

Quality & Compliance Handbook

Effective from June 2023

Document history:

Author: Heather Newton, Academic Registrar & Head of Compliance

Approved by: Rambert School Academic Quality & Standards Board

Approval date: 22 June 2023

Review date: May 2024

For any queries regarding this handbook please contact the Academic Registrar & Head of Compliance.

Contents

| | |
|---|----|
| 1. Introduction: Quality & Compliance Framework..... | 3 |
| 2. Meeting the Office for Students' requirements and Conditions of Registration | 4 |
| Background to the OfS Conditions | 5 |
| TABLE 1: Overview of OfS Conditions of Registration | 5 |
| How the School meets its obligations and requirements as a registered Higher Education Provider with the Office for Students..... | 6 |
| TABLE 2: Summary of OfS Conditions of Registration and Additional Requirements | 7 |
| Additional Requirements | 14 |
| 3. Rambert School Governance and decision-making bodies | 15 |
| 4. School Strategies | 18 |
| 5. Access, Participation and Outreach (condition A1 and allied requirements) | 18 |
| Access & Participation Plan..... | 18 |
| 6. Consumer Law Compliance (Condition C1) | 18 |
| 7. Office of the Independent Adjudicator for Higher Education (OIAHE) Compliance (Condition C2)..... | 19 |
| OIAHE Good Practice Framework..... | 20 |
| 8. Reportable Events (Conditions E4 & F3)..... | 21 |
| What is a Reportable Event? | 21 |
| What the OfS say about Reportable Events | 21 |
| Compliance with OfS requirements regarding Reportable Events | 22 |
| Roles and Responsibilities regarding Reportable Events | 22 |
| 9. Electoral Registration of Students (Condition E5)..... | 23 |
| 10. Student Transfer Arrangements (Condition F2)..... | 24 |
| 11. Data Returns (Condition F4) | 24 |
| MEETING THE OfS 'B' CONDITIONS FOR QUALITY & STANDARDS..... | 26 |
| 12. Academic regulations, frameworks and policies | 26 |
| 13. Monitoring and Quality Assurance | 27 |
| MEETING THE OFFICE FOR STUDENTS' ADDITIONAL REQUIREMENTS | 28 |
| 14. PREVENT Duty | 28 |
| Requirements for registered providers subject to the Prevent duty – effective from 1 January 2022 | 28 |
| OfS Monitoring: Annual Prevent Return..... | 28 |
| School approach to managing PREVENT | 28 |
| 15. Freedom of Speech | 30 |
| 16. OfS Expectations for addressing and managing harassment and sexual misconduct (Condition E6)..... | 30 |
| 17. Rambert School's approach to preventing and managing harassment and sexual misconduct..... | 31 |
| Relevant responsibilities of the Board of Trustees..... | 33 |
| 18. Collaborative arrangements and delivery ('Working with Others') | 34 |
| 19. Student engagement..... | 35 |
| 20. Research..... | 35 |
| 21. Freedom of Information / Subject Access Requests | 36 |
| General relevant information | 36 |
| Freedom of Information Requests | 36 |
| Operational arrangements..... | 37 |
| 22. Policy Management and Review Schedule..... | 39 |

1. Introduction: Quality & Compliance Framework

- 1.1 This handbook provides information and guidance relating to the Rambert School's framework for managing academic and institutional standards, quality, and compliance (our 'Quality & Compliance Framework'). Our Quality and Compliance Framework encompasses the following elements:
- Meeting the Office for Students' requirements and Conditions of Registration
 - Governance and decision-making bodies
 - School Strategies and Action Plans
 - Data Returns
 - Academic regulations, frameworks and policies
 - Annual Monitoring and Year Review – OfS B & C Conditions and other requirements
 - OfS A Conditions – Access & Participation Plan (APP)
 - Standing Arrangements for Specific OfS Conditions of Registration:
 - Condition C1 - Consumer Law compliance
 - Condition C2 - OIAHE compliance
 - Condition C3 – Student Protection Plan
 - Condition E4 – Reportable Events
 - Condition E5 – Electoral Registration of Students
 - Condition F2 – Student Transfer Arrangements
 - Condition F4 – Data Returns
 - Meeting additional OfS Requirements:
 - PREVENT
 - OfS Expectations for addressing and managing harassment and sexual misconduct
 - Collaborative Arrangements and Delivery (Working with Others)
 - Student Engagement
 - Research
 - Freedom of Information / Subject Access Requests
 - Policy Review Framework
- 1.2 This Quality & Compliance framework is aligned with the relevant and applicable [Office for Students' Conditions of Registration](#) governing academic and institutional standards, quality and related compliance, particularly pertaining to students. It is designed to set out and facilitate how Rambert School meets these conditions. This Quality & Compliance Framework is also aligned with other sector standards and benchmarks (see para 1.5, below).
- 1.3 It should be noted that there is naturally some overlap of mechanisms and OfS requirements, so there is often not one sole mechanism or way of ensuring that we meet the OfS and relevant compliance requirements. For example, academic regulations, frameworks and policies are contributing factors to meeting the OfS 'B' conditions governing quality and standards, but they overlap into the F conditions (Student Transfer Arrangements) and they are not the only means via which we ensure we meet the 'B' conditions (our Terms & Conditions and our Annual Monitoring & Year Review, along with our Contextual Admissions Framework, our Student

Engagement Framework and our Working with Others Policy also – but not exhaustively – play a part in this).

- 1.4 Our [academic regulations](#) are those of our validating university, the University of Kent. All of our courses of higher education are governed by these academic regulations and the University's [Credit Framework](#). As a validated institution of the University of Kent, we have a [profile](#) on their website. Please see Section 4 of this Handbook for more academic regulatory information.
- 1.5 Our Quality & Compliance framework is also compliant with the OIAHE (the ombudsman for Higher Education student complaints) [Good Practice Framework](#), and is informed by the [UK Quality Code for Higher Education](#), as well as other higher education sector good practice guidance, such as (but not limited to) [UniversitiesUK Changing the Culture](#) and [Fair Admissions Review](#), and [Student Minds' University Mental Health Charter](#).
- 1.6 This handbook is therefore designed to assist our Trustees, staff and students to understand how we manage our statutory and legal obligations that fall within the scope of our Quality & Compliance Framework. In general, this handbook will provide a point of reference for general information, and will set out and summarise our practices and relevant policies and processes, rather than providing prescriptive policies and procedures in and of themselves. It is comprehensive, but not exhaustive. It will not address every element of institutional compliance that Rambert School is required to meet as an OfS-registered Higher Education Provider, however as outlined in 1.3 above, there will naturally be some elements that cross-over with others.
- 1.7 This handbook may be updated from time to time (including in-year) as needed.
- 1.8 Any queries about the handbook or about any of the School's policies and procedures can be addressed to the Rambert School Academic Registrar & Head of Compliance in the first instance.

2. Meeting the Office for Students' requirements and Conditions of Registration

- 2.1 When the OfS grants an application for registration for a provider, it will apply:
 - a. **The mandatory general ongoing conditions of registration.**
 - b. **The general ongoing conditions of registration that apply to the registration category for which the provider has applied.**
 - c. **Any specific ongoing conditions of registration that the OfS considers desirable to mitigate increased risk of a future breach of general ongoing conditions.**
- 2.2 Registration does not take place on a course-by-course basis. Institutions register as a whole provider and will be regulated and subject to ongoing conditions of registration on this basis. Our self-assessments and student protection plan cover all higher education students registered to Rambert School.
- 2.3 In order to continue to deliver our courses of higher education, Rambert School must be able to demonstrate at all times that we are meeting the OfS Conditions of Registration. There are also additional requirements that we must meet in order to satisfy the OfS; you can find further information about these in this Handbook.

Background to the OfS Conditions

2.4 To register – and stay registered – with the OfS providers must show that they offer high quality higher education. The OfS conditions of registration are designed to make sure they maintain these high standards.

There are three types of conditions of registration:

| | |
|---|---|
| <i>Initial conditions</i> | These are the conditions providers must meet to become registered. Most initial conditions apply to all providers. But providers seeking to register in the Approved (fee cap) category must satisfy additional requirements if they wish to charge eligible students fees up to the higher statutory fee limit, or will be in receipt of OfS grant funding when they are registered. |
| <i>General ongoing conditions</i> | These are the conditions providers must meet to stay registered. Most conditions apply to all registered providers. But providers in the Approved (fee cap) category must satisfy additional requirements if they wish to charge eligible students fees up to the higher statutory fee limit, or will be in receipt of OfS grant funding when they are registered. |
| <i>Specific ongoing conditions</i> | Specific ongoing conditions are those that OfS may decide, based on a risk assessment, to impose on an individual provider in order for it to register or to remain registered. They vary between providers but might, for example, require a provider to take a particular action to remain financially sustainable, or improve its student outcomes, or work on a particular aspect of access and participation. Specific conditions may change if the level or type of risk changes. |

2.5 Broadly, the areas covered by the OfS conditions are as follows:

TABLE 1: Overview of OfS Conditions of Registration

| OfS Conditions of Registration areas: | Number of conditions | Number of conditions that must currently be met by Rambert School | Applicable sections of this handbook (Section 8 applies to all) |
|---|-----------------------------|---|---|
| <u>A: Access and participation for students from all backgrounds</u> | 2 Conditions: A1-A2 | 1 Condition; the School falls under the requirement to meet condition A1 or A2, subject to the amount of fees the School wishes to charge. As of Summer 2022 the School falls under condition A1. | Section 5 |
| <u>B: Quality, reliable standards and positive outcomes for all students</u> | 8 Conditions: B1-B8 | Currently 5 Conditions which are mandatory for the School to meet; 1 optional condition (B6 - TEF); 2 conditions that do not apply to the School (B7 & B8) | Sections 3, 4, 7, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19 |
| <u>C: Protecting the interests of all students</u> | 4 Conditions: C1-C4 | Currently 3 Conditions; Condition C4 would apply in the event of the School “exiting the market” | Sections 6, 7, 9, 11, 12, 13, 14, 15, 16, 17, 18 |
| <u>D: Financial sustainability</u> | 1 Condition: Condition D | 1 Condition (but there are 4 contingent requirements; see Summary of OfS Conditions beginning page 5 for more details) | This Quality & Compliance Handbook does not cover this area |

Rambert School Quality & Compliance Handbook

| | | | |
|---|---------------------------|------------------|---|
| <u>E: Good governance</u> | 5 Conditions: E1-E5 | All 5 Conditions | Sections 2, 3, 4, 8 |
| <u>F: Information for students</u> | 4 Conditions: F1-F4 | All 4 Conditions | Sections 11 |
| <u>G: Accountability for fees and funding</u> | 3 Conditions: G1-G3 | All 3 Conditions | This Quality & Compliance Handbook does not cover this area |

2.6 A comprehensive summary of the initial and general ongoing conditions can be found further on in this section of the Handbook. The full version can be found on the OfS website in the [regulatory framework](#).

2.7 It should be noted that the Office for Students places additional requirements on institutions alongside the above Conditions of Registration. This handbook will address some of these requirements and how we meet them.

How the School meets its obligations and requirements as a registered Higher Education Provider with the Office for Students

- **Annual Reporting to the Board** - ensuring that the Board receives relevant reports providing them with the requisite assurances about how the School is meeting the OfS conditions of registration where they do not have direct input/sign-off of those areas)
- **Data returns** - these are made to HESA, the Higher Education Statistics Agency) and form the basis of metrics against which the School must both measure itself and also against which it will be monitored
- **Other statutory returns** - OfS eg PREVENT; Office of the Independent Adjudicator for Higher Education (OIAHE) Completion of Procedures & Procedural Return
- **Internal Quality Assurance Processes** - eg annual course monitoring; annual reports; critique and analysis – all designed to be able to demonstrate compliance with OfS Conditions
- **Policies and Procedures** - Compliant with OIA Good Practice Frameworks, consumer law, the Equality Act (2010) and OfS expectations; informed by UUK and other sector guidance
- **Published information** - along with policies and procedures, the OfS now requires institutions to make publicly available the minutes of the meetings of its governing body and committees, except where such material is genuinely confidential. This requirement is particularly aligned to compliance with condition F3. For further information see <https://www.officeforstudents.org.uk/media/98c24478-1fee-4ca6-a7ed-35bbd8d958b5/regulatory-framework-amendments-oct-2021.pdf>)
- **Public Sector Equality Duty** The Equality Duty has 3 aims. It requires public bodies to have due regard to:
 1. the need to eliminate discrimination
 2. advance equality of opportunity, and

3. foster good relations between different people when carrying out their activities.

Areas covered by the Public Sector Equality Duty include:

- Equality duty
 - General duty
 - Due regard
 - Specific duties
 - Publication of information
 - Equality objectives
 - Examples of information to collect for staff and students
- Part of how the School can demonstrate it meets the Public Sector Equality Duty is enshrined in the data collection and submission requirements that we have to meet to ensure compliance with the OfS conditions of registration.

A summary of the OfS Conditions of Registration and Additional Requirements can be found in Table 2 below.

TABLE 2: Summary of OfS Conditions of Registration¹ and Additional Requirements

| OfS Conditions of Registration areas: | Initial / General Ongoing Condition? | Summary of Condition | | Rambert School mechanisms / arrangements for meeting condition |
|---|--------------------------------------|----------------------|---|--|
| A: Access and participation for students from all backgrounds | Initial & General Ongoing | A1 | <p>An Approved (fee cap) provider intending to charge fees above the basic amount...must:</p> <ol style="list-style-type: none"> 1. have in force an Access and Participation Plan approved by the OfS 2. Take all reasonable steps to comply with the provisions of the plan | <p>This area is led by Head of Participation, Outreach & Widening Participation. The Head of Admissions, Registry & Student Support holds responsibility for monitoring progress against the APP.</p> <p>Oversight of this area managed by Academic Quality & Standards Board (via Widening Participation Committee)</p> <p>School Access & Participation Plan and its requirements overseen by Widening Participation Committee (reporting to Academic Quality & Standards Board)</p> |

¹ Conditions that are optional for Rambert School to comply with are shaded in light grey. Conditions that do not apply to Rambert School are shaded in dark grey, but included for completeness.

| | | | | |
|--|---------------------------|----|--|---|
| | Initial & General Ongoing | A2 | <p>An Approved provider or an Approved (fee cap) provider charging fees up to the basic amount to qualifying persons on qualifying courses must:</p> <ol style="list-style-type: none"> 1. Publish an access and participation statement. 2. Update and re-publish this statement on an annual basis. | N/A |
| <p>B: Quality, reliable standards and positive outcomes for all students *Under current guidance, an institution with fewer than 500 students does not have to apply for TEF</p> | General Ongoing Condition | B1 | <p><u>Academic Experience</u> The provider must ensure that the students registered on each higher education course receive a high quality academic experience.</p> <p>A high quality academic experience includes but is not limited to ensuring that each higher education course:</p> <ol style="list-style-type: none"> 1. Is up-to-date; 2. Provides educational challenge; 3. Is coherent; 4. Is effectively delivered; and 5. Requires students to develop relevant skills. | <p>Oversight of this area managed by Academic Quality & Standards Board supported in particular by its Learning & Teaching Committee, and the Senior Management Team.</p> <p>Mechanisms: Annual Monitoring (see section 9 'Monitoring and Quality Assurance'). This is jointly managed by the School and the University of Kent as validator.</p> |
| | General Ongoing | B2 | <p><u>Resources, support and student engagement</u> The provider must take all reasonable steps to ensure:</p> <ol style="list-style-type: none"> 1. Students registered on a higher education course receive resources and support to ensure: <ol style="list-style-type: none"> a. A high quality academic experience for those students; and b. Those students succeeding in and beyond higher education; and 2. Effective engagement with students to ensure: <ol style="list-style-type: none"> a. A high quality academic experience for those students; and b. Those students succeed in and beyond higher education. | <p>Oversight of this area managed by Academic Quality & Standards Board and Senior Management Team</p> <p>Mechanisms: Annual Monitoring (see section 13 'Monitoring and Quality Assurance') Student Engagement Framework (see Section 19 'Student Engagement') Student Staff Consultative Committee (reporting to Academic Quality & Standards Board) Student Focus Groups (feeding directly into Senior Management)</p> |

| | | | | |
|--|---------------------------|----|---|---|
| | Initial & General Ongoing | B3 | <p><u>Baselines for student outcomes indicators</u></p> <p>The provider must deliver successful outcomes for all its students, which are recognised and valued by employers, and/or enable further study</p> | <p>Oversight of this area managed by Academic Quality & Standards Board and Senior Management Team</p> <p>Mechanisms: Annual Monitoring (see section 13 'Monitoring and Quality Assurance')</p> |
| | General Ongoing | B4 | <p><u>Assessment and Awards</u></p> <p>The provider must ensure that:</p> <ol style="list-style-type: none"> 1. Students are assessed effectively; 2. Each assessment is valid and reliable; 3. Academic regulations are designed to ensure that relevant awards are credible; 4. Academic regulations are designed to ensure effective assessment of technical proficiency in the English language in a manner that appropriately reflects the level and content of the course; and 5. Relevant awards granted to students are credible at the point of being granted and when compared to those granted previously | <p>This area jointly led by Academic Registrar & Head of Compliance and Head of Studies, with some responsibility resting with the University of Kent as validator (B4 sections 3, 4 & 5)</p> <p>Oversight of this area managed by Academic Quality & Standards Board, reporting to University of Kent as required.</p> <p>Mechanisms: Exam Boards are conducted by the School in collaboration with the University of Kent, who maintain oversight as the primary responsible body.</p> <p>The University of Kent's academic regulations are followed at all times throughout course delivery, assessment and awards.</p> |
| | General Ongoing | B5 | <p><u>Sector recognised standards</u></p> <p>The Provider must ensure that in respect of any relevant awards granted to students who complete a higher education course provided by, or on behalf of, the provider (whether or not the provider is the awarding body):</p> | <p>This area is led by Head of Studies although primary responsibility lies with University of Kent as validator</p> <p>Oversight of this area managed by Academic</p> |

| | | | | |
|--|---------------------------|-----|---|--|
| | | | <ol style="list-style-type: none"> Any standards set appropriately reflect any applicable sector-recognised standards; and Awards are only granted to students whose knowledge and skills appropriately reflect any applicable sector-recognised standards | Quality & Standards Board Mechanisms: See Meeting the OfS 'B' Conditions for Quality & Standards (sections 12 & 13 of this handbook) |
| | Initial & General Ongoing | B6* | The provider must participate in the Teaching Excellence and Student Outcomes Framework | <i>This is optional for Rambert School</i> Oversight of this area managed by Academic Quality & Standards Board |
| | Initial | B7 | Quality – applies to applications for registration made on/after 1 May 2022 | N/A |
| | Initial | B8 | Standards – applies to applications for registration made on/after 1 May 2022 | N/A |
| <u>C: Protecting the interests of all students</u> | Initial & General Ongoing | C1 | The provider must demonstrate that in developing and implementing its policies, procedures and terms and conditions, it has given due regard to relevant guidance about how to comply with consumer protection law. | This area is led by Academic Registrar & Head of Compliance Oversight of this area managed by Academic Quality & Standards Board (see Section 5 'Consumer Law Compliance: Condition C1') |
| | General Ongoing | C2 | The provider must: <ol style="list-style-type: none"> Co-operate with the requirements of the student complaints scheme run by the Office of the Independent Adjudicator for Higher Education (OIA/OIAHE), including the subscription requirements. Make students aware of their ability to use the scheme. | This area is led by Academic Registrar & Head of Compliance (the institutional OIA Point of Contact) Oversight of this area managed by School Senior Management Team, reporting to the Board of Trustees (HR Committee receives an annual Student Casework report) Student Handbooks and all student-related policies set out key information for using the OIA Scheme |

| | | | | |
|---|---------------------------|----|---|--|
| | Initial & General Ongoing | C3 | <p>The provider must:</p> <ol style="list-style-type: none"> 1. Have in force and publish a Student Protection Plan which has been approved by the OfS as appropriate for its assessment of the regulatory risk presented by the provider and for the risk to continuation of study of all its students 2. Take all reasonable steps to implement the provisions of the plan if the events set out in the plan take place 3. Inform the OfS of events, except for the closure of an individual course, that require the implementation of the provisions of the plan | <p>This area is led by Academic Registrar & Head of Compliance</p> <p>Oversight of this area is managed by Senior Management Team reporting to the Board of Trustees (Risk & Audit Committee with approval of the Student Protection Plan by full Board)</p> |
| | General Ongoing | C4 | [Compliance requirements relating to Student Protection Plans] governing 'Market Exit' | <i>Only applicable in the event of the School closing.</i> |
| D: Financial sustainability | Initial & General Ongoing | D | <p>The provider must:</p> <ol style="list-style-type: none"> 1. Be financially viable. 2. Be financially sustainable. 3. Have the necessary financial resources to provide and fully deliver the higher education courses as it has advertised and as it has contracted to deliver them. 4. Have the necessary financial resources to continue to comply with all conditions of its registration. | <p>This area is led by the Chief Financial Officer</p> <p>Oversight of this area is managed by Senior Management Team reporting to the Board of Trustees via its Finance & Premises Committee with sign-off from the full Board</p> |
| E: Good governance | Initial & General Ongoing | E1 | The providers governing documents must uphold the public interest governance principles that are applicable to the provider. | This area is led by the Chief Financial Officer (as Company Secretary) |
| | Initial & General Ongoing | E2 | <p>The provider must have in place adequate and effective management and governance arrangements to:</p> <ol style="list-style-type: none"> 1. Operate in accordance with its governing documents. 2. Deliver, in practice, the public interest governance principles that are applicable to it. | <p>Compliance with this condition of registration is led by the Chief Financial Officer and the Academic Registrar & Head of Compliance:</p> <p>Area 1 & 2 are led by the Chief Financial Officer.</p> |

| | | | | |
|--|-----------------|----|--|--|
| | | | <p>3. Provide and fully deliver the higher education courses advertised.</p> <p>4. Continue to comply with all conditions of its registration.</p> | <p>Area 3 is led by the Academic Registrar & Head of Compliance.</p> <p>Area 4 is jointly led by the Academic Registrar & Head of Compliance & the Chief Financial Officer.</p> |
| | General Ongoing | E3 | <p>The governing body of a provider must:</p> <ol style="list-style-type: none"> 1. Accept responsibility for the interactions between the provider and the OfS and its designated bodies. 2. Ensure the provider's compliance with all its conditions of registration and with the OfS's accounts direction. 3. Nominate to the OfS a senior officer as the 'accountable officer' who has the responsibilities set out by the OfS for an accountable officer from time to time | <p>This area is led by members of the Senior Management Team according to need and context.</p> <p>Oversight of this area is managed by Senior Management Team reporting to the Board of Trustees and AQSBS as appropriate according to context.</p> <p>The Chief Executive, Principal & Artistic Director is the nominated Accountable Officer.</p> |
| | General Ongoing | E4 | <p>The governing body of the provider must notify the OfS of any change of which it becomes aware which affects the accuracy of the information contained in the provider's entry in the Register.</p> | <p>This area is led by Academic Registrar & Head of Compliance (SPOC for Reportable Events)</p> <p>See also Reportable Events Policy & Procedure (see Section 7 'Reportable Events, Conditions E4 & F3').</p> |
| | General Ongoing | E5 | <p>The provider must comply with guidance published by the OfS to facilitate, in co-operation with electoral registration officers, the electoral registration of students.</p> | <p>This area is led by Academic Registrar & Head of Compliance, supported by the Head of Admissions, Registry & Student Support</p> <p>Information about electoral registration is in Student Handbooks; reminders to register are issued periodically (see Section 8 'Electoral Registration of Students')</p> |

| | | | | |
|--|-----------------|----|--|--|
| <u>F: Information for students</u> | General Ongoing | F1 | The provider must provide to the OfS, and publish, in the manner and form specified by the OfS, the transparency information set out in Section 9 of the HERA. | This area is led by Academic Registrar & Head of Compliance, supported by the Data Manager. |
| | General Ongoing | F2 | The provider must provide to the OfS, and publish, information about its arrangements for a student to transfer. | This area is led by Academic Registrar & Head of Compliance. The School Student Transfer Arrangements Statement is <u>published on the School's website</u> and reviewed regularly. |
| | General Ongoing | F3 | For the purpose of assisting the OfS in performing any function, or exercising any power, conferred on the OfS under any legislation, the governing body of a provider must: 1. Provide the OfS [...] with such information as the OfS specifies at the time and in the manner and form specified. 2. Permit the OfS to verify, or arrange for the independent verification by a person nominated by the OfS of such information as the OfS specifies at the time and in the manner specified and must notify the OfS of the outcome of any independent verification at the time and in the manner and form specified. 3. Take such steps as the OfS reasonably requests to co-operate with any monitoring or investigation by the OfS, in particular, but not limited to, providing explanations or making available documents to the OfS or a person nominated by it, or making available members of staff to meet with the OfS or a person nominated by it. | This area is led by the Chief Executive, Principal & Artistic Director as Accountable Officer, supported by the School's Senior Management Team. The Accountable Officer may delegate any duties or roles in relation to this condition of registration to any member of the School Senior Management Team as appropriate and relevant. Oversight of this area is managed by Senior Management Team reporting to the Board of Trustees as appropriate according to context. |

| | | | | |
|---|-----------------|----|---|--|
| | General Ongoing | F4 | For the purposes of the designated data body (DDB)'s duties under sections 64(1) and 65(1) of HERA, the provider must provide the DDB with such information as the DDB specifies at the time and in the manner and form specified by the DDB. | <p>This area is led by the Academic Registrar & Head of Compliance, supported by the Data Manager and the Chief Financial Officer</p> <p>Oversight of this area is managed by the Executive Action Group (Data), reporting as necessary to Senior Management Team/the Board/AQSB</p> |
| <u>G: Accountability for fees and funding</u> | General Ongoing | G1 | A provider in the Approved (fee cap) category must charge qualifying persons on qualifying courses fees that do not exceed the relevant fee limit determined by the provider's quality rating and its Access and Participation Plan. | <p>This area is led by the Chief Financial Officer</p> <p>Oversight of this area is managed via the Chief Financial Officer reporting to the Board of Trustees via its Finance & Premises Committee</p> |
| | General Ongoing | G2 | The provider must comply with any terms and conditions attached to financial support received from the OfS and UK Research and Innovation (UKRI) under sections 41(1) and/or 94(2) of HERA. A breach of such terms and conditions will be a breach of this condition of registration. | <p>This area is led by the Chief Financial Officer</p> <p>Oversight of this area is managed via the Chief Financial Officer reporting to the Board of Trustees via its Finance & Premises Committee</p> |
| | General Ongoing | G3 | <p>The provider must pay:</p> <ol style="list-style-type: none"> 1. Its annual registration fee and other OfS fees in accordance with regulations made by the Secretary of State. 2. The fees charged by the designated bodies. | <p>This area is led by the Chief Financial Officer</p> <p>Oversight of this area is managed via the Chief Financial Officer reporting to the Board of Trustees via its Finance & Premises Committee</p> |

Additional Requirements

2.6 In addition to meeting the OfS Conditions of Registration, Rambert School must ensure it is monitoring, addressing and/or meeting additional requirements and expectations of the OfS. Below is a non-exhaustive list of additional requirements in place as of Summer 2022, but it is anticipated there may be changes/developments/more requirements by the end of 2022-23:

| Additional Requirement | Submitted/Reported to | Who to contact in School for queries/information |
|---|--|---|
| <ul style="list-style-type: none"> • PREVENT Duty monitoring and annual return | Office for Students | Academic Registrar & Head of Compliance |
| <ul style="list-style-type: none"> • PROTECT & PREPARE Duty (Martyn's Law)² | Office for Students | Academic Registrar & Head of Compliance |
| <ul style="list-style-type: none"> • Reportable Events | Office for Students | Academic Registrar & Head of Compliance |
| <ul style="list-style-type: none"> • Access & Participation Plan returns as and when specified | Office for Students | Head of Participation, Outreach & Widening Participation |
| <ul style="list-style-type: none"> • Annual Financial Return & other associated returns | Office for Students | Chief Finance Officer |
| <ul style="list-style-type: none"> • Higher Education Innovation Fund Annual Monitoring Statement | Research England & Office for Students | Chief Financial Officer <i>As of 2022 not currently in receipt of this funding</i> |
| <ul style="list-style-type: none"> • National Student Survey compliance | Office for Students | Academic Registrar & Head of Compliance / Data Manager |
| <ul style="list-style-type: none"> • Assurance on meeting OfS Statement of Expectations to Prevent and Address Harassment & Sexual Misconduct / Condition E6 | Office for Students | Academic Registrar & Head of Compliance |
| <ul style="list-style-type: none"> • Higher Education Business & Community Interaction Survey | HESA, who submit it to UK Research & Innovation (UKRI) | Chief Finance Officer |
| <ul style="list-style-type: none"> • OIA Completion of Procedures Return | Office of the Independent Adjudicator for Higher Education (OIAHE) | Academic Registrar & Head of Compliance |
| <ul style="list-style-type: none"> • OIA Annual Policies & Procedures return | OIAHE | Academic Registrar & Head of Compliance |

3. Rambert School Governance and decision-making bodies

Governance

3.1 Rambert School is governed by the Board of Trustees. Information about the School's Trustees can be found here: <https://www.rambertschool.org.uk/school/patrons-trustees/>.

3.2 Any queries relating to the Board should be directed to the Chief Financial Officer or the Chief Executive, Principal & Artistic Director.

² This is not yet in effect at the time of producing this handbook, but it is assumed the Office for Students rather than the DfE will undertake the monitoring of compliance in this area for higher education institutions.

Institutional decision-making

3.3 Rambert School has several decision-making bodies, working across different areas. As a small School, we have a lot of cross-over and staff often sit on several committees and groups which make strategic and policy decisions that ensures the School is doing what it needs to in order to meet its legal and statutory obligations not only as a registered Higher Education Provider with the Office for Students, but also as a registered charity and publicly-funded educational institution.

3.4 Below is a table of internal decision-making bodies in Rambert School and a summary of their individual remits:

| Decision-making Body | Reports to | Remit/Area of oversight |
|--|---|---|
| Academic Quality & Standards Board | N/A – Holds overall responsibility for the School in its remit. Communicates matters of interest to the Board of Trustees | Academic matters (oversight of Learning, Teaching & Assessment); Academic-related matters (eg academic quality, admissions, student academic and pastoral support, consumer law compliance, annual quality & compliance monitoring, policy) |
| Learning & Teaching Committee | Academic Quality & Standards Board | Courses, learning, teaching, assessment and related matters; Work required by validating university |
| Equality, Diversity & Inclusion Committee | Academic Quality & Standards Board. Communicates matters of interest to the Board of Trustees. | Public Sector Equality Duty and compliance with the Equality Act (2010); Anti-discrimination & social justice; Inclusivity; Student and staff welfare; Relevant policies |
| Research & Ethics Committee | Academic Quality & Standards Board | Ethical scrutiny and approval of staff research projects; Research strategy |
| Student Consultative Committee | Academic Quality & Standards Board | Student engagement framework; Student interests (both academic and non-academic); Student consultations |
| Widening Participation Committee | Academic Quality & Standards Board | Access and Participation Plan; widening access, success and progression activities and strategy |
| Board of Trustees | N/A – Holds overall responsibility for School in its remit | Institutional: <ul style="list-style-type: none"> - Accountability - Sustainability - Reputation |

Rambert School Quality & Compliance Handbook

| | | |
|---|--|---|
| | | <ul style="list-style-type: none"> - Inclusion & Diversity - Effectiveness - Engagement - Additional OfS requirements |
| Risk and Audit Committee | Board of Trustees | Risk Management; Audit |
| Finance & Premises Committee | Board of Trustees | Financial governance and accounting |
| HR Committee | Board of Trustees | Recruitment and retention; Relevant Policies; Student cases; Safeguarding and PREVENT |
| | | |
| Executive Team | Chief Executive, Principal & Artistic Director | Delegated responsibility by the Board of Trustees for setting the School's priorities, informed by the Senior Management Team, Executive Action Group and Academic Quality and Standards Board |
| Senior Management Team | Chief Executive, Principal & Artistic Director | Delegated responsibility by the Board of Trustees for matters relating to the day-to-day management and operations of the School; Strategic matters; Requirements of School and/or the Board of Trustees |
| Executive Action Group | N/A – Holds overall responsibility for School in its remit. Communicates matters of interest to Senior Management Team, Academic Quality & Standards Board and Board of Trustees as relevant and applicable. Consults, considers and makes decisions on behalf of Academic Quality & Standards Board and on behalf of the School as necessary and appropriate. | Matters requiring urgent decisions; Initial consultations on School policy / ideas / suggestions; Policy / Strategy / strategic approvals following consultations; Scrutiny of work and ideas; Consumer law; Use of the Emergency Powers of Exclusion & Suspension or Precautionary Measures (if required) |

3.5 Any queries regarding membership of any of the above decision-making bodies should be addressed to the Chief Executive, Principal & Artistic Director in the first instance, and/or can be raised via line managers.

4. School Strategies

- 4.1 As a small specialist and dynamic institution, Rambert School has a small number of strategies however we prefer to maintain a focus on actions and initiatives that make a tangible difference and can be easily embedded. For these reasons, where it is the sector norm to have a strategy in a particular area (eg Equality, Diversity & Inclusion), we may not have a strategy but may well have an Action Plan that is monitored and kept under regular review, as a more effective and less bureaucratic way of meeting our institutional aims and affording greater agility.
- 4.2 Notwithstanding the above, the School does have the following strategies and Strategic Action Plans, which are supported by work collectively undertaken by staff and students:
- **Rambert School Strategic Plan**
 - **Access and Participation Plan**
 - **Learning & Teaching Action Plan**
 - **Contextual Admissions Framework**
 - **Student Engagement Framework**
 - **PREVENT Strategy**
- 4.3 Any questions regarding School strategies or strategic action plans/frameworks should be addressed to the Chief Executive, Principal & Artistic Director in the first instance.
-

5. Access, Participation and Outreach (condition A1 and allied requirements)

Access & Participation Plan

- 5.1 An Access & Participation Plan (APP) is required by the Office for Students for institutions that want to access the higher fee cap of £9,250 per year. A percentage of this Higher Fee Income is required to be redistributed to ensure fair access, success and progression to students who are under-represented across Higher Education.
- 5.2 The APP is authored by the institution, and submitted for approval by OfS, where it goes under a period of scrutiny. The APP is then published on the OfS and the institution's website. (See Rambert School's APP here: <https://www.rambertschool.org.uk/courses/policies-and-procedures/>).
- 5.3 The APP contains targets and metrics by which the School measures its performance in this area; this performance is also monitored by the OfS as part of its assurance that the institution is meeting OfS Registration Condition A1. This means that all APP activity must be well evaluated, and yearly internal monitoring processes are required to take place, as well as externally to the OfS.
- 5.4 Any queries relating to the Access and Participation Plan or to other widening access activities, should be addressed to the Head of Participation, Outreach & Widening Participation.
-

6. Consumer Law Compliance (Condition C1)

- 6.1 As a higher education provider registered with the Office for Students, and in accordance with the Higher Education & Research Act (2017), Rambert School is required to comply with consumer law in the delivery of its courses of higher education and in meeting our obligations to students.

- 6.2 To help staff understand the School's obligations relating to Consumer Law, we have the Consumer Law Handbook. Although staff involved in various areas of admissions are often assumed to hold responsibility for ensuring compliance with Consumer Law, all staff hold a responsibility in this regard (for example, any verbal information communicated by staff on an Open Day to an applicant falls under Consumer Law, and the School can be held accountable for it).
- 6.3 The Consumer Law Handbook is held internally and shared with relevant staff. A copy can be obtained from the Academic Registrar & Head of Compliance.
- 6.4 **The School manages its obligations with regard to Consumer Law in the following ways:**
- 6.1.1 **Student contracts** (Terms and Conditions) are drafted and overseen by the Academic Registrar & Head of Compliance;
 - 6.1.2 The Academic Registrar & Head of Compliance oversees **Admissions Policies, Fees Policies, Bursary Policies, Course Summary Documents** and **Offer Letters**, working with relevant staff;
 - 6.1.3 The Academic Registrar & Head of Compliance ensures that routes of complaint and appeal regarding admissions are clear and meet the required sector standards via our **Admissions Appeals and Complaints Policy & Procedure**;
 - 6.1.4 The School ensures that staff involved in the administration of admissions and the management of website content are knowledgeable about **'pre-contract information'** and **'material information'**;
 - 6.1.5 **Guidance notes** are issued to students and applicants as applicable when there are any material changes to existing contracts or published material information;
 - 6.1.6 The School **monitors its compliance** with Consumer Law via its **Annual Quality & Compliance Review**, a copy of which is circulated to all staff and students and to the Board of Trustees
-

7. Office of the Independent Adjudicator for Higher Education (OIAHE) Compliance (Condition C2)

- 7.1 The Office of the Independent Adjudicator for Higher Education (OIAHE, commonly referred to in the sector as 'OIA') is the ombudsman for student complaints. Rambert School subscribes to its scheme, which is a requirement to meet **OfS Condition C2**.
- 7.2 The OIA operates a free scheme for students who have exhausted their internal student complaints and/or appeal procedures to use, whereby subject to meeting the OIA's criteria, the student can request a review of their case by the ombudsman. To use the scheme, students must have a **Completion of Procedures (CoP) Letter** issued by the School and submit a complaint to the OIA within 12 months of the date of the CoP Letter. For cases they review, the OIA either find the student's case 'justified', 'partly justified' or 'not justified'.
- 7.3 Where the OIA finds a case justified or partly justified, they may make recommendations including financial compensation from the School and other remedial actions. The case may also be published publicly on the OIA's website, and noted by the OfS. In extreme cases, we may have to notify the OfS of a 'Reportable Event' arising from a student case.

OIAHE Good Practice Framework

- 7.4 The OIA has produced a '[Good Practice Framework](#)' with which all of Rambert School student-related policies and procedures are aligned. This provides a robust set of principles that ensure our policies and procedures are not only fit for purpose, but are in line with higher education sector expectations and requirements.
- 7.5 There are currently 6 sections of the Good Practice Framework. These are:
- **Handling Complaints and Academic Appeals**
 - **Delivering Learning Opportunities with Others**
 - **Supporting Disabled Students**
 - **Requests for Additional Consideration**
 - **Fitness to Practise**
 - **Disciplinary Procedures**
- 7.6 There are **10 principles of the Good Practice Framework**, which underpin and are built into all of our student-related policies. These are:

| Good Practice Framework Principles (from December 2022) |
|--|
| <p>Good Processes are:</p> <ul style="list-style-type: none"> • Accessible and Clear • Fair, Independent and Confidential • Inclusive • Flexible, proportionate and timely <p>And they</p> <ul style="list-style-type: none"> • Improve the Student Experience |

- 7.7 **The School manages its obligations with regard to the OIAHE in the following ways:**
- 7.4.1 The Academic Registrar & Head of Compliance, who has over 15 years' experience of working with the OIA, is the **OIA's institutional Single Point of Contact** for the School and holds responsibility for ensuring compliance with the OIA's requirements;
- 7.4.2 The School's **student-related policies and procedures** are all written to adhere to the principles and the applicable sections of the OIA's Good Practice Framework;
- 7.4.3 The Academic Registrar & Head of Compliance drafts and issues **Completion of Procedures Letters** (normally referred to as 'CoP Letters') to students on behalf of the School so that they can, should they wish, take their case to the OIA;
- 7.4.4 The School submits an **annual return** (prepared and submitted by the Academic Registrar & Head of Compliance) **of its applicable policies and procedures** to the OIA as required by the ombudsman;
- 7.4.5 The School submits an **annual return** (prepared and submitted by the Academic Registrar & Head of Compliance) **detailing the number of CoP Letters issued** in the

previous calendar year³ and the categories of student cases for which these have been issued.

- 7.8 Any queries relating to the OIAHE or the Good Practice Framework, or any of the relevant student-related policies to which these apply, should be addressed to the Academic Registrar & Head of Compliance.

8. Reportable Events (Conditions E4 & F3)

What is a Reportable Event?

What the OfS say about Reportable Events

- 8.1 In October 2022, the OfS published the following [information](#) about Reportable Events:

[Reportable events](#) are an important component of our risk-based approach to regulation. They contain information from a provider that is directly relevant to our regulatory activity. We use this to update our assessment of the risk that a provider may breach its conditions of registration and consider whether any intervention is necessary.

It is important that we consider the information in incoming reportable events quickly so that we have up-to-date risk assessments. If our approach for reportable events is efficient, we would expect short resolution times and few unresolved cases.

- 8.2 In accordance with the [OfS Guidance on Reportable Events](#) published in October 2021 and effective from 1 January 2022, the Regulatory Framework defines Reportable Events as follows:

11. The regulatory framework defines a reportable event as: A reportable event is any event or matter that, in the reasonable judgement of the OfS, negatively affects or could negatively affect:

- a. The provider's eligibility for registration with the OfS.*
- b. The provider's ability to comply with its conditions of registration.*
- c. The provider's eligibility for degree awarding powers, or its ability to comply with the criteria for degree awarding powers, where the provider:*
 - i. holds degree awarding powers; or*
 - ii. has submitted an application for degree awarding powers to the OfS, and for which the OfS has yet to reach a final decision.*
- d. The provider's eligibility for university title, where the provider:*
 - i. holds university title; or*
 - ii. has submitted an application for university title to the OfS, and for which the OfS has yet to reach a final decision. In interpreting 'the reasonable judgement of the OfS', the OfS will, as a matter of policy, consider whether a reasonable provider intent on complying with all of its conditions of registration and acting in the interests of students and taxpayers (rather than in its own commercial, reputational or other interests), would consider the event or matter to be material.*

³ The OIA returns are managed on a 'calendar year' rather than an 'academic year' basis; the OIA's annual reports are similarly issued on a calendar year basis.

- 8.3 The only definition of Reportable Events that currently applies to Rambert School from the overall definitions above is definition 11 b: *A reportable event is any event or matter that, in the reasonable judgement of the OfS, negatively affects or could negatively affect...the provider's ability to comply with its conditions of registration.*
- 8.4 The Regulatory Framework for Higher Education in England along with regulatory notices and regulatory advice (as referenced above) can be found here: <https://www.officeforstudents.org.uk/advice-and-guidance/regulation/the-regulatory-framework-for-higher-education-in-england/>

Compliance with OfS requirements regarding Reportable Events

- 8.5 In order to help us manage our compliance with OfS Conditions E4 and F3 which both govern Reportable Events, we have a Reportable Events RECORD OF DECISION FORM template. This utilises the illustrative examples provided by the OfS in its guidance, and helps us document our decision-making. The key considerations for determining whether an event or matter constitutes a reportable event are:
- **Does the event/matter in question fall into one or more of the categories provided as illustrative examples by the OfS guidance** (which are incorporated into our decision-making template)?
 - **Does the event/matter satisfy the 'materiality test'?** (i.e. does it or could it negatively affect our ability to comply with any of the OfS Conditions of Registration that apply to us?)
- 8.6 Further to the above, there is therefore a range of incidents that might constitute a Reportable Event. This could be anything from a change to the structure of the School that has a significant financial, governance or other impact, to a new Chief Executive, to an investigation by any accrediting body (including our validating university) to a report or allegation of serious fraud.
- 8.7 The likelihood of the School needing to make a Reportable Event to the OfS is overall assessed by the School as low, but must be continuously monitored and relevant records kept of how the School has reached any decision on whether an event or matter constitutes a Reportable Event.
- 8.8 The OfS provides non-exhaustive [guidance](#) about Reportable Events, and following independent registration with the OfS the School has a Policy and Procedure (see further on in this section) for assessing and determining whether or not an event or matter constitutes a Reportable Event that requires to be reported to the Office for Students. This procedure also helps to ensure that the School has a consistent, rigorous and robust process for determining and recording the assessment and decision-making regarding possible Reportable Events.
- 8.9 As at 28 April 2022, the maximum length of time stated by the Office for Students for resolving a Reportable Event was 53 days. This is the most up to date information at the time of producing this Handbook.
- 8.10 The Rambert School Reportable Events Policy and Procedure has been developed following the relevant OfS guidance: <https://www.officeforstudents.org.uk/media/2d8c85eb-98ad-4039-bd98-f19f0bfff303/ra16-reportable-events-october2021.pdf>

Roles and Responsibilities regarding Reportable Events

- 8.11 The Academic Registrar & Head of Compliance holds strategic and managerial responsibility for Reportable Events, including making Reportable Events submissions to the Office for Students. This may include seeking guidance from the OfS where strictly necessary.

- 8.12 Where the Academic Registrar is unable to fulfil any of their normal duties regarding Reportable Events as set out in this Policy and its procedures, the Chief Executive, Principal & Artistic Director may undertake or delegate any or all of these duties, as deemed necessary and appropriate.
- 8.13 Where duties are delegated, the Chief Executive, Principal & Artistic Director and the Academic Registrar & Head of Compliance will both be kept informed throughout the process and will be copied into all correspondence.
- 8.14 The Board of Trustees holds responsibility for the monitoring and oversight of Reportable Events. This is managed via the following:
- 8.14.1 Reportable Events is a standing agenda item on the Board of Trustees' Agenda;
 - 8.14.2 The Chair of the Board and the Chair of Risk and Audit Committee are notified in the event of a Reportable Event needing to be made;
 - 8.14.3 An annual report on Quality & Compliance sets out the annual record of whether any Reportable Events have needed to be made, including whether any assessments of possible Reportable Events have been undertaken.
 - 8.14.4 Risk and Audit Committee may as necessary, approve policies, procedures and protocols relating to Reportable Events and the institutional management of them.
- 8.15 Any questions relating to Reportable Events, including any policy queries, should be addressed to the Academic Registrar & Head of Compliance.
-

9. Electoral Registration of Students (Condition E5)

- 9.1 OfS Condition E5 states:

Condition C1: "The provider must comply with guidance published by the OfS to facilitate, in co-operation with electoral registration officers, the electoral registration of students."

- 9.2 Rambert School manages its compliance with this condition via the following mechanisms:

- Information about electoral roll registration is produced by the School in accordance with information published by the Electoral Commission;
- This information is published in the Undergraduate and Postgraduate Student Handbooks and also includes details about eligibility to vote;
- A reminder is sent out on Teams to all students at the start of the academic year, pointing them explicitly to the information published in the Handbooks, and students are advised to contact key staff with any queries;
- The published information makes clear to students that in the event an Electoral Registration Officer (ERO) contacts the School under regulation 23 of the Representation of the People (England and Wales) Regulations 2001, the School would be obliged to comply with any such request for information required by the ERO for the purposes of maintaining the electoral register;
- The published information is reviewed annually to ensure that it remains up to date and accurate;

- Reminders about electoral roll registration are sent to students in advance of any upcoming elections.

9.3 Any queries regarding this area should be addressed to the Academic Registrar & Head of Compliance.

10. Student Transfer Arrangements (Condition F2)

10.1 OfS Condition F2 states:

Condition F2: “The provider must provide to the OfS, and publish, information about its arrangements for a student to transfer.”

10.2 To ensure that we comply with this condition, the School publishes a [‘Student Transfer Arrangements Statement’](#) on its policies and procedures page on the School website. This is periodically reviewed to ensure it remains up to date and accurate.

10.3 Any queries regarding this area should be addressed to the Academic Registrar & Head of Compliance.

11. Data Returns (Condition F4)

11.1 OfS Condition F4 states:

Condition F4: “For the purposes of the designated data body (DDB)’s duties under sections 64(1) and 65(1) of HERA⁴, the provider must provide the DDB with such information as the DDB specifies at the time and in the manner and form specified by the DDB.

11.2 The Designated Data Body (DDB) is JISC (Joint Informations Systems Committee, the UK’s digital body for tertiary education). In 2022 it merged with HESA (the Higher Education Statistics Agency) which had previously been the DDB. HESA have moved to JISC, creating a new Data Collection and Statistics Directorate. This merger means the responsibility for collecting and publishing statutory data for all higher education institutions across the UK now lies with JISC.

11.3 Despite the merger, however, HESA’s brand still continues and its website remains as a data-hosting platform. This means that operationally, Rambert School communicates with and refers internally to HESA rather than JISC in relation to data returns.

11.4 The Academic Registrar & Head of Compliance oversees this area, with day-to-day management and operation of all statutory data returns led by the Data Manager, supported by staff in Registry. Institutional governance oversight of this area is managed by the Executive Action Group (Data), reporting as necessary to the School’s Senior Management Team, the Board of Trustees and the Academic Quality & Standards Board as appropriate and necessary.

11.5 Data returns are made throughout the academic year, and broadly cover the following areas:

11.5.1 **Student numbers return** (both predicted and actual, which impact funding allocated to the School by the Office for Students alongside informing metrics used by the OfS to measure the School’s compliance)

11.5.2 **Staff return** (relative to academic/artistic staff)

⁴ Higher Education and Research Act 2017

11.5.3 Financial return

- 11.6 The data collected on students in particular covers a range of areas, including but not limited to:
- Personal characteristics
 - Place of study
 - Courses and modules they are undertaking
 - Entry qualifications
 - Socio-economic backgrounds
 - Progression through higher education and the qualifications both aimed for and achieved

Data Futures

- 11.7 'Data Futures' is a sector-wide data collection exercise, commencing in 2022-23 academic year. It focuses on collecting student data at the module level, rather than programme level as has previously been the case. This makes the data collection far more complex and comprehensive than previously.
- 11.8 From its launch in 2022-23, Data Futures will be an annual collection for 2022-23 and 2023-24 academic years. From 2024-25, Data Futures will replace the previous approach of only collecting the student course data once a year, to collecting 'in-year' (with effect from academic year 2024-25). In-year collection requirements will mean the School must make 2 individualised student data collections per academic year.

Internal data management systems

- 11.9 As of September 2022, Rambert School has a Student Management System ("OnPointe") under license from the Central School of Ballet (CSB). For the duration of the applicable Service Level Agreement, Rambert has the right to use CSB's intellectual property solely for the purpose of using the services and work product provided by CSB in accordance with the agreement. The purpose of this system is to collect and submit data for the Higher Education Statistics Agency (HESA) Data Futures and the Office for Students (OfS) Higher Education Students Early Statistics (HESES) returns. The system also provides reliable and consistent data supporting internal analysis and evaluation (e.g. access and participation) and external reporting (e.g. the Annual Finance return).
- 11.10 The agreement in place with CSB also includes the contracted Data Manager who is a HESA and Data Returns sector specialist. The Data Manager works with the Academic Registrar & Head of Compliance to ensure ongoing requirements are met, and provides or facilitates training to Registry Staff as necessary.

Quality assurance and operational arrangements

- 11.11 A spreadsheet of all annual returns due is maintained by the Data Manager and shared with key Senior Management Team and Registry staff. Additionally, all internal data collection and sign-off dates are published in key staff's Outlook calendars, allowing sufficient time for errors/anomalies/other issues to be identified and rectified prior to submission of data to HESA.
- 11.12 The Executive Action Group (Data) meets on an ad hoc basis as and when required to review and monitor operational and quality assurance arrangements.
- 11.13 Any queries regarding this area should be addressed to the Academic Registrar & Head of Compliance.

MEETING THE OFS 'B' CONDITIONS FOR QUALITY & STANDARDS

12. Academic regulations, frameworks and policies

12.1 Academic quality and compliance is jointly managed by the Academic Registrar & Head of Compliance and the Head of Studies, supported by Registry staff.

12.2 As a validated institution, Rambert School follows the academic regulations of the University of Kent, which is the awarding body of our degrees. These cover the following:

- 12.2.1 Admissions entry requirements for Overseas students;
- 12.2.2 Academic regulations that set out the necessary conventions for an award of higher education to be eligible;
- 12.2.3 The academic frameworks around which our curricula are designed and delivered (eg how much credit is assigned to each module which in turn affects the structure of delivery and assessment of each module, and the overall composition of each degree course);
- 12.2.4 Quality assurance mechanisms for ensuring academic quality and compliance.

12.3 The relevant academic regulations, policies and requirements of our validating university the University of Kent that we must follow are set out in the university's Regulatory Framework. Please see applicable conventions below:

- **Academic regulations:** see [UoK Academic Regulations for Taught Courses](#) and also [UoK Credit Framework for Taught Courses of Study](#) plus its annexes;
- **Academic appeals:** see [UoK Credit Framework Annex 13: Academic Appeals](#);
- **Academic misconduct:** see [UoK Credit Framework Annex 10: Academic Misconduct](#);
- **Academic complaints** – the University of Kent has a vested interest and responsibility with regard to academic complaints. The involvement of the University of Kent for academic complaints is set out in the [Rambert School Student Complaints Procedure](#);
- **Annual course monitoring:** see [Annex E: Annual Course Monitoring](#) and also [Annex P: Quality Assurance and Operational Management of Collaborative Partnerships](#)
- **Board of Examiners:** see [UoK Academic Regulations for Taught Courses](#);
- **External Examiners:** see [UoK External Examiners for Taught Courses of Study](#) and in particular, [Additional information for Examiners for Partner and Validated Courses](#) and the following Codes of Practice for Taught Courses: [Annex L: Quality Assurance Procedures for Courses of Study at Validated Institutions and Partner Colleges](#), [Annex O: Development of New Partnerships](#) and [Annex P: Quality Assurance and Operational Management of Collaborative Partnerships](#);
- **Intermission/interruption of studies:** Our [Intermission of Studies Policy](#) is aligned with the requirements of the University of Kent and sets out the procedures to be followed in the event a student may wish to intermit their studies;
- **Mitigating Circumstances:** [UoK Credit Framework Mitigation of Extenuating Circumstances](#);
- **Periodic Programme Review:** see [Annex F: Periodic Review](#) and also [Annex P: Quality Assurance and Operational Management of Collaborative Partnerships](#)

12.4 Any queries regarding academic regulations or any of the above issues should be raised with the Academic Registrar & Head of Compliance and the Head of Studies in the first instance.

13. Monitoring and Quality Assurance

- 13.1 Rambert School follows the annual course monitoring processes of the University of Kent. However, monitoring required by Kent is only applicable to the OfS 'B' conditions, and to rely solely on this process would not provide Rambert School with sufficient assurances and oversight of any areas that fall outside of the validating university's academic remit.
- 13.2 Any areas that are not monitored by the validating university are therefore covered in our own annual / continual monitoring processes. These comprise a combination of Annual Monitoring and Year Review (where certain aspects of the previous academic year are reviewed on an annual basis), and Continual Monitoring (which constitutes monitoring, review and oversight via the School's formal mechanisms such as its committees, and more informal mechanisms such as student and staff Focus Groups, day to day operational oversight, and joined-up staff engagement).
- 13.3 The mechanisms we have in place are designed to provide appropriate institutional oversight and assurance, proportionate to the context and operational elements of various areas of the School's educational delivery and the surrounding elements that support it.
- 13.4 A broad summary of items that are covered in Annual Monitoring and Year Review and those that are covered via Continual Monitoring, are set out in the table below for ease of reference. For any queries regarding this area, please contact the Academic Registrar & Head of Compliance.

| Items covered in Annual Monitoring and Year Review | Items covered via Continual Monitoring |
|---|---|
| 13.4.1 Summary of the previous admissions cycle | <ul style="list-style-type: none"> Compliance with PREVENT Duty (and, forthcoming, PROTECT and PREPARE Duty) |
| 13.4.2 Summary of the previous Widening Participation and Access cycle | <ul style="list-style-type: none"> Reportable Events |
| 13.4.3 NSS results and feedback, and Student Engagement | <ul style="list-style-type: none"> Collaborative Arrangements and Delivery |
| 13.4.4 Our compliance with the OfS 'B' Quality and Standards Conditions | <ul style="list-style-type: none"> Research activity and funding |
| 13.4.5 Our compliance with consumer law and the relevant OfS requirements (OfS 'C' conditions) | <ul style="list-style-type: none"> Student Experience |
| 13.4.6 Student cases | <ul style="list-style-type: none"> Student support |

MEETING THE OFFICE FOR STUDENTS' ADDITIONAL REQUIREMENTS

14. PREVENT Duty

Requirements for registered providers subject to the Prevent duty – effective from 1 January 2022

Serious Incidents and changes of circumstances

- 14.1 The Office for Students requires that all registered providers should report PREVENT-related serious incidents and Prevent-related change of circumstances as reportable events as required by ongoing condition F3 (provision of information to the OfS). These must be submitted online via the OfS portal as for all reportable events.

OfS Monitoring: Annual Prevent Return

- 14.2 Additionally, the School must submit an annual PREVENT return in December each year. This must be signed off by the Board of Trustees and is submitted on behalf of the School by the PREVENT SPOC.

School approach to managing PREVENT

- 14.3 The Academic Registrar & Head of Compliance is the PREVENT Single Point of Contact (SPOC) – also holding responsibility for submitting Reportable Events to the Office for Students – and holds responsibility for reporting PREVENT-related incidents and change of circumstances to the Office for Students in the event of occurrence.
- 14.4 Our institutional approach to implementing the PREVENT Duty is a Safeguarding one. This means that where there may be concerns about an individual being at risk of possible radicalisation or being drawn into extremism or terrorism, we will follow our Safeguarding procedures and protocols in the first instance. We may complement these with other risk management processes (eg Support Through Studies) to support decision-making and ensure relevant support is in place across our School community.
- 14.5 The small size of Rambert School means that school senior management has good general oversight of activities within the School. This, combined with the nature of the vocational educational training delivered by the School in the performing arts, and the integrated individualised pastoral and academic support of each student, means that the judgement of the School is that the general risk of radicalisation is both low and that we have effective mechanisms to support identification of issues/concerns, monitoring and swift intervention should it be needed.
- 14.6 We will implement the PREVENT Duty through the provision of effective campaigns of awareness, training and formalising of appropriate mechanisms, intended to further reduce the likelihood of occurrence and also reduce the likely impact on the individuals concerned and to the organisation of any incident which might occur.
- 14.7 The PREVENT Risk Assessment necessarily takes an institutional approach that is aligned with our PREVENT Strategy and Risk Register. The Risk Assessment cannot (and should not) attempt to rule out that any one individual may at some point be involved in extremist activity. It sets out the School's 'best endeavours' to mitigate the risk of extremism. By completing the actions set out in our PREVENT action plan, it is considered that the risk in each case can be reduced to a green status, in which the School is delivering its 'best endeavours' to mitigate that risk.

14.8 In December 2022, we were required to make an initial submission of our documentation and approach to implementing the PREVENT Duty. Accordingly, the School submitted the following to the OfS:

- **Completed OfS 'Annex A-C' institutional PREVENT self-assessment and details**
- **Summary paper to accompany Annex B**
- **Prevent Strategy**
- **Prevent Policy**
- **Prevent Risk Register**
- **Prevent Action Plan**
- **Code of Practice on Freedom of Speech**
- **Policy on Faith & Prayer Facility**
- **Safeguarding Policy**
- **FD/BA Student Handbook**
- **Postgraduate Student Handbook**
- **Student Induction Slides – Understanding PREVENT**
- **Paper to Student Staff Consultative Committee on Rambert School's institutional approach to implementing the PREVENT Duty & according appendices (11 a)**
- **Emergency Powers of Exclusion & Suspension**
- **Appendix C (Precautionary Measures) to the Policy on Sexual Misconduct, Harassment & Related Behaviours**
- **1 Minute Guide to Radicalisation & Preventing Extremism document**
- **PREVENT on a page document**
- **IT Policy – Acceptable Use**
- **IT Policy – Security**
- **Student Engagement Framework**

14.9 Below is a summary of the actions we have taken between September 2022 and December 2023 to ensure that we implement the PREVENT Duty in Rambert School and thus are meeting our statutory and legal obligations:

- **Production, Board approval and publication of the School PREVENT Strategy**
- **Production, Board approval and publication of the School PREVENT Policy**
- **Production and Board approval of our School PREVENT Risk Register and Action Plan**
- **Updating our Safeguarding Policy to ensure that it adequately incorporates PREVENT and links out to our PREVENT Policy**
- **Ensured more staff have undertaken the PREVENT Training**
- **Identification and appointment of the PREVENT Single Point of Contact or SPOC (the Academic Registrar & Head of Compliance) and the Deputy PREVENT SPOC (the Head of Admissions, Registry & Student Support)**
- **Review, revision, updating, Board approval and publication of the School Code of Practice on Freedom of Speech**
- **New Induction session for students on PREVENT**
- **Production and publication of Policy on Faith & Prayer Facility**
- **Production of information regarding PREVENT in Student Handbooks**
- **Consultation with students over our approach to implementing the PREVENT Duty**
- **PREVENT being instituted as a standing item on the following committee meeting agendas:**
 - **Student Staff Consultative Committee Agenda**

- Board of Trustees Agenda
 - Senior Management Team Agenda
 - Academic Quality & Standards Board Agenda
 - Production of 1 minute guide to Radicalisation and Preventing Extremism, put on public display in various areas of the School
 - Public display of the UK Government Guidance 'Prevent on a page' in various areas of the School
 - Engagement with the local Department for Education PREVENT Coordinator
 - Completed the PREVENT Preliminary Self-Assessment for the Office for Students with the full Senior Management Team, which led us to identify many of the above actions
 - Planned production of a new 'Visiting Staff' handbook and key information set which includes coverage of PREVENT
-

15. Freedom of Speech

- 15.1 Freedom of Speech is an area that at the time of producing this Handbook, is evolving rapidly. The [Rambert School Code of Practice on Freedom of Speech](#) was last reviewed, revised and updated in September 2022. It forms part of the suite of relevant documentation required to comply with the PREVENT Duty.
- 15.2 Rambert School is committed to protecting academic freedom and Freedom of Speech. The Policy includes a risk assessment for determining whether or not events/speakers can safely go ahead and to identify where any safety measures or mitigations may be needed.
- 15.3 Given that this area is a swiftly evolving one at the time of developing this handbook, this area will be kept under review and further measures, policies or mechanisms may be developed as necessary to support the School in managing this area in line with its obligations.
-

16. OfS Expectations for addressing and managing harassment and sexual misconduct (Condition E6⁵)

- 15.1 Since 2018-19 following the development of the CDD Policy on Sexual Misconduct, Harassment & Related Behaviours, Rambert School has taken a pro-active and robust approach to preventing, addressing and managing cases of harassment (of any kind), sexual misconduct, and other unacceptable behaviours (referred to by the School as 'related behaviours').
- 15.2 Having worked with the CDD policy and its procedures and ensured they were well-embedded in the School, Rambert School resolved to adopt the same policy and procedures as an independently registered institution. The Policy and its procedures were therefore revised and updated to reflect the School's position as a unitary institution.
- 15.3 A significant shift taken in our approach has been to carefully and clearly integrate this Policy with the Student Complaints Procedure, so that there is both flexibility and clarity about what process/policy can and should be used in what circumstances. Other relevant policies are also explicitly aligned with this Policy to provide sufficient institutional robustness and resilience.

⁵ At the time of producing this Handbook the OfS was undergoing consultation on a new condition of registration for regulating institutions with regard to harassment and sexual misconduct, the proposed condition E6. This handbook may require updating in the event of the introduction of a new condition.

- 15.4 Additionally, the Academic Registrar & Head of Compliance has specialist expertise not only in student casework, but also particularly in sexual misconduct and harassment cases, both from a policy and a case handling perspective. Knowledge and practice remains current through training and sector events, along with sharing practice and expertise in conservatoire networks.

17. Rambert School's approach to preventing and managing harassment and sexual misconduct

- 16.1 A summary of the School's approach to this area can be found below:

16.1.1 **A zero tolerance for sexual misconduct, harassment of any kind, or other**

unacceptable behaviours: this is clearly articulated in our Policy on Sexual Misconduct, Harassment & Related Behaviours, made clear in our Student Handbooks and the Guide to the Policy, and supported by our School Code of Behaviour & Student Code of Conduct;

16.1.2 **An innovative approach to resolving cases of harassment, sexual misconduct or**

related types of cases: our approach to resolving cases (usually arising from disclosures/complaints of behaviour that fall within the scope of the Policy on Sexual Misconduct, Harassment & Related Behaviours) is progressive and innovative, because:

- we move allegations away from focusing on the behaviour itself, to focusing on the effect of the reported behaviour on the relationship of trust and confidence between the individual(s) concerned and the School. A person who brings an allegation is referred to as a 'Complainant', and a person facing allegations of unacceptable behaviour is referred to as a 'Respondent' (as our approach is also informed by how they respond to an allegation);
- We seek to establish whether, on the balance of probabilities, it is more likely than not that unacceptable behaviour has occurred which has damaged or breached the relationship of trust and confidence that we need to have in order to deliver our education appropriately and safely for all concerned.
- We also seek to establish, as early as possible, what resolution a complainant is seeking. This helps to inform our approach of how we manage the matter and negates the risk of removing agency a further time from a Complainant.
- If we establish that there is evidence some such behaviour has occurred, depending on the status of the Respondent and informed by what a Complainant wants and how a Respondent is responding, as well as the severity of what has been reported and taking account of our zero tolerance policy, we have different avenues and options for managing allegations;
- Our approach is innovative because it removes the need for us to declare that behaviour which may also constitute a criminal offence has taken place. We do not need to establish, for example, whether a rape has taken place – which we do not have the legal jurisdiction to pronounce. We only need to establish that, on the balance of probabilities, it is more likely than not that some unacceptable behaviour of a sexual nature has taken place and if so, the question for us to resolve is, has this behaviour damaged or breached our relationship of trust and confidence with that individual, and if so, can it be repaired/restored?

16.1.3 Robust policies and procedures:

- We have a **zero tolerance** policy on behaviours that breach or damage our relationship of trust and confidence, the maintenance of which is essential to our whole School community being and feeling safe, able to thrive and to meet their full potential. This is articulated in the introductory paragraphs of our Policy on Sexual Misconduct, Harassment & Related Behaviours;
- Our **Policy on Sexual Misconduct, Harassment & Related Behaviours** directly addresses and provides a sensitive, flexible mechanism for anyone (whether student, staff member or outside individual) to raise issues or make a disclosure of an incident. It integrates support with process, and is enshrined in the principles of natural justice, fairness and lack of judgement;
- Our **Personal Relationships Policy** sets out clear expectations for when a personal relationship (whether romantic, familial or other) which may present a conflict of interest, should be declared to the School. It gives protections for students and staff to avoid potential or real abuses of power, and it provides a framework for the School to put in place mitigation measures where appropriate and necessary;
- Our **Student Complaints Procedure** clearly sets out how students can bring complaints that may fall within the scope of the Policy on Sexual Misconduct, Harassment & Related Behaviours, and what process(es) will be followed;
- **Training on understanding consent, on the Policy on Sexual Misconduct, Harassment & Related Behaviours, and on what support is available, is given to students** during Induction Week at the start of each academic year. Every student at the School receives this training;
- **School posters** on 'Calling out and Calling In' and on 'What to do if you have been called out' are on clear display in several places around the School;
- The **Inclusivity Policy & Protocols** include the following areas: Allyship & Bystander Intervention, Gender Identity, Tackling Racial Inequality, Religion & Belief, Sexuality & Sexual Orientation and Disability, all of which are aimed at supporting and maintaining a culture of inclusivity, kindness and understanding, and reducing the risk of harassment;
- Our **Non-Academic Misconduct Policy & Procedures** is aligned with our Policy on Sexual Misconduct, Harassment & Related Behaviours and it provides a disciplinary process that serious cases of potential breaches of our Policy on Sexual Misconduct, Harassment & Related Behaviours can be referred into;
- Our **School Code of Behaviour & Student Code of Conduct** is aligned with our Policy on Sexual Misconduct, Harassment & Related Behaviours, and both policies cover our entire School community of students and staff;
- **We always ensure that there is identified support for both a complainant and a respondent** regardless of their status (whether student, staff member or member of the public) in the event of any complaints, allegations or disclosures being made.
- We do not use **Non-Disclosure Agreements either contractually or as any form of settlement**, in line with the expectations of the higher education sector and also the Office for Students;

- **We do not prohibit, prevent or restrict any individual from disclosing information about an allegation of harassment or sexual misconduct which affects one or more students.** However, we have precautionary measures that allow us to impose conditions of confidentiality essential for the fair and proper investigation of allegations;
- Our **Terms and Conditions** have a 'contractual cooling period'. If a significant breach of our Policy on Sexual Misconduct, Harassment & Related Behaviours occurs during the 'contractual cooling period' which makes it evident that an individual is incompatible with our School ethos and approach, we have an expedited procedure for managing such cases;
- Our **Code of Practice on Freedom of Speech** has a risk assessment process that allows us to determine whether or not this code has been breached, which can support the School in determining whether harassment or other unacceptable behaviour may have occurred and whether a matter needs referring into any other process (eg Non-Academic Misconduct Policy & Procedures).

16.1.4 Specialist expertise and experience:

- The Academic Registrar & Head of Compliance is highly experienced in the area of higher education student casework, with particular expertise in cases of sexual misconduct, harassment and related behaviours;
- The Academic Registrar & Head of Compliance can and does train School staff in policies and procedures, works with the Head of Administration to ensure School policies are sufficiently joined up where necessary, and attends relevant conferences and sector events to share practice and ensure that knowledge remains up to date;
- Policies and procedures are joined up where necessary ensuring that this area can be flexibly navigated with the requisite robustness;
- The Academic Registrar & Head of Compliance is also sought out by other higher education institutions to provide support and advice in this area.

Relevant responsibilities of the Board of Trustees

- 16.2 It is both the expectation of the Office for Students and of the higher education sector more broadly that governing bodies hold a level of responsibility for tackling and preventing harassment and sexual misconduct in their institutions.
- 16.3 [Tackling Harassment and Sexual Misconduct Guidance](#) for governing bodies was produced in May 2022 and is periodically drawn to the attention of the Board. The aim of the guidance is to:
- highlight the role and obligations of governing bodies
 - offer support on leading strategies for addressing misconduct, harassment and hate incidents in higher education settings, and
 - be both a motivational and practical resource to instigate the changes needed to tackle this critical agenda.
- 16.4 Supporting information about the guidance can be found here: <https://www.universitychairs.ac.uk/2022/05/18/cuc-guidance-for-chairs-and-governing-bodies-tackling-harassment-and-sexual-misconduct/>

- 16.5 As set out in this guidance, the responsibilities of the Board of Trustees are to:
- 16.5.1 *Promote openness and transparency even in circumstances that do not portray Rambert School in a positive light;*
 - 16.5.2 *Explicitly accept that transparency includes potentially publishing reports that generate adverse publicity;*
 - 16.5.3 *Recognise that higher education institutions have an important role to place in challenging societal attitudes and shaping the minds of future generations;*
 - 16.5.4 *Lead by example by behaving in accordance with the values of the organisation, building leadership and governor diversity, ensuring good behaviour at the governing body as well as across all levels of the institution, and taking action where this is not the case;*
 - 16.5.5 *Consider identifying a Board champion against harassment and sexual violence. Engaging regularly with staff and students to ensure that the information received at Board triangulates with reports from staff working in this area and students.*
 - 16.5.6 *Be clear where in the Board and its Committee structure responsibility for this issue lies and ensure that there is sufficient space on the agenda to engage with the topic;*
 - 16.5.7 *Encourage Trustees to ask ‘the difficult questions’.*
- 16.6 Rambert School Board responsibility for oversight of and engagement in this area rests with the HR Committee, which holds a Safeguarding remit and monitors student cases annually. The Chair of the HR Committee is the Board’s Safeguarding Lead.
- 16.7 Any questions regarding the area of harassment, sexual misconduct/violence or other related behaviours, can be addressed to the Academic Registrar & Head of Compliance.
-

18. Collaborative arrangements and delivery (‘Working with Others’)

- 17.1 Quality assurance for collaborative arrangements and delivery is managed in accordance with our [Working with Others Policy & Handbook](#). This framework sets out our principles for Working with Others. It has been designed to be aligned with the QAA UK Quality Code alongside the Office for Students’ expectations, as well as ensuring that any requirements of the validating university are met.
- 17.2 Rambert School’s definitions of Working with Others activity are:
- Collaboration between Rambert School and other organisations or individuals who are not contracted staff of the School, to provide educational activities;
 - ‘Working with Others provider’ means any external individual, company or organisation with whom Rambert School enters into a ‘working with others’ activity.
- 17.3 It is important to note that any activity that contributes towards a student’s learning outcomes falls under the Working with Others framework.
- 17.4 Enrichment activities do not count towards meeting learning outcomes on any of our degrees, and therefore these do not fall under the Working with Others framework. Due diligence for these is managed in accordance with our institutional Duty of Care and relevant health and safety procedures.

- 17.5 Please see the [Working with Others Policy & Handbook](#) on our website for further information.
- 17.6 Any queries regarding this area, or regarding due diligence/health and safety procedures and protocols for external events and activities, should be addressed to the Academic Registrar & Head of Compliance.
-

19. Student engagement

- 18.1 Rambert School's mechanisms for student engagement are set out and managed in accordance with our [Student Engagement Framework](#). The Rambert School Student Engagement Framework has Four Areas:
- Area One: Engaging students with their training / learning
 - Area Two: Student engagement with quality assurance and enhancement in School
 - Area Three: training for student representatives
 - Area Four: Measuring student engagement against performance indicators
- 18.2 Our Student Engagement Framework is designed to cover all students, not just elected student representatives. Our approach to Student Engagement aims to capture the voice and input of our whole student community.
- 18.3 The Office for Students (OfS) defines Student Engagement as "[the strategic and impactful involvement of students or students' perspectives](#)". The Student Engagement Framework is aligned with relevant OfS Conditions of Registration and the [OfS Principles of Student Engagement](#), as well as the applicable parts of the UK Quality Code (as at August 2022).
- 18.4 Please see the [Student Engagement Framework](#) on our website for further information. Any queries can be addressed to the Academic Registrar & Head of Compliance and/or the Head of Studies.
-

20. Research

- 19.1 Rambert School is committed to academic excellence and scholarship, and to developing an institutional research profile. Further to this, in 2022 [Rambert School Research](#) was launched. Details of research activities and projects can be found at the above link.
- 19.2 Rambert School Research aims to develop a research programme which is relevant both to the School's interests and needs as a Conservatoire of Dance and to the profession as a whole. Building upon 100 years of the school's world-leading training and education in dance, Rambert School Research aims to have international reach and impact, engaging in meaningful dialogues about dance as an embodied practice across borders, and building global partnerships. More specifically, it aims to:
- 19.1.1 Broaden and magnify research activity in the School by supporting staff at all levels to embark on research projects that advance their own and the School's practices and activities, as well as contribute to the continuous enhancement of a research-led curriculum at both undergraduate and postgraduate levels;
 - 19.1.2 Foster an inclusive research culture;
 - 19.1.3 Mark research sustainable, impactful and shareable across the professional and educational sectors;

19.1.4 Take an active anti-discriminatory stance through its research activities;

19.1.5 Amplify the voices of underrepresented groups through targeted research activities.

19.3 For any queries relating to research, please contact the Head of Studies.

21. Freedom of Information / Subject Access Requests

General relevant information

- 20.1 The Freedom of Information Act requires every public authority to have a publication scheme, approved by the Information Commissioner's Office (ICO), and to publish information covered by the scheme. The scheme must set out Rambert School's commitment to make certain classes of information routinely available, such as policies and procedures, minutes of meetings, annual reports and financial information. This information is set out in Rambert School's Freedom of Information Policy, which is published on the School's website on the Governance page.
- 20.2 The information that Rambert School will release in accordance with the publication scheme represents the minimum that we must disclose. If a member of the public wants information not listed in our Freedom of Information policy, they can still request it (see 'Freedom of Information Requests' below).

Freedom of Information Requests

- 20.3 Freedom of Information Requests are handled by the School's professional services staff, overseen by the Data Protection Officer. The School has a dedicated email for receiving Freedom of Information Requests and Subject Access Requests (FOI@rambertschool.org.uk) made under the Freedom of Information Act (FOIA), and the relevant details are published on the School's website on the Governance page.
- 20.4 Rambert School operates Freedom of Information Requests within the legal requirements; key elements of these are set out below for ease of reference:
- Section 10 of the Freedom of Information Act sets out the timescales within which we are required to respond to an FOIA request. These timescales apply where we have:
 - A duty under Section 1(1)(a) to confirm or deny whether we hold the information;
 - A duty under Section 1(1)(b) to provide information we hold to the requester;
 - A duty under Section 17 to issue a refusal notice explaining why we have refused a request.
 - Section 10 specifies that we must comply promptly and **no later than 20 working days following the date of receipt of the request**. The ICO interprets this to mean that 'day 1' is the first working day after the request has been received.
 - There is a provision to claim a reasonable extension to this limit, up to an additional 20 working days, if we need more time to consider the public interest test⁶.

⁶ A public interest test requires a public authority to weigh up the public interest in maintaining the exemptions vs the public interest in disclosure.

Public Interest Test

- 20.5 There are exemptions in Part II of the FOIA to the requirement to release information; these are either ‘absolute’ or ‘qualified’. If an absolute exemption applies, we do not have to release the information. If an exemption is qualified, we must weight the public interest in maintaining the exemption against the public interest in disclosure. This is the Public Interest Test.
- 20.6 In determining whether a qualified exemption to the requirement to release information applies, the ICO states that we must consider the relative weight of the arguments for and against disclosure. This can be affected by:
- the likelihood and severity of any prejudice,
 - the age of the information,
 - how far the requested information will help public understanding, and
 - whether similar information is already in the public domain.
- 20.7 Where a qualified exemption applies and you do not wish to confirm nor deny that you hold the requested information, the decision to give a “neither confirm nor deny” response is itself subject to the public interest test.
- 20.8 The balance of public interest in all the circumstances of the request must be considered. ICO guidance will be consulted ahead of proceeding with any declining to provide information as a result of exemptions. Further [guidance and information](#) can be found on the ICO website.

Subject Access Requests

- 20.9 Individuals have a right to access personal data and other supplementary information that Rambert School holds. This is known as ‘Right of Access’. In order to access these records, they must make a Subject Access Request (SAR). The ICO provides the following summary guidance about SARs:
- Individuals can make SARs verbally or in writing, including via social media.
 - A third party can also make a SAR on behalf of another person.
 - In most circumstances, you cannot charge a fee to deal with a request.
 - You should respond without delay and within one month of receipt of the request.
 - You may extend the time limit by a further two months if the request is complex or if you receive a number of requests from the individual.
 - You should perform a reasonable search for the requested information.
 - You should provide the information in an accessible, concise and intelligible format.
 - The information should be disclosed securely.
 - You can only refuse to provide the information if an exemption or restriction applies, or if the request is manifestly unfounded or excessive.

Further ICO guidance on Subject Access Requests can be found [here](#).

Operational arrangements

Notification of FOI / SAR requests

- 20.10A Freedom of Information or Subject Access request may be made in writing (including via Social Media) or may be made verbally.

20.11 Rambert School's Data Protection Officer (DPO) monitors the FOI email inbox. In the event that a Freedom of Information or Subject Access request is received, the DPO will without delay notify the Chief Executive, Principal & Artistic Director and any other member of the School's Senior Management Team as necessary and relevant to alert them to the request.

20.12 The Chief Executive, Principal & Artistic Director, in consultation with the DPO and any other staff as necessary, will ascertain whether the request in question carries a need to notify and/or consult the Board of Trustees. The Board will therefore not automatically be notified on receipt of an FOI or SAR request, but on a case by case risk management basis, proportionate to the necessity of processing the request in line with requirements and any identified potential risk to Rambert School as a result.

20.13 Where the Chief Executive, Principal & Artistic Director identifies that there is a potential risk to Rambert School arising from an FOI or SAR request, the Chair of the Board of Trustees will be notified in the first instance to determine whether there is a need to notify the wider Board.

Requests received by email

20.14 Where a request is received by the School via email but has not been sent directly to the [School's](#) FOI inbox, the recipient member of staff should forward the email to FOI@rambertschool.org.uk, copying in the Data Protection Officer and the Chief Executive, Principal & Artistic Director (unless they are the recipient member of staff).

20.15 The DPO will then follow the steps set out in 'Action on receipt of a request', below.

Verbal requests

20.16 The recipient member of staff to whom the verbal request is made will immediately notify the Data Protection Officer who will follow the steps set out below ('Action on receipt of a request').

Action on receipt of a request

20.17 In the event that a Freedom of Information or Subject Access request is received, the DPO will without delay notify the Chief Executive, Principal & Artistic Director and any other member of the School's Senior Management Team as necessary and relevant to alert them to the request.

Responding to requests

20.18 The DPO will normally issue the institutional response to the request even where this may have been drafted by other members of Rambert School staff.

20.19 A summary of timescales for responding to requests is set out in the table below for ease of reference:

| Type of Request | Timescale for Responding |
|--------------------------------|--|
| Freedom of Information Request | <ul style="list-style-type: none"> You should respond promptly and no later than 20 working days following the date of receipt of the request (according to the ICO, 'day 1' is the first working day after the date the request is received). You can claim a reasonable extension of up to additional 20 working days if you need more time to consider the Public Interest Test |
| Subject Access Request | <ul style="list-style-type: none"> You should respond without delay and within one month of receipt of the request. |

| | |
|--|--|
| | <ul style="list-style-type: none"> the time limit may be extended by a further two months if the request is complex or if you receive a number of requests from the individual. |
|--|--|

Refusing a request

20.20 In the event that the DPO, supported by other staff as relevant, determines that an FOI or SAR request warrants a refusal to provide the information requested, the DPO will consult the [ICO guidance](#) on writing a refusal notice to ensure that the School acts in alignment with the relevant requirements.

22. Policy Management and Review Schedule

21.1 Rambert School policies fall broadly into 3 categories:

- Student-related Policies and Procedures
- Staff-related Policies and Procedures
- Policies and Procedures governing our whole School community

21.2 Student-related Policies and Procedures are overseen by the Academic Registrar & Head of Compliance, with input from relevant key staff.

21.3 Staff-related Policies and Procedures are overseen by the Head of Administration, with input from relevant key staff.

21.4 Policies and Procedures governing our whole School community may fall to different members of the School's Senior Management Team depending on context and staff remit, but are generally managed by the Academic Registrar & Head of Compliance in consultation with the Head of Administration and the Chief Executive, Principal & Artistic Director.

Policy Review Schedule

21.5 To ensure that our policies remain current and aligned with all relevant requirements, from 2023-24 a 'Policy Review Schedule' will be in place that is owned and monitored by the Risk and Audit Committee on behalf of the Board, covering all institutional policies. The cycle of review for most policies is usually either 1, 2 or 3 years according to context and legislative requirements, although some documents may have a longer review cycle where appropriate.
