| SPJ S P Jain London School of Management | Students at Risk Policy |
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1. Purpose

- a. SP Jain London School of Management (SPJUK) aims to provide a learning environment where students have an enriching and successful learning experience. This policy sets out the School's mechanisms for identifying students who may be at risk of not progressing satisfactorily and the processes used to provide proactive targeted and timely support.
- b. The policy also deals with students who are distressed and those who are considered to be vulnerable to radicalisation in line with its obligations under the Prevent Duty.
- c. It also sets out how the School enables support who are the victim of sexual violence or sexual or other harassment and how these issues will be dealt with.

2. Guiding Principles

- a. SPJUK is committed to the provision of student support for all students to support their retention, progression and success.
- b. The requirements for students to progress within their programmes will be communicated to all students before they begin and throughout their enrolment.
- c. SPJUK will implement processes for early identification of personal or academic issues that have the potential to adversely affect students' educational outcomes or their wellbeing and have mechanisms for dealing with these in an appropriate manner.
- d. SPJUK supports students and also fosters independence by encouraging them to be responsible for their own learning and wellbeing.

- e. SPJUK will implement processes to identify students needing additional support so that the intervention is respectful, timely, equitable, consistent and procedurally fair. Towards this, the School will:
 - adopt strategies to identify students who require additional support to achieve their academic potential; this includes remedial classes and additional teaching/tutorials to support student learning.
 - ii. support the mental health and well-being of its student body through a range of educational and support initiatives.
 - iii. undertake analysis of admission data or entry pathway to identify students and cohorts who may require additional support.
 - iv. undertake cohort analysis of progression, completion and attrition rates to identify students and cohorts who may require additional support.
 - v. promote information about accessing support services to students and staff.
 - vi. encourage students with academic or personal support needs to access support from relevant internal and external support services.
 - vii.only undertake interventions with student's consent unless it is a medical emergency.

3. Scope of the Policy

a. This policy applies to all enrolled students at SPJUK.

4. Duties

a. Student obligations:

Students are expected to:

- i. seek and follow advice from the academic staff teaching them;
- ii. seek help from their tutor or academic manager for academic issues;
- iii. seek help from Student Services if they have personal issues;
- iv. meet attendance requirements for each module or unit of study;
- v. regularly access the Virtual Learning Environment (VLE) and make use of its resources;
- vi. submit all assessments on time;
- vii. achieve at least the minimum progression requirement in each stage or year of study;
- viii. make the School aware of any barriers to completing their academic requirements in a timely fashion:
- ix. respond to any formal notifications regarding concerns for their progress, and
- x. not hesitate to seek internal or external support where an issue is having, or is likely to have, an impact upon their academic progress.

b. School's responsibilities:

The School will implement processes including:

- i. identification of demographic information, English language proficiency, and levels of prior study through admission processes;
- ii. provide information about student support and early intervention strategies through orientation programmes;
- iii. outline information about academic expectations, academic integrity, course requirements and conditions of completion to students prior to commencement;
- iv. identify students with low or insufficient attendance and/or do not access the VLE regularly;
- v. Use assessments (formative or summative) in the early weeks of the programme to identify student who may be struggling
- vi. monitor progression and overall progress towards completion of degree;
- vii. identify students who require additional English language support;

- viii. monitor applications for mitigating circumstances and provide additional support as appropriate;
- ix. provide appropriate student support mechanisms to deal with personal barriers to success including mental health and other issues such as harassment and sexual misconduct;
- x. identify students requiring academic support as detailed in 5a;
- xi. implement support activities as detailed in 5b, and
- xii. Monitor the policy through KPIs and student views on the support provided.

5. Academic Support

a. Identification of students requiring academic support

- i. For modules or units where students are required to attend lectures and/or other engagements, attendance records will be kept and monitored by the relevant Programme Director. As an early intervention strategy, students with low or insufficient attendance for the programme will be reported to the Dean, Registrar, assigned teaching staff and the student support staff or initiation of remediation and intervention as detailed in 5b.
- ii. As an additional early intervention strategy, the relevant Programme Director will monitor students' VLE access for each module or unit for the initial 5 sessions to identify any students who show low engagement with the learning material provided by teaching staff. Any students demonstrating low engagement will be reported to the Dean, Registrar, assigned teaching staff and the student support staff for initiation of remediation and intervention as detailed in 5b.
- iii. Early assessments within a module or unit will be used to allow students to gauge their academic progress and also to identify students 'at risk' and enable these students to seek support as early as possible as also for remediation and intervention as detailed in 5b.
- iv. Students who do not meet the progression requirements for the programme will be reported by the Registrar's office to the Dean so that a review of their programme and what is required to complete it can be undertaken.

b. Remediation and support

- i. An appropriate member of staff will meet the students who have low attendance and/or low VLE engagement and counsel them to increase their engagement in the course. An update report of such meetings will be provided to the Dean and Registrar. Where there is continued low attendance and engagement, students may be referred to the Student Services for wellbeing support and guidance and to identify any personal issues the student may be facing and what other measures are required.
- ii. Students who do not achieve the appropriate standards in early assessments for a programme will be signposted towards an appropriate source of support.
- iii. The Dean will meet the students who are identified as being at risk academically and where required confirm and initiate remedial actions. These remediation actions may include additional coaching and greater access to teaching faculty for guidance on the sections of the learning to review.

6. Identification and care of students requiring personal support

- a. Staff and students are encouraged to be alert to signs of physical or mental distress which could involve low attendance, changes in behaviour or even inappropriate, intimidating and aggressive behaviours by a student.
- b. A student may be identified as requiring personal support and intervention where their physical or mental wellbeing is reasonably considered to warrant some form of intervention by the School.

- c. In these cases, where a student is exhibiting possible signs of distress, how staff respond to the individual student will depend upon the nature and level of their distress. Staff should be aware of their own personal and professional limitations. Staff members are encouraged to consult with the Student Services for advice about the appropriate management of any student. Please see Appendix 1 for guidance. You should always report any students in distress or where they have disclosed they are victims of violence or harassment, including domestic violence or forced marriage.
- d. Where required, Student Services will work with the student and if needed, recommend external medical or counselling consultation. If needed, Student Services will also update the Registrar to enable academic monitoring of the student.

7. Prevent; dealing with extremism and radicalisation

- a. The School is required to have due regard to the need to prevent people from being drawn into terrorism (the Prevent Duty). Staff in the School will be trained on the duty and the kind of behaviours which might cause concern. Guidance for staff is set out in Appendix 1.
- b. Staff should report any concerns that a student may be being radicalised, drawn into extremism or terrorism and keep a careful record of what prompts this concern. Concerns may also be raised regarding radicalisation by other students and this should also reported.
- c. Concerns reported will be assessed by the Prevent Group within the School and, if appropriate, referral will be made according to the Information Sharing Protocol. Staff should not themselves report concerns externally but rather report them to the Prevent Lead for consideration.

8. Support for students who have experienced harassment, sexual misconduct or domestic violence

- a. Students who have experienced harassment should be given the Guidance on Dealing with Unacceptable Behaviour which sets out how they can either raise a complaint and or report the issue to the police. Student Services should be informed so that they can provide support for the student. Where the alleged perpetrator is a fellow student, this will need to be raised with Student Services so that the allegations can be investigated.
- b. Students who have been the victim of sexual misconduct, violence or abuse should be advised about the options available to them as outlined in Appendix 2 and provided with the appropriate options leaflet.
- c. Students who are the victims of domestic abuse should be advised in line with Appendix 3.
- d. Staff should report disclosures of any form of harassment, sexual misconduct or other abuse to Student Services to ensure that appropriate follow up action may be taken.

9. Contacting student emergency contacts

- a. At enrolment, students will be asked to nominate a contact who can be contacted in an emergency. They will be asked to consent to this person being contacted in the event that there is a welfare issue and the School is concerned about the safety of the student. This may include where the student has:
 - i. been admitted to hospital in an emergency;

- ii. suffered a serious physical injury, including self-harm;
- iii. failed to engage with their studies and we are unable to contact them;
- iv. an ongoing illness which appears to be deteriorating;
- v. been experiencing a mental health crisis.
- b. Any decision to inform an emergency contact will be discussed with the student unless it is not possible to do so. In this event, the Head of Student Services should discuss the matter with the Chief Operating Officer who will authorise disclosure on a case by case basis taking account of all the factors known to the School.
- c. Students can withdraw consent for contact with the emergency contact at any time by alerting Student Services. However, there may be occasions where it is considered that it is in the vital or best interests of the student to contact the emergency contact. The Head of Student Services and the Chief Operating Officer will consider each situation on a case by case basis and only disclose where it is considered absolutely necessary to protect the welfare of the student.

10. Recording interventions

All interventions or suggestions that students should seek additional support will be recorded on the Student Record System. This is to ensure that there is a full picture of a student's individual journey and also ensure that interventions are followed up and necessary actions taken. Access to case notes will be restricted to staff as required to maintain appropriate confidentiality.

11. Staff training

All staff will be provided with training on this policy and how to identify students at risk. This will include training on how to signpost students to further sources of support where required.

12. Monitoring and evaluation

The School will monitor the implementation of this policy through regular reviews of student progress and whether the interventions have been successful. In addition the Policy will be reviewed by the Learning and Teaching Committee as part of the annual review of learning and support services (see the Student Support Policy).

Appendix 1: Dealing with potential radicalisation/extremism

Section 26(1) of the Counter-Terrorism and Security Act 2015 ("the Act") imposes a duty on higher education institutions to have due regard to the need to prevent people from being drawn into terrorism

The duty covers all aspects of radicalisation, including far right extremism, Islamic fundamentalism, animal rights extremism etc.

The School works with partner agencies, particularly the DFE, to safeguard vulnerable individuals who are at risk from potential radicalisation. It will seek advice from these partners if there is an individual who is causing concern or if there is a request for an external speaker about whom the School is concerned.

Staff should report any concerns, these will be investigated sensitively. No action will be taken before confidential advice has been received. Staff should therefore report any concern, however, small to the Chief Operating Officer. Concerns should only be raised internally.

There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism. Some of the risk factors which could make a student susceptible to radicalisation are the following:

- A perception/experience of discrimination
- Experience of identity-based harassment
- Significant change in life, such as family break-up, unexpected failure of exams, confusion about the sense of purpose in life
- Depression or a feeling of worthlessness
- Negative views of policing
- Lack of trust in democratic government
- A perception that specific communities are being unfairly treated
- Personality driven factors
- Lack of sense of belonging and purpose

Things that staff may be concerned about are as follows:

- marked changes of behaviour
- expressed support for violence or terrorism
- possession of violent extremist literature
- engaging with websites which promote extremist views
- attempts to access or contribute to violent extremist websites
- possession of material regarding weapons and/or explosives/military training etc
- claims of involvement in organisations/training camps/violent activity on behalf of violent extremist groups

Supporting students at risk of being drawn into terrorism is often about diverting people away from potential harm at an early stage. The UK's 'Prevent' counter-terrorism strategy is focused on providing practical help to stop people from being drawn into terrorism. The strategy covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism.

People who are found to be at risk of radicalisation are then offered support through the 'Channel' programme. The Channel programme is voluntary and confidential and focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. The programme uses a multi-agency approach to protect vulnerable people by:

- identifying individuals at risk;
- assessing the nature and extent of that risk; an
- developing the most appropriate support plan for the individuals concerned.

Channel may be appropriate for anyone who is vulnerable to being drawn into any form of terrorism. Channel is about ensuring that vulnerable children and adults of any faith, ethnicity or background receive support before their vulnerabilities are exploited by those that would want them to embrace terrorism, and before they become involved in criminal terrorist related activity. The programme involves several agencies working together to give individuals access to services such as health, education, specialist mentoring/

Channel is not about reporting or informing on individuals in order to prosecute them and will not show up on any DBS or other checks or impact negatively on an individual. It is about communities working together to support vulnerable people at an early stage, preventing them from being drawn into terrorism or violent extremism. Channel is based on the premise that people being drawn into radicalisation and recruitment can be identified and then provided with appropriate support, which

Appendix 2 -- Student in Distress: How to Respond

Non-Urgent

If the student is or appears:

- Withdrawn, low in mood, tearful or unduly anxious or has a sudden deterioration in academic performance
- Does not display features considered as Urgent/Emergency
 - o Clarify why the student is upset and identify what existing support is in place
 - o Identify if the student wishes to or is willing to seek help
 - o Advise the student to make contact with Student Services
 - If a student does not wish to follow your advice, their wishes should be respected. No further
 action is appropriate at this stage unless the student's condition deteriorates to become
 Urgent or Emergency
 - o Do not probe further it is up to the student how much/if any information they wish to tell you

Urgent/Emergency

If the student is or appears:

- Very aggressive/threatening towards the staff member or other students (seek help from security 333 and/or Police 999)
- Suicidal/actively talking about suicide
- Disorientated or is displaying psychotic behaviour
- Taken an overdose of drugs/alcohol
- A recent victim of an assault or an attack
- A risk to self or others
- Taken an overdose of drugs/alcohol
 - o If possible consult Student Services or other member of the administration team and try not to act alone (it is important to ensure your own safety and that of the distressed student)
 - o Talk to the student and explain your concern (unless you believe this will aggravate the situation)
 - o If the student is violent or armed, inform Campus Security and contact the Police
 - In a non-life-threatening yet urgent situation, identify if the student is willing to seek help and seek consent from the student to contact Student Services
 - o Consider A+E or emergency services if other services are unavailable or closed

Appendix 3: Incident of Sexual Violence/Abuse: How to Respond

Staff members who are concerned about a student who has disclosed any form of sexual violence or abuse should ask the student what they want to do. They should not make assumptions or act without consent. They should not judge or comment on the situation but just listen to the student and follow the guidance below. Where the alleged perpetrator is internal, a full investigation will be needed before any outcome is made.

Staff Actions – Internal

- Inform Student Services and take the student to a confidential, quiet space where they will not be interrupted (if they are accompanied at the time; check with the student if they wish for this person to stay)
- Identify if they wish to seek further support, speak to a person of a different gender or member of Student Services
- Listen to the student without probing or asking questions about the incident itself your role is only to listen and provide support, not to investigate.
- Do not take detailed notes an incident report should only contain the date, time, name of student, alleged perpetrator (if known) and support offered. Memories may be fragmented and re-interpreted and could be used by the police/courts at a later date.
- Allow the student the time they need to talk
- Does the student need alternative accommodation? (Contact Student Services who will be able to provide advice about emergency accommodation)
- Advise the student to contact Student Services and relevant external services and encourage the student to make contact themselves if/when they are ready by providing them with the list of services and contact details. If the student wants the service to be contacted on their behalf, Student Services will do this for them.
- If the student does not wish to follow your advice their wishes should be respected
- Give the student the options leaflet and go through it with them. Please ensure to make it clear that the student does not have to disclose their circumstances to the police.

Student Options – Internal

- If the alleged perpetrator is a fellow student or staff member, the reporting student may wish to make a complaint in line with the Complaint Procedure and the Guidelines for Dealing with Unacceptable Behaviour. All complaints need to be fully investigated by the School prior to any outcomes.
- They may wish to receive emotional or other support and you should refer them to Student Services. Ask their consent to inform Student Services who will contact them to follow up.

Student Options – External

• If an incident occurred within the last 24 hours:

NB: If the alleged perpetrator is still in the vicinity or if they remain an immediate danger to the student or others , the staff member should ask inform Student Services or the COO who will contact the police

If the alleged perpetrator is not an immediate threat then do not contact the Police unless the student clearly consents for you to do so.

If an incident occurred within the last 7 days:

Forensic evidence can be collected up to 7 days after the incident. If the student wants to preserve forensics, they may need urgent referral to the nearest SARC (Sexual Assault Referral Centre):

Do not offer food and drink- forensic evidence may be lost by eating, drinking, smoking, urinating and washing.

Useful contacts

- The Havens (SARC's London 3 Locations) 24hrs 7days Tel: 020 3299 6900
- <u>Independent Sexual Violence Advisors (ISVAs)</u> External advocacy for advice for recent or historical sexual violence
- <u>SurvivorsUK</u> A society that acknowledges, supports, and advocates for men and non-binary people who have been affected by rape or sexual abuse.
- Emergency Services 24hrs Tel: 999
- NHS out of hours Tel: 111
- Samaritans 24hrs Tel: 116 123
- Papyrus HOPElineUK (9am-12am) Tel: 0800 068 41 41 Text: 07860 039 967 Email: pat@papyrus-uk.org

Appendix 4: Support students who are victims of domestic violence

Staff members who are concerned about a student who has disclosed any form of domestic violence or abuse should ask the student what they want to do. They should not make assumptions or act without consent

Staff Actions – Internal

- Inform Student Services and take the student to a confidential, quiet space where they will not be interrupted (if they are accompanied at the time; check with the student if they wish for this person to stay)
- Identify if they wish to seek further support, speak to a person of a different gender or member of Student Services

√ Do

- Speak to them in a private space where they feel safe
- Listen, believe and acknowledge
- Tell them it's not their fault
- Reassure them they're not alone and signpost appropriate services
- Respect their background, culture and beliefs

X Don't

- Ask questions like 'Why don't you just leave?'
- Make assumptions based on the persons beliefs, values, age, sexuality or gender identity
- Force the issue it might take several tries before they are ready to talk
- Speak to the family or friends of the victim

After speaking to the student, the staff member should inform Student Services so that the issue can be logged. In cases where the student has children, Student Services should make contact with the local authority social services as this is a safeguarding concern.

Useful contacts

- National Domestic Violence Helpline (for women) Tel: 0808 2000 247
- Respect Helpline (for men) Tel: 0808 801 0327
- GALOP National LGBTQ+ Helpline Tel: 0800 999 5428
- Karma Nirvana (Helpline for victims of forced marriage or 'honour'-based abuse) Tel: 0800 5999 247