

ESCP Europe Business School

Student Protection Plan

(London Campus)

Document title: Student Protection Plan (London Campus)		
Owner: Director of Programme Administration, Quality and Standards, London Campus		
Approving body: Senior Management Team	Date of approval: August 2019	
Version: 1.0	Next review date: August 2020	
Supersedes: N/A	Previous review dates: N/A	
Public use: Yes	Staff use: Yes	Student use: Yes

1. Introduction

As a provider of higher education in the UK, ESCP Europe Business School London is required to publish a Student Protection Plan (the Plan) which sets out how continuation and quality of study will be preserved for current and potential students if a risk to their continued study crystallises. This Plan builds on our experience and is intended to assure current and future students that we have appropriate arrangements in place to protect continuation of study. It outlines the types of risks, gives examples of events that might trigger action and explains what we might do to minimise the impact of these events if they happen. As a 'one size fits all' approach might not protect each student in each instance, our Plan is also designed to take into account the differing needs, characteristics and circumstances of our student community.

2. Risk Assessment and Mitigation

The risk that ESCP Europe Business School London is unable to operate is negligible. ESCP Europe London is an autonomous subsidiary of the Paris-based ESCP Europe (EESC ESCP Europe) which itself enjoys a statutory link to the Paris Chamber of Commerce, which is its main shareholder. The London Campus is an integral part of the group and has full support and investment at this level. Numbers and revenue continue to grow and the level of financial contribution required from Paris to ensure funding for delivery and continuation of study for our students is falling. Notwithstanding this fact, letters of financial guarantee underwritten by French public authorities provide a final mechanism of support covering not only operating expenditures but also exceptional future provisions (e.g. with respect to future pension scheme liabilities). The EESC ESCP Europe owns the freehold for the School building and the Charitable status of the School in the UK is long-standing. The School has an excellent compliance record and a risk register model embedded in its strategic processes. Student growth is regulated in line with our operational capacity in London. Planning permission is being sought from Camden Council to build an extension on campus. Should these developments fail to proceed, London will constrain its growth and operate at levels without risk to its financial security. Ameliorative or contingency actions are defined for each of the major risks identified.

A comprehensive approach to risk management takes place at both Senior Management Team (SMT) and Board level. In both settings, risks are assessed, monitored and classified. The initial risk classification of SMT, which occurs on a monthly basis, is examined and evaluated by the Board of Trustees and Audit and Risk Committee on a quarterly basis.

The Risk Register is the document in which all risks are identified and contingency actions defined. It is framed by the UK Charity's Senior Management Team and presented at Board of Trustees and Audit and Risk Committee level on a quarterly basis.

a. Risk of Campus Closure

Critically, the multi-campus nature of the parent institution and the design of academic programmes as multi-campus programmes provide further insurance. If the London Campus

were, for whatever reason, no longer able to deliver material components of its courses in London, the possibility exists for those courses to be delivered at alternative ESCP Europe Business Schools (in Paris, Berlin, Madrid, Turin). It is already the case that structured parts of the same programmes are delivered in those alternative centres and in extreme circumstances, this arrangement would follow.

b. Brexit

The risk that staff recruitment and/or student enrolment are negatively impacted as a result of the current negotiations on the exit from the EU is existent as for all higher education institutions in the UK. This risk is assessed and reviewed as a part of our rolling risk management process. Any regime under which EU nationals require a Tier 4 visa for study in the UK will represent a major operational change but the School is a licensed sponsor of Tier 4 visas and, subject to that status, will be able to maintain its record of recruiting and teaching a high proportion of EU nationals.

c. Course changes and/or Closure

If we are unable to deliver specific modules in our programmes due to exceptional circumstances, we will offer students substitution modules approved by the European Teaching and Learning Committee that result in equivalent learning outcomes. However, the risk of such alteration to taught courses is extremely low. Where material changes (such as a number of changes to the structure of the programme, or the removal or addition of a number of modules) are made between the publication of the programme brochure and registration, the School will draw these changes to the attention of applicants as soon as possible and advise them of their right to withdraw their application or seek entry on to another programme. Such changes cannot apply during the cycle of a programme.

If we are unable to deliver certain programme(s) or significant parts of a programme (eg a term or a semester) at our London campus in the face of exceptional circumstances, existing students will be enabled to complete their studies. We will allow students to undertake their degree (in its remaining part) on another campus, namely Paris, Berlin, Madrid or Turin. As per our programme structure, no more than two semesters of any single Level 7 degree are delivered at the London campus, and no more than one year of any Level 6 award. Teaching Faculty are accustomed to delivering large parts of these degree programmes at one or more ESCP Europe Business School campuses. Therefore, the risk that the School would not 'teach out' a programme due to business continuity problems or unforeseen closure is non-existent. Prospective students for such cohorts will be contacted by the admissions team and will be provided with advice on suitable alternatives elsewhere.

d. Loss of validation

The London Campus works closely with City University, which validates its Master in Management. The loss of validation by City has been a considered risk within our Risk Register since first establishment. However, whilst the loss of validation constitutes a theoretical risk, we have never classified it as a significant risk due to the excellent status of our relationship and repeat renewals since 2000. The programme validation is monitored by City on a rolling basis with two Course Boards a year, plus one formal Assessment Board.

In the event that validation is withdrawn, the School would work with the University to "teach out" existing students with no impact to their experience or accreditation. This would be in accordance with City University's provisions for such an instance. Ultimately, the Master in Management is accredited by the French Ministry of Education, the Berlin Senate, the Italian

Ministry of Education. As such the loss of validation in the UK would not lead to the cessation of the programme or to any significant change in student experience. We would simply lose the ability to supplement one or more of those European qualifications with a City University degree.

e. Loss of Tier 4 license

The School takes Tier 4 sponsorship responsibilities seriously and makes every effort to ensure it is fully compliant with the UKVI requirements. Our Tier 4 sponsorship has been consistently renewed every year therefore, the risk of losing our Tier 4 Sponsorship licence is low.

Most of our students apply for a short term study visa as they only spend one semester at London Campus. In the unlikely event that the sponsorship is withdrawn the School will contact all prospective international students to support them in securing a place at another campus outside the UK.

3. Triggering the Plan and Student Support

- In any of the above mentioned risks, should a decision be made by the Senior Management which results in the need to trigger the Plan, students will be informed in writing within 10 working days of the decision being made.
- Where applicants have already accepted an offer, they shall be furnished with all necessary information, advice and guidance by the School to help them make an informed decision on their future course of action.
- Current students should be informed of their options too. The School will provide all necessary information, advice, guidance and support to facilitate students in deciding which option to follow. The standard of academic provision and the student experience must, as far as is reasonably practicable, be maintained throughout their period of registration. In particular, the conditions must be maintained to enable the stated learning outcomes in the relevant Programme Specification to be achievable by students who are being 'taught out'.

4. Refund and compensation in the event of Student Protection Plan being triggered

The annual revenue for the London campus is £10 million. This is based on direct income and operating subsidy or federal disbursement by the parent EESC ESCP Europe, which together are intended to place the UK School in fiscal balance in each year of account. Variations in annual revenue (specifically any shortfall against prediction) are addressed through running adjustment to the operating subsidy.

Ultimately, a financial guarantee arrangement is in place between the Charity and the EESC ESCP Europe. Under a Letter of Financial Guarantee signed by the EESC ESCP Europe and The Paris Chamber of Commerce (as its principal shareholder), the UK Board is given full financial guarantee for its UK operations. This Letter of Financial Guarantee is endorsed by our Auditors for its sufficiency as a part of our closing of Annual Accounts.

In final analysis, it ensures that we have recourse to any exceptional disbursement necessary to address any fiscal deficit arising from unforeseen circumstance.

The School's Refund and Compensation Policy (London Campus) sets out the provision for refund of fees and compensation in the event of the Student Protection Plan being triggered. The policy includes information on the provision to recognise and compensate students where other alternative arrangements are inappropriate or not available and/or where refund or compensation is deemed appropriate. The refund and compensation policy is applied in a fair and proportionate way ensuring students are not disadvantaged.

Please refer to the "ESCP Europe Business School Refund and Compensation Policy (London Campus)." The School Tuition Fee Refund outlined in the "Admissions Terms and Conditions" operates separately from this policy.

5. Communicating the Plan

When the School's Student Protection Plan is approved by the OFS, we will publish it on our website and also include it in the application pack of prospective students. A copy will also be made available on the School's intranet.

We aim to review our student protection plan on an annual basis, before the beginning of each academic year. Student feedback on the plan will be captured during meetings with student representatives at both federal and local (UK) levels.

An email will be sent out to staff explaining the purpose of the Plan ensuring that staff are aware of the implications of the Plan when they are engaging in relevant activities (for example proposing changes to a course) and providing signposts in relevant documentation where required. The plan will be also presented during training sessions at Faculty Meetings.