, however programme 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 programmes of study as far as possible.

### **Contingency planning**

Leeds Conservatoire has procedures in place for course cancellations, suspensions and closures. These include:

- Where the delivery of a 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 programme is subsequently not approved
- Where the delivery of a 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 programme is subsequently cancelled
- Where an existing programme is suspended or closed, its delivery for continuing students will be unaffected. Provision will be made for them to complete their 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 curriculum content (risk level = low risk)**

### **Risk description and controls**

Programmes of study at Leeds Conservatoire are validated by the University of Hull. The validation process is a rigorous process to assure the standards of programmes of study 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 programme. In addition, programmes of study 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 programme'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, Leeds Conservatoire cannot implement major changes to curriculum 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**

Leeds Conservatoire 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, Leeds 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 Student Sponsor Licence (risk level = moderate risk)**

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

The risk of Leeds Conservatoire's international Student 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 Leeds Conservatoire above the 10% threshold, which may trigger a UKVI investigation, especially if there are sponsored students who leave before the end of their programme of study. This could involve the temporary suspension of Leeds Conservatoire's licence.

#### **Contingency planning**

In the event of suspension of Student Sponsor status, Leeds 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 Leeds Conservatoire the opportunity to postpone their application pending the resolution of the suspension.

### **Revocation of Student Sponsor Licence (risk level = moderate risk)**

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

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

#### **Contingency planning**

In the event of revocation of Sponsor status, Leeds 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 programme activity during term-term.

### Contingency planning

Where events result in disruption to programme activity during term-time, Leeds Conservatoire will normally consider practicable changes to programme 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 programme delivery (nearby where possible)
- Revise timetabling of scheduled teaching to place in facilities available elsewhere in Leeds 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, Leeds 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 Leeds Conservatoire's VLE.

We will inform students if there are to be material changes to their programme of study via their conservatoire email and the Students' Union. We will give students 30 days' notice when we need to make material changes to the programme. In the event that Leeds 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 programme by:

- Providing access and directing staff members to the plan on Leeds Conservatoire's VLE
- Addressing the student protection plan and its relationship to proposed programme changes in staff training, development and meetings.

## Feedback and review

We will review our student protection plan annually through Leeds Conservatoire'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 Leeds Conservatoire is no longer able to preserve the continuation of study. In the event that Leeds Conservatoire is no longer able to preserve the continuation of study, decisions on refunds and compensation will be made in accordance with Leeds Conservatoire's HE Tuition Fees and Academic Related Charges Policy, which is available on Leeds 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 Leeds Conservatoire has implemented this student protection plan, they are entitled to make a complaint via Leeds Conservatoire's Complaints Policy, which is available on Leeds Conservatoire's website and VLE. A copy can also be requested by email to [complaints@lcm.ac.uk](mailto:complaints@lcm.ac.uk).