



Student Protection Plan for the Period 2025/26

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Introduction

This Student Protection Plan outlines the measures we have in place to protect the continuation and quality of study for all our students in the event of significant disruption. It reflects our commitment to supporting students through unforeseen changes, including course closures, institutional restructuring, or other material risks.

The plan has been developed in accordance with the requirements of the **Office for Students (OfS)** and applies to all students, including those enrolled in higher education (HE) and further education (FE) programmes. It sets out the potential risks to student progression, the likelihood and impact of those risks, and the actions we will take to mitigate them.

Our aim is to ensure that students can continue their studies with minimal disruption and, where necessary, access appropriate support, alternative arrangements, or compensation.

To assess potential risks to student continuation and quality of study, we use a **Risk Matrix Grid** that evaluates each risk based on two dimensions:

- **Likelihood:** The probability that the risk will occur, rated on a scale from 1 (Rare) to 5 (Almost Certain).
- **Impact:** The severity of the consequences if the risk occurs, rated from 1 (Insignificant) to 5 (Severe).

Likelihood ↓ / Impact →	1 (Insignificant)	2 (Minor)	3 (Moderate)	4 (Major)	5 (Severe)
1 (Rare)	Low	Low	Low	Medium	Medium
2 (Possible)	Low	Low	Medium	Medium	High
3 (Likely)	Low	Medium	Medium	High	High
4 (Very Likely)	Medium	Medium	High	High	Very High
5 (Almost Certain)	Medium	High	High	Very High	Very High

Each risk is assigned a score by combining its likelihood and impact, which determines its overall risk level:

- **Low Risk:** Minimal disruption; monitored routinely.
- **Medium Risk:** Requires mitigation strategies.
- **High Risk:** Demands active planning and contingency measures.
- **Very High Risk:** Immediate action required to protect students.

This structured approach ensures that all risks are evaluated consistently and proportionately, enabling us to implement appropriate measures to safeguard students' ability to complete their studies.

1. 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 Academy is acutely aware that prospective students require assurances that courses are effectively quality assured and accessible to them for the full duration of their chosen programme of study. The following risks to course continuity and quality have been assessed and rated:

1.1. The risk that the Academy as a whole is unable to operate is assessed as **High** (Likelihood: very likely, Impact: severe). This assessment reflects a combination of internal and external factors that could disrupt institutional continuity. Key contributing risks include:

- **Financial instability**, including the potential for serious financial difficulties.
- **Credit constraints**, such as lenders discontinuing short- or medium-term financial support.
- **Market volatility**, including adverse developments in the higher education sector.

- **Shareholder disengagement**, resulting in reduced commitment to the Academy's long-term success.
- **Strategic leadership challenges**, affecting the institution's ability to adapt and thrive.

Mitigation strategies for each of these risks are outlined in **Section 2** of this plan, ensuring that appropriate measures are in place to protect students' ability to continue their studies.

1.2. The risk that the Academy would no longer be able to deliver its courses is **High** (Likelihood: very likely, Impact: severe). This assessment is based on the following contributing factors:

- **Loss of access to specialist resources or facilities**, particularly where courses rely on specific equipment, studios, or technical environments essential to delivery.
- **Temporary disruption due to external events**, such as pandemics, fire, or civil disorder, which may affect physical access to teaching spaces or staff availability.
- **Loss of key teaching staff**, especially in niche or highly specialised subject areas where replacement may be difficult.
- **Changes in validation or partnership arrangements**, where courses are delivered in collaboration with external bodies or institutions.

Mitigation measures addressing these risks are detailed in **Section 2**, ensuring that appropriate safeguards are in place to protect students' learning continuity.

1.3. The risk that the Academy would no longer be able to deliver its provision due to building closures or unavailability of premises is **Medium** (Likelihood: rare, Impact: major). This risk reflects the potential for significant disruption to teaching, learning, and support services if access to physical facilities is compromised. Contributing factors include:

- **Lease or tenancy issues**, such as the termination or non-renewal of agreements with landlords or property owners.
- **Unexpected building damage**, including fire, flooding, or structural failure.
- **Health and safety concerns**, such as asbestos discovery or other hazards requiring immediate closure.
- **Local authority or regulatory enforcement**, leading to temporary or permanent closure of premises.
- **Loss of access to specialist facilities**, particularly where courses depend on specific equipment or environments.

Mitigation strategies are outlined in **Section 2**, including contingency arrangements for

alternative premises, remote delivery options, and communication protocols to minimise disruption.

1.4. Suspension or Loss of UKVI Sponsor Licence. The risk that the Academy will lose its UKVI Tier 4 Sponsor licence and that this will prevent students from continuing their studies is **Low** (Likelihood: rare, Impact: minor). This risk is particularly relevant to students requiring a visa to study in the UK and could result in immediate withdrawal or transfer requirements. Contributing factors include:

- **Failure to meet UKVI compliance thresholds**, including visa refusal rate, enrolment rate and course completion rate.
- **High numbers of rejected visa applications**, which may indicate poor admissions or CAS assignment practices.
- **Non-compliance with sponsorship duties**, such as inaccurate record-keeping, delayed reporting, or failure to monitor student attendance.
- **Administrative errors**, including late or incorrect submissions of the Basic Compliance Assessment.
- **Changes in UK immigration policy**, which may affect sponsor eligibility or student visa conditions.
- **Inadequate internal oversight**, leading to breaches of UKVI regulations or delayed responses to compliance issues.

Mitigation measures are detailed in **Section 2**, including robust compliance monitoring, staff training, and external audit support to ensure continued adherence to UKVI requirements.

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

The Academy will uphold its obligations to students enrolled on our provision for the duration of their registration. In the event the Academy would not be able to continue its provision, mitigating actions listed below will be taken. The Kingston University Contingency Plan would support the continuation of study for BA and BSc students and for students on the other programmes, BAJ will continue to work closely with awarding bodies to facilitate the transfer of students to another BAJ programme, or to another provider, making every effort to minimise disruption to students.

2.1 To address the risk that the Academy may be unable to operate as a whole, assessed as High, the following measures have been implemented:

- In the event that BAJ encounters serious financial difficulties, the Executive Board has mapped out a detailed range of measures which the business can take to reduce expenditure without materially affecting the student experience. As a privately-owned, non-unionised institution, BAJ benefits from agile decision-

- making, enabling rapid responses to political, financial, or operational challenges.
- BAJ maintains flexible leasing arrangements across multiple campuses, allowing for scalable operations in response to demand. BAJ is on excellent terms with its landlords and has considerable flexibility with regards to its arrangements for its multiple campus buildings; BAJ can expand or contract in size (and therefore in costs) on a flexible basis, up or downsizing as demand requires.
 - A history of successful adaptation to sector challenges, including the pandemic, is supported by formalised internal processes for scenario planning and rapid response.
 - Pre-approved credit support from lenders provides financial flexibility in the short-to-medium term.
 - Shareholder commitment ensures strategic support and willingness to explore sustainability options.
 - The appointment of a Director of Finance strengthens financial oversight and supports revenue growth.
 - The appointment of two new independent Non-Executive Directors, one of whom will chair our most senior decision-making body, the Executive Board and who bring decades of senior leadership experience in both Higher Education and in the world of industry, will strengthen BAJ's strategic leadership, bolstering its resilience and sustainability.

2.2. To mitigate the risk of disruption to course delivery, assessed as High, the Academy has implemented the following measures:

- Specialist facilities are maintained across multiple campuses, with contingency access to alternative sites if needed.
- The Academy has invested in remote delivery infrastructure (Canvas VLE), enabling continuity during external disruptions.
- A staff succession strategy ensures rapid recruitment and onboarding of replacement teaching staff, particularly in specialist areas. The recruitment strategy and procedures are annually reviewed in conjunction with the Head of Quality to ensure a consistent and effective approach to maintaining staff continuity and the quality of teaching.
- A strengthened academic leadership and quality assurance framework supports consistent delivery and compliance.
- Validation agreements with Kingston University include “teach-out” and transfer provisions under the Contingency Plan, ensuring students can complete their studies or transition to equivalent programmes.
- If “teach out” is not possible, students will be offered, where practical, opportunities that will include: (i) Transferring to other courses offered by the Academy or partner institutions. (ii) Studying a modified version of the same course. (iii) Studying via distance learning to complete their course if appropriate.
- Academic continuity planning is embedded in other partnership agreements,

ensuring students receive credit or awards even in the event of disruption.

- In the event that the Academy is unable to provide for continuation of studies internally, we will provide individualised support to assist students in identifying and transferring to alternative providers where necessary.
- In cases where no suitable continuation options are available, the Academy will consider refunding all or part of paid tuition fees, in accordance with consumer protection law.
- These obligations also extend to apprenticeship and FE students if non-continuation of study is the direct consequence of decisions or actions taken by the Academy.

2.3. To address the risk of disruption due to building closures, assessed as Medium, the Academy has implemented:

- **Long-term leases** with flexible extension clauses across six sites (London, Birmingham, Leicester, Sheffield).
- **Cross-campus flexibility**, allowing for reallocation of teaching and student services in the event of site-specific disruption.
- **Redundancy in specialist facilities**, with jewellery workshops available in both London and Birmingham.
- **Remote delivery capability** via Canvas, ensuring continuity of teaching and learning.
- **Emergency response protocols** for health and safety incidents, including rapid relocation and communication plans.

2.4. To mitigate the risk of suspension or loss of the UKVI Sponsor licence, assessed as Low, the Academy has implemented:

- **Regular internal audits** of visa compliance metrics, including refusal, enrolment, and completion rates.
- **Staff training** on UKVI regulations and sponsorship duties, including attendance monitoring and reporting.
- **Dedicated compliance oversight**, ensuring timely and accurate submissions of the Basic Compliance Assessment.
- **Admissions quality controls** to reduce visa refusals and ensure accurate CAS issuance.
- Subject to UKVI consent, **allow enrolled students to complete their year of study.**
- Offer students who have not commenced their travel to the Academy, the **opportunity to postpone their application** pending the resolution of the suspension.
- **Contingency planning** for affected students also including transfer support and academic credit documentation.

3. 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 the continuation of study.

In the event that the Academy is unable to preserve the continuation of study for one or more students, a comprehensive **Refund and Compensation Policy** is in place to ensure students are treated fairly and supported appropriately. However, students should be aware that, in the event of the Academy being wound up, they would be treated as unsecured creditors. This means that refunds or compensation may not be prioritised, and there is a degree of financial uncertainty regarding the Academy's ability to fulfil such obligations in those circumstances.

3.1. The Academy's refund policy covers circumstances including:

- **Course cancellation** within the three-week liability period.
- **Formal complaints** that result in a decision to issue a refund.
- **Disruption to study** where continuation is not possible and alternative arrangements are not viable.

This policy is embedded within the [Higher Education Tuition Policy](#) and is clearly communicated to students during induction, as well as during discussions about student finance, loan applications, and payment terms.

3.2. Compensation

Where continuation of study cannot be preserved and no suitable alternative arrangements can be made, the Academy will:

- **Offer individualised support** to assist students in identifying and transferring to an alternative provider.
- **Accurately record academic progress and credit**, enabling students to transfer their achievements to another institution.
- **Consider full or partial refunds of tuition fees and other relevant costs**, in accordance with consumer protection law, where students suffer financial loss due to disruption.

3.3. Financial Assurance

To ensure the viability of this policy, the Academy has a Credit Facility in place for the academic year 2024/25 to cover the financial implications of issuing refunds and compensation.

From October 2025, the financial policy of the Academy will include building and retaining cash reserves by allocating a percentage of annual income. This reserve is intended to support refunds and compensation for students identified as being at increased risk of non-continuation of study in the event of material change. Until this

reserve has been built, the Academy will continue to rely on the credit facility to underwrite a suitable refunds and compensation scheme.

The Academy is committed to taking all reasonable steps to minimise disruption and will communicate any changes promptly and transparently. Should the Student Protection Plan be activated, students will be provided with clear information, guidance, and support to help them make informed decisions about their next steps.

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

The Academy is committed to ensuring that its Student Protection Plan (SPP) is clearly communicated to both enrolled and prospective students, and that it is effectively implemented in the event of disruption to study.

4.1. Student Communication

- The SPP is published on the Academy's website and referenced in the student handbook, ensuring accessibility for all students.
- Students are introduced to the SPP during induction, and it is discussed alongside key policies.
- Students are also made aware of the SPP during conversations about loan applications and payment terms.
- In the event that the SPP is triggered, students will receive early and transparent communication, including:
 - Clear information about the nature of the disruption.
 - A summary of available options.
 - Contact details for support services and advisors.

4.2. Staff Awareness and Governance

- Staff proposing changes to courses must follow formal procedures, which include a review of potential implications for the SPP by the Executive Board.
- The Academy works closely with Kingston University and other awarding bodies to manage course changes. For Kingston University:
 - The Academy prepares and submits documentation to the Faculty Assistant Registrar (QAE).
 - Changes are formally approved by the Faculty Education Committee.
 - Evidence of consultation with students via Student Staff Consultative Councils (SSCCs) and Boards of Study is required before changes are considered.

4.3. Student Engagement and Feedback

- The SPP is reviewed annually, and students are invited to provide feedback through the SSCC to ensure the plan remains responsive to their needs.
- If the SPP is triggered, the Academy will actively listen to student feedback and may revise its response accordingly.

4.4. Support and Protection Measures

In the event of disruption, the Academy will take all reasonable steps to minimise impact and ensure continuity of study. These may include:

- Offering affected students, the opportunity to transfer to another course.
- Delivering a modified version of the same course.
- Supporting students to switch to a different provider.

The **Higher Education team** will be notified of any affected students and will provide tailored advice and guidance. The **Student Services team** will offer bespoke support, including:

- Helping students identify **alternative relevant provision**.
- Assisting with **contacting new providers**.
- Ensuring **timely transfer of references and academic records** to facilitate a smooth transition.

If the SPP is triggered and the change affects students, the **Accountable Officer** will notify students within **ten full working days**. Students will be informed of who to contact for personalised support, especially if they have specialist needs, and where to access further advice, ensuring tailored support for students with disabilities, sensory impairments, medical conditions, and other needs.