STUDENT CAUSE FOR CONCERN POLICY

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Approved by | Chair of Senate Learning and Teaching Committee
               Chair of Senate Research Degrees Committee
Approval date | 9th November 2016
Version | 2.0 Updated Policy to include Prevent Duty. Renamed policy from ‘Fitness to Study’ to ‘Student Cause for Concern’. Changed references to ‘course’ to ‘programme’.
Related policies/procedures | Code of Practice on Free Speech
                                 Data Protection Policy
                                 Equality and Diversity Strategy
                                 Prevent Framework
                                 Student Charter
                                 Student Disciplinary Procedure

Abbreviations
PD: Programme Director
TPD: Taught Programme Director
DRDC: Departmental Research Degrees Coordinator
FRDD: Faculty Research Degrees Director
DoF: Dean of Faculty
PDLT: Pro-Director (Learning and Teaching)
AR: Academic Registrar (School Prevent Lead)
SC: School Secretary (Prevent)
SRC: Students Representative Council

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1. **SCOPE**

1.1 This Policy applies to all students following School-based award-bearing programmes (Research Degrees, Masters Degrees, Postgraduate Diplomas and Postgraduate Certificates). It concerns students who are studying at the School and those who spend a period of time outside the School (in the UK or abroad) on School-related business. This policy also applies to all School staff who teach and support students through their time at the School.

1.2 The policy assumes that face-to-face contact with the student is possible. Similar issues identified with regard to distance learning students should be referred first to the relevant Programme Director, who will consider what further action might need to be taken under the different stages of this procedure. If the concern is Prevent-related, you should refer to section 4 of this policy and raise the matter with a School Prevent Lead (Academic Registrar / School Secretary).

1.3 The School is committed to supporting its students. The Student Cause for Concern Policy is meant to be a supportive and protective procedure which can be used when a student’s health, wellbeing or behaviour pose a detrimental impact on their ability to study or participate in School life or when their behaviour may pose a risk to themselves or others.

1.4 The Student Cause for Concern Policy also provides a framework for managing any concerns which might be raised in relation to the School’s Prevent Duty. Under the Counter-Terrorism and Security Act 2015, all Recognised Higher Education Bodies (RHEBs) are required to have due regard to prevent people from being drawn into terrorism. The policy is a supportive mechanism which ensures that concerns are addressed quickly, but proportionally, enabling appropriate support to be provided to those who are vulnerable.

2. **POLICY**

2.1 The School has a duty of care to both its students and staff. The School’s Student Charter sets out what standards of conduct students should expect and aspire to follow, during their time at the School. Support services (academic, administrative and welfare) are available to all students who need additional support. However, the School may need to take more direct action, namely when a student is unable or unwilling to manage their wellbeing in a way which supports their own health and safety, and / or which may affect others. In some circumstances, the Disciplinary Procedure may be appropriate, but if there is evidence (formal or circumstantial) that a student is in difficulty or is exhibiting disruptive behaviour, the Student Cause for Concern Policy may be more appropriate.

2.2 The Student Cause for Concern Policy is intended as a clear, transparent and supportive procedure for responding appropriately and sensitively to situations where significant concerns are raised about an individual student’s behaviour and/or their ability to manage their studies (the term “studies” relates to the entire student experience, not just the academic component). The School is committed to promoting wellbeing and combating discrimination, and any decisions and subsequent action will be in the best interest of the individual student, and based on evidence rather than on assumptions about a particular condition, situation or behaviour. In cases where there is a risk of adverse impact on others
(perceived or actual), the individual's needs will be balanced against those of others potentially affected. Every effort will be made to involve the student concerned in the process set out below, but if a student fails to co-operate or is unable to do so, then decisions will need to be made in their absence.

2.3 The Student Cause for Concern Policy is not an alternative to the Disciplinary Procedure and does not preclude other procedures concerned with academic performance, satisfactory participation and extenuating circumstances, including the withdrawal procedure.

2.4 The Student Cause for Concern Policy also addresses concerns about a student's behaviour in relation to the School's Prevent Duty. Under the Counter-Terrorism and Security Act 2015, universities are required to have “due regard to the need to prevent people from being drawn into terrorism.” This policy can be used if you have concerns that a student is being radicalised or drawn into terrorism. Further information will be provided under sections 3 and 4.

3. CAUSE FOR CONCERN TRIGGERS

3.1 A Cause for Concern may come to light in a number of ways, including:

- The student may volunteer information to a member of staff
- Fellow students may report concerns to other students or to a member of staff
- A member of staff may observe behaviour in a student which causes concern (please see examples below)
- A third party may report concerns to the School, such as a Warden at a hall of residence, or an off-site supervisor

3.2 General Causes for Concern
Certain behaviours might indicate that a student is a cause for concern under this policy. However, please be aware that any of the behaviours described below do not automatically mean that the student is in difficulty or poses a threat to themselves or others. If you have concerns it is best to discuss them with someone else first:

- **Academic Work**: The student does not complete/submit work, writes too little or too much, produces work which is incoherent or off topic, misses classes etc.
- **Appearance**: The student becomes unkempt, gains/loses weight or shows a decline in personal hygiene
- **Behaviour**: The student behaves in an unusually hostile, aggressive or unusual manner (disinhibited, erratic, unpredictable, anti-social etc.)
- **Changes in thought**: The student has poor concentration/memory, appears less rational, becomes preoccupied with new/unusual ideas, etc.
- **Isolation**: The student becomes excessively withdrawn
- **Mood changes**: The student appears anxious, upset, depressed etc.
- **Sound**: The student starts to speak differently – flat, loud, quiet, agitated, fast etc.

3.3 Prevent-related Causes for Concern
Certain behaviours might be cause for concern in relation to the Prevent Duty. Please be aware that any of the behaviours described below do not automatically mean that the
student is in difficulty or poses a threat to themselves or others. The School also has a responsibility to ensure freedom of speech within the law, where reasonably practicable. This is set out in the School’s Code of Practice on Free Speech.

- Any of the above (3.2). It is recognised that such behaviours may not be immediately identifiable as Prevent-related.
- Expressing support for violence or terrorism
- Possession/distribution of extremist material
- Voicing extremist opinions

4. **PREVENT-RELATED CAUSE FOR CONCERN**

4.1 Prevent-related concerns do not follow the informal/formal stages as outlined in the next section. Prevent-related concerns are dealt with under section 4.

4.2 If you become aware of any Prevent-related concerns about a student which you think may pose a risk to the student or to others, you should raise these with the Academic Registrar or the School Secretary immediately. The process is set out in Table 1 below:

**Table 1 – Prevent-related Cause for Concern**

<table>
<thead>
<tr>
<th>(a)</th>
<th>Concerns should be raised with the Academic Registrar or the School Secretary</th>
</tr>
</thead>
<tbody>
<tr>
<td>(b)</td>
<td>The AR / SC will consult with appropriate School staff to gain further evidence and then consult with a School Prevent Panel (at least one other member from the Prevent Working Group) to decide what action should be taken</td>
</tr>
</tbody>
</table>
| (c) | The School Prevent Panel will decide on the appropriate action as follows:  
- No concern and no further action required.  
- Not a Prevent concern, but should be referred to the Student Cause for Concern Formal stage 1, 2 or 3.  
- Possible a Prevent-related concern and will refer the matter confidentially to the Prevent Regional Coordinator at Camden for advice |
| (d) | Based on the advice from the Prevent Regional Coordinator at Camden, one of the following actions will be taken:  
- No concern and no further action required  
- Not a Prevent concern, but should be referred to the Student Cause for Concern Formal stage 1, 2 or 3  
- Refer the matter to the Local Channel Panel for further investigation |
| (e) | A record of any cases referred to the local Channel Panel will be recorded by the Academic Registrar as one of the requirements under HEFCE’s *Updated framework for the monitoring of the Prevent duty in higher education in England.* |
5. **INFORMAL STAGE**

5.1 If you have concerns about a student or a student raises concerns about their wellbeing with you, the first stage is to have an informal discussion with the student. You should give the student an opportunity to explain their situation and ensure that you listen to what the student has to say. If appropriate, you can advise the student about where they can seek support within the School and you may offer to make contact on the student’s behalf. If during your discussions the student raises something which you think may be a Prevent-related concern, please refer to Section 4 above.

5.2 If you feel that you cannot resolve the situation or you still have concerns about the student, then you should refer this on to the appropriate person. **If you do not know who to contact, you should not let this delay you from raising your concerns.** You should raise your concerns with anyone from the following list and they will be able to refer it to the correct person:

- Student Counsellor
- Student Adviser (Welfare and Disability)
- Taught Programme Director
- Faculty Research Degrees Director
- School Prevent Lead (Academic Registrar or School Secretary)

5.3 You are advised to make a diary note that the meeting took place with the student, but no other written record, such as completion of an Action Plan, is required at this stage.

5.4 A follow-up meeting with the student should be arranged, 2 to 4 weeks after the initial meeting, to review progress. If at this meeting:

- It is agreed between you and the student that the issues are being managed sufficiently, no further action is required.
- It is NOT agreed between you and the student that the issues are being managed sufficiently, the Formal Stage should be instigated.

5.5 The formal stage should be invoked, if it is perceived that, without intervention, there is a significant risk of one or more of the following:

- The individual’s studies being seriously compromised
- Fellow students’ experience being significantly disrupted
- Harm to self or others
- Unreasonable demands being placed on staff or students

6. **FORMAL STAGE**

6.1 The Formal Stage operates at 3 stages, set out below in Table 2. If the concerns raised relate to the Prevent Duty, then the process outlined in Table 1 in section 4 should be followed. Usually, Stage 1 should be entered first, proceeding to Stage 2 (and finally Stage 3) where necessary. However, in a more critical situation, it may be appropriate to enter the procedure directly at Stage 2 or 3.
6.2 In all cases, it should be the student’s personal tutor (MSc students), supervisor (Research Degree Students) or the Academic Registrar to invoke the policy at the appropriate stage, including progressing to the next stage. The personal tutor, supervisor or Academic Registrar will be responsible for scheduling of meetings.

6.3 A Plan of Action (Annex 1) should be completed by the personal tutor, supervisor or Academic Registrar in all meetings, whether at Stage 1, 2 or 3. This should set out what the School will do to ensure appropriate steps are taken in the best interests of the student or others (if they are at risk from the student’s actions). It should also include what evidence will be required in order for the student to return to studies as normal (such as a medical doctor’s note certifying that the student is fit to study).

6.4 **Interruption of Studies (IoS):** If an Interruption of Studies (IoS) is agreed, consideration should be given as to what level of contact will be maintained between the School and the student during periods of interruption. It may not be helpful for all contact to cease; the plan of action may therefore include one or more meetings (or contact by email / phone) during the period of interruption.

### Table 2 – Student Cause for Concern

<table>
<thead>
<tr>
<th>Level of concern</th>
<th>Action</th>
<th>Outcome</th>
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</table>
| **Stage 1**
Initial or emerging concerns (where informal action is deemed insufficient) | Student is invited by personal tutor / supervisor to a meeting to discuss concerns. Meeting may include:
- Student rep**
- PD / DRDC | Identify support options and agree plan of action*. Set a review date 2 to 4 weeks after initial meeting. The above to be recorded in Action Plan (Annex 1). |
| **Stage 2**
Continuing or moderate concern               | Meeting to be attended by student, plus one or more of the following: **
- Personal tutor / supervisor
- SRC rep***
- PD / DRDC
- TPD / FRDD | Agree plan of action (may include change of mode, IoS). Set a review date 2 to 4 weeks after initial meeting. The above to be recorded in Action Plan (Annex 1). |
| **Stage 3**
Persistent and significant concern           | Meeting with all previously involved, plus PDLT or AR and DoF where appropriate | Agree plan of action. Set a review date 2 – 4 weeks after initial meeting. The above to be recorded in Action Plan (Annex 1). |

* Available support options are given at Annex 1.

** Some or all of these may be consulted prior to or following the meeting as an alternative to attending.

*** A friend or representative may accompany the student at any meeting if desired, for instance a fellow student, programme representative, or an Officer of the Student Representative Council.
7. **STUDENT IS NO LONGER A CAUSE FOR CONCERN**

7.1 An important part of the discussion between student and relevant staff members will be reaching agreement as to how the student will be deemed fit to resume studies, with no further action required.

7.2 In some cases, this may require third party evidence to confirm that the student is no longer a cause for concern such as a letter from a medical professional (GP or psychiatrist), confirming that the student is fit to study. Where concerns have been raised under the Prevent duty and referred externally to a Channel Panel, evidence would need to be provided that the student no longer posed a risk to themselves or others. The evidence should be kept on file together with the Action Plan and stored in accordance with the School’s Data Protection and Record storage procedures.

8. **CONFIDENTIALITY**

8.1 In the event that the student confides the information directly to a staff member, that staff member should obtain the student’s consent to pass on the information to the tutor or supervisor. If the student does not agree, the staff member can contact the Counsellor, Student Adviser or Academic Registrar (without giving identifying information about the student) to discuss how to proceed.

8.2 If there are serious concerns about a student (i.e. Prevent-related issues, they have expressed intent to harm themselves or others etc.), **confidentiality cannot be guaranteed and this must be highlighted to students when they make a disclosure**. The School Secretary, Academic Registrar, Student Counsellor or emergency services (telephone 999), should be contacted immediately, as appropriate.

8.3 In the event that concerns arise out of observing a student (as opposed to the student confiding in a member of staff), reporting such concerns to a fellow staff member does not go against confidentiality.

8.4 At all times, concerns may be discussed in confidence with the Student Counsellor, Student Adviser, Academic Registrar or School Secretary, although it should be noted that it will not be possible to disclose information about any student, including whether the student has been seen by the Student Advice & Counselling Service.
Annex 1 PLAN OF ACTION

STUDENT CAUSE FOR CONCERN: PLAN OF ACTION - CONFIDENTIAL

This form to be completed with the student by personal tutor, supervisor or Academic Registrar. Original to be filed by personal tutor, supervisor or Academic Registrar. To be copied as indicated.

<table>
<thead>
<tr>
<th>Name of student:</th>
<th>Student ID number:</th>
</tr>
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<tbody>
<tr>
<td>Programme:</td>
<td>Faculty:</td>
</tr>
<tr>
<td>Date of meeting:</td>
<td></td>
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<tr>
<td>Meeting attended by:</td>
<td></td>
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<tr>
<td>Concerns raised by (name, position):</td>
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Brief description of concerns (how are the student’s difficulties manifesting, and what potential implications for studies, including adverse impact on fellow staff and students, if any):

<table>
<thead>
<tr>
<th>Support options identified</th>
<th>Contact</th>
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<tbody>
<tr>
<td>Mental health support and advice</td>
<td>Emma Nabavian, Student Advice &amp; Counselling Service</td>
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<tr>
<td>Welfare advice (housing, financial, immigration etc.)</td>
<td>Frankie Edwards, Student Advice &amp; Counselling Service</td>
</tr>
<tr>
<td>Disability support (including dyslexia and other learning differences)</td>
<td>Frankie Edwards, Student Advice &amp; Counselling Service</td>
</tr>
<tr>
<td>Change in mode of studies (e.g. part-time or split study, interruption of studies)</td>
<td>James Brown, Head of Registry</td>
</tr>
<tr>
<td>Extension to coursework</td>
<td>Refer to Taught Programme Director</td>
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<tr>
<td>Academic support</td>
<td>Refer to TPD for assistance via PASS (Personalised Additional Study Skills) scheme</td>
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<tr>
<td>Exam adjustment (extra time, separate room etc)</td>
<td>Frankie Edwards, Student Advice &amp; Counselling Service</td>
</tr>
<tr>
<td>Health-related concerns</td>
<td>Refer student to GP (and to LSHTM disability support if necessary)</td>
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<tr>
<td>Prevent concerns (radicalisation, terrorism)</td>
<td>John Peck, Academic Registrar Lucinda Parr, School Secretary</td>
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<tr>
<td>Other:</td>
<td></td>
</tr>
<tr>
<td>Action agreed</td>
<td>Who is responsible for taking this forward?</td>
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Follow up meeting to take place:  
Dd/mm/yy:

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<tr>
<th>✓  This form to be copied to:</th>
<th>Specify whether: <strong>For Information</strong> or <strong>For Action</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>PD: Programme Director</td>
<td></td>
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<tr>
<td>AR: Academic Registrar</td>
<td></td>
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<tr>
<td>Other: Please specify</td>
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</table>

I agree for the above information to be made available as indicated above

Signed (student) ________________________________ Date ________________