

Document Title: AA Student Protection Plan
Owner: School Registrar
Author: Quality Assurance Officer and Company Secretary
Date Approved: September 2025
Approved by: Academic Board
Cycle for Review: 2 years
Date for Next Review: June 2027
Location of Publication: AA Website



AA Student Protection Plan

- 1 Introduction
- 2 Risk Management
- 3 Material Changes and Measures to Minimise the Impact on Students
- 4 Refund and Compensation

1 Introduction

This Plan lays out the policy and procedures that the Architectural Association (AA) School of Architecture (the School) will follow and measures that will be taken to ensure the continuation and quality of study for all students at the School in the case of a material change. 'Material changes' are risks that the School has identified through its risk management processes, and this Plan sets out the measure that will be undertaken to minimise the impact on students should these risks arise. In addition to this Plan, the School's day to day operations overseen by the School Director, and governance oversight by the AA Council seek to ensure that such risks do not arise.

For the purposes of this Plan, material change is identified as the following (but not limited to):

- The suspension or closure of a course or programme;
- Premises closure (whole or part of the buildings/premises);
- Suspension or removal of Student Sponsor Licence;
- Removal from the Office for Students' list of Registered Providers;
- Loss of power to award own degrees (DAP) and/or accreditation (ARB/RIBA/OU);
- School closure (institutional failure);
- Major IT systems failure or ransomware attack.

This Plan applies to all students registered at the School who are completing one of the following: -

- A one-year Foundation Programme for students contemplating a career in architecture or related arts subjects, leading to The AA Foundation Award in Architecture upon successful completion of Foundation studies, and facilitating in-cycle application to the 1st Year of the Intermediate Programme for students within the Course who wish to pursue this academic pathway. Note for applicants to the 2025–26 cycle: from September 2025, the Foundation Course will be classified as a Programme, in line with all other programmes of study offered by the AA School. The Foundation Programme will lead to The AA Foundation Award in Architecture, Art and Design, following the completion of the AA's internal revalidation arrangements.
- The five-year Architect's Registration Board (ARB) prescribed and Royal Institute of British Architects (RIBA) validated full-time course in architecture delivered in the Intermediate (Years 1–3) and Diploma Programmes (Years 4–5) leading to:
 - The Bachelor of Arts (Hons) and the AA Intermediate Examination (ARB/RIBA Part 1), after three years of full-time study (the Intermediate Programme). Successful completion of the Third Year of the Intermediate Programme leads to an Unconditional Offer of Entry to the Fourth Year (Diploma Programme);
 - The Master of Architecture (MArch) and the AA Final Examination (ARB/RIBA Part 2), after two years of full-time study (the Diploma Programme). Successful completion of the Fifth Year leads to the award of the AA Diploma or the AA Diploma with Honours, this being the AA's own academic award, first awarded in 1920.

- The postgraduate provision, comprising eleven distinct Programmes of advanced full-time studies (one part-time programme is available for MA and Postgraduate Diploma awards in Conservation and Reuse):
 - Postgraduate taught Master level programmes offering MA, MSc, (PG) MArch, MFA and Taught MPhil awards;
 - Postgraduate Diploma award in Conservation and Reuse.
- The PhD degree:
 - The AA is an Affiliated Research Centre (ARC) of the Open University (OU) for the delivery and validation of the PhD degree.
- Professional Practice is a RIBA Part 3 course and examination that allows successful candidates to register as Architects with the Architects Registration Board (ARB).

The Student Protection Plan will be published under the 'Student Information' section on the AA website and provided to all successful applicants to the School within the AA's Academic Regulations.

2 Risk Management

The AA's Risk Register identifies risks faced by the institution and RAG (red-amber-green) rates them according to their likelihood of occurrence and impact. The Risk Register is reviewed by the Senior Management Team (SMT) regularly and by the Finance and Audit Committee of Council at each of their meetings (five a year). The risk appetite of the AA, and how risks are identified, scored and managed, is in accordance with the School's Risk Management Policy and Framework.

A Business Continuity Plan Framework and supporting response plans set out the practical steps that will be taken when responding to an incident that triggers the Plan. The overall aim of the Business Continuity Framework is to minimise the impact of any such incident on students and their studies. The Business Continuity Framework is reviewed every two years.

Should any element of the Student Protection Plan be triggered, the School Registrar or School Director will notify the affected students in writing within ten working days of the decision being taken, eg to close a course, or of a relevant incident arising. This notification will also contain specific information on the designated points of contact and all advice and support guidelines.

3 Material Changes and Measures to Minimise the Impact on Students

3.1 The Suspension or Closure of a Course or Programme

The School may make a strategic decision to close a course or programme for several reasons:

- Decline in student numbers over several cycles such that the viability of the course or programme is threatened;
- diminished relevance of the programme within the discipline;
- documented concerns about the quality and academic standards of the course;
- failure to meet the criteria set by periodic review of the course or reapproval process over a cycle;
- significant changes or constraints in resource allocations critical to the programme;
- sustainability concerns, including fee structures, established through evaluation and comparison of competing programmes.

The School considers the likelihood of this risk occurring to be high, given the need to keep courses and programmes regularly under review, but the level of impact on students from such a closure would be low due to the School's commitment to a 'teach-out' policy in all such circumstances.

Measures to Minimise the Impact on Students

Before deciding to suspend or close a programme, there will be an assessment to determine the rationale for

and impact of proposed programme closure.

The School's internal data collection and student feedback allows the School to monitor and manage any early indicators of a risk to the feasibility of a course or programme, including falling student numbers, falling academic standards and negative student or staff feedback.

The School's continuous annual monitoring by its prescription and validating partners allows these partners to flag any of their issues or concerns before they escalate.

Protection for current and prospective students in considering whether to close a course or programme will include but not be limited to:

- Feedback sessions with students and staff.
- Where a decision has been taken to close a course or programme, the School will commit to providing existing students with the opportunity to continue as planned and be 'taught-out' on the original course or programme, with consideration of the time required for the anticipated completion by students currently enrolled, including how reassessment, repeat modules and temporary withdrawal will be treated.
- In the unlikely event that the School is unable to provide a teach-out option for the course or programme (for example, if a member of the teaching staff leaves and the School is unable to find specialised replacement academic staff) the student will be assisted in transferring to an alternative course with another provider, and the student will be compensated for any demonstrable material financial loss because of the disruption.
- Where a decision has been taken to close a course or programme, the School will commit to relay this information to prospective students as early as possible and to offer the opportunity to transfer their application to an alternative course or programme of study at the School, subject to entry requirements. Any prospective student who has accepted an offer of a place to study at the School will be given an option to withdraw, with a deposit reimbursement, if an alternative course is unsuitable or not acceptable to the prospective student.

3.2 Premises Closure (whole or part of the buildings/premises)

The School operates on the basis that teaching must be face-to-face, and that access to physical materials, tools and workshops is a key element of the School's offer to its students. Access to the School's premises is therefore a priority for staff and students. The School owns its premises in Hooke Park, Dorset and the premises in Bedford Square, Montague Street and Morwell Street are occupied on long-lease arrangements, the majority of which terminate in different years and do not provide the landlord with the ability to break the lease during its term. All the leases are protected by security of tenure, ensuring the School as a tenant has the right to renew on similar terms. The School sees its current London location as one of its key features and has invested heavily in the development of the buildings. Regular meetings are held with the relevant landlords to support the most constructive and beneficial working relationship between parties.

It is highly unlikely that the School would ever lose access to all its premises at the same time, other than as a result of a government lockdown or similar event. The likelihood of a whole premises closure or inaccessibility is considered low, and the impact would be moderate on students, particularly if that closure or inaccessibility was short-term.

Partial closure due to a flood, fire or building safety issue in one of the School's properties is a more likely event. Such a partial closure would have minimal impact on the students' ability to study and complete their assessments, as other School property would be available. The likelihood of partial closure is considered moderate, but the impact would be low.

The School's Estates and Facilities Department ensures that all premises and facilities are fit for purpose and compliant with all regulations regarding buildings and health and safety issues. The Estates and Infrastructure Committee of Council oversees estate development and plans including health and safety, and fire risk.

Full and partial closure are key considerations in the School's Business Continuity Plan, and the response plans set out how any such incident would be immediately responded to to minimise its impact.

Measures to Minimise the Impact on Students

In all situations, the priority will be to ensure that students' assessments are able to continue and that they meet the required standards as set out in the relevant Programme Guide. Any measures taken will be communicated to students as soon as possible, either via the School's website, intranet, emails, posters on site, meetings or on social media, depending on the impact on infrastructure. A Bulk Communication response plan will be enacted if required.

Where any part of the School's premises are inaccessible or unusable, the following options will be explored. The option chosen will depend on the length and extent of the closure:

- Relocation of teaching activities to an alternative premises or location, or investigating temporary building structures with due consideration to travel and accessibility.
- Relocate teaching spaces to administrative staff spaces, and administrative staff affected can work at home.
- Review and revision of the timetable to enable scheduled teaching or assessments to take place in alternative premises or outside the published teaching hours.
- Delivering teaching online and prioritising the available space for assessments.
- Extension of deadlines (if short-term).
- If Hooke Park were closed but London premises were still available, students may be relocated to London and compensated for the additional costs for accommodation or travel. It is also feasible that alternative workshop space could be temporarily found near to Hooke Park.

If all the School's London properties were closed or inaccessible, the School will explore the following options depending on the length and extent of the closure, eg in the case of a national lockdown or short-term central London infrastructure issue.

- Relocating to alternative premises, location or investigating temporary building structures with due consideration to travel and accessibility.
- Review and revision of the timetable to enable scheduled teaching or assessments to take place in alternative premises and outside the published teaching hours.
- Extension of deadlines (if short-term).
- Delivering teaching and undertaking assessments online whilst always ensuring the required standards for the assessments are maintained.
- Online teaching and assessments can be enabled through amendments to the unit or programme briefs, whilst ensuring the required outcomes are met.
- Supporting student's online learning and assessments by making additional software available.

Prospective students will be informed of any changes to the location of the course or programme as soon as possible, and all information on the website will be updated to reflect any change in location.

3.3 Suspension or Removal of Student Sponsor Licence

The School's Student Sponsor licence could be revoked if the School fails to comply with UKVI requirements, or those of the Office for Students (OfS) (see 3.4 below). The maximum period a sponsor can continue to teach students after their licence is revoked is six months or the end of the student's current academic year, whichever is the longest.

The School has maintained its UKVI Student Sponsor licence since 2010 and has continuously positive rates as demonstrated by the annual Basic Compliance Assessment (BCA) results. All core requirements have been met and passed. The School's Compliance team regularly review UKVI regulations and inform the necessary departments of changes as and when required.

As well as complying with all conditions of the UKVI, the Student Sponsor licence is reliant on the School maintaining its Office for Students registration. The condition of registration is overseen by an academic governance structure which includes the Academic Board that reports to the Council. The School is committed to regular audits, completed by external professionals, to ensure compliance with UKVI regulatory requirements. The risks to the School's Student Sponsor licence and conditions of registration are a key risk within the School's Risk Register and therefore managed and mitigated accordingly. Given the above, the risk of loss of the Sponsor licence is low, but the School acknowledges that if it did occur, the impact on students would be high.

Measures to Minimise the Impact on Students

Any concerns about compliance with UKVI requirements, and any UKVI audit or investigation, will be prioritised in terms of the School's resources. Even if a serious breach were alleged to have occurred, there would be an investigation and the School would have the chance to respond and rectify concerns. While UKVI may suspend the ability to assign new CAS during an investigation, a suspension would not affect current students.

If, following an investigation, the UKVI concluded that the School's Student Sponsor licence was to be revoked, the UKVI will consider whether to allow some or all the sponsor's students to continue to be taught by the sponsor for a limited period. The maximum period a sponsor can continue to teach students after their licence is revoked is six months or the end of the student's current academic year, whichever is the longest.

If a revocation were to occur, the School would do the following to protect students:

- Work closely with UKVI as far as possible to support individual student visa positions. Should this not be possible, support students in their transfer to an appropriate course/programme delivered at an alternative school/college.
- Consider refunds and compensation to affected students on a case-by-case basis as detailed in the Refund and Compensation Policy.
- Regular communication will be maintained with students throughout the transition period and face-to-face meetings will be held with students.
- Increased wellbeing support will be made available to students.

Prospective students will be immediately informed of the loss of the student sponsor licence through direct emails and updates to the School website. New applications will be suspended or closed.

3.4 Removal from the Office for Students' (OfS) List of Registered Providers

To register and remain registered with the OfS, providers must show that they offer a high standard and quality higher education. The conditions of OfS registration are designed to make sure that providers maintain these high standards. The School became registered with the OfS, in the Approved Category, in April 2019 having satisfied the initial conditions of registration. The School must continue to comply with ongoing and new conditions of Registration, which includes submitting a number of annual returns each year to satisfy conditions. Whilst the OfS may impose specific conditions on individual providers based on a risk assessment, the School has no specific risk-based conditions imposed upon it.

Registration with the OfS enables the School to maintain its UKVI Student Sponsor Licence; to continue awarding its own degrees; and allows students to avail themselves of student support from Student Loans Company. If the School failed to comply with a condition, the OfS would not immediately revoke the School's registration. The OfS would investigate its concerns and could, either during the investigation or at its conclusion, impose specific conditions. It is likely that the OfS would keep compliance with the specific conditions under review, and only if they concluded there were still failings would the OfS revoke the registration.

The School's Academic Board and supporting academic governance structure monitors academic quality and standards, and the School's ability to meet regulatory requirements. This is supported through regular

monitoring of all programmes, with external examiners' feedback received annually, and at least annual student feedback sessions are held unit by unit with the School Director and Registrar.

The School's five-year undergraduate programme and its Part 3 programme are validated/prescribed by ARB/RIBA for students to gain the professional awards of Part 1, Part 2 and Part 3. The ARB conducts annual monitoring in addition to the quinquennial re-prescription, and the RIBA operates a quinquennial cycle inclusive of a mid-term review. This supports the School's maintenance of high quality and standards.

The School has a Student Information System that ensures the required data provided in statutory data returns is reliable and accurate.

Given all of the above detail, the likelihood of the School being removed from the list of providers is very low, but it is recognised that the impact of removal would be significant for students.

Measures to minimise the impact

If concerns about the School's compliance with registration conditions were to arise, the School would work closely with the OfS to respond to their concerns and act upon any specific conditions imposed as a priority.

In the unlikely event that registration was removed, the School would:

- Work with relevant regulatory bodies to allow registered students to complete their course or programme, or at the very least allow students to complete their assessments for the relevant year;
- Should it not be possible to allow registered students to complete, the School would liaise with alternative providers and support students in their transfer to a suitable alternative provider;
- Consider refunds and compensation to affected students on a case-by-case basis as provided for within the Student Refund and Compensation Policy;
- Maintain regular communication with existing students on developments and the impact on them, and hold face-to-face meetings as required, and;
- Make increased wellbeing support available to students.

Prospective students would be immediately informed of the loss of registration through direct emails and updates to the School website. New applications would be suspended or closed.

3.5 Loss of power to award own degrees (DAP) and/or accreditation (ARB/RIBA/OU)

The School was awarded temporary degree awarding powers in April 2019 which is in place until September 2028, prior to which an application will be made to make the degree awarding powers permanent. These powers enable the School to award its own degrees rather than needing to utilise another provider.

The School's five-year undergraduate programme and its Part 3 programme are validated/prescribed by ARB/RIBA for students to gain the professional awards of Part 1, Part 2 and Part 3. The ARB conducts annual monitoring in addition to the quinquennial re-prescription, and the RIBA operates a quinquennial cycle inclusive of a mid-term review.

The School is an Affiliated Research Centre with the Open University and all students studying for a research degree at the AA are awarded by the Open University.

The School's Academic Board and supporting academic committee structure monitors academic quality and the ability to meet validation requirements. Section 3.4 provides additional detail on these processes.

The School maintains an ongoing engagement with its validating and prescribing bodies and allocates the appropriate time and resources to ensure that it can meet the requirements of annual monitoring and revalidations.

The loss of degree awarding power or ARB/RIBA accreditation would have a significant impact on the value of a course/programme for students, particularly in terms of their graduate outcomes. Given all the above, the likelihood of this risk occurring is very low, but it is recognised that its impact on students would be significant.

Measures to Minimise the Impact

In the unlikely event that the School did lose either its ARB/RIBA/OU accreditation/validation, or lose the power to award its own degrees, the School will consider the below measures to minimise the impact on students (noting that the measures required would depend on which accreditation, accreditation or power was lost):

- Work with the relevant body/s to resolve the reasons for the loss and meet the requirements to re-engage with the same at the earliest possible opportunity, and ensure that current students can complete their course/programme of study;
- Work with external providers to provide an alternative means for degrees to be awarded;
- continue to deliver the affected course/programme in a non-accredited form and ensure they are advertised as non-accredited;
- Engage with the validating prescribing bodies to find alternative providers for students offering courses of the same level and subject. Support students in their transfer to appropriate course/programmes delivered at other schools/colleges;
- Consider refunds and compensation to affected students on a case-by-case basis as detailed in the Student Refund and Compensation Policy;
- Maintain regular communication with existing students on developments and their impact on them, and hold face-to-face meetings as required;
- Make increased wellbeing support available to students.

Prospective students will be immediately informed of the loss of any degree awarding powers or accreditation through direct emails and updates to the School website and relevant materials.

Prospective students will be provided with information on the potential impact on their graduate outcomes to enable an informed decision to be made.

3.6 School Closure (Institutional Failure)

In addition to the material changes thus far identified, financial instability is a primary risk to institutional failure which could be triggered by the following:

- A significant decline in student numbers falling short of planned for target ranges;
- A lack of diversity in income streams;
- Inadequate cash reserves;
- An unexpected/unplanned spike in costs: rental/resources;
- A government policy change that severely impacts the number of overseas students able to attend the School.

The financial stability of the School is carefully overseen by the Finance and Audit Committee of the AA Council. The Committee is responsible for ensuring a prudent annual budget is proposed to Council, that internal controls exist to monitor income and expenditure, and that the School maintains an appropriate level of reserves. The School has a Reserves Policy which sets out the minimum level of reserves held at any time, and this seeks to ensure short-term financial losses do not result in institutional failure.

The School submits an annual Financial Return to the OfS, including audited financial statements and a five-year budget projection. The AA's annual report and financial statement are all publicly available on the School's website, the Charity Commission and Companies House.

Measures to minimise the impact

In the highly unlikely event of institutional failure occurring, and where there is no other option other than to close, the following measures would be taken to protect students:

- Gradual closure over a defined period that would allow current enrolled students to complete their studies at the School utilising the reserves;
- Supporting students to transfer to appropriate courses/programmes at other providers;
- Consider refunds and compensation to affected students on a case-by-case basis as detailed in the Student Refund and Compensation Policy.

3.7 Major IT Systems Failure or Ransomware Attack

Students and staff at the School rely heavily on IT for accessing resources, facilities, submitting assessments and capturing data. Whilst a short-term or partial IT failure would not impact students, a major failure, national infrastructure impact or a successful ransomware attack could cause significant disruption for students. The impact could be that course materials, software, communications, data and students' work and assessments become inaccessible.

The School's risk register has identified that a cybersecurity attack is a significant risk to the School, and appropriate resources have been allocated to minimise this risk as far as possible. The School's Information Security Policy seeks to ensure the necessary safeguards are in place to prevent failure or an attack, and should an incident occur the Cybersecurity Attack Response Plan and IT Recovery Plan set out the steps that will be taken to minimise its impact and ensure a recovery is completed as soon as possible.

Where such an incident did occur, the impact on students would very much depend on the length of time or extent of the impact. The prioritisation would always be the students access to the systems where a failure did occur.

At the School, teaching takes place face-to-face and while assessments are submitted online; this could move to physical submissions. An IT failure or ransomware attack would not halt teaching or prevent the submission of assessments. At all times, the standards for assessment would be maintained with no actions taken that would dilute those.

Measures to Minimise the Impact

Where a major failure occurs and/or there is a loss of student work and records, the following measures would be considered to protect students, in addition to all the actions that would be taken to recover the systems and records:

- Methods for submission of coursework and assessments could be adapted to move from online to physical;
- Deadlines for submissions could be extended as appropriate;
- Unit briefs could be adapted to utilise more physical materials, or shift to alternative software;
- Additional support would be provided by tutors and programme heads to students to assist them with any loss they have suffered;
- Mitigating circumstances for students affected by the failure or attack would be considered as appropriate whilst ensuring the standards of assessment are maintained;
- Communication with students could be provided through face-to-face meetings given the small size of the School.

Prospective students will be informed via the website or social media, wherever this is feasible, of the impact of the failure and where necessary deadlines for applications, visa information and payments will be extended. If there is a longer-term incident, the School could undertake physical sharing of documentation by post or in person.

4 Refund and Compensation

AA Student Protection Plan

The AA School Refund and Compensation Plan supplements the Student Protection Plan and provides more detail on the commitment to compensating students that are disadvantaged as a result of a material change in their programme of study. The Refund and Compensation Plan was updated in June 2025 with the Student Protection Plan.

Refund and Compensation Policy

1. Purpose

This policy outlines the School's approach to refunds and compensation in the event of disruption to students' studies due to material changes, as defined in the Student Protection Plan.

2. Principles

Where a material change has occurred, all relevant mitigation measures outlined in the Student Protection Plan will be taken to remove or minimize the impact on students. The priority of the School is to ensure student study and their assessments are not impacted by a material change.

Where students are negatively impacted by a material change and the mitigation measures have not been effective in removing or sufficiently mitigating the impact, the School will consider whether a refund, in full or partial, and/or compensation is appropriate. In considering the level of refund or compensation the School will consider its role or that of its staff in causing the material change including any omissions, and will consider financial loss to the student, any non-financial harm caused to the student and steps taken by the student to mitigate their loss or the impact. The School will seek to be fair, reasonable and proportionate in providing refunds or compensation to students.

Students will only be entitled to a refund or compensation where the outcome or conclusion, and therefore the impact of the material change is known e.g. upon withdraw of student sponsor licence, not during the investigation period.

3. Scope

This policy applies to students who have been directly impacted by the material change and are either at the time of the material change :-

- A registered student on a programme at the AA;
- A prospective student who has accepted an unconditional offer; or
- A prospective student who has accepted and fulfilled the conditions of a conditional offer.

This does not apply to Visiting School students.

4. Refunds and compensation for impact of material change

Refunds and/or compensation may be considered in respect of the following financial losses:-

- Tuition fee refund in full or partial where the School closes a programme or course with no teaching-out options, or institutional failure;
- Loss of student visa status due to the School's loss of visa sponsorship license;
- Reasonable cost of relocation due to premises closure;
- Reasonable cost of additional travel or accommodation;
- Loss of rental deposit due to short notice of material change impacting ability to study at the AA;
- Any other financial loss to a student directly due to the School's material change.

The School may consider requests for compensation for non-financial loss where significant harm and damage has been caused to the student as a direct result of the material change. Any such compensation will need to take into account the efforts of the School to mitigate the impact, the reasonable expectations of the student in the circumstances, whether an objective person knowing the relevant facts would consider compensation reasonable and the efforts of the student to mitigate the impact of the material change.

5. Refund Process

- The School will notify students of their right to request a refund or compensation as soon as reasonably possible in the particular circumstances of a material change occurring and the impact being known;
- Students or prospective students should make their request, setting out what they are seeking a refund and compensation for to secretary@aschool.ac.uk within 30 days of being notified of a material change impact them;
- Refunds will be made only to the original payer only (e.g. Student Loans Company, sponsor, or individual).
- Refunds will not be issued in cash.

6. Complaints and Appeal

Any student or prospective student who is dissatisfied with the outcome of their refund or compensation request should raise the matter as a formal complaint under the AA Complaints Procedure. If upon the conclusion of the complaints procedure a student or prospective student is still dissatisfied they may raise the matter with the Office of the Independent Adjudicator for Higher Education (OIA).