Procedure 2.5
Student Protection Plan

Table of Contents

Introduction and Guiding Principles *2*

1. Risk Assessment - Potential Risk Events and Mitigation Strategies *3*

1.1 Risk prevention/minimisation through good governance 3

1.2 Risk management (assessment and mitigation) 3

Introduction 3

Significant material changes 4

3. Communications and Student Participation *14*

3.1 Communicating the plan and engaging students 14

LFA © Copyright

Introduction and Guiding Principles

London Film Academy (LFA) is committed to delivering high quality education, in a safe and inclusive environment and ensuring that all of its students achieve the best academic outcomes.

LFA's guiding principles in the development of this plan are to:

- make every effort to ensure that the courses offered to students are delivered as described
- accept that it may be necessary to make changes to its provision to maintain currency and validity
- always seek to minimise disruption to students and give special consideration to its widening participation population and those with protected characteristics
- endeavour at all times to keep students appropriately informed with regard to changes that may be necessary and will bring these to their attention as soon as possible.

Student Protection Plans (SPPs) are intended to provide assurance to current and future students that higher education providers have in place appropriate arrangements to protect the quality and continuation of study for their students. The production and publication of a SPP is a requirement of registration with the Office for Students (OfS).

This Student Protection Plan looks at the strategies in place to mitigate the risks to students following higher education courses LFA. It also considers the wider context of institutional change/closure for LFA as a whole. The plan lays out measures LFA will take in order to protect the students' interests and ensure their continuity of study. Note: These are in addition to statutory rights, which remain unaffected.

The risks identified which impact specifically on LFA students are listed below in Section One. An assessment of these risks has been made and a risk factor applied depending on the likelihood of an event taking place.

Depending on the risk level, mitigation strategies have then been outlined in order to demonstrate how continuation of study will be ensured.

Section Two details policy with regards to refunds and compensation in the event that LFA is unable to preserve continuation of study and Section Three considers communications, student engagement and student support.

This Plan is owned by the LFA Governance Board and managed by LFA's Senior Management Committee.

LFA © Copyright

1. Risk Assessment - Potential Risk Events and Mitigation Strategies

This section looks at the measures in place to:

1. Mitigate risks from occurring in the first place
2. Identify and manage risks should they occur.

In unlikely event of closure we will seek managed agreement with likeminded organisations to deliver similar training

1.1 Risk prevention/minimisation through good governance

Good governance is the key to mitigating risk generally. LFA has:

- an effective Corporate Governance Framework that ensures regulatory compliance
- a policy driven committee structure ensuring good Academic Governance
- strategy that enables competitiveness through the application of key performance measures
- financial planning and forecasting with institutional growth which spreads risk of under-performance in one particular department
- effective management at Programme level with Policy and Procedures to ensure programmes are delivered as described.

LFA is in process of further developing its risk management processes including: Risk register; Business Continuity Plan and Risk Sub-Committee.

1.2 Risk management (assessment and mitigation)

Introduction
LFA is committed to helping its students achieve the best academic outcomes from their studies. However, events may occur, which mean that unforeseen changes have to be made to modules or programmes. Provision for such minor events is detailed in LFA's *Terms and Conditions*.

LFA will always communicate any changes to students as early as possible, with clear information and options. In cases where there is an event that results in a material change, e.g. programme changes, suspensions, closures or institutional closure, LFA will make every effort to minimise disruption by offering affected students, for example, the chance to transfer on to another course or switch to a different provider. These events may be triggered by situations such as (but not limited to):

- significant material changes
- inability to operate as intended
- loss or restriction of licenses
- revocation of OfS registration
- restriction or withdrawal of franchising/validating agreement(s) by awarding bodies
- closure or relocation of one or more campuses
- a decision not to continue running an existing course
- major changes in the contents of a course
- temporary disruption(s) of any kind due to uncontrollable events
- inability to deliver specific timings of study such as day-time or evening
- the unanticipated departure of key members of college staff
- inability to recruit staff with the necessary skills to deliver a course.

Where students are required to change course or provider, there may be implications for their student finance arrangements (e.g. SLC loans). In such cases LFA will provide the necessary information, advice and guidance to allow an effective transition.

LFA © Copyright

Significant material changes
Based on OfS guidance the following 'risk events' are considered under this SPP with details provided on the measures we will take in specific situations:

1. **Academy closure**

Risk Event	Risk Rating	Risk Assessment
(Scenario explanation)	(Likelihood of risk event taking place and impact)	(Assessment and evidence for this risk rating)
A decision to close the institution has been taken for strategic reasons. We are unable or no longer intend to operate due to financial performance.	Low	LFA strategy has been to grow portfolio provision in the HE, Short Courses and Corporate Sectors to spread risk. The risk of being unable to operate due to financial instability or unsustainability is low because our balance sheet and cash reserves are relatively healthy. Student numbers are growing.
Mitigation Strategies (measures put in place to mitigate impact of risk events)		
• Good governance and regulatory compliance • Development of a Risk Register and Business Continuity Plan • Quality provision • Course development • Effective marketing and recruitment campaigns • Financial planning and forecasting In the unlikely event LFA had to close we would make immediate announcements and convene consultation meetings with students. LFA would first always seek to 'teach-out' programmes but failing this would ensure the continuation of studies for all students through transfers to alternate providers. If possible and/or where appropriate financial arrangements would be made according to LFA Procedure 2.4 - Tuition Fee Refund and Compensation.		

2. **Loss of student loan facility**

Risk Event	Risk Rating	Risk Assessment
(Scenario explanation)	(Likelihood of risk event taking place and impact)	(Assessment and evidence for this risk rating)
De-designation of entire provision or specific courses for student support purposes (i.e. students no longer able to access Student Loan Company (SLC) loans). Could occur if removed from OfS register or other major issue.	Low	Under the OfS, only LFA's BA & MA Courses have become eligible for loans directly and the loss risk is still considered low. Currently SLC facility only covers part of the course fee for BA/MA Course. Currently 31% of BA students and 25% of MA students access SLC funding. Brexit means even fewer students are able to access government loans.

LFA © Copyright

Mitigation Strategies (measures put in place to mitigate impact of risk events)
Good governance and regulatory compliance. In the unlikely event LFA students were no longer able to access student loans we would liaise closely with the Student Loans Company and OfS to allow enrolled students to complete their course/year. Failing this we would support students to transfer to alternative programmes or alternate higher education providers (including our current collaborative partners). Where appropriate, financial arrangements would be made according to *LFA Procedure 2.4 - Tuition Fee Refund and Compensation.*

3. Withdrawal or non-renewal of franchise/validation agreement

Risk Event	Risk Rating	Risk Assessment
(Scenario explanation)	(Likelihood of risk event taking place and impact)	(Assessment and evidence for this risk rating)
Loss or non-renewal of validation/franchise agreement (collaborative provision)	Low	LFA admin and academic teams are fully trained in the regulation requirements of collaborative partners and therefore meet with expectations. The validating partner have their own robust systems in place to ensure compliance. LFA passed official partner approval with no conditions and has had three courses validated. LFA has been complimented by the validating partner on the excellent quality of delivery, assessment and processes. Student numbers are good and programmes financially viable. Partners have long term strategy and positive attitude toward developing partnerships. Risk level is therefore considered low.
Mitigation Strategies (measures put in place to mitigate impact of risk events)		
Good governance and regulatory compliance Quality provision and the maintenance of academic standards In the unlikely event LFA were to lose a collaborative partner we would make immediate announcements and convene consultation meetings with students. LFA would first always seek to 'teach-out' programmes but failing this would ensure the continuation of studies for all students through transfers to the collaborative partner institution or other alternate providers. If possible and/or where appropriate financial arrangements would be made according to the *LFA Procedure 2.4 - Tuition Fee Refund and Compensation.*		

LFA © Copyright

4. Suspension/closure of a course

Risk Event	Risk Rating	Risk Assessment
(Scenario explanation)	(Likelihood of risk event taking place and impact)	(Assessment and evidence for this risk rating)
A decision has been taken not to run a course for the subsequent year. A course fails to recruit suitable numbers.	Low/Medium	LFA operates a Programme Approval Procedure that ensures that any newly proposed courses are thoroughly researched to confirm market demand, financial viability, resource requirements, etc. That said, competition in the market could have adverse effects. The risk of competition in the market causing failure and withdrawal is therefore considered low to medium.
Mitigation Strategies (measures put in place to mitigate impact of risk events)		
Comprehensive market research Application of detailed Policy and Procedure documents Monitoring of recruitment activity Annual review of courses Periodic review of courses Measuring student satisfaction and achievement rates In the unlikely event LFA had to close or suspend a course we would make immediate announcements to current students and cease any future recruitment. We would consider a number of mitigation options, depending on the circumstances and student needs. These would include: Teach-out arrangements, Course Transfer (where suitable alternatives exist) and College Transfer. Prospective students are informed at the time of application that courses are run subject to demand. Should an intake for a course need to be cancelled students are given reasonable notice. Students who have been accepted are offered an alternative start date and/or advice and guidance on alternative providers able to meet their needs sooner.		

5. In-year major course content changes

Risk Event	Risk Rating	Risk Assessment
(Scenario explanation)	(Likelihood of risk event taking place and impact)	(Assessment and evidence for this risk rating)
Module closure or other major changes to programme content due to regulatory framework changes or government legislative changes	Low	Current course provision is designed by LFA so curriculum changes at the behest of LFA in conjunction with its validating partner. Major changes are considered to include: • External (e.g. governmental edict, change of legislation, regulatory change) • Resource-oriented (e.g. premises, staffing) • Qualitative (e.g. catastrophic failure of assessment regime, major queries from validating partner)

LFA © Copyright

Mitigation Strategies (measures put in place to mitigate impact of risk events)
Annual monitoring of programmes Module evaluations Monitoring of qualification framework changes CMA compliance In the event of major in-year content changes LFA would first consult with student representatives. All changes will be agreed with the students or they will be given the opportunity to transfer to other programmes / modules where possible or required. Refunds and financial compensation would be considered as appropriate.

6. Suspension or revocation of UKVI – Student Sponsor licence

LFA is licensed to sponsor migrants under the Student route of the points-based system to obtain a visa to study in the UK.

Risk Event	Risk Rating	Risk Assessment
(Scenario explanation)	(Likelihood of risk event taking place and impact)	(Assessment and evidence for this risk rating)
Removal or suspension of Student Sponsor licence (the Home Office issued licence which allows a provider to recruit international students).	Low-Medium	LFA has a range of provision and whilst the number of students requiring a visa recruited is significant it does not consist more than third of the student cohort. Now that the UK has left the EU there will be considerably more students requiring sponsorship. We anticipate to be two thirds of the student population on courses over six months. In 2018, LFA had a spot inspection by UKVI and can confirm that LFA contracts, policies and produces are compliant. Academy-wide the risk rating is also considered to be very low as LFA has held a licence for many years. The risk is considered low-medium due to the increased reliance on students that require sponsorship.

Mitigation Strategies (measures put in place to mitigate impact of risk events)
Admissions Team applying strict policy ensuring compliance to UKVI regulations Strict attendance policy and monitoring Robust admissions processes UKCISA Membership In the unlikely event of a licence suspension LFA would look to work closely with the UKVI to allow enrolled students to complete their year of study / programme. Where students are yet to start their course, they are given the opportunity to postpone their application pending the resolution of the suspension. In the case of a revocation, LFA would take all reasonable steps to minimise the disruption, for example, by assisting affected students to switch to an alternative provider.

7. Drop in country-specific student demand

LFA © Copyright

Risk Event	Risk Rating	Risk Assessment
(Scenario explanation)	(Likelihood of risk event taking place and impact)	(Assessment and evidence for this risk rating)
Reduction in enrolments from a specific country or region. In the current climate the main concern here is considered to be the countries from the European Union (i.e. the impact of Brexit).	Medium	LFA currently enjoys a diverse and changing country representation and therefore cohorts are not dependent on enrolments from a specific country. Since UK's exit from the EU, the previous SLC funding arrangements for such students are no longer be available. We have seen a drop in demand from EU students and the risk is the potential impact on our ability to recruit. We have therefore ranked this risk as medium.
Mitigation Strategies (measures put in place to mitigate impact of risk events)		
Diversification of marketing channels SMC monitor student applications for country-of-origin trends and be agile its response LFA is mitigating any risk of a fall in demand by building a strategy to target more UK students and non-EU students. It is still early days in UK's exit from EU so the SMC will monitor trends to see if the resulting drop in demand continues and has impact on overall student numbers. Central to this strategy has been LFA to recruit through UCAS in order to raise the profile of the provision to UK students who are more likely to apply via that channel. We have also introduced financially assisted places in line with our widening access and participation statement which will bring the fees more in line with SLC funding. LFA has a Student Sponsor licence so can continue to recruit EU and non-EU students.		

8. Fail to meet Office for Students (OfS) requirements regarding quality and standards

Risk Event	Risk Rating	Risk Assessment
(Scenario explanation)	(Likelihood of risk event taking place and impact)	(Assessment and evidence for this risk rating)
LFA fails to meet the quality standards set out in B conditions of the *OfS Regulatory Framework*	Low	LFA takes its regulatory obligations very seriously and has in place mechanisms to ensure quality standards are upheld, including internal academic structures, an external validating partner and a Governance Board who have oversight of our provision. The LFA Governance Board has specifically within its remit the responsibility to ensure that the LFA operates in accordance with the stated requirements and expectations of external regulatory and scrutiny bodies.
Mitigation Strategies (measures put in place to mitigate impact of risk events)		

LFA © Copyright

LFA Academic Board
Good governance and regulatory compliance
Financial sustainability
Effective policies and procedures
Annual monitoring and review

In the unlikely event there was a loss in 'confidence' by OfS, LFA would work with the OfS or regulating body to improve quality standards and minimise the resultant disruption to affected students and applicants and comply with their requirements.

9. **Loss of accreditation from an awarding body (University of Derby/Course approval)**

Risk Event	Risk Rating	Risk Assessment
(Scenario explanation)	(Likelihood of risk event taking place and impact)	(Assessment and evidence for this risk rating)
Loss of accreditation from an awarding body Changes to regulatory framework affecting a specific course	Low	LFA has been validated by University of Derby (UoD) since 2018 and has received positive feedback from the UoD Partnerships Team and External Examiner. LFA chose to work with UoD (TEF Gold) because of its robust procedures and closely aligned values. LFA was award partner approval by UoD with no conditions (rare) and now has three courses validated. We have been consistently complimented by UoD on the quality of the course and course administration.
Mitigation Strategies (measures put in place to mitigate impact of risk events)		
Good academic governance In the event that a new regulation or loss of institution approval makes a course impossible to deliver, LFA will teach out the enrolled students and review the viability for delivery in the next year. If required we would enter into discussions with University of Derby to find a suitable resolution.		

LFA © Copyright

10. Loss of OfS registration

Risk Event	Risk Rating	Risk Assessment
(Scenario explanation)	(Likelihood of risk event taking place and impact)	(Assessment and evidence for this risk rating)
The OfS does not approve LFA's admission to the Register or removes it (giving rise to students being unable to access student loans and loss of UKVI licence)	Low	LFA joined OfS register in October 2019. LFA is now experienced in its data collection responsibilities and regulatory compliance that come with OfS membership and has in place the governance framework and operational committee structure to ensure it is compliant.
Mitigation Strategies (measures put in place to mitigate impact of risk events)		
Academy strategy and Operational Plan Good governance and regulatory compliance Financial sustainability Effective policies and procedures Annual monitoring and review In the unlikely event LFA is not approved for registration or after approval, was removed, we would work with the OfS to minimise the resultant disruption to affected students and applicants and comply with their requirements.		

11. Loss of key staff or industrial action

Risk Event	Risk Rating	Risk Assessment
(Scenario explanation)	(Likelihood of risk event taking place and impact)	(Assessment and evidence for this risk rating)
The unanticipated departure of key members of institution staff. Industrial action by institution staff or third parties.	Low	LFA maintains a core of full-time administrative and academic staff and a significant pool of part-time and freelance lecturers for delivery purposes. Its central London location means that its faculty base is well resourced with multiple options for re-staffing when staff are lost. The provision of a good working environment and ongoing CPD opportunities has resulted in a largely stable and long-standing team with little disruption to student/course continuity.
Mitigation Strategies (measures put in place to mitigate impact of risk events)		
HR strategy Contracts of employment, notice periods and CPD opportunities Recruitment process in place for hiring freelance tutors that assesses suitability, teaching quality and industry experience Maintaining wide pool of qualified tutors because freelance tutors are not permanent members of staff.		

LFA © Copyright

12. Disruption to Academy Activity

Risk Event	Risk Rating	Risk Assessment
(Scenario explanation)	(Likelihood of risk event taking place and impact)	(Assessment and evidence for this risk rating)
Disruption to activity (short or long term) could occur through a number of events including: fire, theft, terrorism, pandemic etc.	High	LFA operates secure premises with only one entrance/exit. CCTV is in operation. Health & Safety and Fire Safety are taken very seriously with regular checks, tests (PAT test etc.) and drills taking place. The current global pandemic has resulted in the need to adapt LFA's premises and delivery methods to satisfy government guidelines. Not all LFA provision is able to be delivered on-line so government lockdowns impact LFA's ability to deliver in-person practical classes and assessments. This risk remains high while the pandemic restricts LFA normal activities.
Mitigation Strategies (measures put in place to mitigate impact of risk events)		
Regular application of security, fire safety and H&S protocols Business interruption insurance cover LFA strategy and Operational Plan Good governance and regulatory compliance Senior Management Committee (SMC) tracking Government advice and instructions In the event that there is sustained disruption to LFA activities the LFA now has a proven track record of being able to adapt quickly. Where applicable we would look to minimise disruption by making: • changes to the delivery location or method, which may include distance learning • changes to schedules to facilitate in-person activities • changes to the staffing of a programme, including the recruitment of alternative or additional staff		

13. Loss of Trademark Agreement

Risk Event	Risk Rating	Risk Assessment
(Scenario explanation)	(Likelihood of risk event taking place and impact)	(Assessment and evidence for this risk rating)
Loss of 'London Film Academy' trading name (short on long term) will cause major disruption to our business	Low	The Film Education Training Trust (FETT) has a perpetual Trademark Licence Agreement and proper mitigation strategies in place.

LFA © Copyright

Mitigation Strategies (measures put in place to mitigate impact of risk events)
Good governance and regulatory compliance Financial sustainability Effective policies and procedures Annual monitoring and review Regular monitoring in place to ensure LFA Trademark is not being infringed on by competition in advertising

14. Loss of Building

Risk Event	Risk Rating	Risk Assessment
(Scenario explanation)	(Likelihood of risk event taking place and impact)	(Assessment and evidence for this risk rating)
Non-renewal of tenancy lease or early termination.	Low	There is a successful 20 year history with current landlord and a current tenancy agreement in place.
Mitigation Strategies (measures put in place to mitigate impact of risk events)		
Negotiate a new lease one year before it expires to give time to incorporate any financial changes or to find alternative premises.		

15. Diploma Courses Losing MA Articulation Agreement

Risk Event	Risk Rating	Risk Assessment
(Scenario explanation)	(Likelihood of risk event taking place and impact)	(Assessment and evidence for this risk rating)
The Articulation Agreement in place for MA progression from with Filmmaking Diploma is terminated which impacts students on a Student Sponsor licence and those who enrolled with LFA because of the right to progression onto an MA upon successful completion of the Diploma course	Low	There is an existing relationship through validation of BA Filmmaking with UoD with whom we have this articulation agreement. We are careful to meet the terms of the contract.

LFA © Copyright

Mitigation Strategies (measures put in place to mitigate impact of risk events)
Good governance and regulatory compliance Financial sustainability Effective policies and procedures Annual monitoring and review Diversification by obtaining other articulation agreements from another non-connected institution Pursuing MA validation that supersedes an articulation agreement

2. Refunds and Compensation

The *LFA Procedure 2.4 - Tuition Fee Refund and Compensation* terms were determined by the Senior Management Committee and developed and scripted through consultation with a firm of solicitors with particular experience and expertise in the education sector.

Wherever possible LFA will always seek to preserve continuation of study for those affected by any of the scenarios identified in Section One. This will include continued access to other support services such as learning resources and student welfare.

LFA will normally seek to 'teach out' academic programmes providing students with the opportunity to complete their course of studies. Where this is not possible alternative arrangements would be made.

In the rare event that it is not possible to arrange alternative provision, LFA commits to refund fees and compensate other costs incurred by students, according to the conditions detailed in its *LFA Procedure 2.4 - Tuition Fee Refund and Compensation.*

LFA is a long standing and experienced provider of education and training and as such maintains sufficient cash reserves to ensure business continuity in the case of exceptional events and to cover the costs of refunds and compensation as described above.

LFA © Copyright

3. Communications and Student Participation

3.1 Communicating the plan and engaging students

This plan has been developed with our students and will go through an annual periodic review cycle that will also involve students.

We will publicise our Student Protection Plan (SPP) to current and future students (and all related stakeholders) by posting it on the LFA website.

We will draw attention to it in the student communication which is sent to existing students and new applicants. LFA's Offer Letter is sent to all new applicants with a link to the SPP.
We will ensure that staff are aware of the implications of our Student Protection Plan when they propose course changes, by highlighting the SPP at the Senior Management Committee, Academic Board and Course Committee ensuring any revisions are communicated to all relevant staff via the intranet/SharePoint.

We will review our Student Protection Plan, on an annual basis, with class representatives at the Student Staff Liaison Committee meetings. All students will have the opportunity to be involved in the review by being asked by class representatives for their feedback.

3.2 Communicating material changes and supporting students

In the unlikely event that continuation of study is compromised or material changes to a course of study are necessary/unavoidable, we will inform students of any material changes to their course by email and where possible in face-to-face meetings. Notifications will also be posted on LFA's website and intranet.

For minor changes, we will notify students via our student intranet and via email of any amendments by providing as much notice as is in our view appropriate in the circumstances. Where possible, we will look to provide this notice in advance, but this may not always be possible.

For major changes, beyond academic control or such as closure or unable to provide practical content we will notify students face-to-face and also via our student intranet and via email as soon as possible, and in any event, generally no later than one month before we are due to make the relevant change. Typically, we would aim to give a full term's notice. If students do not agree with a major change we make to the course, they will be entitled to terminate the course and may be entitled to an appropriate refund of the fees paid to us plus compensation.

If we need to implement the measures in our Student Protection Plan we will offer advice, guidance and support to students on an individual basis, and collectively by convening an emergency meeting of the Student Staff Liaison Committee.

LFA will ensure that affected students are also either provided with, or signposted to, independent advice as appropriate to the given situation. Such advice could be from a collaborative partner institution, a Students Union or a legal representative.

Complaints about the implementation of any of the changes through this plan should be made via *LFA Procedure 6.6 - Complaints*.

LFA © Copyright