

ITALIA CONTI

Student Protection Plan

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Reviewed by:	Principal
Approved by:	Academic Quality Board Board of Directors
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The policy will be reviewed annually and updated earlier where required by legal, regulatory, funding, operational or governance changes, or by audit findings, fraud incidents, suspected fraud, material control weaknesses or lessons learned. Any material change must be approved by the Board.

Italia Conti Arts Centre Ltd
Provider UKPRN: 10038076

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1. Introduction

This Student Protection Plan explains how Italia Conti will seek to protect students if a risk arises to the continuation of their studies, including risks relating to course closure, campus closure, material course change, interruption to delivery, loss of access to specialist facilities, or changes to partnership arrangements.

The primary purpose of this Plan is to preserve students' ability to continue and complete their studies wherever reasonably possible. Where continuation cannot be preserved, or where students experience material disadvantage, the Plan explains how students will be directed to the relevant refund, compensation, complaints and support routes.

Italia Conti delivers higher education through academic partnership arrangements. For 2026/27, new higher education students are expected to be registered with the University of Chichester. A small number of continuing students may remain registered with the University of East London under teach-out arrangements. Where a student is registered with UEL, the relevant UEL academic, complaints, refund and student protection arrangements will continue to apply where applicable. Where a student is registered with UoC, the UoC student contract, academic regulations, refund and compensation policy and associated procedures will apply alongside Italia Conti's local delivery terms and policies.

2. How this Plan fits with other student-facing documents

This Plan should be read alongside:

- the University of Chichester student terms and conditions;
- Italia Conti's local delivery terms (appended to UoC terms)
- the University of Chichester Refund and Compensation Policy;
- Italia Conti's Complaints Policy and Procedures;
- relevant course information, programme specifications, handbooks and published applicant information;
- Italia Conti's Internal Curriculum Review, Course Change and Programme Development Procedure (in Quality Manual).

These documents together explain how students will be protected in relation to continuation of study, delivery, facilities, assessment, complaints, refunds, compensation and remedies.

ISSUE	MAIN ROUTE
University registration, tuition fee liability, academic regulations, assessment, progression, award and academic appeals	University of Chichester procedures
Teaching delivery, facilities, timetabling, local services, conduct, attendance, support and local operations	Italia Conti policies and procedures
HE tuition fee refunds or compensation relating to sums paid to the university	University of Chichester Refund and Compensation Policy
Refunds, credits, alternative provision or remedies relating to sums paid directly to Italia Conti, including deposits, local charges or extra-curricular activity	Italia Conti local delivery terms and applicable policies
Mixed issues involving both Italia Conti and the university	Italia Conti will help identify the correct route and will not normally require students to duplicate the same complaint unnecessarily

Italia Conti commits to:

- be open and transparent with students should any material risk to the continuity of their programme of study arise;
- inform affected students in a timely, clear and accessible manner;
- take reasonable steps to protect students' ability to continue and complete their studies;
- consult affected students, where practicable, before deciding to implement a material course change, course closure, campus change, teach-out arrangement or other significant change affecting continuation of study;
- consider the different impact of proposed changes on students with different needs, characteristics and circumstances, including disabled students, students with caring responsibilities, students with financial support needs, students who commute, students who work alongside study, and students with reasonable adjustment plans;
- use the relevant course change, quality assurance, complaints, refund and compensation routes where a student protection issue arises;
- notify the OfS where required under applicable regulatory requirements.

Italia Conti assesses student protection risks by considering both likelihood and impact.

Likelihood

- High: likely to occur during the academic year.
- Moderate: possible, but not expected to occur during the academic year.
- Low: unlikely to occur during the academic year.
- Very low: very remote likelihood.

Impact

- High: could prevent students from continuing or completing their studies as planned, or could require teach-out, transfer, refund or compensation arrangements.
- Medium: could materially affect delivery, timetable, access to facilities, support, assessment arrangements or student experience, but is likely to be capable of mitigation.
- Low: would cause limited disruption and is likely to be managed through normal operational or academic processes.

It is important to note that, whilst Italia Conti will plan for a wide range of scenarios, we consider that many of these are very unlikely to happen. We review our assessment of risk regularly to protect students' interests in the case of material change and assure financial stability and business planning.

Student Protection Plan for the period 2026-27

3. An assessment of the range of risks to the continuation of study for your students, how those risks may differ based on your students' needs, characteristics and circumstances, and the likelihood that those risks will crystallise

The risks to the continuation of study for students registered with Italia Conti arise from both internal events and/or external events which may be outside our control. When considering the impact of risks to continuation of study, or the impact of measures that we may take to ensure continuation of study in the event of a risk materialising, we consider the characteristics and circumstances of our student cohort and their diverse needs. We have this knowledge via the collection of information through the application and admissions process; including information on those who may be carers, have financial needs (including bursaries) and disability, including neuro diversity.

Risk	Likelihood	Impact if crystallised	Students most likely to be affected	Main mitigation
Institution closure	Low	High	All HE students	financial monitoring, business continuity planning, Board oversight, teach-out/transfer planning, refund/compensation route
Campus closure or loss of specialist facilities	Very low	Medium/High	practical/studio-based students, disabled students, commuting students, students with caring/work commitments	alternative facilities, timetable protection, accessibility checks, online/blended contingency, additional support
Critical systems, cyber incident, data or major IT outage affecting delivery, assessment, records, communication or student support	Low	Medium/High	all students, particularly students relying on online resources, digital submissions, student records, support systems or remote access	IT controls, cloud-based systems, backups, external provider support, cyber controls, communication contingency, assessment/records recovery planning
Course closure	Very low	High	affected course/cohort	teach-out, partner approval, student consultation, transfer support, credit/records protection
Material course variation	Low	Medium/High	affected students/applicants/offer-holders	course change procedure, consultation, approval route, published

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				information updates, refund/compensation consideration
Disproportionate impact on students with specific circumstances during a student protection event	Low	Medium/High	disabled students, neurodivergent students, students with mental health needs, students with caring responsibilities, students with financial support needs, commuting students and students who work alongside study	reasonable adjustments, ILPs, Student Services support, hardship fund, accessible communications, consultation, individual impact assessment
Partner withdrawal, validation/subcontract termination or change to award route	Low	High	UoC students and any UEL teach-out students	partner liaison, teach-out, transfer, credit certification, records protection, refund/compensation route
Loss of student finance/designation route	Low	High	SLC-funded students	OfS registration monitoring, compliance oversight, partner liaison, student communication and contingency planning
Loss of critical systems, cyber incident or major IT outage affecting delivery, assessment, records or communication	Low	Medium/High	all students, particularly students relying on online resources, digital submissions, student records, support systems or remote access	IT support, external IT provider, cloud-based systems, backups, cyber controls, communication contingency, assessment/records recovery planning

These assessments are informed by Italia Conti's Institutional Risk Register. Those registers record a number of underlying financial, regulatory, data, funding, partnership and student support risks at high or medium gross risk level. The likelihood ratings in this Plan assess the risk to continuation of study after existing controls, monitoring and governance oversight have been taken into account.

The main alignment between this Plan and the risk registers is summarised below.

Student Protection Plan risk	Relevant risk register themes
Institution closure	Financial difficulty/inflation; funding policy change; HMRC VAT liability; cost pressure; TEF-related fee risk; recruitment and retention; OfS registration; governance oversight

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Campus closure or loss of specialist facilities	Health and safety; estates/facilities resilience; business continuity; student support during disruption
Course closure or material course variation	Quality and standards; OfS Condition B; HE regulatory compliance; course approval; published information; course change governance
Partner withdrawal, validation/subcontract termination or change to award route	UEL/UoC contractual compliance; approval and external dependency risk; partnership responsibilities; data/funding responsibilities
Loss of student finance/designation route	OfS registration; government/funding policy; attendance and engagement-related funding risk; inaccurate data submission relating to public funds
Critical systems, cyber or data incident	Cybersecurity risk; data protection compliance; inaccurate data returns; records, communication and assessment continuity
Disproportionate impact on students with specific circumstances	Support for students with disabilities, neurodiversity, mental health, caring responsibilities, financial hardship or other support needs

3.1. Institution closure

The risk that Italia Conti as a whole is unable to operate, resulting in a risk to continuation of study, is assessed as low after controls. The institutional risk register records a number of underlying financial and regulatory risks, including inflationary pressure, funding policy change, tax/VAT exposure, cost pressure, recruitment and retention, TEF-related fee risk and OfS registration risk. These risks are monitored through regular management accounts, financial planning, cashflow review, external audit, risk review, senior management oversight and Board oversight. We are able to attract good quality staff, and our appeal to students, as measured by high and consistent application levels, is strong. Recruitment is strong and consistently healthy; student application data show that demand is increasing year on year. In the current admission cycle we have received over 2,500 applications for 250 places on our HE courses. Places are in demand and the average ratio of applications to places is, on average 10:1. Retention and achievement levels are monitored through Italia Conti's academic governance and quality assurance processes.

The financial viability of the Italia Conti is regularly reviewed to ensure financial stability is maintained. We manage the various risks via our planning process and contingency action planning, including strategic planning, business continuity planning and risk register. We can take action to mitigate against circumstances which might cause possible issues with our sustainability and the quality of the provision we offer. We manage our financial position through regular review and external audits.

Our business continuity planning, including a robust approach to risk management, gives us confidence that we will be able to continue operating and delivering our core purposes.

The strategic plans, risk register and business continuity plans are reviewed and updated on a regular basis, and issues which would adversely impact on student experience are considered amongst these updates. This enables us to change a course of action to provide extra mitigation against specific issues where the likelihood or impact of the risk has grown.

Italia Conti is a well-established organisation, with governance and management structures for managing our day-to-day operations, organisational resilience, and longer-term sustainability. Independent scrutiny is provided by external auditors who assess the business as a 'going concern'.

Italia Conti have recently undergone transition to new, state of the art premises in Woking. The new site provides excellent and up to date premises which are highly attractive to potential students. The new premises provides extra space, which allows us to accommodate expansion.

3.2. Campus closure

Italia Conti considers the likelihood of campus closure or significant campus unavailability to be very low. However, campus closure or loss of access to specialist facilities could occur because of events outside Italia Conti's reasonable control, including fire, flood, major building failure, public health restrictions, security incident, utility failure, landlord/building access issue or other emergency. In the event of *force majeure* or unforeseen circumstances or terrorist incident, Italia Conti's Emergency Action Plan and Business Continuity Plan, which are annually reviewed, will come into effect, and provide for the recovery and continuity of the business in the event that the institution requires relocation to alternative sites.

The risk of Italia Conti having to close part or all of any of its campus has been assessed as '**very low**' because we undertake regular internal and external safety audits, planned maintenance and regular testing of alarm systems to ensure that the fabric of buildings is fit for purpose. The new campus in Woking is a modern building recently built and specified to high standards.

3.3. Course closure

The risk that we cease to offer courses in any given area is '**very low**'.

We offer a relatively small portfolio of courses, and our courses speak to the core disciplines of Musical Theatre, Acting and Dance training in the vocational training sector. Our institutional mission requires that we offer education in these areas. Recruitment data across all courses demonstrates healthy and increasing demand and course outcomes are consistently robust.

Risks to the continuation of a specific course of study relate to force majeure events and are extremely unlikely to occur. Italia Conti has sufficient resources and access to resources to be able to mitigate such events in order to prevent disruption to students. We have designed our delivery to be taught by integrated teams of academic staff, and we are not reliant on single highly specialist members of staff to deliver any one part of our programmes.

In the unlikely event of the discontinuation of a course of study, the proposal would be considered under Italia Conti's Internal Curriculum Review, Course Change and Programme Development Procedure, partner university requirements and relevant governance approval routes. Any course closure or material change would normally be planned to allow existing

students to complete their studies through teach-out or another appropriate arrangement, unless this was not reasonably possible.

Before approval, Italia Conti would consider student consultation, published information, contractual implications, equality and reasonable adjustment implications, teach-out, transfer support, student records, academic partner approval, refund and compensation risks, and communication arrangements.

3.4. Course variation

The risk that we are no longer able to deliver material or specialised components of our courses is **'low'** because we design our delivery to be taught by integrated teams of academic staff.

We also regard as **'very low risk'** the possibility that changes to courses would impact on students. Previous experience of transitioning to new academic frameworks, including arrangements involving the University of East London and the University of Chichester, indicates that such changes can be managed in a controlled way. Where future changes are proposed, Italia Conti will assess the potential impact on student success, continuation, learning experience, published information, contractual position and student protection before approval.

As a small institution each course is discussed individually and regularly at senior management team meetings, and each student is known personally to our staff. This means that impacts on students, their progress and outcomes are in a constant state of consideration and, potentially, improvement.

3.5. Partner withdrawal, validation/subcontract termination or change to award route

The risk that a partner university withdraws approval, terminates a subcontractual arrangement, suspends recruitment, requires teach-out, or is no longer able to support an award route is assessed as **low**, but the potential impact on affected students would be **high**.

The fraud and public funding risk register also identifies approval and external dependency risk, including the risk that roles and responsibilities for admissions, attendance, engagement, student status, assessment, progression, data returns or funding eligibility are misunderstood or inconsistently applied. Italia Conti manages this through partnership oversight, quality assurance processes, regular partner meetings, student status reconciliation and escalation of material contractual or funding risks.

This risk is relevant because Italia Conti's higher education provision is delivered through academic partnership arrangements. If such a risk arose, Italia Conti would work with the relevant partner university to protect students' ability to continue and complete their studies wherever reasonably possible.

Mitigations may include:

- teach-out of existing cohorts;
- transfer to another suitable course or provider;
- certification of credit or learning already achieved;
- preservation and transfer of student records;

- advice on academic, funding and Student Loans Company implications;
- support for students with reasonable adjustments, caring responsibilities, financial support needs or other specific circumstances;
- consideration of refund, compensation or other remedies where continuation could not be preserved.

Any material change to partnership, validation or subcontractual arrangements would be escalated through senior management and Board oversight.

3.6. Course variation due to circumstances beyond our control

The risk of Italia Conti varying courses due to circumstances beyond our control has been assessed as **'low'**.

In respect of variation to course delivery, Italia Conti has had proven success in shifting effectively to online and hybrid delivery during the Covid-19 pandemic and lockdowns and retains the facility to implement such contingency arrangements should the need be required. Italia Conti has solid infrastructure for staff and students in place, including IT, equipment, up – to – date online resources etc. We use well established, mature systems and technology, including cloud-based systems such as Microsoft Office 365, across both hosted and server systems. Systems and data are automatically backed up on a regular basis. For example, our Management Information System, application systems and website are hosted by external companies, who have their own industry standard security protocols in place. There is a low risk of disruption to the connections to site internet and Wi-Fi as infrastructure and cabling is only eighteen months old. We have the added security of the oversight by the Victoria Place management at Woking, as well as from our IT and MIS Manager. Systems can be accessed remotely even if the main on-site connection is disrupted. We have security measures in place to minimise the risks of cyber or malware attacks, such as anti-virus software and Firewall.

Italia Conti also recognises that a cyber incident, data issue, systems outage or loss of access to critical digital platforms could affect teaching, assessment, student records, communication, attendance monitoring, engagement monitoring or student support. This risk is monitored through the institutional risk register and relevant IT, data and governance oversight arrangements. If such an incident affected continuation of study, assessment, progression, records, communication or student support, Italia Conti would implement IT recovery and business continuity arrangements and escalate the issue through SLT, AQB, the Board and partner university routes as appropriate.

3.7. Loss of access to student support, student finance or registration-related funding route

The risk of Italia Conti losing access to student support arrangements is assessed as low, but the potential impact on affected SLC-funded students would be high. Italia Conti manages this risk through OfS registration planning, academic partner oversight, Board and AQB monitoring, quality assurance processes, data and student number monitoring, and compliance oversight.

This risk is linked not only to OfS registration and partner arrangements, but also to accurate attendance, engagement, student status and data reporting. Italia Conti monitors attendance, engagement, withdrawals, interruptions and student status so that funding-related information

is accurate and students are not incorrectly reported as continuing, withdrawn or eligible/ineligible for support.

Because the majority of higher education provision is transitioning to UoC, and any UEL provision is expected to be teach-out only, Italia Conti will ensure that any student finance, course approval, teach-out or partnership issues are escalated promptly through academic governance, senior management and Board oversight.

4. The measures that you have put in place to mitigate those risks that you consider to be reasonably likely to crystallise

4.1. Campus Closure

Italia Conti considers the likelihood of temporary or permanent campus closure to be very low. However, the risk cannot be excluded because events outside Italia Conti's reasonable control may affect access to the campus or specialist facilities. These could include fire, flood, major building failure, public health restrictions, security incident, utility failure, landlord/building access issue or other emergency.

If a natural disaster or a major event outside of our control occurs that results in us having to temporarily close a campus, we will make sure that effective and speedy contingency arrangements are implemented to minimise any disruption to students' study.

Should part of the premises be temporarily unavailable for any reason, then Italia Conti would work in conjunction with the landlord, Woking Council, to seek out alternative accommodation and/or move course delivery online. Italia Conti has had proven success in shifting effectively to online and hybrid delivery during the Covid-19 pandemic and lockdowns and retains the facility to implement this contingency arrangement should the need be required.

If there is a strategic decision to permanently change, or substantially alter, the location of delivery for a course, we will consult with students to assess the impact on them.

If we were unable to deliver material components of the courses on campus for the remainder of an academic year, we would consider the following points:

- **Transition to online learning**

We make it clear to incoming students via the Course Specification, equipment list and induction that they will need access to a laptop or PC as part of their studies. When considering the impact of the risks of campus closure, and measures we might implement to address this, such as transition to online learning, we take into consideration the fact that a small percentage of the student cohort may not have reliable access to appropriate IT devices. Whilst a great deal of online learning can be accessed using a mobile phone or tablet, supported by communal access such as local libraries, partner university libraries and reciprocal agreements with other university libraries via our partner universities, this is most likely to impact 3rd year and postgraduate students who will require IT access to research and complete dissertations. Where possible, we will support students in accessing appropriate access to devices, e.g. access to community or university libraries. We also run a hardship fund, and students can apply for support through this.

Because Italia Conti's provision includes practical, studio-based and performance-based training, online or blended delivery will normally be treated as a temporary mitigation rather than an automatic substitute for all aspects of the student experience. Where practical classes, rehearsals, performances, assessments, specialist facilities or industry-facing activity are affected, Italia Conti will consider whether replacement sessions, amended schedules, alternative facilities, additional teaching, revised assessment arrangements, or other academic/pastoral support are required to preserve students' ability to meet the relevant learning outcomes.

If a cyber incident, systems outage or loss of access to critical digital platforms affected teaching, assessment, records, communication or student support, Italia Conti would implement IT recovery and business continuity arrangements. Where the incident affected assessment, progression, records, communication or continuation of study, the issue would be escalated through SLT, AQB and partner university routes as appropriate.

- **Sourcing alternative accommodation**

If a chosen measure were to source and transfer learning to alternative accommodation, we would take into account geographical location of our students. We recognise that many of our students live in student accommodation in Guildford, and that they benefit from a free Surrey bus pass, so we would endeavour to ensure that transport links remain manageable and do not incur extra cost, and that delivery accommodation is maintained where possible within the local Surrey area.

If alternative facilities require extended travel arrangements, we would consider alternative transport options and / or support, and also arrangements for blended learning to support access.

We would ensure that alternative facilities are suitable for the proposed activities, and accessible and ensure all relevant Risk assessments are in place for any alternative sites. We will also maintain online access to Wellbeing and additional Learning Support. Students have access to our partner universities online libraries; Italia Conti also have experience in delivering courses that are fully delivered online.

- **Changes to scheduled timetables as a result of sourcing alternative accommodation**

We also recognise that many of our learners also work outside college study in order to support themselves financially. Students are already aware that our timetables are flexible and involve high contact hours. However, where possible, we would endeavour to avoid significant changes to scheduled timetables as a result of sourcing alternative accommodation are required (such as changing scheduled days of study / non- study).

We collect information on the characteristics and circumstances of our student cohort and their diverse needs through the application and admissions process, including information on those who may be young carers, have financial needs (including bursaries) and medical needs or disability, including neuro diversity. The majority of

our full-time undergraduate population comprises young learners. We collect and review information about students' circumstances, including caring responsibilities, disability, neurodiversity, medical needs, financial need and other support needs, so that any student protection response can take account of affected students' circumstances.. In the event of campus closure and the use of alternative accommodation, we would facilitate study through the use of Individual Learning Plans (ILPs), reasonable adjustments to timetables. For all learners, we may also consider the use of blended learning to minimise disruption to continuity of study.

It should be noted that Italia Conti transitioned very successfully to a full-time online timetable, delivering both practical and theoretical subjects via synchronous delivery during the Covid pandemic, with minimal impact on learner outcomes and attainment, and the institution is confident of being able to implement relevant strategies to support students in such a situation should such an unforeseen scenario arise again.

5. Information about the policy you have in place to refund tuition fees and other relevant costs to your students and to provide compensation where necessary in the event that you are no longer able to preserve continuation of study

For students registered with the University of Chichester, HE tuition fee refunds and compensation will be considered under the University of Chichester Refund and Compensation Policy. That policy applies to students enrolled with, or holding an accepted offer from, the University for degree programmes delivered by a delivery partner. It explains the circumstances in which a student may apply for a refund or compensation, including where continuation of study cannot be preserved.

Refunds, credits, alternative provision, compensation or other remedies relating to sums paid directly to Italia Conti will be considered by Italia Conti under its local delivery terms and applicable policies. This includes, where relevant, deposits, local charges, extra-curricular activity, or other services or activities provided by Italia Conti. The UoC/IC terms distinguish tuition fee refunds handled by the University from remedies relating to sums paid directly to Italia Conti.

Refunds and compensation may include, where appropriate:

- tuition fee refunds;
- refunds for students whose fees are paid through the Student Loans Company;
- refunds for self-funding students;
- refunds where fees are paid by a sponsor or employer;
- additional travel or transfer costs;
- maintenance costs or lost time where continuation cannot be preserved;
- costs associated with transfer to another provider;
- arrangements to honour bursaries or scholarships where applicable;
- non-financial remedies, such as apology, alternative provision, additional support, or revised arrangements.

Italia Conti will work with the relevant partner university to ensure that affected students are directed to the correct refund, compensation, complaint or remedy route. Where responsibility

is shared or unclear, Italia Conti will explain the route to students and will seek to avoid unnecessary duplication of process.

Italia Conti maintains Board-reviewed financial contingency arrangements to support student protection measures where Italia Conti is responsible for delivery, local services, local charges or direct student payments. The Board will consider the financial implications of any material student protection event, including potential teach-out, transfer, refund, compensation, additional teaching, alternative facilities, travel or support costs, by reference to current cashflow, reserves, insurance and contractual responsibilities. Where a student protection event could create material refund, compensation, teach-out, transfer or additional support costs, the matter will be escalated to SLT and the Board.

6. Information about how you will communicate with students about your student protection plan

Italia Conti recognises that a key determinant of the effectiveness of its Student Protection Plan will be how its content is relayed to those whose interests it is designed to safeguard.

We publicise our Plan to current and future students via a link on the policies page of our website. We also make the Plan available in Student Handbooks and will notify current continuing students of any changes to the Plan over the summer period.

All course changes involve our Senior Leadership Team, who are aware of the Plan and its implications.

We will ensure that staff are aware of the implications of the Plan when they propose course changes by:

- addressing student protection through training and development activities;
- including the Plan as part of the Quality Assurance Manual, which is circulated to all staff.

We will engage Student Reps in the review and improvement of the Plan.

We will also review our Plan annually at the Academic Quality Board, and communicate any changes via the Course Committee meetings, which have student members from all courses.

If a situation arises which is likely to trigger this Plan, Italia Conti will:

- identify affected students, applicants or offer-holders;
- notify affected students in writing as soon as reasonably practicable once the issue has been confirmed as a material risk;
- normally provide an initial update within five working days of confirming that a material student protection risk has arisen, unless urgent circumstances require faster communication;
- explain the nature of the risk, the students or cohorts affected, the proposed mitigation, expected timescales, consultation arrangements, available support, complaint route, refund/compensation route, and named contact point;
- consult affected students and student representatives where practicable before final decisions are made;

- consider reasonable adjustments and the different impact on students with different needs, characteristics and circumstances;
- provide updates at least every 10 working days while the matter remains live, unless a different update schedule is explained to affected students;
- ensure that communications are clear, accessible and consistent across email, course meetings, student representatives, handbooks, virtual learning environments and relevant student-facing systems;
- confirm final decisions and available remedies in writing.

Should students need independent advice we will provide access to advocacy or counselling as appropriate.

7. Complaints about implementation of this Plan

Students who are dissatisfied with how this Plan is implemented may raise a complaint under Italia Conti's Complaints Policy and Procedures, unless the issue falls within the University of Chichester's procedures or, for remaining UEL teach-out students, UEL procedures. Italia Conti will explain the correct route and will not normally require students to duplicate the same complaint unnecessarily.

Where Italia Conti is the final decision-maker, Italia Conti will issue a Completion of Procedures letter where required. HE students may be eligible to refer unresolved complaints to the Office of the Independent Adjudicator for Higher Education.

8. Review and evidence

This Plan will be reviewed annually and earlier where required by material changes to legal, regulatory, funding, partnership, academic, operational, financial, estate or governance arrangements. Review will include consideration of:

- course change and programme development activity;
- student complaints and student feedback;
- student representative feedback;
- partnership or validation changes;
- business continuity information, financial information, the institutional risk register, the fraud/public funding risk register, and any relevant academic, partnership, operational, estates, cyber, data or student support risk information;
- equality, accessibility and reasonable adjustment issues;
- any event that has required, or nearly required, activation of this Plan.

Material changes to this Plan will be approved by the Board of Directors. Changes affecting academic delivery, course structure, student continuation, teach-out, published information, student protection or academic partner requirements will also be considered through the relevant academic governance route.