

## **Quality in Formation Panel**

# **Inspection Report**

Eastern Region Ministry Course
Norwich Diocesan Ministry Course
St Edmundsbury and Ipswich
Ministry Course

November 2011

**Ministry Division** Church House **Great Smith Street London SW1P 3AZ** Tel: 020 7898 1412

Fax: 020 7898 1421

Published 2012 by the Ministry Division of the Archbishops' Council Copyright © The Archbishops' Council 2012

## **CONTENTS**

GLOSSARY LIST OF INSPECTORS	
THE INSPECTIONS FRAMEWORK	1
SUMMARY	2
FULL REPORT	5
INTRODUCTIONSECTION ONE: AIMS AND KEY RELATIONS	
A Aims, objectives and evaluation of the institution	
B Relationship with other institutions.	9
SECTION TWO: CURRICULUM FOR FORMATION AND EDUCATION	
C Curriculum for formation and education	
SECTION THREE: MINISTERIAL DEVELOPMENT	15
D Community and Corporate Life	
E Worship and training in public worship	16
F Ministerial, personal and spiritual formation	19
SECTION FOUR: EDUCATION AND TRAINING	
G Teaching and learning: content, method and resources	22
H Practical and pastoral theology	26
SECTION FIVE: STAFF AND STUDENTS	
I Teaching Staff	28
J Ancillary staff	29
K Students	30
SECTION SIX: GOVERNANCE, MANAGEMENT AND FINANCE	32
L Governance, management, constitution and organisation	32
M Business planning and risk management	
N Financial policies and cost-effectiveness	
O Reserves policy and statutory liabilities	
P Accommodation	
CONCLUSION	41
LIST OF RECOMMENDATIONS	42

## **GLOSSARY**

ARU Anglia Ruskin University

CTF Cambridge Theological Federation

**ERMCEastern Region Ministry Course** 

**ERTP Eastern Regional Training Partnership NDMCNorwich Diocesan Ministry Course** 

EIDMC St Edmundsbury and Ipswich Diocesan Ministry Course FedNet The Cambridge Theological Federation's online material

#### LIST OF INSPECTORS

**The Revd Robert Reiss**, Senior Inspector, Canon of Westminster and Sub-Dean

**The Revd Christopher Batten**, Supernumerary Methodist Minister Milton Keynes United Area; formerly Academic Registrar of the Open University.

The Revd Canon Professor Paul Bradshaw, Professor of Theology, Notre Dame University

**Hiranthi Fernando**, Chartered Accountant and former Director of Finance & IT, Chelmsford Diocesan Board of Finance

The Revd Nicholas Moir, Vicar of St Andrew's, Chesterton, Diocese of Ely

The Rt Revd Mark Sowerby, Bishop of Horsham

**The Reverend Dr Phillip Tovey**, Deputy Warden of Readers and Director Postgraduate Curates Course, Diocese of Oxford, and Liturgy Tutor Ripon College Cuddesdon

#### THE INSPECTIONS FRAMEWORK

On behalf of the sponsoring churches, inspection teams are asked to assess the fitness for purpose of the training institution for preparing candidates for ordained and licensed ministry and to make recommendations for the enhancement of the life and work of the institution.

Within the structures of the Church of England, this report is prepared for the House of Bishops acting through the Ministry Council.

In coming to their judgements, inspectors are asked to use the following outcomes with regard to the overall outcome and individual criteria:

#### Confidence

Overall outcome: a number of recommendations, none of which question the generally high standards found in the inspection.

Criteria level: aspects of an institution's life which show good or best practice.

#### **Confidence with qualifications**

Overall outcome: A number of recommendations, including one or more of substance that questions the generally acceptable standards found in the inspection and which can be rectified or substantially addressed by the institution in the coming 12 months.

Criteria level: aspects of an institution's life which show either (a) at least satisfactory practice but with some parts which are not satisfactory or (b) some unsatisfactory practice but where the institution has the capacity to address the issues within 12 months.

#### No confidence

Overall outcome: A number of recommendations, including one or more of substance which raise significant questions about the standards found in the inspection and the capacity of the institution to rectify or substantially address these in the coming 12 months.

Criteria level: aspects of an institution's life which show either (a) generally not satisfactory practice or (b) some unsatisfactory practice where it is not evident that the institution can rectify the issues within the coming 12 months.

#### THE REPORT OF THE INSPECTION OF

Eastern Region Ministerial Training Scheme Norwich Diocesan Ministry Course Diocese of St Edmundsbury and Ipswich Ministry Course

September to November 2011

#### SUMMARY

#### Introduction

The Eastern Region Ministry Course works in close partnership with the Norwich Diocesan Ministry Course and, more recently, with the St Edmundsbury and Ipswich Diocesan Ministry Course. Between them they train Anglican candidates for stipendiary and non-stipendiary ministry (self supporting ministry) from six English Dioceses and from the Diocese of Europe, candidates for Ordained Local Ministry from Norwich and St Edmundsbury and Ipswich Dioceses, and Readers from those two Dioceses. In addition the Diocese of St Albans uses ERMC for training its Readers. ERMC also trains four candidates for ministry from the Methodist Church in the region.

ERMC is a full member of the Cambridge Theological Federation and the two Diocesan Courses are associate members. Courses are validated through the link between the Cambridge Theological Federation and Anglia Ruskin University based in Cambridge.

Training is provided through weekly sessions at Norwich and St Albans for those students able to get to them, with some additional centres in the Diocese of St Albans primarily for Reader candidates, through local training groups in St Edmundsbury and Ipswich, through some e-learning, through some more local tutors for other students and through a series of residential weekends and a summer school.

#### **Summary of outcomes**

The inspection team regards all three schemes as fit for purpose for preparing candidates for ordained and licensed ministry.

CRITERIA	OUTCOME
A. Aims, objectives and evaluation of the institution	Confidence
B Relationships with other institutions	Confidence with qualifications
C Curriculum for formation and education	Confidence with qualifications
D Community and corporate life	Confidence

E Worship and training in public worship	Confidence with
2 Trotomp and training in pasie trotomp	qualifications
F Ministerial, personal and spiritual formation	Confidence
G Teaching and learning: content, method and	Confidence with
resources	qualifications
H Practical and pastoral theology	Confidence
I Teaching staff	Confidence
J Ancillary staff	Confidence
K Students	Confidence
L Governance, management, constitution and	Confidence with
organisation	qualifications
M Business planning and risk management	No Confidence
N Financial policies and cost-effectiveness	Confidence with
	qualifications
O Reserves policy and statutory liabilities	Confidence with
	qualifications
P Accommodation	Confidence
Overall Outcome	Confidence with qualifications

#### **General observations**

This is a moment of great transition in all the Courses covered in this report for reasons which we spell out in greater detail in the full report. Against such a background of major challenges we believe the staffs of all three courses are much to be commended for the way they have retained the vitality and buoyant spirit of the student bodies and maintained a programme of training that has much that is very good. This is a very significant achievement in demanding circumstances.

Since the last inspections of all three courses they have come together in a very positive way. First NDMC came into partnership with what is now ERMC in 2006, with the partnership further developed in 2008. EIDMC came into effective partnership with the other courses with the Summer School of 2010.

The Courses have continued to be forward looking. The Governing Body of ERMC produced a statement of strategy and priorities in 2009 and an updated version was presented in February of this year. Many of the Module Booklets used by all three courses have been revised and an innovative approach to elearning has been developed using 'Moodle' and Adobe Connect. All of this shows a willingness to face the current challenges with a positive spirit.

#### **Strengths**

The strengths of all three courses lie in

- The strong sense of community, evident both in the local centres but most especially at the residential weekends
- The quality and diversity of the student body
- A comprehensiveness that actively values the various traditions of the Church of England and practises ecumenism between churches
- The strong emphasis on theological reflection
- The internal communications, e.g handbook, mailings, module booklets and the CTF's on-line resources 'FedNet' are all clear and well produced
- The willingness to innovate with Moodle and Adobe Connect

#### Areas for attention

The areas for attention include:

- The complexity, duplication of effort and inefficiency of the current arrangements between ERMC and the two related diocesan Courses point to the need for a review with the dioceses and sponsoring churches on the future institutional shape of the training institutions
- The variability of teaching quality
- The balance of worship, particularly at the residential weekends, with particular regard to the use of authorized forms of Anglican worship
- Uncertainty about future student numbers and consequent financing and, in the case of ERMC the setting in place of adequate governance to relieve the current undue load on the Principal
- Contingency planning with regard to finances for ERMC
- Putting in place standard requirements with some compliance issues for ERMC

## **FULL REPORT**

## INTRODUCTION

- 1. The inspectors would like to thank the staff of all three Courses for the very full written information they provided to the Inspection team and for the unfailing courtesy with which they responded to our various queries. We would also like to thank the student body for the warmth of the welcome they gave to us, which was itself evidence of an excellent community spirit in all three Courses.
- 2. Ministry options being pursued through the Courses include for Anglicans those training for stipendiary and non-stipendiary (self-supporting) ministry, for ordained local ministry (for candidates from Norwich and from St Edmundsbury and Ipswich Dioceses through their Diocesan Courses) and for Reader ministry in Norwich, St Edmundsbury and Ipswich, and St Albans Dioceses. There is also the possibility of training for Pioneer Ministry, two candidates for which were ordained from ERMC last year. The current Methodist students (4 in number) are all preparing for presbyteral ministry.
- 3. The courses followed by students are part of the overall programme for ministerial training provided by the Cambridge Theological Federation, which in turn is validated by Anglia Ruskin University. ERMC is a full member of the Federation, the Principal of ERMC being currently the President of the Federation, and the two Diocesan Courses are associate members. The vast majority of students are following the Foundation degree Award from Anglia Ruskin University, but a small number are doing an MA in Pastoral Theology also awarded by ARU. There are other options available for some students, currently followed only by a very few.
- 4. The educational work is done through a residential summer school, a number of residential weekends throughout the year and either weekly sessions at the Emmaus House at Norwich and at the centre at St Albans Abbey (with other smaller centres used for Reader training in St Albans Diocese), or for other students, particularly those on EIDMC, through small local training groups, or for some with a local tutor. There are some dispersed students in the Diocese of Europe and some of the more remote parts of East Anglia who are not able to get easily to a local tutor or a tutor-led group and the Courses are seeking to develop an e-learning programme using 'Moodle' and 'Adobe Connect' systems.
- 5. Prior to the inspection the Senior Inspector met with the Principals of the Courses, and during the inspection also met with the Bishops of three of the Dioceses, the Chairman of ERMC, one of the two Methodist Chairs of the region, and received written comments from two other Diocesan Bishops. Members of the inspection team consulted the Chairmen of the two Diocesan Courses, one of whom is also Chairman of EIDMC. The Inspectors were able to visit two residential weekends when all three Courses were present, with the Reader

candidates attending as day visitors on the Saturdays. They also visited individually a number of the training sessions at Norwich and St Albans, some of the local training groups in St Edmundsbury and Ipswich Diocese, and also some of the sessions designed primarily for Reader candidates in other centres in St Albans Diocese. This gave many opportunities for Inspectors to discuss with students and staff and the Methodist inspector met with the Methodist students at one stage in that connection as well.

- 6. There are currently 48 students training with ERMC, 44 for ordained ministry in the Church of England and 4 for presbyteral ministry in the Methodist Church. In addition St Albans Diocese in partnership with ERMC in offering training for 25 students preparing for Reader ministry, and courses are offered for them at St Albans as well as for ordinands on ERMC. NDMC has 22 students, of which 15 are for Reader ministry and 6 for OLM, but 10 of the ERMC students attend the Norwich centre with the NDMC students. NDMC is also involved in post-ordination and post-licensing training and has 51 such students. EIDMC has 20 students, 16 for Reader training and 4 for OLM.
- 7. The Courses face some very major challenges. The funding questions that apply to all theological education are a major issue, and the specific problems of the loss of HEFCE funding for Anglia Ruskin University (which is dealt with more fully in the Inspection Report on the Cambridge Theological Federation) is a disturbing background for all the Courses. The reduction in numbers in students on ERMC in recent years, partly because of a reduction in numbers of candidates coming forward from the dioceses served by the Course but also because of the increased availability of other forms of training are reasons guite outside the Course's control, but this has resulted in a significant loss of income, which in turn has led to staff reductions. The review of the national provision of training by the Methodist Church in 'A Fruitful Field', published during the course of the inspection, raises yet further uncertainties about the nature of Methodist involvement in the future. The small size of the year groups on the two Diocesan Courses inevitably raises questions about their viability, particularly for EIDMC. NDMC is partly shielded from this by the presence of ERMC students at Norwich but it is still has a small number of students. The departure of the Principal of EIDMC in the summer of 2011 and the possible move of the Acting Principal in the near future coupled with a major review of EIDMC within a Diocese facing a need to cut its overall budget makes this a particular period of uncertainty for that Course.
- 8. We were therefore very impressed by the positive spirit shown in the sessions we observed both in small teaching groups, in the centres that are used at St Albans and Norwich, and at the residential weekends. The overall impression we gained was of a community at ease with itself, positive in its commitment to preparing men and women for a variety of ministries, and engaging creatively with an educational programme that they found demanding yet fulfilling. It is to the staff's great credit that they have maintained that spirit despite the other major challenges they face.

9. Inevitably there are some matters that we thought could be done better, and we record a number of areas where we have confidence with qualifications and one area where, at present, we have no confidence. But this should not detract from the general impression that these courses are well served by very dedicated and committed staff and are fit for purpose.

## SECTION ONE: AIMS AND KEY RELATIONS

## A Aims, objectives and evaluation of the institution

Inspectors will consider to what extent the declared aims and objectives, strategies and policies of the institution correspond to the needs of the churches, to the institution's own curriculum proposals and to accepted public and legal criteria.

- A.i The aims and objectives of the institution should be appropriate to the preparation of ordinands for public ministry within the breadth of traditions of the sponsoring church.
- 10. The Aims and Objectives of the ERMC are explicitly set out in the opening pages of the Course Handbook and pervade other course literature. The Course is very clear about its ecumenical context and objectives and about its inclusivity with regard to the varying traditions that contribute to the breadth of its sponsoring churches. Its aims and objectives are certainly appropriate for the Course.
- 11. The Aims and Objectives of the NDMC reflect the fact that they serve an Anglican diocese, but they include within that the need to give an ecumenical dimension to their vision of ministry. They are appropriate for an Anglican Diocesan Course.
- 12. The Aims and Objectives of the EIDMC, although stated differently from those for NDMC, include developing a close partnership with the other two courses, which implies rather than states recognition of the ecumenical dimension. However, they too are appropriate for an Anglican Diocesan Course.
- 13. Different dioceses of the Church of England emphasise different aspects of Reader ministry and have differing visions for its expression; inspectors noted that the courses aim to prepare 'ministers' for participating churches, but observed little differentiation in formation of lay and ordained ministers other than in the Formation for Ministry groups. We understand more happens in the January residential weekend. (See paragraph 26)
- A.ii There should be evidence that the current, published statements on training policy produced by the various denominational bodies have been suitably integrated into the training programme.
- 14. The Learning Outcomes for both Anglican and Methodist Churches published in *Shaping The Future* are clearly related to the outlines of the ERMC and the NDMC published in the ERMC Handbook or Appendix to the Inspection Questionnaire for NDMC (although note paragraph 26). It is less clearly stated in the EIMDC material. Tutors and students are aware of how relevant learning outcomes are to be achieved through a combination of academic courses,

residential programs, staff contacts and local church or other contexts. These learning outcomes are also clearly related to those published in module handbooks.

- A.iii There should be evidence of action taken in response to the previous inspection report and any follow-up.
- 15. There is evidence of action taken following the inspection report of what was then known as the East Anglia Ministry Training Course in 2004, with an earlier introduction to Theological Reflection and revision of Module Booklets. Inspectors were generally pleased with the response to previous inspection reports and moderation comments, given the extensive changes and challenges that the Course has seen faced since the 2004 inspection. Inspectors were, however, not convinced that concerns about Corporate Worship have been adequately addressed and the 'blandness' referred to in the 2004 Report seemed still to be evident in the Church of England liturgies which appeared to be only loosely based upon the structures of Common Worship and sometimes failed to incorporate core texts. (See Section E)
- 16. The last inspection of NDMC was in 1999, with a follow-up in 2001. Developments in the Course, including its involvement with ERMC and the CTF, mean that the recommendations of the 1999 report are now irrelevant.
- 17. EIDMC's links with the other two courses became effective from the Summer School of 2010, which also means that such developments have overtaken the recommendations made in the previous Inspection Report.

The inspection team has confidence with regard to Criterion A, Aims, Objectives and Achievements of the Institution.

## B Relationship with other institutions.

Inspectors will examine how the institution relates to other educational provision (including any partner university) and to the churches and secular organisations in its locality, with particular reference to regional groupings of providers of theological education.

- B.i The terms of academic and validation/accreditation arrangements with universities should be fair and appropriate to an institution offering training and formation for candidates for ordained ministry.
- 18. Academic qualifications are validated by Anglia Ruskin University (ARU) as part of that University's relationship with the Cambridge Theological Federation (CTF). The relationship of the University to the Federation is examined in greater

detail in the Inspection of the CTF, but it appears fair and appropriate for ERMC and the two Diocesan Courses.

- B.ii The institution should show signs of drawing as much benefit as may be possible from the demands and resources of universities in teaching quality assessment, staff development and the promotion of research.
- 19. The University provides resources for all of these in collaboration with the Federation and much of this is covered in the Inspection of CTF. All such facilities are available to the Courses' core staff, although time pressures makes undertaking much in the way of research very difficult.
- B.iii There should be evidence of effective engagement with churches, other faith communities and secular organisations in the locality such as to enhance preparation for public ministry.
- 20. This engagement happens through the use of a wide variety of placements for students; in churches for all three Courses and in secular institutions for ERMC and NDMC. The effectiveness of those contacts is established both by the comments of those involved in providing supervision on such placements and by the assessments of students' performance on them, which is generally high. A module on Exploring World Faiths enables students to encounter other faith communities.
- B.iv The institution should demonstrate commitment to effective partnership with the other providers of theological education in the region.
- 21. This is a many faceted and complex aspect of the life of these Courses. First there is the relationship of ERMC, which trains ordinands from six English Dioceses and from the Diocese of Europe, and the two diocesan courses. The link with Norwich is more long-standing than the one with St Edmundsbury and Ipswich, and the Principals, Staffs and Councils are to be commended on the way in which the three way relationships have developed positively. There must now, however, be a question on whether the complexity of relationships between three courses, the small numbers on the diocesan courses, particularly on the EIMDC, and the duplication of work involved with a three course structure, means that they should move to a further stage so that they become in time one Course, with one core staff and one Council.

There are complicated issues to consider:

 The use of centres. All of the NDMC and half of the ERMC students meet weekly in centres at St Albans and Norwich, but most of the St Edmundsbury and Ipswich students whether on the Diocesan Course or ERMC meet in local smaller tutorial groups from that Diocese, while some students not able to get to any centre or tutorial group train with local individual tutors. This inevitably applies to those from the Diocese of Europe. We were told that the creation of a centre in St Edmundsbury and Ipswich, while difficult is not impossible, (See Section G) and the use of a centre in Cambridge may also be a possibility. But there would still be some students in the Diocese of Europe if nowhere else who would need some form of more dispersed training;

- NDMC is more involved in Continuing Ministerial Education than the other two Courses, although it would be quite possible for a single course to have a bespoke relationship with each of the Dioceses in the Region;
- The relationship of the Courses to Reader training. The two Diocesan Courses are both at the moment committed to training OLMs and Readers together for much of their training. ERMC is in partnership with St Albans Diocese in training Readers for that Diocese, and all the Readers from those Dioceses have qualifications that are therefore accredited by ARU. Ely and Peterborough Dioceses do not have OLMs and train their Readers separately. The financial consequences of training Readers through ARU may become greater because of the University fees that may fall on the participating Dioceses, but the advantages of training Readers and Ordinands together may also be considered great enough to justify that expenditure.
- 22. We believe that these issues are not insurmountable, and that the reasons given in paragraph 21 are sound ones for reviewing the training provision by these three courses in the region.
- 23. The three Courses are all linked to the Cambridge Theological Federation, and they have a distinctive character in that they are all focussed on the region while many of the other member institutions in Cambridge have a national or even international focus. Within the Cambridge Federation there are very initial discussions between Westcott House and ERMC about the possibility of some joint working, which should be a partnership between two equal bodies for their mutual benefit rather than any take over of one by the other. We believe there may be much that might be positive from such a relationship and certainly the presence of a Cambridge teaching centre might be of benefit to those students of ERMC who are in reach of Cambridge where there might be the possibility of using some of the other teachers in the Federation and in the Cambridge University Divinity Faculty.
- 24. ERMC also plays its part in the Regional Training Partnership. The nature and role of the RTP is beyond our remit but meetings with some of the regional bishops did reveal some dissatisfaction with its present role despite the admirable initiative it has taken in obtaining funding to investigate lay training in

the region. Some bishops wondered whether the RTP was either effective or even needed.

25. We therefore believe there is a network of issues here which the Courses could play a part in bringing to the attention of the Regional Church Leaders. Accordingly:

#### **Recommendation 1**

We recommend that the three Course Principals and the Chairmen of their Governing bodies continue their discussions with the Regional Bishops and through the Chairs of the relevant Methodist Districts with the Methodist Church to investigate whether and when a move to a single Course for the whole region would be practicable, efficient and prudent and what its relationship should be to the Regional Training Partnership.

The inspection team has confidence with qualifications with regard to Criterion B, Relationships with other institutions.

# SECTION TWO: CURRICULUM FOR FORMATION AND EDUCATION

#### C Curriculum for formation and education

Curriculum advisors will consider the proposals for the curriculum to be offered by the training institution in the coming years against the policy statements of the relevant sponsoring churches. They will evaluate the formational and educational principles and design of the proposed programmes including their assessment proposals.

- C.i The institution should offer a theological rationale for its approach to mission and ministry consistent with the principles of the churches for which it trains ministers and for the education it offers other groups of learners.
- 26. The handbooks of the Courses are clear in their theological rationale for mission and ministry. There is some differentiation made in the various documents between training for deployable ordained ministry, local ordained ministry, and Reader training, more so in the NDMC handbook and in the St Albans reader training handbook than in the EIDMC handbook, which reflects the range of ministries for which people are training on that course. The incorporation of the learning outcomes for clergy and particularly the new outcomes for Readers will strengthen the formation for public ministries lay and ordained. We *urge* that any future revision of the handbooks should address this matter.
- C.ii The institution should offer a formational and educational rationale for its approach to ministerial training and for the education it intends to offer to other groups of learners.
- 27. The overall design and appropriateness of the curriculum shared with the CTF is commented on in the report on the inspection of the CTF. There are well produced handbooks for the course and the schemes which give a clear rationale for the training of various ministries and for lay learners. Again it is one of the strengths of the institution that this has been carefully done in a way that is clear to the learners on the courses.
- C.iii The institution should offer a set of programmes which will enable candidates to be prepared for their envisaged ministries, in line with the developing policies of the sponsoring churches, and appropriate programmes to educate other groups of learners.
- 28. The curriculum as thought through in light of the criteria tries to balance the requirements with time commitment and resource availability. Overall this is done in a skilful way to enable candidates to achieve either a Foundation Degree or a Certificate of Higher Education. There were some areas that the inspectors thought might be places for improvement which we comment on in the following paragraphs.

- 29. The weekends include a special topic which is not part of the core curriculum and which takes a considerable part of the program, for example on one of the weekends we observed a whole evening was devoted to Communication Skills, including time spent on such technical matters as designing web-sites. This is no doubt that is an interesting issue but we did not believe it met the learning outcomes identified in either the Anglican or the Methodist Church's requirements, the latter of which states 'Demonstrate a developed understanding of the Gospel and Mission of the Kingdom of God: basic skills of interpretation: ability to relate faith and experience and to begin to think theologically about their context.' The inspectors recommend this use of the weekends be reviewed to provide space for more work on the core subjects for pre-ordination or prelicensing, including their effective communication. In particular the inspectors recommend a review of the doctrine modules such that time be given for what are at present optional subjects in the Further Christian Doctrine Module, although quite possibly examining them in the context of communicating the Gospel. For example, given the centrality of theodicy as a very major issue for many in contemporary society, that could be a subject for a session at a residential weekend and some consideration of how public engagement on that could be effectively communicated.
- 30. Also in the teaching of liturgy more time could given to the history and theology of liturgy so that students may more fully understand approaches to liturgy and worship from their sponsoring churches. It is also important to help students gain a wider understanding of traditions different from their own, and so the opportunity may be taken to give further input on the history and theology of Methodist worship to those training for ministry in the Anglican Church. We *urge* that these possible developments should be carefully considered.
- C. iv The proposals concerning assessment should enable the institution to advise church leaders on the suitability of candidates for the envisaged ministry, in line with the guidelines of the sponsoring churches. Assessment proposals for other groups of learners should be consistent with the aims and objectives of the programmes being offered.
- 31. The policies on assessment are clearly outlined in the handbooks for the institution. There was positive student feedback to the inspectors on the quality and care that was given to this by the staff.

#### Recommendation 2

We recommend that the balance in the weekends between core subjects and special topics be reviewed to give more space to core subjects.

The inspection team has confidence with qualifications with regard to Criterion C, Curriculum for Formation and Education.

## SECTION THREE: MINISTERIAL DEVELOPMENT

## D Community and Corporate Life

Inspectors will consider how the institution understands and structures community life, and interprets the role of corporate life in training for ordained ministry; also how far corporate life is evident in the relationships between members of the institution.

- 32. The network of relationships between the institutions connected to this inspection is complicated, not least for reasons of history. Their coming together has been by necessity evolutionary, and has involved a good deal of negotiating agreements and memoranda of understanding. While the relationships to the Federation and RTP have their own value, community and corporate life is experienced by most students and staff at a regional level through the residential weekends and summer school, and at a local level through different structures of learning, formation and support.
- 33. Our experience of two residential weekends was of a community (or bringing together of communities) that was fundamentally happy and well-ordered. The staff(s) collaborated in teaching, were involved in the small pastoral/educational groups (known as A-G Groups as there are 7 of them and where we noted some good examples of theological and group facilitation) and were at ease and engaged in the dining room and the bar. Students were able to share in some depth in the groups and there was a good deal of prayerful support. The Saturday night community meetings were extremely good-natured and evidenced a community at ease with itself. When individuals were in distress, we observed that they were handled carefully and unobtrusively.
- 34. At the local level, there is a diversity of ways of building and experiencing community and corporate life. The centres in Norwich and St Albans follow the Benedictine principle of eating and praying together (in the cathedral setting); EIDMC roots its students locally (in education and local training groups); Norwich uses Formation for Ministry groups drawn from a whole year group for ordinands and another one for Readers. We saw examples of how each of these contributed both to the sense of being supported but also to the fostering of a collaborative approach to ministry.
- D.i The institution should offer a clear statement of how it understands its corporate life, including issues of gender, ethnic grouping and disability and other matters of natural justice, in a way, which harmonises with its aims and objectives in preparing candidates for public ministry.
- 35. The ERMC handbook has a very clear introduction (by the Principal) to the vision and values of the Course that leads into a section on being a 'community of diversity' that encourages mutual respect and requires the use of inclusive

language and the avoidance of stereotypes. This extends the principle beyond gender and ethnicity to other equally relevant issues of denomination and the distinction between lay and ordained ministries. NDMC has a shorter statement that is nonetheless comprehensive and pays greater attention to disability. All the courses refer to policies of the Federation to which they are committed.

- D.ii The institution should show evidence that the structures, requirements and practice of the institution reflect the stated policy.
- 36. We were impressed by the diversity of the staff in terms of male/female and lay/ordained distinctions. The three tutorial staff members in Norwich include a female principal and a lay Reader. The training day for Local Training Groups in St Edmundsbury & Ipswich was led by an ordained priest, a lay Reader and an OLM all of different style/temperament and academic background. The new vice-principal of ERMC is a Reader. Ethnic diversity is limited, the one black student mirrored by one ethnically African member of staff.
- 37. The number of Methodists on ERMC is small but significant. We saw evidence of how lapses into exclusively Anglican discourse and terminology were pointed out and acknowledged. The Methodist students felt themselves to be valued and respected. It was clear to us that their presence added considerably to the richness of the community and that this was widely recognised. Methodist elements are well-represented in the curriculum (for all) and in the worship.
- 38. Similarly, the inclusion of Readers-in-training in parts of the residential programme seems a natural outworking of the 'community of diversity'.
- 39. The range of academic ability on the courses is in part dealt with through the different learning pathways offered, and considerable care is taken to tailor courses for the individual needs of students. The reflective and formational approach to learning is well-suited to an inclusive learning community

The inspection team has confidence with regard to Criterion D, Community and corporate life.

## E Worship and training in public worship

Inspectors will consider the arrangements for common worship and the policy underlying them, noting the use of the authorized and other forms of worship, and how worship is conducted. Inspectors will note the ways in which ministerial candidates are trained to plan, prepare and conduct public worship.

E.i The spaces designated for prayer and worship should be appropriate for their purpose.

- 40. We observed worship in the residential weekends in the chapel at Belsey Bridge, in a chapel in St Albans Abbey, in the refectory at Norwich Cathedral and in tutorial groups in St Edmundsbury and Ipswich. In each case the worship space was appropriate for its purpose.
- E.ii There should be a publicly stated policy on, and arrangements for, corporate worship. The policy and arrangements should take account of, and equip candidates to work within, the variety of practice within the sponsoring church.
- 41. There is an admirable statement on the principles of corporate worship at residential weekends in a booklet produced by the Course which is clear and comprehensive, and we also saw evidence of their experience of a Book of Common Prayer Eucharist at a residential weekend. Corporate worship was also part of the weekly sessions at the two main centres.
- E.iii There should be a policy concerning balance of worship, including authorized and innovative forms, and of denominational worship in ecumenical situations.
- 42. While the policy in principle was fine we have reservations about its implementation, at least as we observed it at the residential weekends at which we were present. Some of the best worship we observed was from the Methodist tradition, which was very well done, but otherwise at residential weekends there was too great an emphasis on the experimental and the use of worship that appeared to use much of what is often described as 'Celtic' worship, but little sign that Anglican students were being immersed in a culture of the regular use of a daily office as required by Canon B 11 (2) and Canon C 26 (1). The hymnody was almost all modern. One Sunday Eucharistic service was described as being 'in the Catholic tradition of the Church of England' but which appeared to be merely the worship that would be typical of many churches in the centre of the range of Anglican worship. As such we believe the course gave an incorrect impression to the students not just of 'catholic worship' but of where the centre of the Church of England lies. We recognise that many although not all of the students come from the more evangelical end of the spectrum and from churches with a charismatic tradition, but if the Course is to prepare both Anglican ordinands and Readers for the reality of the Church of England across the board we do not believe the practice we saw at the residential weekends achieves this.

#### Recommendation 3

We recommend the balance of authorised and innovative forms of worship at residential weekends should be reviewed to give greater emphasis on authorised forms and, for Anglican candidates, to prepare them to meet the requirements of Canon Law in daily worship.

- E.iv There should be a policy about expected attendance at public worship and evidence of its outworking.
- 43. The policy is to expect students always to attend public worship and as far as we could judge this was observed.
- E.v In the light of preparation for public ministry, there should be provision to address the tension between worship as an activity of the Church and as a vehicle of professional training.
- 44. As indicated in the comments in paragraph 42 at the residential weekends we observed too much of the public worship was geared to the desires of the individuals devising and taking the service rather than to the obligations on public worship in many parish churches as expressed in Canon Law.
- E.vi The institution should have a policy, available to candidates, on training in public worship. It should ensure that candidates plan, prepare, and effectively conduct public worship, including preaching.
- 45. Each of the Course handbooks gives a stated policy on training in public worship, which includes students being given feedback on services they have created and led. The feedback on preaching comes primarily in their own churches and circuits and students are encouraged in groups to hear one of their fellow students preach and to give them feedback. We saw no examples of that, but from the comments of students we believe it happens. There was surprisingly little in each of the Courses' formal responses to the Inspection Questionnaire on training in preaching. At the residential weekends it is normally staff who preach and students are given good examples of preaching through that. Short homilies given by students at some of the weekday sessions in Norwich and St Albans were satisfactory.
- E.vii The institution should ensure that the policy is adhered to and that proper oversight is exercised over this part of the programme of formation.
- 46. From the evidence we saw the policies appear to be observed, although we were not able to observe peer assessment of sermons delivered by students.
- E.viii There should be an appropriate policy and practice for reviewing and assessing the leading of worship.
- 47. Review and assessment of the taking of acts of worship is given both orally and in writing, and with a file note on it is kept in the student's file.

- E.ix The students should receive critical and constructive comment, attending to performance, content and process from staff and peers.
- 48. As indicated in paragraph 47 that does happen from staff but we saw no direct evidence that it happens from peer comments. Because of that and because of our comments in paragraph 45 we *urge* that more consideration be given to ensuring critical peer evaluation both of the conducting of worship and of preaching.

The inspection team has confidence with qualifications with regard to Criterion E, Worship and training in public worship.

## F Ministerial, personal and spiritual formation

Inspectors will consider how the institution helps candidates in their ministerial, personal and spiritual formation, and how candidates are encouraged or enabled to deepen their spiritual life and their self-awareness.

- F.i The policy regarding ministerial formation should be easily available and communicated to candidates.
- 49. Policy is spelt out in the various handbooks: p5 (ERMC), p15 (EIDMC) and pp10-11 (NDMC). We observed good examples of this being communicated both to candidates and others (such as local training group members).
- F.ii The institution through its common life and through the way it guides and supervises candidates should enable them to grow in Christian discipleship with a view to exercising a public role in ordained ministry.
- 50. We found that the residential weekends were strongly formational in their approach to teaching. The A-G groups enabled students to bring their current personal and ministerial concerns before others and this was the context in which the weekend's formational theme began to be explored. This reflects the stated formational value in the ERMC Handbook: 'we are committed to... using our minds to think through issues of faith and to using both personal and communal experience as a valid way of doing theology' (pp4-5).
- 51. At the more local level, the different institutions represented make similar use of staff mentors, training agreements and review processes in supporting candidates in their formation and reflection. EIDMC has a greater emphasis on the local: the local training group is responsible for working with candidates on their training agreements, for instance. We observed the initial training day for these groups: reflective practice was well-modelled and those involved were well-motivated for the task. NDMC has Formation for Ministry groups several times a

term alongside its Wednesday training evenings. These are not local but in year groups, Readers and ordinands usually in different groups. An example we observed included discussion of prayer and the spiritual life, reviewing the learning outcomes in these areas in a comprehensive way. ERMC itself has no equivalent year groups, but our interview with one of the tutors strongly suggests that tutorial groups have a key role in personal, spiritual and ministerial formation as well as the narrowly theological.

- F.iii The institution should enable candidates to be immersed in the traditions of their own churches, together with an empathetic understanding of strands other than their own. It should also increase candidates' understanding of the traditions of other churches and deepen their sense of their ecclesial identity.
- 52. The weekends we attended had a strong sense of community, which in itself seemed to help those from different Christian traditions to value and respect each other. Students seemed to be comfortable being evangelical, charismatic, catholic or Methodist, for instance, without the need either to descend to the lowest common denominator in worship or to be defensive in discussion. Anglicans and Methodists were at ease in being immersed in and loyal to, their respective churches at the same time as deeply valuing each other. We noted that the move last year of some of the catholic students into the Ordinariate had been a cause for soul-searching, and we did observe that the catholic tradition was less well-represented in the community than might be expected (or hoped). The ERMC Handbook claims that 'we prepare ministers... with a special regard for becoming instinctively ecumenical' (p5). In both a narrow and wider sense of 'ecumenical' we saw a good deal of evidence that this is well fulfilled.
- F.iv The institution should provide corporate and individual guidance and supervision for candidates. There should also be encouragement to seek confidential spiritual counsel.
- 53. Each student has a staff mentor and a local church supervisor. At least once a year the three meet together. All the institutions encourage the use of a spiritual director (Norwich requires it).
- F.v The institution should enable candidates to reflect on the breadth of Christian spiritual tradition and its engagement with the world, and to work with the personal issues arising out of the whole process of training.
- 54. The formational themes at residential weekends include two that focus on spirituality. (NDMC and EIDMC students also include spirituality in their separate residential programme). Personal support is provided by staff mentors, chaplains and through the formational groups. The handbook also states that 'we prepare ministers who can be attentive to the world through making missionary

connections between faith and wider life – this is about reading the signs of the times' (p5). Whilst we were impressed by the contextual nature of much of the theological reflection, we considered that sometimes the connections were being made more from faith to life than from life to faith and thought it possible that the need to make 'missionary connections' trumped the foundational need to be 'attentive to the world'. We *encourage* the Course staff to reflect on that observation.

- F.vi The institution should enable candidates to develop as people, as future public ministers and as life-long learners, able to look forward to working effectively in the context of traditions other than their own, both within and beyond their own church.
- 55. The annual training agreement involves student, supervisor and staff mentor (EIDMC: local training groups) working together each year to identify areas for vocational growth (taken from a comprehensive list in the ERMC Handbook, pp37-9).
- F.vii Candidates should be encouraged to make time for private prayer and to explore the expectations on the ordained in the areas of corporate and individual prayer, of general conduct and of lifestyle.
- 56. Issues about time for private prayer and expectations on the ordained are included in the Development of Life & Service module, in sessions on transitions into ministry on the January and June weekends during the final year of training, and we gather at the start of training for EIDMC and during the final year of Formation for Ministry Sessions for NDMC, but see our comments in paragraph 42.

The inspection team has confidence with regard to Criterion F, Ministerial, personal and spiritual formation.

## SECTION FOUR: EDUCATION AND TRAINING

## G Teaching and learning: content, method and resources

Inspectors will attend a representative sample of different teaching and learning activities, noting their quality and effectiveness and the methods used. They will examine the adequacy of educational resources and libraries, and will look at samples of students' written work. They should report on the full range of educational activities of the inspected institution including provision for other types of ministries and for independent students and auditors.

- G.i Principles concerning what is included in pre-ordination/authorisation training and left to post-ordination training should be available and consonant with any denominational requirements.
- 57. There is a clear statement of the pre-ordination learning outcomes for both Anglican and Methodist students in the ERMC handbook and in their inspection response it is stated that there is regular liaison with Dioceses responsible for IME 4-7 and the equivalent for the Methodist Church 'to ensure a common understanding and smooth progression.' It is readily acknowledged, within the Course Handbook, that the minority of candidates registered as students for less than three years will not have been able to achieve all of these learning outcomes through the ERMC during the pre-ordination training. There is no explicit statement of what is left to post-ordination training or about what is left to the post-licensing phase of a Reader's development, but given the clarity about pre-ordination learning outcomes we have no reason to doubt that the liaison is real and effective.
- 58. There is a similarly clear statement about the learning outcomes preordination for NDMC but again no explicit statement on the principles of what is pursued post ordination for NDMC either, but as the Course is involved in IME years 4-7 for the Diocese of Norwich the transition from pre- to post-ordination training is effectively managed by the Course itself.
- 59. EIDMC has no response to the Inspection Questionnaire on this matter. If the Course is to continue in its present form we *urge* a policy statement on this should be produced.
- G.ii Teaching and learning programmes should serve the aims and objectives of the institution and of the educational programmes of which they form a part. They should demonstrate a proper balance between the academic, formational and practical aspects of training.
- 60. Teaching and learning programs are clearly intended to meet the Courses' aims and objectives. Academic and practical aspects appear to be well-balanced though inspectors have concerns about how effectively the collective worship

contributes to the formation of candidates. (See Section E)

- 61. It is in the nature of part residential courses that much of the formative learning experience is gained on placement or in the training parish or circuit. This necessitates reliable training and placement contexts where reporting is rigorous, illuminating and detailed. This applies particularly to EIMDC. As far as we were able to judge that was provided.
- 62. ERMC also delivers its outcomes through a mixture of course modules, placements, residential teaching weekends, local teaching centres in St Albans and Norwich (and Cambridge, Chelmsford or Peterborough for MA seminars), where there is corporate worship, a shared supper and dispersed learning. There is also some dispersed learning. The residential component allows for workshops and 'clinics' to deal with matters arising from course modules and placements.
- 63. NDMC achieves its outcomes by a combination of the shared weekends and a mid-week evening class in the Cathedral precincts. By the combination of a group meal, worship, access to the library, and classes a strong formational community for learning and preparation the ministry is developed. Observation of this shows a strong emphasis on formation for particular types of ministry lay and ordained.
- 64. The academic component of the EIDMC is delivered primarily through a combination of the shared residential weekends and weekly meetings of Area Education Groups – gatherings of between two and six OLM and Reader candidates with a local tutor. The session that was observed was of a high quality, led by a tutor with considerable experience and academic expertise. The intention is that students should remain within the same group, with the same tutor, throughout their training (although this does not always happen in practice). This arrangement encourages a sense of community in learning, but ideally requires a tutor with competence in all areas. However, because the system is dependent upon the availability of suitable tutors within a particular geographical area, it may not always be possible to find someone with sufficient knowledge and skills to do this, and this might be thought to be a potential weakness, although we saw no definite evidence of that. Even though students are widely scattered in the diocese, this potential weakness could be mitigated by encouraging the formation of the largest possible groups or even by establishing a single centre for teaching which most students could attend, as is done in the Norwich Diocese. As indicated in paragraph 21 the establishing of a single centre might be possible in the Diocese and it would certainly make the moving to a single course for the whole region far easier to manage.

#### **Recommendation 4**

We recommend that the ERMC and the St Edmundsbury and Ipswich Course should consider the establishing of a single centre for training within the Diocese.

- G.iii Units of teaching and learning should have clear and appropriate aims, be well structured and enable students to achieve appropriate learning goals.
- 65. The regional module booklets, which are used by all three Courses, have a broadly common house style, and are clear about their aims and intended learning outcomes for each teaching session. Modules are closely related to the overall learning outcomes required by sponsoring churches. Inspectors were confident in the stated aims of the teaching programme.
- G.iv Teaching programmes should introduce students to the appropriate knowledge and learning processes, while drawing on student experience.
- 66. Students are introduced to appropriate knowledge through some variety of teaching methods and individual styles. There is evidence of lecture, seminar, dialogue and group work with considerable support from projected Power-point material. Nevertheless we had some evidence from student comments that the academically-gifted student would have benefitted from being a little more stretched at times, whatever the educational method. We *urge* that some consideration be given to their needs by the Course staff.
- G.v The educational methods employed, and the balance of methods within the educational programme, should underpin the stated aims of the programme.
- 67. Inspectors witnessed teaching sessions in a variety of contexts, both at residential weekends and in regional centres. There were examples of very good teaching and engaging presentation of material but there were also examples of poor teaching and inappropriate use of time within teaching sessions. One poorly-structured lecture of 90 minutes duration appeared to us not to be an effective way of teaching, an impression confirmed by some student comments afterwards. Nonetheless overall the good certainly outweighed the poor. We make a recommendation below about the continued and vigorous use of appraisal, evaluation and peer-review processes to ensure the best standards apply in all teaching sessions. (See also paragraph 83) We further believe that those requirements of appraisal, evaluation and peer review should be as thoroughly applicable to sessional and local tutors as well as to core staff.

#### **Recommendation 5**

We recommend continued and vigorous use of appraisal, evaluation and peer-review processes to ensure its best standards apply in all teaching sessions.

68. Contact time with students is at a premium and this can engender a sense of relentless busyness when students are gathered, especially at Residential Weekends. The need to encompass broad areas in single teaching sessions

necessarily leaves students with a great deal of independent work to follow up subject matter raised at only a basic level. A wide range of academic ability is represented among the student body and some struggle to achieve an advanced understanding of material initially presented or introduced in a teaching session.

- 69. As already commented on, Inspectors consider that too much 'general' material is covered over weekends which constitute prime teaching opportunities. Material is sometimes only thinly covered or poorly presented, leaving too much to individual private study. (See Recommendation 2)
- G.vi Teaching programmes should be complemented by structured opportunities for students to learn, as individuals and as groups.
- 70. Where students are able to attend group sessions either at one of the teaching centres or in local groups such opportunities are provided. It is more difficult for the dispersed students who are unable to meet with a tutorial or other group. The development of 'Moodle' and Adobe Connect e-learning may be a very helpful way forward and the Courses are to be congratulated in experimenting with it. There are some significant teething problems with the technology that have yet to be fully resolved and some students are not particularly 'computer literate', so the careful review of the introduction of these methods that is planned is obviously essential. It was suggested to us that a possible limitation of such teaching methods is that they are more likely to be effective in imparting knowledge that in any more formational outcomes, but others with wide experience of this type of technology would disagree. We can simply *encourage* the Course to continue with the experiment, to review it carefully and to share its experience with others engaged in theological education.
- G.vii Staff should provide formal and informal feedback to students and assessment of work and of candidates' progress, both in terms of academic progress and in terms of preparation for beginning public ministry. There should be both affirmation and constructive criticism, as appropriate, of students and of work.
- 71. Inspectors considered that tutors generally offered appropriate feedback to students both in respect of written work and placements undertaken in preparation for public ministry as evidenced by the marked papers the inspectors were able to read and from conversation with students..
- G.viii Published assessment criteria should be used by the teaching staff and be available to students.
- 72. Assessment criteria for academic modules is published in module handbooks as is material to enable supervisors and assessors to make their judgements. Staff and students have access to pro-forma assessment sheets for placements and preaching engagements.

- G.ix The educational programmes offered should be supported by an appropriate learning environment. This should include adequate provision of resources, library and ICT, placements and practical opportunities to learn.
- 73. Venues used for regular teaching sessions and for Residentials are varied but generally very good. The space, comfort, lighting and equipment are generally appropriate and particularly so at the Belsey Bridge Residential centre.
- 74. Core text books are on sale at the bookstall during Residentials and students of the Courses have access to the Course library based at the Belsey Bridge Conference Centre, the Hudson Memorial Library at St Albans Abbey, The Emmaus House and Cathedral Libraries of Norwich, the St Edmundsbury Cathedral Library and the libraries of the Cambridge Federation including the libraries of Ridley Hall, Wesley House, Westcott House and Westminster College. The combined libraries of the participating institutions of the ERMC and the Cambridge Federation offer enviable facilities and problems are more likely to involve travel and access than inadequate material and students have to plan their reading lists carefully. Bibliographies contained within Module Booklets are essential to planning of individual academic work. There are also digital library resources available via Anglia Ruskin University. The library at Norwich Cathedral is particularly valued by the students on NDMC and has been purchasing new books to keep up-to-date. The Course Handbooks offer useful information about library facilities and how to use the Postal Library Service based in Cambridge.
- 75. Some Courses module booklets (e.g. Introduction to Pastoral Skills) are in presentation at variance with those produced on the FedNet website. Whilst there is need for some material which is specific to the regional Courses, it is suggested that a closer semblance through common nomenclature, headings and style, for example, would make the FedNet material more useful.

The inspection team has confidence with qualifications with regard to Criterion G, Teaching and learning, content, method and resources

## H Practical and pastoral theology

Inspectors will consider the way in which the institution understands the relation between theory and practice, how it enables students to develop skills in their integration, and how the overall programme of training is effective in preparing candidates for ordained ministry or other vocational pathways.

H.i The training institution should have a policy on how the curriculum integrates theory and practice and should communicate it to students.

- 76. There is no single policy document relating to how the Courses' curriculum integrates theory and practice, but there is an explanation of its methodology within the Course Handbooks both within the Introduction and the section concerned with the aims and objectives of the residential sessions. Theological reflection, which fosters integration, is strongly encouraged at many points in teaching sessions.
- 77. The Formation for Ministry Groups in NDMC are also intended to meet the requirements for integration, and the EIDMC response to the Inspection Questionnaire also quotes a number of parts of its Handbook.
- H.ii The structures for learning courses, seminars, groups, placements, private study, marking, feedback should be configured so as to facilitate this integration.
- 78. The system of teaching sessions, placements, feedback and 'clinics' are so established as to integrate theory and practice. This integration is demonstrated and, to a degree, enhanced by the course handbook's table of how a student can expect to achieve the learning outcomes during their period of training. The Inspectors were able to read and observe the marking of some course work, which was completely satisfactory.
- H.iii The institution should demonstrate how it is enabling candidates to develop an appreciation of the pluralist and multifaith/cultural society in which we live. There should be evidence in the work of students that they are becoming theologically reflective practitioners within it.
- 79. Inspectors were mindful that the learning contexts of some parts of East Anglia do not manifest the same high degree of multifaith/multiculturalism as other parts of England, although good attempts are made to address these issues through the taught aspects of the Courses. From the approach of some students there was some concern among inspectors as to the extent to which in practice students are being prepared more for chaplaincy to Christian communities than to a representative ministry of the Church to a wider society which includes not only other faith communities but significant numbers of people of no faith. That is certainly not the stated policy of the Course and may simply reflect an impression made by some of the students, but we *urge* the Course staff to reflect on that impression.

The inspection team has confidence with regard to Criterion H, Practical and pastoral theology.

## SECTION FIVE: STAFF AND STUDENTS

## I Teaching Staff

Inspectors will consider the provision of teaching staff and the policy underlying it, the procedures for appointment of teaching and other staff, and provision for staff development.

- I.i Appointments should involve appropriate consultation with the relevant sponsoring churches and partner institutions, and the method for making appointments should be clear and fair to all concerned.
- 80. Appointments for academic staff to ERMC are overseen by the Council. Representatives of the Council, the Federation and the students are present at all appointments. Appointments for NDMC and EIMDC are governed by diocesan criteria with representation from the Diocesan authorities and from the staff of the partner training institutions.
- I.ii Recruitment and selection should be in line with current good practice. Job descriptions and conditions of service should be clear at the time of appointment and should be revised at regular intervals.
- 81. The appointment processes appear to meet the requirements of current good practice including in the provision and revision of job descriptions. The last person appointed to the ERMC full-time staff spoke warmly of the process and its implementation.
- I.iii The number, field of expertise, scholarly and teaching competence of the staff should enable the educational programmes of the institution to be offered at the appropriate levels, both in terms of academic achievement and of preparation for public ministry.
- 82. The fields of expertise offered by the staff are as wide as could be expected from a small staff, but the quality of teaching we observed varied. Some was of a very high standard and showed a high level of teaching competence by the use of a variety of different educational methods, but others was less satisfactory. (See paragraph 68 and recommendation 5). EIDMC depends more heavily than the other two courses on the use of local tutors, and the variety of quality there is probably inevitable given that structure.
- I.iv The gender, lay/ordained and denominational balance among staff members should enable the institution to offer appropriate models of learning and of ministry, and should comply with denominational guidelines. (For Church of England Guidelines see Appendix F.)
- 83. The ERMC Course has a good balance in its staff in terms of gender, denomination, lay and ordained and using OLMs and Readers in teaching. The

two diocesan courses are for Anglicans and that is reflected in their teaching staffs, but otherwise the balance within them is good, although EIDMC is undergoing major changes in its core staff at the moment.

- I.v The institution should have in place an effective framework and programme for the continuing professional development of its staff. All staff are to have annual appraisals.
- 84. All staff, both full time and part time have a regular annual appraisal and we are assured all engage in the professional development offered through the Cambridge Theological Federation. Occasional staff have an appraisal from time to time as is deemed appropriate by the Principals, but as indicated elsewhere we believe this needs to be developed. (See paragraph 68 and Recommendation 5)
- I.vi Staff should model an appropriate pattern of spirituality, continuing learning and reflection on practice.
- 85. Staff fully participated in all acts of worship and appeared fully engaged with and committed to the values of the Course including its spirituality. They strongly encourage theological reflection and the nature of that encouragement could only come from their practicing it themselves. Continuing learning is covered by the comments in paragraph 85.

The inspection team has confidence with regard to Criterion I, teaching staff.

## J Ancillary staff

Inspectors will consider the provision of administrative, support and domestic staff, the policy underlying it, and procedures for their appointment.

- J.i There should be an adequate number of ancillary staff for the type of institution and its way of working.
- 86. ERMC's resources permit the funding of only one full time ancillary staff post; additional support services such as finance and IT are procured from Wesley House. NDMC and EIMDC are supported by their own team of administrators and draw on support services provided by their Diocesan offices. The ancillary staff support their courses individually and co-ordinate the joint programmes as required. Collectively there is an adequate number of ancillary staff for the type of institutions and their way of working.
- J.ii The institution should establish and make known clear lines of responsibility and accountability for its administrative staff.

- 87. All administrative staff report to the Principals of their respective courses. They each have job descriptions and are clear as to their roles and responsibilities.
- J.iii Recruitment and selection should be in line with current good practice. Job descriptions and conditions of service should be clear at the time of appointment, be revised at regular intervals, and include opportunities for professional development. Staff contracts should be provided.

  Appropriate professional development and appraisal should be provided in line with I.v above.
- 88. Job descriptions were recently updated and staff contracts with clear terms and conditions were provided. Ancillary staff members participate in the same appraisal process as tutorial staff. Each of the Courses has a staff development fund which is used to fund appropriate professional development.
- J.iv The institution should ensure that ancillary staff know how they can contribute to the decision-making processes of the institution.
- 89. Staff meetings are the forum at which all staff can contribute to the decision making processes. At ERMC, staff are represented on the Council by the Vice Principal. The Diocesan courses are overseen by Management Committees with varying degrees of representation at Diocesan decision making bodies.

The inspection team has confidence with regard to Criterion J, Ancillary staff.

#### K Students

Inspectors will examine procedures for admission and suspension or dismissal, for assessing progress during training, and for ministerial candidates, for reporting to the sponsoring church and for supporting candidates in finding their first appointments.

- K.i Written information for students about admission, welfare, complaints, discipline, assessment, reporting to sponsoring churches and arrangements for first appointments should be publicly available.
- 90. Written documentation in these areas is found in student handbooks and on websites. The handbooks serve as the main guide for students about welfare, complaints, discipline, assessment, reporting to sponsoring churches. Students are provided with support through their own student network, tutor groups, staff mentor, course chaplains, and supervisors. During the inspection one former ERMC student was interviewed to confirm they were adequately briefed about the type of teaching ERMC offers (distance and computer based learning etc) although considerable adjustments were required of all students in the first term.

Initially everybody felt unsettled as it was a new experience for all although students quickly formed their own support networks and settled in. OLMs and Readers return to their home parish as a first appointment policy. First appointments are carefully handled.

- K.ii The institution should show evidence of compliance with its own policies, and denominational policies where they exist.
- 91. Feedback from Anglican students indicated that they were satisfied with the process of finding appointments and Methodist students were satisfied with the process of interacting with the South East regional Oversight Committee through to stationing. They also indicated a satisfaction with welfare and dealing with any complaints.
- K.iii The decision-making structure of the institution should enable students to take an appropriate part in the institution. Students should take responsibility for their own participation in the institution.
- 92. Each Course has an elected student representative and all students are aware who their rep is. Three student representatives are invited to attend ERMC Council meetings. Students are encouraged to bring any issues to their staff reps who have an opportunity to bring them to Council meetings which take place thrice a year. There are governing bodies in the Diocesan schemes with student representation. Each of the Courses' review committees has student representation.

The inspection team has confidence with regard to Criterion K, Students.

# SECTION SIX: GOVERNANCE, MANAGEMENT AND FINANCE

- L Governance, management, constitution and organisation
- Inspectors will examine the role of the governing body and other bodies in the oversight and administration of the institution, taking particular note of the way decisions are made and implemented at different levels of the institution.
- L.i There should be evidence of effective financial, administrative and management structures that facilitate the stated aims and objectives of the institution.
- 93. The ERMC is governed by a Council consisting of trustees of the charity who are also directors of the company. The Council consists of representatives from each of the churches/ Diocese served, mostly Directors of Ordinands. Although not Directors or Trustees of the Council, Staff and student reps are invited to attend Council meetings, are full members, report and fully participate..
- 94. The Council's Programme Review Committee oversees formational and academic standards of students in training. We were impressed by the effective way that was handled. The Council has delegated authority to prepare and manage budgets and finance to a Finance sub-group consisting of two trustees/directors, the Principal and part-time Finance Manager. Day to day conduct of the ERMC's activities is delegated to the Principal to whom all staff report. However, at the Council meeting attended by inspectors although a paper did ask for some judgements to be made on financial priorities that request was not responded to. We did not see any evidence of the financial future being critically examined, although written evidence suggested that had happened on other occasions. None the less we found it very surprising that at the one Council meeting attended by Inspectors such a critical matter for the Course was ignored. See Recommendation 7 below.
- 95. The Diocesan courses are governed by management committees with oversight by the Bishop's Council of the Diocese. The NDMC has greater representation at Diocesan levels than EIDMC by virtue of its position within the Diocesan structures. The Inspectors were not able to attend meetings of the management committees.
- L.ii There should be evidence of a structured contribution made by the student body so that it plays an effective role in decision-making processes.
- 96. Student representatives are encouraged to attend ERMC Council meetings and Diocesan management committee meetings. A report is presented on behalf of students at each meeting of governing bodies.

- L.iii There should be evidence that tutorial and ancillary staff are able to fulfil their job descriptions both individually and corporately and are resourced to do so.
- 97. Tutorial and ancillary staff are able to fulfil their job descriptions both individually and corporately and are resourced to do so. In particular, the ERMC staff development fund is used for personal development and staff study identified through appraisal and feedback.
- L.iv There should be a well-designed and operative appraisal system for all staff.
- 98. All staff receive an annual appraisal. At ERMC the documentation and process used is the same as that of the Cambridge Theological Federation ('CTF'). The Diocesan courses follow the common appraisal processes in their respective Diocese.
- 99. Staff appraisals are however limited to staff on the payrolls and the evidence of review of sessional staff was limited to course evaluation and feedback from students, possibly, but not inevitably, leading to appraisal. (See paragraph 68 and Recommendation 5)
- L.v The training institution should meet the current legal requirements, including fire prevention, health and safety, safeguarding, charity registration, immigration and any other current legislation.

# Fire prevention/ health & safety:

100. The courses are delivered in a number of locations. Most courses are delivered at premises maintained by other organisations. Accordingly reliance is placed on the fire prevention and health & safety measures of providers of accommodation.

## Safeguarding:

101. The ERMC policy booklet section 6 (Child and Vulnerable Adult Safeguarding Policy) states that they 'will require the enhanced disclosure certificate from the CRB...to check on the background of tutorial staff, ordinands and independent students and may require the same of support staff.' As Ely Diocese runs the payroll and is a body that will be registered with the CRB to initiate checks they may have done so, but there was no evidence of CRB checks on staff being made on appointment in the staff file that was examined by the inspector investigating this nor renewals every three years. We recommend below that this be investigated further and that if no checks have been made they should be instituted immediately.

# Charity registration:

102. Returns to the Charity Commission and Companies House had been submitted on time, which is a considerable improvement on prior years.

# *Immigration:*

103. At ERMC there was no evidence of checks of identity or right to work in the UK on appointment of staff. We recommend that copies of staff members' passport are stored in personnel files as proof of identity and right to work in the UK.

## Data protection:

104. Student records are maintained electronically with adequate back-up arrangements and restricted access.

## **Recommendation 6**

We recommend that enhanced CRB checks on ERMC staff should be checked and if not in place should be instituted immediately and evidence on the right to work in UK for foreign nationals on the staff should be available.

The inspection team has confidence with qualifications with regard to Criterion L, Governance, management, constitution and organisation.

# M Business planning and risk management

M.i The inspectors should be satisfied that the governing body has clearly identified its role in policy formation and delegation of authority in the areas of business planning, risk management and financial policies.

105. As stated in paragraph 94 the Governing Body of the ERMC has delegated policy formation and authority in the areas of business planning, risk management and financial policies to its Finance sub-group. However it has not provided the strategic direction and input required. Thus, reactive measures as evidenced by minutes of council meetings and interviews with staff were necessary when the 2010/11 business plan was not achieved. If the 2011/12 business plan is not delivered it will be necessary to make some strategic decisions about the future direction of the Course in six to nine months time. Based on the evidence of the Council meeting that inspectors attended, when the Council failed to respond to a paper submitted by the Principal asking for some guidance on future financial planning, we concluded that too much reliance was being put on the Principal in areas of business planning and risk management. We believe the Governance of the Course should all be enhanced by the presence of members who are able to offer an independent and critical view of the finance and management function of the Councils. We note that the Higher Education Funding Council suggests this should be done by completely independent members on an Audit Committee. We are not in a position to say that should apply to ERMC but the Council should urgently review its committees. their terms of reference and their ways of working, and then the Council's ways of responding to those reports to ensure that independent and critical advice is given and followed up. We believe that review should also apply to the diocesan Course Councils, although because we were not able to attend the management committees of those courses, either because their meetings were outside the inspection period or because Inspectors were simply not available at the time of their meetings, we do not have the evidence to know that it is as weak there as it is in the case of the ERMC Council.

#### Recommendation 7

We recommend that the Councils of the ERMC and its related diocesan courses should review their membership and their committees' membership and terms of reference to ensure that financially and managerially astute advice can be independently offered.

M.ii The inspectors should satisfy themselves that the trustees/directors have carried out a proper risk assessment process to ensure that the institution is not at risk from loss, or claims that have not been identified or for which provision has not been made in the accounts.

106. A risk register for ERMC is maintained and reviewed by the ERMC Council annually. We strongly recommend that the register be updated to include the financial risk to ERMC resulting from changes to funding of higher education and steps being taken to mitigate that risk. The financial risk may compromise the institution's ability to deliver two to three year programmes to students already enrolled on the course.

## **Recommendation 8**

We recommend that financial risks to the institution should be carefully evaluated and regularly updated in the risk register.

M.iii The inspectors should be satisfied that the institution has in place a business plan which identifies the aims and objectives of the institution over the short and medium term and identifies how the organisation intends to meet the opportunities and needs identified therein.

107. The ERMC's operations are almost wholly reliant on a) the block grant from the Ministry Division which has recently been unpredictable and reducing because of its reliance on the numbers of ordinands trained by it and b) the number of Readers that local Dioceses can afford to finance and c) the fees payable to CTF which in turn is dependent on HEFCE funding. The Business plan does not provide for contingency in the event that the budgeted income is not achieved. Consequently, in the recent past the Council has had to take a series of reactive measures to achieve financial balance.

108. The ERMC Business plan 2010-13 did not anticipate declining student numbers, nor significant changes in the funding of higher education. These two developments threaten the institution's financial viability over the short and medium term. In view of the quantum of existing reserves and planned deficit for 2011/12, it is unclear how the ERMC Council will discharge its obligation to deliver two or three year training programmes to new students enrolled in autumn 2011.

109. The Diocesan courses are funded by Diocesan budgets. Whilst this may make them less vulnerable, Diocesan budget deficits have resulted in a review of the St Edmundsbury & Ipswich Course with decisions anticipated by the Diocesan governing bodies in early 2012.

## **Recommendation 9**

We recommend the ERMC business plan should be urgently updated to take account of the likely future student numbers and the need to ensure the viability of the Course over the period of study of students starting this academic year.

110. The issues raised in this section of our report are serious and require immediate action within ERMC. They show a significant weakness in the governance of the Course as well as important individual issues with regard to compliance issues and business planning. We were not able to investigate as thoroughly the finances of the two Diocesan courses as in each case they are far more closely bound up with the overall Diocesan finances, which to some extent protects them. However, as far as ERMC is concerned the inspectors note:

- a) The lack of direction provided by the Governing Body in the area of business planning and risk management (para. 104)
- b) The over-reliance on the Principal in this area as witnessed by the inspectors (para. 104)
- The failure to update the risk register to include the risk to ERMC resulting from changes to funding of higher education and steps being taken to mitigate that risk (para. 106)
- d) The current Business plan does not provide for contingency in the event that the budgeted income is not achieved (para.107)
- e) The uncertainty how ERMC will carry out its obligations to current students in the light of the current levels of its reserves and planned deficit (para. 108).

In the light of these points, the inspectors do not have confidence in these areas as they stand.

The inspection team has no confidence with regard to Criterion M, Business planning and risk management.

# N Financial policies and cost-effectiveness

- N.i The inspectors should satisfy themselves that proper books of account are kept enabling the trustees/directors to determine on a day-to-day basis the assets and liabilities of the institution.
- 111. The books of account for ERMC are maintained on a recognised standard computerised accounts package commonly used by small organisations. Extracts from the package form the basis of accounts presented to the ERMC finance sub-committee and Council.
- N.ii The inspectors should be satisfied that the annual budget planning process correlates to the business plan and is reviewed regularly by the governing body that the financial position of the institution is reported on a regular basis to the governing body and that appropriate and timely action in respect of such reports is taken.
- 112. The ERMC business plan articulates the Council's strategic goals for 2009-13. These goals have been revised at regular intervals and at each annual budget preparation process to allow for the reduction in student numbers and commensurate reduction in income and expenditure. Budgets and financial position of the institution were reported to and reviewed at each ERMC Finance sub-group and notionally at each Council meeting, but note our comments in paragraph 106 and Recommendation 7.
- N.iii The inspectors should satisfy themselves that proper budgets are prepared and that expenditure against these budgets is regularly monitored and reported to the trustees. Authority for virement between budget heads should be properly authorised within set limits and recorded.
- 113. Budgets are prepared for the current financial year and two successive years thereafter which model two scenarios for student numbers. Expenditure against budgets is regularly monitored at Finance sub-group and Council meetings. Budget virements are approved by the Finance sub-group.
- N.iv The inspectors should ensure that the trustees/directors have properly delegated power to operate the bank accounts and to enter into binding contracts to staff members. There should be evidence that these arrangements are regularly reviewed and that the governing body regularly reviews all covenants in respect of any bank or other loan covenants or agreements have been observed.
- 114. The power to operate bank accounts is delegated by the ERMC Council to the Principal who is presently the sole cheque signatory. Presently there are no limits to the Principal's authority and this places an unfair burden on the Principal. It is proposed by the Course that the ERMC Vice Principal be added to the list of signatories with dual signatory for any payment in excess of £750. We

recommend below that a higher limit be imposed by Council such that a commitment in excess of this limit would require a trustee's signature and/ or ERMC Council approval.

- N.v The inspectors should examine the cost-effectiveness of the institution. The inspectors should be satisfied that the institution has in place procedures to ensure that due economy is exercised in respect of the purchase of goods and services. There should be defined limits for authority to purchase without quotations being obtained and the terms and levels of authority for officers and trustees should be clear.
- 115. At ERMC, quotes are obtained for any purchase in excess of £500. Procurement of, for example, IT equipment is made through the CTF. Specially negotiated rates have been obtained from Belsey Bridge for residential courses. We recommended that a higher limit be imposed such that a commitment in excess of this limit would require trustee and/ or Council approval in line with practice whereby commitments of a long term nature (e.g. new staff posts, office equipment leasing) are already approved by the Council.

## **Recommendation 10**

We recommend that the financial limits on cheques to be signed should be urgently reviewed by the Council and that above a certain limit a Trustee's signature should be required.

- N.vi The inspectors should satisfy themselves that the institution provides cost effective education and training when compared to the costs of similar institutions.
- 116. In view of the cost, nature and size of the institutions and the quality of training and formation, the inspectors are satisfied that the institutions provide cost effective education and training. A comparison of costs with similar institutions was not required.
- N.vii The inspectors in making their recommendations should evaluate the expected cost to the institution. The inspectors should state whether in their opinion the institution has the necessary resources to achieve a satisfactory response to the recommendations
- 117. In making their recommendations, the inspectors have evaluated the expected cost to the institutions and concluded that the institutions have the necessary resources to achieve a satisfactory response to the recommendations, although if a decision is taken to use a teaching centre in St Edmundsbury and lpswich Diocese this may incur additional cost.

The inspection team has confidence with qualifications with regard to Criterion N, Financial policies and cost-effectiveness.

# O Reserves policy and statutory liabilities

- O.i The inspectors should satisfy themselves that the trustees/directors can be satisfied that the institution is solvent and the institution has sufficient reserves to ensure that it is able to meet at least 3 months expenditure or such other amount as the trustees/directors have deemed appropriate.
- 118. Presently the ERMC is solvent and able to meet its liabilities as they fall due. However, it did not have at least three months expenditure in reserves at 31 August 2010 nor at 31 August 2011. Furthermore the 2011/12 budget allows for a deficit which is anticipated to reduce existing reserves and there is no contingency.
- 119. Therefore we recommend that the trustees/ directors agree a reserves policy to ensure that the institution has sufficient reserves as they deem appropriate for the nature and size of the institution. At present they have a policy, but they have not stated there by what sum or percentage they can deviate from the goal of three months' liquidity.
- 120. The reserves and statutory liabilities of the Diocesan courses are not separately identified in the Diocesan books of account.

#### **Recommendation 11**

We recommend that the Trustees of ERMC should give careful consideration to their reserves policy to ensure that the institution has sufficient reserves as they deem appropriate for the nature and size of the institution and, if necessary, to take action to bring those reserves to the required level.

- O.ii The inspectors should satisfy themselves that appropriate advice has been taken on VAT and PAYE liabilities and that appropriate controls exist to ensure that any payments made correctly identify potential liabilities.
- 121. The ERMC payrolls are processed by the Diocese of Ely which provides detailed PAYE information to enable potential liabilities to be identified. Advice on taxation matters is usually sought from the ERMC Finance sub-group in the first instance. The VAT and PAYE liabilities of the Diocesan courses are not separately identified in the Diocesan books of account.
- O.iii If the accounts are kept on a computerised system there should be adequate provision to ensure that all data is properly backed up on a regular basis and that adequate backup data is kept offsite.
- 122. The ERMC accounts are maintained on a recognised standard computerised accounts package. Data is stored on CTF servers with regular back ups by the CTF IT officer. The accounts of the Diocesan courses are

subject to the same data security and back-up arrangements as for the Diocesan budgets.

The inspection team has confidence with qualifications with regard to Criterion O, Reserves policy and statutory liabilities.

## P Accommodation

Inspectors will examine the suitability of the accommodation for teaching and residence.

- P.i The teaching and residential accommodation should be fit for the purpose of enhancing the community and corporate life of the institution and of facilitating good adult learning.
- 123. None of the constituent institutions owns its own premises or accommodation.
- 124. The courses share a summer school and five residential weekends at the Belsey Bridge conference centre (ordinands stay for the whole weekend, those training to be Readers are usually present, non-residentially, on the Saturdays). We were present on two of the weekends. We were confident that the centre is of the right size and scale, has adequate accommodation, good teaching facilities, a separate chapel (with good, open, flexible space, though somewhat functional decor and furnishings), and excellent food and dining room. Staff and students feel 'at home' and appreciate having a regular place of gathering and community, though some have to travel quite long distances. Overall, we thought it unlikely that the course could do better and, indeed, that it is fortunate to have such a facility available (for what are very reasonable rates).
- 125. NDMC and EIDMC meet together at Belsey Bridge for a further weekend in January while ERMC meets on its own at High Leigh, Hoddesdon, Hertfordshire. We found that staff and students were universal in finding this a less adequate centre (both in terms of scale and facilities), but it makes travelling there much easier for students from the western side of the area. We note that the course has already reduced the number of weekends there from two to one per year.
- 126. The teaching centres at Norwich and St Albans use facilities at their respective cathedrals. For Norwich, this means that they have access to good teaching rooms and facilities at Emmaus House, a bookshop, library and a place to eat. At St Albans there is also a library; teaching facilities are less good (e.g. using a projector is difficult). There would probably be cheaper alternatives to using these bases but we are confident that the practical and organisational reasons for using the cathedrals are justifiable.

127. NDMC uses office space at Emmaus House and EIDMC has accommodation in Abbey House, Bury St Edmunds. Since the last inspection, ERMC has moved from its offices in Pound Hill to Wesley House. This more central location, close to three other members of the Federation as well as the Federation's office, is clearly a great improvement.

P.ii There should be an awareness of perceived inadequacies, and a policy and programme for addressing them.

128. We are satisfied that the staff are fully aware of the pros and cons of different venues and keep these matters open for review.

The inspection team has confidence with regard to Criterion P, Accommodation.

# CONCLUSION

Overall outcome: The inspection team has confidence with qualifications in the Eastern Region Ministry Course, the Norwich Diocesan Ministry Course and the St Edmundsbury and Ipswich Diocesan Ministry Course for preparing candidates for ordained and licensed ministry.

#### LIST OF RECOMMENDATIONS

#### **Recommendation 1**

We recommend that the three Course Principals and the Chairmen of their Governing bodies initiate a discussion with the Regional Bishops and the Chairs of the relevant Methodist Districts to investigate whether and when a move to a single Course for the whole region would be practicable, efficient and prudent and what its relationship should be to the Regional Training Partnership.

#### **Recommendation 2**

We recommend that the balance in the weekends between core subjects and special topics be reviewed to give more space to core subjects.

#### Recommendation 3

We recommend the balance of authorised and innovative forms of worship at residential weekends should be reviewed to give greater emphasis on authorised forms and, for Anglican candidates, to prepare them to meet the requirements of Canon Law in daily worship.

#### **Recommendation 4**

We recommend that the ERMC and the St Edmundsbury and Ipswich Course should consider the establishing of a single centre for training within the Diocese.

## **Recommendation 5**

We recommend continued and vigorous use of appraisal, evaluation and peer-review processes to ensure its best standards apply in all teaching sessions.

#### **Recommendation 6**

We recommend that enhanced CRB checks on ERMC staff should be checked and, if not in place, should be instituted immediately and evidence on the right to work in UK for foreign nationals on the staff should be available.

#### Recommendation 7

We recommend that the Councils of the ERMC and its related diocesan courses should review their membership and their committees'

membership and terms of reference to ensure that financially and managerially astute advice can be independently offered.

# **Recommendation 8**

We recommend that financial risks to the institution should be carefully evaluated and regularly updated in the risk register.

#### **Recommendation 9**

We recommend the ERMC business plan should be urgently updated to take account of the likely future student numbers and the need to ensure the viability of the Course over the period of study of students starting this academic year.

## **Recommendation 10**

We recommend that the financial limits on cheques to be signed should be urgently reviewed by the Council and that above a certain limit a Trustee's signature should be required.

# **Recommendation 11**

We recommend that the Trustees of ERMC should give careful consideration to their reserves policy to ensure that the institution has sufficient reserves as they deem appropriate for the nature and size of the institution and, if necessary, to take action to bring those reserves to the required level.