

## Unsatisfactory Engagement Policy and Procedure

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### 1. Introduction

- 1.1. The College expects its students to engage fully with their programme of study, and students are required to attend to the satisfaction of their Head of Department<sup>1</sup>, as described within their programme documentation. Full engagement is necessary for a student to gain the knowledge, skills, and academic development needed to fulfil the demands of their programme. Where a student does not meet these expectations, the College reserves the right to require them to withdraw from the College.
- 1.2. The right to require a student to withdraw from the College on these grounds is vested in the Senate and is delegated by the Senate to the Departments, subject to the following procedure referred to below.
- 1.3. This policy and procedure describe how the College will consider and seek to support students that are failing to meet our expectations for their engagement, where this is not resolved the process for withdrawal of studies and the route of appeal in relation to this decision. In respect of this policy engagement refers to attendance and engagement with all learning and teaching activities such as lectures, tutorials, lab session, supervision sessions and assessment points such as in class tests, coursework submissions or examinations. For Research students, consideration will be given to the progress being made by the student and their engagement in their research between formal milestones.
- 1.4. This policy and procedure apply to all enrolled students (Section 3: Undergraduate and Postgraduate taught, Section 4: Postgraduate Research, Section 5: visiting and occasional students), and should be considered in conjunction with the College's *Fitness to Study, Procedure for the Assessment of Fitness to Practise Medicine and Mitigating Circumstances Policy and Procedures* as appropriate. Consideration should also be given to any requirements on students who are registered at the College as a student visa holder.
- 1.5. If at any point subsequent to invoking these procedures it becomes appropriate to consider the student under an alternative procedure, then the student will be informed of this decision and the reason for it.

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<sup>1</sup> For the purpose of this policy, the term "Department" may refer to Imperial College Schools, Centres, Divisions, and Institutions, as appropriate. "Head of Department" will include the equivalent in these areas to College academic departments.

- 1.6. The policy and procedure, including the appeals process, will not be used in cases where a withdrawal decision has been made by a Board of Examiners (undergraduate and postgraduate taught students) or in the case of Postgraduate Research students an Early Stage Assessment (ESA), Late Stage Review (LSR) or final examination. In these cases, the relevant Academic Appeals procedure and/or mitigating circumstances procedure must be used.
- 1.7. The College has incorporated, where appropriate, the principles of the [Good Practice Framework](#), published by the Office of the Independent Adjudicator for Higher Education on its website ([www.oiahe.org](http://www.oiahe.org)) in the development of this policy and procedure with particular reference to the sections: *Handling Complaints and Academic Appeals*, *Supporting Disabled Students*, and *Requests for Special Consideration*.
- 1.8. All cases considered under this procedure will be dealt with confidentially but under the proviso that enquiries may have to be made to fully consider the matter.
- 1.9. The time limits set out in this procedure will be followed. Where for good reason this is not possible, the student will be provided with an explanation for the delay and a revised timescale for completion.
- 1.10. Where a student being considered under this procedure believes that they should receive reasonable adjustments on the grounds of disability, this should be clearly stated to the relevant person depending on the stage of the case. This would include the reason for requesting the adjustment and any suggestions of what this may mean, for example an alternative format to a hearing or an extended deadline.
- 1.11. Students are strongly encouraged to seek advice and support such as from the Imperial College Union, Disability Advisory Service, personal tutor, or Department/Faculty Senior Tutor as appropriate.

## **2. Informal action**

- 2.1. Where a student is failing to engage with their studies in line with the expectations of their programme, the appropriate member of staff in relation to their studies such as their personal tutor, the programme director or supervisor will seek to contact them to explain their concerns and to offer support and guidance.
- 2.2. Where the student then provides information to explain their failure to engage, they should be supported to re-engage, such as catching up with any work that has been missed, applying for mitigating circumstances or

requesting an extension for any missed or upcoming assessment, or requesting an interruption of studies.

- 2.3. If informal action fails to elicit a response, or a return to engage with studies, then the formal procedures following will be invoked.

### **3. Undergraduate and taught postgraduate procedure**

- 3.1. Where a student's engagement falls below the requirements of the department, there has not been adequate response to any informal action taken by staff, and there is no indication that there may be grounds to consider the student's progress under other procedures such as [Fitness to Study](#) or [Fitness to Practise Medicine](#), the Department will invoke these formal procedures.
- 3.2. Formal correspondence will be sent to the student's Imperial email account warning the student that they are at risk of being withdrawn from their studies. This must outline the expectations for engagement, how the student has failed to meet these expectations and setting out a clear action plan as to how they must improve their engagement over a period of no less than 30 College working days (maximum of 40 College working days). The action plan should include details of any assessment activities in this period, and the consequences to the student of any assessment that they have missed previously. It must be clear that a failure to meet the requirements of the action plan will mean that the student may be withdrawn without further warning at the end of the period stated. If the student is subject to specific requirements to retain a valid visa, this should be reiterated to the student in the letter. The student will be provided with details of who, and how, they should contact if they experience any difficulties in meeting their action plan and be signposted to the relevant support mechanisms available. A copy will be provided to Student Records (through the relevant SRO team email address) and to International Student Support, if appropriate.
- 3.3. It is considered best practice to try to arrange a meeting with the student, to explain that they are at risk of being withdrawn from the programme and to encourage their full engagement. This should be held at the time of the correspondence above or soon after.
- 3.4. The department will agree which staff members will attend the meeting in addition to the student and their supporter. There will be two members of staff, one with responsibility for the academic expectations of the programme, and one to consider welfare and pastoral support. At this meeting support mechanisms should be highlighted to the student (pastoral support, mitigating circumstances etc.). If a meeting is successfully arranged, a copy of the

formal correspondence and action plan should be provided to the student in person, in addition to sending it by email.

- 3.5. When inviting the student to the meeting it must be clear what the purpose of the meeting is and that they may be accompanied by a 'friend'<sup>2</sup> to support them.
- 3.6. If there has been no response from the student within 5 college working days of the warning letter, the department should follow up in writing reiterating their concerns and the likely outcome if the student does not engage satisfactorily. A record of all attempts to contact the student (when, how and by whom) will be retained as part of the student file.
- 3.7. If, at the end of the warning period, the student has not met the minimum requirements of the action plan without providing sufficient extenuating circumstances, the Head of Department<sup>3</sup> will, in consultation with the Director of Undergraduate studies/ Postgraduate Studies and the Senior Tutor/ Department Postgraduate Tutor as appropriate, decide whether the student shall be required to withdraw from the College.
- 3.8. The decision will be reported to the Academic Registrar (by email to Student Records team through the relevant SRO team address) within 5 working days, for formal communication to the student within 10 working days.
- 3.9. The formal notification to the student of their required withdrawal will confirm:
  - That they are being required to withdrawn under this procedure and its effective date.
  - They have failed to meet the expectations of the action plan put in place.
  - Details of the appeal process and deadline (see section 6).
  - Notification regarding visa implications, as appropriate.
- 3.10. Where a student's engagement has improved sufficiently that they are permitted to remain on the programme, details of the actions taken will remain as part of the student file and may be referred to should the student's

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<sup>2</sup> A friend under these procedures refers to a member of the College community such as a fellow student, member of staff, Sabbatical Officer of the Imperial College Union, or member of the Imperial College Union Advice Centre.

<sup>3</sup> For undergraduate medical students the Head of the Undergraduate School is the Head of Department; the Head will consult with at least two staff drawn from among the Directors/Welfare Tutor as regards individual student cases

future actions fall below the expectations of the College with regards to their engagement with the programme.

#### **4. Postgraduate Research Student Procedure**

- 4.1. Where a student's engagement falls below the requirements of the department, there has not been adequate response to any informal actions taken by staff, and there is no indication that there may be grounds to consider the student's progress under other procedures such as Fitness to Study, the student's primary supervisor on behalf of the Department will invoke these procedures.
- 4.2. Correspondence will be sent to the student's Imperial email account warning the student that they are at risk of being withdrawn from their studies. This must outline the expectations for engagement, how the student has failed to meet these expectations and setting out a clear action plan as to how they must improve their engagement over a period of no less than 30 College working days (maximum of 40 College working days). The action plan should include measurable ways and the timescale in which the student's academic progress should be expected to improve. The student will be provided with details of who, and how, they should contact if they experience any difficulties in meeting their action plan and be signposted to the relevant support mechanisms available.
- 4.3. A copy will be provided to the Head of Department, Director of Postgraduate Studies, Departmental Postgraduate Tutor, and Student Records. Where appropriate it should also be copied to International Student Support.
- 4.4. It is considered best practice to try to arrange a meeting with the student to explain that they are at risk of being withdrawn from the programme and to encourage their full engagement. This should be held at the time of the correspondence or soon after.
- 4.5. The department will agree which staff members will be attending the meeting in addition to the student and their supporter. In addition to the student's primary supervisor to consider the academic expectations for their research, there will be a member of staff specifically in relation to welfare and pastoral support. At this meeting support mechanisms should be highlighted to the student (pastoral support, late case process). If a meeting is successfully arranged, a copy of the formal warning and action plan should be provided to the student in person, in addition to sending it by email.

- 4.6. When inviting the student to the meeting it must be clear what the purpose of the meeting is and that they may be accompanied by a 'friend'<sup>4</sup> to support them.
- 4.7. If there has been no response from the student within 5 College working days of the warning letter, the department should follow up reiterating their concerns and the likely outcome if the student does not engage satisfactorily.
- 4.8. If the student's academic progress during the warning period continues to be so unsatisfactory as to justify a withdrawal decision, the Department must notify the student of this fact in writing. If the student does not withdraw voluntarily, they will be required to appear before a department committee.
- 4.9. A departmental committee will be established as necessary by the Head of Department and should comprise the Head of Department, Director of Postgraduate Studies, and Department Postgraduate Tutor and, wherever possible, include a member of the academic staff of another department. The student will have the right to nominate a member of the academic staff of their own department to serve on the Committee. The Committee will hear both the student and their supervisor and will invite the student to refer to extenuating or other circumstances which, in the student's view, have affected their academic performance. The Committee will produce a written report on the student's academic performance and on any extenuating circumstances put forward.
- 4.10. The Head of Department, in the light of the Committee's report and such subsequent discussion with the student as they may deem appropriate, will decide whether or not the student shall be required to withdraw from the College.
- 4.11. If the decision is that the student is required to be withdrawn, this will be reported to the Academic Registrar (by email to student records) within 5 working days, for formal communication to the student within 10 working days. The Committee's report will also be submitted to the Academic Registrar via the Student Records Team (through the relevant SRO team email address). The formal notification to the student of their required withdrawal will confirm:
  - That they are being required to be withdrawn under this procedure following the decision of the Committee and the effective date of withdrawal.

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<sup>4</sup> A friend under these procedures refers to a member of the College community such as a fellow student, member of staff, Sabbatical Officer of the Imperial College Union, or member of the Imperial College Union Advice Centre.

- Details of the appeal process and deadline.
  - Notification regarding visa implications, as appropriate.
  - Include a copy of the Assessment Committee's report and any supporting documentation.
- 4.12. Where the decision of the Head of Department permits the student to remain on the programme, they may set conditions for continued study appropriate to the case, such as specific additional milestones or minimum expectations for contact with a named member of staff for academic or welfare purposes.
- 4.13. A failure to adhere to conditions placed on the student may mean that the case is returned to the committee for further consideration, without the requirement for a new warning letter.

## **5. Visiting or occasional students**

- 5.1. Where the College has accepted a visiting or occasional student this process will apply however, the timelines may need to be condensed in line with their period of study. For example, if a visiting student attending for a term or less, it will not be possible to provide a 6-week action plan following informal attempts to engage the student.
- 5.2. The relevant process above depending on level of study will be utilised. It is important to ensure that where relevant, the student's home institution is advised of concerns about a student's engagement, in line with exchange agreements.

## **6. Appeal process for all students**

- 6.1. All students required to withdraw under this procedure have the right to appeal this decision through the Academic Registrar to an Appeal Panel. This appeal relates to the decision and process that is followed cannot be used in relation to the outcome of individual assessments/ reviews.

### **Stage 1**

- 6.2. The deadline to raise an appeal is 15 working days from the notification to the student of the requirement to withdraw. An appeal must be in writing clearly citing and explaining the grounds for appeal and must include all relevant evidence to support the appeal. A copy of the notification email regarding the requirement to withdraw should also be included.

- 6.3. The eligible grounds for appeal are as follows:
1. There is new evidence of mitigating circumstances which the student could not have reasonably declared previously.
  2. The procedures have not been correctly followed (procedural irregularity).
  3. The decision to require withdrawal could be considered unreasonable in the light of the procedures and the evidence available at the time it was made (procedurally unfair).
- 6.4. The appeal will be assessed by a member of the student casework team. If, in their view, the appeal has been submitted on time and with sufficient grounds to be considered, it will be referred to the Head of Department to consider in conjunction with the Director of Undergraduate Studies/ Director of Postgraduate Studies and Senior Tutor/Departmental Postgraduate Tutor.
- 6.5. If the appeal is not accepted, this completes the procedures of the College and the reason(s) for this decision will be provided to the student in a Completion of Procedures letter (see section 5)
- 6.6. If the appeal is accepted, the Head of Department will cancel its previous withdrawal decision within ten working days. If the appeal is not accepted, the Department must in its written response address the points made by the student in their appeal and explain their decision. This will be provided to the student by the Student Casework Team. This should normally be provided to the Student Casework team within 10 working days of receipt of the appeal, to be provided to the student within a further 5 working days.

## **Stage 2**

- 6.7. If the decision at stage 1 was that the requirement to withdraw remains, the student may request that the decision about their withdrawal is reviewed by an appeals panel.
- 6.8. A request for the decision to be reviewed must be made in writing within 10 working days of the outcome of stage 1 being provided to the student. In their request the student should ensure that they provide any additional information/ comment to their original stage 1 appeal and outcome.
- 6.9. The request will be considered by the Academic Registrar (or nominee) and the Vice Provost (Education and Student Welfare) (or nominee) who shall decide based on the evidence provided whether or not there are grounds for an Appeal Hearing within 10 working days of its receipt. If an Appeal Hearing is not allowed, then a Completion of Procedures letter shall be issued.



- 6.10. The Appeal Committee shall consist of two members of the academic staff drawn by the Academic Registrar from a panel established by the Senate for that purpose, and one student representative nominated by the Imperial College Union President who shall be from a different Faculty to the appellant. The Chair of the Appeal Committee shall be an elected College Consul. The Appeal Committee will not include a member of staff from the appellant's Department. A Secretary for the appeal committee will be appointed from Registry.
- 6.11. The student will be invited to attend the Appeal Committee and the Department will be invited to send a representative to the hearing. Students may, if they wish, be accompanied by a 'friend' (member of Imperial College either a fellow student, or a personal tutor, warden or other member of the academic staff); the friend may speak in support of the student if requested.
- 6.12. All parties will receive a minimum of 10 working days' notice of the panel date. At the point of notification, all papers available to date will be shared with the student, the Department, and the Panel.
- 6.13. Written statements will be required from the Department as follows:
- a) A statement indicating in general terms the reasons which led the Department to require withdrawal and;
    - i) For a student following a taught programme, the statement should include details of any progress tests undertaken so far in the session, the student's results and coursework marks and their relationship to those of the class, together with the previous academic record within the College.
    - ii) For a student on a research programme, the statement should include details of the outcome of any milestones (such as ESA) and the status of any required elements for their programme.

The statement will be sent to the student at least 5 College working days before the hearing.

### **Conduct of the appeal hearing**

- 6.14. Both the student and the Departmental representative (if attending) will be before the Committee at the same time.
- 6.15. The Chair will explain that any statement provided about progress or lack therefore of by the student are taken by the Appeal Panel as given and that the Appeal Panel is only empowered to consider whether the withdrawal decision was unreasonable on one or more of the grounds listed above.

- 6.16. The normal process of the hearing will be as follows, but may be varied by the Chair as appropriate:
- a) The Chair will then invite the student to present their case.
  - b) The Departmental representative is then invited to put questions.
  - c) Members of the Panel may address questions to the student.
  - d) The Departmental representative will then make a statement of the Departmental view.
  - e) The student is then invited to put questions.
  - f) Members of the Panel may address questions to the Departmental representative.
  - g) The student is then invited to make any further comments they wish.
  - h) The student (and their 'friend' if present) and the Departmental representative are then asked to withdraw.
- 6.17. The Panel will then confer in private to decide if the appeal should be upheld. If the Panel consider that the student should be permitted to continue at the College, they may attach specific conditions to the continuance of their studies.
- 6.18. The Secretary to the Appeal Committee will inform the appellant of the Committee's decision in writing providing reasons for the judgement reached in relation to submissions made at the hearing, within ten working days of the hearing taking place.
- 6.19. The responsibility for hearing and deciding upon appeals is vested in the Senate and is delegated by the Senate to the Appeal Committees, whose decisions are final and will conclude the procedures of the College.

## **7. Completion of Procedures and the Office of the Independent Adjudicator for Higher Education Complaint Scheme,**

- 7.1. Imperial College is a member of the independent scheme for the review of student complaints run by the Office of the Independent Adjudicator for Higher Education (OIA). If a student is unhappy with the outcome they may be able to apply to the OIA for a review of the decision, provided their complaint is eligible under the OIA's Rules. More information about making a complaint to the OIA, the complaints it can and can't look at and what it can do to put things right if something has gone wrong can be found here:

<https://www.oiahe.org.uk/students>. The student will normally need to have completed this procedure before complaining to the OIA.

- 7.2. Once a student has completed the College's internal procedures, the College will issue the student with a Completion of Procedures Letter. If the student is still dissatisfied, the student may direct their complaint to the Office of the Independent Adjudicator within twelve months of the date on which the Completion of Procedures Letter was issued. Information on the complaints covered by the Office of the Independent Adjudicator and the review procedures is available at: <http://www.oiahe.org.uk/>.

## 8. Record keeping, Monitoring and Enhancement

- 8.1. A confidential record will be kept of the academic appeal and of the outcome of the case in order that themes in academic appeals submissions can be identified, addressed and improvements can be introduced.
- 8.2. An annual report of all withdrawal decisions will be provided to Senate which will provide details of the number, nature and outcomes of any students considered under these procedures. The report will also record any corrective action taken and identify any themes emerging from the consideration of cases and make recommendations for enhancements.

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