

London School of Theology - Student Protection Plan and Contingency Arrangements (SPPCA)

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1. This document sets out London School of Theology's (LST) Student Protection Plan and Contingency Arrangements (SPPCA). Designed in consultation with students, and considering their views, interests and needs, this SPPCA is published in the following ways:
 - a. On LST's website – accessible by applicants and students.
 - b. On LST's Student Hub – accessible by students.
2. The purpose of the SPPCA is to preserve the continuation and quality of study for LST students whenever a risk to the continued study of students crystallises.
3. LST's SPPCA is reviewed by the Executive Team and presented to the Board of Trustees and Academic Board for information. LST's SPPCA is submitted to Middlesex University as part of the ongoing monitoring process.
4. Related to this SPPCA are the following LST policies:
 - a. Student Transfer Policy: <https://lst.ac.uk/wp-content/uploads/2020/01/2.1.1f-APL-Credit-Transfer-Policy.pdf>.
 - b. Refund and Compensation Policy: <https://lst.ac.uk/wp-content/uploads/2022/01/LST-Refund-and-Compensation-Policy.docx>
5. This SPPCA is set out as follows:
 - a. **Risk Assessment:**
 - i. Introduction to LST
 - ii. Middlesex University – LST's Validating Partner
 - iii. Risk management at LST
 - iv. Risk Table
 - b. **Compensation:**
 - i. Compensation arrangements
 - ii. Business continuity insurance

Risk assessment

Introduction to LST

6. London School of Theology (LST) is one of the largest independent Christian theological colleges in Europe; however, it is a small provider when measured against other universities in the higher education sector. The following data (2021-2022) sets this statement in context:
 - a. Number of registered students: 522.
 - b. Number of active students: 436
 - c. Budgeted turnover: £3.34m
 - d. Total net assets: £12.8m
 - e. Number of employees: 64 (comprising 24 contracted faculty and 40 staff).
 - f. Number of visiting faculty: 82 (comprising 36 visiting lecturers; 5 first-study music tutors; 22 research supervisors and 19 distance learning supervisors).
7. 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.
8. At Masters level, LST's suite of postgraduate taught programmes (MA qualifications in Theological Studies [MATS] 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.

London School of Theology - Student Protection Plan and Contingency Arrangements (SPPCA)

9. The majority of LST's students study on campus; however, a range of study modes are offered:
 - a. On-campus: face-to-face.
 - b. Distance Education / Online: with input from a tutor and from peers via the Virtual Learning Environment (VLE).
 - c. Distance Learning: developed from the traditional 'correspondence course'.
 - d. Intensive: condensed on-campus delivery with the possibility of earning academic credit.
 - e. Blended: students studying through a combination of On-campus and Distance Education / On-line.

Middlesex University – LST's Validating Partner

10. LST's relationship with Middlesex University is particularly important in the context of student protection arrangements. LST is closely monitored by Middlesex University, which 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 through which Middlesex University assesses a range of risks including 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.
11. 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.
12. The contingency planning with Middlesex University provides for the following:
 - a. Should LST's SPPCA 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. Therefore, should any event(s) arise which require the SPPCA to be implemented then LST will notify the University Link Tutor in the first instance.
 - b. In accordance with the agreement between LST and Middlesex University, Middlesex University will take the lead in managing the implementation of contingency plans. Therefore, 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. Contingency plans allow students to complete identical or similar awards through Middlesex University by transferring to equivalent or identical programmes delivered through flying faculty or appointment of additional staff in local temporary premises.
 - d. Contingency plans will be fair and reasonable for students and will consider the diversity of students and their needs including such considerations as mobility, educational need, parity of course content or financial consequences.
 - e. 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 Finance & Administration.
 - 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.
 - f. Middlesex University staff will normally visit the LST campus to support transition arrangements. Middlesex University currently offers no independent advice to students in the case of a change to course or course closure; however support will be provided to students by LST including a 1:1 meeting with the LST Programme Leader and 1:1 support from the Pastoral Support and / or Registry Teams as appropriate.

Risk management at LST

13. LST has robust management and governance arrangements in place and specific arrangements in place for monitoring institutional risks including to continuation of study.
14. Culturally, LST is a risk averse institution; policies and processes that underpin risk management 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 Board of Trustees through sub-committees (including Academic Affairs Committee and Finance & General Purposes Committee).

London School of Theology - Student Protection Plan and Contingency Arrangements (SPPCA)

e. Annual consideration of a risk management matrix at the Finance & General Purposes Committee and Board of Trustees meeting.

15. 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.

16. LST currently considers its risks against the following measures:

Impact

1. None.
2. Think.
3. Act.
4. Warning bell.
5. Very serious.

Likelihood

1. Not likely.
2. Possible.
3. Reasonable.
4. Very likely.
5. Extremely likely.

17. This SPPCA is based on LST's current assessment of risk (January 2022) which, naturally, responds to the concerns and considerations of COVID-19.

Risk Table

18. The Risk Table below sets out the risks that LST has identified in relation to continuation of study and the mitigating actions; as stated above, each risk has been allocated an 'Impact' and 'Likelihood' rating.

19. Should any of the risks in the Risk Table crystallise, such that the continuation and quality of study for LST students is negatively impacted, then the arrangements set out at 12 above will be invoked.

20. A review of the Risk Table was undertaken in January 2022:

London School of Theology - Student Protection Plan and Contingency Arrangements (SPPCA)

<u>Risk and Impact</u>	<u>Likelihood</u>	<u>Mitigations</u>
<p>COVID-19: COVID-19 has the potential to impact LST negatively in multiple ways (Level 4/5 impact): COVID-19 could seriously incapacitate or cause the death of employees and students alike; infection rates could lead to further national or local lockdowns and the closure of the institution which would impact LST’s ability to deliver educational outcomes. Such a closure would impact institutional finances as accommodation charges are refunded. COVID-19 could also impact student finances and family situations which could cause students to defer or withdraw, and it could seriously impact recruitment as, for some students, Distance Education / Online delivery is not as attractive as On-campus delivery.</p> <p>COVID-19 risks would impact all students regardless of particular characteristics and may result in the closure of a module, programme or campus.</p>	<p>LST has fared extremely well during the COVID-19 crisis; further, with the vaccination programme and the Government approach, LST considers COVID-19 risks to be at Level 3/5 likelihood in the forthcoming year.</p>	<p>LST has mitigated the risks of COVID-19 by:</p> <ul style="list-style-type: none"> ▪ Moving teaching to online delivery as directed by Government but, recognising the importance of community and the role this plays in the student experience, keeping the campus open for the maximum time permitted. ▪ Following Government Guidance in keeping the campus a safe space for students, faculty, staff and visitors. ▪ Setting up a COVID-19 Task Force which meets weekly during times of heightened concern. ▪ Recruiting a COVID Marshall to oversee the implementation of all COVID policies and processes, particularly within the Student Body. ▪ Setting up a COVID-19 Testing Centre on-campus. ▪ Establishing a Student in Need Fund to help students overcome financial difficulties. ▪ Directing our Pastoral Care Team to reach out to all students on a regular basis. ▪ Keeping the spiritual life of the institution going as well as all the teaching and support functions.
<p>Finances: The following risks are of concern; all are at Level 3/5 impact:</p> <ul style="list-style-type: none"> ▪ Failure to achieve budget targets. ▪ Failure to deliver the institutional fundraising strategy. <p>Financial risks would impact all students regardless of particular characteristics and may result in the closure of a module, programme or campus.</p>	<p>LST considers these risks to be at Level 3/5 likelihood in the forthcoming year.</p>	<p>LST has mitigated the risks of financial failure by:</p> <ul style="list-style-type: none"> ▪ Continuing to undertake a monthly analysis of management accounts. ▪ Following the death of our Fundraising Manager from COVID-19, reviewing the institutional approach to fundraising and appointing a new Fundraising Manager.

London School of Theology - Student Protection Plan and Contingency Arrangements (SPPCA)

<u>Risk and Impact</u>	<u>Likelihood</u>	<u>Mitigations</u>
<p>Student numbers: The following risks are of concern:</p> <ul style="list-style-type: none"> ▪ Failure to achieve recruitment targets (Level 5/5 impact). ▪ Poor student retention and progression (Level 5/5 impact). ▪ Failure to appoint a strong Head of Marketing and Communications (Level 3/5 impact). <p>Student numbers' risks would impact all students regardless of particular characteristics and may result in the closure of a module, programme or campus.</p>	<p>LST considers these risks to be at Level 3/5 Likelihood in the forthcoming year.</p>	<p>LST has mitigated the risks of student numbers by:</p> <ul style="list-style-type: none"> ▪ Investing in undergraduate recruitment but recognising that student recruitment may take time to recover following COVID-19. ▪ Devoting resources to student engagement and implementing new processes to engage students with low / non-attendance. ▪ Reviewing the structure of the Communications Team and emphasising the need for focused marketing activities in a post to be recruited.
<p>Staff recruitment: The following risks are of concern:</p> <ul style="list-style-type: none"> • Failure to recruit new members of staff in a timely manner when vacancies arise. <p>Staff vacancies can impact the administration functions of the school with knock on effects to the efficient delivery of education.</p>	<p>LST considers these risks to be at Level 4/5 Likelihood in the forthcoming year</p>	<p>LST has mitigated the risks of staff recruitment challenges by:</p> <ul style="list-style-type: none"> • Introducing a staff referral programme. • For key posts appointing head-hunters to help fill the vacancies.
<p>Compliance: The following risks are of concern:</p> <ul style="list-style-type: none"> ▪ Failure to meet key compliance requirements (Level 4/5 impact). ▪ Failure to satisfy Office for Students that LST is financially sustainable (Level 4/5 impact). ▪ Data Protection Act 2018 compliance failure (Level 3/5 impact). ▪ Middlesex University withdrawing validation (Level 3/5 impact). <p>Compliance risks would impact all students regardless of particular characteristics and may result in the closure of a module, programme or campus.</p>	<p>These risks are considered to be level 2/5 likelihood.</p> <p>In respect of the risk that Middlesex University may withdraw its validation of LST, it is worth noting that LST's partnership arrangement with Middlesex University was revalidated recently and the two institutions have entered into a Partnership Agreement which does not expire until 2024. Should Middlesex University wish to withdraw validation of LST's UG and PGT programmes (prior to contract expiry) then Middlesex University is required to give 12 months-notice which is sufficient time to make alternative arrangements.</p>	<p>LST has mitigated compliance risks by:</p> <ul style="list-style-type: none"> ▪ Recruiting an experienced Registrar to lead the Registry Team. ▪ Continuing to invest in the post of Compliance & Reporting Officer. ▪ Embedding the new Student Information System to improve the quality of data used by the institution and provided to regulatory bodies. ▪ Implementing even tighter financial controls to ensure accurate and up-to-date data for forecasting, monitoring and financial management. ▪ Nurturing and strengthening LST's relationship with Middlesex University.
<p>Premises: The following risks are of concern:</p> <ul style="list-style-type: none"> ▪ Ensuring compliance with all health and safety requirements (Level 3/5 impact). 	<p>This risk is considered to be at Level 2/5 likelihood.</p>	<p>LST has mitigated the premises risk by:</p> <ul style="list-style-type: none"> ▪ Completing all fire risk and health and safety assessments and undertaking regular reviews. ▪ Accessing training materials and templates to better support the

London School of Theology - Student Protection Plan and Contingency Arrangements (SPPCA)

<u>Risk and Impact</u>	<u>Likelihood</u>	<u>Mitigations</u>
The premises risk would impact all on-campus students regardless of particular characteristics.		fulfilment of monitoring and management.
<p>Institutional Mission: The following risks are of concern:</p> <ul style="list-style-type: none"> ▪ LST fails to maintain credible academic standards and so fails in educational mission (Level 3/5 impact). ▪ Failure of Christian community (Level 3/5 impact). ▪ Scandalous behaviour by a member of the community (Level 3/5 impact). ▪ Poor staff morale and motivation (Level 3/5 impact). ▪ Poor student morale and motivation (Level 3/5 impact). <p>Missional risks would impact all students regardless of particular characteristics and may result in closure of a module, programme or campus.</p>	These risk are considered to be at Level 2/5 likelihood.	<p>LST has mitigated missional risks by:</p> <ul style="list-style-type: none"> ▪ Ensuring that the Academic Board, Programme Boards and Academic Affairs Committee remain vigilant about upholding academic standards. ▪ Continuing to devote resources to ensuring that LST devotes time to prayer, worship and pastoral support. ▪ Undertaking a re-envisioning process to better articulate mission and values as well as expectations of the Christian community. ▪ Undertaking staff satisfaction surveys and receiving / responding to regular reports from staff and faculty. ▪ Undertaking weekly meetings with the Student Committee.

Compensation

Compensation arrangements

21. 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:
- a. Through Programme Representatives (at each level) who report to Programme Boards.
 - b. Through the Student Academic Representative who reports to the Academic Board.
 - c. Through individual student feedback at module and programme level.
 - d. Through the Student Committee which engages with the Principal.
 - e. Through the School’s Tutor Groups.
 - f. Through policies including the Student Academic Complaint Policy & Process, Student Non-academic Complaints Procedure and Student Academic Appeal Policy & Process.
22. LST’s Refund and Compensation Policy is available to view on the institution’s website: <https://lst.ac.uk/wp-content/uploads/2022/01/LST-Refund-and-Compensation-Policy.docx>
23. In the case of interruption of studies resulting from inadequate lecturing or non-availability of suitable facilities, the following would apply:
- a. LST would initially seek to rectify any shortcoming by re-running the relevant programme, potentially with different lecturers or running the course in an alternative venue if there was a problem with the LST site, or in an extreme case asking a partner organisation to deliver the course.
 - b. Depending on the circumstances, a refund of fees / maintenance related costs might be the appropriate course of action in response to a student complaint or a particular student’s circumstances. Any refund would be determined with due regard to how the fees had been paid:

London School of Theology - Student Protection Plan and Contingency Arrangements (SPPCA)

- i. If funded via student loan, the School would work with the Student Loan Company to refund the fees directly to Student Loan Company via a change of fee notification.
- ii. If funded by the student direct, then the repayment will go back to the student.
- iii. If funded by a sponsor, the sponsor would be contacted to check how they would like to be refunded.
- c. Where the solution offered is to deliver the programme in a different venue, students would be compensated for any additional costs incurred travelling to the other location or if living on-campus, transport would be provided.
- d. If the solution accepted is to transfer the student to an alternative provider, then rather than refund the fees, LST would pay the fees over to that alternative provider with any relevant scholarships / bursaries that the student had been awarded, to ensure they are no worse off. Depending on the personal needs of each student, the School would also consider awarding compensation for inconvenience / lost time.

Business continuity insurance

24. To offset such costs arising from unforeseen factors impacting the ability of the School to deliver education, the School has business continuity insurance of £7m (maximum indemnity period of 24 months). Should the event not be covered by insurance the School is confident that its current level of reserves is more than adequate to cover any eventuality.