

University of South Wales

Student Mental Health Policy

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1. Introduction

- 1.1 It is now widely estimated that one in every four adults will experience some difficulties with their mental health at some stage in their life¹. Like physical health, mental health is something that everybody has. Just as with physical health, a person's mental health can range from good to poor.
- 1.2 Going to University can be an exciting experience but sometimes it can be difficult. Students may experience homesickness, be worried about money, find the pressure of study too much, or be worried about fitting in. At times, these feelings can become overwhelming and impact on people's mental health and wellbeing.
- 1.3 These experiences are very common and usually subside as students begin to settle more into University life. For some, however, these experiences can affect how well students function in any part of life, and can have a direct impact on feeling able to achieve their academic potential.

¹ <http://www.mind.org.uk/information-support/types-of-mental-health-problems/statistics-and-facts-about-mental-health/how-common-are-mental-health-problems/>

1.4 National studies have demonstrated that students are a vulnerable group in terms of mental health difficulties, and therefore it is recognised that appropriate support services, guidelines and policies need to be in place to meet the needs of all students^{2&3}.

2. Aims and Objectives

- 2.1 To formalise a consistent non-discriminatory and supportive approach to mental and emotional wellbeing within the University of South Wales.
- 2.2 To create an accessible framework for working with mental and emotional wellbeing needs within the University of South Wales.
- 2.3 To identify roles and responsibilities within the University of South Wales in meeting the needs identified for students with mental and emotional wellbeing issues.
- 2.4 To provide signposting to appropriate practical guidance for staff and students on mental health and wellbeing.
- 2.5 This policy supplements all other University policies and appropriate links are given throughout. Where a student's mental health may be seen as a contributory factor in connection with matters addressed under any other University procedure, additional guidance is provided by this policy.

N.B. this policy is offered in addition to the provision of staff awareness training which is available from the Mental Wellbeing Advisers. Should you wish to arrange for staff training, please contact:

Lynne Fisher, Senior Mental Wellbeing Adviser

Tel: 01443 482080

Email: MWS@southwales.ac.uk

3. Context and legal framework

3.1 This policy is set within the context of legislation and good practice guidance which outline definitions and terminologies, duty of care, liability of negligence, and implications on roles and responsibilities.

- [Equality Act 2010 and UN Convention on Disability Rights](#)⁴
- [Special Educational Needs and Disability Act \(2001\)](#)⁵
- [Data Protection Act \(1998\)](#)⁶

² Royal College of Psychiatrists, [Mental Health of Students in Higher Education](#), September 2011

³ Universities UK [Student Mental Wellbeing in Higher Education: Good Practice Guide](#), February 2015

⁴ <https://www.direct.gov.uk/en/DisabledPeople/RightsAndObligations/index.htm>

⁵ http://www.opsi.gov.uk/acts/acts2001/ukpga_20010010_en_1

⁶ http://www.opsi.gov.uk/Acts/Acts1998/ukpga_19980029_en_1

- [UMHAN \(2010\)](#) Practical Guidance for the *Development and Day to Day Provision of a Higher Education Institution Mental Health Service*⁷
- Royal College of Psychiatrists, [Mental Health of Students in Higher Education](#), September 2011⁸
- Universities UK [Student Mental Wellbeing in Higher Education: Good Practice Guide](#), February 2015⁹

4. Definitions and terminology

4.1 The University of South Wales has an obligation to exercise a level of care towards an individual, as reasonable in all the circumstances, to avoid injury to the person. This includes employees of the University of South Wales, current students, potential students and visitors. This obligation is called a '**Duty of care**'. At times it is recognised that there will be conflicts in the University of South Wales's obligation to provide duty of care e.g. when behaviour caused by mental distress causes concern for other students or staff members. Where these issues affect members of staff, they should be discussed with a direct line manager or the Director of Student Services. For further information on this including liability of negligence please refer to

www.amosshe.org.uk

4.2 '**Disability**' is defined as a mental or physical impairment which has an adverse effect on a person's ability to carry out normal day-to-day activities, where the adverse effect is substantial and long-term (meaning it has lasted for 12 months, or is likely to last for more than 12 months or for the rest of their life) (see Disability Discrimination Act 1995 and the Equality Act 2010)

4.3 The University of South Wales has specific legal responsibilities towards students whose mental health and wellbeing falls within the definition of disability under the Disability Discrimination legislation. The legislation outlines areas of **discrimination** which are unlawful including:

- "**Direct discrimination**" - where the student is treated less favourably on grounds of their disability. Direct discrimination includes "associative discrimination," which *might* occur to a student who does not have a recognised disability but ***cares for someone with such a disability***.
- "**Indirect discrimination**" - indirect discrimination occurs when a policy or action which applies in the same way for all students has an effect which particularly disadvantages students with a disability (unless the person applying the policy can justify it). Indirect discrimination can also occur when a policy would put a student at a

⁷ <https://www.umhan.com/resources/10-practical-service-guidance-development-and-provision-of-a-service>

⁸ https://www.rcpsych.ac.uk/docs/default-source/improving-care/better-mh-policy/college-reports/college-report-cr166.pdf?sfvrsn=d5fa2c24_2

⁹ <http://www.universitiesuk.ac.uk/highereducation/Pages/StudentMentalWellbeingGuide.aspx#.Vtl5yU1WIdV>

disadvantage if it were applied. This means, for example, that where a person is deterred from doing something, such as applying for a course, because a policy which would be applied would result in his or her disadvantage, this may also be indirect discrimination.

- **“Disability related discrimination”** - where a student is treated less favourably for a reason related to their disability e.g. because of the consequences of their disability rather than the disability per se.
- **Failure to make reasonable adjustments** - where such adjustments may ameliorate the effect of the disability on the ability to participate.
- **Victimisation** - where unfavourable action is taken in consequence of an allegation that a student has been discriminated against.

5. What is ‘Mental health and emotional wellbeing’?

5.1 “Mental health is the emotional resilience which enables us to enjoy life and survive pain, disappointment and sadness. It is a positive sense of well-being and an underlying belief in our own and others’ ‘dignity and worth”

(H.D.A., formerly H.E.A.)

5.2 For the purposes of this policy, the term ‘mental health difficulties’ refers to:

- long term mental illnesses or psychiatric conditions - which may be classified as a disability under the DDA⁹.
- emerging mental health problems which may develop into conditions which require ongoing support or intervention
- temporary debilitating mental health conditions or reactions which impact on a student’s ability to fulfil their academic potential.

5.3 There is a range of conditions which come under the umbrella term ‘mental health difficulties’, including anxiety, depression, eating disorders, bipolar disorder, schizophrenia, obsessive compulsive disorder, and many more, as diagnosed by a relevant medical practitioner.

N.B Please visit the self-help section of the [Wellbeing website](#) which gives straightforward practical information on a range of mental health issues and contain resource lists for seeking further help.

6. Roles and Responsibilities

6.1 The role and responsibilities of the Institution

6.11 Having regard for the Equality Act 2010 the University of South Wales aims to provide the widest possible access to those who wish to

⁹ The DDA defines a disability as a “physical or mental impairment which has a substantial and long-term adverse effect on [a person’s] ability to carry out normal day-to-day activities”.

benefit from its educational activities and to remove any barriers which already exist to students with identified mental health issues, bearing in mind the constraints imposed by the campus and certain University buildings.

- 6.12 Once accepted on to one of its schemes, the University will aim to ensure that students with identified mental health issues are provided with the resources and facilities necessary to take a full part in the educational and social life of the campus as far as possible comparable to that of non-disabled students.
- 6.13 The University of South Wales will endeavour to ensure that its policies and provision in relation to disability exemplify the best possible practice and that it continues to develop and improve what is available.
- 6.14 The University of South Wales encourages students to disclose their needs at the earliest opportunity, both pre-and post-entry and to engage with appropriate services. The reason for requesting such information is to ensure the appropriate information, assessment and support is made available to the student. Without disclosure, there can be no offer of specific support. Therefore, students should be made aware in writing of the importance of disclosing a disability (whether their own or that of someone for whom they care, if their caring responsibilities are likely to impact upon their study) at the application stage, and a written statement to this effect should appear in all relevant literature, on the student intranet, University website etc.
- 6.15 When a disclosure is made, the University of South Wales will offer support services to students with mental health difficulties. For examples of support available please see information on [Student Services](#)¹⁰, [Chaplaincy](#)¹¹, and the [Advice Zone](#)¹². Liaison with services in the local community is also a responsibility and this includes the Community Mental Health Teams. It is not, however, the responsibility of the University of South Wales to replicate services that already exist in the community.
- 6.16 The University of South Wales has a responsibility to provide information on the nature and parameters of the support offered, and by whom the support is offered, through appropriate literature and contact with staff.
- 6.17 The University of South Wales has a responsibility to make clear the roles and responsibilities of staff engaged in contact work with students with mental health difficulties in the context of the duty of care that is owed to students and the staff themselves. This includes making explicit the boundaries of personal and professional involvement to avoid both staff themselves and students being at risk through inappropriate referral or action.
- 6.18 Training, staff development and support in relation to mental and emotional wellbeing is offered through the Mental Wellbeing Advisers to all relevant staff to enable them to undertake their roles and

¹⁰ <https://advice.southwales.ac.uk/a2z/student-services/>

¹¹ <https://chaplaincy.southwales.ac.uk/>

¹² <https://advice.southwales.ac.uk/>

responsibilities in providing support to students with mental health difficulties efficiently and effectively. The Wellbeing Service have produced guidelines for staff on 'What to do with a Student of Concern regarding Mental Health'¹³. In addition to bespoke mental health awareness training, Wellbeing staff also offer the internationally recognised workshops [Mental Health First Aid and Applied Suicide Intervention Skills Training](#)¹⁴.

For information on support services for students offered by the Counselling and Mental Wellbeing Services please visit the [Wellbeing student website](#).

6.2 The roles and responsibilities of staff

6.21 Students with mental health difficulties should be responded to in a non-stigmatising, well informed and empowering manner.

6.22 All staff should take the opportunities provided through training, written information, and discussion to be informed lay people regarding mental health.

Staff should be clear about their duty of care responsibilities in relation to mental health difficulties. Staff should be familiar with the section on duty of care in this guide. Any areas of concern should be discussed with the Duty Officer from the Wellbeing Service, your line manager, Head of Department/Faculty or the Director of Student Services.

Details on how to contact the Duty Officer can be found on the [Wellbeing Service](#)¹⁵ pages of the Staff Intranet.

6.23 When developing or reviewing departmental procedures and policies the needs of students with mental health difficulties (and of students caring for those with mental health difficulties) should be considered. Publications should encourage students to declare their support needs at the earliest opportunity.

6.24 Staff should be as informed as soon as possible, and opportunities of supporting students taken wherever possible. However it is crucial that everybody recognise their own personal and professional limitations when offering support. Part of being informed and responsive is about knowing when and where to refer on. Specialist help or advice should be sought as appropriate. If in doubt, contact a Mental Health Adviser, Student Counsellor, Health Centre Nursing Staff or Director of Student Services. Knowing when and to whom to refer may help avoid those cases where a student becomes overly dependent on a member of staff to the point where the staff member is forced into acting in a rejecting manner. Appropriate training in Mental Health Awareness and the Role of the Mental Wellbeing Adviser should be made available as part of Disability induction training. The Wellbeing Service also provides

¹³ https://universityofsouthwales.sharepoint.com/sites/Student_Services/SitePages/en-GB/wellbeing.aspx

¹⁴ <https://www.prevent-suicide.org.uk/training-courses/asist-applied-suicide-interventions-skills-training/>

¹⁵ https://universityofsouthwales.sharepoint.com/sites/Student_Services/SitePages/en-GB/wellbeing.aspx

Mental Health First Aid and Applied Suicide Intervention Skills Training.

- 6.25 The University's Student Services department offers a range of services, offering information, advice and support to students.
- 6.26 Whenever staff are concerned about a student's mental health and action is taken, all decisions and actions taken should be recorded. Ensure that when recording any personal information that it is done in line with the University of South Wales's policy on Data Protection¹⁶.

6.3 The roles and responsibilities of the student

- 6.31 Students are encouraged to disclose any disability (including mental health difficulties – whether their own or those of someone for whom they have caring responsibilities) to the University of South Wales at the earliest opportunity to help us to make the reasonable adjustments to meet their needs and to enhance their learning experience. This information will be dealt with in accordance with the [Student Services Confidentiality Code](#)¹⁷.
- 6.32 Students are encouraged to take an active role in, and responsibility for communicating their needs and seeking support within the University of South Wales at the earliest opportunity.
- 6.33 Students will be encouraged to take care of their own mental health and to seek help and support early when they start to feel mentally vulnerable.
- 6.34 Students should be helped to be aware of when their behaviour, arising out of their mental health difficulty, impacts negatively on those fellow students and staff with whom they are in contact. This may be encouraged through liaison with the Mental Health Adviser.
- 6.35 Students with mental health difficulties need to consider how, if they refuse to accept a recommended treatment, this may impact both on their own well-being and that of those with whom they are in contact.
- 6.36 If a student does not want any information shared within the University of South Wales or wider, the support which can be provided may be restricted and subsequently have an effect on academic achievement. However, the request will be respected within the application of the confidentiality code and the student will be advised of the implications.
- 6.37 Students supporting fellow students should know what their personal limitations are, and when and where to refer to for further help. Staff who become aware of such students should refer them to

¹⁶<https://uso.southwales.ac.uk/information-compliance-unit/data-protection/>

¹⁷<https://advice.southwales.ac.uk/a2z/student-services-confidentiality-code/>

the Wellbeing service. Details on how to contact the Wellbeing Service can be found on the staff intranet¹⁸.

6.38 All students have their own part to play in working towards a non-stigmatising community.

7. Identification of and Support for Students with a disclosed mental health issue: Pre-admission and selection

7.1 It is the intention of the University of South Wales to ensure that applications received declaring mental health issues are processed in line with the [Strategic Equality Plan](#)¹⁹ and academic suitability. The likely interaction between impairment or illness and previous academic performance or intended course of study is borne in mind when considering applications. To this end it is essential that all those responsible for admissions be satisfied that the requirements for reasonable adjustments can be met.

7.2 We encourage prospective students to visit us before making an application in order to get some impression of whether this will be a suitable place to study.

7.3 Within the constraints of our campus locations and the possible need for inter site travel (for which assistance is available in appropriate cases), the University of South Wales will aim to ensure that, once accepted on to one of our schemes, students will be provided with the resources and facilities to take a full part in the educational and social life of the campus as far as possible comparable to that of non-disabled students.

7.4 Prior to enrolment; great care should be taken to encourage applicants to provide us with all the necessary information, to enable University of South Wales to provide appropriate support during their studies.

7.5 Assistance is given to students to apply for [Disabled Students Allowances \(DSAs\)](#)²⁰ and other kinds of financial support. The University of South Wales believes that the provision demonstrates best possible practice.

7.6 Once a prospective student has applied to the University of South Wales, and has declared on the application form that they have a specific need arising from an impairment or medical condition, and are considered to be suited academically for the chosen area of study, they will be contacted personally by a Disability or Mental Wellbeing Adviser, and invited to discuss requirements in greater depth. Often this can be done by letter or telephone, but in some cases applicants will be invited / recommended to attend the University to do this in more detail, including meeting with members of the faculty.

¹⁸ https://universityofsouthwales.sharepoint.com/sites/Student_Services/SitePages/en-GB/wellbeing.aspx

¹⁹ download a copy of the university's Strategic Equality Plan: <https://hr.southwales.ac.uk/equality-diversity-and-inclusion/strategic-equality-plan/>

²⁰ Funding for students with disabilities: <https://disability.southwales.ac.uk/disabled-students-allowances/>

- 7.7 The purpose of this meeting is to enable the prospective student to assess whether the University of South Wales is able to meet all of their needs; it is also intended to help them decide whether or not to accept a place at the University if offered. The University of South Wales will assist with the costs of such attendance if that is necessary.
- 7.8 If we are unfortunately unable to offer a place on a course, then the application is referred to a designated member of the Directorate in order to ensure that the declaration that they have a specific need arising from impairment or medical condition has not influenced this decision. The University seeks to ensure that all applications are dealt with in accordance with our Strategic Equality Plan, the Disability Discrimination Act (1995), Equality Act (2010) and, in compliance with the requirements of the Data Protection Act 1998; all information is treated as confidential.
- 7.9 In addition to providing an opportunity to consider accommodation and other support arrangements, one of the important areas considered in this advisory meeting addresses any specific arrangements that will need to be made for teaching, assessment and examinations. This will lead, where appropriate, to an Individual Support Plan.
- 7.10 These arrangements take into account the best practices learned from active involvement with local and national groups such as UMHAN, MIND, and Mental Health Foundation, members of whom contribute regularly to staff development programmes for teaching and support staff and for student support workers. This enables the service to maintain a comprehensive network of non medical helper support as well as assisting students to select and employ their own non-medical helpers if they need them.
- 7.11 We monitor and evaluate our support services internally through our annual monitoring of academic programmes, through the Equality & Diversity Committee which meets regularly and includes student representatives. In addition, our provisions are reviewed externally through Funding Council Quality Assessment procedures. All external reports to date have been complimentary of the University's provision for disabled students.

8. Identification of and Support for Students with a disclosed mental health issue: Admission and Induction

- 8.1 The University of South Wales acknowledges that it is important that specific requirements due to disability, including mental health, are identified as early as possible, so that necessary arrangements may be made to facilitate an inclusive environment. Students are asked to give their written consent to the sharing of confidential information with relevant University staff. Early identification is arranged in the following ways:
- i. At application, students self-identify through the UCAS and University application forms.
 - ii. On acceptance of an offer of a place on a scheme at the University, students requiring assistance with accommodation return a form to

- [Accommodation Services](#)²¹ which includes information relating to specific residential requirements.
- iii. On presentation at the Health Centre, students are asked to complete a medical registration card, which includes information concerning illness, and other specific needs. This information is held in confidence by the Health Centre Staff at the Health Centre. Treatment procedures and any other specific requirements will be discussed on registration.
 - iv. Students who are resident in University Halls of Residence are required to complete registration cards for accommodation staff on which they are invited to provide information concerning disability or any other specific needs;
 - v. Students joining the Sports and Recreation Membership Scheme are required to complete an application form on which they are invited to provide information concerning impairment or chronic illness.
 - vi. Direct contact with a Disability Adviser and Faculty Disability Co-ordinator.

Information obtained in (ii), (iii), (iv), (v), (vi) and (vii) above is treated in the strictest confidence by the person receiving it. In appropriate cases, the student will be offered an interview, and may be recommended to inform other appropriate officers of the nature of the necessary reasonable adjustments.

9. Identification of and Support for Students with a disclosed mental health issue: post entry

- 9.1 Many students will not have declared any mental health needs at application or prior to entry. Particularly because of the continuing problems over stigma and mental health in society, this is very commonly the case.
- 9.2 The first time that a possible mental health difficulty or history of previous mental ill-health is identified is often in a chance conversation after entry or in the wake of a particular 'crisis' or time of stress (e.g. at examination time). There are also often cases when fellow students detect a problem, which they bring to the attention of other members of the University community.
- 9.3 In all such cases a protocol needs to be followed by any staff member who becomes aware of any difficulties (see [What to do with a Student of Concern regarding Mental Health -Guidelines for staff](#)).²²
- 9.4 Should a student feel that they could benefit from specialist support, contact should be made with the Advice Zone or a Request for Support via the [Wellbeing Website](#).

²¹ <http://accommodation.southwales.ac.uk/>

²² https://universityofsouthwales.sharepoint.com/sites/Student_Services/SitePages/en-GB/wellbeing.aspx

- 9.5 Details on services available to meet the needs of students with mental health and wellbeing issues are available to view on the [Wellbeing website](#).²³
- 9.6 The [Disability Service](#)²⁴ web-pages detail available support.

10. Confidentiality and Disclosure

- 10.1. It is important that students with mental health difficulties (whether their own or those of anyone for whom they have caring responsibilities) can feel assured that any information they provide will be treated as confidential and that it will not harm their academic standing. Doctors, nurses, counsellors and chaplains are all required to observe confidentiality in accordance with their professional codes and as with the Disability or Mental Health Advisers, within the limits of the Student Services Confidentiality Code.
- 10.2. The University has a clear and transparent mechanism for communicating information to those who need to know about a student's disability, based upon obtaining the student's written consent to disclosure. Some students, however, will choose to withhold their consent and it is always important to respect a student's right to confidentiality. However, confidentiality can become an issue if staff or students have real concerns about a student's well-being. Student Services has a Code of Practice on Confidentiality which provides guidance on what action to take in circumstances where the commitment to confidentiality should be extended.²⁵
- 10.3. Those students who know themselves to be vulnerable to having mental health difficulties should seriously consider making this known as it then increases the chances of the University being able to respond appropriately and with understanding. The consequences of not disclosing may well result in insufficient support and possibly inappropriate responses.
- 10.4. All personal data kept must be recorded and stored in line with the University of South Wales's Data Protection Policy.²⁶

11. Complaints and disciplinary issues

- 11.1. All students are subject to rules and disciplinary procedures and hence this includes students with mental health difficulties. The University of South Wales acknowledges that there is a danger that disciplinary procedures may be used inappropriately to deal with students whose behaviour may not fit the 'norm', or where constant re-

²³ Support available <https://wellbeing.southwales.ac.uk/>

²⁴ <https://disability.southwales.ac.uk/>

²⁵ Student Services Confidentiality Code: <https://advice.southwales.ac.uk/a2z/student-services-confidentiality-code/>

²⁶ For further advice on this please liaise with the University's Data Protection Officer. Further information at: <https://uso.southwales.ac.uk/information-compliance-unit/data-protection/>

offending is due to obvious mental ill-health. In such circumstances consideration of support needs will first be needed before further action and an alternative to the normal disciplinary route may be necessary. Please see [Intervention Policy for Students Causing Significant Concern \(fitness to study\)](#)²⁷.

- 11.2. The institution will have a responsibility to deal with such students to ensure that they do not qualify to practise in a profession when they are deemed not fit to do so. For information on the University of South Wales' [Policy and Procedure Governing Fitness to Practise](#).²⁸
- 11.3. The University of South Wales seeks to resolve as quickly and fairly as possible any complaint a student may have, as an individual, about services provided by the University or treatment by any staff member, student or visitor.
- 11.4. The purpose of the complaints procedure is to provide an opportunity for such students to resolve the problems or concerns they have. Where concerns relate to academic programmes, students should raise them through these procedures so that they can be resolved before the assessment stage.
- 11.5. Allegations of harassment by a student or member of staff fall under Dignity at Work Policy. Students believing they are being harassed in any way should first seek the advice of [a Dignity At Work Adviser](#).²⁹ The Students' Union or Student Services can also help.

12. Monitoring and Reviewing

- 12.1 The Equality and Diversity Committee Structure reports to Directorate and is responsible for monitoring the implementation of this Policy.
- 12.2 The Faculty Quality Assurance Committee (FQAC) ensures that the faculty considers and reports on their provision for student welfare as part of the annual course monitoring process.
- 12.3 The policy will be reviewed on an annual basis to aim to maintain accuracy.

²⁷ <https://registry.southwales.ac.uk/student-regulations/fitness-study/>

²⁸ <https://registry.southwales.ac.uk/student-regulations/fitness-practice/>

²⁹ <https://advice.southwales.ac.uk/a2z/bullying-and-harassment/>

Appendix 1

Useful Links

Academic Policies and regulations

<https://academicregistry.southwales.ac.uk/>

Counselling

<https://counselling.southwales.ac.uk/>

Dignity at Study Policy

<https://advice.southwales.ac.uk/a2z/bullying-and-harassment/>

Disability and Dyslexia Service

<https://disability.southwales.ac.uk/>

Fitness to Practice Policy

<https://registry.southwales.ac.uk/student-regulations/fitness-practice/>

Fitness to Study Policy

<https://registry.southwales.ac.uk/student-regulations/fitness-study/>

What to do with a Student of Concern regarding Mental Health - Guidelines for staff

https://universityofsouthwales.sharepoint.com/sites/Student_Services/SitePages/en-GB/wellbeing.aspx

Health Centre

<https://health.southwales.ac.uk/>

Legal

Disability Discrimination Act, Equality Act etc

<http://www.equalityhumanrights.com/>

Mental health

<https://mentalhealth.southwales.ac.uk/>

Wellbeing Service

<https://wellbeing.southwales.ac.uk/>

Urgent Help

<https://wellbeing.southwales.ac.uk/urgent-help/>

Protocol for Responding to the Death of a Student – this is covered in the Contingency Management Plan Document (USO)

Protocol for Responding to Reports of Missing Students – this is covered in the Contingency Management Plan Document (USO)

Student Complaints Procedure

<https://registry.southwales.ac.uk/student-regulations/student-complaints/>

Student Services

<https://advice.southwales.ac.uk/a2z/student-services/>

University Policies

<https://www.southwales.ac.uk/about/our-organisation/governance-and-leadership/policies/>