

**NABA**

NUOVA ACCADEMIA  
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**STUDENT  
PROTECTION  
PLAN**  
LONDON  
A.Y. 2026/27

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## INTRODUCTION

Welcome to NABA London Ltd (registered in England and Wales with company number 16511367) (“NABA London”, “we”, “us”, or “our”) student protection plan for students (the “Plan”).

**NABA London is a wholly-owned subsidiary of Istituto Marangoni Limited ("IML"). NABA London operates under IML's student sponsor licence granted by UK Visas and Immigration ("UKVI").**

In common with all other registered higher education providers, IML is required to publish, maintain, and update a student protection plan as part of its registration with the Office for Students (OfS). NABA London has prepared this Plan separate from, but in accordance with, IML's student protection plan to ensure clarity and certainty for its students.

This Plan describes any potential risks to continuity of study, the measures in place to mitigate such risks, how NABA London communicates and reviews its Plan, where students can access its Refund and Compensation Policy, and how students can utilise its Complaints process.

The measures outlined in this Plan apply to all students on any of our programmes leading to a formal qualification with our awarding body, Regent's University London (“RUL”), upon successful completion of their course. These measures are in addition to the protection students have under consumer protection law in the United Kingdom and do not limit their statutory rights.

## POTENTIAL RISKS TO THE CONTINUATION OF STUDY FOR STUDENTS AND MEASURES IN PLACE TO MITIGATE THOSE RISKS

NABA London has identified the following potential risks to the continuation of study of its students and has put measures in place to mitigate those risks:

- A. Failure to meet required standards for UK Higher Education
- B. Termination of partnership with RUL
- C. Loss of the IML's UK Visas and Immigration Service (UKVI) sponsorship licence
- D. Financial instability, loss of building operations and/or estate
- E. Institutional Closure
- F. Failure to deliver NABA London's programmes

NABA London's Academic Board monitors its overall financial health, academic performance, student learning experience and academic standards to ensure the potential risks mentioned above remain minimal to allow students to continue their studies at NABA London.

### A. Failure to meet required standards for UK Higher Education

The likelihood that IML and subsequently NABA London may fail to meet required standards for UK higher education, including ongoing registration with the OfS, regulatory compliance or academic quality assurance standards is **low**.

Since 2019, IML has maintained compliance with all monitoring, assessment and data reporting requirements for its registration with the OfS. NABA London is obliged to comply with equivalent requirements. The likelihood that NABA London fails to meet the required standards is **low** as well.

The impact of IML losing OfS registration is assessed as **high**, as removal from the OfS register would mean that IML, and subsequently NABA London, and would not be able to sponsor international students while IML would also lose access to student funding.

## B. Termination of partnership with RUL

The risk that RUL is likely to terminate the partnership agreement with NABA London unilaterally is **low**, with both parties being strategically committed to the partnership following full due diligence reviews and approval from their respective governing bodies. This is because NABA London has a successful track record in maintaining academic standards, quality, and compliance with the requirements of awarding bodies within its previous and existing validation in Italy and has received outstanding feedback by RUL in the Course Validation and Partnership Approval phases, formalized in September 2025, within the entire Validation process.

In the unlikely event of this risk arising, both NABA London (as IML subsidiary) and IML itself have confirmed that the interest of students would remain paramount, and students would be allowed to complete the programme onto which they have enrolled at NABA London.

The terms of the partnership agreement provide a clear framework for any exit arrangements, including making provision for NABA London to terminate the agreement if RUL does not perform its obligations adequately. The partnership agreement includes a commitment from both parties to support student choice, where required during any ‘teach out’ period, which would usually be until enrolled students have completed their approved, validated programme.

As part of those exit arrangements, IML and RUL will also make sure to provide opportunities for students at NABA London to transfer to relevant programmes at other providers, as appropriate. Where applicable, NABA London will make sure to offer appropriate compensation for students who have suffered a material, financial loss as a result of any termination of a validation arrangement, in accordance with its Refund and Compensation Policy downloadable from <https://www.naba.it/en/london/regulatory-documentation>.

## C. Loss of IML's UKVI sponsorship licence

As noted above, NABA London operates under IML's UKVI sponsorship licence.

It is recognised that the impact of IML losing its UKVI sponsorship licence would be **high**, as NABA London would not be able to recruit international students without IML's licence.

Following IML's successful UKVI licence application in 2021, and subsequent renewal for [4] years in 2025, IML has an established track record of compliance with the terms of its UKVI sponsorship licence, including its monitoring and reporting requirements via the sponsorship management system. IML continues to maintain a low refusal rate and undertakes regular internal audits to ensure its record keeping is compliant with UKVI requirements.

In order to mitigate against any impact in response to the impact of EU students requiring student visas following Brexit, IML successfully obtained a significant increase in its overall CAS allocation to maintain student recruitment and preserve continuity of study for affected students and applicants.

In the unlikely event that IML is unable to offer student visa sponsorship for international students, it will work closely with UKVI to seek to ensure that its students are able to complete their current year of study at NABA London. NABA London will also seek to offer affected international students opportunities to transfer to the existing NABA Milan or NABA Rome or to alternative providers (for example providers within Galileo Global Education group, to which both IML and NABA London belong) and will offer appropriate compensation for students who have suffered a material, financial loss as a result in accordance with its Refund and Compensation Policy downloadable from <https://www.naba.it/en/london/regulatory-documentation>.

It is to be highlighted that NABA London programmes currently foreseen have been developed on the basis of the existing Italian programmes, validated by the Italian Ministry of Education (AFAM

programmes) offered both in NABA Milan and NABA Rome; therefore, it is expected that the overall student academic experience would remain very similar.

If IML's sponsorship licence is terminated when there are international applicants who have not yet started their programme, NABA London will contact them as soon as possible and offer a study suspension or transfer opportunity.

D. Financial instability, loss of building operations and/or estate

As noted above, NABA London is a wholly-owned subsidiary of IML.

IML's most recent financial accounts demonstrate that it is in a sound financial position and the OfS annual financial return demonstrates credible and prudent financial forecasts with ongoing financial health generating a sizable surplus each year. The financial surplus enables IML to maintain sizable reserves and reinvestment in its learning resources. IML carefully manages student forecasts and associated investment each year to enable sustainable and managed growth. The overall financial health of IML and its oversight of financial management and risk has also been independently verified through the independent, external financial audit undertaken each year.

NABA London is a newly established legal entity, created as a new School within the Galileo Global Education Group, of which IML is also a long-standing member operating in the UK for many years.

NABA London benefits from the financial strength, international expertise, and organizational support of the Galileo Global Education Group, which operates over 110 campuses in 20 countries and serves approximately 300,000 students worldwide. Within this framework, the NABA campuses in Milan and Rome — with more than 40 years of academic excellence — provide additional stability through consistently strong financial performance and a solid, growing cash-generation capacity.

This structure ensures that NABA London is founded on reliable economic fundamentals, long-term sustainability, and a high level of operational stability, despite being a newly formed entity.

The risk, therefore, that IML and subsequently NABA London will be unable to continue operations is **low**. The risk that NABA London will be required to close, or suspend delivery of, programmes is also deemed **low**.

The likelihood NABA London will no longer be able to deliver programmes at its Here East, Queen Elizabeth Olympic Park, 14 East Bay Lane, London E15 2GW site is deemed **low** due to length of tenancy (10 years).

The impact of loss of building operations, equipment, including IT equipment or loss of access to the site is considered to be **low**.

The NABA London campus is new and modern, and the institution is committed to continuing to invest in capital expenditure, equipment, and student-focused activities. The facilities have been designed to support projected student growth for at least the next five years, ensuring a stable and well-planned development path. Where students are impacted by the loss of access to the building, learning facilities or IT equipment, this will be dealt with in accordance with our internal arrangements and any mitigating adjustments that can be put in place on an individual basis.

Where students lose access to building, facilities, or IT equipment; or there is a major incident regarding loss of building, facilities, or IT system failure which may result in loss, this will be dealt with in accordance with our internal arrangements.

In the event of disruption caused by a major localised incident (such as flood or fire) or a major local, national, or global incident, NABA London will take appropriate steps to maintain continuity of study while also complying with all relevant government, legal and sector regulatory requirements.

If NABA London is unable to deliver programmes at our Here East, Queen Elizabeth Olympic Park, 14 East Bay Lane, London E15 2GW site, it would first seek to ensure that the building is not closed during the teaching period. In the case of any event outside of NABA London's control causing the temporary closure of all or part of its estate, NABA London will take reasonable steps to ensure continuity of face-to-face teaching for all students, including sponsored students, by securing temporary alternative teaching space within our premises, at IML premises, or at suitable external facilities and inform students in a timely manner.

Where limited remote teaching was required, this will only take place in accordance with the applicable UKVI Student Sponsor Guidance in force at the relevant time.

NABA London is confident of its ability to transition to alternative modes of delivery, drawing on NABA London and IML's experiences during the Covid-19 pandemic (2019-2021) which included putting in the necessary IT facilities in place for students, academic staff, and professional staff. Therefore, the risk of NABA London not being able to do so in the future is **low**.

NABA London will not deliver teaching in any format that would put the student sponsor licence at risk. Where compliant alternatives are not feasible, NABA London may consider short-term adjustments such as temporary suspension of studies (deferral) or alternative arrangements, ensuring students are supported throughout.

#### E. Institutional Closure

NABA London operates within established governance, financial oversight, and quality assurance arrangements, including oversight by IML, and its academic validation relationship with RUL. Institutional closure is considered highly unlikely and would only be contemplated as a measure of last resort.

In the unlikely event that NABA London is no longer able to deliver its programmes, the Academy would work with IML and RUL to take reasonable steps to protect students' interests and minimise disruption. This may include phased closure to enable completion of studies, alternative delivery or teach-out arrangements, or support for transfer to suitable programmes at IML or RUL. Where continuation or transfer is not possible, refunds and compensation will be provided in accordance with the Refund and Compensation Policy.

Students, applicants, validating partners, and relevant regulatory bodies would be informed as early as reasonably practicable, and no later than 10 working days following any formal decision. Appropriate academic, pastoral, and practical support would be provided throughout.

#### F. Failure to deliver NABA London's programmes

The risk that NABA London is unable to deliver specific programmes or pathways in the next three years, including the deployment of adequate expert staff or tutors within specific courses, is **very low** because NABA London has access to a wide range of academic staff with relevant professional currency and academic expertise.

NABA London also carefully monitors recruitment to target throughout the year and any decision to suspend or withdraw a programme will only be made well in advance of the start of the following academic year.

In the event of any decision to suspend recruitment or discontinue a programme entirely, any applicants would be informed at the earliest opportunity and in accordance with consumer protection law in the UK.

NABA London will provide opportunities for existing students or offer holders to transfer to other programmes awarded by RUL (at RUL or IML) or provide support to apply and enrol elsewhere including NABA Milan and NABA Rome.

Wherever possible, students enrolled on a programme that is to be discontinued will be given the opportunity to complete their studies under a teach out arrangement.

Alternatively, students will have the option of continuing their studies on one of our equivalent programmes or to transfer elsewhere, with same arrangements foreseen for applicants.

NABA London is committed to supporting all students to succeed and ensures to put in place appropriate measures for individual students in accordance with individual requirements.

The risk that it is unable to teach particular programmes or programme components to specific groups of students is therefore **low**.

Major and minor material changes to programmes would not normally take place in-year and would only apply to the next cohort of students. However, in response to local, national, or global incidents that may occur during the year, it may be necessary to make material changes to programme delivery in order to maintain continuity of study. In any case, students and applicants will be informed of any material changes in sufficient time, and where possible, in the applicant case, in their offer letter, to enable them to consider if they wish to change their choice of programme and/or withdraw their application at any stage in the admissions process.

Any students or applicants affected by a change to a programme may be eligible for compensation in accordance with the Refund and Compensation Policy downloadable from <https://www.naba.it/en/london/regulatory-documentation>.

NABA London is committed to recruiting, supporting, and maintaining a diverse student and staff population that is consistent with Galileo Global Education Group's international and global identity. Its commitment to retain its European student and staff population remains equally strong. To mitigate against a potential fall in student or staff recruitment, NABA London will adopt IML's clear strategy for ensuring that the terms of the EU settlement scheme were communicated and understood by eligible staff and students. Clear and accessible information for applicants and prospective applicants also ensures they understand what they need to do when applying to study in the UK. Applicants, prospective applicants, and students are supported and receive timely information and advice by the team as appropriate. NABA London is committed to ensuring that job applicants from the EU continue to be considered on their merit and receive information and support on what they need to do to qualify to work in the UK.

## **INFORMATION ABOUT REFUND AND COMPENSATION POLICY**

All students and prospective students can find our Refund and Compensation Policy at <https://www.naba.it/en/london/regulatory-documentation>.

## **COMMUNICATION**

NABA London publishes this Plan on its website, and it is uploaded on its student portal. All new students are made aware of the Plan when they accept their offer to study and when they re-enrol at the beginning of the academic year.

In advance of each new academic year, all staff will be made fully aware of this Plan and their responsibilities within it, particularly with regard to implications arising from proposed changes or modifications to validated programmes.

When NABA London needs to make material changes to a programme, NABA London will aim to keep the changes to the minimum necessary to achieve the required quality of experience. In any event,

NABA London will make sure to consult with and take reasonable steps to obtain the written consent of, students and applicants who have accepted an offer. NABA London will notify all affected students in writing not less than 30 days in advance, and all applicants either in their offer letter or as soon as possible after the offer letter has been sent, about any changes that are required. Any such changes will be undertaken in accordance with our Terms and Conditions and students may be entitled to a refund in accordance with our Refund and Compensation Policy which can be found at <https://www.naba.it/en/london/regulatory-documentation>.

Prospective students shall be contacted via the Enrolment Team, and enrolled students shall be contacted by the Registration and Student Services team, ensuring appropriate advice is provided so that all students can make informed decisions on the continuation of their studies in line with our student Terms and Conditions.

## **COMPLAINTS**

Students or applicants can raise a complaint using the Student Complaints Policy and the Admissions complaints and appeals policy and procedure available here: <https://www.naba.it/en/london/regulatory-documentation>

If having exhausted all stages of NABA London's internal complaints procedure, a student considers that NABA London has failed to consider and respond to their complaint appropriately, the student can refer their complaint to the awarding body (in respect of validated provision) and then to the Office of the Independent Adjudicator for Higher Education, which provides an independent scheme for the review of student complaints.

## **REVIEW AND COMMUNICATION OF THIS STUDENT PROTECTION PLAN**

NABA London reviews this Plan annually via the Academic Board and with IML, which finally approves it. Student representatives participate in the annual review, as well as the appointed Academic Student Governor.

If NABA London needs to implement the measures in this Plan, we will institute a dedicated hotline, email, FAQ and drop-in support service (including academic and professional service staff and independent advice) to support students collectively and individually. Alongside this, NABA London will seek to support student transfer arrangements as applicable (with our partners, other local UK Higher Education providers or internally, across the global network of Galileo Global Education Schools, in line with student choices).



**DOCUMENT REVISION**

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