

STUDENTS OF CONCERN POLICY

Students of Concern Policy

Introduction

1. The University of Law (the University) has a duty of care for all students and is committed to providing a safe and secure environment for all who access its facilities and services. The University's [Students Under 18 Years of Age Policy and Protocols](#) sets out the principles under which the University ensures the care and safety of students under the age of 18 enrolled onto a programme of study and its [Safeguarding Children and Adults at Risk Policy](#) ensures that there are arrangements in place to deal appropriately with issues concerned with suspected abuse of children and adults at risk. The University's [Prevent Duty Policy](#) sets out how the University implements its duty under the [Counter Terrorism and Security Act 2015](#) to exercise its functions with due regard to the need to prevent people from being drawn into terrorism. The purpose of this policy is to set out how the University promotes the safety and wellbeing of all students to sustain an environment where everyone can engage fully in a community of learning.
2. The University's aim is to ensure that students who need it receive an appropriate level of support to enable them to overcome obstacles in their learning. Most people will experience difficult times and challenges in their lives and being a student can be unsettling and problems can be exacerbated by aspects of university life such as being away from family and friends, studying in a new environment, and course deadlines. Support and assistance provided should, wherever possible help students address immediate difficulties and facilitate the successful completion of their studies.
3. To sustain an environment where all can engage fully in a community of learning students are expected to apply themselves conscientiously to their studies and be considerate and respectful of other students and staff. The standards of behaviour expected of students are set out in the [Student Code of Behaviour](#).
4. Where a student is causing significant concern to the University and as a result of physical, mental, emotional, or psychological health issues the University may initiate a procedure under the [Support to Study Policy](#) with the aim of finding agreed ways for students to continue with their studies, or to take a break from their studies by way of an intermission from their course, until they are able to re-engage with their studies and student life at the University

Scope of this policy

5. This policy extends to all members of the University. It is based on the understanding that staff and students collectively form the wider University community and have a shared obligation to be aware of those around them and pass on concerns where a student appears to be experiencing difficulties which seem likely to have a major impact on their own wellbeing or the wellbeing of

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others. The behaviours expected of staff, including the duty to put the welfare of students first, is set out in the [Staff Code of Conduct](#).

6. In following the guidance in this policy, it may become the case that other policies are relevant. For example, where the concern relates to a student who is under the age of 18 the [Safeguarding Children and Adults at Risk Policy](#) must be followed. This policy should therefore be read in conjunction with the following documents;

[Safeguarding Children and Adults at Risk Policy](#)
[Safeguarding Children and Adults at Risk Procedures](#)
[Students Under 18 Years of Age Policy and Protocols](#)
[Staff Code of Conduct](#)
[Student Code of Behaviour](#)
[Prevent Duty Policy](#)
[Dignity at Work and Study Policy](#)
[Support to Study Policy](#)

Definitions

7. A **child** is 'a person under the age of 18'
8. An **adult at risk** is defined as any person aged 18 years and over who is or may be in need of community care services by reason of mental health issues, learning or physical disability, sensory impairment, age or illness and who is or may be unable to take care of him/herself or unable to protect him/herself against significant harm or serious exploitation.
9. **Terrorism** is defined as the use or threatened use of violence for the purpose of advancing a political, religious, racial or ideological cause.
10. **Extremism** is the active or vocal opposition to fundamental British values such as democracy, the rule of law and tolerance of different faiths and beliefs.
11. **Radicalisation** is defined as the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
12. A **student** is defined as anyone who has enrolled on a University programme.. It continues to apply where a student has taken a break from studies or who has completed their period of study but has outstanding assessments.

Responsibility for this policy

13. Ultimate responsibility for the development of clear and effective processes and procedures associated with the quality assurance and maintenance of

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standards of academic provision and overseeing their application lies with the Academic Board.

Expectation

14. The expectation underlying this Policy is that members of the University community should act and respond whenever and wherever concerns are observed that a student appears to be in difficulty and also appears to be unable to address these difficulties entirely on their own. Early referral and raising of concerns are encouraged to increase the opportunities for providing support and tackling problems at a stage when they are likely to be more manageable.
15. Sometimes students experience difficulties without recognising the impact on their work and engagement with their course or their relationships with those around them. This Policy establishes procedures and guidelines which are designed to enable those supporting students to respond effectively and confidently where concerns have been observed.
16. This Policy is intended to be
 - Visible
 - Usable and adaptable
 - Realistic and fair
 - Integrated with other policies
 - Relevant and subject to ongoing review

Identifying difficulties and responding to concerns

17. Students may tell a member of staff or another student that they are experiencing difficulties. It may also be the case that those around the student become concerned because of something that they observe. Guidance for identifying difficulties is contained in Appendix A.
18. Where a member of the University has identified that a student is in difficulty, it is important that the concerns are assessed to determine if the student is in need of urgent or non-urgent support. Guidance for evaluating concerns is contained in Appendix B.
19. Where concerns have been assessed, the response should be appropriate to the level of urgency. Guidance for responding to concerns is contained in Appendix C.
20. If the student in difficulty is a child or appears to be an adult at risk, the concerns should be raised with a Safeguarding Officer in accordance with the [Safeguarding Children and Adults at Risk Policy](#) and [Procedures](#).

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21. If the concern is that the student is involved in terrorism, is expressing violent extremist views or is at risk of being radicalised, the concerns should be raised with a Safeguarding Officer in accordance with the [Prevent Duty Policy](#).
22. If the concern is that the student's wellbeing is being impacted by bullying, harassment, or sexual misconduct those supporting the student should make the student aware of the University's zero tolerance approach to unacceptable behaviour and its [Dignity at Work and Study Policy](#).

Student confidentiality and data protection

23. The University will collect and process information relating to students in accordance with the [University's Privacy Policy](#).
24. Employees will comply with the [Data Protection Policy](#) when handling personal data. Employees will also, where appropriate, refer to the University's other relevant policies including the [Data Retention Policy](#) and [Staff IT Acceptable Use Policy](#).
25. Confidentiality will be contained between the student causing concern and those members of staff who will be directly supporting the student. Passing information onto others will only be done with the student's consent unless there are reasonable and legitimate grounds for determining that there is a risk to the student or others, and it is deemed necessary to breach confidentiality. In sharing information with external parties, only relevant information to allow an adequate risk assessment to take place will be shared.
26. Whenever possible the University's Data Protection Officer (DPO) should be made aware in advance of any data being shared with external parties without the student's consent. In all other cases the DPO will be informed as soon as reasonably practicable.

Monitoring and review of the provision

27. Responsibility for reviewing and evaluating the effectiveness of the Students of Concern Policy lies with the Academic Board.

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Version history:

Version	Responsible	Revision summary	Date
V1.0	Director of Operational Services	Initial Drafting	03.08.2018
V1.1	Registry Officer	Change to coding convention	24/03/20
V1.2	Senior Quality Officer	Further naming convention clarifications	26/03/20
V1.3	Head of Student Information and Administration - Quality	Amendment to department names.	August 2020
V1.4	Director of Student Experience, Wellbeing and Inclusion	Review	October 2021
V1.5	Safeguarding Manager	Review and amendments to procedures inc. name of policy	February 2024

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Appendix A

Identifying Difficulties – Guidance for Staff and Students

Students may report their difficulty to you

Students may tell you about their concerns directly or indirectly with phrases such as “Things are difficult right now” or “I’ve had a lot going on, so I wasn’t able to do my preparation”.

The key thing to do is to listen. It can be helpful to ask open questions to see if they are willing to give you more information such as “Is there anything I can help with?” or “It sounds like you are having a tough time at the moment - would it help to tell me a bit more about it?”

If the student does reveal details of their difficulties, it is possible that they will tell you some distressing things. It is important to maintain a calm, patient and understanding demeanour. **It is also essential that you do not promise confidentiality to the student** – if you promise confidentiality and the student then reveals information that you know should be passed on, such as that they are at risk of harm, you will have put yourself in an untenable position.

The next step is to assess the urgency of the concern [Appendix B below] and then to follow the guidance as to how to respond to the concern [Appendix C below].

If the student asks you to promise confidentiality before giving more information you can respond by saying that you cannot promise this but then assure them that you would only do what was appropriate and necessary to assure their wellbeing and safety or that of others. If the student is not satisfied with this response you should explain to the student that they should not reveal any more information to you. You should recommend that the student contacts their Campus Wellbeing Service by emailing Wellbeing-[campus]@law.ac.uk or direct them to the Student Assistance Program (SAP) provided by Spectrum Life. Please also recommend the student downloads the ULaw Wellbeing app from the App Store or Google Play which has details of all ULaw services and third-party support organisations. Information can also be found on ELITE under Student Support Services on the Institution page and the campus organisation.

Make a written note of your discussion as this may be needed in the future.

Other ways of identifying students who may be in difficulty

You may become aware of students in difficulty because

- the student’s friends or classmates tell you that they think something is wrong
- the student is frequently absent from class or fails to submit/sit assessments
- the student is very often late for class and/or unprepared

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- the student's academic performance declines over time
- the student does too much work or appears overly conscientious – this may be because they are anxious or that study is a distraction from something else in their life that is causing them distress
- the student's behaviour is erratic or disruptive or they are very irritable and easily agitated
- the student appears persistently sad, very tense or is very emotional or lacks emotion
- the student is withdrawn, does not have friends or appears to have difficulty interacting with classmates
- the student expresses feelings of low self esteem
- the student avoids eye contact and is hesitant to engage in conversations
- the student lacks concentration, is often tired and/or struggles to think logically or make decisions
- the student's appearance or behaviour changes
- the student's appearance is unkempt and/or they have poor personal hygiene
- there are visible bruises, cuts, burns
- the student uses explicit sexual language out of context
- the student's views have become increasingly extreme regarding another section of society or government policy
- the student is observed downloading, viewing or sharing extremist propaganda or sexually explicit content from the web
- the student is increasingly intolerant of others' views and beliefs
- the student demonstrates high levels of anxiety, indecision, irritability, hopelessness, despair and distress which cannot be resolved by discussion or explanation
- the student is avoiding contact and help from others
- the student is exhibiting an overwhelming sense of not being able to cope
- the student is preoccupied with odd beliefs and thoughts (be mindful of cultural differences)
- the student is coping through misuse of drugs and/or alcohol, or other high-risk behaviours
- the student is physically unwell

If you have observed one or more of the above signs, you may think that you need to gather more information to determine whether the student is a cause for concern and the urgency of the situation. You may want to discreetly ask colleagues if they have any concerns, or you may wish to have an informal private conversation with the student to let them know what you have noticed and ask if they need support. You can always ask your Wellbeing Advisor, Mental Health Advisor, Safeguarding Officer, or Programme Support Lead for advice and you can do so without revealing the identity of the student.

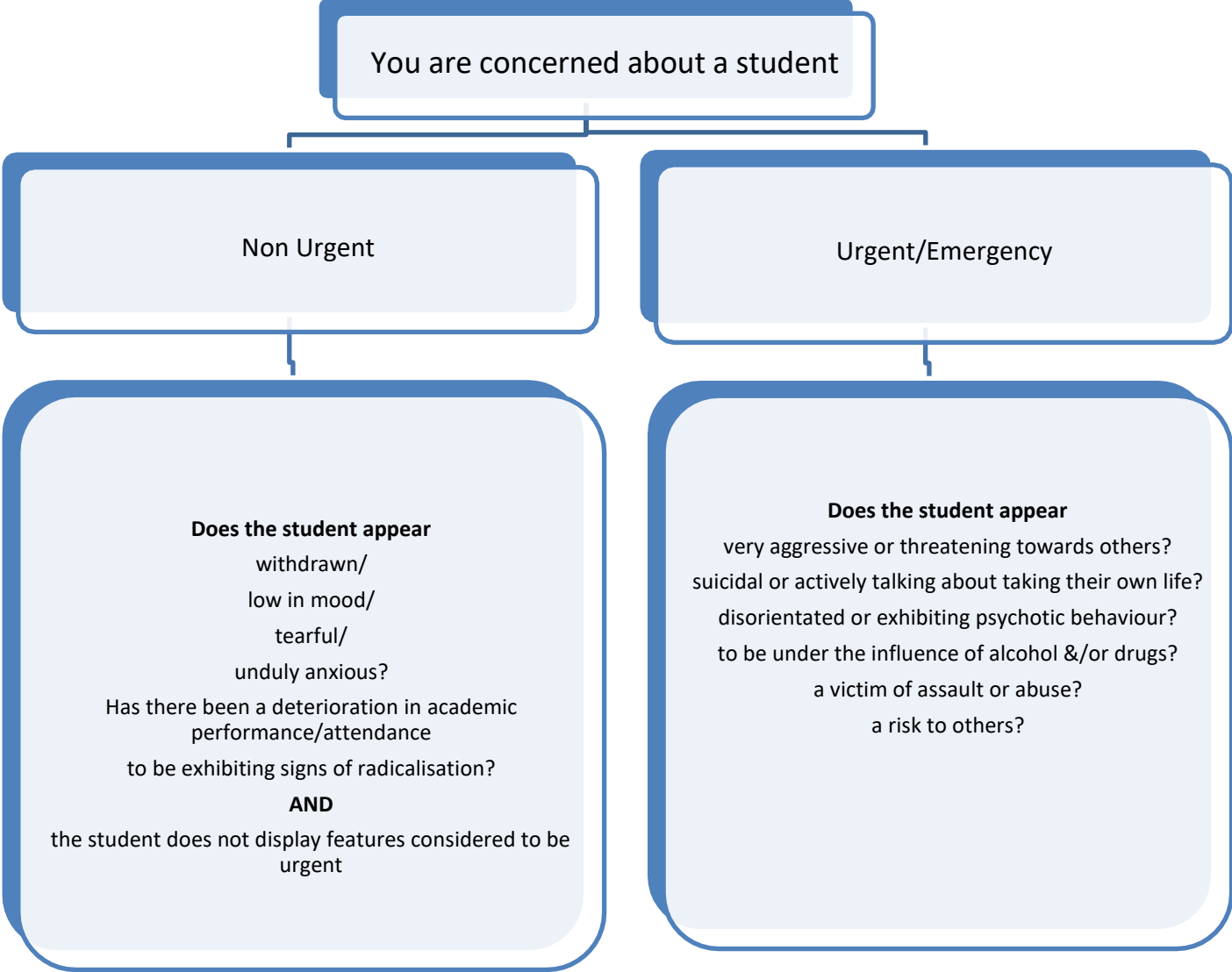
Students and staff may also use the [Report and Support](#) online reporting tool to report concerns for their own wellbeing, the wellbeing of another student and also incidents of bullying, harassment and sexual misconduct. Reports can be made anonymously but where contact details are provided the Campus Wellbeing Advisor will be asked to make contact to offer support to students and the Staff Wellbeing & Engagement

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Partner will make contact to offer support to staff.

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Appendix B

Identifying Urgency of Concerns – Guidance for Staff and Students



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Appendix C

Responding to Concerns – Guidance for Staff and Students

PLEASE NOTE whatever the situation you should not attempt to provide advice and support on matters about which you have not received training. If a student has confided in you about a difficulty you should not give them your opinion about what they should do even if you have experienced a similar issue yourself. Everyone is different and has different ways of dealing with situations and it will put additional pressure on the student if they feel that you have an expectation of how they should behave.

1. Urgent/Emergency situations

The situation is an emergency if

- the student has intimated that they have thought about killing themselves and has considered the means of doing so or has a definite plan.
- the student is likely to hurt other people or there is a serious risk to the wellbeing and safety of others
- the student appears to be mentally or physically ill and needs urgent help
- the student is very disturbed or aggressive and others feel threatened

If you are with the student, and it is possible to do so, call a colleague so that you are not acting alone. If one is available call a Mental Health Advisor, Safeguarding Officer, Wellbeing Advisor, but otherwise call a colleague as soon as possible. If you are not in a safe quiet place, try to move to one but avoid being in a very secluded area.

It is important that the student is encouraged to seek help themselves and if they are willing to do so you can facilitate them calling their GP or calling the emergency services. You may need to allow them the use of a phone and you may need to stay with them while they make this call. If they ask you to make the call on their behalf, you should do so in their presence.

If the student will not seek help themselves or they are too ill to do so you should tell them that you think they need emergency help and explain your reasons. Tell them that you would like their consent for you to do this but that you will need to make the call in any event because you are concerned for their safety or that of other people. The Data Protection Act 2018 allows the disclosure of sensitive personal information if it is in the vital interests of the individual or another person.

If you are with the student, and are able to do so, ask Security to call the emergency services whilst you and your colleague stay with the student if it is safe to do so. Give

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them your name, location, and a description of the situation. Also ask Security to inform the Campus Dean.

Do not accompany the student if they are taken off the premises by the emergency services even if they ask you to do so. It can be helpful to explore the students' own support network of family and friends and ask if you can contact the next of kin they named when they enrolled on the course. The emergency contact details are stored on the student information system.

If you are on a telephone/ video call with a student who discloses something that indicates an immediate risk of harm, such as that they are suicidal and have taken steps to carry this out, establish what address the student is calling from. If you assess that you must act immediately and the student is calling from the UK, explain that due to the level of concern you have for the student, you are going to call the emergency services. If you are on Teams, or have it open, you may be able to message one of the staff on the Emergency Contact List below using the chat function and ask them to call 999. If you cannot do this but you have another phone available to you it may be possible to keep the student on the call and contact the emergency services. If neither of these options are possible explain to the student that you will make a call to the emergency services and then call the student back to let them know what the emergency response time is. After calling 999 and before calling the student back send an urgent email to the staff on the Emergency Contact List below with brief details of what has occurred and monitor your emails for a response.

If you are on a telephone/ video call with a non-UK based student it is important to consider what country the student is calling from as in some countries suicide is illegal and therefore calling the emergency services could cause the student further harm

([https://en.wikipedia.org/wiki/Suicide_legislation#Laws_in_individual_jurisdictions_\(table\)](https://en.wikipedia.org/wiki/Suicide_legislation#Laws_in_individual_jurisdictions_(table))). Whilst you are on the call to the student you may be able to check on Teams to see if any of the staff on the Emergency Contact List below are available. If they are you can seek advice via the chat function. If you are not able to do this, tell the student that due to the level of concern that you have for the student, you are going to take advice from colleagues in the Student Support Service and that you will call them back as soon as possible.

Emergency Contact List

Head of Student Support Services	Keith Houghton	01483959770	Keith.houghton@law.ac.uk
Wellbeing Service Manager	Aidan Moloney	01483216977	Aidan.moloney@law.ac.uk
Head of Safeguarding	Nathan Shaw	01483216271	Nathan.shaw@law.ac.uk
Student Wellbeing Advice Manager	Helena Bowring	01483216587	Helena.Bowring@law.ac.uk
Deputy Student Wellbeing Advice Manager	Josie Carroll	01483405607	Josie.Carroll@law.ac.uk
Mental Health & Counselling Manager	Anne-Marie Price	01483959811	anne-marie.price@law.ac.uk
Campus Student Wellbeing Advisor			Wellbeing-[campusname]@law.ac.uk
Out of Hours Concerns	Spectrum Life	0800 031 8227	

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Write up a factual account of what has occurred as soon as possible – this can be in bullet point format but must include date, time, key details of the incident, names of others involved and who you made aware of it. Avoid giving opinion [e.g. rather than say “he seemed suicidal” or “she was aggressive towards me”] give the facts [e.g. “he said that he was going to take an overdose of pills” or “she lunged towards me and I believed she was going to hit me”]. If you believe the student is a child, adult at risk or is being radicalised you should state this very clearly and give the reasons for believing this.

If the student is under 18, an adult at risk or you believe they are at risk of radicalisation and a Safeguarding Officer was not present send your account as soon as possible to your Campus Safeguarding Officer. In all other cases send your account to the Campus Dean copied to the Campus Wellbeing email. Your account will be used to record details on the University’s casework management system and assist in the assessment and delivery of support.

Seek support for yourself if you need it. Speak to your line manager, Staff Wellbeing & Engagement Partner or contact the Employee Assistance Programme. You should maintain confidentiality and not reveal the student’s identity.

2. Non urgent situations but significant concerns – this is where a student is experiencing difficulties which they do not appear to be able to address themselves.

Students may present with serious issues, but the situation is not an emergency.

If you have concerns that the student is a child, an adult at risk or is being radicalised you should report your concerns to your Campus Safeguarding Officer immediately.

If the student talks to you about their difficulties listen to them in an empathetic way. Do not be alarmed if they cry – this is a natural reaction to difficult situations and if you appear uncomfortable this could lead to the student feeling embarrassed. Do not feel that you have to fix their problems for them and do not make promises such as “everything will be ok”.

If the student discusses mental or physical health problems, please tell the student about the Disability and Inclusion Service (DIS) and that you will contact them on the student’s behalf. Once the student has disclosed a disability to any member of University staff the University is under a duty to put reasonable adjustments in place and therefore it is essential that the DIS team are made aware of the disclosure.

You can help prevent the situation from escalating and becoming more serious by explaining to the student that the University has specialist support staff, and you will ask the Student Wellbeing Advisor to make contact with the student to explain what support is available to them. If the student appears hesitant it is often reassuring to explain to the student that when they receive the contact from the Student Wellbeing Service, they can decide what, if any, support they would like to receive. It is also

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encouraging to explain to the student that information will only be shared on a “need to know” basis for the purpose of providing support to the student. This is in accordance with the University’s Privacy Policy.

Raising a concern with the Student Wellbeing Service can lead to a range of responses consistent with the concerns raised. Other people may become involved as appropriate and could include the Mental Health & Counselling Manager, Mental Health Advisor, the Disability Support Service Manager, the Programme and Support Lead, Safeguarding Manager, the Head of Student Support and the Campus Dean. An early consideration may be whether a meeting held under the Support to Study Policy would be an appropriate course of action.

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.

If you are supporting a student outside of the hours 9am – 5pm and you don’t believe an emergency response is required as detailed above, you can contact the Student Assistance Programme (SAP) 24/7 support line for further advice and guidance.

Out of Hours Concerns	Spectrum Life	0800 031 8227
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In all situations, whether you have spoken to the student or not, you should email the relevant campus wellbeing inbox to alert support staff that you have concerns. Please give the student’s name and details of your concerns. You may be contacted by a member of support staff for more information, but you will not be kept informed of the outcome of your referral. If, on considering all of the available information, members of the support team consider the concern to be significant, this will be highlighted within the University’s casework management system as a Student of Concern, or where appropriate a Safeguarding case will be created.

3. Supporting students to help themselves

Where you are aware that a student is experiencing difficulties, but the difficulties do not appear to be overwhelming the student, you can support the student to help themselves.

If the student has confided in you listen empathetically – it is sometimes enough that someone has taken the time to talk to them. You can ask the student if they are already receiving support from other sources. If not, explain they can find out information about the [University’s Support Services](#) on the ELITE Institution page, and the ULaw Wellbeing app which is free to download from the App Store or Google Play. Keep brief, factual and accurate notes of your meetings/discussions with the student.

If you offer support to the student, set very clear boundaries about what your role and

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remit is. For example, you may offer to help the student catch up on missed classes. **Do not offer support which you are not trained to provide. Do not provide your personal contact details** as this can confuse the student about the nature of your relationship with them and create a dependency on you. **Do not communicate with the student outside of office hours.** If you are worried about how the student will cope when you are unavailable, provide them with the contact details for the Student Assistance Programme 24/7 support line. There is also information about external support services on the ULaw Wellbeing app.

If you offer ongoing support to a student periodically stop and consider whether you are the best person to do this or you are getting out of your depth. For example, if you are worried about how the student will cope when you are unavailable or supporting the student is affecting you this indicates that the student should be referred to the Student Wellbeing Advice Service. If supporting a student is impacting upon your own wellbeing, staff members should consider using the Employee Assistance Programme or talk to your line manager for support..