



QAHE Limited Fitness to Study Policy

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1. Introduction

QAHE Limited (QA Higher Education) is committed to fostering a safe, inclusive and supportive learning environment in which all students are able to engage effectively with their studies and wider student life. The Fitness to Study Policy supports this commitment by providing a clear and consistent framework for responding to situations where a student's health, wellbeing or behaviour may be impacting their ability to study, live independently, or participate appropriately within the academic community.

This policy reflects QA Higher Education's values of respect, fairness and student wellbeing, while recognising its responsibility to balance compassionate support for individual students with its duty of care to the wider learning community. It promotes early intervention, appropriate support and reasonable adjustments wherever possible, while ensuring that risks to the student, other individuals and the institution are identified and managed effectively.

The Fitness to Study Policy also supports QA Higher Education's compliance with relevant regulatory and legislative requirements, including the Office for Students (OfS) Conditions of Registration, the Equality Act 2010, health and safety legislation, data protection requirements, and broader expectations around safeguarding and student support. By establishing a structured and proportionate process for managing complex and high-risk situations, the policy helps to mitigate institutional risk, ensure consistency in decision-making, and maintain academic standards and a safe learning environment.

2. Policy Ownership

This Fitness to Study Policy is owned by QA Higher Education. Overall accountability for the policy rests with the Assistant Director of Safeguarding, Student Life and Wellbeing, who has strategic responsibility for safeguarding, student wellbeing and the effective management of risk across the institution.

Day-to-day responsibility for the implementation, oversight and operational management of this policy sits with the Learning Support Manager. This includes ensuring the policy is applied consistently and fairly, overseeing risk assessment processes, coordinating with academic and professional services teams, and ensuring that appropriate support and interventions are in place for students.

The Assistant Director of Safeguarding, Student Life and Wellbeing will retain oversight of the policy's effectiveness and regulatory compliance, supported by the Learning Support Manager, and will ensure that the policy is reviewed regularly or in response to legislative, regulatory or operational changes.

3. Scope

This policy applies to all students registered with QA Higher Education, as well as applicants to QA Higher Education programmes where concerns arise that may impact their ability to engage safely and effectively with study or student life.

The Fitness to Study Policy may be applied where there are serious concerns that a student's or applicant's health, wellbeing or behaviour is adversely affecting, or may adversely affect, their ability to study, manage the demands of student life, or where there is a potential risk to themselves, others, or the wider QA Higher Education community.



This policy does not address matters of academic performance, attendance or mitigating circumstances, which are managed through separate processes. It does not replace QA Higher Education's Student Disciplinary Regulations, safeguarding procedures or emergency response arrangements, which may be applied alongside or instead of this policy where appropriate.

The policy is intended for use where concerns are assessed as serious or potentially serious, and QA Higher Education reserves the right to initiate the procedure at any stage where the level of risk or individual circumstances require it.

4. Definitions

4.1. Fitness to Study

A student's ability to engage safely and effectively with their studies and the wider demands of student life, including living independently, behaving appropriately within the academic community, and not posing a risk to themselves or others.

4.2. Student

Any individual registered on a QA Higher Education programme, regardless of mode, level or location of study.

4.3. Applicant

Any individual who has applied for admission to a QA Higher Education programme, whether or not an offer has been made or accepted.

4.4. Risk Assessment

A structured process used to identify, assess and monitor potential risks to the student, other individuals, and QA Higher Education, including risks to health, safety, wellbeing and academic continuity.

4.5. Supportive Interventions

Any informal or formal action taken to support a student, including engagement with student wellbeing services, learning support, reasonable adjustments, or referral to external support services.

4.6. Student Welfare Risk Panel

A panel convened under Stage 2 of the Fitness to Study procedure to review concerns, assess risk, and agree appropriate actions or recommendations to support the student and manage identified risks.

4.7. Formal Review Panel

The Student Welfare Risk Panel convened as a standalone meeting to consider serious or high-risk Fitness to Study cases (Stage 3). The Panel may include representatives from relevant academic or professional services and determines proportionate outcomes based on available evidence.

4.8. Reasonable Adjustments

Changes or support provided to enable a student or applicant with a disability or long-term health condition to engage effectively with study, in line with the Equality Act 2010 and subject to what is reasonable and proportionate.



4.9. Duty of Care

QA Higher Education's legal and ethical responsibility to take reasonable steps to safeguard the health, safety and wellbeing of its students, applicants, staff and wider community.

4.10. Safeguarding

Measures taken to protect individuals from harm, abuse or neglect, including risks arising from physical or mental health concerns.

4.11. Confidentiality

The obligation to handle personal and sensitive information relating to a student or applicant in a respectful and lawful manner. Information will be shared only on a need-to-know basis and in accordance with data protection legislation, safeguarding requirements, and QA Higher Education's duty of care, including where disclosure is necessary to protect the individual or others from harm.

5. Policy Statement

QA Higher Education is committed to providing a safe, supportive and inclusive learning environment for all students and applicants. All students and applicants are expected to engage with their studies and student life in a way that does not place themselves or others at risk and that supports the wellbeing of the wider academic community.

Where concerns arise about a student's or applicant's health, wellbeing or behaviour, QA Higher Education will respond in a fair, consistent and proportionate manner. Individuals are expected to engage appropriately with the Fitness to Study process and with any reasonable support or actions put in place to address identified concerns.

QA Higher Education will prioritise early intervention, support and reasonable adjustments wherever possible. However, behaviour or circumstances that present a serious or ongoing risk, cause significant disruption, or where an individual is unwilling or unable to engage with support, may result in formal action under this policy. This may include monitoring, conditions on study, temporary suspension or other appropriate outcomes.

All decisions made under this policy will be guided by the principles of safeguarding, confidentiality, equality and the maintenance of academic standards, and will be carried out in line with relevant legal and regulatory requirements.

6. Responsibilities

6.1. QA Higher Education

QA Higher Education has a responsibility to provide a safe, inclusive and supportive learning environment. It will ensure that concerns relating to fitness to study are identified, assessed and managed in a fair, consistent and proportionate manner, in line with this policy and relevant legal and regulatory requirements.

6.2. Executive Board

The Executive Board holds ultimate oversight of the Fitness to Study Policy. It is responsible for ensuring that the policy aligns with QA Higher Education's strategic objectives, risk management framework and regulatory obligations, and for receiving assurance that the policy is implemented effectively and reviewed regularly.



6.3. Assistant Director of Safeguarding, Student Life and Wellbeing

The Assistant Director of Safeguarding, Student Life and Wellbeing holds overall accountability for the Fitness to Study Policy. They are responsible for strategic oversight, ensuring regulatory compliance, managing institutional risk, and approving policy review and development.

6.4. Learning Support Manager

The Learning Support Manager is responsible for the operational management of this policy. This includes overseeing the Fitness to Study process, chairing or convening the Student Welfare Risk Panel, coordinating risk assessments, and ensuring appropriate support and interventions are implemented and monitored.

6.5. Student Welfare Risk Panel

The Student Welfare Risk Panel is responsible for reviewing cases under Stage 2 of the Fitness to Study procedure. The Panel will assess risk, consider relevant information, and agree appropriate actions or recommendations to support the student or applicant and manage identified risks.

6.6. Academic and Professional Services Staff

Staff have a responsibility to raise concerns where they believe a student's or applicant's health, wellbeing or behaviour may present a risk. Staff should engage with the Fitness to Study process as required, maintain appropriate records, and handle information sensitively and in line with confidentiality and data protection requirements.

6.7. Students and Applicants

Students and applicants are expected to engage appropriately with the Fitness to Study process, participate in discussions, and make reasonable efforts to engage with agreed support or actions. They are also expected to behave in a way that does not place themselves or others at risk.

7. Related Policies and Procedures

This policy should be read in conjunction with the following QA Higher Education policies and procedures, which together support student wellbeing, safeguarding and the effective management of risk:

7.1. Internal QA Higher Education Policies and Procedures

- Respect for All Policy
- QAHE Safeguarding Policy
- Mental Health Support Policy
- Equality and Diversity Policy for QA Higher Education Students
- Reasonable Adjustments Policy
- Disability Policy
- Prevention of Harassment, Sexual Misconduct and Relationship Abuse Policy



7.2. External Legislation and Regulatory Frameworks

- Office for Students (OfS) Conditions of Registration
- Equality Act 2010
- Data Protection legislation, including UK GDPR
- Health and Safety at Work etc. Act 1974
- Human Rights Act 1998
- Mental Health Act 1983

Where there is any overlap between this policy and other QA Higher Education policies or external requirements, QA Higher Education will apply the most appropriate framework based on the individual circumstances of the case.

8. Implementation Procedures

The Fitness to Study Policy will be implemented through a structured, staged process designed to support students and applicants while managing identified risks in a fair, consistent and proportionate manner. The procedure prioritises early identification, engagement and support, with escalation only where necessary.

8.1. Identification of concerns

Concerns (see Appendix a) regarding a student's or applicant's fitness to study may be identified by academic staff, admissions and recruitment teams, professional services staff, student welfare teams, third parties, or through self-disclosure. Where concerns arise, these should be reported promptly to the Learning Support Manager, Student Welfare team or Mental Health team to ensure appropriate consideration and support.

8.2. Initial Assessment and Support

An initial assessment will be undertaken to determine the nature and seriousness of the concern. Where appropriate, informal and supportive interventions will be implemented, including discussion with the individual, signposting to support services, and consideration of reasonable adjustments. A risk assessment will be completed to identify any potential risk to the individual, others, or the wider QA Higher Education community.

8.3. Student Welfare Risk Panel (Stage 2)

Where concerns are ongoing, serious, or have not been resolved through initial support, the matter may be referred to the Student Welfare Risk Panel. The Panel will review available information, including risk assessments and relevant professional input, and will agree appropriate actions or recommendations. The student or applicant will be invited to engage with the process and provide representations wherever possible.

8.4. Formal Review Panel (Stage 3)

Where risks are assessed as high, or where more formal consideration is required, the Student Welfare Risk Panel will also act as the Formal Review Panel. This will normally take place as a



standalone meeting, convened specifically to consider the case in detail. Other relevant teams or specialists may be invited to attend to provide advice or information as appropriate.

The Panel will consider all relevant evidence and determine proportionate outcomes, which may include conditions on study, enhanced monitoring, temporary suspension, or other appropriate actions.

8.5. Decision-Making and Communication

Decisions will be communicated clearly and in writing, setting out the reasons for the decision, any actions required, available support, review arrangements, and any right of appeal in accordance with QA Higher Education procedure.

8.6. Confidentiality and Data Protection

All information relating to Fitness to Study cases will be handled sensitively and in line with data protection legislation. Information will be shared only on a need-to-know basis, except where disclosure is necessary to safeguard the individual or others.

8.7. Monitoring and Review

Actions agreed under this procedure will be monitored by the Learning Support Manager, with oversight from the Assistant Director of Safeguarding, Student Life and Wellbeing. The implementation and effectiveness of this procedure will be reviewed regularly to ensure continued compliance with legal, regulatory and best practice requirements.

9. Monitoring and Compliance

QA Higher Education will monitor the implementation and effectiveness of the Fitness to Study Policy to ensure it is applied consistently, fairly and in line with legal and regulatory requirements.

The Learning Support Manager is responsible for the day-to-day monitoring of cases managed under this policy, including oversight of agreed actions, review points and outcomes. Anonymised data on Fitness to Study cases, themes and outcomes will be collated to support service improvement and risk management.

The Assistant Director of Safeguarding, Student Life and Wellbeing will provide strategic oversight of compliance with this policy, including assurance that appropriate risk management, safeguarding and data protection practices are in place. Regular updates and assurance will be provided to the Executive Board as appropriate.

Failure to comply with this policy may result in action being taken under relevant QA Higher Education procedures. The policy will be reviewed on a regular basis, or sooner where required by changes to legislation, regulation or institutional risk.

10. Equality Impact Assessment

QA Higher Education has undertaken an Equality Impact Assessment of this Fitness to Study Policy in accordance with the Equality Act 2010 and the Public Sector Equality Duty. This assessment demonstrates QA Higher Education's commitment to eliminating discrimination, advancing equality of opportunity, and fostering good relations for individuals with protected characteristics.



This policy supports QA Higher Education's compliance with the Office for Students (OfS) Conditions of Registration, in particular:

- Condition B2, by ensuring that students and applicants are supported to engage effectively with their studies and that appropriate interventions are in place where health, wellbeing or behaviour may present barriers to success; and
- Condition E2, by providing a transparent, fair and proportionate framework for managing risk, safeguarding student wellbeing, and maintaining a safe and supportive learning environment.

QA Higher Education recognises that students and applicants with disabilities, including mental health conditions, may be more likely to be affected by Fitness to Study processes. To mitigate the risk of discrimination, the policy prioritises early identification, supportive intervention, reasonable adjustments and individual assessment. Decisions are informed by risk assessment and professional judgement, rather than assumptions or stereotypes.

The policy is applied consistently across all students and applicants, regardless of protected characteristics, including age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, pregnancy or maternity. All personal and sensitive information is handled in accordance with data protection and confidentiality requirements.

QA Higher Education will monitor the application and outcomes of this policy to identify any disproportionate impact on particular groups and will take appropriate action where required. The policy will be reviewed regularly to ensure continued compliance with the Equality Act 2010, OfS Conditions of Registration and relevant sector best practice.

11. Data Protection

QA Higher Education is committed to handling all personal and sensitive information relating to students and applicants in accordance with data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Personal data processed as part of the Fitness to Study process is collected and used for the purposes of safeguarding, risk assessment, supporting student wellbeing, fulfilling QA Higher Education's duty of care, and meeting legal and regulatory obligations. The lawful basis for processing personal data under UK GDPR includes the performance of a task carried out in the public interest and QA Higher Education's legitimate interests in maintaining a safe and supportive learning environment.

Where special category data is processed, including information relating to physical or mental health, this will be done in accordance with UK GDPR provisions, including where processing is necessary for reasons of substantial public interest, safeguarding, health and social care, or to protect the vital interests of the individual or others.

Personal and sensitive information will be handled sensitively and shared only on a need-to-know basis. Information may be shared without consent where this is necessary to protect the safety of the individual or others, or to comply with safeguarding or legal obligations.

All records relating to Fitness to Study cases will be stored securely, retained only for as long as necessary in line with QA Higher Education's data retention schedules, and disposed of



securely. Students and applicants have the right to access their personal data and to request correction of inaccurate information in accordance with data protection legislation.

12. Further Information

For further information about this policy, clarification on its application, or advice on Fitness to Study matters, please contact the Learning Support team via qahe.learningsupport@qa.com

General enquiries relating to policy oversight or governance may also be directed to the Learning Support Manager or the Assistant Director of Safeguarding, Student Life and Wellbeing through the Student Wellbeing Team.

13. Review

This Fitness to Study Policy will be reviewed on a regular basis to ensure it remains effective, proportionate and compliant with relevant legal and regulatory requirements.

The policy will be reviewed at least every three years, or sooner where required due to changes in legislation, regulatory guidance, institutional risk, or following significant incidents or themes arising from case reviews.

Responsibility for initiating the review sits with the Assistant Director of Safeguarding, Student Life and Wellbeing, with operational input from the Learning Support Manager. Any substantive changes to the policy will be approved through QA Higher Education's governance processes.



14. Appendices

14.1. Appendix A - Examples of Concerns That May Trigger the Fitness to Study Process

This appendix provides non-exhaustive examples of concerns that may lead to consideration under the Fitness to Study Policy. The examples are intended to support understanding and consistent application of the policy. They do not represent automatic triggers for formal action, and each case will be considered on its individual circumstances and level of risk.

Examples of concerns may include, but are not limited to:

- Serious concerns raised by staff, students, external partners or third parties regarding a student's or applicant's health, wellbeing or safety
- Behaviour that poses, or may pose, a risk to the individual or to others
- Significant or sustained distress that is adversely affecting engagement with study or student life
- Behaviour that causes serious or ongoing disruption to the learning or living environment
- Repeated incidents or patterns of behaviour indicating possible underlying health or wellbeing concerns
- Inability or unwillingness to engage with support, advice or agreed interventions where risk has been identified
- Circumstances where reasonable adjustments or informal support measures have been implemented but have not been effective.

The presence of one or more of these concerns does not in itself indicate misconduct or guarantee progression to formal stages of the Fitness to Study procedure. QA Higher Education will prioritise early engagement, supportive intervention and risk-based decision-making in line with the principles set out in the policy.

