

Policy on Sexual Misconduct, Harassment and Unacceptable Behaviours

Appendix C: Precautionary Measures for Students

This appendix outlines the procedures for implementing precautionary measures under IFG's **Policy on Sexual Misconduct, Harassment & Unacceptable Behaviours**. Precautionary measures are emergency actions taken to safeguard individuals and uphold the integrity of investigations following allegations of misconduct.

1. Scope of Precautionary Measures

Precautionary measures apply exclusively to students of IFG. They may be imposed when allegations arise that indicate a possible breach of the Policy. These measures are not disciplinary sanctions and do not imply a presumption of guilt. They are used to:

- Protect individuals involved;
- Prevent interference with an investigation;
- Manage risk appropriately.

Each case will be considered on its individual merits.

2. Definitions

- **Exclusion:** Restriction from accessing specified buildings, resources, or individuals.
- **Suspension:** Temporary prohibition from participating in institutional activities, which may include academic work and external placements. Exceptions for assessments, or alternative arrangements, may apply on a temporary or ongoing basis.
- **Conditions:** specific arrangements put in place on a temporary basis to support the management and investigation of allegations. Conditions imposed as a Precautionary Measure may, where appropriate, be taken forward as set expectations for behaviour in accordance with the Non-Academic Misconduct Policy.

3. Types of Precautionary Measures

IFG may implement one or more of the following:

- No-contact conditions (including digital and indirect contact);
- Restrictions on use of or access to facilities or individuals;
- Full or partial exclusion from physical or digital spaces;
- Full or partial suspension from study-related activities;
- Emergency alternative arrangements for assessments (including adjustments to assessment rubrics, methods, timings, locations and any other adjustments deemed reasonable by IFG)

4. Delegation of Powers

If the Academic Director (**CEO**) is unavailable, an appropriately designated [**Director of Studies**] may exercise the same powers under this policy.

5. Procedure for Imposing Precautionary Measures

1. Allegation received by IFG.
2. Risk assessment is conducted (e.g. using an internal template).
3. Referral form prepared by the Director of Studies with relevant documentation.
4. CEO (or delegate) reviews the case and determines appropriate action.
5. Student is informed in writing of:
 - The measures imposed;
 - Reasons for the decision;
 - Duration (initial maximum of 21 days, thereafter can be extended to 2 month periods);
 - Right to representation;
 - Timeframe for review.

5. Prevent Duty Consideration

If allegations indicate potential risks under the **Prevent Duty** (e.g. radicalisation or extremist behaviour), IFG may refer the case to its safeguarding or Prevent lead. This is in accordance with obligations under the **Counter-Terrorism and Security Act 2015**.

6. Legal Notification and Rights

Students must be:

- Informed in writing of the nature of the allegations that have led to the need to impose Precautionary Measures, and advised of the legal implications (see the Policy, Section 'Notification of Legal Implications' for further information);
- Reminded of their right to remain silent should they choose, and that this is without prejudice;
- Told that no inference will be drawn from a choice by a Respondent not to respond to allegations;
- Advised of avenues of support and advice;

Provided with a timeframe to respond in writing.

7. Student Optional Interview and Written Representations

The measures will be imposed from the date of written notification to the student who has them imposed, and students will be invited in that initial notification to provide written representations to the CEO in response to the imposition of Precautionary Measures.

At any and each further imposition of Precautionary Measures following a review, students will be offered the opportunity to submit written representations on the following grounds:

- a) If the Precautionary Measures previously imposed are increased, and that change has a demonstrable negative impact on the student;
- b) If the student's circumstances change warranting consideration in light of the Precautionary Measures imposed.

However, at the discretion of the CEO or their nominee, students may be invited to meet with the CEO or their nominee with regard to Precautionary Measures for one or more reasons:

- To assist in assessing risk;
- To offer an initial response to allegations;
- To request adjustments to the imposed measures.

They will be given reasonable notice and may be accompanied by a representative or adviser, and/or a friend, family member or a member of staff for support.

8. Review and Expiry of Measures

Precautionary measures:

- Initially apply for up to 21 days;
- May be initially extended in 2-month increments if justified, until such time as it would foreseeably be unreasonable to do so, at which point they may be imposed for a longer period (but still subject to a period of review of normally not longer than six months);
- May be amended, lifted, or replaced following review;
- Must be reassessed prior to expiry.

Students can submit new written representations at any time in light of changing circumstances.

9. Failure to Comply

Non-compliance with precautionary measures may lead to formal action under the **Non-Academic Misconduct Policy**.

10. Appeals and Complaints

A student may:

- Submit an appeal regarding precautionary measures, and they will be notified of how to do this in the letter confirming the imposition of Precautionary Measures;
- Request a Completion of Procedures letter if unsatisfied with the response, in order to submit a complaint to the **Office of the Independent Adjudicator (OIA)**.

11. Timescales

- Measures take effect upon written notification;
- Written responses to student representations will be provided within 5 working days where possible;
- Students have 14 days from notification to submit a response;
- Reviews of long-term measures (over 2 months) may be managed through the **Support Through Studies** process.

13. Confidentiality and Record-Keeping

- Only those necessary for implementation and safeguarding are informed.
- Complainants may be told that precautionary measures are in place, but not the details.
- Data is managed in line with GDPR.
- Records are kept for:
 - 2 years after graduation;
 - Up to 6 years if the student withdraws mid-process.

14. Monitoring and Assurance

Anonymised records of all precautionary measures are retained for:

- Quality assurance;
- Policy review;
- Institutional oversight.

Please see next page for a simple procedural flowchart:

15. Flowchart: Summary of Precautionary Measures Process

