

UAL Supplementary Policy Guidance

Safe and Inclusive Online Learning

Introduction and aims

Right now, with the challenges of Covid-19 and the rapid move to remote teaching, we need to work in a coordinated and cooperative way to support all students and staff. This Supplementary Policy Guidance on Safe and Inclusive Online Learning has been designed for our whole community of students and staff, working in partnership, to help us all adjust to new and unfamiliar ways of working. It aims to clarify the relative responsibilities of everyone involved in learning and teaching alongside meeting the need for clear guidance and support.

This guidance has three aims:

- To draw attention to and encourage reflection on the University's existing policy framework* concerning safe and inclusive learning, and to remind staff and students of its centrality to our mission as a caring and safe institution of further and higher education where the safety of all students and staff is everyone's responsibility.
- To supplement the University's existing policy framework* in response to moving en masse to distributed and blended modes of instruction and practice to ensure that existing policies are better understood in this new and emerging context.
- To fortify our commitment to promoting an atmosphere of safety for enquiry and experimentation, and ultimately to support students and staff to maintain safe and inclusive teaching and learning environments and practices for all.

This guidance shall be effective immediately and remain active for a minimum of ##, following which it will be evaluated and formally incorporated into the University's existing policy framework.

* *UAL's existing policy framework consists of University-specific local and sector-specific national regulations and guidance:*

- [UAL Online Student Engagement Policy](#)
- [UAL and Arts SU Student Charter](#)
- [UAL Disciplinary Code for Students](#)
- [UAL Public Sector Equality Duty](#)
- [UAL Safeguarding Policy](#)
- [UAL Student Privacy Policy](#)
- [UAL Tutorial Policy](#)
- [UAL Dignity at Work Policy](#)
- [UAL Tell Someone: report and support](#)
- [LCC Academic Progression Tool](#)
- [EHRC guidance on Freedom of Expression](#)
- [EHRC report on Tackling Racial Harassment](#)

Safeguarding Policy

This policy starts by stating its commitment to 'providing a safe and secure environment for all students, staff and visitors' and that 'in any given situation, the welfare of students (especially children or vulnerable adults) is paramount'. Under statutory safeguarding terms it is the university's 'duty to support staff and students (through guidance, support and training) and to promote safe working practices in order to minimise risk to vulnerable individuals' which includes children and 'any person over the age of 18, who is or may be in need of community care services by reason of mental or other disability, age or illness'. The policy states that whilst 'it is neither the role nor responsibility of those working with students at UAL to assess, diagnose or investigate whether a student is at risk of or is suffering harm... it is the responsibility of all staff to be aware of the need to report any concerns about a student to the Designated members of staff'.

**'a safe and secure
environment for all
students, staff and
visitors'**

Guidance for the current situation: It would be reasonable for designated members of staff to proactively enquire about student's current circumstances. It is also the University's [Public Sector Equality Duty](#) to remove or reduce disadvantage that students face as a result of any protected characteristic, and the UAL [Student Privacy Policy](#) and [Tutorial Policy](#) both state that information provided by students will be used to support their welfare and progress.

- Consider asking students regularly how they are, how well they are set up to study, if they have any questions or concerns etc.
- Consider how you can reduce disadvantage by arranging support for students or actively signposting them to support.
- Consider how you can use existing information provided by students to anticipate or identify the support they might need at this time

Student Charter

The UAL and Arts Student Union [Student Charter](#) states that the University should consult students ‘fully before making major changes that may affect [their] studies’ and ‘use a range of methods to hear students’ ideas and concerns’. It states that students should ‘tell a tutor or contact the support services when [they] encounter a problem’ and to ‘voice ideas and concerns, including through evaluations, students’ surveys, student representatives, and the complaints procedures’. The Colleges sent out surveys to students to assess their ability to continue their studies remotely, offering them the chance to express concerns. Some students may be more vulnerable and suffering more disadvantage as a result of the current circumstances and might not even be able to receive or complete the survey.

‘use a range of methods to hear students’ ideas and concerns’

‘tell a tutor or contact the support services’

Guidance for the current situation:

- Consider the suggestions offered above for identifying students, and follow the steps of the new [Online Student Engagement Policy](#) to firstly email those students followed by phone or text message after one week.
- Check the methods you are currently using to reach out to students are accessible and comply with GDPR and the [Student Privacy Policy](#). If not, consider when and how to switch to UAL’s specified methods.

Disciplinary Code

The UAL [Disciplinary Code for Students](#) is breached if a student 'engages in any conduct that prevents, obstructs or disrupts... teaching, learning' or does not comply with regulations relating to 'Equal Opportunities and the use of emails, software' etc. It is also breached if a student 'behaves in a disruptive or violent manner in learning and teaching or social environments' or 'engages in communication with staff or other students which is offensive or slanderous'. The advice for creating safety in online teaching, with regard to student behaviour, is for online activity to be supervised or moderated by tutors, but not all learning activity involves tutors.

Guidance for the current situation:

- Consider how group or peer-to-peer activity online can be set up to promote positivity and safety for those participating.
- Consider embedding guidance into your Moodle pages and teaching materials, including a link to and discussion around the UAL webpage on creating [positive online collaboration](#)
- Consider how to maintain [Freedom of Expression](#) in online teaching whilst also ensuring participants are protected from offence, harm and in particular [racial harassment](#)

Reporting procedures

Existing procedures for students and staff to report instances of bullying, harassment and harm in online, distributed and blended learning and working environments are still applicable.

- For all students (FE, Undergraduate and Postgraduate), guidance on reporting is available on the University's [Tell Someone: report and support](#) webpage.
- For staff, guidance is available on the University's [Staff Diversity and Inclusion](#) webpage and in relation to the University's [Dignity at Work Policy](#).

Scenarios and potential responses

The following table has been compiled to illustrate some of the potential scenarios that students and staff may face, their possible consequences, and suggestions for mitigating those. It is certainly **not** exhaustive. Please discuss other questions and/or concerns with staff on your course teams, who should compile these along with course-appropriate suggestions for mitigating them, before referring to the Designated Safeguarding Contacts (see Appendix 1 of [Safeguarding Students UAL Policy July 2019](#)).

What could happen and why?	What could happen as a result?	How could you mitigate this?
<p>1. Someone records the session without the knowledge and/or permission of the other attendee (one-to-one tutorials) or attendees (group learning activities, e.g. seminars).</p>	<ul style="list-style-type: none"> - Breach of GDPR; students and staff feel unsafe engaging in online learning; students and staff become demotivated; personal data is stored and disseminated and proliferates without the knowledge and/or permission of those who have been recorded; fines and/or prosecution for breach of GDPR; distress and/or injury to staff and students. 	<ul style="list-style-type: none"> - Staff do not record one-to-one sessions with students, either in photographs, video or audio. - Students, with the explicit permission of staff, may record a one-to-one session and retain it for only as long as needed for learning. They do not share the recording. - Staff inform students that the group learning activity will be recorded, inform them of what this means in practice (i.e. how it will be recorded, stored and used; how long it will be stored and used for; students must not share it or store it for longer than needed for learning), checks understanding, and gains consent of all present. - If it will not be recorded, staff clarify to all attendees at the start of the session that it will not be recorded and that none of the attendees should record it.

What could happen and why?	What could happen as a result?	How could you mitigate this?
<p>2. Someone shares the Blackboard Collaborate link because they have access to it and do not see any risk in sharing it.</p> <p>3. Someone (potentially external to UAL) changes the status of the tutor to 'Participant', effectively locking them out of the room, and takes control of the session because they entered the room with 'Moderator' privileges.</p>	<ul style="list-style-type: none"> - Persons external to UAL use the link and access the learning session, leading to surplus attendees and disrupting learning. - Persons other than staff use the link to access the room outside the time of the event and run their own events or share their own content in a Blackboard room created by UAL. - Students and staff feel that learning online is unsafe or unregulated; students become reluctant to engage in online learning; students feel disconnected from one another. 	<p>Guidance</p> <ul style="list-style-type: none"> - Staff ask students and colleagues not to share Blackboard links. - If people don't know how to access the link, students/staff should direct the person who needs it to the location (e.g. <i>Moodle</i>) where they can access it themselves. - Use your given name (as enrolled) in order to be identified. <p>Moderation of rooms</p> <ul style="list-style-type: none"> - Staff check attendee list and remove anyone who is not on the course. - When welcoming students to the room, staff ensure all attendees are set as <i>Presenters / Participants</i> as they enter.
<p>4. Someone speaks or behaves inappropriately in a session or breakout room either by accident or because they are unfamiliar with learning online, or are unaware of how their words and behaviour may affect others, or intend to disrupt learning, or the session is unmoderated.</p>	<ul style="list-style-type: none"> - Students are distracted or distressed by words/behaviour; students are reluctant to engage in online learning; students feel disconnected from one another. 	<p>Advice and training</p> <ul style="list-style-type: none"> - Students and staff co-create a 'framework of participation and engagement'. - Staff provide guidance about standards of behaviour in line with advice for face-to-face learning in existing policies. - Provide advice and training to staff about ways to handle this (e.g. investigate and/or challenge the words/behaviour).

What could happen and why?	What could happen as a result?	How could you mitigate this?
<p>5. Someone feels nervous either because the room in which in which a student or member of staff is sharing their video or because elements of the subject matter being discussed/shown contain something that is inappropriate in that person's current learning context.</p> <p>6. Someone feels isolated and vulnerable in an online learning event because they feel excluded from the learning event or because someone else's behaviour or language alienates or distresses them.</p>	<ul style="list-style-type: none"> - Students are distracted or distressed by, or complain about, issue; students are reluctant to engage in online learning. 	<p>Advice and training</p> <ul style="list-style-type: none"> - Students and staff co-create a 'framework of participation and engagement'. - Provide advice and training to staff and students about: (a) awareness of cultural sensitivity and most effective ways to set up one's working space in order to study/teach online; (b) awareness of how to review materials and consider how it may be received in different contexts; (c) ways to handle discomfort / distress / concern (e.g. how to recognise change of mood/attitude in order to respond; how to record and report incidents and seek support/advice).
<p>7. A student is attempting to continue their studies in a country where most of our platforms are prohibited. They decide (or are advised) to use illegal software to access their UAL email and when they do communicate with staff and students outside of their country, they fear it will be intercepted.</p>	<ul style="list-style-type: none"> - Students will not be able to continue engaging with such platforms and miss out or may be at risk of prosecution for using such platforms. 	<p>Advice and training</p> <ul style="list-style-type: none"> - Staff reinforce to students and colleagues that observing local laws and customs is essential. - Where students are unable to access their course materials, they inform staff so that a study plan can be devised.

What could happen and why?	What could happen as a result?	How could you mitigate this?
<p>8. Laws protecting and determining freedom of speech and expression vary across the globe. Our courses encourage students to be critical thinkers, to investigate, interrogate in a way that is permitted under UK law (with the exception of work triggering the UK Prevent Act). Continuing to produce such work may be unlawful and highly risky for students in certain countries.</p>	<ul style="list-style-type: none"> - Students will not be able to continue making such work for fear of prosecution. - Self-censored work may not gain such a high grade under our current criteria etc. unless learning outcomes can be adapted to accommodate the political and legal contexts some students have had to return to. 	<p>Advice and training</p> <ul style="list-style-type: none"> - Staff give students multiple opportunities to discuss learning and assessment and share their concerns. - Staff consider these issues seriously to craft approaches to learning, teaching and assessment decisions which fairly take them into account, recognising that needs may change from session to session, week to week. - Staff reassure students that working differently will not penalise them, and encourage them to share their experiences, questions and/or concerns about learning, teaching and assessment so that staff can respond adequately. - Provide advice and training to staff and students about ways to handle discomfort / distress / concern (e.g. how to recognise change of mood/attitude in order to respond; how to record and report incidents and seek support/advice). - Staff ensure students know the updated Extenuating Circumstances Policy.
<p>9. Some students miss chunks of their programme due to disruption, illness or death caused by the pandemic or having to take on additional responsibility at home. If and when they can re-engage they will be behind, which might make group discussions difficult and anxiety-inducing if other students appear to be steaming ahead and discussing things they haven't yet learnt.</p>	<ul style="list-style-type: none"> - Some students may internalise this, lose their confidence and disengage again. - Others might recognise this as unfair and unjust and take issue with the programme. 	
<p>10. Some of the methods of learning online involve various screens, tools and simultaneous dynamic activity which is not a productive or pleasant experience for a number of people. This can be particularly uncomfortable and risky for students and staff who are neurodiverse.</p>	<ul style="list-style-type: none"> - Some students become distressed and/or fatigued, which in the online space may not be evident to staff and/or students. 	