

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: enquiries@icmp.ac.uk

Student protection plan for the period 2024 - 2028

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 Management Ltd. trades under two distinctive brands:

- The Institute of Contemporary Music Performance (ICMP) and,
- SAE Institute UK (SAE UK)

ICMP Management Ltd. has a well-developed and embedded process for the regular monitoring and assessment of risk, with ultimate responsibility for both ICMP and SAE UK provision resting with the Corporate Board, the 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 Management Ltd. also has a well-developed and periodically tested Business Continuity Policy which details the procedure for the management of risks should they materialise.

This Student Protection Plan will be revised regularly, aligned with the quarterly review of overall risk for ICMP Management Ltd. to ensure that the risk assessment remains current and the mitigating measures remain practicable, relevant and effective. This Student Protection Plan has also been reviewed and endorsed by our Student Senate.

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 Management Ltd. 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 Management Ltd. We have assessed the likelihood of this risk materialising as **very low** for the following reasons:

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- 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 Management Ltd. is regulated by the Office for Students (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 Management Ltd. appoints an external auditor to audit its financial statements annually, providing an independent voice with regard to the company position as a going concern.
- iv. ICMP Management Ltd. has access through intercompany funding facilities for financing. ICMP Management Ltd. has an effective long-term relationship with Lloyds, and the merger with SAE Institute UK brings an effective relationship with HSBC as another banking partner. Further, ICMP Management Ltd has low levels of leverage; continues to attract sufficient student numbers to fill its facilities; 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 Management Ltd. 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 Management Ltd. Operates at a number of facilities. Building lease information is noted in the table below.
- vii. ICMP Management Ltd. was successfully registered with the OfS in 2018 and subsequently was awarded time-limited DAPs in 2021.
- viii. ICMP Management Ltd. joined the AD Education Group in 2023, providing even greater stability and sustainability into the future. There is no intention of discontinuing ICMP Management Ltd. operation.
- ix. Based on this we consider it is highly unlikely that ICMP Management Ltd. would fail financially; would have its licences to operate withdrawn; would be unable to deliver the whole or part of its portfolio of programmes, or any other similar scenario that would cause the institution to cease all or part of its operations.

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Location	Lease Information
Liverpool - 38	Georgia House, 38 Pall Mall, Liverpool, L3 6AL
Liverpool - 42	Rear Ground Floor, 42 Pall Mall, Liverpool, L3 6AL
London - Kingsland	Ground to Sixth Floor, 293 – 297 Kingsland Road, London, E8 4DQ
London - Bankstock	Ground and First Floor, 42 – 44 De Beauvoir Crescent, London, N1 5SB
Leamington Spa	Nursery, 5A Spencer Yard, Spencer Street, Leamington Spa, CV31 3SY
Glasgow - Portman	85 / 97 Portman Street, Kinning Park, Glasgow, G41 1EJ
Glasgow - Stanley	70 Stanley Street, Glasgow, G41 1JB
ICMP - Dyne Road	1B Dyne Road, London, NW6 7XG
ICMP - Queen's Park	76-78 Salusbury Road, London, NW6 6PA

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:

- ICMP Management Ltd. has in place a business continuity insurance policy that would provide sufficient funds to make alternative arrangements for students should any unforeseen event occur which meant it could not continue to deliver the provision.
- ICMP Management Ltd's default position would be to offer teach out of the programme to enable students to complete their studies. In the event that this is not possible, students will be supported in transferring to alternative campus within the group, or another suitable provider to continue their studies.
- In the event that transfer is not possible (due to personal circumstances such as those related to wellbeing, disability or other significant factors), ICMP Management Ltd will offer alternative forms of compensation where appropriate. Each case will be considered on an individual basis, in accordance with the Refund Policy, ensuring that all relevant factors are taken into account and that the student's specific needs are addressed. This provision reinforces our commitment to fairness and inclusivity, ensuring that no student is disadvantaged as a result of personal circumstances beyond their control.
- ICMP Management Ltd. ensures that financial management is sound to ensure sufficient liquidity and has in place clear and published policies in order to be able to refund fees or provide compensation should that ever become necessary
- ICMP Management Ltd. has developed and tested business continuity plans in order that an established procedure is in place to manage this scenario should it ever occur.

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2. ICMP Management Ltd. 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 Management Ltd. We have assessed the likelihood of this risk materialising as **very low** for the following reasons:

ICMP Management Ltd. is in possession of time-limited Full Degree Awarding Powers (DAPs) with the expectation of transferring to indefinite DAPs from December 2025. ICMP Management Ltd. also has a Collaborative Partnership with the University of Hertfordshire (UoH) and the portfolio of programmes delivered under the SAE Institute UK brand are validated by UoH. This duality of provision helps to spread the risk of this scenario materialising. The principal risks are the revocation of ICMP Management Ltd's Degree Awarding Powers, or the withdrawal of UoH's Collaborative Agreement.

ICMP Management Ltd has many years experience of building and maintaining successful academic partnerships with validating providers. These include the University of East London, the University of South Wales, Middlesex University, and Pearson. We have been subject to successive successful collaborative reviews and quality assessments with no cause for concern. The risk of failure of such a collaborative arrangement is therefore **very low**.

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

- There is a 2-year notice period for the termination of the UoH collaborative arrangement providing sufficient time to either:
 - Identify and establish a new collaborative arrangement with an alternative provider and validate all relevant programmes in accordance with the awarding bodies requirements; or,
 - Validate the affected programmes through our proprietary Full Degree Awarding Powers in accordance with our existing processes for the validation of programmes
- In the event of the collaborative arrangement terminating before the 2-year notice period (for instance, in the unlikely event of UoH becoming insolvent), ICMP Management Ltd. is able to expedite the validation of the affected programmes using our proprietary Full Degree Awarding Powers.
- Arrangements with UoH to extend its validation arrangements to other programmes in our portfolio in the event of ICMP Management Ltd. having its Full Degree Awarding Powers revoked.

3. Closing of a Campus

In this scenario, a campus operation would cease to exist and decision made to teach out the provision at a specific campus. Therefore, students studying at the impacted campus would not be able to complete their studies as planned. We have assessed the likelihood of this risk materialising as **low** for the following reasons:

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- 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 for ongoing sustainability of our campus operations.

In the unlikely event that a business decision is made, or the Institute has no other viable option but to close a campus operation, the following measures are in place including, and not limited to:

- Our default position would be to offer teach out of the programme to enable students to complete their studies. In the event that this is not possible, students will be supported in transferring to alternative campus within the group, or another suitable provider to continue their studies.
- Student will be offered support and guidance with financial support, such as SLC or SAAS applications.
- Under formal agreements signed with the institution, students may be allowed to continue to study on an identical or equivalent award offered by university partners.
- In the event that transfer is not possible (due to personal circumstances such as those related to wellbeing, disability or other significant factors), ICMP Management Ltd will offer alternative forms of compensation where appropriate. Each case will be considered on an individual basis, in accordance with the Refund Policy, ensuring that all relevant factors are taken into account and that the student's specific needs are addressed. This provision reinforces our commitment to fairness and inclusivity, ensuring that no student is disadvantaged as a result of personal circumstances beyond their control.

4. One or more of ICMP Management Ltds study locations is no longer available

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

ICMP Management Ltd. operates from 5 locations across the UK. This comprises 2 campuses in London split across 4 buildings, 1 campus building in Liverpool, 1 campus building in Leamington Spa, and 1 campus split across 2 buildings in Glasgow (*please refer to table 1 in the above section*).

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. 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 Management Ltd's study locations is no longer available, as follows:

- In London, our multiple buildings allow for the relocation of physical teaching to one or more alternative sites.
- Extension of timetabled hours allows ICMP Management Ltd. to further maximise the physical resource available

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- ICMP Management Ltd. has existing relationships with third party providers of specialist spaces such as rehearsal rooms and recording studios
- ICMP Management Ltd. is adept at delivering synchronous online lectures and classes and this can be used to alleviate pressure on physical facilities in the short-term
- Outside of London, ICMP Management Ltd. is committed to renting appropriate alternative spaces within a reasonable distance of the facility as required
- We will facilitate discussions with other local Higher Education Institutions for students to transfer temporarily to use facilities.
- We will facilitate short-term travel and accommodation reimbursement options to provide access to other facilities
- Through a combination of the above ICMP Management Ltd. is able to create alternative arrangements to ensure the ongoing delivery of a high quality student experience in the event of reduced estate.

5. ICMP Management Ltd. 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 Management Ltd. 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. 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 Management Ltd. is unable to deliver courses in one or more subject areas or departments, as follows:

- In London, ensuring our estates development plans guard against any single subject area becoming overly reliant on a single building.
- Deploying appropriate 'teach-out' arrangements in the event of institutionally agreed programme closures. Or, where appropriate, transfer to another campus within the Group.
- Approaching other sector providers with comparable provision, supporting and facilitating the transfer of students to other providers, and the provision of all necessary documentation to assure the transfer of accrued academic credit.
- In the event that transfer is not possible (due to personal circumstances such as those related to wellbeing, disability or other significant factors), ICMP Management Ltd will offer alternative

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forms of compensation where appropriate. Each case will be considered on an individual basis, in accordance with the Refund Policy, ensuring that all relevant factors are taken into account and that the student's specific needs are addressed. This provision reinforces our commitment to fairness and inclusivity, ensuring that no student is disadvantaged as a result of personal circumstances beyond their control.

6. ICMP Management Ltd 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 Management Ltd. 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 industries we serve 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 Management Ltd. is no longer able to deliver material components of one or more courses, as follows:

- In London, ensuring our estates development plans guard against any single subject area becoming overly reliant on a single building
- Ensuring our approach to staffing guards against any aspect of the provision becoming vested in too few expert teachers
- Regular faculty reviews and recruitment exercises in line with the above
- Deploying appropriate 'teach-out' arrangements in the event of institutionally agreed programme closures or, where appropriate, transfer to another campus within the Group.
- In the worst case, approaching other sector providers with comparable provision, supporting and facilitating the transfer of students to other providers, and the provision of all necessary documentation to assure the transfer of accrued academic credit.
- In the event that transfer is not possible (due to personal circumstances such as those related to wellbeing, disability or other significant factors), ICMP Management Ltd will offer alternative forms of compensation where appropriate. Each case will be considered on an individual basis, in accordance with the Refund Policy, ensuring that all relevant factors are taken into account and that the student's specific needs are addressed. This provision reinforces our commitment to fairness and inclusivity, ensuring that no student is disadvantaged as a result of personal circumstances beyond their control.

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7. ICMP Management Ltd. 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 Management Ltd. were to decide to withdraw a particular mode of study, which is not in any of our current or long-term plans.

8. ICMP Management Ltd. 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 Management Ltd. We have assessed the likelihood of this risk materialising as **very low** for the following reasons:

ICMP and SAE UK's admissions policy and procedures have 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 Student Wellbeing Team, who work with the applicant and the Academic Team to determine the appropriate level of support to be provided by the ICMP Management Ltd. 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 Student Route licence with the UKVI to properly enrol and monitor attendance of sponsored students and should we for any reason lose our Student Route 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

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9. ICMP Management Ltd. loses its right to recruit and retain sponsored students through its 'Student Route' Licence

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

As stated above, ICMP Management Ltd. maintains a sponsorship licence with the UK Visas and Immigration service (UKVI) for the recruitment and retention of sponsored students. In order to retain this licence, which is reviewed annually, ICMP Management Ltd. ensures continual compliance with the terms of the Student Route 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 Student Route licence and their obligations.

In the event that we lose the right to recruit and retain international students through our Student Route 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 a *Student Refund Policy* that illustrated the circumstances for determining student eligibility for refund.
- 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 Management Ltd. loses its right for students to access student loan funding for any reason

As a registered provider of the Office for Students (OfS), eligible ICMP and SAE UK students on full-time undergraduate programmes can access tuition fee loans up to the higher statutory fee limit amount 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 Management Ltd. 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 Management Ltd. is a registered provider of the Office for Students with no interventions or sanctions
- ICMP Management Ltd. successfully achieved time-limited degree awarding powers in 2021 after a period of intense scrutiny
- ICMP Management Ltd. ensures ongoing compliance with the conditions of registration through a range of mechanisms that are well documented in our governance processes
- ICMP Management Ltd. ensures extensive engagement with the student body to ensure any complaints are properly addressed and student satisfaction is optimised

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- ICMP Management Ltd. maintains effective data management systems to ensure data and information is provided as required by the OfS for regulatory monitoring

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:

- 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.
 - Our default position would be to offer teach out of the programme to enable students to complete their studies. In the event that this is not possible, students will be supported in transferring to alternative campus within the group, or another suitable provider to continue their studies.
 - In the event that transfer is not possible (due to personal circumstances such as those related to wellbeing, disability or other significant factors), ICMP Management Ltd will offer alternative forms of compensation where appropriate. Each case will be considered on an individual basis, in accordance with the Refund Policy, ensuring that all relevant factors are taken into account and that the student's specific needs are addressed. This provision reinforces our commitment to fairness and inclusivity, ensuring that no student is disadvantaged as a result of personal circumstances beyond their control.
- 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. In addition there are strategic initiatives that further mitigate the risks identified in Section 1:

- Our ongoing Estates Strategy further ensures that no part of our provision becomes over-reliant on a specific campus or building
- Our commitment to further developing our digital learning and teaching capability and the quality of both synchronous and asynchronous online learning
- Our commitment to achieving indefinite Full Degree Awarding Powers from December 2025

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- Ongoing consideration of institutional and strategic risk through the governance structure on a routine basis. This policy is overseen and approved by the Senior Management Team, reporting to the ICMP Management Ltd Corporate Board.

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

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- SAE Institute UK (SAE UK)

At the time of preparing this Student Protection Plan, the distinctive brands operate their own terms and condition with respect to refunds. The below referenced documents provide further information on the processes in place to refund tuition fees and other relevant costs in the event we are no longer able to preserve continuous of study.

- ICMP Student refund policy
- SAE Terms and conditions

Workstreams are underway to develop and deliver a single policy from the next intake.

As noted in the previous section above:

- 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.
 - Our default position would be to offer teach out of the programme to enable students to complete their studies. In the event that this is not possible, students will be supported in transferring to alternative campus within the group, or another suitable provider to continue their studies.
 - In the event that transfer is not possible (due to personal circumstances such as those related to wellbeing, disability or other significant factors), ICMP Management Ltd will offer alternative forms of compensation where appropriate. Each case will be considered on an individual basis, in accordance with the Refund Policy, ensuring that all relevant factors are taken into account and that the student's specific needs are addressed. This provision reinforces our commitment to fairness and inclusivity, ensuring that no student is disadvantaged as a result of personal circumstances beyond their control.
- 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

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

ICMP Management Ltd's Student Protection Plan is published on the website and students are directed to the plan through the online registration process, which all new and returning students are required to complete.

The consideration of programme and policy developments are well established within ICMP Management Ltd's governance framework. All new policies and policy amendments are approved by the relevant parent committee to ensure necessary stakeholder consultation.

We will inform our students if there are to be material changes to their programme of study through our extensive student voice mechanisms including, Programme Committee Meetings, Student Senate, and where appropriate Townhall meetings as well as more traditional means of communication e.g. email and the VLE.

As soon as practical any material changes would be discussed and consulted with the student body. In the case of course transfer or course closure without teach out students would be able to access support through our Student Services and Registry Teams.