

LONDON FILM ACADEMY  
**STUDENT PROTECTION PLAN**  
FOR ACADEMIC YEAR 2019/2020

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## 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.

The Academy'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 at the Academy. It also considers the wider context of institutional change/closure for the Academy as a whole. The plan lays out measures the Academy 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 the college is unable to preserve continuation of study and Section 4 considers communications, student engagement and student support.

This Plan is owned by Joint Principals (the Academy's governing body) and managed by the Academy's Senior Leadership Team (SLT).



## Section One. 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

### 2.1 Risk prevention/minimisation through good governance

Good governance is the key to mitigating risk generally. The Academy 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.

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

### 2.2 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 the Academy's Terms and Conditions.

The Academy 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, the Academy will make every effort to minimise disruption by offering effected 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 the Academy will provide the necessary information, advice and guidance to allow an effective transition.



## 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:

### 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)
<p>A decision to close the institution has been taken for strategic reasons.</p> <p>We are unable or no longer intend to operate due to financial performance.</p>	Low	<p>Academy strategy has been to grow portfolio provision in the HE, Short Courses and Corporate Sectors to spread risk.</p> <p>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.</p> <p>Student numbers are growing. The Academy has long term property lease arrangements.</p>
<p><b>Mitigation Strategies</b> (measures put in place to mitigate impact of risk events)</p> <ul style="list-style-type: none"> <li>• Good governance and regulatory compliance</li> <li>• Development of a Risk Register and Business Continuity Plan</li> <li>• Quality provision</li> <li>• Course development</li> <li>• Effective marketing and recruitment campaigns</li> <li>• Financial planning and forecasting</li> </ul> <p>In the unlikely event the Academy had to close we would make immediate announcements and convene consultation meetings with students. The Academy 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 the Academy’s Refunds &amp; Compensation Policy.</p>		

### 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)
<p>De-designation of entire provision or specific courses for student support purposes (i.e. students no longer able to access SLC loans).</p> <p>Could occur if removed from OfS register or other major issue.</p>	Low	<p>Under the OfS, only LFA’s BA Courses have become eligible for loans directly and the loss risk is still considered low.</p> <p>Currently SLC facility only covers part of the course fee for BA Course. Currently only 25% of students applying or studying on our BA programme access SLC funding.</p>



**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 the Academy's Refunds & Compensation Policy.

**Withdrawal or non-renewal of franchise/validation agreement**

<b>Risk Event</b>	<b>Risk Rating</b>	<b>Risk Assessment</b>
(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 programme approval with two minor conditions. LFA has been complimented by the validating partner on the excellent quality of delivery 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 the Academy were to lose a collaborative partner we would make immediate announcements and convene consultation meetings with students. The Academy 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 Academy's Refunds & Compensation Policy.

**Suspension/closure of a course**

<b>Risk Event</b>	<b>Risk Rating</b>	<b>Risk Assessment</b>
(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	Low/Medium	LFA operates a Course Design and Approval Policy (QAE Handbook for more details) that ensures that any newly proposed programmes



course for the subsequent year.  A course fails to recruit suitable numbers.		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.
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**Mitigation Strategies** (measures put in place to mitigate impact of risk events)

<p>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</p> <p>In the unlikely event the Academy 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.</p> <p>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.</p>
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**In-year major course content changes**

<b>Risk Event</b>	<b>Risk Rating</b>	<b>Risk Assessment</b>
(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	<p>Current course provision is designed by London Film Academy so curriculum changes at the behest of LFA in conjunction with its validating partner.</p> <p>Major changes are considered to include:</p> <ul style="list-style-type: none"> <li>• External (e.g. governmental edict, change of legislation, regulatory change)</li> <li>• Resource-oriented (e.g. premises, staffing)</li> <li>• Qualitative (e.g. catastrophic failure of assessment regime, major queries from validating partner or from QAA)</li> </ul>

**Mitigation Strategies** (measures put in place to mitigate impact of risk events)

<p>Annual monitoring of programmes Module evaluations Monitoring of qualification framework changes CMA compliance</p> <p>In the event of major in-year content changes the Academy 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.</p>
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**Suspension or revocation of Tier 4 sponsor licence**

<b>Risk Event</b>	<b>Risk Rating</b>	<b>Risk Assessment</b>
(Scenario explanation)	(Likelihood of risk event taking place and impact)	(Assessment and evidence for this risk rating)
Removal or suspension of the Tier 4 Sponsor Licence (the Home Office issued licence which allows a provider to recruit international students).	Low-Medium	<p>LFA has a range of provision and whilst the number of Tier 4 students recruited is significant it does not consist more than third of the student cohort.</p> <p>Traditionally LFA has recruited no more than 15 international students but this is anticipated to double.</p> <p>In 2018 LFA had a spot inspection by UKVI and can confirm that LFA contracts, policies and produces are compliant.</p> <p>Academy-wide the risk rating is also considered to be very low as the Academy has held a licence for many years.</p> <p>The risk is considered low-medium due to the small recruitment numbers can impact the UKVI annual compliance metrics/requirements.</p>

**Mitigation Strategies** (measures put in place to mitigate impact of risk events)

Compliance 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 the Academy 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, the Academy would take all reasonable steps to minimise the disruption, for example, by assisting affected students to switch to an alternative provider.

**Drop in country-specific student demand**

<b>Risk Event</b>	<b>Risk Rating</b>	<b>Risk Assessment</b>
(Scenario explanation)	(Likelihood of risk event taking place and impact)	(Assessment and evidence for this risk rating)





<p>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).</p>	<p>Medium</p>	<p>The Academy currently enjoys a diverse and changing country representation and therefore cohorts are not dependent on enrolments from a specific country.</p> <p>We do however have a strong representation from EU nationals. It is anticipated that these EU nationals may fund part of their studies through SLC loans. After the UK's exit from the EU, the existing funding arrangements for such students may no longer be available.</p> <p>However, we already know that the government has committed to funding EU students beginning courses in the academic year 2019/2020 (and we are also confident that solutions will be found beyond that).</p> <p>Any negative changes due to Brexit could therefore not manifest until the intake in September 2020 (i.e. beyond the scope of this plan). LFA may then experience some drop in demand but does not anticipate this to be sudden or large since many EU nationals will gain 'settled status' and therefore qualify for loans as 'Home' students. We have therefore ranked this risk as medium.</p>
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**Mitigation Strategies** (measures put in place to mitigate impact of risk events)

Diversification of marketing channels

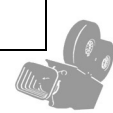
LFA is mitigating any risk of a fall in demand by building a strategy to target more UK students and non-EU students.

Central to this strategy was LFA recently becoming a 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 participation plan which will bring the fees bring them more in line with SLC funding.

LFA has a Tier 4 licence so can increase its recruitment of non-EU students.

**Loss of 'Confidence' from the QAA**

Risk Event	Risk Rating	Risk Assessment
(Scenario explanation)	(Likelihood of risk event taking place and impact)	(Assessment and evidence for this risk rating)
<p>The Academy fails to meet the educational oversight expectations of the Quality Assurance Agency (QAA)</p>	<p>Low</p>	<p>LFA has been reviewed for Educational Oversight by QAA since 2011 and continues to make acceptable progress and through HER (AP) reviews as a strong understanding of academic standards.</p> <p>Furthermore, LFA takes its regulatory obligations very seriously. QAA reviews have consistently</p>



cited the Academy for its adherence to quality standards for the past 8 years.

**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 the Academy 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.

**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 only recently been given validated by University of Derby and it has not yet completed its first cycle course delivery. However, LFA chose to work with University of Derby (TEF Gold) because of its robust procedures in place when offering validation.  LFA was award partner approval by University of Derby with no conditions (rare) and the course was given approval subject to a handful of conditions and the first cohort started September 2018.  We have gone through our first interim assessment board in March 2019 and been complimented on the quality of the programme 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, the Academy 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.



### Loss of OfS registration

<b>Risk Event</b>	<b>Risk Rating</b>	<b>Risk Assessment</b>
(Scenario explanation)	(Likelihood of risk event taking place and impact)	(Assessment and evidence for this risk rating)
The OfS does not approve the Academy's admission to the Register or removes it (giving rise to students being unable to access student loans and loss of UKVI licence)	Low	The Academy only joined OfS in January 2019 for Course Designation 2018/19 to it has yet to submit a return. LFA has identified the additional 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.
<b>Mitigation Strategies</b> (measures put in place to mitigate impact of risk events)		
<p>Academy strategy and Operational Plan            Good governance and regulatory compliance            Financial sustainability            Effective policies and procedures            Annual monitoring and review</p> <p>In the unlikely event the Academy 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.</p>		

### Loss of key staff or industrial action

<b>Risk Event</b>	<b>Risk Rating</b>	<b>Risk Assessment</b>
(Scenario explanation)	(Likelihood of risk event taking place and impact)	(Assessment and evidence for this risk rating)
<p>The unanticipated departure of key members of institution staff.</p> <p>Industrial action by institution staff or third parties.</p>	Low	<p>LFA maintains a core of full-time administrative and academic staff and a significant pool of part-time and freelance lecturers for delivery purposes.</p> <p>Its central London location means that its faculty base is well resourced with multiple options for re-staffing when staff are lost.</p> <p>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.</p>
<b>Mitigation Strategies</b> (measures put in place to mitigate impact of risk events)		
<p>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</p>		



**Disruption to college activity**

<b>Risk Event</b>	<b>Risk Rating</b>	<b>Risk Assessment</b>
(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, etc.	Low	The Academy operates secure premises with only one entrance/exit. CCTV is in operation in. Health & Safety and Fire Safety are taken very seriously with regular checks, tests (PAT test etc) and drills taking place.
<b>Mitigation Strategies</b> (measures put in place to mitigate impact of risk events)		
Regular application of security, fire safety and H&S protocols Business interruption insurance cover		

**Losing Trademark Agreement**

<b>Risk Event</b>	<b>Risk Rating</b>	<b>Risk Assessment</b>
(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 FETT has a perpetual Trademark Licence Agreement and proper mitigation strategies in place.
<b>Mitigation Strategies</b> (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		

**Losing Building**

<b>Risk Event</b>	<b>Risk Rating</b>	<b>Risk Assessment</b>
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(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 18 year history with current landlord and a tenancy agreement in place until 2028.
<b>Mitigation Strategies</b> (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.		

### **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 or Screenwriting Diploma is terminated which impacts students on a Tier 4 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 University of Derby with whom we have this articulation agreement.  We are careful to meet the terms of the contract.
<b>Mitigation Strategies</b> (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		



## Section Two. Refunds and Compensation

The LFA “Refund and Compensation Policy” terms were determined by senior management and developed and scripted through consultation with a firm of solicitors with particular experience and expertise in the education sector.

Wherever possible the Academy 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.

The Academy 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, the Academy commits to refund fees and compensate other costs incurred by students, according to the conditions detailed in its Refund and Compensation Policy.

The Academy 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. However, the Academy recognises the benefit of seeking ways to strengthen this position so will be investigating opportunities to protect refund and compensation costs through an insurance policy.



## Section Three. Communications and Student Participation

### 4.1 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 and internal student intranet.

We will draw attention to it in the student communication which is sent to existing students and new applicants. The Academy's Offer Letter is sent to all new applicants with the SPP and is also referenced within the Academy's Tuition Fee Terms & Conditions.

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 Executive Committee, Course Committee and Course Deliverers Team meetings and 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.

### 4.2 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 the Academy'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 the Academy's Student Complaints Procedure.

