



Student Protection Plan: The Queen's Foundation 2018-19

Provider's name: The Queen's Foundation for Ecumenical Theological Education

Provider's UKPRN: 10032282

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The aim of this Student Protection Plan is to lay out a risk assessment of the factors that impact upon the ongoing delivery of a student's programme of study. It similarly sets out the actions that the Foundation will take in the event of a material change in circumstances (such as a major incident) to protect the student interest, and to ensure that students are able to complete their programmes.

In so doing, the Foundation will work together with the student's validating university, their sponsoring church (if applicable), and other external bodies to ensure that students are able to achieve the best possible outcomes. The Plan has been designed to meet the requirements for registration with the Office for Students and should be read in conjunction with the Foundation's Refunds & Compensation Policy.

➤ Risk Assessment

The Finance and General Purposes committee of the Governing Body (F&GP) review and set the Foundation's risk register annually, alongside the annual budget setting process. The decision-making process of the Leadership Team operates within the parameters of this register.

Our overall assessment of the risk for the continuation of study for our students is **low**. The process for arriving at this assessment, and the mitigating processes which accompany it, are set forth as follows:

➤ Financial Risk & Recruitment

The risk that the Foundation as a whole is unable to operate is very low. This is due to the following reasons, and their associated mitigating factors:

- The majority of the Foundation's students come with sponsorship for their training from their sending churches. This funding covers the student's academic tuition fees, additional fees for professional training requirements, and maintenance for living costs; these are all assessed, as appropriate, for the student's particular situation/needs. This sponsorship covers 87.5% of our current student population, and for the Methodist church, Queen's is the sole approved training provider for ordained ministry. This ensures a regular flow of income that is proportionate to, and commensurate with, the delivery of the Foundation's activities.
- The Governors have a policy of retaining 12 months operating costs in protected reserves. This ensures that Governors would always be able to fully reimburse all students for services for which they had paid for that year, if the students wished or



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needed to be transferred to another institution, or if it were deemed necessary to fund a full teach-out of all existing commitments to students at the Foundation. This situation is further secured by our funding arrangements i.e. for the majority of our students, we would continue to receive tuition and maintenance fee income from our sponsors for those students participating in a teach out programme where the Governors had made a previous decision to cease admissions.

Because of the potential impact on a student's family, on their partner's local employment/commitments, on children in local schools,¹ on their agreements with local churches as part of their formational study and in view of the relatively short duration of study,² it is the policy of the Governors of the Foundation that, in the extremely unlikely event of the need to close the Foundation, they will offer a full teach out locally of all affected programmes.

The realistic financial risks are therefore limited to:

- *Reduction in Anglican candidates choosing to study at the Foundation* (where there is a choice of training provider). However, this is further mitigated by contracts we have with one local diocese as their preferred provider for all forms of training, and separate arrangements with another diocese to be the sole provider of training for Reader ministry.³
- *Loss of the Methodist training contract.* This is mitigated by our having at least one academic year's notice of its removal, and the further commitment to continue to fund and approve the training of all Methodist students who had begun their training/study with the Foundation, until the full teach out of those students is achieved. The impact of this change could therefore be both planned for and mitigated accordingly.

The outcome of either of these scenarios would be the planned redundancy of a proportionate number of faculty; however, the impact of this would not be on *existing* students. We have a broad range of faculty for our size, and reductions could be taken to maintain the current spread of specialisms.

A related risk to these eventualities is a non-viable cohort on one of our designated pathways. Because students are sent by a number of churches, however, this is a low risk. For its *overall* function, the Foundation is not dependent on the relationship with one particular sponsoring church. This is further mitigated by the Methodist contract meaning that a viable cohort exists in all main pathways prior to other recruitment. In the event of the loss of the Methodist contract, and/or exceptionally low recruitment of Methodist candidates, due to the cycle of Methodist candidating processes, this would be flagged at least 18 months in advance, and allow us to set a minimum viable cohort size for other students, and thereby make this clear as part of their admission process.

➤ Financial Risk & Campus/Site

Edgbaston site:

¹ The average age of The Foundation's students is 45; they therefore have partners, children, and other related family/personal responsibilities. Many families live on site, and therefore partners and children have changed employment and schools to allow the student to study at the Foundation.

² Most students need to complete a Certificate in Higher Education or a Diploma in Higher Education only in order to meet sponsorship requirements.

³ Reader Ministry is non-ordained, lay ministry normally done on a non-stipendiary basis.



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The lease on our present Edgbaston site lasts until 2062. The land and buildings are owned by Calthorpe Estates, and are leased to us at a peppercorn annual rent that has been in place for over 100 years.

The risks regarding this relate to securing another site, or paying an increased rent, once the present lease expires. We note, though, that Governors' reserves are comprised of assets that are not formally tied to the campus property, and therefore plans discussed below to teach students out in various scenarios relate to assets that are accessible and realisable whilst the teaching site can continue to function.

Shallowford site:

Our other teaching site at Shallowford House is owned by the Diocese of Lichfield. The Foundation uses the centre as part of our contract to deliver training for their diocesan sponsored students. Were this site to be closed or incapacitated:

- Students could transfer to teaching at Edgbaston: for many Shallowford students, the Edgbaston campus is in fact just as accessible/convenient, and there would therefore be minimal impact upon them. Their sponsoring diocese reimburses students studying at Shallowford for their travel expenses, and this would continue to cover travel to Edgbaston were the switch necessary.
- Further to that, we would consider individual circumstances, and, if the time taken for travel were not possible for particular students, then an alternative venue in Staffordshire would need to be located by the Foundation. We have contacts with a number of conference/ teaching venues in the region that we have used for other one-off teaching events, and would seek a suitable contract/location accordingly.

➤ **Financial Risk & University Validation**

The risk of removal of university validation is low, due to the development and operation of our arrangement with Durham University Common Awards.⁴ The contract for ministerial training in Great Britain that commenced in September 2014 is due to be renewed for another 5 years in September 2019, and our institutional validation would continue to be operative within those arrangements.

In the unlikely event of the removal of validation, however, universities taking the strategic decision to stop their existing validation arrangements is something that we have experience of in recent years and have responded to successfully by:

- Alerting all affected students to the end of the validating arrangements and their options for being taught out under their existing university regulations and programmes, or transferring to a new appropriate offer that we had negotiated with a different validating partner.
- Negotiating a fresh validation relationship with some new institutions and securing transitional arrangements for existing students.
- Taking the strategic decision to implement new validation arrangements only with new students, allowing time for teach out of old arrangements, and for faculty to

⁴ <https://www.dur.ac.uk/common.awards/>



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develop new modules and teaching materials year on year, ensuring academic quality.

- During the transition years, ensuring each student has access to bespoke academic advice and handbooks following their specific regulations.

We believe we have been successful in managing such transitions, as evidenced by the recent comment in our QAA annual monitoring visit report,⁵ and by the decision of Newman University to further validate our undergraduate programmes for 5 years to allow the comprehensive teach out of that programme. Their feedback on the revalidation of our teach out arrangements and the student consultation which it comprised was very positive.⁶

➤ Strategic Risk

As we only teach one core discipline (Theology), our capacity to resource the teaching of that discipline is low risk. Furthermore, most faculty members teach across several theological sub-disciplines and this reinforces our capacity to robustly resource our curricula and respond to sabbatical cover and other absences.

Areas where we identify a more significant risk include:

- *Change of Principal*: this is mitigated by an extensive exit procedure accompanied by a lengthy period available to recruit and enact handover. The sponsoring churches would be integrally involved with such an appointment, and this would ensure that the interests of the institution's ecumenical mission and ethos were protected.
- *Not recruiting to an advertised post that requires a very specific subject specialism or skill set*: In the unlikely event of this happening, we would seek to make an alternative associate appointment to cover that teaching area, or alternatively, arrange for students to take the corresponding module at an alternative Common Awards institution (and therefore still gain academic credit from Durham University towards their programme). In the very unlikely event that alternative arrangements prove to be ultimately impossible to deliver, then we would seek to amend the curriculum to incorporate an alternative module.

Measures within the enactment of the Student Protection Plan

We have described above the local and internal measures that we would take, or where we already have a track record of having taken, in the event of there being a risk to the delivery of a course or programme. We set out below the arrangements we would make with external bodies to safeguard the commitment made to all students.

Our governing body policy on reserves means that the Foundation would always have appropriate resources to teach out all programmes and fulfil all commitments, were the Governors ever to take the decision to close the institution.

⁵<http://www.qaa.ac.uk/en/ReviewsAndReports/Documents/The%20Queen's%20Foundation%20for%200Ecumenical%20Theological%20Education/The-Queen's-Foundation-for-Ecumenical-Theological-Education-EO-AM-18.pdf> (section 8)

⁶ Newman University BA Revalidation Minutes



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In the unlikely event of an unplanned closure (e.g. fire), the following mechanisms are in place:

- The Common Awards validation arrangement is shared curriculum which has been designed and approved by the sponsoring churches and validated by Durham University for all ministerial candidates in England. Within the confines of professional requirements and the QAA Theology and Religious Studies subject benchmark statement, the curriculum is broad, and allows each Theological Educational Institution (TEI) to design a curriculum that is appropriate to their context and specialism. Already embedded within the validation arrangements is the capacity for a student to take modules at another TEI and for students to transfer to another TEI to continue a programme without this involving formal accreditation of prior learning (APL). As such, all students on a Common Awards programme (approximately 80 % of the population) have realistic and numerous options to transfer and continue study without danger to either academic or professional award.⁷
- For students following programmes validated by Newman University we would seek either to transfer them to another TEI with an accompanying credit transfer process (APL); or, if it were in the student's best interests to transfer them to a Newman University Programme in order to finish their Newman University award.⁸ In the event of loss of campus then staff would be deployed to the partners university to facilitate this process.
- For our research students we would transfer students fully to the oversight of VU Amsterdam and their faculty. This confirms their existing registration as full students of VU Amsterdam.
- For not for university credit students, we would seek an alternative location in order to meet our commitments to complete their training and preparation for ministry.
- Queen's already has experience of students transferring in from another TEI (through our curates programme), with minimal impact on the student and their studies. This mitigates against the impact on Queens of another TEI closing and the expectation to receive transferred students. The Queen's Foundation has offered the following arrangements to other TEIs, and it is anticipated that they would be reciprocated were Queen's to close:
 - That the student could transfer onto a similar programme that Queen's already offers, in order to facilitate completion of the course in a meaningful way, and to meet the sponsoring churches' requirements along with those of the validating university.
 - That the student is able to move to, and to commit to the teach out, in Birmingham, or to follow the part time route with a commitment at weekends and one evening per week.

⁷ There are 18 approved Common Awards TEIs all over the country. See: <https://www.dur.ac.uk/common.awards/regulations/>

⁸ Newman University has a Theology Faculty, is in Birmingham and located approximately 4 miles from Queen's Edgbaston Campus.



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- That the other TEI's Student Protection Plan includes transfer of tuition fees/maintenance fees to the Foundation in respect of the remainder of the course that has not been delivered.
 - That the sponsoring church/diocese has been fully informed by the other TEI and has agreed the transfer.
 - That Durham University has been informed of the transfer, plus any associated request for suspension to facilitate the move (e.g. for accommodation and any necessary elongation of the permitted period of study).
 - That the other TEI would obtain the student's consent for sharing information with the Foundation when negotiating such a transfer, and would facilitate the transfer of academic and formational records and be able to respond to queries and clarification after the transfer has taken place.
 - That the other TEI would take responsibility for any compensation owed to the student and for complaint to the OIA arising from the student, as a result of the need for the transfer, and that this would be taken account of in the other TEI's student protection plan.
 - That a transfer mid-year would mean accommodation on campus could not be guaranteed but the Foundation would do all feasible to assist with alternative reasonable arrangements in this regard.
- Whilst Methodist sponsored students follow the Common Awards programme, and would be covered by such an agreement to complete work for academic credit and associated award, as the only approved TEI for Methodist ministerial students, additional arrangements would need to be made including the following:
 - Deployment of Foundation Methodist staff to TEIs receiving Methodist candidates to ensure the completion of professional training requirements in the new context.
 - Making available Foundation library and Moodle learning resources to transferring institutions.
 - Provision of specific Methodist related modules for onsite delivery for students who chose not to transfer and who need to be taught out on the Edgbaston campus.

Implications for Refund and Compensation

The student protection plan should be read alongside the Student Compensation and Refund Policy for 2018-19, which addresses the following scenarios:

- Refunds for students in receipt of tuitions fee loan from the Student Loans Company (*section 3c*)
- Refunds for students who pay their own tuition fees (*section 3b*)
- Refunds for students whose tuition fees are paid by a sponsor (*section 3a*).
- The payment of additional travel costs for students affected by a change in the location of their course (*section 4*).
- Commitments to honour student bursaries (*section 7*).
- Compensation for maintenance costs and lost time where it is not possible to preserve continuation of study (*section 3a-3c*).



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- Compensation for tuition and maintenance costs where students have to transfer courses or provider (3a-3c).

Overall, we have cash reserves of approximately £2,000,000. This would be sufficient to provide refunds and compensation for all/any students for whom we have identified a risk to their continuation of study.

Communications in respect of the Student Protection Plan

The Student Protection Plan for 2018-19 has been taken to the Academic Quality and Standards Group and from there to the Academic Management Group in May 2018. Both of these bodies contain student representation.

In parallel, it has been scrutinised by the Staff Student Community Forum (SSCF) with particular reference to its impact on student partners, children and other family members, especially those living on campus. The SSCF is made up of a majority of students and partner representatives and is co-chaired by a student representative.

The SSCF will be the responsible body for reviewing and developing the Student Protection Plan, and they will do so on at least an annual basis, in consultation with the Leadership Team, to ensure that risks remain current and mitigations feasible in the light of changing circumstances.

Once amended and approved, the plan will be published on our website in the student policy area,⁹ and all students will be notified of this new addition via our internal email mechanisms. New students will receive directions to a copy of it when they receive their Letter of Agreement for commencing studies in September 2018.

We will ensure that staff are aware of the implications of our Student Protection Plan when they propose course changes by including training on the plan and its associated principles on an annual basis, beginning in July 2018.

Implementation of the Student Protection Plan

Should the Student Protection Plan need to be implemented (because one of the risks has crystallized), the following actions will be taken by the Foundation:

- An action plan will be drawn up by the Leadership Team, the details of which will be determined by the nature of the problem, and informed by the Foundation's Strategic Plan. As circumstances allow, the SSCF will be fully involved in discussion around the implementation of the action plan and communication of any required actions as appropriate.
- Depending on the nature of the situation, individual students will be supported and advised by their personal tutors and centre directors. Where traumatic events have taken place, the Well Being Officer and Chaplain will work with students, personal tutors and other members of Faculty to provide additional support.

⁹ <http://www.queens.ac.uk/study/student-policies>



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- With respect to the Foundation College closure, students will be informed as soon as possible: in line with the Foundation's reserves policy, twelve months' notice will be given as an absolute minimum.
- With respect to removal of university validation, students will be informed of the situation as early as possible in line with the Foundation's agreements with the University and the sponsoring Churches.
- Students who wish to make a complaint about the way in which the Plan has been implemented will be encouraged to follow the Foundation's normal Complaints or Grievance Procedures; depending on the precise nature of the complaint, students may also have recourse to the complaints procedures of the University and the Office of the Independent Adjudicator once all internal procedures have been exhausted.