

## Student Protection Plan for the Academic Year: 2019/20

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Approving Body	Board
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For general enquiries regarding this student protection plan, please contact David Howell at the above address, or by emailing: davidhowell@metfilm.co.uk. For enquiries which have arisen because this Plan has been invoked, please use the contact provided to you as part of that process.

### Introduction

As a higher education provider registered with the Office for Students (“OfS”), MetFilm School Limited (the “School”, “we”) must publish a Student Protection Plan which sets out how continuation and quality of study will be preserved for current and potential students of:

- all validated Undergraduate and Postgraduate courses, in London; and
- all validated Undergraduate and Postgraduate degrees, in Berlin,

(together, our “Accredited Courses”).

This agreement only applies to students on our validated courses, as opposed to subcontracted courses.

Students enrolled on our subcontracted courses, under the label ScreenSpace, are subject to The University of West London’s student protection plan (click [here](#)).

This Student Protection Plan (the “Plan”) has been drawn up to set out the measures that we will take in order to protect our students’ continuation of study on Accredited Courses in the event of changes to or closure of such Accredited Course, or closure of a campus or the School, as described in this Plan.

We acknowledge however that a single measure to allow our students to continue their studies might not be uniformly appropriate for all students in each instance, for example we understand that for some students moving to an alternative course may be acceptable, whereas others may wish to transfer to a different provider. In each case we undertake to provide tailored support to students who need it, whatever measure is adopted, including one-to-one consultations and equality impact assessments where necessary.

This Plan will be reviewed regularly, including through an annual review process, to ensure it continues to be relevant, effective and achievable. Reviews will be conducted in collaboration with the Academic Board (which has student representation).

### **Part 1: Risks to continuation of study and the measures we have in place to protect our students against those risks which are reasonably likely to crystallise**

The Part 1 sets out:

- our assessment of the range of risks which may arise to the continuation of study of Accredited Courses;
- the likelihood of these risks crystallising;
- the measures we have in place to protect students against those risks which we believe are reasonably likely to crystallise; and
- how the differing needs, characteristics and circumstances of our students will be taken into account.

#### **Risk 1: The School is no longer able to deliver material components of an Accredited Course (including, for example, key modules) due to changes or enhancements being made by us**

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An ongoing commitment to quality and course enhancement, both by the School and our validating partner the University of West London (“UWL”), means that from time to time we may make significant changes to our Accredited Courses.

The risk that such changes will affect students’ continuation of study is low however, because, for changes that are within our control, we will always take steps to avoid making changes during an academic year, or close to the start of an academic year. Changes will instead be made over a long cycle, and, in the event of substantial changes, after consultation with the School’s Academic Board (which includes student representatives and representatives from UWL and our external examiners).

#### **Risk 2: The School is no longer able to deliver material components of one or more Accredited Courses, due to single-person dependencies, such as particular members of our teaching staff**

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The risk that we are unable to deliver a material component of one or more Accredited Courses due to availability of one or more members of our teaching staff is low, because the School works with a diverse range of freelance tutors to deliver our programmes and so any single-person dependencies may be mitigated by moving other current members of staff with appropriate skills and experience, into the vacant post(s) or by recruiting externally.

The group of companies to which the School belongs is extremely active in the field of film production and distribution. Given that many of our Board members, staff, and freelance tutors are active in the industry we feel we are well placed to access a large pool of replacement tutors in order to continue delivering our courses through working screen professionals, with postgraduate teaching qualifications and Higher Education Academy membership.

### **Risk 3: The School is no longer able to deliver a particular Accredited Course to students, or is considering closing an Accredited Course, for reasons of commercial viability**

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In certain circumstances we may make a strategic decision to close a particular Accredited Course. The likelihood of this risk affecting continuation of study for current students is considered extremely low because we give our students a 'teach-out' commitment.

A 'teach-out' refers to the phased approach by which such closure will operate, allowing current students of such Accredited Course to complete their studies before the closure. Our priority would always be to ensure as many of our students as possible completed their programme of study to the original timescale.

Whilst we believe that the likelihood of this risk affecting continuation of study for future students is also unlikely, in the event of this risk crystallising we would seek to mitigate any disruption to continuation of study by:

- communicating with those who have not yet started with the School but with whom the School has entered into a contract for a future place on an Accredited Course, such that:
  - any future students who have secured a place on an affected Accredited Course, but have not yet started such course, will be offered an alternative course at the School, or a refund of fees in line with our Refund and Compensation Policy (click [here](#))
  - any future students who have secured a place on the BA (Hons) Content, Media & Film Production, delivered through ScreenSpace, will be informed in accordance with UCAS deadlines, allowing time for those students to source an alternative suitable programme (where relevant) at the School, or elsewhere, and students will be entitled to receive a refund of fees already paid, and may be entitled to compensation, as set out in our Refund and Compensation Policy (click [here](#)).
- In each case we will consider the needs of those students who may be particularly affected or need additional support and where appropriate, impact assessments will be undertaken to consider the potential impact on individual students and seek to minimise disruption. For example, students in receipt of a bursary will continue to receive that bursary should they opt to study an alternative Accredited Course at the School. International students will receive guidance and support from our compliance team, who will assist with finding an alternative course with another Tier 4 sponsor, should the affected students opt to study elsewhere.

### **Risk 4: One or more School locations is no longer available, either due to closure, or a significant change to that location**

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The risk that the School is no longer able to deliver Accredited Courses at any of its teaching locations is considered low, given:

- our long-established presence in Ealing Studios, London where we have been based since 2005. Whilst Ealing Studios have a contractual right to terminate this tenancy, we consider the risk to students' continuation of study to be low given our relationship with our landlord, and our valued presence within the Studio ecosystem, making such termination a low likelihood;
- our strong relationship and lease arrangements with the landlord for our Berlin teaching location mean that the risk of any unplanned, short-term termination of the tenancy is highly unlikely. Whilst a low likelihood, any termination of the lease by the landlord is expected to be communicated early and collaborative so as to provide the School with enough time to make alternative arrangements at a nearby Berlin location, to preserve continuation of study.

## **Risk 5: Risk of the School's loss or suspension of accreditation from regulatory bodies (e.g. QAA)**

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The risk that one of our accreditations is lost, suspended or not renewed (resulting in the potential withdrawal of statutory student finance for its Accredited Courses) is considered low because we are aware of and up to date with the requirements needed in order to be accredited or licenced by such bodies and have processes in place to regularly review and renew such accreditation or licences, including changes in regulation or regulatory guidance.

In the event such a risk crystalizes the School will take all reasonable steps to seek to ensure continuity of study by working with the relevant body or bodies, UWL, and the OfS to allow enrolled students to complete their programme by:

- provide a 'teach-out' of Accredited Courses through UWL, such that students can continue their studies at the School (operated by UWL) or at UWL; or
- in the unlikely event a teach-out through UWL is not possible, providing reasonable support to students in transferring to appropriate programmes at an alternative provider (for example, providing a transcript of each student's academic credits so that they may gain recognition for their learning at another institution); and
- in each case providing appropriate and reasonable refunds and/or compensation for demonstrable direct losses in the circumstances set out in our Refund and Compensation Policy (click [here](#)).

In each of the above cases we will consider the needs and circumstances of all students particularly affected by the changes: recognizing that a 'one size fits all' approach will not be appropriate. For example:

- If we are unable to secure an arrangement for affected students to continue to access student tuition and maintenance loans, including those making new loan applications, for the remainder of their studies we will explore options through the 'teach-out' arrangement with UWL to enable affected students to restore access to student support whilst also continuing their studies at the School, or at UWL;
- international students will receive guidance and support from our compliance team, who will assist with finding an alternative course with another Tier 4 sponsor, and, for students with particular support arrangements – such as agreed time-out or exam re-sit arrangements – we will offer reasonable support to ensure such arrangements are honoured by any alternative provider.

In addition to the above steps we would take steps to restore our designation as quickly as possible.

## **Risk 6: The Schools is unable to recruit or teach international students due to withdrawal of Tier 4 Sponsor Licence**

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The risk that the School's UKVI Tier 4 sponsorship license being withdrawn is considered low because we have held such a license since the scheme was introduced and have passed all compliance tests to date and intend to do so in the future. We have a dedicated Compliance Manager and systems, checks and balances to ensure that we meet our obligations in full and maintain our licence.

There are risks, however, that additional restrictions on international students will be imposed as a result of the Brexit negotiations. We have yet to receive clarity in this regard and will update this SPP once we have further clarity on what impact, if any, the consequences of the UK leaving the EU will have on our ability to teach international students.

In the unlikely event that entry to the UK was not possible, we would be able to offer students continuation of their studies at the MetFilm School Berlin campus.

**Risk 7: The School is no longer able to deliver recognised UK degrees, due to a withdrawal of validation by UWL**

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Whilst the School itself does not have degree-awarding powers, our Accredited Courses lead to recognised UK degrees, because we are 'validated' by UWL, which does have degree-awarding powers.

The risk of UWL withdrawing the School's validation is considered extremely low, given the long and established partnership between the two parties and our shared mutual undertaking to protect our students' interests. We are aware of and up to date with the requirements needed in order to be validated by UWL and have processes in place to regularly review and renew such requirements, in collaboration with UWL.

In the unlikely event of a withdrawal of validation by UWL, UWL have defined closure procedures, and are committed to a smooth transition to an alternative validating partner, and would facilitate that in the interests of the student.

**Risk 8: The School as a whole is no longer able to operate, or decides to cease operations, for reasons of financial performance.**

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As with all organisations, an extreme set of events could lead to the prospect of the School being closed or a decision taken by the shareholders to exit the market served by the School. This may be triggered, for example, by the School becoming insolvent or through falling student demand, withdrawal of validation or regulatory matters, or a major event rendering the School's mission non-viable.

We consider the risk of being unable to operate due to financial instability or unsustainability to be low given the School's diverse range of undergraduate, postgraduate and non-Accredited courses ranging across two campuses, in London and Berlin. These courses serve different markets which in itself serves to mitigate any commercial or financial risk across the School, which has been operating since 2003. In addition, we are also well supported by our majority shareholders, who have provided us with financial instruments on competitive terms, to support cash flow management.

However in the event that the School is no longer able to operate for any reason, UWL is committed to provide a 'teach-out' of Accredited Courses through UWL, such that students can continue their studies at the School (operated by UWL) or at UWL.

**Part 2: Information about the policy the School has in place to refund tuition fees and other relevant costs to students and to provide compensation where necessary in the event that the School is no longer able to preserve continuation of study**

We have a Refund and Compensation Policy which can be found on our website. It outlines the circumstances in which we will refund tuition fees and other relevant costs to students and to provide compensation where necessary if we are no longer able to preserve continuation of study, and may be implemented as a result of any of the risks in this Plan occurring.

We consider refunds and compensation to be a remedy of last resort and are committed to doing all we can so that refunds and compensation aren't necessary.

Notwithstanding this fact, we recognise that there could be an increase in such payments given the introduction of this Plan and we will target growth in our retained earnings/cash reserves to be able to fund any estimated cost increases.

### Part 3: Information about how we will communicate with students about our student protection plan

We will publicise our student protection plan to current and future students and staff members by publishing it on our website. We will also include a reference to it in our Student Handbook, provided to all students at the outset of their study.

Should our student protection plan need to be implemented, we will communicate with affected students appropriately. For example:

- We will inform our students if there are to be material changes to their Accredited Course in line with the undertakings made in the relevant Accredited Course Terms and Conditions (see [here](#))
- We will ensure, in collaboration with the School student representatives and UWL, that any affected students receive appropriate advice and support on the impact on their studies including their right to refunds, and if applicable, compensation or alternative replacement study.
- We will support affected students, by providing a forum to discuss the implications to the students' study. The nature of the advice and support will vary from risk to risk and depend upon the impact and will normally be determined in consultation with our Students' Union.
- Students will have the opportunity to raise complaints about the way in which we are implementing or not implementing this Plan or the way in which they have been dealt with or affected by an event, by using the School's Complaints Procedure which can be found [here](#).