

## London School of Theology - Student Protection Plan and Contingency Arrangements (SPPCA) 2024

Process of ratification:	Academic Board, Executive Team
Executive Team Member Responsible:	ASDAS
Individual Responsible:	ASDAS
Last Approved by the Office for Students:	March 2024
Approval next required:	September 2025

**Provider's Name:** London School of Theology  
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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 & Employee Hub – accessible by staff and 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. Students are consulted on LST's SPPCA via their representation on the Academic Board and will be circulated to the Summer Programme Boards for student information.
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/2022/02/LST-Refund-and-Compensation-Policy.pdf>
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 (2023-2024) sets this statement in context:
  - a. Number of registered students: 442.
  - b. Number of active students: 308
  - c. Budgeted turnover: £2.95m
  - d. Total net assets: £10.6m
  - e. Number of employees: 73 (comprising 25 contracted faculty and 48 staff).
  - f. Number of visiting faculty: 80 (comprising 34 visiting lecturers; 6 first-study music tutors; 21 research supervisors and 19 distance learning supervisors).

7. For over 50 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 and Music, Theology and Creative Musicianship, Theology & Worship Studies and Theology & Counselling, as well as in Theological Studies.

At Masters level, LST's suite of postgraduate taught programmes (MA qualifications in Theological Studies [previously called Aspects & Implications of Biblical Interpretation] Biblical Studies and Practical Theology and Ministry, new for the 23/24 academic year) 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.

LST students study on a range of study modes:

- 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**

8. 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 Educational Monitoring and Enhancement 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 Services.
9. 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.
10. The contingency planning with Middlesex University provides for the following:
- a. Should LST's SPPCA need to be invoked 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, 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, 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 the 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 and/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 1 calendar month.
  - 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 Team for the purpose of enabling students to consider their options.

**Risk management at LST**

11. LST has robust management and governance arrangements in place and specific arrangements in place for monitoring institutional risks, including to continuation of study.
12. 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).
  - e. Consideration of a risk management matrix at each Finance & General Purposes Committee and Board of Trustees meeting.
13. 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.
14. 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.

15. This SPPCA is based on LST’s current assessment of risk in January 2024.

**Risk Table**

16. The Risk Table below sets out the risks that LST has identified in relation to continuation of study, and the mitigating actions that have been or would be applied to address such risks. As stated above, each risk has been allocated an ‘Impact’ and ‘Likelihood’ rating.

17. 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.

18. A review of the Risk Table was undertaken in January 2024:

<b><u>Risk and Impact</u></b>	<b><u>Likelihood</u></b>	<b><u>Mitigations</u></b>
<p><b>Finances:</b> The following risks are of concern; all are at Level 5/5 impact:</p> <ul style="list-style-type: none"> <li>▪ Failure to achieve a balanced budget .</li> <li>▪ Failure to achieve the institutional fundraising target.</li> </ul> <p>Financial risks would impact all students regardless of particular characteristics,</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 financial failure by:</p> <ul style="list-style-type: none"> <li>▪ Continuing to undertake a monthly analysis of management accounts.</li> <li>▪ Appointment of a new Fundraising Manager and reviewing the institutional approach to fundraising.</li> <li>▪ Consolidating Music programmes into 1 full time programme (Theology and Worship Studies) but</li> </ul>

<u>Risk and Impact</u>	<u>Likelihood</u>	<u>Mitigations</u>
and may result in the closure of a module, programme or campus.		ensuring a comprehensive teach out programme for current students.
<p><b>Student numbers:</b> The following risks are of concern:</p> <ul style="list-style-type: none"> <li>▪ Failure to achieve recruitment targets on all programmes (Level 4/5 impact).</li>   <li>▪ Poor student retention and progression (Level 4/5 impact).</li> <li>▪ The impact of the increase in cost-of-living crisis particularly in relation to student retention.</li> </ul> <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 4/5 Likelihood in the forthcoming year.</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"> <li>▪ Investing in undergraduate recruitment (by appointing a Marketing and Communications Manager) but also recognising that student recruitment may take time to recover following COVID-19 Increase student numbers by developing new programmes: MA in Practical Theology and Ministry was launched in 23/24. Plans for a new Liberal Arts pathway to the BA Theology in 23/24.</li> <li>▪ Launch of a new Fundraising campaign 80 for 80 to celebrate 80 years of LST.</li>   <li>▪ Devoting resources to student engagement and implementing new processes and policies (2 New policies: Attendance and Welfare Policy and a Fitness to Study Policies. An updated extenuating circumstance policy) to engage students with low / non-attendance.</li> <li>▪ Recruitment of a Learning Support Consultant in an advisory capacity to help implement the Access and Participation plan.</li> <li>▪ Creation of an Access and Participation Plan Steering group, which has undertaken a Level 3 Programme feasibility study, and which has recommended roll-out of such a programme from September 2025.</li> <li>▪ The successful launch of a learning skills-focused Summer school for students holding offers.</li> <li>▪ Implementation of an extended Study Skills programme in levels 4 and 5 in 2023/24.</li> <li>▪ Reviewing the structure of the Communications Team and emphasising the need for focused marketing activities in a post to be recruited.</li> <li>▪ Establishment of a Student in Need fund to quickly provide grants to those with a sudden financial need, which can’t wait for consideration at the next scheduled bimonthly bursary meeting.</li> </ul>
<p>Staff recruitment: The following risks are of concern:</p> <ul style="list-style-type: none"> <li>• Failure to recruit new members of staff in a timely manner when vacancies arise.</li> </ul> <p>Staff vacancies can impact the administrative functions of the school with knock-on effects for the efficient delivery of education.</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 staff recruitment challenges by:</p> <ul style="list-style-type: none"> <li>• For key posts, appointing head-hunters to help fill the vacancies.</li> <li>• The successful recruitment of 2 Programme Leaders for new programmes, and a lecturer in Worship and Creative Arts. Recruitment of 4 visiting lecturers.</li> <li>•</li> </ul>

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<u>Risk and Impact</u>	<u>Likelihood</u>	<u>Mitigations</u>
<p><b>Compliance:</b> The following risks are of concern:</p> <ul style="list-style-type: none"> <li>▪ Failure to meet key compliance requirements (Level 4/5 impact).</li> <li>▪ Failure to satisfy Office for Students that LST is financially sustainable (Level 4/5 impact).</li> <li>▪ Data Protection Act 2018 compliance failure (Level 3/5 impact).</li> <li>▪ Middlesex University withdrawing validation (Level 5/5 impact).</li> </ul> <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 3/5 likelihood.</p>	<p>LST has mitigated compliance risks by:</p> <ul style="list-style-type: none"> <li>▪ Recruitment of a new Compliance &amp; Reporting Officer.</li> <li>▪ Embedding the new Student Information System to improve the quality of data used by the institution and provided to regulatory bodies.</li> <li>▪ Implementing even tighter financial controls to ensure accurate and up-to-date data for forecasting, monitoring and financial management.</li> <li>▪ Nurturing and strengthening LST's relationship with Middlesex University.</li> </ul>
<p><b>Premises:</b> The following risks are of concern:</p> <ul style="list-style-type: none"> <li>▪ Ensuring compliance with all health and safety requirements (Level 3/5 impact).</li> </ul> <p>The premises risk would impact all on-campus students regardless of particular characteristics.</p>	<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"> <li>▪ Completing all fire risk and health and safety assessments and undertaking regular reviews.</li> <li>▪ Accessing training materials and templates to better support the fulfilment of monitoring and management.</li> </ul>
<p><b>Institutional Mission:</b> The following risks are of concern:</p> <ul style="list-style-type: none"> <li>▪ LST fails to maintain credible academic standards and so fails in educational mission (Level 3/5 impact).</li> <li>▪ Failure of Christian community (Level 3/5 impact).</li> <li>▪ Scandalous behaviour by a member of the community (Level 3/5 impact).</li> <li>▪ Poor staff morale and motivation (Level 3/5 impact).</li> <li>▪ Poor student morale and motivation (Level 3/5 impact).</li> </ul> <p>Missional risks would impact all students regardless of particular characteristics, and may result in closure of a module, programme or the campus.</p>	<p>These risks are considered to be at Level 2/5 likelihood.</p>	<p>LST has mitigated missional risks by:</p> <ul style="list-style-type: none"> <li>▪ Ensuring that the Academic Board, Programme Boards and Academic Affairs Committee remain vigilant about upholding academic standards.</li> <li>▪ Continuing to devote resources to ensuring that LST devotes time to prayer, worship and pastoral support.</li> <li>▪ Implementing the new Strategic Plan 2022-2028 which better articulates LST's mission and values as well as expectations of the Christian community.</li> <li>▪ Undertaking staff satisfaction surveys and receiving / responding to regular reports from staff and faculty.</li> <li>▪ The implementation of a mandatory, online Safeguarding training for all key personnel.</li> <li>▪ Undertaking weekly meetings with the Student Committee.</li> </ul>

### Compensation

#### Compensation arrangements

19. 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.

20. LST's Refund and Compensation Policy is available to view on the institution's website: <https://lst.ac.uk/our-policies/>

21. 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:
  - 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, the repayment would 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 by 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**

22. To offset such costs arising from unforeseen factors impacting the ability of the School to deliver education, the School has business continuity insurance of £5.7m (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.