

2019-20

Annual Report

Office of Student Conduct, Complaints &
Appeals (OSCCA)

Introduction and thanks

The academical year 2020-21 has continued to see a further increase in case load across almost all procedures, in addition to seeing revisions to several procedures to ensure that our processes are in line with best practice across the sector.

This report provides a summary of case figures from the last three years, including equality and diversity data, it provides case studies and outlines ongoing challenges, and outcomes from the external Ombud, the OIA. There has been an 18% rise in submitted cases across all procedures. In relation to student complaints, this rise was in part a result of the impact of industrial action and COVID-19 but elsewhere this is just part of a growing trend of students becoming more confident in using procedures and reporting other students' behaviour. Challenging OSCCA staff to develop processes that are more efficient that maintain a personalised approach to students and staff (which is more likely to lead to a positive outcome for all those involved).

One advantage of increasing cases is the ability to provide some tentative analysis around equality and diversity data, including student racial identity. Generally, students from Black, Asian and Minority Ethnic background are more likely to raise complaints about their student experience or request reviews of application outcomes, but a lot less likely to complain about other students' behaviour. The proportion of students using procedures is very low; less than 1% of the student population, nonetheless, the figures relating to equality and diversity data tend to be reasonably proportionate to student groups in most categories, but this is not the case for students of BAME backgrounds.

The outcomes of cases handled by OSCCA are determined by a range of decision-makers; mostly academic staff, who volunteer their time whilst undertaking a variety of senior College and University posts, research and teaching duties. None of the work outlined in this report would be possible without these staff who receive no tangible recompense but who are undertaking these critical roles within strict timeframes. OSCCA is exceptionally grateful for their time, effort and skills.

Similarly, thanks is given to the Student Advice Service and College Senior Tutors and Tutors who provide unending support to students who are using student procedures or are subject to student procedures. We are able to witness the benefits when students take advantage of the support on offer and therefore, understand the significant impact this has for the students.

OSCCA is also grateful to work closely with other central University teams in relation to policy and student cases, and their enthusiasm to work with us to improve our processes, particularly: Student Registry, Human Resources, Equality and Diversity and the Education and Quality Policy Office.

OSCCA continues to provide informal guidance to staff and students on the University's student conduct, complaints and appeals procedures. This includes emails, telephone calls and bespoke briefings to Colleges and Departments/Faculties.

This report enables monitoring but also improves transparency and it is anticipated that this report will be made publicly available. The data provided within this report would be releasable in any case under a Freedom of Information request.

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Casework

This part of the report details the cases that have been received and handled by OSCCA within the last three years. Equality data is included where it has been recorded and where there are sufficient numbers of cases for it to be meaningful. Trends and case studies are provided alongside the statistics of each procedure, which gives an insight into the challenges that students and the University are experiencing.

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The year in numbers

246 cases handled by OSCCA (18% rise)

88 complaint and misconduct investigations handled by OSCCA staff

42 upheld complaint and appeal outcomes for students

48 reports of student misconduct

3.7 FTE OSCCA members

38 academic decision-makers considering complaints and appeals

68 FOI requests made and received responses relating to OSCCA work (200% increase on 2018-19)

7 meetings arranged to support Inter-Collegiate groups: Deans of Discipline; and College Discrimination and Harassment Contacts

Challenges

Recruiting decision-makers

There has been some success with encouraging more decision-makers to come forward, but the significant increase in cases has resulted in this additional capacity still being unsustainable at the current level. In the current climate, where many academics are already stretched, the fact that these roles are critical to the work of the University and the decisions impactful to individual students is insufficient encouragement to take on this additional voluntary role. Academic decision-making is one of the core principles of the complaint and appeal processes but can only continue with the good will of academics and allowances from Departments/Faculties and Colleges for those who undertake this work.

Recording anonymous student complaints

During 2019-20, OSCCA piloted an anonymous reporting process for Graduate students. While warmly welcomed by Graduate Tutors and student representatives, it was poorly used and those students who attempted to use it were often attempting to report issues that were unable to be resolved through an anonymous system because the issue itself was serious and it could not be discussed with the staff member without identifying the student reporting the matter.

In April 2021, the University will be rolling out a new reporting mechanism for students and staff called 'Report and Support'. This will include options for named and anonymous reporting and it is hoped that the single mechanism will significantly improve knowledge of how to report and the simplicity of reporting, while retaining the robust framework of formal procedures for investigating reported matters.

The revised anonymous option will allow students (and staff) to provide an anonymous account of what has taken place, and provide the University with the option to take informal action in response to the account. As with all anonymous systems, there are limits on the type of information that can be received and acted upon through this system; this will be explained to users and ultimately the University will have the option to redact identifying information from anonymous reports.

The COVID-19 safety net and plagiarism

Significant and fast-paced changes were made to assessment as a direct impact of COVID-19. One of the unforeseen impacts of the safety net (where final year students would not receive a lower degree class than had been obtained in the previous year) was on plagiarism. The changes saw an increase in timed open book assessments where some students were told that referencing was unimportant. This led to an increase in plagiarism cases (and a decrease in examination misconduct). Due to the safety net, there were some instances where examiners could not take sufficient action in relation to minor plagiarism, as the class of degree would not have been affected by the reduction in marks, resulting in referral to the Student Discipline Procedure.

Consequently, revisions will be recommended for the powers of examiners and the Student Discipline Officer to ensure that minor plagiarism is handled proportionately. In the meantime, it is critical that Departments/Faculties continue to provide clear guidance on what constitutes plagiarism, particularly in open book examinations.

Policy and procedure work

Procedure to support and assess capability to study (fitness to study)

In the Easter Term 2020, the Council and the General Board published a Report proposing revisions to the fitness to study procedure, this was approved and came into effect on 1 October 2020. Changes included, as a result of student feedback, a change of title to the Procedure to Support and Assess Capability to Study, as well as a move from a one-stage to a two-staged procedure. Starting with a first meeting, at departmental level, to ensure that students are aware of the concerns and have access to a supportive action plan before reaching a University Panel to consider whether the student is capable of currently studying.

The additional first stage has the benefit of providing centralised and consistent guidance to departmental staff who are often attempting to challenge complex behaviour, which is often significantly impacting upon other students and staff.

The revised procedure also enables Colleges to refer more easily into the second stage of this procedure, where the College considers the University is in a better position to facilitate the formal panel to assess whether the student is capable of continuing to study (the equivalent of a stage 3 panel within a typical College Fitness to Study Procedure. A revised template for College Fitness to Study Procedures, based on the University's revisions, will be available in due course.

Fitness to Practise Procedure

In the Easter Term 2020, the Council and the General Board published a Report proposing revisions to the Procedures to Determine Fitness to Practise for Preclinical and Clinical Medical Students and Veterinary Students. The changes combined the previously separate procedures and also incorporated the PGCE students and came into effect on 1 September 2020.

The revisions incorporated the OIA's (the external ombudsman) guidance on fitness to practise, published in Michaelmas Term 2019.

The Informal Complaint Procedure for Student Misconduct

In the Easter Term 2020, the Council on the recommendation of the General Board approved changes to the Procedure for Student Harassment and Sexual Misconduct, now titled the Informal Complaint Procedure for Student Misconduct. The changes included mirroring the definitions of misconduct used within revised Student Discipline Procedure ('physical misconduct', 'sexual misconduct' and 'abusive behaviour'); as well as removing the separate Code of Behaviour and explanatory notes. In addition, the language was updated to make it more accessible and accurate.

The revised procedure came into effect on 1 October 2020. A revised College template based on the changes was made available several weeks after this.

Student Complaint Procedure - statistics

This procedure covers any action or inaction of the University not covered by any other procedure, including relating to a course of study, facilities, services, or individual staff members. Decision-makers consider whether the University's written policies and procedures have been followed, whether actions taken by the University were reasonable and whether the student has been substantively disadvantaged.

Figure 1 – Student Complaint case figures and equality and diversity data

Year	Group	Formal complaint stage			Review stage	
		received	investigated	Part upheld/upheld	requests	upheld
2019-2020	Total	71	50	20	11	2
		COVID/strike action 36 staff misconduct 16	COVID/strike action 27 staff misconduct 11 (inc.7 HR investigations)	COVID/strike action 15 staff misconduct 4		
		quality of a service 4 quality of a decision 7 quality of information 1 supervision/course 7	quality of a service 4 quality of a decision 3 quality of information 1 supervision/course 4	quality of a service 1		
	Student	UG: 21 PG/Grad: 50	UG: 16 PG/Grad: 34	UG: 2 PG/Grad: 18		
	Gender	Female: 42 Male: 29	Female: 32 Male: 18	Female: 13 Male: 7		
	Racial identity/ Fee status	White students: 35 (22 home, 6 EU, 7 overseas) BAME students: 33 (11 home, 22 overseas) Info refused: 3	White students: 24 (14 home, 4 EU, 6 overseas) BAME students: 23 (6 home, 17 overseas) Info refused: 3	White students: 11 (7 home, 1 EU, 3 overseas) BAME students: 9 (3 home, 6 overseas)		
	Recorded disability	Disability: 21 No known disability: 50	Disability: 16 No known disability: 34	Disability: 7 No known Disability: 13		
	Total	41	24	6	5	0
	Student	UG: 12 PG/Grad: 29	UG: 10 PG/Grad: 14	UG: 3 PG/Grad: 3		
2018-2019	Gender	Female: 25 Male: 16	Female: 15 Male: 9	Female: 3 Male: 3		
	Racial identity/ Fee status	White students: 25 (15 home, 6 EU, 4 overseas) BAME students: 16 (6 home, 1 EU, 9 overseas)	White students: 16 (10 home, 3 EU, 3 Overseas) BAME students: 8 (1 Home, 1 EU, 6 Overseas)	White students: 4 (2 home, 1 EU, 1 Overseas) BAME students: 2 (1 home, 1 overseas)		
	Recorded disability	Disability: 5 No known disability: 39	Disability: 3 No known disability: 21	Disability: 1 No known Disability: 5		
	Total	40	19	4	1	0
2017-2018	Student	UG: 11 PG/Grad: 29	UG: 9 PG/Grad: 13	UG: 2 PG/Grad: 2		
	Gender	Female: 26 Male: 14	Female: 13 Male: 6	Female: 3 Male: 1		
	Racial identity/ Fee status	White students: 17 (11 home, 3 EU, 3 overseas) BAME students: 23 (4 home, 3 EU, 16 overseas)	White students: 8 (5 home, 1 EU, 3 Overseas) BAME students: 10 (2 home, 8 overseas)	White students: 1 (1 overseas) BAME students: 3 (2 home, 1 overseas)		
	Recorded disability	Disability: 10 No known disability: 30	Disability: 5 No known disability: 14	Disability: 0 No known Disability: 4		
	Total	40	19	4	1	0

Grouping all 'non-white' students into a single 'BAME' category is not ideal, but necessary to avoid the potential identification of individuals. Within the group of 33 BAME students who raised complaints, 10 different ethnicities were recorded, including Black and Asian (South and East) students from both the UK and overseas.

Student Complaint Procedure – analysis of statistics

Complaints relating to the impact of COVID-19 and/or industrial action

Similarly to when industrial action took place in 2018 (where the University received 8 complaints), a single deadline of 27 July 2020 and a streamlined form was advertised to all students at the end of the Easter Term. 31 students raised complaints by this deadline, significantly impacting the complaint figures for this year and doubling the number of complaint investigations that were required during this year.

Two thirds of this group of complaints that were investigated were from graduate or postgraduate students. A number of these were upheld, either because their terms and conditions had promised the course as advertised, which included practical elements; or because a significant amount of teaching had been missed as a result of industrial action and not sufficiently supplemented. The terms and conditions for Graduate students have been amended to bring them into line with undergraduate students, where courses can be amended where circumstances are beyond the University's control. Conversely, none of the undergraduate complaints investigated found that any undergraduate student had been unduly disadvantaged by any changes to courses.

Complaints between the 31 students requested a total amount of just over £115,000 in compensation. Following investigation, £8,971 has been paid out to 16 of the students. 6 of the 31 students requested reviews of the initial decisions and have been issued with Completion of Procedures letters and have 12 months to raise a complaint with the external ombudsman, the OIA.

A number of Complaint Officers kindly provided additional help to determine these cases in a short space of time over the summer vacation and the beginning of Michaelmas Term and this was gratefully received. While there was some delay beyond normal timeframes to provide Departments/Faculties extra time to respond and to enable case handlers to process the significant numbers of complaints at the same time, the majority of complaints were completed within 70-90 days and all students were kept up-to-date throughout this time.

Complaints regarding staff misconduct

Individual staff misconduct was the most complained about issue after COVID-19/industrial action complaints. It is relevant to note that this type of complaint can span from an inappropriate comment within an email or lecture, to serious sexual misconduct. 7 of the complaints required an investigation to be taken forward in accordance with HR procedures and students agreed to amendments to the procedure in each case to enable this type of investigation to take place. Where staff misconduct is alleged, there is always consideration for the support that a student may require and action to minimise any interaction between the student and staff member, regardless of the outcome.

While proportionally this may seem like a significant number of complaints, it is in line with our objective to receive higher levels of reporting of misconduct and it indicates that at least a proportion of students have confidence that our systems will be fair and not 'protect' staff who have misbehaved. From time to time students still reference the Vice-Chancellor's statement relating to 'Breaking the Silence'.

Equality and Diversity data

Summary data for all University students is available [here](#) with general admissions data on ethnicity available [here](#). Further breakdown of ethnicity is published within the [Race Equality Charter Mark application](#), although the data pre-dates this academic year. Graduate and postgraduate students are consistently the majority of complainants, noting that Colleges are likely to play a more significant role for undergraduates in resolving complaints, as well as being responsible for a more significant part of the undergraduate student experience.

Particular groups of students who are over represented in these figures:

- Female students, not in relation to COVID-19 and/or industrial action complaints but in every other category. This is not in line with national statistics.
- Disabled students, who raised complaints both linked to their disability and reasonable adjustments and in relation to other areas of their experience. This is in line with national statistics.
- BAME students, both home and overseas. This group of students make up the majority of complaints relating to staff misconduct, though only a minority of complaints explicitly state that the behaviour was linked to racism. Statistics about this group of students are not reported nationally.

For all groups of students there was no significant difference in the number of complaints being investigated or upheld. This suggests that none of these groups of students are more likely to raise unreasonable or illegitimate complaints and that the complaints procedure itself is a system that provides equal treatment to each complaint. Reasonable adjustments were made to 8 complainants as a result of disability and where complaints related to staff misconduct the deadline for receiving the complaint was often extended.

Only 0.30% of the student population used the Student Complaint Procedure in 2019-20 with half of these related to the impact of COVID-19 and industrial action. Therefore, analysis of equality and diversity data should be undertaken cautiously. However, the over representation of some groups seems to suggest that some groups of students are being treated differently or unfairly. Positively, it appears that these groups have some level of trust or confidence in the system to raise formal complaints but it suggests that individual staff, and potentially the systems within the University, are not treating all students equally, although it can be very challenging to investigate subtle examples of this type of treatment. For BAME students, the very small number of complaints explicitly linking misbehaviour to race and/or racism may indicate a lack of confidence in believing complaints of racist behaviour will be taken seriously. Following discussions with students, OSCCA webpages will be explicit about the race-related training that case handlers and decision-makers have undertaken to increase student confidence.

Complaints not investigated

21 submitted complaints were not investigated: 8 of these were referred back to the service or department for local resolution or referred to an alternative procedure, either within the University or College; and 1 complaint was withdrawn. The other 12 were considered ineligible for reasons including: the matter had already been investigated, that there was insufficient material to investigate, and 6 because they were beyond the normal 28 day timeframe with no valid reason for lateness. Reviews of the out of time decisions were requested in 2 cases but in both cases the matters related to previous academic years and were therefore, significantly out of time.

Student Complaint Procedure - learning

The vast majority of upheld complaints related to the impact of COVID-19 and industrial action. However, even discounting these figures, there has been an increase in the proportion of complaints that have been upheld, from 10% to 17% (6 out of 35). While the figures are low, this does appear to be connected with the increase in complaints regarding staff misconduct, which will hopefully continue to instil confidence in students to report inappropriate behaviour and deter staff from behaving inappropriately (see case study 2).

Case Study 1

Student Complaint Procedure – partially upheld

Case: A student raised a complaint regarding the impact of industrial action and COVID-19. It was found she had missed 37/128 hours of scheduled teaching, promised in advance of the student applying to the course, as a result of industrial action and this had not been replaced or mitigated, although assessments had been amended. This required financial compensation as the remedy. The student also complained of the impact of changing assessments as a result of COVID-19 but it was found that she had been fully informed of the changes as soon as reasonably possible and that the changes were reasonable in the circumstances.

Learning: While it is the right of individual staff to take part in industrial action, the University has a duty to deliver a promised teaching course. If direct replacement of teaching is not possible, other options include: condensing teaching the same topics into a smaller number of hours; putting recordings of lectures or more expansive lecture notes online; offering additional discussion/workshop sessions following the release of a reading list; explicitly offering students the opportunity of further teaching or supervisions. Only amending assessments is insufficient.

Case Study 2

Student Complaint Procedure – upheld

Case: A student raised a complaint about a lecturer on the basis of using sexualised images in lecture notes and for the way that sexual violence was discussed in a small group teaching session. The investigation process used HR procedures and while it was determined that there was no intention from the staff member to behave inappropriately or in a way that distressed the student, more care could have been taken when introducing the topic in small group teaching and different non-sexualised images could have been used within the lecture notes.

Learning: Staff should be mindful of how they introduce emotionally challenging topics, ensuring they appreciate the sensitivity and do not pressure individual students to respond to questions. Staff should be aware of the images they use on handouts or lecture notes, particularly where the images are of people, and ensure that unless relevant, these images are not sexualised.

Examination Review Procedure - statistics

Students can request reviews of formal examination results on the grounds of

- procedural irregularities that have materially affected the results;
- bias or reasonable perception of bias in the examination process;
- withdrawal of academic provision in relation to industrial action or COVID-19; and
- for Graduate Students ineligible for any examination allowance procedure, mitigating circumstances unknown to examiners for good reason.

Figure 2 – Examination Review cases

Year	Group	Exam review stage			Review stage	
		received	investigated	upheld	requests	upheld
2019-2020	Total	77*	34	4	8	1
	Grounds**	a) irregularities: 59 b) bias: 35 c) withdrawal: 22 d) mit circs: 8	a) irregularities: 27 b) bias: 20 c) withdrawal: 2 d) mit circs: 9	a) irregularities: 4 b) bias: 0 c) withdrawal: 0 d) mit circs: 0		
	Course type	UG: 48 PG/Grad: 29	UG: 23 PG/Grad: 11	UG: 2 PG/Grad: 2		
	Gender	Female: 38 Male: 39	Female: 15 Male: 18	Female: 1 Male: 3		
	Racial identity/ Fee status	White: 43 (34 home, 6 EU, 3 overseas) BAME: 30 (14 home, 3 EU, 13 overseas)	White: 22 (17 home, 3 EU, 2 overseas) BAME: 12 (5 home, 2 EU, 5 overseas)	White: 3 (2 home, 1 overseas) BAME: 1 (1 home)		
	Recorded disability	Disability: 15 No known disability: 62	Disability: 7 No known disability: 27	Disability: 0 No known Disability: 4		
2018-2019	Total	88	52	14	13	0
	Grounds**	a) irregularities: 60 b) bias: 38 c) withdrawal: 22 d) mit circs: 9	a) irregularities: 44 b) bias: 20 c) withdrawal: 2 d) mit circs: 5	a) irregularities: 13 b) bias: 1 c) withdrawal: 0 d) mit circs: 1		
	Course type	UG: 47 PG/Grad: 41	UG: 30 PG/Grad: 22	UG: 6 PG/Grad: 8		
	Gender	Female: 41 Male: 47	Female: 23 Male: 29	Female: 6 Male: 8		
	Racial identity/ Fee status	White: 54 (39 home, 10 EU, 5 overseas) BAME: 34 (14 home, 4 EU, 16 overseas)	White: 34 (25 home, 7 EU, 2 overseas) BAME: 18 (6 home, 3 EU, 9 overseas)	White: 7 (5 home, 1 EU, 1 overseas) BAME: 7 (2 home, 5 overseas)		
	Recorded disability	Disability: 23 No known disability: 65	Disability: 19 No known disability: 33	Disability: 5 No known Disability: 9		
2017-2018	Total	77	43	8	12	3
	Grounds**	a) irregularities: 52 b) bias: 33 c) withdrawal: 13 d) mit circs: 11	a) irregularities: 30 b) bias: 18 c) withdrawal: 8 d) mit circs: 7	a) irregularities: 6 b) bias: 1 c) withdrawal: 0 d) mit circs: 1		
	Course type	UG: 50 PG/Grad: 27	UG: 25 PG/Grad: 18	UG: 5 PG/Grad: 3		
	Gender	Female: 22 Male: 55	Female: 10 Male: 33	Female: 1 Male: 7		
	Racial identity/ Fee status	White: 29 (25 home, 3 EU, 1 overseas) BAME: 48 (16 home, 2 EU, 30 overseas)	White: 18 (16 home, 1 EU, 1 overseas) BAME: 25 (9 home, 1 EU, 15 overseas)	White: 5 (4 home, 1 overseas) BAME: 3 (1 home, 2 overseas)		
	Recorded disability	Disability: 19 No known disability: 62	Disability: 6 No known disability: 37	Disability: 1 No known Disability: 7		

* includes 3 ongoing cases, which are therefore not listed in any other column

** some requests include multiple grounds and therefore this figure is greater than the number of requests

Examination Review Procedure - trends

Due to the impact of COVID-19, first and second year undergraduate examinations were formative, not summative. Only summative (formal) examinations can be reviewed using the Examination Review Procedure and therefore, while there was a 10% decrease in the number of reviews received, this figure demonstrates an increase in the proportion of students requesting reviews (1,244 examinations were scheduled by the University in 2019-20 compared to 2,310 in 2018-19). While this increase may result from students' lack of confidence in the marking processes following the late changes to assessments resulting from the impact of COVID-19, the very small number of upheld examination reviews (5% of all cases) evidences the robust processes that examiners employed in the circumstances. No examination reviews were upheld on the basis of a lack of learning opportunities relating to either the impact of industrial action or COVID-19.

Equality and Diversity data

Only 0.3% of the student population requested examination reviews. However, even within this minority of students, it is significant to note that postgraduate/graduate BAME students were more like to report, making up 45% of the postgraduate/graduate examination reviews but only 36% of the postgraduate/graduate student population. This may suggest BAME students have less trust in a marking process that is not anonymised (non-anonymised processes are more typical for postgraduate/graduate students due to the individualised nature of assessments). Other protected characteristics that are measured remain largely proportionate to the student body.

Case Study 3

Examination Review Procedure – upheld and referred back to new examiners for re-examination

Case: A re-examination for a PhD did not include an independent Chair, as set out in the relevant Code of Practice for Research Students. Additional written guidance suggested that an independent Chair was only 'normally' expected but in any case it was found that the relevant department would not normally seek an independent Chair for re-examinations. There was no evidence that an independent Chair would have changed the outcome, but that it would have changed the student's perception of the fairness of the outcome and that it was reasonable to expect the process outlined in the Code of Practice to be followed.

Learning: Examiners must follow procedures laid out in writing to students, for example within the Code of Practice. The remedy where errors occur will be to properly re-run the relevant process.

Case Study 4

Examination Review Procedure – dismissed

Case: A student requested a review on the basis of an error in the examination paper, teaching being amended a result of industrial action and suggesting inappropriate marking because of a disparity in marks across papers. The request was dismissed on the basis that the examiners had been aware of the examination paper error and evidence of the reasonable action taking in response, and had been aware of the missed/amended learning and had made amendments to the examination on that basis. The disparity of marks is academic judgement and not grounds for review. The student reviewed this decision and it was dismissed.

Learning: Where examiners take action and take reasonable action to address issues up front, this is not grounds for an examination review to be upheld.

Procedure for the Review of Decisions of University Bodies - statistics

This procedure is a single stage review process facilitating a review of a decision of an individual application on the grounds of new evidence not previously disclosed for good reason (NE), procedural irregularities (PI) and unreasonable decisions (UD) in relation to formal decisions made by different University bodies about individual student applications.

The types of application that can be subject to review include:

- examination allowances and disregarding terms/intermission made by Examination Access and Mitigation Committee/Applications Committee (EAMC/Apps Cttee) and Board of Graduate Students (BGS)/Postgraduate Committee (PC),
- Faculty Board decisions about progression onto Part III additional attempts (FB Prog)
- Faculty Board decisions for professional exam re-sits (FB re-sit).

Figure 3 – Reviews of Decisions of University Bodies cases

Year	Group	Formal complaint stage		
		received	investigated	upheld
2019-20	Total	48	35	15
	Decision body and grounds*	EAMC: (27 NE, 8 PI, 15 UD) 32 BGS/PC: (2 NE, 6 PI, 7 UD) 8 FB Prog: (1 NE, 1 PI, 3 UD) 4 FB Re-sit: (2 NE, 2 PI, 1 UD) 4	EAMC: (18 NE, 8 PI, 14 UD) 23 BGS/PC: (2 NE, 3 PI, 5 UD) 5 FB Prog: (1 NE, 2 PI, 1UD) 3 FB Re-sit: (2 NE, 2 PI, 1UD) 4	EAMC: (10 NE, 2 UD) 11 BGS: 0 FB Prog: (1 NE, 1 UD) 2 FB Re-sit: (2 NE) 2
	Stu type	UG: 36 PG/Grad: 12	UG: 27 PG/Grad: 8	UG: 13 PG/Grad: 2
	Gender	Female: 26 Male: 22	Female: 17 Male: 18	Female: 8 Male: 7
	Racial identity/ Fee status	White: (19 home, 2 EU, 2 Overseas) 23 BAME: (11 home, 2 EU, 12 overseas) 25	White: (14 home, 2 EU, 1 Overseas) 17 BAME: (9 home, 9 overseas) 18	White: (8 home, 2 EU) 10 BAME: (4 home, 1 overseas) 5
	Recorded disability	Disability: 26 No known disability: 22	Disability: 17 No known disability: 18	Disability: 5 No known disability: 10
	Total	43	34	12
	Decision body	EAMC: 27 BGS: 14 FB Prog: 1 BoE: 1	EAMC: 26 BGS: 7 FB Prog: 1 BoE: 0	EAMC: 10 BGS: 2 FB Prog: 0 BoE: 0
2018-2019	Stu type	UG: 28 PG/Grad: 15	UG: 26 PG/Grad: 8	UG: 10 PG/Grad: 2
	Gender	Female: 22 Male: 21	Female: 16 Male: 18	Female: 4 Male: 8
	Racial identity/ Fee status	White: (12 home, 2 EU, 3 overseas) 16 BAME: (14 home, 1 EU, 11 overseas) 26	White: (9 home, 2 EU, 3 overseas) 14 BAME (12 home, 1 EU, 8 overseas) 21	White: (3 home, 1 Overseas) 4 BAME: (5 home, 3 overseas) 8
	Recorded disability	Disability: 18 No known disability: 25	Disability: 18 No known disability: 16	Disability: 7 No known Disability: 5
	Total	40	36	18
	Decision body	Apps Cttee: 24 BGS: 7 FB Prog: 5 FB re-sit: 2 BoE: 2	EAMC: 22 BGS: 6 FB Prog: 5 FB re-sit: 2 BoE: 1	EAMC: 12 BGS: 3 FB Prog: 2 FB re-sit: 1 BoE: 0
	Stu type	UG: 32 PG/Grad: 8	UG: 30 PG/Grad: 6	UG: 15 PG/Grad: 3
	Gender	Female: 16 Male: 24	Female:13 Male: 23	Female: 3 Male: 15
2017-2018	Racial identity/ Fee status	White: (19 home, 3 EU) 22 BAME: (8 home, 10 overseas) 18	White: (7 home, 3 EU) 10 BAME: (8 home, 8 overseas) 16	White: (5 home, 3 EU) 8 BAME: (4 home, 6 overseas) 10
	Recorded disability	Disability: 13 No known disability: 27	Disability: 12 No known disability: 24	Disability: 5 No known disability: 13

* cases can include multiple grounds and therefore the grounds will not equal the number of cases

Procedure for the Review of Decisions of University Bodies - trends

The vast majority of these reviews are upheld on the basis of new evidence and while students are required to show good cause why the evidence was not previously available, these are not reviews that the relevant decision bodies could have guarded against.

The more commonly reviewed decisions, those made by Examination Access and Mitigation Committee (EAMC) are a reflection of the significant number of cases that the EAMC consider every year: 779 applications for examination allowances, including intermission/disregard terms and 45 applications for alternative modes of assessment.

Equality and Diversity data

Due to the types of decisions this procedure reviews, it is unsurprising that it is accessed disproportionately by disabled students with a recorded disability, this is because:

- It is more likely that unforeseen circumstances will have a more significant impact on a disabled student and therefore, lead to an application for an examination allowance, intermission or exceptional third attempts or special consideration for progression to Part III;
- Alternative modes of assessment are specifically for disabled students.

However, there is also a significant (and disproportionate in comparison with the student population) rise in the number of students from Black, Asian or Minority Ethnic backgrounds choosing to review decisions. This would seem to reflect the trend in other procedures that BAME students who are submitting individual non-anonymised applications suspect that they have not been treated fairly. While the overall percentage of BAME students using this procedure remains very small, it is still perhaps useful to note that the 'upheld' reviews provide a more equal distribution among student ethnicities, suggesting that while we need to build confidence in students, the review outcomes do not suggest systemic problems with the decision-making processes themselves.

Case Study 5

Procedure for the Review of Decisions of University Bodies – investigated and dismissed

Case: A student had requested to have an exceptional third attempt at an examination that had received a narrow failure, on the basis that they were disabled. The Reviewer found that all adjustments had been put in place by the Department and the student was satisfied with them, and there had been no circumstances that had worsened or changed the student's condition.

Learning: The presence of a disability, which is sufficiently mitigated through reasonable adjustments and remains unchanged, does not in itself warrant further mitigation.

Case Study 6

Procedure for the Review of Decisions of University Bodies – upheld and referred back to EAMC

Case: The student had requested reconsideration of formal examination results on the basis that it was unclear whether the safety net had been taken into consideration (unreasonable decision) and on the ground of new evidence. The Reviewer upheld the review on both grounds, on the basis that the reasoning in the decision letter was not explicit about whether consideration of this matter had taken place or not and that the evidence, for good reason hadn't previously been disclosed.

Learning: Decision letters need to include all matters that were considered by the relevant decision-making body or they may be subject to findings of 'unreasonable decisions'.

Special Ordinance on Precautionary Action

This procedure is used where a University procedure, College procedure or police investigation/criminal proceedings is ongoing. Its purpose is to enable a full investigation to take place or to protect the student or other members of the Collegiate University community whilst a matter is being investigated. Once the underlying procedure has finished, the precautionary action stops.

Precautionary action is risk-based and not evidence of wrongdoing. It is in addition to automatic requirements in the Student Discipline Procedure that a respondent cannot contact or approach any complainants or witnesses. Equality data is limited so that cases cannot be identified.

Figure 4 – Precautionary action procedure

Year	Group	Cases
2019-2020	Total	4
	Detail	Case 1: complaint relating to sexual misconduct, precautionary action put in place including limiting contact with complainant and restricting access to University buildings. Case 2: complaint relating to sexual misconduct, physical misconduct and abusive behaviour, precautionary action initially put in place limiting contact with complainant; subsequent alleged breach of actions resulting in suspension from physical studies with restricted return permitted later Case 3: complaint relating to sexual misconduct, precautionary action put in place including limiting contact with complainant and restricting access to University buildings Case 4: complaint relating to physical misconduct and abusive behaviour, precautionary action put in place including limiting contact with complainant and restricting access to University buildings
	Gender	Female: 0 Male: 4
2018-2019	Total	6
	Detail	Case 1: complaint relating to harassing messages – multiple respondents, precautionary action limited contact with complainant and prevented respondents from discussing complaint Case 2: complaint relating to actions – multiple respondents, precautionary action limited contact with the complainant and prevented respondents from discussing complaint Case 3: complaint related to fraudulent behaviour – suspended from studies and prevented from accessing University buildings whilst investigation is ongoing
	Gender	Female: 2 Male: 4
2017-2018	Total	2
	Detail	Case 1: complaint relating to sexual misconduct, precautionary action put in place limiting contact with complainant and restricting access to certain University buildings. Case 2: complaint relating to sexual misconduct and abusive behaviour, action put in place limiting contact with complainant and restricting access to certain University buildings
	Gender	Female: 0 Male: 2

Procedure to Determine Fitness to Study

The University's fitness to study procedure is used only where it is not possible to use a College procedure, usually because the behaviour is occurring within a Department or Faculty, or the College wishes to retain an entirely support relationship with the student.

Figure 5 – fitness to study cases

Year	Cases
2019-2020	Case 1 – a student sent a number of potentially concerning and abusive messages to staff and students within the College setting. The Fitness to Study Panel recommended a series of supportive actions
2018-2019	Case 1: a student sent a number of harassing and threatening messages to staff. The student refused to intermit and fitness to study was implemented, the student then withdrew from the University.
2017-2018	No cases

Procedure for Student Harassment & Sexual Misconduct

This Procedure provides students with a process by which to report any form of student harassment or sexual misconduct for the purposes of wanting to limit the interaction between themselves and the other student by agreement. There is no investigation or findings relating to the alleged behaviour, although a breach of any agreement made using this procedure would amount to a breach of the University's Rules of Behaviour and be subject to the Student Disciplinary Procedure.

Complainants are also able to refer their original complaint to the student disciplinary procedures following this informal procedure if they are not satisfied with the outcome.

Cases may not be investigated because they are referred to another procedure, they may be reported by someone who is not a student or the complainant may choose to withdraw or stop engaging with the procedure.

Figure 6 – Student Harassment and Sexual Misconduct cases

Year	Group	received	investigated	Resulting in agreement
2018-2019	Total cases	11	11	8
	Case type	Sexual act: 9 Harassment: 2		
	Complainant gender	Female: 9 Male: 2		
	Respondent gender	Female: 1 Male: 10		
2018-2019	Total cases	10*	4	3
	Case type	Sexual act: 6 Harassment: 4		
	Complainant gender	Female: 8 Male: 2		
	Respondent gender	Female: 2 Male: 10		
2017-2018	Total cases	6**	3	2
	Case type	Sexual acts: 5 Harassment: 1		
	Complainant gender	Female: 6 Male: 2		
	Respondent gender	Female: 0 Male: 6		

* 1 case had 3 respondents

** 1 case had 3 complainants

The number of investigations carried out under this procedure has nearly tripled in the past year. While this procedure remains a lesser known and less expected option for students who have been affected by harassment or sexual misconduct from another student, it is seen by some as the only workable option. It provides much needed action without the need for a formal University finding about the behaviour, which often takes place in private and of which there is little independent evidence.

This procedure requires a number of face-to-face meetings with the student and is resource intensive. However, it has been able to produce arrangements that would not have been possible using other formal procedures and feedback received from both complainant and respondent students regarding this procedure continues to be positive.

The majority of complainants being female and majority of respondents being male is indicative of the trends relating to sexual misconduct and is not procedure-specific.

Student Disciplinary Procedure - statistics

This procedure enables the University to investigate and sanction students following reported inappropriate behaviour. Incidents from 1 October 2019 onwards use a revised procedure, with a specialist OSCCA investigator. On the balance of probabilities, the Student Discipline Officer (minor matters) or Discipline Committee determines whether students have breached the University's Rules of Behaviour.

Before this time, the University Advocate investigated complaints. The Advocate could choose to 'charge' the student: if so, the Discipline Committee consider whether a student was guilty of breaching the University's general regulations.

Figure 7 – Student discipline case for behaviour after 1 October 2019

Year	Group	Formal stage			Appeal stage	
		Reports received	investigated	Found breach(out of 16 ^{***})	R'cvd	upheld
2019-2020	Total	34^{**}	27	(15 Disc Coms, 1 SDO) 16	2	0
	Allegations*	Physical misconduct 2 Sexual misconduct 7 Abusive behaviour 11 academic misconduct 15 damage property 1 endanger safety 3 comply w/ instructions 2	Physical misconduct 1 Sexual misconduct 7 Abusive behaviour 7 academic misconduct 15 damage property 0 endanger safety 0 comply w/ instructions 2	Physical misconduct 2 Sexual misconduct 3 Abusive behaviour 1 academic misconduct 13 damage property 0 endanger safety 0 comply w/ instructions 1		
	Respondent	UG: 26 PG/Grad: 6	UG: 23 PG/Grad: 4	UG: 14 PG/Grad: 2		
	Respondent	Female: 8 Male: 24	Female: 6 Male: 21	Female: 4 Male: 12		
	Respondent	White students: 21 (19 home, 2 EU)	White students: 18 (16 home, 2 EU)	White students: 13 (12 home, 1 EU)		
	Racial identity/	BAME students: 4 (2 home, 2 overseas)	BAME students: 4 (2 home, 2 overseas)	BAME students: 2 (1 home, 1 overseas)		
	Fee status	Information refused 5	Information refused 5	Information refused: 1		
	Respondent disability	Disability: 11 No known disability: 20 Information refused: 1	Disability: 7 No known disability: 19 Information refused: 1	Disability: 4 No known Disability: 12 Information refused: 0		
	Reporter type	Student: 15 Staff: 17 Member of public: 2	Student: 11 Staff: 15 Member of public: 1	Student: 3 Staff: 13 Member of public: 0		
	Reporter	Female: 15 Male: 19	Female: 14 Male: 13	Female: 5 Male: 11		

* Multiple allegations can be included in a single report

** 2 cases relate to unidentified respondents and therefore respondent details are not included,

*** 11 investigations are still ongoing and therefore this column and the appeal stage do not include these cases

Figure 8 – Student discipline cases for behaviour before 1 October 2019

Year	Group	Received/ investigated	Charge /found	Penalty	Appeal
2019-2020	Total	3		<ul style="list-style-type: none"> That the student should be permitted to re-submit a substantially revised dissertation within the next twelve months, for it to be examined by new Examiners. 	0
	Case type	Harassment: 2 Unfair means: 1	1/0 1/1		
	Gender	Female: 2 Male: 17			
2018-2019	Total	19	4/3	<ul style="list-style-type: none"> https://www.admin.cam.ac.uk/reporter/2018-19/weekly/6521/section1.shtml#heading2-4 https://www.admin.cam.ac.uk/reporter/2019-20/weekly/6567/section1.shtml#heading2-5 Appeal case: student received conviction for harassment of a member of the public, outcome: completed current year of study remotely and suspended for 2 years 	1 not upheld
	Case type	Harassment: 12 Unfair means: 3 Fraud: 1 Not following instructions: 2	3/2 1/1 0 0		
	Gender	Female: 2 Male: 17			
2017-2018	Total	12	6/6	<ul style="list-style-type: none"> http://www.admin.cam.ac.uk/reporter/2017-18/weekly/6510/section1.shtml#heading2-6 https://www.admin.cam.ac.uk/reporter/2018-19/weekly/6526/section1.shtml#heading2-6 http://www.admin.cam.ac.uk/reporter/2018-19/weekly/6525/section1.shtml#heading2-6 https://www.admin.cam.ac.uk/reporter/2018-19/weekly/6524/section1.shtml#heading2-4 https://www.admin.cam.ac.uk/reporter/2018-19/weekly/6521/section1.shtml#heading2-4 	0
	Case type	Harassment: 5 Unfair means: 8	1/1 5/5		
	Gender	Female: 2 Male: 12			

Student Disciplinary Procedure - trends

In the past year, discipline cases have split into two main categories: academic misconduct; and personal misconduct (physical misconduct, sexual misconduct, and abusive behaviour). A number of cases in the second category include multiple types of misconduct. The challenges and equality and data for both categories are different and therefore, the data, penalties and analysis are set out separately.

Academic misconduct

While proportionately the number of cases are very low both across the student population and in comparison to other universities, a significant increase was seen in the number of academic misconduct cases. As a result of assessment changes due to COVID-19, there was a change to the type of examination misconduct seen, where students would have plagiarised material within unseen examination. The common explanation for this misconduct was that text had been copied from students' own notes into their answers. These notes had originally been made with the expectation of being used for unseen, closed book examinations and then when the assessment type changed, the students had forgotten that their own notes had included the words and ideas of others. This resulted in students with multiple assessments with findings of plagiarism.

In addition, cases that would have ordinarily been handled solely by examiners were referred to the Discipline Procedure as a result of the 'safety net', which would have resulted in students receiving a class that did not reflect their plagiarised assessments.

Due to the unusual circumstance and the significant additional mitigation relevant to many of the cases, the sanctions imposed by the Discipline Committee and SDO were more varied than would normally be expected, and were as follows:

Figure 9 – Academic misconduct penalties

Year	Penalties	Respondent details	Department
2019-2020	<ul style="list-style-type: none"> Written apology, written reflection and educative session Marks for assessments amended to 0 Marks for two assessments amended to 40 pass mark and no safety net Dissertation mark 0 Assessment amended 0, permitted to re-sit and written apology Re-mark essay without credit for plagiarised material, and written reflection Re-submit dissertation at pass in order to progress, written apology Re-mark essay without credit for plagiarised material, and written apology Mark for assessment reduced by 10% and no safety net Mark for assessment amended to 0 and no safety net Reduction in degree class from 2.2 to 3 Assessments reduced by 10% & 5%, written apology and written reflection 	Male: 9 Female: 4 White 10 BAME 2 Info Refuse 1 Home 12 Overseas 1 Disability 4 No disability 9	MPhil Computer science PBS Tripos MSt International Relations Medical Sciences Tripos BBS Tripos x 4 English Tripos Theology Tripos x2 Philosophy Tripos MBCH

Equality and Diversity data

Contrary to national statistics, and perhaps linked to the assessment changes, the vast majority of the respondent students were from the UK. Previously, the vast majority of academic misconduct cases related to students from the EU and overseas.

In other areas the cases represent such a small amount of the student population that it is not possible to draw any strong conclusions.

Student Disciplinary Procedure - trends

Personal misconduct (physical misconduct, sexual misconduct and abusive behaviour)

The most challenging aspect of this type of misconduct has been the time taken to conduct investigations. Almost all of the ongoing investigations relate to personal misconduct and the reasons for extended timeframes vary from police involvement, significant numbers of witnesses and capacity of the investigator. The investigation time is mitigated by the interim actions imposed on respondent students – not being permitted to contact or approach the reporting student and any witnesses, and in some cases further restrictions to College or University buildings and facilities but this is still far from ideal. To improve the situation, the University has permitted OSCCA to recruit an additional investigator.

In relation to apologies as a penalty, these are all reviewed by the Chair of the Committee. Apologies are only sent on to the reporting person where this is wanted by them. The respondent does not know whether the reporting person received a copy of the apology

Figure 10 – Personal misconduct penalties

Year	Penalties – issued by Discipline Committee	Respondent details		Reporting person details	
2019-2020	<ul style="list-style-type: none"> No contact order, restrictions on building access, written warning, written apology No contact order, temporary suspension from access to physical buildings, restrictions on building access, College ban, engage with specialist service to provide rehabilitative work and assessment, written apology, written reflection No contact order, building restrictions, online course, reflective discussion, 	Male:	3	Female:	3
		White	3	White	3
		Home	2	Home	3
		EU	1		
		No disability	3	No disability	3
	Ongoing cases relating to personal misconduct	Respondent details		Reporting person details	
	<ul style="list-style-type: none"> 9 cases in total Multiple respondents/reporters 3 cases relate to single respondent student 3 cases relate to single reporting student Time taken to report 4 cases reported 6 months after behaviour took place All but one reported during the summer vacation period 2020 	Male:	9	Female:	9
		White	4	1 staff 8 students	
		BAME	1	White	8
		Info refused	4		
		Home	9	Home	7
				EU	1
		No disability	5	No disability	6
		Known disability	4	Known disability	2

Equality and Diversity data

The gender of respondent and reporting students is starkly represented through this data, although it is important that the University continues to maintain gender neutral campaigns around reporting so as not to introduce further barriers to reporting students who may already feel marginalised.

In addition, and in reference to the statistics for all potential disciplinary offences, although the figures are very small, 12 out of 14 of the students reporting any inappropriate behaviour were white, and one 'information refused'. As a result, it appears that students from Black, Asian and Minority Ethnicities are not proportionately using this procedure. Engagement with the Cambridge SU BME Officer and the BME student campaign will attempt to address barriers in reporting.

Anonymous reporting tool

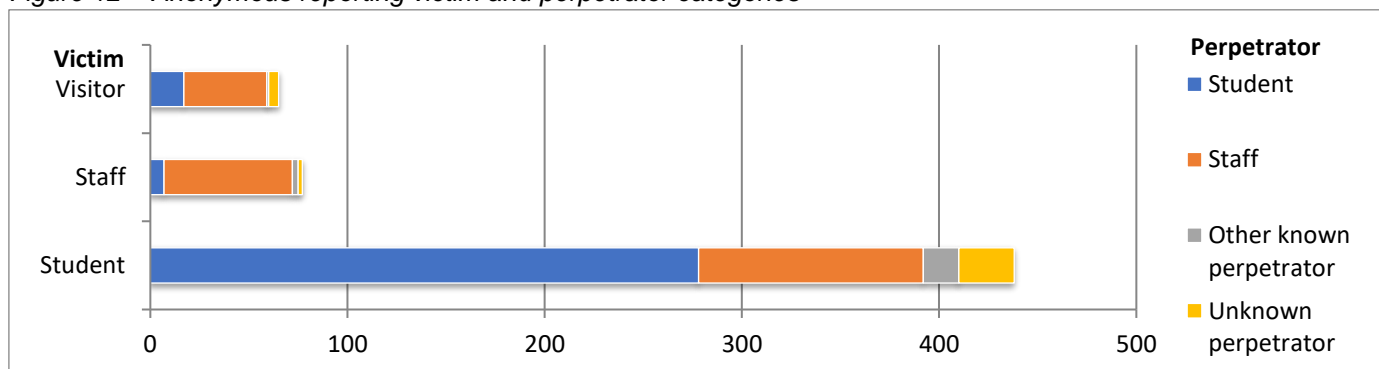
Since 5 May 2017, the University has been enabling students, staff and visitors to anonymously record incidents of harassment, sexual misconduct and discrimination. These reports are not verifiable; however, they indicate the types of behaviour that are occurring within the Collegiate University community.

Figure 11 – anonymous reporting data by time taken to report

Year	Incident took place in the:								Total
	Last week		Last month		Last year		Over a year		
	No.	%	No.	%	No.	%	No.	%	
2019-2020	53	43%	25	20%	30	24%	15	12%	123
2018-2019	55	43%	18	14%	33	26%	23	18%	129
2017-2018 Breaking the Silence launch	19	10%	29	15%	57	30%	87	46%	189
2017-2016 (from May 2017) Anonymous reporting began	12	13%	13	14%	38	41%	30	32%	93

This table demonstrates the continued use of the anonymous reporting system, despite no significant ongoing University campaign efforts. It shows that when students (and to a lesser extent staff and visitors) first started using this mechanism, they were primarily reporting issues that had taken place some time ago. However, over the years this trend has changed and now, either because of their knowledge of the tool or because they are looking for University reporting tools earlier, the majority of users are reporting incidents within a week of them occurring. This suggests that a greater proportion of the collegiate University community are recognising or more comfortable with reporting incidents of harassment and discrimination earlier.

Figure 12 – Anonymous reporting victim and perpetrator categories



The majority of reports focus on student on student misconduct, but this year has seen students report 32 incidents of staff misconduct, half of these reports relate to making offensive comments about perceived personal traits, and these ranged from age, disability, gender, sexual orientation, ethnicity and nationality.

In the last two years, the University has collected data on the proportion of users who have sought support for the behaviour that they have reported. It is promising to see that those with no intention to receive support has reduced from a third to a quarter.

Figure 13 – anonymous reporting data – accessing support

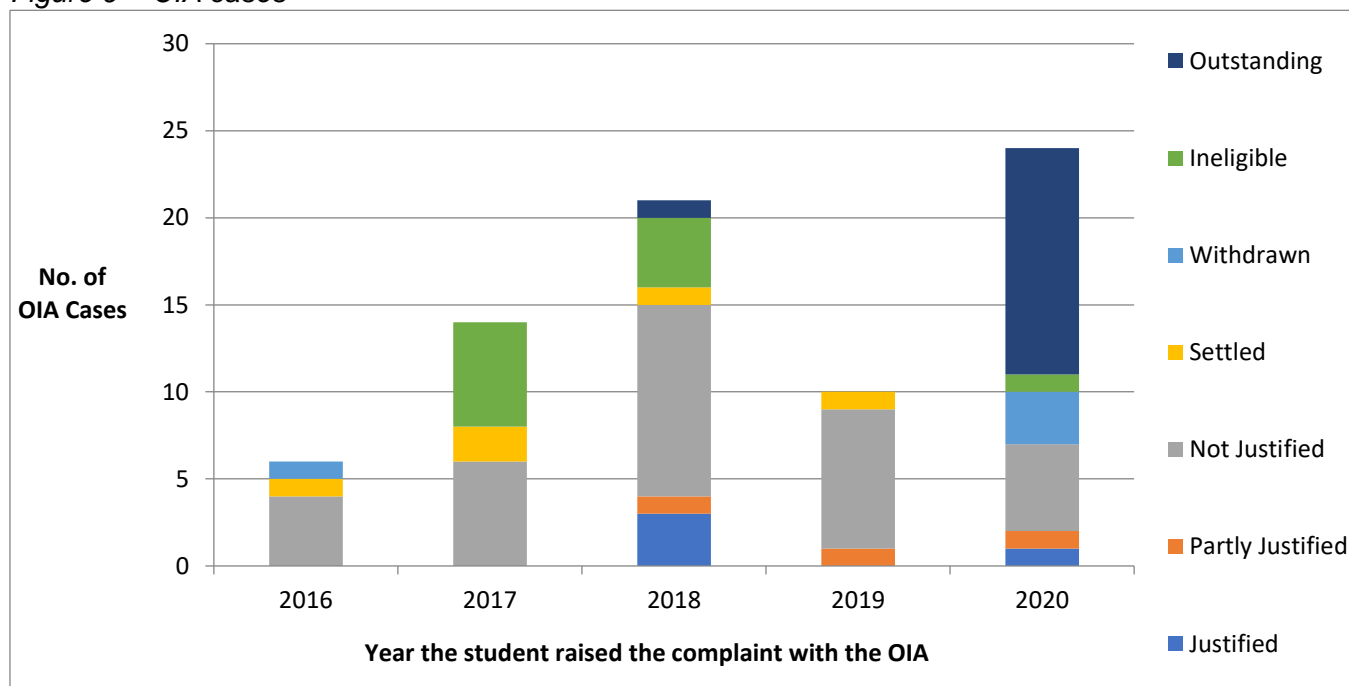
Year	Reporter has sought support from:												Total
	Uni/College		external		Family/friend		Will do soon		No support		unanswered		
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	
2019-2020	26	21%	13	11%	35	28%	17	14%	29	24%	3	2%	123
2018-2019	26	20%	3	2%	46	36%	12	9%	42	33%	0	0%	129

Office of the Independent Adjudicator cases

Where students have completed a University procedure, they are able to raise a complaint with the Office of the Independent Adjudicator (OIA), the external Ombudsman. The OIA will consider whether the University has followed its own procedures and whether the actions taken are reasonable in all the circumstances.

The OIA produce case studies, public interest cases and a good practice framework to help provide guidance to universities on what is expected practice.

Figure 9 – OIA cases



The justified cases are summarised as follows:

Case Study 7

OIA case – justified outcome: student complaint originally considered out of time

Case: A former student had raised a number of complaints about their student experience and that of others while undertaking a PhD that had taken place between 4 and 1 years ago. The former student initially approached the Department who, without reference to the Student Complaint procedure, considered the issues that had been raised. When the outcome did not satisfy the former student, the former student raised it as a formal complaint and it was deemed out of time.

The OIA stated that because the University had taken action less than 28 days ago in relation to the matter (the Department's investigation) that the complaint was eligible to be investigated using the Student Complaint Procedure.

Noting that the Department did not investigate this historic matter with reference to the Student Complaint Procedure, any Department, Faculty or Service who wish to investigate a former student's complaint are advised to seek advice from OSCCA.

Case Study 8

OIA case – partly justified outcome: reconsider examination review request and review General Board's Education Committee's examination guidance

Case: The student made an application for an examination review on the basis that they considered there may have been a procedural irregularity in the marking process. The examiners confirmed that the marking process had been completed as normal. However, the student was dissatisfied as the only evidence of the marking process was the final mark book.

The OIA considered that there was insufficient evidence to confirm that the marking process had been completed without irregularity and that the guidance was unclear about the records that should be retained. The OIA held that non-contemporaneous statements from the examiners confirming that the marking process had taken place and minutes of the examiners' meeting were not sufficient evidence. The OIA required the student's assessments to be re-marked and the guidance to reviewed.

The examination guidance has now been reviewed and re-issued and Examiners are asked to review their policies in line with the revised guidance to ensure that there is sufficient evidence of marking processes being undertaken and that this evidence is retained for an appropriate length of time. While questioning academic judgement is not permissible, destroying all evidence that academic judgement has taken place following the formal confirmation of a student's final marks is likely to be inappropriate.

OIA 2019 statement

Each calendar year the OIA produce a statement for each HE provider showing how the comparison between the provider and the 'band' median. Bands are defined by the number of students at each provider and impacts the provider's subscription fee. The University of Cambridge's 2019 annual statement can be read here in full:

<https://statements.oiahe.org.uk/statement/NjhkYmFmYjYtOGI2Yy00OWQ3LWFmZjYtYWRRjZDg5OTZjNGEyLzlwMTk%3D>.

It is noted that in 2019 the University for the first time had over 20,000 students and therefore, came within the lowest section of band F. Therefore, as in previous statements the comparison data was not necessarily directly comparable as it related to institutions with between 12,001-20,000; similarly the band data may not be directly comparable as band F includes institutions with 20,001-30,000 but provides a useful guide.