

Cambridge Theological Federation

Student Protection Plan for 2018/2019

Provider's UKPRN: 10032072

Legal address: The Bounds, Westminster College, Lady Margaret Road, Cambridge, CB3 0BJ

Contact point for enquiries about this student protection plan: Alastair Oatey aio22@cam.ac.uk

This risk assessment considers the likelihood of non-continuation of study for CTF students where:

a. The CTF as a whole is no longer able to operate, or has decided to cease operating.

The risk of the CTF not being able to operate is low. During 2017/2018 the CTF has undergone a complete review of the way it works, including creating a new financial business plan, a new governance structure and new ways of organising internally how the courses with the three validating universities (Anglia Ruskin, Cambridge, Durham) are managed and run. These measures ensure that the Federation's operation has a renewed energy, agility and a focus on flourishing despite a context of a national declining trend of residential theological training.

The greatest risk to the CTF being unable to operate would be if the Church of England stopped funding ordinands for theological training through the CTF. Whilst the impact of this would be *major*, the likelihood is *remote* and so the risk is *low*. Any increase in likelihood would be planned well in advance and no such plans are underway.

There is no risk of the CTF itself choosing to cease operating. During the financial review, each of the member organisations was asked as part of a risk assessment exercise to consider how it might operate without the CTF and all responded with an affirmation of their support for the CTF. Letters written to the CTF by each of the member organisation include the following statement: "As an institution which is a member of the Federation, we are committed to ensuring that the Cambridge Theological Federation continues to flourish." The CTF is inviting two new members (the Faraday Institute and Westfield House) to join the Federation; further evidence of the commitment to continue operating.

There is a planned change in 2018/19 for one of the member institutions, the Eastern Region Ministry Course (ERMC), to have its own validation arrangements with Durham University for the delivery of Common Awards degrees. This is not the same as a provider deciding to cease operating and ERMC are remaining in the CTF as Associate Members.

b. The CTF has lost the power to award degrees or has lost validation for one or more of its courses.

The CTF does not have the power to award degrees. The likelihood of losing validation of degrees with each of the universities is very low and the CTF has always been able meet the requirements of each university fully. Renewed governance structures strengthen the commitment to academic excellence and enable those delivering each degree to have better control over the content of the teaching.

c. The CTF is, or expects to be, operating with probationary degree awarding powers.

Not applicable

- d. **One or more of the locations at which the CTF delivers courses to students is no longer available.**

There is a **very low** risk of the locations at which courses are delivered being no longer available. Courses are delivered in locations across the member institutions of the CTF and any unavailability, temporary or permanent, would mean using rooms at other locations in the CTF.

ERMC's move to its own validation arrangements with Durham University reduces the number of locations at which CTF courses are taught but this only affects ERMC students and has no risk of adversely affecting other students in the Federation.

The CTF delivers level 4 modules in St Andrew's Church, Enfield, which is a designated teaching resource within the Diocese of London so it is very unlikely to change its use. The site has been adapted for teaching and the risk of not being able to teach there is **very low**.

- e. **The CTF is no longer able to deliver courses to your students in one or more subject areas and/or departments.**
- f. **The CTF is no longer able to deliver material components of one or more courses, particularly if there are areas of particular vulnerability, such as single person dependencies for teaching.**

This is not a risk area for the CTF. The CTF only offers courses in one subject area (theology). The member institutions work together to ensure that there is sufficient expertise amongst their teaching staff to deliver each of the modules offered each year. In the event that such expertise does not exist in the Federation either the modules offered will change for that year or expertise will be brought in from the wider academic community in and around Cambridge; which is a considerable network from which to draw. There are no courses that are dependent on single people.

- g. **The CTF is no longer able to deliver one or more courses to your students.**

The CTF is not considering course closures in the next three years. There is **low risk** of not being able to deliver any of the degrees to CTF students and we are not considering course closures. To the contrary, we are in the process of new courses being validated and whilst new MAs with Anglia Ruskin University will, to an extent, be competing for students, the Common Awards MA with Durham will still be required for ordinands and so will continue to be offered.

- h. **The CTF is no longer able to deliver one or more modes of study to your students.**

We currently offer classroom, online and mixed modes of studying. We are not considering withdrawing any of these and the risk of doing so is **low**. The Anglican and United Reformed churches continue to fund full time residential training for a number of their ordinands and so the risk of stopping classroom delivery is **very low**. There is an increasing interest in flexible learning and so the risk of withdrawing distance learning or mixed mode learning is **low**. Plans are in place for additional modes of delivery such as teaching modules in intensive fortnights in the classroom, increasing the flexibility on offer to students.

i. **The CTF is no longer able to recruit or teach a particular type of student, such as international students.**

Loss of the CTF's trusted sponsor status would mean that the CTF is no longer able to admit students requiring a Tier 4 visa or students on short term study visas. The likelihood of this is **possible** and the consequences are **moderate** rating it as a **medium** risk. The risk is not directly to CTF but a possible reduction in student numbers and fee income for the CTF's member institutions could mean losses to several institutions' finances simultaneously. In extremis this could eventually lead to an inability to continue paying their full contribution to central costs.

Other than loss of trusted sponsor status, there is no risk of not being able to teach a particular type of student. The biggest remaining risk is of not being able to admit sufficient numbers of students for there to be a "critical mass" to sustain the costs of running both the CTF and its constituent member organisations. The risk comes in two dimensions; firstly the decline of individuals putting themselves forwards for ordination and secondly the trend away from full time residential training towards more flexible delivery modes. Whilst the likelihood of this is **possible** and the impact would be **major** we rate the risk as **moderate**, particularly in the knowledge that any change of likelihood would be a managed process with major consultation and debate before any decisions were made. There are currently no plans that would increase the likelihood. As discussed above, the increase of flexible learning derisks the impact of a decline in full time residential training.

None of these risks is particularly different for students with different needs, characteristics or circumstances.

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

As detailed above, we consider the likelihood of non-continuation of study for CTF students to be **unlikely** and so the risk **low**.

If the CTF chooses to stop delivering one or more of its degree programmes **there is a commitment** to ensuring that plans are in place for teaching-out all the students who have enrolled on that degree or ensuring that students are able to transfer to an equivalent degree with accreditation of prior learning. Where possible, students will be given a choice between teaching out and transferring.

If the CTF is unable, through no choice of its own, to continue offering one or more of its degree programmes and cannot offer a suitable alternative degree, we would look to the relevant validating university to teach-out all of the continuing students through to the end of their course.

The Academic Agreement with Anglia Ruskin University states:

22.7 In the event that ARU determines that CTF is unable, or for any other reason cannot continue, to operate and offer the applicable Courses and Programmes, either of ARU or a third party, as agreed between such parties, acting reasonably, shall operate the Courses and Programmes or similar programmes to enable such affected Students to complete their studies. In such an event, CTF agrees it shall transfer (so far as it is able to

do so, acting reasonably) relevant funding support it has received in relation to such Students to the party providing such academic provision.

The Partnership Agreement with the University of Cambridge states:

10.6 On termination of this Agreement for whatever reason, both Parties will ensure that Students who have already enrolled for an Award at the time of termination shall be given the opportunity to complete the Award within the normal prescribed period.

10.7 Notwithstanding the provisions in Clauses 10.1 and 10.6 above, both the University and the Federation shall fully discharge their responsibilities to any Federation Student who commenced study for an Award before notice was given of the termination of the Agreement, provided it is lawful to do so.

The Partnership Agreement with the University of Durham states:

8.6 On termination other than on grounds of Force Majeure, both Parties will ensure that Students who have already enrolled for the course at the time of termination shall be given the opportunity to complete the Programme within the normal prescribed period.

8.7 Notwithstanding the provisions in 8.1-8.6 above, both the University and the TEI shall fully discharge their responsibilities to any Student who commenced a Programme before notice was given of the termination of the Contract.

We also **have a commitment** to support individual students to find an alternative course at another provider if the CTF stops delivering one or more of its degree programmes (whether by choice or not) and no suitable alternative is offered. Such support is likely to include, but not be limited to, certification of credit or a record of academic achievement to facilitate admission to a receiving provider.

We acknowledge that no single measure will be uniformly appropriate for each student in each instance and that some students will need tailored support. In the unlikely event that the CTF is unable to offer continuation of study, the CTF **commits** to working with students to find the best support for them, so far as we are able.

Information about the policy you have in place to refund tuition fees and other costs to your students in the event that you are no longer able to preserve continuation of study

Please see our Refund and Compensation Policy

Delivering the financial implications

Your Student Protection Plan should set out how you will ensure that you can deliver the financial implications of your refund and compensation policy. Your assessment may demonstrate that you have adequate cash reserves to underwrite likely costs. Where this is not the case, you may need to take out insurance, or to establish a 'student refund and compensation' fund to cover likely costs. We understand that you may not have such arrangements in place when you apply for registration so where your Student Protection Plan indicates that they could be necessary we may apply an ongoing condition of registration requiring these arrangements to be in place by 31 July 2019.

These arrangements will be put in place during 2018/19.

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

We will share the Student Protection Plan with students by:

- Making it available on our public website.
- Referring to it in our terms and conditions document which is brought to the attention of applicants as well as those to whom offers are made.
- Referring to it explicitly in our offer letters.
- Reminding them about it annually through our newsletter.

We will share the Student Protection Plan with staff by:

- Making it available on our public website.
- Making reference to it in Hedwig (our Intranet and VLE).
- Including reference to it in our Quality Assurance and Enhancement Handbook.
- Including it in relevant staff training activities.

Reviewing the Student Protection Plan

The board, which includes student representation, will review the Student Protection Plan annually.

Executing the Student Protection Plan

Alerting to probability

As soon as the Board decided that it is **probable** that some or all students will be unable to continue their studies students will be informed of the situation, the reasons for the likelihood and the timetable for decisions being made. This will be communicated in phases by email to:

- The student representatives on the Student Forum.
- All DOSs, DOPS and tutors.
- Principals of the Houses and other key staff.
- The central Bounds House team.
- All students for whom we have email addresses.

Directors of Studies will arrange for face to face meetings with affected students to discuss the news and to start making contingency plans. Distance students may be included by telephone, skype or other communication media.

Letters will be sent to any students who cannot be contacted electronically or face to face.

Communications will be made directly and not through social media or another public forum.

Communicating the decision

As soon as the Board decide that it is **certain** that some or all students will be unable to continue their studies the decision will be announced as above. Directors of Studies will meet with students individually to work out a plan for each student, based on their own particular circumstances.

Any decision to close all or some courses will be made with at least one term's notice, with the decision being communicated ahead of the first day of the term in which the announcement is made.

Communications will be made together with the relevant validating university and will include information on what independent advice is available for students.

Complaints

Anyone wishing to complain about the way in which the Student Protection Plan is being implemented should use the CTF's usual complaints policy and procedures.