

Apprenticeship Contingency Plan

1. Purpose

- 1.1. Our Apprentice Contingency Plan has been developed to reflect the principles detailed in our Student Protection Plan and the requirements of the Education and Skills Funding Agency (ESFA) Apprenticeship Funding Rules. This plan is designed to provide assurance that we have considered a wide range of risks that could impact apprentices' ability to successfully undertake or complete their programmes, and that we have contingency plans in place to eliminate, mitigate or manage these risks.

2. Aim

- 2.1. Walbrook's overarching aim is that apprentices should start our programmes in the expectation of completing their apprenticeship successfully.

3. Programme structure

- 3.1. Walbrook offers a range of approaches to delivery of apprenticeship training programmes in order to best address the unique needs of each employer and their apprentices. Some programmes have components that are delivered on Walbrook premises, online or at employer's locations or at alternate premises. For this reason, these continuity plans consider a wide range of arrangements that may be drawn on to address the needs of individual employers and their apprentices, should contingency arrangements need to be implemented.
- 3.2. In turn, Walbrook acknowledges that individual apprentices will be affected in different ways if any of the risks detailed in this plan materialise. For this reason, the Apprenticeships team will communicate directly with apprentices and their employers where additional support, advice or guidance is required and will work with any apprentices who have approved reasonable adjustments or identified additional needs to ensure actions and options meet their individual requirements.

4. Continuity of study

- 4.1. Walbrook will take all reasonable steps to minimise disruptions to apprentices' studies by:
 - a. re-scheduling any affected components of study in agreement with apprentices and employers
 - b. delivering a modified version of the same course or access to the same course via a different mode of study if required and an appropriate solution to the disruption (e.g. distance learning)
 - c. providing assistance to affected apprentices to move to a new training location for sessions that would have been onsite at Walbrook premises or relocating sessions to employers' premises when appropriate

- d. where training sessions were scheduled to be onsite at the employer's premises, arranging to move trainers to alternate locations provided by the employer

5. Travel

- 5.1. Apprentices are required to make their own arrangements to attend their place of work and study. Where a change of location of study is required for contingency reasons, Walbrook would seek to provide an alternate location that is as close as practicable to the original place of study. Where alternate arrangements have to be made that could not easily be accessed by the usual forms of transport, Walbrook will work with the employer to consider the nature and impact of alternate transport arrangements on individual apprentices and agree an appropriate solution.

6. Redundancy

- 6.1. Please refer to Section P289 to P293 of the ESFA Apprenticeship Funding rules 'Redundancy' for an outline of Walbrook's responsibility in the event that an apprentice is made redundant. Furthermore, there may be circumstances where, if an apprentice is made redundant, Walbrook must make reasonable efforts to find the apprentice a new employer. In addition to our Apprenticeships team, we have a specialist Walbrook Careers and Employability service that is at hand to assist apprentices with identifying career opportunities as well as preparing them to apply for positions. Our Careers and Employability service maintains a financial sectors jobs board that targets roles that are suitable for students and apprentices. As a professional body, Walbrook also has well established relationships with a large number of members working across the financial services sector plus a number of leading banks. Where appropriate, these relationships can be leveraged to identify opportunities for displaced apprentices. While assisting to secure alternate roles for apprentices who have been made redundant, our Careers and Employability service can provide assistance in updating CVs, interview techniques and personal branding so that apprentices are well positioned to secure alternate roles when they become available.

7. Risks to continuity of study

7.1. WALBROOK ceases to operate

- 7.1.1. Where viable, Walbrook will implement contingency plans which will allow existing apprentices to continue to complete their current programmes of study. The measures Walbrook has in place to manage this risk means the likelihood of an imminent closure of Walbrook is low. Walbrook manages this risk by having in place:
 - a. financial reserves that would allow us to continue to operate for at least the next three years
 - b. business plans that are reviewed (inter alia) by our Board of Directors/Chief Executive and Senior Leadership Committee
 - c. annual external auditing of finances that provides independent assurance of our business's performance and forecasts
 - d. engagement of legal and financial advisors

7.1.2 Where viable, Walbrook will maintain key academic and administrative staff to allow current apprentices to complete their programmes of study via the enrolled mode and timeframe. Where necessary, following consultation with employers and their apprentices, apprentices may be transferred to an Walbrook -run distance learning mode of study for the same programme, with Walbrook drawing on its existing experience and expertise in delivering our programmes via a distance learning mode of study.

7.2. Failure to secure or maintain Registered Training Provider status

7.2.1. In the event of termination of levy and/or non-levy agreement with the ESFA as a result of Walbrook being removed from the Register of Apprenticeship Training Providers (RoATP) and therefore becoming unable to continue the delivery of apprenticeship programmes, Walbrook will engage with the ESFA to make arrangements for effective exit to minimize the disruption to both apprentices and employers.

7.3. Closure / inaccessibility of the Peninsular House or Lovat Lane premises

7.3.1. Access to either of our London offices could be affected by matters in Walbrook's control, such as an issue with the premises itself, or matters external to Walbrook, such as a major incident, pandemic or changes in the external environment, implementation of Government regulations etc. Given the risks are both within and outside Walbrook's control, the risk is considered moderate. Walbrook manages this risk by having in place:

- a. Two teaching locations a short distance from each other: Peninsular House, 36 Monument Street, London, EC3R 8LJ and 25 Lovat Lane, London EC3R 8EB. Both sites are accessible and are set up for teaching.
- b. Signed lease agreements through to 2026 for Lovat Lane and 2028 for Peninsular House.
- c. A commercial combined insurance policy that provides financial and logistical assistance in helping us to find and secure suitable alternative premises if either Lovat Lane or Peninsular House were to become unusable.
- d. Owned premises in Canterbury at 4-9 Burgate Lane, Canterbury, Kent CT1 2XJ from where operations to provide remote classes, administrative services and/or coordination of contingency plans could be run.
- e. Where necessary, employers would be approached to provide training facilities onsite at their businesses locations if this were a suitable means of addressing the loss of an Walbrook teaching location.

7.3.2. For temporary interruptions of access to Peninsular House, face-to-face teaching sessions and workshops will be moved to the Lovat Lane location, and vice versa. If apprentices were unable to access both London locations on a temporary basis, where possible, classes will be moved to their employer's locations if possible or re-scheduled and/or delivered online.

7.3.3. Should Peninsular House or Lovat Lane become unavailable on a long-term basis, the alternate London premises will become the primary teaching location while arrangements were made with our insurers to secure a suitable new site.

7.3.4. If all face-to-face locations (Walbrook and employer) became inaccessible for an extended period for any reason, following consultation with employers

and apprentices, where possible, apprentices' face-to-face teaching sessions will be moved online.

7.4. Withdrawal of programmes or modules

7.4.1. Walbrook might make a strategic decision to withdraw a programme or module of study if it has been superseded by a new programme or module, if it cannot be resourced, the content is no longer fit for purpose or current, or if insufficient numbers can be achieved. The ongoing viability of programmes is monitored via the annual monitoring and quality assurance processes of Walbrook. As programme closure is a strategic, planned event with the process defined in operational policies, the risk is considered low. Walbrook manages this risk by having in place:

- a. Withdrawal of Programme and Module policy where every effort must be made to ensure that stakeholders are consulted, not disadvantaged in any way, have every opportunity to complete any programmes or modules they have been registered for or that suitable arrangements are made where the withdrawal of a programme or module is required;
- b. A process of consultation with those affected including employers and apprentices and with faculty on the potential impact of withdrawal of programmes and modules;
- c. A tested ability to successfully manage a programme teach-out process as demonstrated with the current teach-out of Walbrook's HE part-time programmes.

7.4.2. The withdrawal of programmes or modules is managed via Walbrook's Withdrawal of Programme and Module policy that ensures the impact of any proposal is assessed and managed and that key stakeholders are consulted as a core part of the process.

7.4.3. Where viable, a teach-out process will be proposed where current apprentices would be given the opportunity to complete their current programme of study. The timing of the implementation of any proposed withdrawal would also consider prospective apprentices and where in the recruitment cycle they were.

7.4.4. All proposals would be considered by Walbrook's Academic Board and could not be implemented without Academic Board oversight and approval of the teach-out and impact management proposal.

7.5. Unable to recruit or retain suitably qualified academic staff, including personal tutors, or key programme support staff

7.5.1. The impact of an inability to recruit suitably qualified staff is low given our programme specialties are not niche and that Walbrook has both an employed faculty and network of adjunct subject matter experts to draw on for temporary cover while permanent replacement staff are secured. Walbrook manages this risk by having in place:

- a. A strategic focus on raising and maintaining the profile of Walbrook including as a workplace of choice incorporating Investors in People accreditation;
- b. Regular systems of appraisal and professional development opportunities in line with Chapter 12 : staff development of the WALBROOK Code of Practice for Quality Assurance;

- c. Access to a network of subject matter experts from the HE sector, industry practitioners and faculty from our professional education and corporate training programmes.

7.5.2. Walbrook will fill gaps in staffing as quickly as possible. Where possible, we will draw on our suitably skilled and experienced faculty to cover vacancies or advertise the position and interview prospective applicants. In an emergency, were we need immediate cover, we will temporarily fill the post from our existing network.

7.6 IT infrastructure

7.6.1 Walbrook maintains its IT infrastructure and has in place processes and protocols for the ongoing monitoring and management of risks to our systems such as malicious attacks or hacking but remains as vulnerable to these and new threats as other organisations. Walbrook manages these risks to business-critical systems and the back-up and restoration of data by having in place:

- a. Full database and system replication across London and Canterbury sites including student virtual learning environments (VLE);
- b. Firewall protection and a skilled and up-to-date team of IT specialists who monitor system risks and maintenance;
- c. Regular Business Continuity testing to ensure business systems can be supported from one or other site;
- d. Out of hours protocols that have been tested and found to be resilient.

7.6.2. WALBROOK will implement its business continuity plans to reinstate IT services as soon as possible. Remote classes or workshops that were scheduled during a system outage will be re-scheduled and recordings and/or additional support material provided for apprentices who were unable to attend sessions due to an Walbrook IT system issue.

7.7 De-registration/loss of Taught Degree Awarding Powers (TDAP)

7.7.1 Walbrook is aware of the requirements to maintain ongoing registration with the Office for Students in order to retain TDAP. By working proactively to ensure requirements are well understood and met this risk is considered low. Walbrook manages this risk by:

- a. Having a Quality, Policy and Regulation Team that reports directly to the Chief Executive and retains ongoing oversight of regulatory requirements and academic quality, and ensures requirements are captured in policies and embedded in practice across the organisation;
- b. Having a well-defined governance structure which reports into the Board of Directors. The structure along with every committee's terms of reference are reviewed annually and formally approved by the appropriate committee;
- c. Having a well-defined academic framework, consisting of regulations, a Code of Practice for Quality Assurance, policies and supporting documents that is regularly reviewed and updated to align with regulatory requirements and sector best practice;
- d. Engaging fully with the various external regulatory documents to ensure our programmes are fit-for-purpose and align to the regulatory requirements;

- e. Having an active and transparent relationship with our regulators so that we can keep abreast of regulatory requirements and discuss queries in a timely manner, if and when they arise;
 - f. Being active members of sector groups, participating in a wide range of sector consultations and benchmarking against other institutions to ensure our understanding of requirements.
- 7.7.2. Where applicable, Walbrook will appeal any decision made to de-register or remove TDAP and/or would re-apply for the lost status or interim status to allow students and apprentices to be taught-out. We will work with the regulatory body to ensure that the impact to students and apprentices was minimised and, if possible, an interim teach-out plan could be agreed to allow those studying to complete their current programme of study. If an appeal or re-application was unsuccessful, we will seek a validation agreement with another awarding body to allow Walbrook to continue to teach-out registered students/apprentices.

8. Communication

8.1. Walbrook hold both the work and personal contact details of apprentices on our secure information systems and have student/apprentice calling tree contingencies. In addition, we hold contact details for the apprentices' employer organisations including the teams responsible for overseeing apprenticeship programmes and/or the line managers of apprentices who can enact their internal emergency contact procedures.

9. Contact details

Academic Dean
Dr. Rachel Banfield
rbanfield@walbrook.ac.uk

Apprentices should also keep the following key contact details with them:

- line manager's contact details
- employer's HR contact details

ESFA

Email: SDE.servicedesk@education.gov.uk
Telephone: 0370 2670001

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