

Fitness to Practice

Student Casework – Education Services

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1. Purpose, Status and Authority

Policy Purpose and Institutional Intent

This Policy establishes the University's institutional commitment to ensuring that students enrolled on professional programmes meet the standards of professional suitability and fitness to practice required for safe, ethical, and effective practice in regulated professions.

The Policy serves the following strategic purposes:

- **Public protection:** Safeguarding the public, service users, patients, clients, and pupils from harm
- **Professional confidence:** Upholding professional standards and public confidence in the relevant professions
- **Regulatory compliance:** Ensuring compliance with Professional, Statutory, and Regulatory Body (PSRB) and Alternative Regulatory Body (ARB) requirements and reporting duties
- **Educational responsibility:** Supporting students to meet professional standards wherever possible
- **Award integrity:** Ensuring that awards conferring eligibility to practice are only made where fitness to practice is demonstrated

This Policy is **protective rather than punitive**. It operates within the University's Behaviour, Health and Practice Framework and reflects the standard of a reasonably competent higher education institution acting within its institutional responsibilities under common law.

Policy Status and Governance Position

This is a University-level policy approved under the Student Policy Framework. It forms part of the unified Behaviour, Health and Practice Framework and should be read alongside the Student Conduct Policy, Support to Study Policy, Academic Regulations, and relevant PSRB (or ARB) codes and guidance.

Delegated Authority

Decisions under this Policy are made under authority delegated by the Vice-Chancellor and Academic Board. The University retains overall responsibility for all fitness to practice determinations, including where delivery is through collaborative provision or partnership arrangements.

Institutional Decision Making vs Regulatory Determination

The University does not make regulatory decisions declaring that someone is "fit to practice" (or "not fit to practice") in the professional-regulator sense. The University's decisions under this Policy are provider decisions about:

- A student's continuation on a programme
- Placement participation
- Whether an award conferring eligibility to practice should be made
- Reporting duties to PSRBs and regulators

Professional registration and licensing decisions sit with the relevant PSRB or regulator. A PSRB may refuse registration even where a student completes a degree.

References to "fitness to practice" in this Policy describe the University's educational and provider assessment of a student's suitability for professional training and awards, including the management of risk, placements, and PSRB obligations. They do not constitute PSRB or regulatory fitness to practice determinations.

2. Scope and Applicability

Students and Programmes in Scope

This Policy applies to students enrolled on programmes which:

- Lead directly to professional registration, authorisation to practice, or accreditation; and/or
- Involve placements or professional practice where students have responsibility for patients, clients, service users, pupils, or the wider public; and/or
- Are subject to PSRB or ARB requirements relating to conduct, good character, health, or professional behaviour

Programmes within scope are those meeting the criteria set out in Schedule A (Professional, Statutory and Regulatory Body and Alternative Regulatory Body Programmes within Scope).

Contexts and Settings

This Policy applies to concerns arising:

- On University premises
- During placements, work-based learning, or professional practice
- In online or digital environments
- Off-campus, where conduct, health, or other matters may reasonably affect professional suitability, public protection, or public confidence

Student Journey Application

Fitness to practice proceedings may be brought when a student is:

- Enrolled and actively studying
- Temporarily withdrawn, interrupted, dormant, or otherwise not actively studying but remains registered
- Withdrawn from the programme after concerns are raised, where continuation is necessary for public protection, PSRB reporting, or other regulatory or statutory body reporting

Collaborative Provision

This Policy applies equally to students studying under collaborative provision arrangements (franchised, validated, joint awards, placement-based provision). The University retains overall responsibility for fitness to practice decisions even where delivery is by a partner organisation.

Concerns may be identified and referred by partner organisations but will normally be considered through University processes unless explicitly governed by agreed partnership arrangements.

Apprentices

This Policy applies equally to students on degree apprenticeships, recognising their dual status as students and employees. The University will coordinate appropriately with employer processes and apprenticeship agreements while maintaining decision-making authority for fitness to practice determinations.

Pre-Admission Concerns

Pre-admission concerns (matters that occurred or existed prior to enrolment but are disclosed or identified after enrolment) should normally be considered under admissions and selection processes rather than through this Policy, unless the concerns relate directly to fitness to practice matters arising during the course of study.

3. Core Principles

All fitness to practice processes, regardless of stage or complexity, must adhere to the following institutional commitments:

Public Protection as Overriding Consideration

Public protection and professional confidence are overriding considerations in all fitness to practice decision-making. Where there is tension between individual student interests and public protection, the latter takes precedence.

Lawfulness, Fairness, and Transparency

The University ensures that all fitness to practice processes are:

- Lawful, operating in compliance with consumer protection law, the Equality Act 2010, UK GDPR and Data Protection Act 2018, and all relevant statutory obligations
- Fair, consistent with natural justice principles and the Office of the Independent Adjudicator (OIA) Good Practice Framework
- Transparent, ensuring students understand what to expect, how decisions are made, and their rights throughout
- Aligned with regulatory expectations, including Office for Students (OfS) conditions of registration and PSRB requirements

Proportionality and Escalation

The University applies proportionality in all fitness to practice decision-making, with escalation only where necessary. This includes:

- Early resolution and supportive intervention wherever appropriate
- Structured escalation from informal support through to formal determination where required by seriousness, risk, or regulatory obligations
- Least restrictive outcomes sufficient to achieve legitimate aims (public protection, professional standards, risk management)

Evidence-Based Decision-Making

All fitness to practice determinations must be:

- Founded on evidence: Decisions are based on careful assessment of relevant, available evidence
- Subject to appropriate standards: The University applies the balance of probabilities standard when establishing facts of behaviour
- Focused on facts of behaviour: What a student did or did not do, and the observable impact, rather than underlying cause, diagnosis, or explanation

Health, wellbeing, disability, or personal circumstances may be relevant to support, mitigation, and outcome but do not of themselves determine whether behaviour occurred or whether professional standards were met.

Consistency and Transparency

The University ensures:

- Consistency of decision-making across cases, stages, and professional domains
- Transparency in processes, criteria, and outcomes
- Clear written reasons for all decisions affecting student status or continuation

Equality, Diversity, and Inclusion

This Policy is applied in accordance with the University's commitments under the Equality Act 2010 and the Public Sector Equality Duty. Decision-making adopts an equity-led approach, ensuring:

- Procedural fairness, accessibility, and proportionality
- Bias-aware practice
- Consideration of reasonable adjustments
- Consideration of structural and systemic factors
- Least restrictive means of achieving legitimate aims
- Recording of relevant equality considerations in decision rationales

The University will monitor for differential impact and take action where patterns or disparities are identified.

Supportive and Educational Responses

The University commits to supportive and educational responses where relevant and appropriate, particularly where concerns relate to health, wellbeing, or insight, balancing individual support with community safety and professional standards.

Freedom of Speech and Academic Freedom

This Policy is applied in line with the University's commitment to securing lawful freedom of speech and academic freedom, including the expression of lawful views that may be controversial or unpopular.

Action under this Policy is concerned with the manner, context, and impact of behaviour, not the lawful content of expression, and will be lawful, necessary, and proportionate. The University balances freedom of expression with safeguarding responsibilities, equality duties, and the rights and dignity of others.

Safeguarding, Wellbeing, and Institutional Responsibilities

The University ensures:

- Sensitive conduct of proceedings, acknowledging potential stress for students and others involved
- Appropriate support and reasonable adjustments throughout processes
- Trauma-informed approaches in sensitive cases
- Precautionary measures where necessary to ensure safety during processes

The University is not a provider of medical, therapeutic, or statutory intervention. Where behaviour, wellbeing, or risk exceeds what can reasonably be managed through University processes, escalation pathways are to statutory services, emergency services, and/or emergency contacts in accordance with safeguarding and legal obligations.

4. Decision-Making Standards

Standard of Proof

The University applies the balance of probabilities standard when establishing facts of behaviour or determining contested issues: the decision-maker must decide whether it is more likely than not that alleged conduct or circumstances are proven.

Focus on Facts of Behaviour

In considering concerns, the University focuses on establishing the **facts of behaviour**: what a student did or did not do, and the observable impact of that behaviour.

The University recognises that behaviour may arise in the context of health, wellbeing, disability, stress, or other personal circumstances. Such factors may be relevant to support, mitigation, and outcome but do not of themselves determine whether behaviour occurred or whether professional standards were met.

Assessment of Fitness to Practise and Professional Suitability

In determining fitness to practice and professional suitability, the University will:

- Establish the relevant facts of behaviour
- Consider whether those facts indicate a potential impairment of fitness to practice or professional suitability
- Separately consider any health, disability, or mitigating factors in determining proportionate and supportive responses

This approach ensures that decisions are fair, transparent, evidence-based, consistent with regulatory and PSRB expectations, and focused on public protection, professional confidence, and safe practice while recognising institutional responsibilities to students.

Decision Domains

Fitness to practice and professional suitability concerns may relate to:

- **Conduct:** Behaviour that may undermine trust, integrity, safeguarding, public confidence, or professional boundaries
- **Fitness and wellness:** Health or wellbeing issues that may impact safe practice or professional suitability
- **Professional standards:** PSRB codes, placement expectations, and behaviours required for regulated or professional practice

Proportionality in Outcomes

All outcomes must be:

- Proportionate to the circumstances, seriousness, impact, and risk
- Necessary to achieve legitimate aims (public protection, professional standards, risk management, confidence in the profession and the University's awards)
- Justified by reference to the evidence and relevant factors
- Consistent with established frameworks and precedent
- Documented with clear reasons

5. Relationship to Other Policies

Position within the Behaviour, Health and Practice Framework

This Policy forms part of the University's Behaviour, Health and Practice Framework. It provides the overarching framework for determining whether a student remains professionally suitable and/or fit to practice for the purposes of continuation on professional programmes, placement participation, and eligibility for awards conferring entry to a profession.

Primary Route for Professional Programmes

Students on professionally regulated or practice-based programmes are managed under this Policy for all relevant concerns, whether those concerns relate to conduct, wellbeing, or professional suitability.

This Policy operates as the single primary route and draws, where appropriate, on the terms, definitions, and principles set out in the Student Conduct and Fitness to Study policies to inform decision-making. This approach:

- Avoids duplication
- Ensures consistency

- Maintains a clear focus on professional standards, public protection, and procedural fairness
- Prevents students being placed under multiple policies or processes

Coordination with Student Conduct and Fitness to Study Policies

All students enrolled on PSRB-related programmes remain subject to this Policy, regardless of whether the concerns raised have a direct professional, clinical, conduct, health, wellbeing or placement dimension. Where this Policy refers to concepts, definitions or thresholds that are also used in the Student Conduct Policy and/or the Fitness to Study Policy, those terms are adopted for consistency and clarity and are not intended to create a separate route for consideration under those policies.

Single-Process Principle and Avoidance of Duplication

The University commits to dealing with a given matter under one primary policy route at a time to avoid double jeopardy or conflicting decisions.

Where a matter implicates multiple policy areas, the responsible senior officer determines the appropriate primary route and ensures coordination of processes.

The University does not impose multiple penalties for the same underlying conduct.

Incorporation of Cross-Cutting Policies

This Policy operates in conjunction with and incorporates by reference:

- Behaviour, Health and Practice Panels Policy: Governing composition, authority, procedures, and safeguards for formal case panels
- Case Outcomes Policy: Governing the range of outcomes, criteria for their imposition, authority, review arrangements, and compliance
- Behaviour, Health and Practice Appeals Policy: Governing grounds, scope, process, timescales, and outcomes of appeals
- Reporting and Precautionary Actions Policy: Governing criteria, scope, procedures, authority, review mechanisms, and safeguards for precautionary actions
- Return to Study Policy: Governing criteria, processes, and decision-making arrangements for return following interruption or restriction
- Definitions Document: Providing authoritative definitions of key terms across the Behaviour, Health and Practice framework

Full procedural detail, governance arrangements, and operational guidance are set out in these policies and are not duplicated within this Policy.

6. Appeals, External Review, and Institutional Accountability

Internal Appeal Rights

Students have the right to appeal decisions made under this Policy on specific, defined grounds. Appeals are focused reviews of process and decision, not re-hearings.

The grounds, scope, process, timescales, and outcomes of appeals are governed by the Behaviour, Health and Practice Appeals Policy, which ensures fairness, accessibility, independence, and compliance with regulatory expectations for effective internal review.

External Oversight: Office of the Independent Adjudicator (OIA)

The University is subject to external review by the Office of the Independent Adjudicator for Higher Education (OIA), an independent ombudsman that reviews whether the University's processes and decisions were fair and reasonable.

The University's fitness to practice processes align with the OIA Good Practice Framework, ensuring sector-standard fairness and rigour.

Students normally have access to the OIA following exhaustion of internal procedures and receipt of a Completion of Procedures letter.

Professional Body and Legal Remedies

In cases involving professional programmes, students may have access to external professional body appeal or review processes in accordance with PSRB requirements.

In exceptional circumstances, students may seek judicial review if they believe a decision was unlawful.

Reconsideration of Concluded Decisions

The University upholds the principle of finality and certainty in casework decisions. Once a decision is reached and internal review and appeal opportunities are exhausted, that decision is normally final.

However, the University recognises that in exceptional circumstances, new evidence may later emerge that casts substantial doubt on the correctness or fairness of the original outcome. In such cases, the University may, at its discretion and under strict criteria as set out in the Reconsideration of Concluded Student Casework Decisions (New Evidence) Procedure, reconsider the case outcome to ensure natural justice and the safety and integrity of the University community.

Legal and Regulatory Alignment

This Policy is designed to ensure compliance with:

- Equality Act 2010 and the Public Sector Equality Duty
- Higher Education (Freedom of Speech) Act 2023
- Safeguarding frameworks
- Data protection legislation
- Common law duties as a reasonably competent higher education institution
- Office of the Independent Adjudicator (OIA) Good Practice Framework
- Office for Students (OfS) Conditions of Registration

7. Records, Confidentiality, and Data Protection

Record-Keeping

The University will retain records of fitness to practice matters in accordance with data protection law and University records management policies, including retention schedules.

Records are kept securely and used for institutional purposes including monitoring, compliance oversight, internal reporting, and responding to appeals or external reviews.

Confidentiality and Information Sharing

Information will be handled sensitively and shared only where necessary to:

- Ensure procedural fairness
- Protect individuals or the wider University community
- Comply with legal or regulatory obligations

Confidentiality will be balanced against safeguarding duties, public interest considerations, and regulatory requirements.

Data Subject Rights

Students have the right under data protection law to request access to their personal data, including fitness to practice records.

The University will handle subject access requests in compliance with UK GDPR and Data Protection Act 2018, balancing the student's rights with the privacy of witnesses and others, and complying with legal exemptions where applicable.

External Reporting and Disclosure

Where required by PSRB rules, placement agreements, or law, the University may be required to report concerns, outcomes, or decisions to external bodies. Disclosure may occur from a case at any stage of this Policy depending on PSRB requirements.

Students will normally be informed where such reporting occurs unless prohibited by law or where doing so would create a safeguarding risk.

Reporting may occur even if a student withdraws before proceedings conclude, where PSRB requirements or public protection considerations make this necessary.

References

The University regularly provides student references to third parties. When providing references in a professionally-related context for students found to have breached this Policy, the University reserves the right, depending on the case circumstances, to disclose matters where legitimate and serious concerns exist about possible risks.

8. Governance, Ownership, Monitoring, and Review

Ownership and oversight

Document name:	Casework Panels
Version number:	26_09_01
Equality Analysis:	Yes
Approved by (committee and date):	LTSEC – June 2026
Effective from:	01 September 2026
Next review date:	June 2029
Senior Policy Owner:	Assistant Director (Learning Teaching and Student Experience)
Policy Author:	Head of Student Casework and Insight
Overseeing committee:	Learning Teaching and Student Experience Committee
Compliance measures:	Annual Casework Report External scrutiny via the OIA
Related policies, procedures and codes of practice:	• Student Conduct and Disciplinary Policy • Support to Study Policy • Fitness to Practice / Professional Suitability Policy • Behaviour, Health and Practice Panels Policy (Casework Panels) • Behaviour, Health and Practice Appeals Policy (including any Part B Reporting-Student Request for Review as approved)

	• Reporting, Risk Assessment and Precautionary Actions Policy • Case Outcomes and Sanctions Policy • Return to Study Policy • Master Definitions Document (BHP definitions) • Policy Governance Framework (the umbrella governance instrument for UWE policies) • Complaints Policy and Procedure for Students; Complaints Policy for Non-Students; and, once approved, the Policy on Reportable Complaint Outcomes to the Office for Students • Academic Appeals Policy, as the distinct route for challenges to academic judgment • Freedom of Speech Policy and Code of Practice (currently v1.4, November 2025) • Dignity at Work and Study Policy and the University's Anti-Racism Strategy commitments • Statement of Expectations and Duty of Care Framework • Safeguarding arrangements and the University's Prevent duty response • Data Protection Policy, Records Retention Schedule, and the Advocate CMS Data Protection Impact Assessment • Academic Regulations and Student Terms and Conditions (as the contractual context within which this Framework operates)
Related legislative and/or regulatory requirements	• Office for Students regulatory framework and ongoing conditions of registration • Statutory external student complaints scheme • Equality Act 2010, • Higher Education (Freedom of Speech) Act 2023, • Higher Education (Freedom of Speech) Act 2023, • UK GDPR, Data Protection Act 2018 and Data (Use and Access) Act 2025 • Consumer Rights Act 2015 • Digital Markets, Competition and Consumers Act 2024 • Higher Education and Research Act 2017

	• Prevent duty • Children Acts 1989 and 2004, • Care Act 2014 • Protection from Harassment Act 1997 • UKVI Student Sponsor Guidance • PSRB standards and reporting duties
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9. Version history

Version	Date	Summary of changes	Author
26_09_01		N/A - new	Head of Student Casework and Insight

10. Further advice and guidance

Further advice and guidance on the operation of this Framework is available from the Student Casework Team (studentcasework@uwe.ac.uk).

9. Schedules

The following Schedules form part of this Policy and should be read in conjunction with it:

Schedule 1: Professional Suitability / Fitness to Practice Categories

Category	Concern Type	Sub-type / Examples	Typical Handling Route	Escalation & Professional Suitability Notes
Academic & Professional Integrity	Academic Dishonesty with Professional Implications	e.g. Plagiarism, contract cheating, or falsification of academic work in professional contexts (e.g. patient case studies, teaching resources, legal submissions); fabrication or falsification of data in research, lab work, or clinical records; collusion on assessments designed to test individual professional competence	<i>Handled initially via academic misconduct procedure; referred to Professional Suitability panel if integrity concern is significant or repeated, or if the conduct raises questions about trustworthiness for professional practice</i>	Academic misconduct becomes a professional suitability matter when it demonstrates a lack of integrity or honesty that is incompatible with professional registration or practice. Regulators (e.g. GMC, NMC, HCPC, TRA) explicitly reference dishonesty as grounds for fitness to practice concern. Insight, remorse, and evidence of learning are central to outcomes. Serious or repeated dishonesty may result in removal from programme or suspension of placement , with possible external reporting to PSRBs or regulators where applicable. Minor first instances with strong remediation may result in developmental action

Category	Concern Type	Sub-type / Examples	Typical Handling Route	Escalation & Professional Suitability Notes
				plans or reflective practice requirements.
Academic & Professional Integrity	Research Misconduct	e.g. Fabrication or falsification of research data; plagiarism in research outputs; failure to follow ethical approval processes; misrepresentation of research findings; breaches of data protection or participant confidentiality in research contexts	<i>Formal investigation by research integrity lead or committee; referred to Professional Suitability panel where student is on a professional programme and the conduct raises fitness concerns</i>	Research misconduct on professional programmes raises serious questions about integrity, trustworthiness, and ethical judgment . Even isolated incidents may be incompatible with professional standards, particularly in healthcare, social care, and education contexts where research informs practice. Outcomes depend on severity, intent, and insight, and may include removal from research opportunities, suspension from placement, or programme withdrawal. External reporting to funders, PSRBs, or regulators may be required.
Dishonesty & Deception	Non-Academic Dishonesty	e.g. Providing false or misleading information in applications, references, or registration (including criminal convictions, fitness declarations, DBS status); forging or altering documents (medical certificates, placement	<i>Formal investigation by casework team or integrity panel; always referred to Professional Suitability panel due to the direct relevance to trustworthiness</i>	Dishonesty is a fundamental breach of professional standards across all regulated professions and is explicitly referenced in PSRB codes of conduct. It undermines public trust and may disqualify a

Category	Concern Type	Sub-type / Examples	Typical Handling Route	Escalation & Professional Suitability Notes
		sign-off sheets, professional references, insurance documents); misrepresentation to placement providers, service users, or regulatory bodies; impersonation or fraudulent use of identity (ID cards, professional registration numbers, electronic signatures)	<i>and professional registration requirements</i>	student from registration. Even single instances are treated as serious professional suitability concerns. Mitigation, context, and insight are considered, but outcomes often include suspension or termination of programme , particularly where dishonesty relates to admissions, criminal history, or placement participation. Cases may be reported externally to PSRBs, regulators, DBS, or placement partners. Remediation is typically not possible for serious or calculated dishonesty.
Dishonesty & Deception	Financial or Benefits Fraud	e.g. Dishonest claims for financial support, hardship funds, bursaries, or expenses; fraudulent claims for mitigating circumstances or extensions; misuse of disabled students' allowance or other support entitlements; providing false information to secure financial advantage	<i>Formal investigation by casework or finance team; referred to Professional Suitability panel if student is on a professional programme and dishonesty is material</i>	Financial dishonesty is a character and integrity concern relevant to professional suitability. It may indicate a propensity for dishonesty in professional contexts (e.g. claiming false expenses, misrepresenting client records). Outcomes depend on intent, planning, and value, but typically include repayment,

Category	Concern Type	Sub-type / Examples	Typical Handling Route	Escalation & Professional Suitability Notes
				formal sanctions, and professional suitability review . Serious fraud may result in suspension or removal and external reporting to police, PSRBs, or funding bodies.
Boundary Violations & Inappropriate Relationships	Breach of Professional Boundaries	e.g. Inappropriate personal or sexual relationships with service users, clients, pupils, patients, or vulnerable individuals during placement or practice; inappropriate communication (e.g. sharing personal contact details, social media interaction beyond professional norms); crossing emotional, physical, or digital boundaries inconsistent with professional codes	<i>Immediate referral to Professional Suitability panel; may involve precautionary suspension from placement pending investigation</i>	Boundary violations are a critical fitness to practice concern in all caring and public-facing professions. They demonstrate a failure to understand or respect professional role and power dynamics , which poses a direct risk to vulnerable individuals. Even conduct that does not constitute harassment or abuse may be incompatible with professional practice if boundaries are breached. Insight and understanding of the harm caused are central to assessment. Outcomes typically include removal from placement , mandatory training, or programme withdrawal . Serious violations (e.g. sexual or exploitative relationships) will

Category	Concern Type	Sub-type / Examples	Typical Handling Route	Escalation & Professional Suitability Notes
				result in immediate suspension and likely expulsion, with external reporting to placement providers, safeguarding leads, and PSRBs/regulators.
Boundary Violations & Inappropriate Relationships	Dual Relationships & Conflicts of Interest	e.g. Engaging in business or personal relationships with service users or their families that compromise professional objectivity; accepting gifts or favours beyond professional norms; failure to declare conflicts of interest	<i>Formal review by placement lead or Professional Suitability panel; local resolution possible if minor and disclosure is timely</i>	Dual relationships may compromise professional judgment, objectivity, and public trust . Students must understand the importance of declaring and managing conflicts. Minor or inadvertent breaches with immediate disclosure may be managed through reflection and supervision. Concealed or exploitative dual relationships are serious professional suitability concerns requiring panel consideration and possible removal from placement or programme .
Placement & Practice-Related Conduct	Unsafe or Incompetent Practice	e.g. Persistent failure to meet required clinical, teaching, or practice competencies despite support; repeated errors in judgment or decision-making that risk harm to service users; refusal	<i>Managed initially through placement supervision and support; escalated to Professional Suitability panel if concerns persist, if</i>	Competence concerns become fitness to practice matters when a student fails to respond to feedback, lacks insight, or poses a risk to others . Progression on professional

Category	Concern Type	Sub-type / Examples	Typical Handling Route	Escalation & Professional Suitability Notes
		to follow supervisor instructions or protocols; working beyond competence or scope of practice	<i>there is evidence of risk, or if insight is absent</i>	programmes requires both academic achievement and practice capability. Persistent unsafe practice, even without intent, may be incompatible with professional registration. Support, supervision, and remediation are prioritised initially (e.g. additional placement time, learning plans), but if concerns continue or escalate, outcomes may include suspension from placement, requirement to repeat placement, or withdrawal from programme . External reporting to PSRBs or placement providers may be necessary.
Placement & Practice-Related Conduct	Unprofessional Behaviour on Placement	e.g. Persistent lateness, absence without notification, or failure to meet attendance requirements; inappropriate dress or presentation; disrespectful or dismissive conduct towards service users, patients, pupils, colleagues, or supervisors; use of mobile phones or social media during practice; breaches of	<i>Initial management by placement supervisor or practice educator; referred to Professional Suitability panel if behaviour is serious, repeated, or demonstrates lack of insight</i>	Professional programmes require students to meet professional standards of conduct, attitude, and behaviour in practice settings. Minor issues (e.g. single late attendance, dress code reminder) are typically managed locally with feedback and reflection. Repeated or serious

Category	Concern Type	Sub-type / Examples	Typical Handling Route	Escalation & Professional Suitability Notes
		confidentiality (discussing cases inappropriately, sharing identifiable information)		unprofessional conduct, or conduct that demonstrates poor judgment, lack of respect, or failure to understand professional role , is escalated as a professional suitability concern. Outcomes depend on severity, pattern, and insight, and may include written warnings, reflective practice requirements, additional placement supervision, suspension from placement, or programme withdrawal . Breach of confidentiality is always treated as serious and may result in immediate suspension and external reporting.
Placement & Practice-Related Conduct	Failure to Comply with Placement or Professional Requirements	e.g. Failure to complete mandatory training (safeguarding, infection control, manual handling); non-compliance with DBS, occupational health, immunisation, or fitness declarations; refusal to undertake required assessments or competency checks; failure to	<i>Escalated to Professional Suitability panel if non-compliance is persistent or relates to statutory or regulatory requirements; may result in suspension from placement until requirements are met</i>	Compliance with mandatory requirements is a condition of participation in professional practice . Failure to comply prevents progression and may indicate a lack of commitment or understanding of professional responsibility. Students must be given clear opportunity and reasonable

Category	Concern Type	Sub-type / Examples	Typical Handling Route	Escalation & Professional Suitability Notes
		adhere to placement policies or codes of conduct		adjustments (where applicable) to meet requirements, but persistent refusal or non-engagement is treated as a fitness to practice concern . Outcomes may include suspension from placement or programme until compliance is achieved, or withdrawal if compliance is not possible or not achieved within a reasonable timeframe.
Criminal Conduct & Off-Campus Behaviour	Criminal Convictions or Charges	e.g. Convictions or charges for offences involving dishonesty, violence, sexual offences, drug offences, safeguarding concerns, or any conduct incompatible with professional registration; failure to disclose convictions, cautions, or pending charges as required by programme regulations or PSRB/regulatory body requirements	<i>Immediate referral to Professional Suitability panel; precautionary suspension may be applied by senior officer pending investigation or criminal proceedings; DBS and regulatory checks may be initiated</i>	Criminal conduct is a fundamental fitness to practice concern for all professional programmes. Many PSRBs and regulators have absolute bars or rebuttable presumptions against registration for certain offences (e.g. sexual offences, violence against vulnerable persons, dishonesty). Universities must consider the nature, seriousness, and relevance of the offence , the time elapsed, evidence of rehabilitation, and regulatory requirements . Students are

Category	Concern Type	Sub-type / Examples	Typical Handling Route	Escalation & Professional Suitability Notes
				typically suspended pending outcome of criminal proceedings to avoid prejudicing external processes. Outcomes depend on the offence and regulatory context, but may include immediate withdrawal from programme , particularly for safeguarding-related offences or dishonesty. Failure to disclose is itself a serious integrity concern and may result in withdrawal even where the underlying offence might have been manageable. External reporting to PSRBs, DBS, and placement providers is standard.
Criminal Conduct & Off-Campus Behaviour	Conduct Bringing the Profession into Disrepute	e.g. Public behaviour (on or off campus, including online) that is incompatible with professional values or that undermines public confidence in the profession; association with extremist or criminal organisations; public statements or actions demonstrating discriminatory,	<i>Formal investigation and referral to Professional Suitability panel; cases involving safeguarding or reputational risk may result in immediate precautionary measures</i>	Professional students are expected to uphold professional standards at all times , not only during placement. Conduct that brings the profession into disrepute—whether criminal, discriminatory, abusive, or otherwise incompatible with professional values—is a fitness

Category	Concern Type	Sub-type / Examples	Typical Handling Route	Escalation & Professional Suitability Notes
		abusive, or unprofessional attitudes		to practice concern. Social media and online conduct are within scope. Assessment focuses on risk to public, insight, and compatibility with professional registration . Outcomes may include reflective practice, behaviour contracts, suspension, or withdrawal , depending on severity and remediation potential. Serious cases (e.g. hate crime, violence, extremism) typically result in immediate suspension and programme withdrawal , with external reporting.
Discrimination, Harassment & Bullying	Harassment, Bullying, or Discrimination (including online)	e.g. Targeting individuals on the basis of protected characteristics (race, sex, disability, religion, sexual orientation, gender reassignment, age, pregnancy/maternity); creating a hostile, intimidating, or offensive environment for peers, staff, or service users; cyberbullying, abusive social media conduct, or sharing discriminatory content;	<i>Formal investigation under harassment/dignity policy or student conduct procedures; always referred to Professional Suitability panel for students on professional programmes due to incompatibility with professional values and equality obligations</i>	Harassment, bullying, and discrimination are incompatible with all professional codes of conduct and breach legal obligations under the Equality Act 2010. They demonstrate a fundamental failure to respect dignity, diversity, and human rights, which are core professional values in healthcare, education, social

Category	Concern Type	Sub-type / Examples	Typical Handling Route	Escalation & Professional Suitability Notes
		stalking or persistent unwanted contact		work, law, and other public-facing professions. Even single serious incidents may result in suspension or removal from programme. Insight, remorse, and understanding of harm caused are critical to assessment, but remediation is often not possible for serious or repeated conduct. Cases involving service users, vulnerable individuals, or safeguarding concerns are treated with the highest seriousness and typically result in immediate suspension and programme withdrawal , with external reporting to placement providers, PSRBs, and (where applicable) police. Online conduct is treated as equivalent to in-person conduct.
Sexual Misconduct	Sexual Harassment, Violence, or Abuse	e.g. Unwanted sexual comments, conduct, or physical contact; stalking with sexual motivation; sexual assault, rape, or other sexual offences; sharing intimate images without consent; sexual	<i>Immediate referral to specialist investigation team and Professional Suitability panel; precautionary suspension applied by senior officer</i>	Sexual misconduct is a critical fitness to practice concern and is incompatible with professional registration in all contexts. It is always treated as serious misconduct under OfS

Category	Concern Type	Sub-type / Examples	Typical Handling Route	Escalation & Professional Suitability Notes
		misconduct towards service users, pupils, patients, or vulnerable individuals	<i>pending investigation; liaison with police and external safeguarding agencies as appropriate</i>	Condition E6 and institutional policies. Conduct towards service users or vulnerable individuals is treated as the most serious category and will result in immediate suspension and programme withdrawal , with external reporting to police, PSRBs, safeguarding authorities, and placement providers. Sexual misconduct towards peers or others is also a fitness to practice concern due to the fundamental breach of respect, consent, and professional boundaries . Outcomes typically include expulsion and reporting to relevant external bodies. Interim measures (no-contact orders, exclusion from campus/placement) are standard. Criminal and internal investigations may run in parallel.
Substance Misuse	Drug or Alcohol Misuse Impacting	e.g. Use, possession, or supply of illegal drugs; alcohol or substance misuse affecting attendance,	<i>Referral to Professional Suitability panel where conduct raises fitness</i>	Substance misuse is a professional suitability concern when it affects safe practice ,

Category	Concern Type	Sub-type / Examples	Typical Handling Route	Escalation & Professional Suitability Notes
	Professional Suitability	performance, or behaviour on placement or in professional contexts; attending placement or practice under the influence of alcohol or drugs; conviction for drug-related offences	<i>concerns or affects placement; health and wellbeing assessment may be required; precautionary suspension from placement may be applied pending outcome</i>	professional judgment, or public trust , or when it results in criminal conduct or placement disruption. Many PSRBs and regulators have explicit policies on substance misuse and fitness to practice. Context and insight are critical: evidence of dependency or health issues may result in supportive measures (e.g. referral to occupational health, substance misuse services, fitness to study procedures) alongside or instead of disciplinary action . However, students must demonstrate ability to practice safely and meet professional standards. Supply or dealing of drugs is always treated as serious misconduct incompatible with professional registration and typically results in suspension and programme withdrawal , with external reporting. Persistent misuse or failure to engage with support may result

Category	Concern Type	Sub-type / Examples	Typical Handling Route	Escalation & Professional Suitability Notes
				in withdrawal on fitness to practice grounds .
Health-Related Concerns Affecting Safe Practice	Physical or Mental Health Concerns Impacting Fitness to Practise	e.g. Health condition (physical or mental) that affects ability to meet programme requirements, attend placement safely, or practice competently; behaviour suggesting lack of capacity to engage safely with professional practice (e.g. self-harm risks, acute mental health crisis, cognitive impairment); non-engagement with reasonable adjustments or recommended support; failure to disclose health conditions that may affect safe practice	<i>Managed via Fitness to Study or Occupational Health assessment in first instance; referred to Professional Suitability panel if health concerns cannot be managed via reasonable adjustments and pose ongoing risk to self, others, or professional practice</i>	Health-related concerns are not misconduct but may raise professional suitability questions when they affect safe practice or ability to meet professional standards . Universities have a duty to support students and make reasonable adjustments under the Equality Act 2010, but also a duty to ensure public protection and safe practice. Fitness to study processes are used initially to assess support needs and capacity to continue. Where health concerns persist or cannot be managed safely, or where a student lacks insight or refuses to engage with support , the case may be referred to a Professional Suitability panel to consider whether continuation on a professional programme is appropriate. Outcomes may include temporary suspension to allow treatment or recovery ,

Category	Concern Type	Sub-type / Examples	Typical Handling Route	Escalation & Professional Suitability Notes
				requirement to complete occupational health clearance, adjusted practice or placement arrangements , or (in serious cases where safe practice cannot be assured) withdrawal from programme . These decisions are made on a case-by-case basis with medical and professional input, and are subject to procedural fairness and appeals. External reporting to PSRBs or regulators is not automatic but may be required in some cases.
Lack of Insight, Remediation, or Professional Development	Persistent Failure to Demonstrate Insight or Professional Development	e.g. Repeated minor unprofessional conduct without evidence of learning or behaviour change; failure to engage with reflective practice, feedback, or development plans; dismissive or defensive responses to concerns; absence of remorse or understanding of impact on others; pattern of behaviour suggesting unsuitability for professional role	<i>Escalated to Professional Suitability panel where pattern is established and local interventions have been exhausted; may follow earlier warnings, action plans, or placement supervision</i>	Professional suitability is not solely about isolated incidents but also about capacity for professional development, self-awareness, and learning from experience . Students who repeatedly demonstrate lack of insight, failure to respond to feedback, or patterns of unprofessional conduct (even if individually minor) may be found unsuitable for progression. Insight and

Category	Concern Type	Sub-type / Examples	Typical Handling Route	Escalation & Professional Suitability Notes
				remediation are key protective factors: students who demonstrate genuine reflection, learning, and behaviour change are more likely to be supported to continue. Persistent lack of insight, particularly after formal interventions, is a serious fitness to practice concern and may result in programme withdrawal even where individual incidents would not, in isolation, warrant that outcome. This category recognises that professionalism is developmental but that students must engage with that development.
Fitness to Practise (General)	Aggregate or Cumulative Concerns	e.g. Multiple separate concerns (academic integrity, unprofessional conduct, boundary issues, attendance, etc.) that, taken together, raise questions about overall professional suitability; pattern of behaviour across different contexts (academic, placement, social) that	<i>Referral to Professional Suitability panel to consider the totality of conduct and whether the student meets the standards required for professional registration and practice</i>	Professional suitability assessment may consider the cumulative weight of multiple concerns , even where no single incident would, in isolation, warrant withdrawal. A pattern of poor judgment, repeated unprofessional conduct, or failure to meet standards across multiple domains may

Category	Concern Type	Sub-type / Examples	Typical Handling Route	Escalation & Professional Suitability Notes
		suggests unsuitability for professional practice		indicate that a student is not suited to a professional role. Panels will consider the totality of evidence, the student's response and development over time, and the level of risk or concern. Outcomes depend on the individual case but may include intensive support and monitoring, extended placement supervision, or programme withdrawal where concerns are serious and persistent. This approach aligns with OIA good practice on holistic and fair decision-making.

Schedule 1: Definitions

This Policy uses terms that have specific meanings within the Behaviour, Health and Practice framework. Details can be found in the Framework for Student Behaviour, Health and Practice

Schedule 3: Precautionary Actions

The criteria, scope, procedures, decision-making authority, review mechanisms, and students' rights in relation to precautionary actions are set out in full in the **Reporting and Precautionary Actions Policy**.

Precautionary actions may be informed by PSRB requirements and public protection considerations.

Schedule 4: Case Panels

The composition, procedures, terms of reference, authority, and decision-making protocols for fitness to practice panels are set out in full in the **Behaviour, Health and Practice Panels Policy**.

Panels may include external professional representatives and operate in accordance with relevant PSRB requirements.

Schedule 5: Appeals

The grounds, procedural requirements, timescales, submission process, scope of review, composition of appeal panels, and outcomes available on appeal are fully set out in the **Behaviour, Health and Practice Appeals Policy**.

Schedule 6: Outcomes

The range of available outcomes, criteria and principles governing their imposition, authority to impose outcomes, review and compliance arrangements, and implications of non-compliance are set out below.

Outcomes may include requirements to meet professional standards, referral to or notification of PSRBs, and conditions necessary to protect the public.

Outcomes and Sanctions Matrix

This matrix provides a comprehensive ladder of potential outcomes and sanctions, starting from the least restrictive and escalating to the most serious (permanent expulsion with no right to return). It is applicable across all three frameworks, with framework-specific notes and language provided where necessary.

The matrix is indicative and non-exhaustive. Decision-makers retain discretion to apply outcomes individually or in combination, and to tailor outcomes to the specific circumstances of each case.

Level	Outcome/Sanction Type	Description and Examples	Fitness to Practice	Duration / Notes
0	No further action / Not proven / Case closed	Allegation not proven on the balance of probabilities (Conduct/FtP); or assessment determines no formal outcome necessary (Support to Study); or outcome not proportionate.	✓	N/A
1	Informal resolution / No formal sanction	Matter resolved informally (e.g., through mediation, coaching, conversation, signposting to support). No formal finding or sanction recorded.	✓	N/A
2	Verbal warning / Expectations reminder	Oral reminder of expected standards and behaviours. May be delivered by senior staff, personal tutor, or case officer. Not recorded as a formal sanction.	✓	N/A
3	Written warning (Level 1)	Formal written warning confirming breach/concern and setting out expected future conduct. Remains on record for a defined period (e.g., remainder of studies or up to 12 months).	✓	Typically 12 months or remainder of registration
4	Acceptable Behaviour Contract / Action Plan	Written agreement setting out expectations, support arrangements, and review milestones.	✓ (Professional Development Plan)	Typically 3-12 months with regular review

Level	Outcome/Sanction Type	Description and Examples	Fitness to Practice	Duration / Notes
		Used to support behaviour change and monitor progress.		
5	Formal reprimand	Formal written reprimand marking seriousness of breach. Remains on student record for a defined period.	✓	Typically remainder of studies
6	Apology	Requirement to provide a written or (where appropriate and agreed) verbal apology to affected individual(s). Only where appropriate and safe; never mandated in harassment/sexual misconduct cases without victim consent.	✓	One-off requirement
7	Confiscation of items	Confiscation of prohibited or dangerous items (e.g., drugs, weapons, unsafe equipment) for safety or compliance reasons.	✓	Permanent or time-limited
8	Attendance on educative/reflective programme	Requirement to complete training, workshop, or programme (e.g., consent education, professional ethics, substance awareness). Cost may be borne by the student where proportionate.	✓	Cost and duration specified; completion required
9	Restorative justice / Restorative practice	Facilitated process aimed at repairing harm and relationships through dialogue (direct or indirect). Only available: - Where both/all parties consent. - In harassment/sexual misconduct cases, only where explicitly requested by the reporting student and assessed as safe and appropriate. - Never appropriate as sole outcome in serious sexual misconduct cases.	✓ (optional)	Victim-led; trauma-informed facilitation required
10	Short-term access restriction	Temporary restriction from specific facilities, buildings, or areas of campus (e.g., library, gym, specific building).	✓	Up to 7 days

Level	Outcome/Sanction Type	Description and Examples	Fitness to Practice	Duration / Notes
11	Time-limited access restriction	Restriction from specific facilities, services, or campus areas for a defined period (e.g., up to one academic term).	✓	Up to one term
12	IT or system restrictions	Restriction or suspension of access to IT systems, networks, or online platforms where misuse has occurred.	✓	Time-limited or until conditions met
13	Non-contact arrangement	Formal requirement that the student has no contact (direct or indirect, including via social media or third parties) with specified individual(s). Essential in harassment/sexual misconduct cases.	✓	Duration specified; breach is serious escalation
14	Exclusion from specific activities or events	Prohibition from attending or participating in specific activities, events, trips, placements, or extracurricular activities.	✓	Time-limited or permanent
15	Reparation / Restitution	Requirement to pay compensation or make good loss or damage caused to the University or an individual. Amount must be calculated and justified.	✓ use cautiously	Must specify: loss, calculation, payment timeline
16	Financial penalty (fine)	Monetary penalty up to £1,000 (or maximum determined by Directorate). Used sparingly; exists partly as deterrent. Revenue to Student Hardship Fund. Non-payment treated as University debt. Must record: why fine necessary, why non-financial sanction insufficient, proportionality considering hardship.	✓ use cautiously; (typically only for non-clinical breaches)	Up to £1,000
17	Suspension from specific placement, module, or activity	Temporary or permanent removal from a placement, practice setting, module, or	✓	Time-limited or permanent

Level	Outcome/Sanction Type	Description and Examples	Fitness to Practice	Duration / Notes
		clinical/professional activity where fitness, conduct, or risk concerns arise.		
18	Suspension from University (time-limited)	Temporary exclusion from the University (all or specified parts of campus, activities, and teaching) for a defined period. Used where serious breach or risk requires temporary removal. Student remains registered but cannot attend.	✓	Specified period (e.g., one term, one academic year)
19	Mandatory interruption of studies / Withdrawal from registration (time-limited)	Requirement to interrupt studies and withdraw from registration for a defined period. Used in Support to Study cases where student needs time away to address health, wellbeing, or capacity concerns; also available in Conduct/FtP for serious cases. Conditions for return must be specified.	✓ (termed "interruption" or "temporary exclusion")	Time-limited; conditions for return specified
20	Expulsion from one course with permission to register on another (non-qualifying) course	Permanent removal from a specific course (e.g., a professional, clinical, or qualifying programme) due to fitness to practise or conduct concerns, but permission granted to register on a different (typically non-professional/non-qualifying) course at the University.	✓	Permanent exclusion from named course; eligibility for alternative course specified
21	Exclusion from a course or profession (with possible re-entry elsewhere)	Permanent exclusion from a specific professional programme, course, or field of study (e.g., healthcare, teaching, social work) at this University, due to fitness to practise or serious conduct breach. Student may be eligible to apply to another institution or for a different course/profession, depending on circumstances.	✓	Permanent exclusion from specified course/programme; portability to other institutions not guaranteed but not prohibited

Level	Outcome/Sanction Type	Description and Examples	Fitness to Practice	Duration / Notes
22	Time-limited expulsion (with possible re-entry after review)	Expulsion from the University for a defined period (e.g., 1-3 years), after which the student may apply for readmission, subject to meeting specified conditions and demonstrating changed circumstances, insight, and fitness to return. Registration is terminated.	✓	Time-limited (specify period); conditions for re-entry application clearly set out
23	Permanent expulsion (with no right to return)	Permanent termination of registration and expulsion from the University with no right to return at any time. Reserved for the most serious cases where: - The conduct or risk is so serious that the student cannot safely or appropriately remain part of the University community. - There is no realistic prospect of safe return or fitness to study. - Lesser sanctions are insufficient to protect individuals or the University.	✓ (most serious cases only)	Permanent; no re-entry possible

Framework-Specific Notes on the Matrix

- Outcomes must always consider professional body standards and the protection of patients, service users, and the public.
- **Level 20** (expulsion from one course with permission to register on a non-qualifying course) is particularly relevant where a student is unfit for a professional programme but may succeed on a non-clinical or non-regulated course.
- **Level 21** (exclusion from a course or profession) ensures students who cannot meet professional standards are removed from that pathway but are not necessarily barred from all study.
- **Permanent expulsion** (Level 23) should be reserved for cases involving serious professional misconduct, safeguarding breaches, or irretrievable loss of fitness to practise.

Escalation Thresholds and Aggravating Factors

When to Escalate

Decision-makers should escalate to a higher level of outcome where **one or more** of the following escalation thresholds are present:

Escalation Threshold	Description	Examples
Significant harm or impact	Serious harm (physical, psychological, emotional, financial, academic, or reputational) caused to individuals or the community.	Assault; sustained harassment; serious distress; significant financial loss; damage to professional reputation or public trust.
Repeat or persistent behaviour	Previous findings, warnings, or outcomes; pattern of behaviour despite earlier interventions.	Breach of Acceptable Behaviour Contract; repeat harassment after warning; multiple incidents.
Deliberate intent or premeditation	Behaviour was planned, calculated, or deliberate rather than reckless or negligent.	Premeditated harassment; planned cheating; deliberate breach of restrictions.
Misuse of power or position	Exploitation of authority, trust, or positional advantage.	Staff-student relationship misconduct; abuse of peer mentor or representative role.
Criminality indicators	Behaviour has criminal characteristics or has resulted in police involvement or conviction. (Note: University determines code breaches, not criminal guilt.)	Assault; theft; fraud; hate crime; sexual offences; drug supply.
Safeguarding or serious risk	Significant risk to vulnerable individuals, children, or others requiring protective action.	Risk to placement patients/service users; safeguarding concerns; threat of violence.
Lack of insight or engagement	Student shows no understanding of impact, refuses to engage, or denies responsibility despite evidence.	Refusal to attend meetings; denial despite clear evidence; blame-shifting; lack of remorse.
Breach of previous outcome or restriction	Non-compliance with earlier sanction, contract, or protective measure.	Contact with individual despite non-contact order; failure to complete required training; breach of exclusion.

Decision Factors: What Panels and Decision-Makers Must Consider

Mandatory Considerations

In determining outcomes, decision-makers must consider and record (briefly, in the written rationale) the following factors:

a) Nature and seriousness of the behaviour or concern

What standard, policy, or professional requirement was breached? How serious is the breach in context?

b) Impact and harm caused

What harm was caused to individuals (including the reporting party), the community, the University, or (in Fitness to Practise cases) patients or the public? Consider physical, psychological, emotional, financial, academic, and reputational harm.

c) Intent and degree of responsibility

Was the behaviour deliberate, reckless, negligent, or unintentional? Was there premeditation or misuse of power?

d) Pattern, persistence, and compliance

Is this a first incident or part of a pattern? Has the student complied with earlier outcomes, support plans, or restrictions? Is there evidence of repeat behaviour despite interventions?

e) Risk and protection needs

What is the current level of risk to the student, others, or the University? Are restrictions, non-contact arrangements, or removal necessary to manage risk?

f) Engagement, insight, and likelihood of change

Has the student cooperated with the process? Do they demonstrate understanding, acceptance of responsibility, and insight into the impact of their behaviour? Is there evidence of learning or genuine commitment to change?

g) Mitigating circumstances

Are there relevant, evidenced mitigating factors (e.g., health conditions, personal circumstances, first offence)? Mitigation affects the severity of the sanction, not the standard of proof or the finding itself.

h) Consistency with previous cases

Have similar cases resulted in similar outcomes? Decision-makers should consider (but are not bound by) outcomes in comparable cases to promote consistency, whilst recognising that each case turns on its own facts.

Special Considerations: Trauma-Informed and Victim-Led Practice in Harassment and Sexual Misconduct Cases

Principles

Cases involving harassment, sexual harassment, sexual misconduct, sexual violence, hate crime, or discriminatory abuse require trauma-informed, victim-led approaches that:

- Prioritise the safety, autonomy, and wellbeing of the reporting student.
- Recognise the impact of trauma on memory, engagement, and participation.
- Avoid secondary harm through insensitive processes or assumptions.
- Respect the reporting student's choices about process, outcomes, and engagement (within the bounds of the University's duty to protect the community).

Restorative Justice and Informal Outcomes

Restorative justice, mediation, or informal resolution must not be offered, suggested, or pursued in cases of serious harassment, sexual harassment, sexual misconduct, or sexual violence unless:

- Explicitly requested by the reporting student, and
- Assessed by appropriately trained staff as safe, appropriate, and in the reporting student's interests, and
- Facilitated by a trauma-informed practitioner with specialist training.

Even where requested, restorative justice must never be the sole outcome in serious sexual misconduct cases. It may only be used alongside formal sanctions or protective measures.

Anonymous and Third-Party Reporting

Where incidents are reported anonymously or by third parties:

- The University retains a duty to assess and respond to risk.
- Protective measures (e.g., restrictions, non-contact arrangements, referral to Fitness to Practise or Support to Study) may be necessary even without a formal complaint.
- Outcomes must be proportionate to the information available and the level of risk identified.

- The University will not pursue disciplinary action solely on the basis of anonymous reports where there is insufficient evidence to meet the balance of probabilities, but may take precautionary or risk-management action where appropriate.

Financial Outcomes: Fines and Reparation

Reparation and Restitution

Reparation may be required where misconduct has caused quantifiable loss or damage to the University or an individual (e.g., damaged property, theft, costs incurred).

Recording requirements:

- Specify the loss or damage being repaired.
- Show how the amount is calculated.
- Set a clear payment timeline.

Fines (Financial Penalties)

Fines up to £1,000 (or a maximum set by the Directorate) may be imposed in Conduct and (sparingly) Fitness to Practise cases.

Principles:

- The University recognises student financial hardship.
- Fines should not be used regularly; they exist partly as a deterrent.
- Revenue from fines is added to the Student Hardship Fund.
- Non-payment is treated as a debt to the University.

Recording requirements: Decision-makers imposing a fine must record:

- Why a fine is necessary (e.g., to mark seriousness, deter similar conduct).
- Why a non-financial sanction alone is insufficient.
- Where both fine and restitution are imposed, why the combined financial impact is proportionate (avoid double-counting).

3 Support to Study: No Financial Outcomes

Fines and financial penalties are not available in Support to Study cases, as these are not disciplinary proceedings.

Recording Decisions: Minimum Requirements

1 Written Rationale

All outcome decisions must be accompanied by a written rationale (in the decision record, panel minutes, or outcome letter) that includes:

a) Findings

- What was proven or not proven (Conduct/Fitness to Practise), on the balance of probabilities.
- What concerns were established (Support to Study).

b) Starting point

- What level of the matrix was considered first, and why.

c) Key factors considered

- Brief commentary on each of the decision factors (section 7) relevant to the case.

d) Outcome(s) chosen and why proportionate

- What outcome(s) have been imposed.
- Why a lower outcome is insufficient (where escalation has occurred).
- How the chosen outcome is proportionate to the behaviour, impact, risk, and circumstances.

e) Financial outcomes (if any)

- Calculation and basis for restitution.
- Amount of fine ($\leq$ £1,000), and rationale for why necessary and proportionate, with reference to deterrence, hardship fund, and debt treatment principles.

f) Duration, conditions, monitoring, and consequences of breach

- What the student must do or not do.
- How long the outcome applies.
- How compliance will be monitored.
- What will happen if the outcome is breached (e.g., escalation, further proceedings).

g) Communication and appeal

- Confirmation that the outcome letter includes reasons and details of the appeal route, grounds, and deadline (where applicable).

2 Clarity and Workability

Outcomes must be clear, specific, and workable. Vague or unenforceable outcomes undermine fairness and protection. Where conditions or restrictions are imposed, they must be sufficiently detailed to enable compliance and monitoring.

Framework-Specific Guidance: Applying the Policy in Practice

Purpose

Fitness to Practise outcomes are protective and developmental. They ensure students meet the professional, ethical, and health standards required for safe and effective practice, and they protect patients, service users, and the public. Outcomes must align with professional body requirements.

Typical case types and indicative outcome ranges

Fitness to Practise Concern	Examples	Low-Level Range (Minor / First Incident / Remediable)	Mid-Level Range (Moderate / Concerning Pattern / Some Risk)	High-Level Range (Serious / Persistent / Safeguarding Risk / Irretrievable)
Professional conduct breach	Breach of professional code or ethics; inappropriate boundaries; minor dishonesty.	Levels 3-8 (warning, professional development plan, reflective training)	Levels 11-17 (restrictions, exclusion from specific placements)	Levels 20-23 (course exclusion, time-limited or permanent expulsion)
Clinical or practice competence concerns	Unsafe practice; inadequate skill or knowledge for stage; failure to meet placement requirements.	Levels 4-8 (action plan, additional supervision, targeted training)	Levels 17-19 (suspension from placement; interruption with conditions for return)	Levels 20-23 (exclusion from professional programme; may permit transfer to non-clinical course)
Health or wellbeing impacting fitness	Physical or mental health condition affecting safe practice; lack of insight into limitations.	Levels 4-19 (action plan, adjustments, supported interruption with return conditions)	Levels 19-21 (mandatory interruption; exclusion from course with possible re-entry elsewhere if health improves)	Levels 22-23 (permanent exclusion where unfitness is irretrievable or risk unmanageable)
Dishonesty or integrity breach	Falsifying records; plagiarism in practice; misleading patients/service users.	Levels 5-9 (reprimand, reflective training,	Levels 11-17 (restrictions, suspension from	Levels 20-23 (course/profession exclusion, time-limited or permanent expulsion)

		restorative where appropriate)	placement, external referral)	
Safeguarding breach or serious misconduct	Harm to vulnerable person; sexual misconduct with patient/service user; conviction for relevant offence.	Not applicable (immediate escalation)	Levels 17-19 (suspension pending full assessment; external referral)	Levels 21-23 (permanent exclusion from course/profession or University; mandatory where serious safeguarding risk)

Key principles

- Outcomes must prioritise public protection and professional standards.
- **Level 20** (expulsion from one course with permission to register on a non-qualifying course) is a key intermediate option where a student cannot meet professional standards but may succeed elsewhere.
- **Level 21** (exclusion from course/profession with possible re-entry elsewhere) allows students to leave this institution but potentially re-enter the profession elsewhere if circumstances change.
- **Level 23** (permanent expulsion) should be reserved for cases involving serious professional misconduct, irretrievable unfitness, or safeguarding concerns where public protection demands permanent removal.

Combining Outcomes

Outcomes may be applied individually or in combination where this is proportionate and necessary to achieve the aims of protection, learning, risk management, and (where relevant) marking seriousness.

Common Combinations (Examples)

Combination	Rationale	Frameworks
Written warning + educative programme + non-contact arrangement	Marks seriousness, promotes learning, and protects affected individual.	Conduct, Fitness to Practice
Restitution + fine	Repairs loss and marks seriousness/deters similar conduct. Must justify why both needed.	Conduct
Suspension from placement + action plan + return conditions	Protects patients/service users whilst enabling student to demonstrate improved fitness.	Fitness to Practice
Action plan + access restrictions + non-contact arrangement	Provides support and structure whilst managing risk to others.	Support to Study
Time-limited expulsion + conditions for return application	Marks extreme seriousness but recognises possibility of change and rehabilitation.	Conduct, Fitness to Practice

Schedule 6: Return to Study

The principles, criteria, processes, and decision-making arrangements governing when and how a student may resume study following interruption or restriction are set out in the Return to Study Policy.

Return to study decisions may take account of professional standards, placement requirements, and PSRB expectations.

Schedule 7: Professional, Statutory and Regulatory Body (PSRB) and Alternative Regulatory Body (ARB) Programmes within Scope

Purpose and Application

This Schedule sets out the criteria for determining which programmes fall within the scope of the Fitness to Practise Policy and identifies governance responsibilities for maintaining, reviewing, and updating the list of designated programmes.

Criteria for Designation

A programme is within scope of this Policy where it meets one or more of the following criteria:

1. The programme leads directly to professional registration, authorisation to practice, or professional accreditation with a PSRB or ARB
2. The programme involves placements or professional practice where students have direct responsibility for, or interaction with, patients, clients, service users, pupils, or members of the public in contexts where professional standards of conduct, health, and character apply
3. The programme is subject to PSRB or ARB requirements relating to:
 - Conduct and professional behaviour
 - Good character
 - Health and fitness to practice
 - Safeguarding or public protection
 - Reporting obligations regarding students' suitability for professional practice

Programmes in Scope

A detailed list of all programmes covered by this policy can be found on the Casework Website