

Annex D: Template for a student protection plan

Provider's name: ICMP MANAGEMENT LIMITED

Provider's UKPRN: 10035638

Legal address: 1B DYNE ROAD, LONDON. NW6 7XG

Contact point for enquiries about this student protection plan: qualityassurance@icmp.ac.uk

Student protection plan for the period 2018/19

An assessment of the range of risks to the continuation of study for your students, how those risks may differ based on your students' needs, characteristics and circumstances, and the likelihood that those risks will crystallise.

ICMP has a well-developed and embedded process for the regular monitoring and assessment of risk, with ultimate responsibility resting with the Corporate Board, our principal governing body. Through this process we regularly identify operational and strategic risks, assess them in terms of the likelihood that they will occur and the severity of the impact on our students and the institution should they occur, and ensure plans are in place to mitigate those risks that we consider could realistically materialise and over which we have control. ICMP also has a well-developed 'Business Continuity Plan' which is a procedure for the management of risks should they materialise. Additionally, ICMP has a 'Refund and Compensation' policy in place which is regularly reviewed and aligned with consumer protection law and good practice.

This is important should any risk materialise that cannot be rectified by preserving continuation of study. This student protection plan will be revised regularly, aligned with the quarterly review of overall risk for ICMP, to ensure that the risk assessment remains current and the mitigating measures remain practicable, relevant and effective. Where relevant, we have collaborated with students to ensure that their views, interests and needs are taken into account.

Following guidance, we have reviewed our risk register and in the following section we provide an assessment of a range of risks that would be of concern to the student and the regulator, together with our assessment of their likelihood to materialise; the impact they would have; the measures we take to mitigate these risks; and relevant evidence to support our conclusions.

1. ICMP is no longer able to or intends to operate

In this scenario, students would not be able to complete their chosen course of study with ICMP. We have assessed the likelihood of this risk materialising as **very low** for the following reasons:

- i. We have a well-developed and deeply embedded planning process, which considers all operational and strategic risks on a regular basis and ensures operational and strategic plans are regularly reviewed and implemented
- ii. ICMP is regulated by the OfS and the Department for Education (DfE) who regularly audit our financial sustainability, management and governance arrangements and student outcomes and our financial accounts are audited by an approved external financial auditor. Thus, our plans, our finances and our projections are externally audited and checked for soundness by our regulators.
- iii. ICMP appoints an external auditor to audit its financial statements annually, providing an independent voice with regard to ICMP's position as a going concern.
- iv. ICMP has delivered sound annual financial results over many years; has in place facilities for financing as required and an effective long-term relationship with Lloyds, its principal bankers; has a low level of leverage; continues to attract sufficient student numbers to fill its facilities; has not nor will embark on rapid growth; has been operational since 1986 without failure; has a strong

brand, market position and academic and business network in place; counts on well-established agreements with validating partners, that have been consistently reviewed positively over many years; and has delivered consistently improving metrics since entering into the formal regulatory sector.

- v. ICMP has been designated for student funding for many years and has never had a single cause for concern raised by any regulatory body
- vi. ICMP has held a Tier 4 licence for the recruitment of international students since the scheme's inception, without ever having it withdrawn, suspended or questioned
- vii. We have recently renewed our leases at 1b Dyne Road and we have security of tenure until 2033
- viii. ICMP has successfully undergone HER and annual monitoring by the QAA for many years
- ix. ICMP's principle shareholder, Paul Kirkham, is also Chief Executive and a Director of the Corporate Board and has no intention of discontinuing ICMP's operation.
- x. Based on this we consider it is highly unlikely that ICMP would lose its right to award the qualifications which it does; would fail financially; would have its licences to operate withdrawn; or any other similar scenario that would cause the institution to cease operations.

We have however put in place measures to protect the student interest in the unlikely event that ICMP is no longer able to or intends to operate, as follows:

- Arrangements for the transfer of students to identified providers, which include our principle awarding bodies (UEL and USW) and an additional specialist provider (LCCM, who would take our HNC students) who have all confirmed they would accommodate any students wishing or needing to transfer to another course/provider.
- We have a business continuity insurance policy in place that would provide sufficient funds to make alternative arrangements for students should any unforeseen event occur which meant we could not continue to deliver our courses
- We ensure our financial management is sound to ensure sufficient liquidity and we have put in place and published clear policies in order to be able to refund fees or provide compensation should that ever become necessary
- We provide support and advice regarding other options that may be open to students who wish to transfer
- We have developed and tested our business continuity plans in order that an established procedure is in place to manage this scenario should it ever occur.

2. ICMP can no longer award the qualifications for which students are registered

In this scenario, some students would not be able to complete their chosen course of study with ICMP. We have assessed the likelihood of this risk materialising as **very low** for the following reasons:

ICMP is currently validated by three external awarding bodies – the University of East London (UEL), the University of South Wales (USW) and Pearson. As such, ICMP has a contract with each of these bodies for the awarding of the ultimate qualifications. The only reason this scenario would occur would be if one of our awarding bodies withdrew its agreement with ICMP. We work hard to manage these relationships, which have been in place for many years, ensuring that we continually meet the contractual requirements as specified by each awarding body, including quality assurance, financial sustainability and management and academic capability to deliver each course.

Each contract is regularly reviewed and extended for appropriate time periods and we engage in regular communication and contact with key personnel from our awarding bodies to identify any areas of concern and address them well ahead of time.

As an example of how we approach such risks, we are in the process of transferring the validation of our BA Music Business from USW to UEL. Students will be consulted from an early stage of this process and asked whether they wish us to teach out their existing qualification (with USW) or transfer to a different awarding body (UEL) and their wishes will be respected. Of course, the qualification will be the same, just awarded by a different body.

However, we have put in place measures to protect the student interest in the unlikely event that ICMP can no longer award the qualifications for which students are registered, as follows:

- Arrangements for the transfer of students to identified providers, which include our principle awarding bodies (UEL and USW) and an additional specialist provider (LCCM, who would take our HNC students) who have all confirmed they would accommodate any students wishing to transfer to another course/provider.
- We ensure our financial management is sound to ensure sufficient liquidity and we have put in place and published clear policies in order to be able to refund fees or provide compensation should that ever become necessary
- We provide support and advice regarding other options that may be open to students who wish to transfer
- We have developed and tested our business continuity plans in order that an established procedure is in place to manage this scenario should it ever occur.

3. One or more of ICMP's study locations is no longer available

In this scenario, some students would not be able to complete their chosen course of study with ICMP. We have assessed the likelihood of this risk materialising as **very low** for the following reasons:

ICMP has one primary location of study (1b Dyne Road) and uses external facilities, such as Tileyard Studios, from time to time for certain course modules. We regularly review the upkeep of the facilities and have in place effective financial planning to ensure continuous investment is made in any required or desirable technology or equipment as required by each course. Our lease agreements at 1b Dyne Road are secure to at least 2033 and we maintain excellent relations with the local council and residents, complying with any planning restrictions and minimising any disruptions our presence may cause to the local community. And we have effective health, safety and security policies and oversight in place to ensure any risks are identified and plans put in place to properly address them.

We have however put in place measures to protect the student interest in the unlikely event that one or more of ICMP's study locations is no longer available, as follows:

- Arrangements for the transfer of students to identified providers, which include our principle awarding bodies (UEL and USW) and an additional specialist provider (LCCM, who would take our HNC students) who have all confirmed they would accommodate any students wishing to transfer to another course/provider.
- We ensure our financial management is sound to ensure sufficient liquidity and we have put in place and published clear policies in order to be able to refund fees or provide compensation should that ever become necessary
- We have an insurance policy in place that would provide sufficient funds to make alternative arrangements for students should any unforeseen event occur which meant we could not continue to deliver our courses from our current location
- We provide support and advice regarding other options that may be open to students who wish to transfer
- We have developed and tested our business continuity plans in order that an established procedure is in place to manage this scenario should it ever occur.

4. ICMP is unable to deliver courses in one or more subject areas or departments

In this scenario, some students would not be able to complete their chosen course of study with ICMP. We have assessed the likelihood of this risk materialising as **very low** for the following reasons:

This scenario would materialise only if we were to lose the right to award a specific qualification (covered above); were to lose a part of our operating facilities for some reason (covered above); or decide for some reason that we did not wish to continue with a given subject area. We have a well-developed long-term strategic plan which includes our portfolio plan, which enables us to see well ahead of time should we wish to discontinue any particular subject area. This enables us to ensure appropriate consultations and arrangements are put in place for students on those courses. And we currently have no plans to discontinue any of our current course portfolio. Further, we have a broad range of facilities and external industry relationships and a wide reach in terms of faculty engagement to ensure we have options to deliver all course modules should anything occur that changes our current arrangements.

We have however put in place measures to protect the student interest in the unlikely event that ICMP is unable to deliver courses in one or more subject areas or departments, as follows:

- Arrangements for the transfer of students to identified providers, which include our principle awarding bodies (UEL and USW) and an additional specialist provider (LCCM, who would take our HNC students) who have all confirmed they would accommodate any students wishing to transfer to another course/provider.
- We ensure our financial management is sound to ensure sufficient liquidity and we have put in place and published clear policies in order to be able to refund fees or provide compensation should that ever become necessary
- We have an insurance policy in place that would provide sufficient funds to make alternative arrangements for students should any unforeseen event occur which meant we could not continue to deliver our courses
- We provide support and advice regarding other options that may be open to students wishing to transfer
- We have developed and tested our business continuity plans in order that an established procedure is in place to manage this scenario should it ever occur.

5. ICMP is no longer able to deliver one or more courses, particularly if course closures are likely in next 3 years

In this scenario, some students would not be able to complete their chosen course of study with ICMP. We have assessed the likelihood of this risk materialising as **very low** for the following reasons:

This scenario would materialise only if only if we were to lose the right to award a specific qualification (covered above); were to lose a part of our operating facilities for some reason (covered above); or decide for some reason that we did not wish to continue with a given subject area. We have a well-developed long-term strategic plan which includes our portfolio plan, which enables us to see well ahead of time should we wish to discontinue any particular subject area. This enables us to ensure appropriate consultations and arrangements are put in place for students on those courses. And we currently have no plans to discontinue any of our current course portfolio. Further, we have a broad range of facilities and external industry relationships and a wide reach in terms of faculty engagement to ensure we have options to deliver all course modules should anything occur that changes our current arrangements. And there are no plans to close any courses for at least the next 3 years.

We have however put in place measures to protect the student interest in the unlikely event that ICMP is no longer able to deliver one or more courses, as follows:

- Arrangements for the transfer of students to identified providers, which include our principle awarding bodies (UEL and USW) and an additional specialist provider (LCCM, who would take our

HNC students) who have all confirmed they would accommodate any students wishing to transfer to another course/provider.

- We ensure our financial management is sound to ensure sufficient liquidity and we have put in place and published clear policies in order to be able to refund fees or provide compensation should that ever become necessary
- We have an insurance policy in place that would provide sufficient funds to make alternative arrangements for students should any unforeseen event occur which meant we could not continue to deliver our courses from our current location
- We provide support and advice regarding other options that may be open to students who wish to transfer
- We have developed and tested our business continuity plans in order that an established procedure is in place to manage this scenario should it ever occur.

6. ICMP is no longer able to deliver material components of one or more courses

In this scenario, some students would not be able to complete their chosen course of study with ICMP. We have assessed the likelihood of this risk materialising as **very low** for the following reasons:

This scenario would materialise only if we were highly dependent on any specific resource, and had no alternatives in place, for a particular course component. However, because of our long history of engagement with the music industry and the wide reach of our faculty engagement, including professional practitioners, no one course is vulnerable to individual staff or teachers; we design our modules to be taught by integrated teams of academic staff. And we have access to a wide range of facilities and partnerships to ensure our provision is also not dependent on any one part of our facility.

We have however put in place measures to protect the student interest in the unlikely event that ICMP is no longer able to deliver material components of one or more courses, as follows:

- Arrangements for the transfer of students to identified providers, which include our principle awarding bodies (UJEL and USW) and an additional specialist provider (LCCM, who would take our HNC students) who have all confirmed they would accommodate any students wishing to transfer to another course/provider.
- We ensure our financial management is sound to ensure sufficient liquidity and we have put in place and published clear policies in order to be able to refund fees or provide compensation should that ever become necessary
- We have an insurance policy in place that would provide sufficient funds to make alternative arrangements for students should any unforeseen event occur which meant we could not continue to deliver our courses from our current location
- We provide support and advice regarding other options that may be open to any student wishing to transfer
- We have developed and tested our business continuity plans in order that an established procedure is in place to manage this scenario should it ever occur.

7. ICMP is no longer able to deliver one or more modes of study to students, particularly if withdrawal of a mode of study is likely

In this scenario, some students would not be able to complete their chosen course of study with ICMP. We have assessed the likelihood of this risk materialising as **very low** for the following reasons:

This scenario would materialise only if ICMP were to decide to withdraw a particular mode of study, which is not in any of our current or long-term plan, or a particular mode of study were so dependent on a particular facility or tutor that could not be replaced, which has also been covered previously.

We have however put in place measures to protect the student interest in the unlikely event that ICMP is no longer able to deliver one or more modes of study to students, as follows:

- Arrangements for the transfer of students to identified providers, which include our principle awarding bodies (UEL and USW) and an additional specialist provider (LCCM, who would take our HNC students) who have all confirmed they would accommodate any students wishing to transfer to another course/provider.
- We ensure our financial management is sound to ensure sufficient liquidity and we have put in place and published clear policies in order to be able to refund fees or provide compensation should that ever become necessary
- We have an insurance policy in place that would provide sufficient funds to make alternative arrangements for students should any unforeseen event occur which meant we could not continue to deliver our courses from our current location
- We provide support and advice regarding other options that may be open to students who wish to transfer
- We have developed and tested our business continuity plans in order that an established procedure is in place to manage this scenario should it ever occur.

8. ICMP is no longer able to recruit or teach a particular type of student

In this scenario, some students would not be able to enrol on or complete their chosen course of study with ICMP. We have assessed the likelihood of this risk materialising as **very low** for the following reasons:

ICMP's admissions policy has been developed over many years to ensure all applicants have opportunity to enrol on their chosen course of study should they meet the requirements to do so. We make every effort to make reasonable adjustments to accommodate student need but cannot always do so. For example, where an applicant declares a disability or identified learning support need, this is referred to the Disability & Wellbeing Team, who work with the applicant and the Education Team to determine the appropriate level of support to be provided by the ICMP and the course, and that this is achievable with reasonable adjustments. Where appropriate support cannot be provided even with reasonable adjustments, this will be discussed with the applicant and, where relevant, alternative courses explored.

We also have a clear obligation through our Tier 4 licence with the UKVI to properly enrol and monitor attendance of international students and should we for any reason lose our Tier 4 licence then we would not be able to recruit or retain any student who is studying under this type of visa.

In the event that we are unable to recruit or teach a particular type of student, we have put in place measures to protect the student interest, as follows:

- We ensure our financial management is sound to ensure sufficient liquidity and we have put in place and published clear policies in order to be able to refund fees or provide compensation should that ever become necessary
- We provide clear explanation to any student impacted regarding our reasons for not being able to recruit or teach them this will be discussed with the applicant
- We provide support and advice regarding other options including alternative courses that may be open to them

9. ICMP loses its right to recruit and retain international students through its 'Tier 4' Licence

In this scenario, some students would not be able to enrol on or complete their chosen course of study with ICMP. We have assessed the likelihood of this risk materialising as **very low** for the following reasons:

As stated above, ICMP maintains a licence with the UK Visas and Immigration service (UKVI) for the recruitment and retention of international (Tier 4) students. In order to retain this licence, which is reviewed annually, ICMP ensures continual compliance with the terms of the Tier 4 licence through

an internal committee and management structures. We regularly report to UKVI relevant metrics associated with this licence, and we provide training and regular communication to key staff and students of the requirements of the Tier 4 licence and their obligations. We have held a Tier 4 licence since the scheme's inception; we have never had any suspension or withdrawal of this licence; nor have we ever had any causes for concern raised in terms of the metrics we achieve against set targets.

In the event that we lose the right to recruit and retain international students through our 'Tier 4' Licence, we have put in place measures to protect the student interest, as follows:

- We ensure our financial management is sound to ensure sufficient liquidity and we have put in place and published clear policies in order to be able to refund fees or provide compensation should that ever become necessary
- We provide clear explanation to any student impacted regarding our reasons for not being able to recruit or teach them
- We provide support and advice regarding other options that may be open to them

10. ICMP loses its right for students to access student loan funding for any reason

As a result of being 'designated' for student loan funding, eligible ICMP students are able to access student loans and associated support funding. In this scenario, some students would not be able to enrol on or complete their chosen course of study with ICMP as a result of this funding not being available. We have assessed the likelihood of this risk materialising as **very low** for the following reasons:

ICMP is regularly assessed by relevant regulatory bodies (primarily the OfS and the DfE) as being compliant with the terms of this designation for student support funding. In order to ensure we continue to meet the conditions of designation, we take a number of measures including formally registering with the OfS and ensuring ongoing compliance with their various expectations in terms of student retention, achievement and success, student satisfaction, financial sustainability, management and governance capability etc; we ensure extensive engagement with the student body to ensure any complaints are properly addressed and student satisfaction is optimised; we subscribe to the Office of the Independent Adjudicator (OIA) to ensure students have access to the sector ombudsman should that be required; and we maintain effective data management systems to ensure data and information is provided as required by the OfS for regular monitoring. Since monitoring was introduced, we have submitted information on an annual basis and never had any concerns raised regarding any of our metrics including financials. Our requests for SNC's have always been accommodated.

In the event however that we lose the right for students to access student loan funding for any reason, we have put in place measures to protect the student interest, as follows:

- Arrangements for the transfer of students to identified providers, which include our principle awarding bodies (UEL and USW) and an additional specialist provider (LCCM, who would take our HNC students) who have all confirmed they would accommodate any students wishing to transfer to another course/provider.
- We ensure our financial management is sound to ensure sufficient liquidity and we have put in place and published clear policies in order to be able to refund fees or provide compensation should that ever become necessary
- We have developed and tested our business continuity plans in order that an established procedure is in place to manage this scenario should it ever occur.
- We provide support and advice regarding other options that may be open to students who wish to transfer

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

Of the above risks, we do not expect any to reasonably crystallise as a result of the assessment articulated. Against each section we have however indicated measures we have in place with regard to each risk should they crystallise but to emphasis we do not expect that to happen.

3. Information about the policy you have in place to refund tuition fees and other relevant costs to your students and to provide compensation where necessary in the event that you are no longer able to preserve continuation of study

We have a 'Refunds and Compensation Policy' that covers all of these matters. To be clear, this policy covers what happens in the following scenarios:

- refunds for students in receipt of tuitions fee loan from the Student Loans Company.
- refunds for students who pay their own tuition fees.
- refunds for students whose tuition fees are paid by a sponsor.
- the payment of additional travel costs for students affected by a change in the location of their course.
- commitments to honour student bursaries.
- compensation for maintenance costs and lost time where it is not possible to preserve continuation of study.
- compensation for tuition and maintenance costs where students have to transfer courses or provider.

We can comfortably cover any financial implications of this refund and compensation policy for the following reasons:

1. In our accounts, we provided/are providing £170,000 in 2017/18; £255,000 for 2018/19; and £290,000 for 2019/20 for expected student attrition, i.e. withdrawals/refunds. These amounts are equivalent to approximately 4% of projected revenues and accounts for fees we will either have to refund or will not receive from the SLC should a student withdraw.
2. These amounts are therefore built into budgeting and projected cashflow, and are easily sufficient. For reference, in the past 2 years, actual refunds paid out and attrition recorded was as follows:

Academic Year	2017/18	2016/17
Refunds paid out	(£17,480)	(£22,900)
Revenue Impact (attrition)	(£110,348)	(£126,938)
Total	(£127,828)	(£149,838)

3. We have in place a Business Continuity insurance policy that covers material damage, including damage caused by fire, flood, theft etc to buildings, tenants improvements, and facilities and equipment, to the amount of £4,528,700. We also have a Business Interruption policy in place, covering such things as denial of access, loss of attraction, additional cost of working etc. to the amount of £8,230,000. These policies are reviewed annually in line with projected business size and in addition to material damage and business interruption also cover Money and Personal Accident (Assault) Contract Works; Machinery Breakdown; "All Risks" Specified Items; Computer Breakdown; E-Risks; Goods in Transit; Deterioration of Stock; Loss of Licence; Legal Expenses; Employers' Liability; Public Liability; Products Liability; Product Withdrawal Expenses; Environmental Impairment Liability; Financial Loss Extension; Employee Protection and Fidelity Cover Ransom Demands; Claims Preparation Costs; Company Function and Conference Cover Lottery Cover
4. Our submitted financial accounts and projections show a healthy year-end liquidity position for a small institution of 59 days in May 2018; 53 days in May 2019; and 60 days in May 2020. These equate to actual cash reserves of £837k in May 2018; £877k in May 2019 and £1,055k in May

2020. The accounts also show an increasingly positive and significant net assets and current ratio position, thus demonstrating there is sufficient liquidity in the business to cover any additional refunds or compensation in the unlikely event this should be required.

5. We have assessed in this document all major risks to continuity of our provision as being low. Thus, with our current and projected liquidity position; our practice of providing for attrition and refunds in the accounts which addresses those students who are likely to withdraw; our historical track record on refunds; and our business continuity and business interruption insurance policies; we are confident that we are well covered.

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

The plan will be published in a clear and accessible way via our website; our internal 'virtual learning environment' (VLE); will be referred to in such materials as our course prospectus; will be communicated directly with students during such events as induction; and we will provide a link to the plan through the enrolment process for all students before they commit to taking an ICMP course.

We will ensure that staff are aware of the implications of our student protection plan when they propose course changes by including the plan into internal induction and training activities and making all committee Chairs aware of the need to cross check against the plan when discussing/approving any relevant changes.

Given the short time frame from the issuing of guidance to the submission of registration documents to the OfS we have had very little opportunity to engage with students in the initial plan construction. However, going forward we will formally consult with our student representatives with regard to reviewing this plan on an annual basis, ensuring any relevant comments or feedback on the plan are properly considered and where relevant included.

We will inform our students if there are to be material changes to their course through our extensive processes for student engagement including Programme Committees, Student Representatives, and Student President as well as more traditional means of communication e.g.. email, VLE etc wherever possible any material changes would be discussed and agreed with the student body. We would enact these processes as soon as a need for material change became apparent. In the case of course transfer or course closure without teach out students would be able to access independent advice through our validating partners.