



Student Protection Plan

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004/21	<ul style="list-style-type: none"> Changed 'Heads of Department' to 'Senior Management Team' throughout Paragraph 6.2 i: Added words 'a course'...closure. In line 1 Paragraph 9.8: Clarified wording to reflect that student opinions are sought in a meeting between student representatives/senior staff. Paragraph 9.16: Clarified wording Paragraph 11.2: Clarified appeals procedure wording and added student recourse to the Office for the Independent Adjudicator. 	14/1/21	J Bradbury

050/24	General updates. Added provision for collaborative partners, and sections on risk analysis and review.	28/10/24 by Governors 25/10/24 by OfS	JB
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Student Protection Plan



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Introduction

1. This plan clarifies what an applicant or student can expect if unanticipated problems occur, including if their programme or institution were to close. It highlights the arrangements for informing and consulting with students so that their rights and the responsibility of Spurgeon's College (the College) is clear.
2. It has been produced to comply with condition C3 of the regulatory framework for higher education for England as set out by the Office for Students (OfS).

Purpose

3. It is important that the College has robust plans in place which protect higher education students if their programme cannot be fully delivered.
4. This document describes:
 - a. An assessment of the various risks to the continuation of study for students registered with the College, and steps that are in place to mitigate those risks.
 - b. The exceptional circumstances that will give rise to a decision by the College to suspend or close a programme of study and the arrangements that will be put in place in such an eventuality.
 - c. The exceptional circumstances that will give rise to closure of the College and the arrangements that will be put in place in such an eventuality.
 - d. The arrangements to be put in place in the event of changes to the awarding body or validation arrangements for a programme.
 - e. The arrangements made if Higher Education provision was withdrawn at the College.
5. In such circumstances, the College will ensure clarity of options, timely notification and clear arrangements for consulting with students.

Scope

6. The Student Protection Plan (SPP) is triggered by material changes such as those set out in paragraph 4, particularly those which could affect students' continued participation in their chosen programme of study.¹
7. The SPP relates to all applicants and students on College higher education programmes. It also identifies arrangements which will be made with accrediting bodies.²

Related Documents

- College Risk Register and Disaster Recovery/Business Continuity Plan
- College [Admissions Policy](#)

¹ Programmes of study are constructed to enable students to progress through the credit levels and, on achievement of the learning outcomes and credit requirements associated with each stage of the programme, to qualify for a validated award.

² For example, students who are completing programmes with the University of Manchester or Liverpool Hope University.

- College [Terms and Conditions of Programmes of Study](#)
- Student Complaints Procedure
- [Consumer law advice for higher education providers](#)
- [Student Transfer Policy \(External\)](#) & [Student Transfer Policy \(Internal\)](#)

Definitions

8. Programme Suspension: Suspension of a programme; this means that admissions will be suspended for a set period.
9. Programme Closure: This means that a programme will be withdrawn and closed indefinitely to applications or enrolments.

Risk Analysis

10. The College's Risk Register identifies key risks faced by the College, the likelihood of their occurrence, their potential impact, and actions being taken to reduce and mitigate the risks. The Register is subject to annual review by the Audit and Risk Committee and then by the Board of Governors. It is monitored throughout the year with an annual report on risk management presented to the Board for approval.
11. There are a variety of risks that could impact on the College's ability to operate as it does now, and may therefore impact a student's continuation of study. These include financial pressures, loss of degree awarding powers, cancellation of OfS registration, damage to or loss of buildings, loss of UKVI sponsorship status, or changes to the content or location of programmes.
12. The College has assessed the overall risk that it will be unable to preserve continuity of study as MEDIUM. Individual risks that make up this analysis are considered below.

Teaching quality/standards and loss of degree awarding powers

13. Founded in 1856, Spurgeon's College is the largest of the Baptist theological colleges in the British Isles and is seen as a centre of excellence for theological education and ministerial formation. The College offers undergraduate, postgraduate and counselling courses as well as a range of non-validated courses. In 2023 the College was awarded triple TEF Gold. This framework provides a resource for students to judge teaching quality in higher education institutions. The conclusion is that the quality of teaching at the College is of a high standard and the consequent risk to student's continuation of study is LOW.
14. In 2022 the College received temporary Taught Degree Awarding Powers from the OfS. The risk that the College loses or has restrictions placed on its degree awarding powers is MEDIUM due to it still being in a probationary period. This risk is mitigated by having in place a governance framework and quality assurance processes that ensure the College is complying with the Office for Students' regulatory framework, including its ongoing conditions of registration. If the OfS placed restrictions on, or withdrew, the College's degree awarding powers, the College would urgently seek a validating partnership with another institution. If a partnership could not be found, or not agreed within a relevant time frame, affected students would be given an exit award, certification of credit for the studies they have completed, and support to transfer to another provider.

15. Given the highly specialist nature of some programmes taught at the College, there is a risk that academic staff leave, and the College no longer has the specialist knowledge to continue teaching specific modules. This risk is mitigated by having policies in place to support recruitment and career development to help retain staff. The College would identify other members of staff with the appropriate skills and experience to fill any vacancies through alternative arrangements. In addition, the College has access to a wide variety of associate staff with the appropriate skills to cover vacancies in the short term. The risk to the student's continuity of study is therefore assessed as LOW.

Location of study

16. The College buildings are well maintained. In the event of a major incident rendering the buildings unable to operate, the College would initially move to online delivery of its programmes. The College has the technical infrastructure to enable this transition, as demonstrated by the continuation of study during the Covid pandemic. The College has an insurance plan that would enable it to find temporary alternate facilities to ensure continuation of its business and programmes of study. There is LOW risk of disruption to students due to issues with the location of study.

Removal of the College's Student Sponsor Licence

17. If the College's student sponsor licence was revoked by the Home Office, it would no longer be allowed to support international students requiring a student study visa. A licence is revoked if a higher education provider has its registration with the Office for Students removed. The College complies with all UKVI requirements and regularly tracks the engagement of its sponsored students to ensure that they meet their visa requirements. All students are required to meet with the International Students Officer twice per semester. The risk of losing its licence is considered LOW.

18. If the Home Office were to suspend or revoke the College's sponsor licence, the College would work with the affected students and applicants to minimise the disruption. Students already enrolled and studying at the College may be allowed to continue until the expiry date of their Confirmation of Acceptance of Studies (CAS).³ Other students would be advised on appropriate programmes and providers to which they could transfer. The College would issue students with relevant exit awards and certification of credit for the studies they had already completed. Appropriate refunds of tuition fees would be paid.

19. Any applicants who have yet to enrol will be informed, by letter or email, as soon as it is reasonably practicable. The College would refund any tuition fee and/or deposit that they have paid in advance. Where possible, the applicant may be given advice on how to apply to an alternative provider.

Changes to validation arrangements for a programme

20. The College teaches students registered on programmes that are validated by both the University of Manchester (UoM) and Liverpool Hope University (LHU). Both these validators have agreed exit arrangements following the anticipated end of their validation agreements; validated programmes are currently on teach out. These exit

³ Further details can be found at <https://www.gov.uk/government/publications/student-sponsor-guidance>

agreements ensure that students can continue their studies through to completion. In the event of a sudden withdrawal of validation arrangements with either institution, affected students will be offered a transfer to a Spurgeon's College validated programme, or offered advice regarding suitable programmes at alternate providers. The College will provide the student with a copy of their transcript. The risk to students from a change in validation arrangements is LOW. See paragraphs 34-37 for further details.

Major changes to the content of programmes

21. Major changes to the content of programmes occur as part of planned validation events or reviews, and fall under the College's [Curriculum Modification Policy](#). Due to consumer law, major modifications to programmes and any modifications affecting programme specifications will normally take place well before the period affected. Any changes outside this timetable will only be considered in exceptional circumstances, and will follow the procedures for student consultation and/or consent. The risk of the need for major in-year changes to programme content is LOW.

Programme suspension or closure

22. There are times when the College may suspend or close a programme due to factors such as changes in market demand. Where a programme is closed, the College will continue to teach the programme to existing students until such time as they complete their programme (teach-out). The risk to students from programme closure is therefore considered LOW. If teach out arrangements are not appropriate the College will enact the processes as outlined in paragraphs 28-33.

Financial risk

23. The whole sector is feeling increased financial pressures that are affecting running costs and income streams. The risk that we would need to close the College due to financial viability is currently HIGH, due to current financial pressures and forecasts. The College has a site development programme and business plan in place to address this issue. It is implementing a plan to reduce the operating deficit to help secure long-term sustainability.

24. Financial risk is mitigated by having in place financial management structures and risk management procedures to monitor finances. If College closure due to financial viability issues did occur, the impact would be very high and would affect all students. In this instance, the College would, if possible, close in a gradual way over a period that would allow current enrolled students to complete their programme on teach out, and/or explore partnership or transfer arrangements with other institutions. See paragraphs 38-45 for further details.

Responsibilities

25. It is imperative that before a change is implemented that the consequences are fully considered. Such consequences may include, for example, interrupted student experience, financial considerations, market demand, resource implications, consumer protection (students) and reputational issues.

26. It is the responsibility of the Vice Chancellor and Senior Management Team to:

- a. Determine whether the reason for a programme closure is valid and

acceptable. This must include consideration on how applicants/students will be supported.

- b. Determine whether there should be a restriction on the number of classes on an academic pathway.
- c. Determine whether the reason for removal of a programme from the current College portfolio is valid and acceptable.
- d. Agree and document the reasons for changes and complete the 'Programme Suspension and Closure Form'. This form must be submitted to the Academic Board for agreement if a programme is to be closed.
- e. Agree an action plan for managing the impact which must be following appropriate consultation with relevant stakeholders.
- f. Write formal communication to applicants/students after agreed actions are confirmed, and maintain communication and student query responses during cessation process.

27. It is the responsibility of the Deputy Vice-Chancellor, to:

- a. Ensure that the programme is removed from and/or information is amended on the UCAS database, the College website and other relevant platforms.
- b. Follow the College Admissions Policy in respect of any applicant holding an offer of a place.
- c. Check and update internal and external publicised information.
- d. Follow the College Terms and Conditions of Programmes of Study to be clear on the obligations to applicants and students.
- e. Inform the College's staff.

Programme suspension or closure

28. The College will aim to deliver programme provision as described in programme handbooks, programme specifications, unit descriptors, website information and other available information. However, at times it may be necessary to change this provision either before or after a student enrolls.

29. In the event of the College closing applications to a programme, the College will endeavour to continue to teach the programme to existing students until such time as they complete their programme (teach-out). In the unlikely event that teach-out arrangements are not appropriate the following processes will be enacted.

30. Reasons for a suspension of a programme could include:

- a. Loss of key staff whose expertise was required or changes in staffing.
- b. Insufficient enrolment and programme take-up makes it unviable and detrimental to the student experience.
- c. Restricted number of classes being offered in a particular curriculum area due to maximum room or resource restraints.
- d. Developments in the subject and QAA benchmark revisions.
- e. To safeguard academic standards, for example in response to external examiner feedback.
- f. Changes implemented by the Awarding or accreditation body (Professional Statutory and Regulatory Body (PSRB)).
- g. Following student feedback.

31. Programme suspension is agreed for one academic year or one intake through the

process outlined in paragraphs 25-27. Where a programme has been suspended for two consecutive years, the Vice-Chancellor and Senior Management Team should consider if it is appropriate to close the programme.

32. The decision to suspend a Programme will follow the process outlined in paragraphs 25-27.

- All planned programme suspensions will be submitted to the College's Academic Board for approval to ensure that implications of removing a programme of study are discussed. Where necessary, Chair's Action will be sought when meeting schedules would delay the process.
- Restrictions on the number of classes offered in a particular programme pathway area are agreed by the Academic Director after consultation with the appropriate Programme Committee and the Vice-Chancellor and Senior Management Team.

33. In the unlikely event that the College discontinues, suspends or does not provide a programme of study, the College will:

- a. Notify students at the earliest possible opportunity with full information on any changes that affect them, a rationale for those changes, and a timeline and process that will be followed.
- b. Offer support to students and invite them to discuss with relevant staff any changes that affect them and options that may be available to them.
- c. Seek to offer students a suitable replacement programme at the College, (if they request this and if they meet the relevant admissions criteria), or will seek to refer them to a comparable higher education institution offering a suitable replacement programme.
- d. Facilitate a student's withdrawal (or withdrawal of an application), if they do not wish to accept the College's replacement programme or is unable to offer a replacement programme. Notification of intention to withdraw an application should be made in writing to the College.
- e. Make an appropriate refund of tuition fees and deposits paid if they choose to withdraw and the College cannot offer a suitable replacement programme.

Changes to validation arrangements or awarding body for a programme

34. Changes to the validation or awarding body of a programme would normally be initiated for the next academic year unless there are circumstances outside of the College's control.

35. Reasons for changes to awarding body and validation agreements could include:

- a. Result of periodic review or programme re-approval process.
- b. Failure to gain programme approval.
- c. Developments in the subject mean that changing to an alternative awarding body or validating partner is in the interests of students.
- d. The validating partner has decided to cease to provide the validation for that programme.
- e. Receiving an unsatisfactory outcome following an Office for Student's review.
- f. External Bodies (such as PRSB's) require changes, suspension or closure of a programme.
- g. Closure of a validation partner or awarding body resulting in the withdrawal of the programme.

36. An action plan should be implemented to ensure existing students can complete their programme even if their specific qualification has changed or been withdrawn and will not run in subsequent years. On the rare occasions where a programme with enrolled students may no longer be accredited, the College will try and identify a suitable alternative programme to transfer to or assist in finding an alternative provider.
37. The action plan should include:
- a. Assessing the impact on programme management and delivery.
 - b. Formal communication to students, staff and notification to other stakeholders (e.g., external examiners, student's employers) to include the reasons for the decision.
 - c. Managing the implications for progressing students who need to retake units/modules.
 - d. Taking into account the needs of students who have interrupted their studies. Although, it should be noted that the College is unable to guarantee to students that the pathway for which they originally registered will still be available when they resume their studies
 - e. Abiding by the policies and procedures of the awarding body.

Closure of the College

38. In the exceptional circumstance that the College had to close, and the curriculum offer ceased, key measures as stated in the College Risk Register and Disaster Recovery and Business Continuity Plan would be invoked.

39. Exceptional circumstances could include, for example:

- A strategic decision by the College to close and exit the market altogether.
- Damage to the building, critical infrastructure or key resources as a result of fire, criminal damage or accident.

40. In a situation where the Governors take the decision to close, the College will make arrangements for affected students to switch to a different provider. Students who have not completed their programmes of study may be eligible for an exit (or intermediate) award. In the case of students enrolled on a programme validated by a partner institution, the validating partner will award eligible students when they leave a programme of study due to the closure of the College.⁴

41. If students wish to transfer to another institution and have their credits accepted by a new institution, students will need to apply to the new institution for Accredited Prior Learning. The procedures vary from institution to institution. However, the general approach is that a student's new institution will map the units of study the student has taken at Spurgeon's College against the units on their programme to ensure they are broadly equivalent. If they are broadly equivalent, they may award them credit. If they are not broadly equivalent, credit may not be awarded and therefore students might have to take some additional units.

42. It is entirely the decision of the institution to which students seek to transfer as to whether or not they are accepted onto their programme. The College cannot

⁴ Partner institutions, if approached by a student who is part way through a programme they award, may be able to offer some assistance or advice on suitable courses or transfers. However, this is at the discretion of the institution.

influence another institution's decision.

43. Appropriate refunds of tuition fees and/or deposits will be made. In the case of the closure of the College and the subsequent transfer of students to alternative providers, the Board of Governors will publish appropriate compensation details for affected students.
44. In the case of a Baptist Union (BU) ministers in training (MiT), the College would assist students in transferring to one of the other Baptist Colleges. The College will work in consultation with the Ministries Team of the Baptist Union of Great Britain, Regional Baptist Associations and local churches with whom the MiT is ministering.
45. The College is the validating body for other institutions. In the event of the closure of the College, partner institutions will be informed as soon as possible and according to the relevant Validation Agreement. Students registered with validating partners will be covered by the SPPs of the partner institution. Students who have not completed their programmes of study may be eligible for an exit (or intermediate) award. The College will provide students with a copy of their transcripts.

Closure of Higher Education provision

46. If a decision were made to close the higher education curriculum offer there should be early and ongoing discussions with students. These should include informing students of the plans, and outline the measures that will be taken to safeguard their educational experience. All students affected should be met and not just student representatives. Where possible, meetings should be held when students are timetabled to attend College.
47. The College is the validating body for other institutions. In the event of the closure of its higher education provision, partner institutions will be informed with as much notice as possible and according to the relevant Validation Agreement. Students registered with validating partners will be covered by the SPPs of the partner institution. Students who have not completed their programmes of study may be eligible for an exit (or intermediate) award. The College will provide students with a copy of their transcripts.
48. Where possible the admission cycle and academic calendar should be taken into account, allowing the best possible options for students to transfer to alternative providers. Arrangements will be made for affected students to switch to a different provider without having to start their programme from scratch including help to transfer credits where possible. Appropriate refunds of tuition fees and/or deposits will be made.

Communication with Students

49. The College is committed to the provision of comprehensive, open and transparent information enabling applicants and students to make informed decisions.
50. Students and applicants will be informed by the DVC or Head of Admissions and Placements (or their nominee). If an appointment is necessary, students can make an appointment by emailing the appropriate member of staff (email addresses are available via the College website). The College will send communications to students by email (sent to each student's Moodle email account) and by updates on Moodle. If an offer of study is withdrawn for any reason students will be informed in writing as

soon as it is reasonably practicable to do so; this will be emailed by the Head of Admissions and Placements or their nominee.

51. Where changes are such to render it impossible for prospective students to study on their intended programme and/or with the intended financial support, the College will endeavour to offer help to eligible applicants secure a place elsewhere and/or liaise with UCAS with a view to allowing the applicant a substitute choice in their application.

Right of Appeal

52. Students who are dissatisfied with the College's handling of any of the procedures contained within this document may use the [Student Complaints Procedure](#). Where a decision is made to close all higher education programmes or close down the site altogether it might not be possible for an applicant or student to submit a complaint. In such circumstances, a student has the right of appeal to the Office of the Independent Adjudicator (OIA) which provides an independent ombudsman service for students. More information can be found [here](#).

Review

53. This plan will be reviewed on an annual basis and presented to the Board of Governors for approval. Student-facing policies are amended with the input of the College's Student Representatives and only implemented at the beginning of an academic year. The SPP is published on the College website and on the VLE (Moodle).