METANOIA INSTITUTE

Student Protection Plan

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Introduction

The Metanoia Institute (hereafter “Metanoia Institute”; “Metanoia”; “the Institute”) is one of the UK’s leading providers of specialist higher education in the disciplines of psychotherapy, counselling psychology, counselling and, more recently, coaching and organisational development. Metanoia Institute values its long-standing reputation for providing education of outstanding relevance and quality and we aspire to work in partnership with our students in a learning environment which strongly encourages the mutually beneficial exchange of ideas, observations and experience.

Founded in the early 1980s, Metanoia is committed to a well-established ethos defined by an

understanding that no single approach to therapy is significantly more effective than any other, and all have something to offer the practicing clinician. The Institute's portfolio of study programmes continues to support the development of a coherent philosophical, professional and ethical base for clinical practice and to enable students to become authoritative in the critical evaluation of philosophical paradigms and value systems in relation to therapeutic work.

Metanoia Institute's Strategic Priorities 2023-2028 set out, in sum, to invest in the life of individuals, organisations and communities through excellence in training, practice and research in the psychological therapies. Metanoia's published strategic aims are fourfold:

Strategic Aim 1:
To foster a culture of inclusion that promotes diversity, equity and belonging for all students and staff through inclusive teaching practices, an inclusive curriculum, and an inclusive environment.

Strategic Aim 2:
To drive innovation across all aspects of our institution by modernising education design and delivery methods, upgrading supporting infrastructure, enhancing our brand and marketing efforts, and leveraging digitisation.

Strategic Aim 3:
To become an intelligence-led institution that prioritises data-driven decision-making, evidence-based education and practice and a student-centred approach whilst staying ahead of emerging trends in Higher Education.

Strategic Aim 4:
To ensure long-term sustainability by becoming an autonomous organisation, maximising growth and income opportunities, and embedding sustainable development principles across all our plans, including financial security.

A. Context, risk assessment and scope

The Higher Education and Research Act 2017[1] requires all higher education providers to produce and publish a Student Protection Plan which articulates how a provider will preserve the continuation and quality of study for students. In developing this Plan, Metanoia Institute has considered the range of potential scenarios set out by the Office for Students and has, for each, assessed the risk and impact, however unlikely the scenario to unfold. Towards that end, this Plan sets out a range of potential scenarios which, if realised, could impact upon continuation of study for students. For each scenario, the Plan includes a range of measures that would be considered to mitigate the impact on the continuation of study for students, should the scenario come to pass.

When an applicant accepts an offer of a place and registers to study with Metanoia, the Institute fully expects to be able to deliver the chosen programme through to completion of studies. Metanoia has well-established procedures for assessing risk and mitigating any risk factors or perceived issues in a responsive, timely manner. The Institute operates internal monitoring and review procedures to identify relevant risk-factors and pre-empt any programme-level issues that have the potential to affect delivery and the student experience. The Institutional risk registers and operational plans secure oversight of risk factors from a strategic level and are monitored regularly through the governance structure and by the Institute's Board of Trustees.

In the event of any of the risks identified in this Plan materialising, Metanoia Institute is committed to preserving the continuation of study for all current students and minimising any disruption and/or disadvantage. The Institute is committed to communicating and consulting with

[1] Higher Education and Research Act 2017

students as early as possible should any of the risks materialise, and students will be provided with support and guidance as appropriate. Sometimes, it may be necessary to make minor changes (adjustments) to programmes of study and other services and facilities that do not amount to changes to programme aims or learning outcomes. Minor changes may include, for example, amendments to a schedule of taught sessions or alterations to the finer detail of some module assessments. The procedures for this are set out in the Institute's Programme and Module Amendment Policy and Procedures.

The Institute has judged that the risks noted below are relevant in terms of student protection considerations. The Institute looks to maintain its reputation as a reliable, high-quality education and training provider for higher education and professional programmes of study, securing longevity and good standing for our programme portfolio and student applicant base. Metanoia values its experienced and diverse student body, noting that as a training provider recognised for professional development and sector-specific accreditation-based training, the importance of brand security and reputational resilience is of paramount importance.

Potential scenarios that could represent a risk to continuation of study

The range of potential scenarios and/or risks to the continuation of study for students is set out below. It is acknowledged that, if realised, the impact on each student experience may differ in terms of an individual's needs and circumstances. As a result, the list below indicates measures that Metanoia would put in place should the risk materialise and proposed changes to relevant processes and procedures which may be developed/ amended as necessary for each individual. Additionally, the likelihood of these risks affecting current provision at the Institute has also been indicated below.

Risk scenario 1: **Degree awarding powers**

Metanoia Institute may be unsuccessful at securing full (subject-specific) degree-awarding powers (DAPs) for its taught provision. This is considered to be medium risk for the following reasons:

- The Institute has a strong track record of delivery of high quality academic and professional training courses and qualifications and has achieved successful outcomes through a number external quality assessments including those undertaken by the Quality Assurance Agency for Higher Education (QAA) and relevant Professional, Statutory and Regulatory Bodies (PSRBs). Through these critically evaluative processes, Metanoia has assured itself of its readiness to operate as an independent academic awarding body. Further, by making judicious institutional appointments in 2024, with a carefully planned period of scrupulous preparation well under way, including detailed work on a substantial dossier of evidence to support the OfS' team's scrutiny activity), the Institute is strengthening its position in this regard.

- During preparations for the DAPs assessment process, the Institute maintains an effective and fruitful academic relationship with Middlesex University, the Institute's long-standing collaborative partner. This partnership was successfully renewed in 2025 to at least August 2026. Also, the full suite of University validated degree programmes is undergoing revalidation and some of this activity has been successfully completed for roll out in 26/27. Through this collaborative activity, learners on programmes of study validated by the University will be protected and fully enabled to succeed on their chosen programmes. All MI programmes in psychology and counselling, those validated and not validated by Middlesex, remain formally recognised by the relevant professional bodies (UKCP, BCAP, and so on) and so their professional value is thereby assured.

NOTE: All registered students, staff and placement providers will be kept apprised of any changes to programme management between Metanoia Institute and Middlesex University. This will include the confirmation that in advance of any transition phase, students will be offered opportunities to continue studies leading to an award by either awarding partner, including named exit awards for completion at Levels 5-7, as appropriate.

Risk scenario 2: **University partner validation**

Metanoia Institute may fail to maintain awarding partner validation. This is considered to be low risk for the following reasons:

- Metanoia has ensured additional security in the terms of the arrangements within the collaborative and joint- partnership relationship with Middlesex University as raised above. A greater security in the relationship avoids the high financial investment cost if a new validating partner was required prior to the Institute securing degree-awarding powers.

- Contingency planning is embedded within all contractual arrangements with collaborative partners, agreements that containing guidance to ensure that there are clear plans for making staff contact details, teaching, learning and assessment materials and student assessment and progress information available via electronic media to the University link tutor(s) as necessary. Specifically, the signed validation agreement between Middlesex University and the Institute confirms that “Contingency plans are concerned with protecting the interests of students on collaborative programmes delivered by partners unable to continue to offer MU awards. The intention of the contingency plans is to put in place arrangements that would allow such students to complete identical or similar University awards”.

NOTE: The Institute notes that the long-term risk for doctorate programmes is mitigated by the validating partner, Middlesex University, as part of the partnership agreement for joint programmes.

Risk scenario 3: **Board of Trustees**

The Institute’s Board of Trustees may fail in their statutory duties, powers and responsibilities. This is considered to be low risk for the following reasons:

- This risk factor is mitigated by the regular convening of the Board of Trustees (BOT) and the recording of meetings in the form of minutes; the activity of its sub-committees – Staffing and Remuneration (SARSC) and Finance, Audit and Risk (FARSC); Board of Trustees member skills audits and training activity; and support directly from the Chief Executive Officer (CEO).

Risk scenario 4: **PSRB accreditation / designation**

Metanoia Institute may face a loss of designation/ accreditation by one or more of the relevant HE sector regulatory bodies (OfS) and PSRB’s (UKCP, BACP, BPS, HCPC, EATA). This is considered low risk for the following reasons:

- This is recognised as both programme-level and Institutional-level risk. In order to reduce this risk, the Institute operates a system of scrupulous planning and preparation for any and all review / assessment events (programme and institutional) to ensure it has the best chance of a successful outcome.

- Metanoia has invested in a substantial professional services staff team across all

academic departments and centrally to support these events.

- The Institute has an effective governance structure within which it secures academic standards and maintains and enhances quality. This activity includes preparations for accreditation and similar events. As the academic authority in the institution, Academic Board reports to the Board of Trustees and delegates a series of responsibilities to its sub-committees, including Education Committee. All meetings are serviced by a governance officer, who acts as Secretary to the Board/Committee, maintaining an accurate record of each meeting, its deliberations and decision-making.

Risk scenario 5: **Staffing and the student experience**

The Institute's staff community (academic and professional) may have insufficient capability or capacity to manage workloads or to support the student journey appropriately to ensure an excellent, high-quality experience. This is considered medium risk for the following reasons:

- The Institute operates a Workforce Management Plan, incorporating staff reviews/ anticipating up-skilling, ensuring appropriate staff profiles and functions, with periodic objectives being set through agreement with line management. These objectives and their meeting are kept under regular review to ensure effective and manageable working.

- An updated Workload Model and contractual requirements for teaching staff to have or be working towards relevant qualifications supports effective and efficient workload management and deployment.

- The Institute's recruitment and staff management processes are designed to support activity to maintain excellence in teaching (recruiting experienced supervisors; ensuring access to IT applications; relevant marketing and promotion of the branding and ethos of the Institute) –this is in place through revised Person Specification/ Job Descriptions to support allocated research time; workload monitoring via staff-student ratio calculations and an established commitment to relevant PSRB standards (clinical practice commitment support for all academic staff).

Risk scenario 6: **Currency of programmes**

Metanoia Institute may not meet demand for new qualifications incorporating current research/ new study modes/ integration of online programmes or Continuing Professional Development (CPD) activity. This is considered to be low risk for the following reasons:

- It is recognised that failure in any HE institution to maintain high-quality teaching and research activity (where relevant) could impact negatively on student recruitment and retention. In Metanoia's case, the Institute's reputation would be affected detrimentally if its programmes did not remain current, valid and relevant to sector-employment opportunities in the area of counselling and psychological therapies.

- Also, failure to adopt and exploit new technologies, where appropriate, and the opportunities that come with this, failure to adequately expand into the on-line market regarding CPD and on-line / blended education and training to make the learning opportunities relevant and accessible to a wider constituency, for example, could negatively affect the reputation of the Institute.

- Metanoia Institute mitigates this potential through programme development and internal validation processes that incorporate external expertise and advice whilst adhering to PSRB re-accreditation and monitoring in terms of sector standards for our programmes.

Further, where provision is validated by Middlesex University, externality is central to that institution's own approval and review processes.

- Additionally, programme team members and their senior colleagues are enabled to ensure that their subject-specific knowledge remains current and responsive to sector demands through the maintenance of their own clinical practice (PSRB requirements) and professional memberships and networks.

Risk scenario 7: **Attraction and retention of highly qualified staff**

The Institute may fail to retain or attract sufficiently (highly) qualified staff, resulting in a reputational and quality risk. This is considered medium risk for the following reasons:

- Metanoia mitigates this risk through suitable investment in human resources (HR) and CPD activity, in-house staff development activity, competitive remuneration packages and terms of employment, supportive working environments, succession planning and access to external support and professional development opportunities, including engaging in scholarship.

Risk scenario 8: **Institutional and programme growth**

Metanoia Institute's infrastructure may fail to support programme growth. This is considered low risk for the following reasons:

- The Institute's Executive Committee is alert to the resource and infrastructure needs to develop programme cohorts, grow the Institute's qualifications and short-course portfolio and actively support and develop its research activity.

- Programme validation, monitoring and review supports an evidence-based approach to essential strategic planning. This ensures that forward-planning can be assured to support any increase in student numbers to accommodate new provision, growth in demand for placements, supervisors, support staff, and so on.

Risk scenario 9: **Institutional leadership**

The Institute may identify weak leadership among Heads of Programme, who may struggle to satisfactorily engage with the leadership tasks which are central to the role. This is considered to be low risk for the following reasons:

- This risk is mitigated by effective recruitment and appointment processes, staff inductions and reviews, regular Heads of Programme meetings to support and induct new members and create a supportive peer team.

Risk scenario 10: **External examining**

Metanoia Institute may fail to recruit high quality external examiners. This is considered low risk for the following reasons:

- The Institute maintains professional body memberships and active networks which helps in identifying suitable candidates in advance of an extant external examiner's end of tenure. Also, the Institute operates a shadow External Examiner management strategy with Middlesex University, which will operate independently once degree-awarding powers have been secured for the Institute.

Risk scenario 11: **Financial sustainability**

Metanoia Institute may fail to maintain financial sustainability, solvency and liquidity. This is considered to be low risk for the following reasons:

- Metanoia Institute has assessed the risk of maintaining financial sustainability, solvency, and liquidity, and concludes this risk to be low due to several factors:

- Metanoia maintains a robust financial position to support investment in staff and a comprehensive, high-quality student experience from initial enquiry through to graduation.

- Considering the economic and political uncertainties within the higher education sector, the Institute's reserve strategy ensures sufficient liquidity to operate within a higher-risk environment, allowing it to sustain its commitment to academic and operational excellence.

- The financial outlook for Metanoia remains positive despite the presence of risks. The Institute's strong cash reserves are further supported by ownership of two debt-free, substantial freehold properties in West London, providing valuable assets.

- Budgeting and forecasting are based on a thorough assessment of new and continuing student volumes, incorporating data-driven models to optimise resource allocation and continuously enhance the student experience.

- Metanoia's financial strategy aims to:

- generate a surplus to enable long-term investments in staff development, infrastructure, and technology; and
- ensure value for money for students and the Institute without compromising on quality.

- Financial operations follow best practices and the Institute's Financial Operations Manual, with the CEO overseeing payment authorisations. Quarterly management accounts, budget reviews, and an annual reserve review provide robust oversight. The Director of Finance also maintains a continuous evaluation of finance-related technology needs.

- The Institute's proactive cash flow management ensures liquid assets to meet short-term obligations while supporting longer-term projects. Creditor payments are consistently timely, and prudent budgeting practices mitigate unforeseen financial risks.

- Metanoia's annual budgetary planning, led by the Director of Finance and CEO, includes risk-adjusted forecasting to promote responsible financial stewardship. Budget proposals are reviewed by the Finance, Audit and Risk Sub-Committee and submitted to the Board of Trustees for approval.

- Metanoia undergoes annual external audits to ensure that its financial practices adhere to the highest standards of accuracy and regulatory compliance. These audits, conducted by independent auditors, provide an objective assessment of the Institute's financial health and operational integrity. The audit findings are reviewed by the Finance, Audit, and Risk Sub-Committee and subsequently presented to the Board of Trustees. This process not only reinforces transparency but also fosters trust among stakeholders and enhances long-term financial resilience.

Risk scenario 12: **Widening access and participation**

The Institute may fail to attract a diverse student population. This is considered to be a medium risk for the following reasons:

- Metanoia Institute is committed to continuously improving the rates of access, success and progression amongst groups where participation in higher education and entry to the counselling and psychotherapy professions remains low. This includes, but is not limited to, individuals from areas of significant deprivation, students of particular ethnicities, learners with a disability or particular need, care-experienced individuals, refugees and people from other communities such as Gypsy, Roma or those from a Traveller background. Metanoia fosters a welcoming and inclusive environment that reflects the professional values of counselling and psychotherapy.

- Further, Metanoia operates a fair and transparent admissions policy[2] and related procedures with clear published entry criteria for its courses. Prior qualifications are not in themselves the basis for acceptance onto a programme of study. The Institute operates a Skills Certificate course that provides the basis for entry to our training programmes.

- The Institute encourages and supports widening access and participation on our programmes through:

- the inclusion of non-standard entry requirements;
- a student bursary and scholarship schemes based on an applicant's financial status;
- lower undergraduate course fees for higher education programmes than traditional providers; and
- timetabling of teaching at weekends.

- The Institute's Strategy 2023-2028[3] establishes at a higher level Metanoia's ambition to attract and retain students from a wide demographic to enrich the learning experience for all students across the Institute's undergraduate and postgraduate provision. This objective is articulated further and realised through the Institute's Education Strategy and Learning, Teaching and Assessment Strategy.

- The Institute's approach to widening participation and enabling access to those who might otherwise be excluded from studying in the areas of psychology and counselling is set out in greater details in its published Access and Participation Statement[4]. Further, Metanoia has submitted an Access and Participation Plan (APP) to the Office for Students which, if approved will become operational in Academic Year 26/27.

Risk scenario 13: **Quality of learning and teaching**

The Institute may be unable to maintain an appropriate level of quality in teaching and learning across all programmes of study. This is considered low risk for the following reasons:

- The Institute has robust staff recruitment policies and procedures that ensure the best candidate for each post is recruited, supported by a detailed induction schedule and ongoing support and training for each member of staff.

- Further, Metanoia operates a peer review scheme to support individuals new to teaching and those more established in their careers.

- Programmes at Metanoia benefit from external examiner oversight and the expertise that

[2] https://www.metanoia.ac.uk/about/policies-and-procedures/
[3] https://www.metanoia.ac.uk/media/3406/metanoia-strategy-2023-2028.pdf
[4] Metanoia Institute's Access and Participation Statement

brings to the learning, teaching and assessment, while a range of quality assurance related processes, including monitoring and review, are in place to ensure cyclical and periodic scrutiny and evaluation operates across the Institute to ensure standards of learning and teaching remain high. The full range of mechanisms that support this are set out in the Institute's Quality Handbook and its Governance Handbook.

Risk scenario 14: **Student placements**

Metanoia Institute's placement arrangements with providers (involving employers and mentors, for example) may fail to meet the high standards of provision required by Departments and their programme teams. This is considered to be medium risk for the following reasons:

- The Institute mitigates this issue through monitoring activities and placement oversight by the employment and deployment of qualified and experienced members of staff. This activity is guided by a series of policies and procedures that include the raising of concerns in relation to a placement and the remedial actions available to staff.

- Student expectations are managed and guided through detailed information-and-advice-focused induction sessions and tutor-led guidance assemblies. Handbooks and programme materials support this activity to ensure suitable preparation and accurate information sharing.

- This information includes details of the policy in place to support students to secure and while on placements, placement transfer facilitation, the refund of tuition fees (where applicable) and other relevant costs to students. In addition, the policy covers the matter of potential compensation in the event of non-continuation of the placement.

Other scenarios

a. On ceasing to offer a programme or programmes

In the event that the Institute ceases to offer programmes, the following will apply:

- Refund for students in receipt of tuition fee loans from the Student Loans Company (SLC). Students whose fees are covered by the Student Loans Company are entitled to the deposit being reimbursed on providing evidence of the loan. Should the programme no longer continue, course fees will be refunded to the Student Loans Company, removing all financial liability for the student.

- Refund for students who pay their own tuition fees and/or sponsorship: contracts are issued annually, signed by the student, and returned with a deposit or full payment. Should a programme be withdrawn or cancelled, the deposit and/or fee paid will be refunded to the student or sponsor. The Institute will assist with an APL application and/or facilitate a transfer to a similar institution for continuation of studies, as requested.

- Payment of additional travel costs for students affected by a change in the location of their course: the Institute will reimburse any reasonable travel costs due to a change in location of programmes.

- Commitment to honour student bursaries: bursaries are issued on an annual basis and reduce fees due by the student. Should a programme be cancelled, these will become inapplicable. Students will be reimbursed the agreed contracted fee for the course, after taking into account the bursary allocation.

- Compensation for tuition and maintenance costs where students have to transfer courses or provider: Metanoia Institute maintains a Tuition Reimbursement/Protection

Insurance Policy with Chubb Limited brokered by Endsleigh Insurances Limited to provide refunds and compensation expressed as a percentage of student tuition fees when unforeseen circumstances arise for either the student or the tuition payer, which prevents the student from being able to continue their studies/attendance (e.g. death, accidental death, accident and sickness disability, critical illness and involuntary unemployment). This is a group policy with Metanoia Institute as the policy holder and students effectively its members.

b. A student wishes to transfer to another provider

- In the event a student wants to transfer from Metanoia Institute to another provider, the process for registering an intention to transfer out of Metanoia Institute into another Institution begins with discussions with the relevant Head of Programme. Please see Student Transfer Policy. The Institute will provide support for the student relating to possible providers for continuation of study; support for reference materials and/ or interview preparation required for onward study; to facilitate any outstanding discussions with Finance; Library; Academic Staff as necessary to fulfil closure of study by agreed end dates (as stated in withdrawal confirmation). Any Students due to receive an Interim Award for completion of modules or meeting exit award requirements for a particular programme, will be automatically submitted to the next Programme Board. Once confirmed, a certificate and transcript will be provided. Students without an Interim Award but with Completed Modules can request a partial Transcript. This transcript will provide details on all assessment and module study undertaken by the student whilst registered on their current programme, and will include the level of study, the number of credits and the grades achieved (as applicable).

How Metanoia communicates with students about this Student Protection Plan

The Institute's Course Representatives (Reps) are invited to comment on and contribute to a draft of each iteration of the Plan as it is refreshed by members of the Academic Registry team on a two-yearly cycle.

Following endorsement by the Executive and approval by the Board of Trustees, the Plan is published on the Institute's website (for current, prospective and future students and other stakeholders). A communication to the student body is sent out centrally to inform every registered student of the Plan's publication. Matters or concerns in relation to the Plan may be raised at a programme (course) level, Department level or at the Joint Staff-Student Committee (JSSC), which convenes quarterly.

Key Policies and information relevant to this Plan

- Course Closure Policy
- Fee liability information
- Student Complaints Policy and Procedure