Cause for Concern Policy & Procedures (incl Fitness to Study)

These guidelines are for helping students experiencing significant difficulties or who may be at risk. They are intended to help where concerns arise around behaviour, and where those concerns continue to cause ongoing concern or difficulties after initial checking.

The guidance relies on several key expectations including the importance of students being in a position to successfully engage with their programmes at a challenging level. It also articulates the expectation on members of the College community to look out for others and respond to behaviours that raise concerns: to notice, check and share those concerns in order to ensure a safe, supportive and positive environment for all.

The policy attempts to recognise the wide range of difficulties experienced by students and the inherent complexity of problem situations. It also emphasises the importance *of a joint approach* to the support of students and to decision-making. It puts student support and key programme staff at the heart of managing significant concerns through a structured but adaptable model.

Emergencies and urgent response guidelines on backpage

December 2018

Introduction

This policy and set of procedures is designed to address situations where concerns are raised regarding individual students and, occasionally, groups of students. The reasons for the concerns and the character of individual concerns can be numerous, this policy provides a template to help address concerns as they arise.

The aim is to help any students, and those around them, who are experiencing significant difficulties which could, or seem likely to, have a major impact on the student's wellbeing or the wellbeing of others.

The guidance here is intended to help where a student appears to be in difficulty and, for whatever reason, also *appears unable to address these difficulties on their own.* It is not intended for situations, however complex, where the student is successfully working to resolve and manage their difficulties.

Students sometimes experience difficulties without recognising the impact on their work and engagement with the course. In other situations, it may be that their individual circumstances make it hard for them to assess what's going on and difficult to make clear and informed decisions.

The procedures enable those involved in managing student concerns to feel more confident and supported in their response. It aims to help staff and students to respond to behaviours and worries stemming from student behaviour that raise concern and suggest risk.

No two situations or experiences are alike and these guidelines aim to provide a framework to navigate and respond to situations which, by their nature, can be sensitive and difficult. The core expectation is that the members of the College community, staff and students, will actively look-out for, and take steps to help check the welfare of students whose behaviour is generating concern.

As well as helping to deal with incidents and emergencies, these notes are particularly designed to help when things are stuck or messy, when doing nothing is likely to leave the student to manage unknown difficulties or allow those difficulties to grow. They are intended to be:
- Visible
- Usable and adaptable
- Realistic and fair
- Integrated with existing regulations & policies
- Relevant and subject to ongoing review

The policy and procedures are designed to sit alongside existing policies and regulations. Although intended to be comprehensive and complete, they are intended to be regularly

updated and revised to meet changing needs and understandings and to ensure they are relevant and valid.

Elements & Principles of the Policy

Duty of Care & Safeguarding

The College has a duty of care for all students while at the College. That duty is to protect, with appropriate measures, their health, wellbeing and human rights so they are free from harm, abuse and neglect. This includes responding to on-site emergencies and working with students experiencing difficulties to provide appropriate support to enable them to help themselves and engage and thrive as postgraduate students and researchers.

In the context of this policy, the key understanding is that members of the College community should *act and respond* whenever and wherever concerns are observed. Concerns should be checked-out and shared as appropriate.

While it is a duty of the College as a whole to ensure a safe and respectful environment for all, it is a joint responsibility of individual Heads of Programme and the Student Support Manager (or others within the programme and support teams) to directly respond to and address concerns around student welfare. In particular circumstances, including the later stages of Fitness to Study (included in this policy), appropriate members of senior management are also involved.

This policy and set of guidelines seeks to initiate a meaningful response when a student's difficulties impact in adverse and significant ways on their engagement as a student. Some possible examples where a student might generate cause for concern:
- they behave very differently, are withdrawn or unresponsive
- their behaviours - over time, or in a particular incident - create valid worries in those around them
- they become disruptive or unsettling to those around them
- they fail to engage with their course and with others
- there are indications they may be at risk of being drawn towards violent extremism
- they are not attending - with no agreement and failure to respond to communications
- they are ill and there may be insufficient support available to them to fully engage with their course
- they may be engaging in harassing behaviour or being subject to harassment
- their behaviour causes valid health and safety concerns within the College

(Further examples are included in Appendix 1)

Whole College

This policy is relevant to everyone in the College. The guidelines are based on the understanding that staff and students collectively form the wider College community and have shared obligation to look out for each other when in difficulty. It may only require

passing-on those concerns, but the obligation reduces the risk of behaviour or situations being ignored on the assumption that others will attend to it.

Promoting Independence

The guidelines are also based on the expectation and requirement for student autonomy and independence. To successfully engage in postgraduate work, a student needs a level of independence and self management to meet the demands of research and study at Masters level. Support and assistance provided should help students to address immediate difficulties and facilitate their long-term independence enabling them to succeed in their professional practice.

Promoting safety and wellbeing

This policy is intended to collectively ensure and promote the safety of all. The aim is sustain the College as a safe and secure environment where all can flourish and engage in a community of learning, creating and making.

Confidentiality

Every member of staff has a duty to ensure confidentiality when involved in supporting and helping students. It is a cornerstone in any work with a student causing concern. Confidentiality is contained with the student and those members of staff who will be directly helping the student. Passing information onto others either within the College or outside (e.g. a member of a community mental health team) is done with the student's consent. Where there are worries around breaking confidentiality, this should be taken up with a member of the Student Support team and specific concerns can be discussed anonymously.

Where there is perceived risk, those working with the student may need to prioritise the welfare of the student above the preferences of that student. If it is thought that the student presents a danger to themselves or to others it may be necessary to override the confidentiality, wherever possible, this will be done in consultation with the Registrar or the Chief Operating Officer. Where the judgement of those supporting the student determines there is a significant risk - they will act directly on the perceived safety and welfare concerns.

Early Response

Students and staff may sometimes delay addressing or referring a problem which then escalates and becomes more complex and difficult to resolve. Early referral and raising of concerns is encouraged to increase the opportunities for providing support and tackling problems at a stage when they are likely to be more manageable.

Positive Academic Engagement

Students are required to actively engage with their academic work and with their programmes. This successful engagement includes (within reasonable limits) positive, coherent and respectful relations and communications with students, staff and other members of the College community. This expectation is articulated in the Student Charters.

Recognising Impact on Others

A key component is the recognition and taking-into-account of the impact a student's behaviour is having on others. The College has a duty of care to ensure all students are safeguarded from distress or harm by the behaviour of other students. A student who is judged to be disrupting the wellbeing and progress of other students may be subject to the procedures outlined here or through student misconduct or other procedures as appropriate.

Limits & Boundaries

Staff at the College need to be mindful not to attempt too much. In seeking to assist students in difficulty it is possible to overreach the limits of helping, particularly where a student may be at risk of harm or harming others. The intention should be to help the student to quickly access suitable professional help that matches the severity or complexity of their difficulties and that they positively engage in the management of those difficulties.

The independence and autonomy of the student is respected and promoted. It is not appropriate or reasonable for the College to act as guardian to a student. An appropriate level of help and support will be provided to enable students to engage with, and complete their studies (all things being equal) in the majority of circumstances. Students provide details of a person who can be contacted in an emergency at the point of registering at the College. Occasionally, it may be necessary to communicate directly with the emergency contact. Student Support can advise when it is appropriate to do this.

Recognising difficulties are normal

The procedures take account of what is normal and to be expected in day-to-day living. Depression, worries, traumas and stresses are a common part of everyday life and in most cases do not require special response or assistance.

It can sometimes be challenging to establish at what point behaviours shift from being part of the everyday stresses, moods and difficulties of life to becoming something that causes concern. It may be the severity of a particular behaviour, or the repetition of less intense behaviours that may generate concerns which require a response.

Raising concerns with students should done sensitively and respectfully. The perspective recommended here is wherever there are concerns, to consistently raise those concerns, share them and check them out.

Mental Health First Aid

The College has members of staff who are trained as mental health first aiders who can be called-on to respond to mental health emergencies. A list of qualified staff is available at the main reception desks at each campus, full details are also on the College intranet via this link or search 'mental health first aid'.

Prevent - responding to the risk of violent extremism

The College has a specific duty, under the government's Prevent legislation, to give due regard to the need to prevent people being drawn into terrorism. This legal duty has, in its application to individual students, a clear connection with safeguarding and cause for concern.

Where students are seen to be at perceived risk of being drawn into violent extremism, this constitutes a serious cause for concern both for the student and for others. Any such concerns can be addressed through the procedures outlined here.

Procedures

There are three broad categories of concern situations: *Emergencies* where external help is needed from the emergency services; *Urgent response situations* where an immediate and measured response is required without the help of the emergency services; and finally, *Ongoing concerns* that are less urgent but require prompt, coherent and appropriate responses together with the exploration suitable, ongoing monitoring and support.

Emergencies

Where student behaviour gives cause for **serious and immediate concern**, where it appears that they may present an **immediate risk to themselves or to others**, contact the emergency services by calling security on:
- Kensington: 0207 590 4177 or x333
- Battersea: 020 7590 4170 or 4478
- White City: 020 7590 4242

Security must be involved included in any emergency, if there is any delay getting through, call 999 and then inform Security immediately afterwards. Please also notify Student Support (contact below).

Urgent Response

In a situation that demands an immediate response and suitable follow-up but does not require the emergency services; contact a member of Student Support or Health and Safety to attend and assess. If out of normal office hours, contact Security.
- Student Support: 0207 590 4140 / 4288
- Health and Safety: 0207 590 4175
- Kensington Security: 0207 590 4177 or x333
- Battersea Security: 020 7590 4170 or 4478
- White City Security: 020 7590 4242
- Mental Health First Aiders: details at each Security Desk or via intranet

External sources of help

Samaritans	Tel:	020 7734 2800
Nightline (between 6pm and 8am term-time)	Tel:	0207 631 0101
NHS 24/7 Helpline for all Health matters	Tel:	111
Police non-emergency line	Tel:	101

Unsure if an incident is an emergency?

If there are any doubts whether the situation is an actual emergency, a judgement needs to be made quickly. If possible, this should be made in consultation with others. As a guide, an incident is regarded as critical if it is thought that the student is at risk of harm to themselves or to others.

If those involved in the situation are not confident in arriving at a decision, further support should be sought. If this is out of hours and there are no appropriate staff available, call 999 through the security desk at the main reception to the campus.

Student's Own Support Network

In responding to a student in an immediate situation it can be helpful to explore their own support network of friends, family or partners. If the student has trusted friends at the College who are happy to help, they may be able to provide useful support.

Getting the student home

Any student who is experiencing significant and major difficulties (but not requiring emergency services) should be encouraged to go home. If judged appropriate, the College may cover the cost of a cab in more urgent situations.

Recording Incidents

Wherever staff or students are called to a particular incident, this should be recorded using the Checklist and Report Format *(see Appendix 6)* and passed on to a member of Student Support.

Following-up from an urgent response

Following any urgent or emergency response, the student's Head of Programme and/or the Student Support Manager should be informed to ensure an appropriate response and that any ongoing concern is managed effectively.

Ongoing Response - *Fitness To Study*

These procedures apply when a concern (that is not an emergency or requiring immediate action) requires a meaningful response. They may be applied as a result of an emergency or urgent incident - or may be evoked as a result of accumulated concerns. There are three stages after initial reporting: informal joint discussion, formal discussion panel, and fitness to study panel.

The term "fitness to study" is frequently used to describe articulate and navigate the ability or capability of a student in particular circumstances, to successfully engage and complete their studies.

Key People

The student's Head of Programme or Personal Tutor or Supervisor and members of Student Support will usually form the foundation for this support. Additional people may also become involved as appropriate:
- Other programme staff including administrators, tutors and VLs
- Health and Safety Officers
- Lead Counsellor
- Occupational health (via Imperial College service)
- Chaplains (The Chaplaincy service is provided by Imperial College. Where significant concerns are raised about RCA students within the Chaplaincy, these will be shared with Student Support)
- External providers of support for example: community mental health teams, GPs or social workers etc.
- Deans and Registrar (usually at Stage 3)
- Prevent specialists (external) in cases where concerns include suspected violent extremism

Initial concern raised

Concerns should be raised and shared with Student Support. This can then lead to a range of responses consistent with the concerns raised. This will often include contacting the student to share these concerns and check on their welfare.

Concerns can be raised by any member of staff or any student. They may also come through
individuals outside the College including the Chaplain at Imperial College, landlords, friends or parents of students and others.

A key element in raising a concern with a member of Student Support is that this can be done without disclosing the student's name - this can be useful where the person raising concerns has worries around ensuring confidentiality.

Where students fail to respond to contact, friends and peers of the student will be asked. If it is not possible to verify their welfare, student support (in consultation with the Registrar) may get in touch with the person listed on the student's emergency contact. If the student's welfare is still not verified, two members of staff will visit their address as a final check before treating as an emergency.

In most situations, this initial checking will suffice. The necessary noticing, sharing and checking has taken place and any appropriate actions, support or adjustments have been established and then monitored over time.

Stage 1: Informal joint discussion

Stage 1 is to be initiated where concerns raised are agreed to be sufficient to warrant further attention and where the initial checking does not resolve the perceived difficulties. This involves an informal conversation with the student, a member of Student Support and the Head of Programme. The discussion is intended to explore the concerns raised and check-out the welfare and circumstances of the student from a holistic perspective.

Difficulties may emerge if a student is particularly vulnerable and experiences additional worry as a result of the request to engage in this discussion. It should be highlighted that the emphasis is on being open about the concerns for the student's welfare and the intention to explore potential solutions.

A meeting will be arranged to discuss the particular issues and concerns raised. An open and thorough dialogue is sought with the aim of exploring the nature of the concerns, any support needs of the student and any appropriate alternative options if necessary.

Occasionally a student may wish to engage in this stage without their Head of Programme, particularly if their difficulties are very personal or relate to specific experiences in their programme. In this situation the options and implications need to be explored carefully with the student. In certain situations, it may be agreed to undertake this stage without the HoP present but with another HoP, agreed with the student.

At Stage 1, a record of discussions will be produced, kept and shared by Student Support. The student, and the Head of Programme will have access these notes on request.

In most cases where a student enters Stage 1 the matter will be resolved at this point with agreed outcomes including; scheduling review meetings, referral to other services (both within and external to the College), establishing agreed support or adjustments, drawing-up an Inclusion Plan with the Disability Adviser.

Stage 2: Formal Discussion Panel

Where Stage 1 has not been successful or where initial concerns are considered more serious, Stage 2 should be initiated. This panel will include the student's Head of Programme (or representative), the Student Support Manager (or representative) and either an academic from another School or a member of the Registry team. They will also

determine if any additional people should be invited to the panel. In most cases the student will also attend, but the panel can also take place in the absence of the student either by reasoning of the panel members or, if the student is not in attendance. Where the student is in attendance, they have the right to bring a member of the College community to the meeting.

Relevant evidence may be sought, for example from a GP or Occupational Health assessment, before the panel convenes. Any evidence provided is not held to be binding. A letter will be sent out to the student after the panel outlining the decision of the panel.

The outcomes could include recommendations to: take no action, monitor the situation (including regular review meetings with a named member of staff), establishing and monitoring specific support (internally or externally), a warning letter as described in item 14 of the College General Regulations requiring the student to take a leave of absence or withdraw from the course or refer to Stage 3 of the procedures or other options as determined by the panel.

The panel will order its proceedings as it sees fit.

Stage 3: Fitness to Study Panel

Stage 3 should be evoked where Stage 2 has not been successful (for example, the student does not agree with the recommendations of the panel, or where initial concerns are considered sufficiently serious). This panel will include the student's Dean (or representative), a representative from Student Support (this can be the same person from Stage 2) and the Registrar. They will also determine if any additional people should be invited to the panel. The student will have the opportunity to submit documents to the panel to consider and will have access to any other documents to be received by the panel.

In most cases the student will also attend, but the panel can also take place in the absence of the student either by reasoning of the panel members or, if the student is not in attendance. Where the student is in attendance, they have the right to bring a member of the College community to the meeting.

Relevant evidence may be sought before the panel convenes and witnesses may be called if appropriate. Any evidence is not held to be binding. The panel will order its proceedings as it sees fit. A letter will be sent out the student after the panel outlining the decision and reasoning of the panel.

The decisions of the panel could include recommendations: to take no action, to monitor the situation (including regular review meetings with a named member of staff), to establish and monitor specific support, to agree a referral to external support, to require the student to take a leave of absence or withdraw from the course or any other actions deemed appropriate.

Temporary Exclusion

The Chief Operating Officer may, in assessing the risk to the student or to the College, impose an immediate, temporary exclusion for a fixed period of time. This exclusion would prohibit entering the College premises except by agreement with a member of Student Support.

Any exclusion would normally be reviewed within four weeks and the review may include a recommendation to convene a Fitness to Study Panel.

Return to Study

When a student takes steps to return from a leave of absence or exclusion, as a result of any formal part of this process, they will attend a Return to Study panel. This should include their Head of Programme and a member of Student Support. The panel will review their current circumstances and readiness to study and may require the student to undertake an occupational health assessment. *The panel can be held immediately prior to their re-entry exam.*

Appendix 1: Example Scenarios

These descriptions suggest possible scenarios where concerns would be raised. They are intended to indicate the range and variety of potential concerns.

Undisclosed health condition

A student experiences a number of seizures while at College. On each occasion those around the student are concerned and unsure what to do. When the student is taken by ambulance to A&E they are quickly sent home once conventional seizures are ruled-out. There is no available diagnosis. The student's engagement with the course is below standard. The student is reluctant to engage in discussion about risk management with the health and safety officer and is not keen to seek support.

Self harming

A student displays evidence of their self-harming through casual disclosure. This causes worry to members of staff and students. The apparent ambivalence of the student to concerns about their behaviour leaves those around them are unsure in how best to respond.

Increasing withdrawal

The programme administrator is told of some concerns around a student who is behaving in unusual ways and becoming increasingly withdrawn. The student is approached by a tutor to discuss. The student is emphatic there is no problem but continues to cause increasing concern and worry in others. Support staff are contacted by a member of staff from the student's private halls of residence to say they are worried by their behaviour.

Student experiencing harassment

A student who is normally very confident and motivated has been appearing a bit low. The student reacts positively when asked if things are ok but a close friend has gained the impression that they may have been experiencing some kind of personal or online harassment and are unsure how to respond.

Student stops attending

A student stops attending and does not return email or phone contact. Students and staff are unaware of the student's circumstances and there is no confirmation of their welfare. Friends of the student are also unable to make contact with them.

Student allows specific member of staff to support them

A student who has complex, but unsupported mental health concerns and with a history of difficult and challenging behaviour. They form a close bond with one of the visiting lecturers who comes in every two or three weeks. The student commits the tutor to personal confidence and will not disclose their condition or support needs to other staff either in their programme or in Student Support. The student increasing relies on the tutor and phones them out of hours to seek immediate help in increasingly risky and highly charged situations.

Worry around extremism

Concern is raised about an EU student who is expressing increasingly extreme anti-social and antagonistic views. The student does not integrate with peers and only engages with others through the articulation of unsettling ideas which are repeated many times. Other students report feeling worried as indications emerge that the student is actively associating with a German political group suspected of having violent leanings.

Unsettling behaviour

A student's behaviour becomes increasingly unsettling and disruptive even though their studio work is going well. They refer to complex plots and schemes, exaggerated and unusual claims together with apparently threatening approaches to particular individuals (although they are not able to say why they feel threatened). The student acknowledges difficulty sleeping but insists that they do not need help and any other concerns are mistaken or intrusive and expresses the desire to be left alone.

Possible suicide attempt

Tutors become aware a student in their programme has made an attempt on their life. When asked, they are unwilling to discuss. Concerns increase as the behaviour suggests that they remain unwell. The student collapses in the studio and explains to first-aid responders that they have taken too many pills. Others are worried this is a suicide attempt but the student disagrees and expresses irritation at the attention and concern.

Hearing Voices

An international student is hearing voices and raising concerns with other students in the studio. When engaging in conversations with the student, they describe experiences which are unlikely to have taken place. The student lives on their own, has no close friends and perceives their difficulties as deriving exclusively from the problem behaviour of others.

Problem behaviour while drinking

Reports emerge of a student who is drinking to excess and has been aggressive towards a number of students. When approached after the event they play down the behaviour saying it was 'just the drink'. Some while later there are reports that the student has been abusive, homophobic and threatening towards other students. Most of the incidents have taken place away from the College in a local pub.

Appendix 2: Student's Emergency Contact

When a student registers at the College at the start of their studies, they are asked to provide an emergency contact. This contact can be used to check in situations when a student is not attending College, not responding to contact and friends or peers are unable to verify their welfare. In consultation with the Registrar, an appropriate member of student support or programme staff may get in touch with the person listed on the student's

emergency contact. If the student's welfare is still not verified, two members of staff may visit their registered address as a final check before treating as an emergency.

Appendix 3: Occupational Health

Students can access occupational health advice at any point in their studies. The service is provided by Imperial College and is accessed by going through Student Support.

In cases where the is a concern around a student's health circumstances and their capacity at that time to engage in their programme, a direct referral to occupational health can be recommended. The outcome of any assessment can be used to inform thinking and decisions at a relevant stage in the Fitness to Study process. The assessment is not binding.

Appendix 4: Mental Health First Aid

The College has trained a number of staff in Mental Health First Aid (MHFA). The two-day course promotes awareness and understanding of mental health issues and seeks to reduce stigma. It also increases confidence in helping someone experiencing a problem and provides a robust framework for providing and initial response and assessing risk.

It is intended that further staff together with students who are interested have the opportunity to undertake this training to create a broad base of people within the College community who are both equipped, and willing, to help support others in difficulty. Information is available on the College intranet by searching for 'mental health first aid'.

Appendix 5: General Regulations 14. "Termination of study"

It may sometimes be appropriate to refer to, and apply regulation 14. While the Fitness to Study procedure would usually focus on health and personal concerns ahead of academic or disciplinary grounds, there may be times when this regulation is relevant to the circumstances of a given case.

"14. Other than failure in an assessment required for completion of the programme, a student whose work or participation in the programme is unsatisfactory shall be entitled to receive a written warning, which shall be referred to the ABCD. A student who has received a written warning, but does not meet the criteria for work or participation specified within that warning by a date to be specified in the warning, shall have their registration terminated upon the approval of the ABCD."

Appendix 6: Welfare Checklist and Report Format

Suggestions to help navigate an urgent incident. It may be hard to make judgements alone; wherever feasible, consult with others and use these suggestions, as appropriate, to help cover some of the key issues that may arise:

- What are the key concerns?
- What would resolve this - including the student(s) view of solution, if different?
- What is known - what is not known?
- What is the level of severity?
- What risks are apparent?
- What needs to happen immediately?
- What are the confidentiality implications & issues?
- Who needs to be informed today?
- What needs to happen later?
- Who is immediately impacted by this situation?
- Who else may be impacted?
- What kind of support does the student already have access to?
- What are the student's possible support needs?
- What are the support needs of others who may be affected?
- Any names, contact numbers or other information that need to be recorded?
- What things have already been tried?
- What other options could be tried?

Emergencies

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Security must be involved included in any emergency, if there is any delay getting through, call 999 and then inform Security immediately afterwards. Please also notify Student Support (contact below).

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- Mental Health First Aiders: details at each Security Desk or via intranet

External sources of help

Samaritans   Tel:020 7734 2800
NHS 24/7 Health helpline   Tel: 111
Police non-emergency line   Tel:101