

# Concerns Policy

Faculty of Medicine and Health Sciences

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## Purpose

The purpose of the concerns process is to identify students at risk of being unsuccessful in their progression through medical education and to provide targeted support to them to mitigate the identified risk. The condensed and intensive nature of the medical course means that it is important to identify problems and associated support needs for individual students as early as possible to minimise the impact of those problems and to maximise opportunities for development. This policy, and the associated procedures document, outline how the medical school systematically monitors markers of risk at an individual student level and escalates monitoring and support to facilitate improvement and for as many students as possible, successful progression to the next stage of study and completion of the course.

## Scope

This policy is relevant for students registered on the MB ChB course at all stages of study. It specifically addresses incidences where specific indicators of risk to success are present. Potential risks to success include a variety of markers of academic progress and performance as well as inappropriate behaviour/conduct, poor engagement, ill health, and any other concern that requires monitoring and/or action by the medical school and/or where student remediation requirements exist. This policy serves as a comprehensive framework for identifying, addressing, and mitigating risks to facilitate the overall well-being and progression of students through their medical education.

The concerns process is separate to the fitness to practise process. However, students may be referred into the fitness to practise process from within this policy if the relevant thresholds have been met.

## Regulatory context

This policy and accompanying procedures are based on guidance provided by the General Medical Council (GMC), with reference to relevant legislation and regulations for the MB ChB course. The key external documents informing this policy are listed below:

- [GMC: Outcomes for graduates](#)
- [GMC: Achieving Good Medical Practise](#)
- [GMC: Welcomed-and-valued](#)
- [GMC: Standards for medical education and training](#)
- [GMC: Professional Behaviour and Fitness to Practise](#)
- [GMC: Raising and acting on concerns about patient safety](#)
- [Equality Act 2010](#)
- [Data Protection Act 2018](#) (The UK's implementation of GDPR)

The MB ChB regulations document can be found here: [General Regulations](#)

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## Policy statement

The university recognises that students will have a variety of backgrounds, skills and experiences on arrival at medical school, as well as the unique experiences they undergo throughout their studies. Consequently, students may progress in their studies at different rates both compared to their peers and in different aspects of their training.

All students will have access to universal student support systems within the faculty and wider university (e.g., disability, welfare, pastoral, and academic support) and will be encouraged to self-refer to relevant services whenever these may be beneficial to them. Students do not need to enter the concerns process in order to access universal support (see Figure 1 below).

The MB ChB course is condensed and intensive and the medical school aims to identify any areas of difficulty for the student as early as possible to maximise opportunities for development. Where there are specific markers of risk that may represent a barrier to current or future progress, or where there are repeated, worsening or more serious difficulties, students will be monitored and supported individually through a concerns process.

It is expected that students will self-report any known difficulties affecting their studies to the medical school. In addition, the medical school will collect a variety of cohort-level metrics and consider students who fall below expectations. However, there are many potential markers of risk associated with poor student outcomes and therefore anyone who is concerned about a student's ability to function or progress as a medical student or future doctor for any reason can also refer a student into the concerns process by raising a concern. This includes staff within the university or placement location, fellow students, as well as patients or other members of the public.

The medical school will work with students for whom concerns have been raised to identify the root cause(s) and to support students to mitigate risks to their medical education. The concerns process is intended to be supportive in nature and therefore students will be advised (and in some cases may be required) to access the relevant university support resources as part of managing any concerns that have been raised.

Concerns will be broadly grouped into three categories of health, academic and professionalism. Individual students may have concerns in one or more of these categories at any time and the faculty will have processes in place to enable concerns in different categories to be managed independently where appropriate. Health concerns in particular should be managed independently of academic and/or professionalism concerns wherever possible.

The university welcomes students with health conditions and disabilities and recognises that these do not constitute a risk to progress if the student demonstrates appropriate insight, seeks appropriate medical advice and complies with treatment. Concerns in the health category are therefore not simply for students with health conditions, but where a student's health, or their management of their health, is impacting on their ability to study or their ability to meet the expectations of the course in some way.

Concerns will be triaged by a panel of staff and allocated to one of three levels of risk (defined below) that represent increasing severity, complexity and/or longevity of the situation and an associated escalation of individual monitoring, support and remediation activities. The university acknowledges that high levels of risk may not inherently indicate a high level of fault on the part of

the student, and it is important to note that the primary aim of the concerns process at all levels is to support students to make progress in their studies and ultimately, to become better doctors.

The faculty will put in place mechanisms to advise students as to appropriate remediation strategies and to review concerns and remediation progress on a regular basis. As part of concern management, students may receive mandates for training, reflection, action planning, engagement with internal or external support providers, or other obligations on their time. These requirements are designed to help the student to understand the reasons for and implications of the concerns. The overarching objective is to facilitate remediation, aligning their progress and practice with the expectations of medical students.

In the event that student-led actions and/or supportive interventions prove insufficient to yield the necessary improvement or development, actions of a more disciplinary nature may be incorporated into the concerns process. Typically, such measures will be reserved for higher levels of concern, particularly when addressing serious behavioural, professionalism, or safety issues.

Concerns at the uppermost level (level 3) are considered to have entered a “formal low level concerns process” for GMC declaration purposes. Students at this level may be referred on to the Fitness to Practise process where the relevant GMC thresholds have been met (see Fitness to Practise policy). In alignment with the criteria specified in the MB ChB regulations, students at this level may either additionally or alternatively be referred to the Dean of FHMS for consideration of a repeat period of study or compulsory withdrawal from the course.

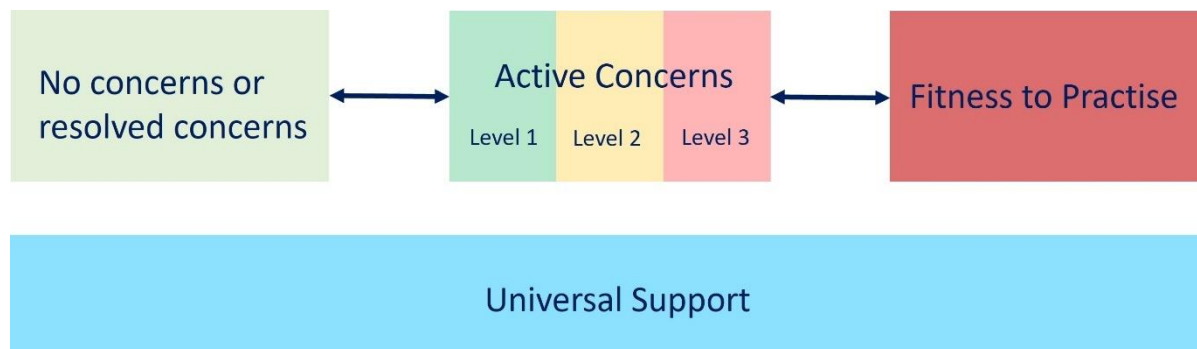


Figure 1. Relationship between the concerns process, universal support and fitness to practise

The university recognises that some concerns, particularly those in the professionalism category may consist of an element of subjectivity. It is therefore important that students are notified of concerns and have an opportunity to present an alternative viewpoint. However, the remit of the concerns process is not to establish specific areas of guilt or innocence but instead to encourage reflection and personal development in students. This is applicable even when there is disagreement between individuals and as such, there is no right of appeal in relation to concern content. However, if a student disagrees with required remediation actions, the faculty will consider alternatives proposed by the student where they achieve the same aim. Should a student progress through the concerns process to the point of withdrawal from studies, the student will have the right of appeal.

The concerns process is intended to be supportive in nature and students will be referred to relevant university support resources as part of managing any concerns that have been raised. Additional pastoral support for students with concerns is available within the faculty via personal tutors and the faculty's universal support team. In addition, pastoral support that is independent of the faculty is available through the wellbeing skills and diversity team.

## Responsibility

All staff are responsible for:

- Referring students who they believe to be in need of pastoral, academic and/or professionalism support to the faculty student support team. Wherever possible, this should be discussed with the student at the time the potential support need is noted.
- Referring students who they believe to have repeated, worsening or substantial support needs in any category directly into the concerns process.
- Raising concerns if they believe a student may be unfit to practise and/or that there may be risks to safety of staff, students or patients.

All students are responsible for:

- Self-referring to the faculty student support team and other relevant support services when they are aware of any potential barriers to engagement or progress on the course.
- Engaging with staff involved in the concerns process and relevant support services as necessary when concerns are raised.
- Maintaining a personal development plan that includes reference to any concerns that have been raised and actions aimed at addressing them.

The pending concerns triage (PCT) group are responsible for:

- triaging new concerns and allocating them to a category and level.
- identifying an individual to lead on management of the concern and arranging the relevant support for the student.
- Reviewing unresolved individual concerns on a regular basis and escalating, de-escalating or resolving where appropriate.

Progress panels are responsible for:

- Reviewing the broader concerns profile of individual students with unresolved academic and/or professionalism concerns on a regular basis.
- Agreeing appropriate academic and professionalism support for the student and making the relevant referrals.
- Agreeing appropriate actions required of students.
- Communicating review outcomes to students and monitoring progress and performance against action plans, learning agreements and other documents as appropriate to the situation.

The Concerns Committee are responsible for:

- Reviewing concerns profiles and remediation submissions of students with level 3 concerns in any category and resolving concerns where satisfied that the issues have been successfully remediated.

- Where remediation is not yet satisfactory, making recommendations for further remediation activities and issuing warnings or conditions of continued study where appropriate.
- Assessing whether, on a case-by-case basis the FtP threshold has been reached and if so, making a referral to the FtP procedure.
- Monitoring any undertakings or conditions that have been agreed as part of the FtP procedure and reporting back to the FtP secretary as necessary.
- Referring students to the Dean where the criteria outlined in the MB ChB regulations have been met for a repeat period of study, compulsory suspension of studies or compulsory withdrawal from the course.

The Student Support Domain Lead is responsible for:

- Ensuring that overall functioning of the student support team in relation to student concerns is in line with this policy and accompanying procedures document.
- Meeting the reporting requirements of the GMC in relation to student concerns and FtP processes.
- Reporting to relevant examination boards any students with concerns that remain unresolved at the point of potential graduation.
- Ensuring that STEP forms submitted to foundation schools are an accurate reflection of a student's support needs and provision during their time at medical school.

## Data Management

Details of concerns will be held on record throughout the student's time on the course and for no longer than is required by the Data Protection Act 2018 (UK's implementation of the General Data Protection Regulation (GDPR)). Relevant information from the concerns record will be included in any referral to the fitness to practise process and/ or the university conduct team and may be shared with other areas of the university either alone or as part of the broader student support record where this is relevant to other policies, processes or institutional obligations e.g., appeals, visa sponsorship. To maintain student confidentiality, feedback will not normally be provided to people who have raised concerns.

Information from the concerns records may be provided to appropriate authorities such as the GMC where this forms part of the registration or subsequent monitoring process for professional practise or is required to meet the medical school's licencing and accreditation requirements. Information held within the concerns process should not be shared with external agencies for other purposes except in extreme and/ or emergency situations where this is considered necessary for safeguarding purposes or where it is required to meet the university's legal obligations.

## Definitions

**Marker of risk:** This refers to any indicator that the student has not met or may struggle to meet the expectations of the course. These could be cohort level formal records of progress such as assessment scores (formative and summative), engagement records, mandatory training records and

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educational supervisor reports. Markers of risk can also be identified at an individual level such as within patient/staff/student feedback or through observed behaviours.

**Universal support:** This refers to support services and processes across the faculty and wider university available to all students on the course. Access to these services is optional and usually student managed via self-referrals and staff signposting.

**Concerns process:** This refers to the identification of, and monitoring and supporting of, specific individual students with one or more markers of risk to long term success on the course. Monitoring is led by staff within the student support domain and students may be issued with individual guidance, recommendations and/or requirements for engagement with specific support services to facilitate improved chances of long term success.

**Level 1 concern:** This refers to relatively low-level risks to the student's long term success if improvements are made in the near future but there is a requirement for monitoring or supportive intervention by the medical school to prevent a longer term impact.

**Level 2 concern:** This refers to repeated and/or more extensive or complex adverse behaviours or outcomes that represent a more substantial or longer-term individual risk to success that is likely to require ongoing individual support and/or active remediation efforts.

**Level 3 concern:** This refers to more complex risks to success that are likely to persist in the medium to long term even with support in place. Successful remediation may require extensive or bespoke support and/or proactive efforts from students over a significant period of time. Concerns at level 3 are considered to have entered a "formal low level concerns process" for GMC declaration purposes.

**FtP threshold:** The point at which a student's behaviour, attitude, health or probity calls into question their ability to practise safely and effectively rather than be managed by on-going support from tutors, student services or occupational health. The threshold can be crossed in a single incident or after the accumulation of a number of low-level events and may also be the result of educational remediation that has failed to resolve the issue. Specific thresholds are reference within the University's FtP policy and GMC publications listed above.

## Related policies

1. Fitness to Practise policy.
2. Reasonable adjustment policy.
3. Absence and leave policy.
4. Phase 1 Engagement policy.
5. Phase 2 Engagement policy.

## Document Control

Date policy approved: January 2024

Date of policy review approval:

Date of next policy review: Academic year 2024/25