



The Inns of  
Court College  
of Advocacy

# Student Protection Plan 2020–21

**Provider's Name:** Inns of Court College of Advocacy (ICCA) via a scheme of delegation from the Council of the Inns of Court (COIC).

**Provider's UKPRN:** 10081618

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**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 Inns of Court College of Advocacy will commence the delivery of the BPTC in the Academic Year 2020/21. The ICCA only deliver one academic programme (The Bar Professional Training Course (BPTC)), which is split in to two parts, an online phase of 12 -16 weeks followed by a campus-based phase of 20 weeks. The LSB has approved new rules from the regulator, the BSB to enable this model as a permitted pathway – <https://www.legalfutures.co.uk/latest-news/barrister-apprentices-on-way-as-training-reforms-are-approved>

Operationally this means the following:

- Marketing launch – September 2019
- Admissions open – December 2019
- Selection/enrolment – February – June 2020
- Online Phase – August 2020
- Examinations – December 2020
- Campus-based phase – March 2021

After the launch of the course there will be two courses per year as follows:

- Cohort 1 – Online Phase (August); Examinations (December); Campus Phase (March)
- Cohort 2 – Online Phase (January); Examinations (May); Campus Phase (September)

The campus-based phase is taught by the ICCA staff across the campus of the four Inns of Court at:

- The Honourable Society of Gray's Inn
- The Honourable Society of Lincoln's Inn
- The Honourable Society of the Inner Temple
- The Honourable Society of the Middle Temple

The ICCA operates as a subsidiary of a charity on a not-for-profit basis. The ICCA has the following objectives in the delivery of the BPTC:

**Flexibility** – A flexible qualification route that has appeal to suitably qualified students and reduces the financial risk to students;

**Accessibility** – Admission to the course that is based on merit and is open to all suitably qualified students regardless of background;

**Affordability** – To provide real value to students by delivering a not for profit course, which is competitive and represents a substantial saving as compared to current London course fees; and

**High Standards** – Provide the best possible educational experience and vocational training to students through strong links with the practising Bar and by harnessing the advocacy training expertise within the Inns of Court.

The course is delivered by the ICCA on behalf of the four Inns of Court, who are all represented on the ICCA's Board of Governors. The ICCA's Trustees have agreed the following vision statement for the Course:

"To reinforce the Inns' **educational objectives** and act as a **catalyst for change** in the BPTC market by providing the **highest quality** course at a **fair price** to those with a **reasonable prospect of success**, and in so doing improve **accessibility** and promote **diversity** at the Bar".

## Risk Analysis

**Risk that the Institution will cease to operate:** Likelihood *low* (impact on student *high*)

The ICCA operate under a grant from the four Inns of Court and the BPTC course is run on a modelled five-year budget with all reasonable risks accounted for. At full recruitment the course comfortably covers all costs incurred by the ICCA in its delivery. There are two unlikely scenarios where the operation of the course ceases to become viable for the ICCA:

- A dramatic and unsustainable rise in costs
- Significant under-recruitment of students

At full recruitment each year, the ICCA achieves an operating surplus, which mitigates student under-recruitment by approximately 10%. Based on the market research conducted with potential students, such a shortfall is assessed unlikely based on the current BPTC market and our competitor analysis.

The ICCA uses the facilities of the Inns of Court to deliver the BPTC and the ICCA has a cost base (excluding salaries of <£200K per year). This means that all reasonable costs can be easily controlled and significant increases in cost which could make the course unviable are extremely unlikely. Academic staff costs are linked to student recruitment (1 academic for every 12 students) and suitable action would be taken in the event of persistent under-recruitment to reduce staff overheads.

The Council of the Inns of Court has a risk management methodology which monitors and reports on risk and allows for early mitigating measures to be implemented. All risks and the ICCA responses are overseen by the Audit and Risk Committee and the Board of Governors.

In the highly unlikely event of course closure, the ICCA closure policy would be implemented, which is also overseen by the professions Professional, Statutory and Regulatory Body (PSRB), the Bar Standards Board (BSB). The closure policy ensures that all students are protected and there is a commitment that all students enrolled on the course, including those with deferred places, have the opportunity to complete the course. Trading will only cease when all students have graduated.

**Risk that the institution will close a location building or campus and cannot find a suitable location:** Likelihood is *low* (impact on student *low*)

The ICCA teaches across the four Inns of Court and have approximately twice the teaching room capacity required to teach the BPTC, as such the ICCA's business continuity plan will always re-book suitable accommodation on-campus in the first instance. The ICCA books all teaching

accommodation 12 months ahead and the providers of teaching accommodation (the four Inns of Court) will operate to a service level agreed with the ICCA and ensure that the ICCA has primacy for facilities during the term-time working day.

In the event that a building or zone becomes unavailable, the ICCA's Registry Services team will re-book accommodation and inform students. Additional teaching space within the Inns and other local facilities can be quickly customised to meet the needs of the BPTC, with minimal impact on the learning of students.

**Risk of discontinuing a specific subject or programme:** Likelihood *low* (impact on student *high*)

The ICCA only offers one programme. Therefore, the risk management approach is the same as the response to Risk that the Institution will cease to operate.

**Risk for Higher and Degree Apprenticeship Provision**

n/a

**Risk we cannot provide the programme through no choice of our own:** Likelihood *low* (impact on student *high*)

To deliver the BPTC, the ICCA must be:

- Authorised to deliver the course by the PSRB (The BSB); and
- Validated by an Academic Partner (King's College London) as the Degree Awarding Power for the provision of the PG Dip award.

The loss of either of these accreditations (accreditation from both bodies lasts for five years) would result in the ICCA not being able to deliver the course. Although this would have a significant impact on students, the likelihood is assessed as low for the following reasons:

- All ICCA processes and policies are linked to the UK Quality Code.
- All relevant processes, including quality assurance and academic regulations have been incorporated from the Academic Partner.
- External examiners from the PSRB and the Academic Partner will be appointed and will sit on all relevant committees.
- All mandatory reporting requirements are adhered to.
- All processes relating to marketing and student services are fully CMA compliant; and
- The ICCA has implemented the necessary governance committees to ensure appropriate academic and operational oversight.

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

The Student Protection Plan will apply if the ICCA:

- Discontinue the BPTC
- Close a location (building or campus) in which the course is taught and cannot find suitable premises at a nearby location.

or

- The ICCA can no longer provide the BPTC because
  - ◆ we cease operating through no choice of our own
  - ◆ we lose authorisation from the PSRB
  - ◆ we lose academic validation

The management of these risks will be in accordance with the following ICCA policies, available on request:

Policy	Staff Member responsible	ICCA Governance Committee responsible
Fair admission policy	Operations Director	Board of Governors
Closure policy	Dean	Finance and Operations Committee
Awards policies (various)	King's College London	BPTC Education Committee
Policies relating to collaborative (validated) provision	King's College London	BPTC Education Committee
Fee, refund and compensation policy	Operations Director	Finance and Operations Committee

These policies are in place to protect students, maintain the academic and operational aspects of the ICCA and allow it to mitigate risks. All policies have been developed in line with the Quality Code for Higher Education and CMA guidance.

## 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

Our Fee, refund and compensation policy will provide the necessary re-assurance to students and validators/authorisers of our course that students have the necessary protections and that the ICCA is compliant with all necessary legislation, including CMA policy and guidance.

The policy is written by the ICCA's Operations Director and overseen by the ICCA's Finance and Operations Committee. In the unlikely event of closure or the ICCA's BPTC cannot be run for operational or academic reasons, students will receive full refund or alternative arrangements will be sought for the delivery of the course. There will be no enrolled student on the ICCA's BPTC who

will not have the opportunity to attend a BPTC course at the price advertised and within the Academic Year in which he/she is enrolled.

A student who withdraws, for example in the event of long-term illness or disability or is required to withdraw from the course may incur financial loss for a portion of the fees, however the student will have the opportunity to be re-admitted to the course in a subsequent year as long as the student remains academically qualified to attend (currency of pre-requisite qualifications).

## **Information about how you will communicate with students about your student protection plan**

This Student Protection Plan will be communicated in the following ways:

- On the ICCA website at [www.icca.ac.uk](http://www.icca.ac.uk)
- Within terms and conditions, shared with applicants prior to accepting an offer with the ICCA.
- As part of the enrolment process.
- Linked from the ICCA's Academic Regulations and Student Handbook.

The plan will form part of our external quality assurance 'pack' and will be subject to regular review by the Director of Operations and Dean of the ICCA. It will be aligned to other relevant policies and will be monitored by the Finance and Operations Committee, which report to the Board of Governors.

Should any element of the plan be activated students will be notified within one week of the decision being formally approved and made aware of their rights as stipulated in the plan and CMA guidance.

*We have been asked to provide further information by 2nd April 2019, in respect of C3, the Student Protection Plan, regarding information about student engagement. Please find below the requested information:*

The ICCA recognises that involving students in the review and development of future plans is key both to ensuring we enshrine the highest educational standards of vocational training into our BPTC to prepare students for their pupillage or work-based learning and to ensure the optimum experience at the ICCA for all students. Indeed, it is a condition of our Academic Partner, King's College London, as contained in the Quality Assurance Handbook (Paragraph 8.1, Page 80) that "*all Programmes are expected to have procedures in place to collect feedback from students*".

The ICCA undertakes to students (see the ICCA BPTC Student Handbook 'Student Voice' section, p.49) that their views will be properly considered in accordance with the following principles:

- Every student at the ICCA deserves the right to raise any issues they are facing with the quality of their education or student experience directly with the ICCA.
- Every student on BPTC Part Two at the ICCA deserves access to a representative at study level.
- The ICCA will engage with all the student representatives to ensure that all concerns are heard and responded to in a timely and relevant manner.

As such, the ICCA will gather feedback through Student Representatives, through Student Staff Liaison Committees, through Student Feedback Surveys and through student representation on the ICCA BPTC Education Committee, all of which are clearly referenced in the Student Voice section of the ICCA BPTC Student Handbook (page 49). There is also a comprehensive student complaints procedure within the Academic Regulations (page 43) which is referenced for students at page 50 of the Student Handbook.

Although the course is delivered in an academic environment, the ICCA will implement processes and evaluation techniques which also draw on best practice in vocational training, namely the four levels of training evaluation (Kirkpatrick, D.L. (1994)). These four levels are:

- Level 1 Reaction measures how students react to education and training
- Level 2 Learning analyses if the understands the training and education (e.g. is there and increase in knowledge, skills or experience)
- Level 3 Behaviour - whether students are utilising what they learned at work
- Level 4 Results determines if the training and education had a positive impact on the profession

When adhering to this model it is only Level 1 and 2 that apply to educational institutions when eliciting student feedback. However, to ensure a best practice approach is taken, all student feedback mechanisms should meet the criteria of Level 2, i.e. do not focus purely on immediate reactions, but to promote reflection on the acquisition of knowledge and skills.

Level 3 evaluation remains important for institutions to conduct, and therefore maintaining contact with alumni is important to measure the level to which training and education transferred to the demands of the work-based component.

Students will be invited to submit a questionnaire at the end of each module to provide detailed feedback on all aspects of the teaching, assessment, learning environment, administration and resources. This will be part of a planned modular review which will utilise the Student Record System and Moodle VLE data to provide a holistic overview for the ICCA's course and college level leadership.

Questionnaire design is key to elicit Level 2 feedback and questionnaires will go beyond the traditional 'happy sheet' format. Questionnaires will reference learning outcomes and the Bar Standards Board Professional Statement and will ask students to reflect on their own level of competence at the end of a module.

Students will also have the opportunity to raise a question through the ICCA VLE at any point during the course to provide feedback relating to any issue relating to teaching, assessment, learning environment, administration and resources. This will be treated as a feedback mechanism and is separate from the College Complaints Procedures. Students will have the option to remain anonymous or provide their details to facilitate a follow-up discussion.

The ICCA has developed all the necessary registry functions to administer student feedback and have recruited a Management Information and Planning Manager (MIPM) to make this process effective. Course questionnaires will include questions on reaction to teaching but also student confidence in their ability to meet the requirements of the Professional Statement. These

questionnaires will be implemented after each module and tutors will be responsible for ensuring all students participate. The MIPM will present this information to the academic staff in the form of dashboards which also include analysis of module results to measure student reactions and confidence against overall performance.

Staff Student Liaison Committee (SSLC) meetings (see Student Voice section of the Student Handbook, page 49) are designed to provide student representatives with a forum to raise feedback on behalf of the students they represent to staff on the BPTC. SSLCs will be chaired by the Course Leader and attended by tutors with responsibility for individual BPTC modules.

The volunteer Student Representative will have access to anonymised questionnaire summaries and dashboards produced by the MIPM. Additionally, any student with feedback for the academic or support staff will be invited to make contact with the Student Representative at any point. Student representatives sitting on SSLCs will be encouraged (as referred to in the Student Handbook SSLC section, page 50) to proactively gather feedback from their fellow students.

There will be regular opportunities for the Student Representative to engage with the ICCA's leadership, specifically the BPTC Course Leader and Operations Manager. Certain issues may then be raised to Director level for resolution. The Student Representative will also have the opportunity to provide feedback to the ICCA Governors via the BPTC Education Committee.

The ICCA may request students to attend focus groups where course review is planned to discuss new ideas and gain feedback on planned changes and enhancements. This must be balanced against the academic demands of a 20-week course and may be addressed with volunteer alumni where necessary.

All feedback results will be available to the BPTC Education Committee, the Terms of Reference of which are contained in the Academic Regulations, section 63 page 53. The Committee's remit includes monitoring progress against educational strategic objectives, as well as monitoring the nature and level of any complaints received and ensure that appropriate action is taken in respect of them. Membership will include student representation from both an ICCA Student Representative as well as a recent alumnus of the ICCA BPTC. This student representation will allow additional student feedback to this important forum and foster engagement directly with the ICCA's leadership and Governors.

A planned annual course review will draw on available data including student feedback to update the Course Leader's Course Improvement Plan. If the opportunity arises, the ICCA will engage with course alumni on either a questionnaire or interview basis to look at and develop the transfer of knowledge and skills to the Pupillage and Work-Based Training component.