



Student Protection Plan

Protecting your studies: What the ICMT will do if things go wrong

Document Control

Document Title	Student Protection Plan
Reference	ICMT-SW-001
Last Review	April 2026
Next Review	April 2027
Owner	Head of Operations
Approved by	Governing Body
Version	2.0

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1. Introduction

The International College of Musical Theatre (ICMT) has a primary obligation to ensure that every enrolled student completes their studies. This Student Protection Plan sets out how we identify and manage risks to that commitment, and what we will do to protect students if any of those risks materialise.

The ICMT is registered with the Office for Students (OfS) and, under Condition C3 of the OfS Regulatory Framework, is required to have an approved Student Protection Plan. This plan meets that requirement. It has been approved by the ICMT's Governing Body and submitted to the OfS for approval prior to publication.

We offer one higher education programme: the BA (Hons) Musical Theatre Performance, delivered as an accelerated two-year degree at our Hackney Wick, London, site and validated by Coventry University. Our student body is small. That means we can be more responsive and more personal in how we support students than a larger institution might be, but it also means we are honest about the fact that risks which would affect only part of a large university's operation would, at the ICMT, likely affect all of our students at once. This plan reflects that reality directly.

The point of contact for all queries about this plan is Gary Wood, Head of Operations: gary@theicmt.com / 0207 253 3118.

2. Purpose

This plan sets out the ICMT's assessment of the risks to the continuation of study for our students, how those risks may differ depending on students' individual needs, characteristics and circumstances, and the likelihood that those risks will materialise. For each risk we consider reasonably likely to crystallise, the plan sets out the measures we have put in place to mitigate it and the actions we will take to protect students if it does.

The plan also sets out what students are entitled to if continuation of study cannot be preserved, including refunds, compensation and transfer support, and how we will communicate with students if the plan needs to be implemented.

Where a significant material change to the ICMT's provision is proposed, we will assess the impact on students, carry out an equality impact assessment, and consult affected students before any change is made.

This plan is reviewed annually. Where material changes to the ICMT's circumstances occur between annual reviews, including changes to our validation arrangements, financial position, or regulatory status, the plan will be revised and resubmitted to the OfS as required.

3. Scope

This plan applies to all students enrolled at the ICMT, regardless of which programme they are studying. This includes students on the BA (Hons) Musical Theatre Performance, the foundation course, and any short course or professional development programme offered by the ICMT.

The OfS's Condition C3 requires student protection plans to cover students enrolled on regulated higher education provision, in ICMT's case, the BA. The ICMT has chosen to extend the protections in this plan to all of its students as a matter of institutional commitment, not regulatory obligation. Where a risk crystallises that affects students across multiple programmes, all affected students will be supported under this plan.

Students who are temporarily interrupting their studies, completing a resit, or deferring an element of their programme remain enrolled and are covered by this plan during that period. Their individual circumstances will be taken into account in any assessment of impact or support.

A note on Coventry University's Student Protection Plan.

Students on the BA are registered for a Coventry University award. Coventry University maintains its own OfS-approved Student Protection Plan covering the integrity of its degree awarding powers and its obligations as the awarding body. The ICMT's plan covers the continuation of studies at ICMT, teaching, the site, and the institutional operations that deliver the programme. Both plans are relevant to BA students and operate in parallel. If you have any questions about Coventry's plan, contact Coventry University directly or visit their website.

4. Assessment of Risks

The ICMT offers a single programme of higher education, the BA (Hons) Musical Theatre Performance, delivered at a single site in Hackney Wick, London, by a small permanent faculty, and validated by a single partner, Coventry University. The foundation course is delivered at the same site by the same team. This concentration of provision is the defining characteristic of the ICMT's risk profile: a risk that disrupts ICMT's operations affects all of its students simultaneously, not just a subset. The ICMT currently delivers all of its provision full-time and in person. The ICMT is exploring the possibility of offering distance learning provision in the future. If this proceeds, the risk assessment in this plan will be updated to reflect any new risks to students arising from a change in mode of delivery

Risks have been assessed against three dimensions:

- **Likelihood:** How probable it is that the risk crystallises during this plan period.
- **Unmitigated impact:** The severity of impact on students if no protective action were taken.
- **Post-mitigation impact:** The residual impact on students after the measures described in section 5 are applied.

Severity has been assessed across four factors:

- The number of students affected.
- Where the student is in their programme when the risk crystallises.
- The financial consequences.
- The differential impact on students with particular characteristics or circumstances.

Students identified as facing potentially higher impact include:

- International students, particularly where visa or immigration status is implicated.
- Students with disabilities, for whom changes in location or delivery mode may create disproportionate disruption.

- Students in financial hardship
- Students in the later stages of their programme, for whom transfer would be most costly and disruptive.

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Risk Area	Mitigating factors currently in place	Likelihood of crystallising
ICMT ceases to operate in whole or in part	• Five-year business plan reviewed annually by the Governing Body. • Monthly management accounts reported to directors. • Cost reduction programme. • Income diversified beyond tuition fees. • Commitment to establishing a dedicated reserve sufficient to fund an orderly teach-out or wind-down.	Medium The OfS raised concerns about financial sustainability following a recent meeting. The mitigating factors in place reduce the likelihood of cessation materialising, but do not eliminate it at this time.
Loss of validation/inability to award qualifications	• Validation arrangement with Coventry University is in place with a defined end date. • Coventry has confirmed it will teach out the final enrolled cohort, protecting those students' ability to complete their awards. • The ICMT is actively procuring a new validation partner. • Contingency arrangements for the transition between validators are under development.	Medium The Coventry arrangement has a fixed end date. The risk that no new validator is confirmed in time to maintain continuity of validated provision is possible and dependent on the procurement timeline.
Loss of premises/change in location	• Lease in place at current premises in Hackney Wick, London, with renewal under active planning. • Maintenance, health and safety, and business continuity procedures are reviewed regularly. • Non-practical elements of the programme can move to online delivery in an emergency	Low No planned or anticipated change to premises. Lease renewal is a planned and managed process with no current indication of risk. The programme's performing arts nature means full online delivery is not a viable long-term substitute.
Loss of ability to recruit or support international students	• The ICMT does not currently hold a Student Route sponsor licence. International students enrol based on their own valid visa status (including youth mobility, spouse visas, and equivalent, where appropriate). • Admissions processes verify visa eligibility at the point of enrolment. • Students are made aware at the point of offer that the ICMT cannot sponsor Student Route visas. • The ICMT monitors the visa status of international students as part of its ongoing compliance activity.	Low The ICMT's current international students hold independent visas and are not dependent on the ICMT for visa sponsorship. The risk is that a change in a student's personal visa status mid-programme could affect their ability to continue studying. This is an individual-level risk rather than an institutional one, and is managed through admissions eligibility checks and ongoing monitoring.
Unable to recruit or teach a particular type of student	• Admissions processes are open and non-discriminatory, reviewed annually. • English language support available. • Reasonable adjustments in place for students with disabilities. • Equality, Diversity and Inclusion (EDI) policy governs all admissions and teaching activities.	Low: No anticipated change to ICMT's ability to recruit or teach any student group. The most plausible scenario is a change in immigration or visa policy affecting international applicants, which is addressed more directly in the Student Route row above.
Inability to deliver one or more courses or material components of a course	• Single programme with annual curriculum planning. • Small permanent faculty supported by visiting industry professionals. • Curriculum design distributes teaching responsibilities across the team to limit key-person dependency. • Contingency arrangements for staff absence documented and reviewed	Low to medium Under normal conditions, the ICMT delivers its programme reliably. However, because the teaching team is small and the programme is specialist, some dependence on individual staff members cannot be entirely avoided. If a key member of the teaching team were unavailable, this could affect delivery.

5. Risks Reasonably Likely to Crystallise and Mitigating Measures

Of the risks identified in section 4, two are rated Medium and one Low to Medium. This section sets out, for each of those risks, the specific measures the ICMT has in place and the steps it would take to protect students if the risk were to crystallise. Lower-rated risks are covered in section 4; should circumstances change and their likelihood increase, this plan will be updated accordingly. No course closures are planned or anticipated within the next three years.

5.1 Financial sustainability: Risk that the ICMT ceases to operate

Why this risk is elevated

The OfS raised concerns about financial sustainability with the ICMT. The ICMT is taking active steps to address those concerns, including a cost reduction programme and a review of its income strategy. The Governing Body monitors financial performance monthly and oversees a multi-year business plan. Notwithstanding these measures, the OfS's assessment means this risk cannot currently be rated Low, and this plan reflects that position honestly.

What ICMT would do if this risk crystallised

The Principal, Kenneth Avery-Clark, is responsible for implementing this plan. If the ICMT reached a point where cessation of operation became a real possibility, the following steps would be taken in sequence:

- The Board would convene an emergency meeting within 48 hours of any decision point being reached.
- The OfS would be notified immediately, in accordance with Condition C3(iii) of the OfS Regulatory Framework.
- All enrolled students would be contacted individually within 24 hours of the Governing Body's decision, with a clear explanation of the situation, what it means for them personally, and what ICMT will do next.
- A teach-out plan would be activated for students in the later stages of their programme, prioritising those closest to completion of their award. The ICMT's existing faculty would deliver the teach-out, supplemented by external appointments where necessary to maintain the quality and continuity of provision.
- For students who cannot be protected through teach-out, primarily those at an early stage of their programme, the ICMT would provide active transfer support, including assistance in identifying suitable alternative providers, supporting the transfer of academic credit, and providing references and documentation to facilitate admission elsewhere.
- Individual assessments would be conducted for all students with particular vulnerabilities, including students whose right to remain in the UK depends on their continued enrolment, students with disabilities, and students in financial hardship. Support would be tailored to individual circumstances.
- The refund and compensation policy would be activated for all affected students (see section 6).

Teach-out

The ICMT's first commitment is to enable every enrolled student to complete their studies. Where a teach-out is activated, the ICMT commits to maintaining the quality of provision throughout the teach-out period; staffing, facilities and programme content will not be reduced ahead of student need. Students

will not be disadvantaged in their assessment or progression as a result of the institution's circumstances.

Transfer

Where a teach-out is not possible, the ICMT will support affected students to transfer to another provider. The ICMT does not currently hold formal transfer agreements with other performing arts institutions; however, it will make direct contact with appropriate providers on behalf of affected students and will support each student individually in identifying the best available option for their circumstances. Students will not be left to navigate transfer alone.

Certification and exit awards

Students who are unable to complete their award, whether through teach-out or transfer, will receive a formal record of their academic achievement to the point of exit. This will include a transcript of credits achieved and, where applicable, an exit award. Academic records will be archived securely to ensure students can access evidence of their achievements in the future.

5.2 Validation transition: Risk that validated provision cannot be maintained

Why this risk is elevated

The ICMT's current validation arrangement with Coventry University has a defined end date. The ICMT is actively procuring a new validation partner, and the Governing Body oversees this process. Until a new arrangement is confirmed, there is a risk, rated Medium, that no new validator is in place when needed, which would prevent the ICMT from enrolling new students onto validated higher education provision.

The risk to currently enrolled students is lower. Coventry University has confirmed it will teach out the final cohort enrolled under the current arrangement, meaning those students' ability to complete their BA (Hons) Musical Theatre Performance award is protected regardless of what happens with the new validator procurement.

What ICMT would do if this risk crystallised

If a new validation partner is not confirmed within the required timeframe:

- Recruitment to new cohorts would be suspended immediately. The ICMT will not enrol students onto a provision that it cannot guarantee will lead to a validated award.
- All applicants holding offers would be contacted promptly, with a clear explanation of the situation and their options. The ICMT would support affected applicants to identify alternative provision.
- Currently enrolled students would be notified individually, with a clear explanation of how the Coventry teach-out arrangement protects their ability to complete their award.
- The ICMT would continue to pursue a new validation arrangement and would resume recruitment as soon as a new partner is confirmed and approved.

If the Coventry arrangement ended earlier than planned for any reason, whether due to a decision by Coventry or by ICMT, the same protections would apply to all enrolled students, and the refund and compensation policy would be activated for any student materially affected.

5.3 Course delivery: Risk of inability to deliver one or more courses or material components

Why this risk is noted

This risk is rated Low to Medium. Delivery is stable under normal operating conditions. It is included here because the small size of the ICMT's teaching team means that the loss of a key faculty member, through illness, departure, or other unforeseen circumstances, could affect the delivery of specific programme components. The final production, as a summative and professionally significant element of the programme, is identified as carrying particular impact if disrupted.

What ICMT would do if this risk crystallised

Where a component of the programme cannot be delivered as planned:

- Affected students would be notified promptly, with a clear explanation of what has changed and what ICMT proposes to do.
- The ICMT would explore all available options for alternative delivery, including visiting faculty, rescheduling, or an adjusted format, before concluding that a material change is unavoidable.
- Any material change to the programme would require the written agreement of all affected students before implementation. Where agreement cannot be reached, the ICMT would support any student who wished to withdraw, including activating the refund and compensation policy.
- Where the final production is affected, the ICMT would explore every reasonable option to preserve a public performance outcome for the graduating cohort. The professional significance of this component is understood and would be treated accordingly.

6. Refunds, Compensation and Other Remedies

The ICMT's first commitment is to preserve every student's ability to continue and complete their studies. Refunds and compensation are a last resort, applied only when continuation of study through teach-out or transfer cannot be achieved.

Where this plan is triggered, and continuation of study cannot be preserved, the ICMT will refund a proportion or all of the tuition fees paid by or on behalf of the affected student, and may make a payment in relation to any wasted or additional costs incurred as a direct result. The amount will be calculated in accordance with the principles of consumer and contract law. For example, if a student cannot continue mid-year and can only transfer to another provider from the start of the following academic year, the ICMT will refund any tuition fees paid for the period of study that cannot be delivered and will consider compensation for wasted maintenance costs during that period.

Refunds will be applied to all student groups. Students whose fees are funded in whole or in part by the Student Loans Company, students who pay their own tuition fees, and students whose fees are paid by a sponsor or employer are all covered. Refunds will be paid by the same method and to the same account as the original payment, in accordance with Money Laundering Regulations 2017.

Where a refund of tuition fees alone does not fully address the impact on a student, the ICMT will consider compensation for additional costs incurred as a direct result of the disruption. This includes additional travel costs for students affected by a change in the location of their course; compensation for maintenance costs and lost time when continuation of study cannot be maintained; and compensation for tuition and maintenance costs when a student has to transfer to another provider. Where a student

holds an ICMT bursary or scholarship, the ICMT will honour any entitlement due up to the point of disruption, with any remaining entitlement assessed on a case-by-case basis.

All refund and compensation payments will be made within 30 days of agreement that a payment is due.

Full details of ICMT's refund entitlements, liability tables, and withdrawal terms, including the specific liability percentages applicable to each course, are set out in the *Tuition Fee, Refund and Cancellation Policy*, published on the ICMT website. Students on the BA (Hons) Musical Theatre Performance should also be aware that Coventry University's Refund and Remedy Standard may apply in certain circumstances; details are available on the Coventry University website.

The ICMT's Governing Body will establish a dedicated student protection reserve within the current financial planning cycle, sufficient to fund an orderly teach-out or wind-down should that become necessary. The target amount and timeline will be confirmed during the current financial plan review, and the plan will be updated accordingly. In the interim, the Governing Body maintains direct oversight of the financial resources available to meet any refund and compensation obligations, and receives monthly management accounts for this purpose.

The protections in this plan are in addition to, and do not replace, students' rights under consumer protection law.

7. Communication, Review and Implementation

Publication and availability

This plan is published on the ICMT website and is available to all current and prospective students. A link to the plan is included in the material provided to applicants when they receive an offer of a place, and the plan is accessible through the student portal throughout a student's time at the ICMT. Staff are made aware of the plan and their responsibilities under it through internal communications and induction. This revised plan will replace the current version on the ICMT website upon approval by the OfS.

Student consultation and involvement

The ICMT involves students in the development and review of this plan. Current student representatives have been informally consulted during the development of this revision. Going forward, students will be involved in the annual review of the plan through the formal student representative system. The ICMT will consult with student representatives at each review cycle, and any proposed material changes will be incorporated before the revised plan is published. This plan has been equality impact assessed.

Annual review

This plan will be reviewed annually. The review will consider whether the risk assessment remains current, whether the mitigating measures remain practicable and effective, and whether any changes to the ICMT's circumstances require an update to the plan. The review will be completed by the Head of Operations, approved by the Principal, and presented to the Governing Body.

Where material changes to the ICMT's circumstances occur between annual reviews, including any significant change to the financial position, the validation arrangements, or the ICMT's regulatory status,

the plan will be revised promptly and resubmitted to the OfS as required. The validation transition, in particular, will trigger an interim review once a new validation partner is confirmed.

If this plan needs to be implemented

If this plan is triggered, Kenneth Avery-Clark, the Principal and CEO, is responsible for overall implementation. The following commitments apply in all scenarios:

- All enrolled students will be contacted individually by email within 24 hours of a trigger decision, with a clear explanation of what has happened, what it means for them personally, and what the ICMT will do next.
- Where circumstances allow, the ICMT will aim to give students at least six weeks' notice before any material change takes effect. Where an emergency requires faster action, students will be notified as quickly as possible and updated regularly as the situation develops.
- Each affected student will be assessed individually. The ICMT recognises that the impact of any disruption will differ depending on a student's year of study, personal circumstances, financial situation, and any protected characteristics. Support will be tailored accordingly.
- Students will be supported to take independent advice. Where the ICMT is implementing this plan, students will be signposted to independent sources of guidance, including Citizens Advice and, where relevant, legal advice services.
- An equality impact assessment will be conducted at the point this plan is triggered, to ensure that the needs of all student groups are considered fairly and equitably in the implementation of any measures.
- The OfS will be notified promptly of any event that requires implementation of this plan, in accordance with Condition C3(iii) of the OfS Regulatory Framework.

Staff awareness

The ICMT will ensure that all staff with responsibilities relevant to this plan, including teaching staff, student services, and administration, are aware of its contents and understand their role if it is implemented. The plan is included in staff induction materials, and any significant updates to it will be communicated to all relevant staff promptly.

8. Complaints and Independent Review

Students who have a concern about the content of this plan or the way in which ICMT has implemented its provisions should raise it through ICMT's Student Complaints Procedure, which is published on the ICMT website. ICMT will respond to all complaints promptly and fairly, and will seek to resolve concerns at the earliest opportunity.

If a student remains dissatisfied after completing ICMT's internal complaints process, they may escalate their complaint to the Office of the Independent Adjudicator for Higher Education (OIA). The OIA is an independent body established to review student complaints once internal procedures have been exhausted. Students who have received a Completion of Procedures letter from ICMT are eligible to submit a complaint to the OIA. Further information about the OIA scheme, eligibility, and how to submit a complaint is available at www.oiahe.org.uk.

Appendix A: Related Documents

The following documents are referenced in this plan or are directly relevant to its operation. All ICMT documents are published on the ICMT website unless otherwise stated.

Document	Relevance to this plan	Published by
Tuition Fee, Refund and Cancellation Policy	Sets out the full refund entitlements, fee liability tables, and withdrawal terms referenced in section 6	ICMT
Student Complaints Procedure	The internal complaints process referenced in section 8	ICMT
Programme Closure, Suspension and Changes Policy	Governs the process for closing or making material changes to a programme, referenced in section 5	ICMT
Student Contract	The contractual agreement between ICMT and enrolled students	ICMT
Equality, Diversity and Inclusion Policy	Governs admissions and teaching activity; referenced in section 4	ICMT
Coventry University Student Protection Plan	Coventry's own OfS-approved plan, which operates in parallel with this plan for students on the BA (Hons) Musical Theatre Performance, is available on the Coventry University website.	Coventry University
Coventry University Refund and Remedy Standard	May apply to BA students in certain circumstances; referenced in section 6; available on the Coventry University website	Coventry University
OfS Regulatory Framework	The regulatory framework under which this plan is required, specifically Condition C3, is available at www.officeforstudents.org.uk	Office for Students
Office of the Independent Adjudicator: Scheme Rules	Governs the external complaints escalation route referenced in section 8; available at www.oiahe.org.uk	Office of the Independent Adjudicator

Appendix B: Student Questions and Answers

This appendix answers the questions students are most likely to have about this plan. If your question is not answered here, contact Gary Wood, Head of Operations: gary@theicmt.com / 0207 253 3118.

What is this plan, and why does it exist?

This plan sets out what the ICMT will do to protect your studies if something goes wrong, for example, if the ICMT faced serious financial difficulties, or if our arrangement with Coventry University ended before a new validator was in place. All higher education providers registered with the Office for Students are required to have a plan like this. It is not a sign that something is about to go wrong; it is a requirement that every registered provider must meet.

Does this plan apply to me?

If you are enrolled on a course at the ICMT, yes. The plan covers you regardless of your year of study, course, or how you pay your fees. If you are temporarily interrupting your studies or completing a resit, you are still covered.

If you have accepted an offer but have not yet enrolled, you are not formally covered. However, if this plan were triggered, we would contact you promptly to explain what it means for your place and your options.

What would actually happen to me if this plan were triggered?

It depends on the scenario, but in every case, you will be contacted individually by email within 24 hours of any decision. You would receive a clear explanation of what has happened, what it means for you personally, and what the ICMT will do next.

The ICMT's first priority is always to enable you to complete your studies. Depending on the circumstances, this would mean either continuing your programme through a teach-out arrangement or supporting you to transfer to another provider. Refunds and compensation are considered only when neither option is possible.

What is a teach-out?

A teach-out means the ICMT continues to deliver your programme until you have completed your studies, even if the institution is closing or winding down its provision. If you are close to completing your degree, a teach-out is most likely. The ICMT commits to maintaining the quality of your programme throughout any teach-out period; your teaching, facilities, and assessment will not be reduced in quality.

What if I need to transfer to another provider?

If a teach-out is not possible, the ICMT will actively support you to find an alternative provider. We have established relationships within the performing arts education sector and will draw on those to identify suitable options. We will support you individually, helping you understand your options, providing references and documentation, and assisting with the transfer of your academic credit where possible. You will not be left to manage this on your own.

Would I get a refund?

If your studies are disrupted and you are unable to continue, you may be entitled to a refund of tuition fees. The amount will depend on how far through your programme you are at the point of disruption,

calculated in accordance with the liability table in the ICMT's *Tuition Fee, Refund and Cancellation Policy*. In straightforward terms, the earlier in the academic year the disruption occurs, the more of your fees will be refunded.

Refunds are paid by the same method as the original payment. Payments are made within 30 days of agreement.

What about compensation?

Where a refund of tuition fees alone does not cover your losses, the ICMT will consider compensation for additional costs you have incurred directly as a result of the disruption. This could include additional travel costs if your course location changes, maintenance costs if you lose academic time, or the cost of transferring to another provider. Each case is assessed individually.

What happens to my academic records if the ICMT closes?

Your academic records will be securely archived so that you can access evidence of your achievements in the future. If you have not completed your award, you will receive a formal record of the credits you have achieved to the point of exit, along with a transcript. These documents will support any application to transfer to another provider or to enter employment.

I am an international student. Does anything different apply to me?

The same protections apply to you as to all other students. However, the ICMT recognises that the impact of any disruption could be more severe for you, particularly if your ability to remain in the UK is connected to your enrolment. If this plan is triggered, you will be individually assessed and supported, and the ICMT will help you identify alternative provision and understand your immigration position.

What if I have a complaint about this plan or how it has been implemented?

Follow the ICMT's *Student Complaints Procedure*, published on the ICMT website. If you remain dissatisfied after completing that process, you can escalate your complaint to the Office of the Independent Adjudicator for Higher Education (OIA), an independent body that reviews complaints from higher education students once internal procedures have been exhausted. You will need a Completion of Procedures letter from the ICMT before you can approach the OIA. Further information is available at www.oiahe.org.uk.