

Annex D: Template for a student protection plan

Provider's name: Luther King House Educational Trust

Provider's UKPRN: 10009612

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Student protection plan for the period 2018-19

1. An assessment of the range of risks to the continuation of study for your students, how those risks may differ based on your students' needs, characteristics and circumstances, and the likelihood that those risks will crystallise

Luther King House (LKH) is a well-established institution that traces its history back to the nineteenth century and the founding of the University of Manchester. It has successfully provided HE programmes at all levels on its current site since it became an ecumenical trust in 2000.

Finance

The risk that LKH will be unable to operate for financial reasons is considered low. This is for three main reasons:

- LKH has an established record of financial sustainability over many years, successfully operating a balanced budget according to the requirements of its constituent colleges. It has no exposure to price risk, credit risk, liquidity risk and cash flow risks.
- The educational work of the Trust is supported financially by its business subsidiary. Plans are in place to continue to maintain the strength of the business.
- The educational work is underwritten by the LKH constituent colleges, their staff and their respective church denominations. Loans are available should LKH experience a sudden and unexpected downturn in its income.

Risks are thus spread and shared, and careful financial oversight by the Finance Officer, reporting regularly to the Management Committee and Finance Monitoring Committee, ensures that any threats can be addressed immediately. Reserves to cover running costs for three months are available.

Current Validation

The University of Manchester (UoM) has indicated that it will not be possible to accept new students on to our currently validated programmes after the academic year 2019-20. However, the risk that LKH will be unable to deliver its advertised academic programmes to current students and those admitted up to and including 2019-20 is considered low for the following reasons:

- Within the exit plan currently being agreed, the UoM has affirmed that it will put in place a formal validation contact to extend from December 2018 (date of the expiry of the current contract) to the completion of all programmes.
- The UoM has affirmed that students admitted to UoM awards will be able to study to graduate with a UoM award, subject to the applicable UoM degree regulations. As and when appropriate, UoM representatives will meet with LKH students on UoM validated provision to reassure them that this is so.
- All current support structures involving LKH and the UoM remain in place to ensure the continuing quality and improvement of academic provision.

Future Validation

With the ending of validation of the LKH programmes of study by the UoM in 2020, the Board recognises the need to make alternative arrangements to secure the continuing viability of the LKH educational programmes. The decision has been made not to seek Taught Degree Awarding Powers but to explore opportunities for alternative validated provision. This presents a medium to low risk for the future, and the basis for this judgement is as follows:

- The Board is already actively engaged in the search for a new validating partner. The needs and requirements have already been identified, and a short list of three institutions has been approached. The work involved is thus already well advanced and it is possible to carry out this work within a generous timescale.
- LKH has been offered the support and help of the UoM in the search for an alternative validating partner, and has already received the advice and help of similar institutions with whom there are close relationships. LKH has also had experience of alternative validating partners in the past.

- The loss of income that would result from a failure to secure alternative validated provision has been identified as a risk. The financial structures referred to above ensure that such a loss could be managed, thus preventing any adverse effect on current students, though it is recognised that the long-term nature and purpose of the college would need to be re-examined.

Delivery locations

LKH delivers almost all its teaching from one site in Manchester. The risk of this site ceasing to be available is considered very low as it is fully owned and managed by the LKH Educational Trust. The only circumstances in which this site became unavailable for use would be if LKH made the decision to cease to engage in educational work.

A small amount of postgraduate teaching currently takes place at one of the constituent colleges in Sheffield. The possibility of this site closing for teaching is considered medium to high. This risk is mitigated by the following factors:

- The amount of teaching taking place in Sheffield is limited to two modules in the current year and arrangements are in hand for these to be delivered as necessary at the LKH site in future.
- All students admitted to the course expect to attend LKH for their teaching.
- All the course and student administrative work already takes place at LKH.

Course Closure

LKH is a small specialist institution, delivering degrees in contextual theology only, in response to the requirements of the main free church denominations in this country. There is no intention to diversify. Thus, its focus is very concentrated, and all students who come to LKH are clear as to the course of study they are pursuing. The risk of its courses ceasing to be delivered is considered very low, as the inevitable consequence would be the closure of LKH.

The constituent colleges work together to ensure that there is sufficient expertise amongst their teaching staff to deliver the modules offered each year. In the event that such expertise does not exist, either the modules offered will change for that year or expertise will be brought in from the wider academic community in and around Manchester. There are no courses that are dependent on single people.

LKH currently offers both midweek and weekend patterns of learning that can involve both full-time and part-time study. There is no anticipation that this will change and the risk of withdrawing any of the options currently available is considered very low. The staff team is able and committed to maintaining the current patterns, and this enables LKH to offer the kind of flexible training that is required by its sponsoring denominations.

Student Needs

LKH has trusted sponsor status and is therefore able to admit students requiring a Tier 4. There is no evidence to suggest that this status is threatened, but were policy changes to result in an inability to admit such students for study the consequent risks are considered low. This is due to the fact that LKH admits only a very small number of students on a Tier 4 visa and so there would be no significant drop in student numbers or income.

Apart from the loss of trusted sponsor status, there is no risk of not being able to teach a particular type of student. Provision is already in place to ensure that a range of disabilities are provided for, and there is special support for those with particular learning needs (including English language support).

There is the risk that LKH will not have sufficient numbers of students to provide an appropriate learning experience and to sustain the costs involved in running the institution. This risk is considered medium to low for the following reasons:

- It results from a general decline of individuals seeking ordination, and has been mitigated by a policy of attracting students from a wider range of churches who want to engage in theological learning.
- The learning experience is based on small group work and so it is not necessary to maintain high numbers in order to sustain the courses.
- Any further decline would be slow and could therefore be managed carefully over time, with appropriate decisions made by the Board.

2. The measures that you have put in place to mitigate those risks that you consider to be reasonably likely to crystallise

The LKH Board has in place a register of all perceived risks. This is maintained and carefully reviewed on a regular basis, and helps to ensure that any significant risks are identified, monitored and managed. As detailed above, the likelihood of non-continuation of studies for existing students is considered low.

There is a commitment on behalf of both the University of Manchester and LKH to ensure that all current students who have enrolled on a degree programme will receive the teaching and supervision necessary to complete their studies. Plans are in place to ensure that this happens. If LKH is unable, through no choice of its own, to continue offering one of its degree programmes through to completion, LKH has a written 'Memorandum of Understanding' with partner theological colleges (Cliff College, Nazarene Theological College and Spurgeon's College) to support each other's students in case of course closure or institutional termination. Students would be informed of each other's programmes and pathways where these closely match any closed programmes or pathways and be actively supported through an application process as required. This would include offering transfer credit, without additional charge, within the receiving programme to the full extent allowed by our respective academic regulations.

It is recognised that no single measure will be uniformly appropriate for each student in each instance. In the unlikely event that LKH is unable to offer continuation of study, there is a commitment to working with students to find the best support for them, so far as is possible.

3. Information about the policy you have in place to refund tuition fees and other relevant costs to your students and to provide compensation where necessary in the event that you are no longer able to preserve continuation of study

The LKH policy statement on 'Payments and Fees' includes the following statement:

Compensation for a failure to provide the agreed academic programme of study

In the event of LKH failing to provide the agreed academic programme of study, students will be entitled to a full refund of all fees that have been paid. Compensation will be paid whether the costs incurred take the form of a loan from the Student Loans Company, have been paid by a sponsor, or have been paid by the student themselves. Any agreed bursary payments will be honoured.

Arrangements are in place to offer students alternative opportunities to complete a course of theological study. Whether or not such opportunities are accepted, LKH will compensate for any appropriate claim for maintenance costs incurred and lost income suffered as a result of study at LKH.

As LKH is a specialist institution with a single focus, the circumstances that would lead to a failure to deliver agreed academic programmes would almost inevitably lead to the closure of the college. In this event the sale of the building (currently valued at £3 million) would provide any finance needed for compensation claims. In addition, the ongoing business that is linked with the charity has profits of in excess of £100,000 per annum, and this sum would be available for use by LKH.

4. Information about how you will communicate with students about your student protection plan

LKH will ensure that the student protection plan is made available to all staff and students through the VLE. The plan – together with other important programme information – will be introduced to students when they undergo induction processes at the beginning of their course of study.

Along with other policy and procedure statements, the student protection plan will be reviewed on an annual basis, with opportunity for changes to be proposed and agreed. Student officers and representatives are present at both Board meetings and Programme Committees where such reviews take place, and they are helped and encouraged to consult with the whole student community.

Any implementation of the student protection plan will be communicated to students through the LKH constituent colleges and their governing bodies, and this will take place as soon as possible. Such communication will include:

- Full details of the timescale to be followed.
- Full information of the alternative colleges and programmes that are available to students.
- Details of independent support and advice available to students (such as denominational officers).
- Full details of the compensation provisions that are in place.

Communication would be primarily by email.

As LKH is a small institution (100-150 students) it would be possible to arrange face to face meetings with affected students to discuss their future and the options available. This would be a priority.

Anyone wishing to complain about the way in which the Student Protection Plan is being implemented would be able to use the LKH usual complaints policy and procedures.

