

London School of Theology Student Protection Plan

Provider's Name: London School of Theology
Provider's UKPRN: 10004075
Legal address: Green Lane, Northwood, Middlesex HA6 2UW
Contact for enquiries: Academic Secretary, Director of Academic Support at the above address.

Risk assessment

Introduction

1. London School of Theology (LST) is one of the largest independent Christian theological colleges in Europe however it is a small provider in the context of universities in the higher education sector; the following data for 2017-2018 sets this statement in context:
 - Number of faculty: 19 FTE.
 - Number of administrative staff: 37 FTE.
 - Number of students: 516.
 - Turnover: £3.3m.
 - Total net assets: £11.6m.
2. For over 25 years, LST has delivered university accredited programmes in theology at undergraduate, postgraduate and research levels as well as non-accredited short courses. Since 2005, LST's accredited programmes have been validated by Middlesex University. While maintaining a focus on a core undergraduate BA (Hons) Theology degree, LST has successfully integrated this with other vocational disciplines through the provision of BA (Hons) programmes in Theology, Music & Worship; Theology & Worship and Theology & Counselling as well as Theological Studies.
3. At Masters level, LST's suite of postgraduate taught programmes (MA qualifications in Integrative Theology [MAiTH], Theological Education [MATE] and Aspects & Implications of Biblical Interpretation [MAAIBI]) provide progression routes for undergraduate students as well as postgraduate opportunities for students studying in a professional or vocational context. LST jointly offers postgraduate research programmes: MTh, MPhil and PhD in partnership with Middlesex University.
4. The majority of LST students' study on campus however a range of study modes are offered:
 - On-campus – face-to-face.
 - Online – with input from a tutor and from peers via the Virtual Learning Environment (VLE).
 - Distance learning – developed from the traditional 'correspondence course'.
 - Intensive – condensed on-campus delivery with the possibility of earning academic credit.
 - Blended – students studying through a combination of on-campus and on-line delivery.

Middlesex University validation

5. Since 2005 LST's accredited undergraduate programmes have been validated by Middlesex University with whom LST also offers joint postgraduate research programmes. This validation relationship is particularly important in the context of student protection arrangements at LST. In addition to being regulated by the Quality Assurance Agency, LST is closely monitored by Middlesex University which institution manages a programme of ongoing financial and quality due diligence so that Middlesex is aware, at all times, of the financial and quality standing of LST. Oversight of this process is through Middlesex University's Collaborations Sub-Committee. LST is required to submit an Annual Monitoring Report which Middlesex University use to assess a range of risks including those in relation to continuation of study for students. Middlesex University has appointed a Link Tutor to LST (University Link Tutor) who manages the relationship between the two institutions and who has oversight of the academic standards and quality of the collaborative programmes on a day-to-day basis. LST's Institutional Link Tutor is the Academic Secretary, Director of Academic Support.

London School of Theology Student Protection Plan

6. LST's agreement with Middlesex University includes contingency planning which identifies the arrangements that will be used should LST close or fail as a result of financial or other issues. This contingency planning is concerned with protecting the interests of students with the intention of putting in place arrangements that would allow students to complete identical or similar awards elsewhere.

LST risk management

7. LST has robust management and governance arrangements in place and specific arrangements in place for monitoring institutional risks including to continuation of study.
8. Culturally, LST is a risk averse institution; policies and processes that underpin risk management in relation to continuation of study include:
 - a. Complaints procedures that cover both academic and non-academic issues.
 - b. Student engagement in formal deliberative structures (Academic Board and Board of Trustees) as well as through informal engagements with the Principal and Executive Team members.
 - c. Student feedback mechanisms through module feedback and Programme Boards.
 - d. Robust budget setting and management processes as well as regular reporting to the Trustees through sub-committees of the Board of Trustees (Academic Affairs Committee and Finance & General Purposes Committee).
 - e. Consideration of a risk management matrix at each Finance & General Purposes Committee and Board of Trustees meeting which matrix considers the impact and likelihood of risks across the following areas:
 - i. Finance.
 - ii. Student recruitment.
 - iii. Compliance.
 - iv. Refurbishment (a current project).
 - v. Institutional mission.
9. In addition to the above, LST is bound by Middlesex University regulations regarding the approval of new programmes, amendment of programme content and discontinuation of programmes.
10. Although under review, LST currently considers its risks against the following measures:

Impact

- None.
- Think.
- Act.
- Warning bell.
- Very serious.

Likelihood

- Not likely.
- Possible.
- Reasonable.
- Very likely.
- Extremely likely.

11. This Student Protection Plan is written in the context of the above and is based on LST's current assessment of risk (June 2018).

London School of Theology Student Protection Plan

12. The following Table 1 sets out the risks that LST has identified in relation to continuation of study.

Table 1 – Continuation of study

<u>Risk</u>	<u>Likelihood</u>
Institutional risks:	
LST fails to meet student recruitment targets such that the overall viability and sustainability of the institution is impaired.	This risk would impact all students regardless of particular characteristics and may result in the closure of a module, programme or campus. LST considers this risk to be 'possible' given the contraction in the market for theological education.
Middlesex University withdraws validation of UG and PG programmes.	This risk would impact all students regardless of particular characteristics and may necessitate LST finding alternative validating arrangements.
GDPR (General Data Protection Regulations) compliance failure that may impact LST's overall viability and sustainability of the institution.	This risk would impact all students regardless of particular characteristics and may result in the closure of a module, programme or campus. LST considers this risk to be 'reasonable' given the significant operational changes and challenges that the new legislation requires for such a small organisation.
Research, teaching and learning:	
LST fails to maintain credible academic standards and so fails in its educational mission and duty to students.	This risk would impact all students regardless of particular characteristics and may result in the closure of a module, programme or campus. LST considers this risk to be 'possible' given the somewhat turbulent period that the new Principal and Executive Team is leading the institution out of.
Low morale and motivation of faculty and administrative staff.	This risk would impact all students regardless of particular characteristics and may result in a reduction in student satisfaction. LST considers this risk to be 'reasonable' and believes that it may result in a loss of faculty and administrative staff which may, in turn, result in a loss of institutional knowledge that is important to a small organisation.
Student satisfaction and performance:	
Failure of on-line BA (Hons) Theology programme to improve the student experience.	This risk would impact students studying through the on-line mode of delivery; this may well be mature students, students with a disability, students with caring responsibilities. This risk may well impact student continuation as well as progression and award. LST considers this risk to be 'reasonable'.

London School of Theology Student Protection Plan

<u>Risk</u>	<u>Likelihood</u>
Low morale and motivation of students.	This risk would impact those students who may find it difficult to stay engaged with higher education; in the case of LST, this may well be students who are not living on campus, mature students, students with family and caring responsibilities and students who need to work. LST considers this risk to be 'reasonable' because the study of theology can be challenging given the integration of person and subject.

Preserving students' continuation of study

13. The following Table 2 sets out the measures that LST has put in place to mitigate the risks described above. For the sake of completeness all risks have been included; those which are 'reasonable' risks have been highlighted.
14. Also included in the table below is a statement of the measures LST will put in place if the risks materialise and the mitigations are unsuccessful.

Table 2 – Mitigations and response

<u>Risk</u>	<u>Mitigations and Response</u>
Institutional risks:	
LST fails to meet student recruitment targets such that the overall viability and sustainability of the institution is impaired.	<p>LST considers this risk to be 'possible' and so has implemented additional reporting of progress against recruitment targets in this cycle. Additional resource has been allocated to support recruitment through a new Engagement Team set up for the purpose of leading on student engagement from the recruitment to the alumni phase.</p> <p>The Board of Trustees is engaged with this issue through reporting at the Finance & General Purposes Committee. Should the above steps not achieve the desired result then LST will review the budget for 2018-2019 in light of confirmed student numbers (at all levels) and take actions as appropriate to reduce expenditure and maximise other sources of income (such as through conferences and events).</p>
Middlesex University withdraws validation of UG and PG programmes.	LST considers this risk to be 'possible' although the institution has just been revalidated by Middlesex University and is entering into a Partnership Agreement for a further six-year period (June 2018 to 2024). Should Middlesex University wish to withdraw validation of LST's UG and PG programmes (prior to the end of the six-year contract) then Middlesex University is required to give LST 12-months-notice. This 12-month-period is considered by LST to be sufficient time to find and make arrangements with a new validating partner, if LST has not been successful in securing Degree Awarding Powers by this point.

London School of Theology Student Protection Plan

<u>Risk</u>	<u>Mitigations and Response</u>
<p>GDPR (General Data Protection Regulations) compliance failure that may impact LST's overall viability and sustainability of the institution.</p>	<p>LST considers this risk to be 'reasonable' and so has appointed a GDPR Project Team (led by the Director of Finance & Administration). Additional short-term staffing resources and funding have also been committed to ensure that GDPR compliance is achieved. External consultancy has also been engaged to provide expertise in this area. Should LST experience a compliance failure then LST would likely access its' reserves to pay any fines owing.</p>
<p>Research, teaching and learning:</p>	
<p>LST fails to maintain credible academic standards and so fails in its educational mission and duty to students.</p>	<p>LST considers this risk to be 'possible' and so the Executive Team is working with the Academic Board to be vigilant about academic standards. The Board of Trustees has set up a sub-committee – Academic Affairs Committee – the role of which is to strengthen capacity, raise standards and to report to the Board of Trustees on the present state and future of the educational mission of LST. The Academic Affairs Committee has already considered such issues as:</p> <ul style="list-style-type: none"> ▪ Faculty promotion and matrix procedure. ▪ Difficulties with the delivery of the BA (Hons) Theology through the on-line mode. ▪ Faculty representative reports. ▪ Academic Dean reports. ▪ Revised Terms of Reference for the Academic Board. ▪ Registration with the Office for Students. ▪ Research leave applications. <p>LST has recently received an annual monitoring visit report from QAA in which it is stated that LST is 'making acceptable progress' with continuing to monitor, review and enhance its higher education provision (June 2018). LST has also recently been revalidated as a partner by Middlesex University (June 2018). These recent events have raised the confidence of the institution however LST remains vigilant and committed to a programme of continuous enhancement (Appendix 030, Continuous Improvement Plan June 2018).</p>
<p>Low morale and motivation of faculty and administrative staff.</p>	<p>LST considers this risk to be 'reasonable' and so has implemented a number of initiatives:</p> <ul style="list-style-type: none"> ▪ Additional opportunities for communication through weekly faculty breakfast meetings. ▪ 'Faculty development days' for training and development purposes. ▪ The re-introduction of research-leave for faculty (following a gap of many years). ▪ The introduction of administrative staff lunches (monthly). ▪ The re-introduction of faculty and administrative staff salary increases following a period of austerity.

London School of Theology Student Protection Plan

Risk	Mitigations and Response
	<ul style="list-style-type: none"> ▪ The introduction of the Organisational Management Group – a joint faculty and staff committee which facilitates problem solving, decision making and communications across the institution. <p>LST is a small institution and so low morale is of concern; if the above interventions do not achieve the desired result then LST has included a number of further initiatives in the Strategic Plan 2019 (currently in development) which will be implemented:</p> <ul style="list-style-type: none"> ▪ An annual employee survey – to measure satisfaction. ▪ Work with an external consultant to design and deliver a range of interventions to infuse LST’s virtues in the community so that they may be deeply internalised, expressed and experienced. ▪ Review employee engagement mechanisms to ensure that the Executive Team is able to respond to issues of concern. ▪ A job grading system and a transparent salary scale.
<p>Student satisfaction and performance:</p>	
<p>Failure of on-line BA (Hons) Theology programme to improve the student experience.</p>	<p>LST considers this risk to be ‘reasonable’ and so have responded robustly as follows:</p> <ul style="list-style-type: none"> ▪ The Executive Team presented a report to the Academic Board in which it set out an action plan to address the issues identified in the report. A further report was written by a faculty member, as a result of which a sub-committee of the Academic Board was set up to consider the future of the programme. ▪ A further report was written in which was set out a number of immediate actions to address the challenges of the delivery mode; these actions included: <ul style="list-style-type: none"> ○ Reviewing admissions criteria and processes to ensure that students understand the demands of the programme and of studying on-line. ○ A review of enrolment processes and induction to ensure that students are equipped and supported to succeed from the beginning of the programme. ○ Consideration of the attendance requirements for on-line study. ○ Consideration of a proposal to introduce on-line student advisers to support students through their studies. ○ Consideration of a proposal to introduce interim assessment boards for students studying on-line.

London School of Theology Student Protection Plan

<u>Risk</u>	<u>Mitigations and Response</u>
	<p>It is considered highly unlikely that the above initiatives will not achieve the desired result. This matter is high on the institution's agenda and so LST will work tirelessly to ensure that the issues are addressed. Should LST be unable to mitigate the risk then consideration will need to be given as to whether to cease delivery through the on-line mode.</p>
Low morale and motivation of students.	<p>LST considers this risk to be 'reasonable' because the study of theology can be challenging given the integration of the person with the subject. Therefore, the following initiatives are being championed:</p> <ul style="list-style-type: none">▪ Increase in proactive engagement with the Student Committee.▪ Greater involvement of the Student Committee in planning for Freshers' Week.▪ Greater involvement of the Student Committee in planning for 2018-2019.▪ Encouraging of Student Representatives to contribute in Programme and Academic Board meetings, as well as providing training to enable them to do so. <p>Should the above not achieve the desired result then LST will collaborate with the Student Committee to co-create a joint plan of action.</p>

Compensation

15. Although a small provider in the HE sector, LST takes seriously its responsibility to ensure that students are completely satisfied with the education they receive and ensures there are multiple ways for students to feed back to the School any concerns they may have.
16. The student in the first instance should approach the relevant member of faculty to discuss any concerns they have with the delivery of a course, failing which each program has a designated Programme Administrator and Programme Leader the students can approach to discuss the matter. The school also has an established tutorial system through which feedback can be made. Should a student still not be satisfied with the responses received then LST has a number of documented student Academic Appeal Policies and procedures to turn to.
17. Depending on the circumstances, a refund of fees / maintenance related costs might be the appropriate course of action however this would be determined with due regard to how the fees had been paid in the first place:
 - a. If funded via student loan the school would work with the Student Loan Company to refund the fees directly to them via a change of fee notification.
 - b. If funded by the individuals the repayment will go back to them.
 - c. If funded by a sponsor the sponsor would be contacted to check how they would like to be refunded.
18. Where the solution offered is to deliver the course in a different venue, students would be compensated for any additional costs incurred travelling to the other location or if living onsite transport would be provided.

London School of Theology Student Protection Plan

19. If the solution accepted is to transfer the student to an alternative provider, then rather than refund the fees LST would pay them over to that alternative provider with any relevant scholarships / bursaries that the student had been awarded to ensure that the student was no worse off. Depending on the personal needs of each student the School would also consider awarding compensation for inconvenience / lost time.
20. To offset such costs arising from unforeseen factors impacting the ability of the School to deliver education, the School has business continuity insurance of £4.4m. Should the event not be covered by insurance the college is confident that its current level of reserves is more than adequate to cover any eventuality.
21. A copy of LST's Refund and Compensation Policy may be found on the School's website using the following link:

<http://lst.ac.uk/refundcompensationpolicy>

Student protection plan

Further information about LST's Student Protection Plan

22. LST will publish the Student Protection Plan in the following ways:
 - On LST's website – for current and potential students.
 - In Programme Handbooks and other course materials – for current students.
 - On the new LST Hub currently being developed for faculty, administrative staff and students.
23. LST's Student Protection Plan will be reviewed by the Academic Board on an annual basis. Student Representatives attend Academic Board and so will be involved in the process.
24. Should LST's Student Protection Plan need to be invoked then this will be undertaken in consultation with Middlesex University, as the validating partner, and in compliance with any requirements that Middlesex University may impose to ensure that the interests of students are protected. The following information provides important information in this respect:
 - a. Contingency plans agreed with Middlesex University are designed to allow students to complete identical or similar awards elsewhere by transferring to equivalent or identical programmes delivered through flying faculty or appointment of additional staff in local temporary premises.
 - b. Middlesex University will take the lead in managing the implementation of contingency plans. The LST Executive Team will work with Middlesex University to support the transition process for students as far as possible and External Examiners will be notified of any changes.
 - c. Communications to affected students will be undertaken as follows:
 - i. Students currently in the recruitment cycle will be notified as soon as possible by the LST Director of Communications & Engagement.
 - ii. Students already studying on a programme will be fully informed of any changes to programme management by Middlesex University. The minimum number of days' notice that will be given to a student in the event of a change to the course or course closure will be 10 working days.
 - d. Middlesex University staff will normally visit the LST campus to support transition arrangements. There is currently no provision for independent advice to be offered to students in the case of a change to course or course closure however support will be provided to students including a 1:1 meeting with the LST Programme Leader and 1:1 support from the Pastoral Support Team; this, for the purpose of enabling students to consider their options.