



FITNESS TO PRACTISE (TRAIN) POLICY AND PROCEDURE

SCHOOL OF HEALTH & MEDICAL SCIENCES



Scope:

This Policy and Procedure is intended for the management of students' and applicants' fitness to practise (train) concerns. The Policy is designed to inform students, staff and practice providers about the policy and procedure for addressing fitness to practise (train) issues.

The Policy covers awards, progression and registration and applies to programmes leading to professional qualification and/or eligibility to apply to a professional register which requires students to undertake periods of experience in practice settings. The University, in conjunction with the Professional, Statutory and Regulatory Bodies (PSRBs), has a duty to ensure students are fit to practise (train) during and up to the point of registration/awarding of qualification or academic credits.

Application of this Policy will be consistent with the University's Code of Practice on Freedom of Speech and Academic Freedom and with applicable law. Decisions under this Policy will not be based on, nor penalise, the lawful expression of views or participation in lawful debate, and will focus on conduct, competence and professional suitability in practice settings, subject to PSRB requirements and the University's safeguarding, public order and equality duties.

For programmes regulated by PSRBs, the Higher Education Institution is required to have a Fitness to Practise (Train) Policy and Procedure in place to manage fitness to practise (train).

Date approved/re-approved: April & August 2026

Date for review:

To be reviewed by the end of 2026/27 academic year (August 2027)

Effective from: 01 September 2026

To be read in conjunction with:

The Policy should be used in conjunction with the relevant PSRB code and standards and requirements, the University Senate Regulations 10 Support to Study, 13 Student Disciplinary, 14 Admission of Students and Occasional Students, 19 Assessment Regulations, Academic Integrity and Misconduct Policy and Guidance, Professionalism, Support, and Reflection Plan Framework, Disclosure and Barring Service Policy and Process, Raising and Escalating Concerns on Placement, Precautionary Suspension from Placement, and any other relevant policies and procedures as deemed necessary.

Equality and Diversity Statement

City St George's, University of London works to advance equity, diversity and inclusion in its activities, processes, and culture, for the whole University community, including staff, students and visitors. The University will meet its obligations under the Equality Act 2010 in its policies and seek to eliminate discrimination on the basis of age, disability, neurodiversity, sex, gender reassignment, gender identity, marital status, pregnancy, caring responsibilities, sexual orientation, race, nationality, ethnic origin, religion and belief and socio-economic background.

Where relevant to the policy, decision-making panels will endeavour a reasonable gender balance (with at least one man and one woman) and will actively consider representation of other protected groups.

Fitness to Practise (Train) Policy

Context

1. The Policy outlines its general principles and purpose and should be read in conjunction with the [Fitness to Practise \(Train\) Procedure](#) which sets out the process by which this Policy will be applied and accompanying guidance and policies.

Introduction

2. The purpose of the Fitness to Practise (Train) Policy and Procedure is
 - **Compliance:** To comply with the requirements of the appropriate PSRB through demonstration of clear responsibility and accountability for both the institution and student;
 - **Protection of public/patients/clients:** To safeguard the health and wellbeing of students, patients/clients and the public and to uphold the public's trust in the relevant healthcare profession;
 - **Professional Practice:** To ensure students are appropriately prepared by engaging fully with their programme of study (including placements) to enable entry to their chosen healthcare profession; have developed and continue to maintain good character (in terms of demonstrating professional attitudes and behaviour); and are of good health (in terms of being fit to provide care).
3. The Policy has been developed by the School of Health & Medical Sciences hereafter referred to as *the School* to review and assess fitness to practise (train) by considering the **character**, **conduct**, and **health** of applicants and students. This applies to admissions, progression, engagement and completion of programmes, ensuring continued eligibility to apply for registration with the relevant PSRB.
4. In this policy, any named officer, team, or department may delegate their responsibilities to another appropriate individual or unit. The procedure shall not be invalidated if a person, team, or department acts in place of another named in these regulations where circumstances make this expedient.

Definition

5. Fitness to Practise (Train) means that a student has the health, character, conduct, and professional competence necessary to:
 - Safely and effectively undertake their course of study;
 - Meet the standards expected by the relevant professional body;
 - And ultimately, enter the profession without posing a risk to the public, clients, or service users, or themselves, both during training and their future professional role.
6. Fitness to Practise (Train) is monitored and assessed throughout students' time on their programme and, if there are concerns including allegations of misconduct, lack of engagement/competence and/or poor health, these will be investigated and addressed by the School. The main purpose in doing this is to safeguard the health and wellbeing of students, members of the public, public confidence in the relevant healthcare profession and to adhere to the standards set out by PSRBs.
7. The School has a responsibility as a programme provider to ensure that all students meet the requirements for entry and continued maintenance on the programme leading up to registration with the relevant PSRB. Any investigation or action under this section will be undertaken consistently with the University's obligations to secure freedom of speech and academic freedom within the law.
8. The lawful expression of views or participation in academic debate, including opinions that others may strongly disagree with, will not in itself constitute misconduct or a fitness to practise (train) concern. Where a concern relates to speech or expression, the School will consider the applicable legal framework and relevant University policies and will focus on whether conduct breaches legal or professional standards.
9. The primary objective of this policy is not to penalise students. Instead, it focuses on ensuring the safety of students, their peers, and the public. It also aims to uphold the public's trust in the profession. Throughout the process, it is imperative to provide support to students, even if the conclusion determines that they cannot proceed with their studies.
10. The underpinning principles of this policy are: accessibility, clarity, proportionality, timeliness, fairness, independence, improving the student experience, whilst ensuring appropriate privacy and safeguarding responsibilities.

Burden of proof

11. In fitness to practise matters, it is on the university to show that the student breached the requirements of the university and/or relevant PSRB for professional behaviour. At the appeal stage, the responsibility rests with the student to demonstrate that one or more of the grounds for appeal have been met.

Standard of proof

12. The standard of proof applied is that of the balance of probability; that on the evidence put forward, it is more likely than not that something was or was not the case. The standard of proof remains constant; it does not operate on a sliding scale. The standard of proof does not change based on the seriousness of the allegation/s, potential consequences, or mitigating/aggravating circumstances.

Procedural exemptions

13. In exceptional circumstances it may be appropriate to amend this procedure, for example, where strict application of this would result in substantial unfairness to the student, or the student is in some way at risk because of health or disability. Such cases will be rare, and each will be treated on their own merits.

Third Party requests

14. Students are advised to respond to all communication from the University (verbal and written) directly and not through a third party except in exceptional circumstances where a diagnosed disability reasonably prevents them from being able to do so.

Application of this Policy

15. The School will at all times consider the most appropriate process to be followed when managing concerns about students' fitness to practise (train). Please refer to Appendix 1 for examples of areas of concern.
16. The School has a duty of care towards its students' health and wellbeing and will ensure it continues to provide support to students whilst undertaking their studies and through to the conclusion of the process. There is a dedicated team providing Health and Wellbeing to students, details of which can be found on the [Student Hub](#). Please also refer to City St George's [Senate Regulation 10 Support for Study](#).
17. The Policy is not intended to deal with students' academic performance, extenuating circumstances or complaints. However, if allegations of academic misconduct or disciplinary offence are raised during consideration under City St George's relevant procedure and/or, information or evidence raises questions about students' fitness to practise (train), those issues may be referred for consideration under this Policy.
18. For the avoidance of doubt, the lawful expression of views or participation in lawful debate will not, of itself, constitute academic misconduct, a disciplinary offence, or a fitness to practise (train) concern. Any such referral and any subsequent consideration will have due regard to the University's duties to secure freedom of speech and academic freedom within the law, including by cross-referring to the University's Code of Practice on Freedom of Speech and Academic Freedom where appropriate.

19. The Policy sets out stages to manage concerns about students' fitness to practise (train), such as a Professionalism, Support and Reflection Plan, to support students and ensure proportionate action plans address identified areas of concern. Any concern raised and any resulting actions will relate to conduct or competence relevant to professional standards and public protection and will not be initiated or escalated solely because a student has lawfully expressed opinions or ideas, even where these may be controversial or offensive.
20. Reflective and development activities will focus on professional responsibilities and safe practice and will not require a student to renounce or modify lawful beliefs. Where speech or behaviour is unlawful or breaches applicable professional codes (for example, harassment, incitement to violence, or unlawful disclosure of confidential information), it may form part of a fitness to practise (train) concern. Measures adopted under this Policy will be the least restrictive necessary to manage identified risks while enabling scholarly discussion and challenge in learning environments.
21. Students may be removed/suspended without notice from a placement environment (in accordance with the School's Precautionary Suspension of a Student from Placement Policy, or Senate Regulation 13 Student Discipline), where the student's behaviour:
 - a) gives rise to concerns regarding their fitness to practise (train);
 - b) poses a risk to themselves, members of the university community, the service users or the placement; where students are at risk, for example, due to their mental health; or to preserve the integrity of an investigation.
22. All students on a programme of study leading to eligibility to apply for registration with a PSRB will be required to sign a self-declaration of good health and good character at relevant intervals throughout the programme. This requirement will be monitored and recorded by programme staff and will be reported, where applicable at the relevant Assessment Board.
23. For the purposes of this requirement, 'good character' and 'good health' relate to professional conduct, integrity, and fitness to practise as defined by the relevant PSRB and applicable University regulations. Compliance will not be judged by a student's lawful opinions, lawful expression of views, or participation in lawful academic or extracurricular activity.
24. The School will ensure that accurate records of fitness to practise (train) proceedings are maintained and are shared with the student to allow for a fair and transparent process. Records can be called upon by future panels and external organisations (for example such as PSRBs, Office for Students (OfS), the Office of the Independent Adjudicator for Higher Education (OIA)) in relation to accreditation or student appeals.
25. City St George's retains the right to proceed with fitness to practise (train) proceedings even after a student has withdrawn from their course. This is:
 - To protect the public and uphold professional standards;

- To inform future references or disclosures to regulatory bodies;
 - To comply with the relevant PSRB;
 - To determine whether a student should be reported to the Disclosure and Barring Service (DBS), which can affect future eligibility to work in regulated professions.
26. Under the Medical Act (1983), the university is responsible for the education and training of doctors up to full registration, including both the undergraduate and foundation stages of education and training Foundation Year 1 (FY1). The Act also places a duty upon medical schools to ensure that those who graduate from undergraduate programmes and who subsequently complete their Foundation Year 1 (FY1) training are fit to practise.
27. In the case of a student who is already a Registrant with a Registration Body, the University may determine to take on the role of “reporting party” and lodge a complaint with a Registration Body.

Equality Act 2010, GDPR and Data Protection Act 2018, and Freedom of Information Act 2000

28. The Policy will be operated in accordance with the University’s duties under the Equality Act 2010, the Data Protection Act 2018, the Human Rights Act 1998, the Health and Safety at Work etc. Act 1974 (HSWA) and Freedom of Information Act 2000. Staff operating the Fitness to Practise (Train) Policy should refer to the Procedure and accompanying Guidance for further information about student confidentiality. Personal data and special category data is processed to comply with City St George’s public task, and in accordance with the Data Protection Act 2018.

The Office of the Independent Adjudicator for Higher Education (OIA)

29. The University subscribes to the OIA scheme. This policy has been developed in consultation with the "Good Practice Framework: Fitness to Practise." Consequently, this policy and its affiliated regulation are subject to the OIA's review.

Freedom of Speech

30. City St George’s, University of London, regards freedom of speech and academic freedom to be fundamental to delivering its mission as the University of business, practise and the professions. Its values in this respect are set out in a code of practice on freedom of speech and academic freedom, which explains how the University will uphold, secure, and promote freedom of speech within the law. Nothing in this policy should be interpreted in any way that would be inconsistent with the code of practice and – in the event of any inconsistency – the provisions of the code will prevail.

Disclaimer

31. The information in this Policy is correct at the time of review in August 2026. The School reserves the right to make amendments to the Policy, provided that any amendments are made in accordance with applicable law and regulatory duties and do not reduce protections for lawful freedom of speech or academic freedom. Amendments may be made where they are: (i) required by changes to Professional, Statutory and Regulatory Body regulations; (ii) required as a result of unforeseen events or circumstances beyond the University's control; or (iii) reasonably necessary for legitimate operational, legal, or regulatory reasons.
32. In the event that amendments are made, the University shall take reasonable steps to notify relevant parties as soon as is reasonably possible and, where changes materially affect the exercise of freedom of speech or academic freedom under this Policy, will apply the relevant governance and approval processes to ensure alignment with the University's Code of Practice on Freedom of Speech and Academic Freedom.

Fitness to Practise (Train) Procedure

The Procedure should be read in conjunction with the Fitness to Practise (Train) Policy, relevant University Regulations and accompanying PSRB standards and guidance.

Fitness to Practise (Train) – Professional, Statutory and Regulatory Bodies (PSRB) Code of Professional Conduct

33. PSRBs such as: the General and Medical Council (GMC), the Nursing and Midwifery Council (NMC), Health and Care Professions Council (HCPC), General Optical Council (GOC), and Association for Nutrition (AfN) have requirements that those registered with them are fit to practise (train) and meet nationally recognised proficiency standards which demonstrate that they have the skills, knowledge, good character and good health to do their job safely and effectively. The main objective of this requirement is to safeguard the health and wellbeing of the public.
34. For programmes regulated by PSRBs, there must be a clear and effective process to promptly address any academic or non-academic concerns about students, especially those related to professional standards. In the case of programmes which are regulated by PSRBs, it is a requirement to have a robust process in place to manage students' academic and non-academic concerns in relation to the relevant professional standards and in a timely manner, as well as a process to manage more serious concerns.
35. The School is required to monitor that all applicants meet the general entry requirements as part of the selection process, such as Disclosure and Barring Service (DBS) and Occupational Health checks. The School is also required to monitor the progress of all students and to take appropriate action if any issue relating to good health or good character arises.

Emergency Powers

36. The Executive Dean (or nominee) has the power to suspend students and refer them directly to a fitness to practise investigation if their case is deemed sufficiently serious or where the patient, client, public or student's own safety is compromised. In this case, students will be immediately suspended from placement pending the outcome of the investigation and a review meeting. In exceptional cases, students may be suspended from both the academic and practice element of the programme. This is to maintain public trust in the profession, protect public safety and wellbeing, and uphold professional standards and conduct.
37. Precautionary suspension from practice pending an investigation may be undertaken if a student is alleged to have contravened PSRB and/or University regulations and guidelines for conduct. For example, if an incident or complaint has occurred involving others and an investigation needs to be carried out.

Confidentiality and General Data Protection Regulations

38. The Procedure will be operated with due consideration to students' confidentiality. In fitness to practise (train) matters, the University limits access to sensitive personal information to those who require it to enable the student's professional behaviour to be established and/or who need it to support the student. The University collects and processes a variety of personal data in order to fulfil relevant student regulations and policies.
39. This personal data may be provided by the student or collected from other departments within the University or taken from publicly available sources such as social media. The University processes personal data for this purpose in its legitimate interests. Some Regulations will require the sharing of sensitive personal data (defined as "special category" data by data protection legislation).
40. The University processes and shares special category data in the substantial public interest and only where it is necessary to enable the University to fulfil its duties of care to the student, other students, or to safeguard third parties. More details on the types of data collected and how it is used to meet this need can be found in the Student Privacy Notice. City St George's, University of London's obligations of confidentiality shall not apply in relation to information which:
- is or becomes public knowledge other than as a result of a breach of confidentiality by City St George's, University of London;
 - is required to be disclosed under its PSRB requirements (e.g. the Nursing and Midwifery Council, Health and Care Professions Council, General Optical Council, General Medical Council);
 - is required to be disclosed by law;
 - is required in order to give proper instructions to any professional adviser who has an obligation to keep any such information confidential;
 - will impact on City St George's, University of London's duty of care to public and student safety, and to maintain public confidence in the relevant

healthcare profession.

Referral to Fitness to Practise (Train)

41. These procedures are governed by the University Senate 19 Assessment Regulations, and the relevant PSRBs standards and codes for fitness to practise (train).
42. It is the responsibility of the student to be aware of, adhere to, and engage with this procedure, and other associated policies and procedures as required.
43. The aim of the procedure is to:
 - a) Safeguard the health and wellbeing of students, and protect patients, clients, staff, and/or service users;
 - b) Comply with requirements and standards set out by the relevant PSRB;
 - c) Acknowledge that pre-registration students are still learning. The University must ensure they meet professional standards and understand their importance. These standards should be introduced early, reinforced throughout the programme, and repeated before practical placements.
 - d) Prioritise the health and wellbeing of students by ensuring they receive suitable support and guidance. Where necessary, reasonable adjustments will be implemented to help students meet the required standards;
 - e) Protect the University against legal challenges arising from incidents related to students being suspected of or determined to be unfit to practise (train).
44. The Procedure outlines different stages to manage fitness to practise (train) concerns. There are five possible referral routes to the Fitness to Practise (Train) Procedure:

Professionalism, Support, and Reflection Plan (ProSPR) Framework	• Concerns about character, professional conduct, engagement with the programme and/or competency • Concerns about students' health and wellbeing
Disclosure and Barring Service (DBS) Process	• Significant concerns about cautions, convictions and/or non-convictions
Academic Misconduct Process	• Allegation of academic misconduct is considered serious enough to impact on students' fitness to practise (train)

Direct Referral from the Executive Dean (or nominee)	Concern is deemed sufficiently serious or where the patient, client, public or students' own safety is compromised
Student Disciplinary Regulation	Any misconduct that may impact fitness to practise (train) requirements

Professionalism, Support, and Reflection Plan (ProSPR) Framework

45. The ProSPR framework aims to assist staff in managing and addressing concerns regarding a student's character, professional conduct, engagement, competency, health, and/or wellbeing within the university environment and placement settings. The primary goal is to adopt a supportive, restorative, and reflective approach at the earliest stage that facilitates student development and paves the way for academic and professional success.

Areas of concern as outlined in the Professionalism, Support, and Reflection Plan Framework may relate to:

Concerns about Character, Professional Conduct and/or Competency

45.1 Students must always uphold professional standards (in and out of the workplace) to ensure public trust and confidence in the profession, in line with the requirements of the PSRBs.

Concerns include but are not limited to:

- a) Unsafe practice
- b) Lack of honesty and integrity
- c) Lack of professionalism
- d) Suggestions of harm to another person
- e) Breach of confidentiality
- f) Poor timekeeping
- g) Lack of engagement with professional requirements of programme
- h) Inappropriate behaviour (rudeness, aggression, misuse of social media, unprofessional dress and not following instructions when appropriate)

Concerns about Students' Health and Wellbeing

45.2 Students must demonstrate that they are in good health, which means that they are capable of safe and effective practice (with or without reasonable adjustments). This does not mean the absence of a health condition or disability. However, if ill health affects the achievement of learning outcomes and/or behaviour during the programme it needs to be considered accordingly. Health concerns must be dealt with and reviewed in accordance with occupational health guidance, and relevant

University guidance. It may be advisable to hold a case conference with relevant health and support services within the University, to assess the individual's situation, provide support to students, and agree the best options in addressing concerns about health.

45.3 Reasonable adjustments should be considered at admission and throughout a student's period of study, in accordance with relevant University guidance and legal obligations. Whilst reasonable adjustments may be implemented to support a student's participation and progression, students must ultimately demonstrate that they meet the programme's required competence standards for professional practice. Adjustments cannot remove or modify these competence standards.

45.4 Students have an ongoing responsibility throughout their programme of study to disclose any health, conduct or character matters that may affect their fitness to practise. Such matters should be reported, verbally or in writing, to the Programme Director or nominated representative at the earliest opportunity. Disclosures will be managed sensitively and in accordance with relevant University policies. The Programme Director (or nominee) must record relevant concerns and, where appropriate, initiate a Fitness to Practise referral.

45.5 Students who do not disclose any relevant health or character concerns may be subject to the initiation of the Fitness to Practise (Train) Process. Non-disclosure may automatically be deemed a serious fitness to practise (train) issue.

Interruption of Study

45.6 Students may take a negotiated break from their programme of study in line with the Interruption of Study Policy. If students breach PSRB requirements on good health or there are multiple interruptions of study, a referral to fitness to practise (train) process based on health and wellbeing concerns may be triggered following advice from the Executive Dean (or nominee).

Senate Regulation 10 – Support for Study

45.7 The Support for Study is in place to recognise the need for proactive management and support for students. The guiding principles of Support for Study will be managed as follows:

- a) To provide a supportive, engaging, and inclusive learning environment for students, conducive to education, research, and a positive student experience.
- b) To support students if there are concerns about students' wellbeing and/or behaviour which may be related to mental and/or physical health and which are having an impact on them or on others.

Safeguarding Concerns

45.8 Serious safeguarding concerns may be referred to a Fitness to Practise (Train) investigation in accordance with the University's Safeguarding Policy. Such concerns may include:

- a) Concerns that a child may be at risk of harm or has suffered harm.
- b) Concerns that an adult at risk may be at risk of harm, abuse or neglect.
- c) Character, conduct or professional behaviour concerns relating to the safeguarding of a child or adult at risk, whether arising within a student's

professional role, placement activities or personal conduct.

- d) Any other safeguarding matter that raises concerns about a student's suitability for professional practice.

In managing safeguarding concerns, information will be shared on a need-to-know basis and in accordance with relevant safeguarding, data protection and confidentiality requirements. The safety and welfare of children, adults at risk and students will be prioritised at all times.

Disclosure and Barring Service (DBS) Process

- 46. The Disclosure and Barring Service Process (DBS) sets out how declarations of a criminal record or convictions will be addressed. A DBS Panel can refer students to fitness to practise (train) if a student is being subject to a criminal cautions and/or convictions, or they fail to disclose a caution/conviction, the number and frequency of offences, nature and seriousness of the offence and its relevance to the intended profession.
- 47. The DBS Process explains how criminal record declarations are handled. If there are serious concerns, such as a student having criminal cautions or convictions, not disclosing them, or having multiple or serious offences, a DBS Panel may refer the student to fitness to practise (train). Having a criminal record doesn't automatically prevent someone from training, but it might affect their ability to register with a PSRB. For full details, see the DBS Policy.
- 48. If during their studies, students are accused of, charged or convicted with an offence or become the subject of a police investigation, they must declare this immediately to the university by emailing the designated team. The case will be considered by a DBS Panel, in accordance with the DBS Policy. Failure to promptly declare this to the University will likely result in formal fitness to practise (train) proceedings.

Academic Misconduct Process

- 49. The Academic Misconduct Panel has the right to refer students to the Fitness to Practise (Train) Procedure if there are considerable concerns about academic misconduct that are deemed serious enough to impact on students' fitness to practise (train). For example, substantial plagiarism may demonstrate students' lack of honesty and integrity leading to concerns about their character.

Direct referral from the Executive Dean (or nominee)

- 50. The Executive Dean (or nominee) has the power to suspend students and refer them directly to a fitness to practise (train) investigation if their case is deemed sufficiently serious or where the patient, client, public or the students' own safety may be compromised. In this case, students will be immediately suspended from placement. In exceptional cases, students may be suspended from both the academic and practice element of the programme.

Investigation

51. Serious concerns regarding a student's progress, conduct, or health will be formally reported to the designated team. The team will appoint an independent Investigating Officer (IO) to investigate the case following the IO protocol. The IO will be supported by a Case Handler throughout the investigation. The IO will act fairly and proportionately, balancing the interests of patients and/or the public with those of the student.

Information to Students

52. When a formal investigation into fitness to practise (train) proceedings begins, the student will be informed of:
- a) Specific concerns or allegations being raised;
 - b) How these are related to university policies or professional standards, including guidance from the relevant body;
 - c) The name and role of the Investigating Officer appointed.
 - d) An invitation to:
 - i. Attend a meeting with the Investigating Officer (IO); and/or
 - ii. Submit a written statement with any supporting evidence.
 - e) The process that will be followed and the possible outcomes;
 - f) Support available to the student throughout the process;
 - g) The right to be accompanied by a friend, family member, or an official of the Students' Union or any other relevant union during any related meetings;
 - h) Additional allegations arising during the investigation. The student will be informed and given the opportunity to respond before a finding is made.

Possible Outcomes of an Investigation

53. Investigations will normally be concluded within 20 working days. In complex cases, additional time may be required, and students will be kept updated on progress.

The investigation will result in one of the following outcomes:

- a) Outcome 1:** There is no case to answer, and thus, no further action is necessary.
- b) Outcome 2:** There is a case to answer, but it can be addressed through corrective or developmental measures, referring to Professionalism, Support, and Reflection Plan Framework.

These measures are designed to help the student reflect, learn, and develop professionally, while addressing any concerns raised. Corrective or developmental measures that may be assigned by the Investigating Officer (IO) include, but are not limited to:

- i. The student receiving a warning
- ii. The student submitting a reflection
- iii. The student completing an educational or training activity
- iv. The student offering a written or verbal apology
- v. The student being required not to contact certain individuals, either directly or

- indirectly
- vi. Any other reasonable action deemed appropriate to address the concern and support professional development

When determining any corrective or developmental measures, the Investigating Officer (IO) should refer to the guidance provided in the Professionalism, Support, and Reflection Plan Framework.

- c) **Outcome 3:** There is a case to answer, and the matter is serious and/or the behaviour is persistent. In such cases, the matter will be referred to a Fitness to Practise (Train) Panel for further consideration.

54. If the Investigating Officer (IO) determines, on the balance of probabilities, that there is a case to answer, the following factors will be considered before deciding on the appropriate outcome:
- a) Insight – Consider the extent to which the student:
 - i. Accepts that their behaviour fell below professional standards, understands how and why it occurred, and recognises the consequences for those affected, as well as potential professional implications.
 - ii. Can demonstrate that they have taken action to address the failure in a way that remedies any past harm (where possible) and reduces the likelihood of recurrence.
 - b) Remorse – Whether the student has shown genuine remorse for their actions.
 - c) Honesty and integrity – Whether the student demonstrated honesty and integrity throughout the fitness to practise (train) investigation process.
 - d) Cooperation – Whether the student engaged constructively with the investigation process.
 - e) Previous record – Whether this is a first offence or there are previous findings of fitness to practise (train) concerns.
 - f) Responsiveness to prior warnings – Whether the student responded positively to any reasonable warnings or concerns about their behaviour before the investigation commenced.
 - g) Intent or premeditation – Whether the conduct was, to any extent, intended or premeditated.
 - h) Mitigating factors – Any factors that might reduce the seriousness or culpability of the behaviour.
 - i) Aggravating factors – Any factors that might increase the seriousness or impact of the behaviour.
55. Where concerns relate to a student's behaviour or performance on placement, the Investigating Officer must have direct insight into the placement environment or consult an appropriate representative from the placement provider. Consultation with the programme team should also be sought to ensure that any recommended conditions are feasible for the programme team to implement, including with respect to placements.

Review of the Investigation Outcome

56. If a student is issued an Outcome 2, they have the right to request a review of the IO's decision.

The student may request a review if they believe the outcome is unfair, unclear, or based on a misunderstanding. They may:

- Seek clarification from the IO or the relevant team
- Provide a written response or reflection
- Request an internal review of the outcome

Internal Review by a New Investigating Officer (IO)

57. If, after receiving clarification, the student still feels their concerns have not been fully addressed or the response remains unclear, they may request an internal review.

To ensure impartiality, a new IO can be assigned to review the case. The new IO will:

- Review the evidence, procedures followed, and the reasonableness of the original outcome
- Communicate their decision, including any changes and the next steps

58. Possible outcomes of the review include:

- a) Outcome Stands – The original IO outcome is confirmed as fair, reasonable, and consistent with procedures. No changes are made.
- b) Outcome Amended or Clarified – The new IO may adjust the original outcome (for example, modifying an action plan, clarifying instructions, or updating expectations) if minor procedural issues, misunderstandings, or ambiguities are identified.
- c) Further Investigation Required – If significant gaps or procedural errors are identified, the new IO may request additional investigation before making a final decision.

Final Investigation Report

59. A final investigation report should include the following:

- a) A clear rationale for the decision, including that all other options have been considered;
- b) Concern(s) leading to referral, including actions instigated at programme level through the relevant process are summarised comprehensively, and presented in chronological order;
- c) The grounds of referral, alongside all aspects and implications that correlate to the concern(s), linked to the relevant PSRB Code or Guidance;
- d) All evidence gathered during the investigation in a coherent and sequential manner; evidence must be annotated or redacted as required;
- e) If applicable, any implications that the Fitness to Practise (Train) Panel should be aware of, e.g., period of registration, interruption of studies, placement requirements, progression rule, seconded student, etc;

- f) Where applicable, DBS checks, Occupational Health checks and the student's file should also be made accessible to the Panel.

Fitness to Practise (Train) Panel

60. A Fitness to Practise (Train) Panel can be convened on the basis of an Investigation on the following routes:
- (i) a fitness to practise investigation with Outcome 3 (e.g. Lack of complying with the ProsPR action plan)
 - (ii) an investigation under the Academic Integrity and Misconduct Policy
 - (iii) an investigation under the Senate 13 Student Disciplinary Regulations
 - (iv) a Disclosure and Barring Panel outcome
61. The Fitness to Practise (Train) Panel will normally be convened within 20 working days once the referral has been reviewed.
62. The School shall establish a Fitness to Practise (Train) Panel, members of which must be appropriately trained.
63. The Fitness to Practise (Train) Panel will generally comprise three or more members, as deemed appropriate based on the specifics of the case.
64. The Fitness to Practise (Train) Panel membership:

Chair
a) a member of staff from the pool of trained Chair persons
Panel Members
b) a member of university staff and/or student
c) a Practise Partner or registrant of the relevant Registration Body (from City St George's or external to the University)

65. For referrals on the grounds of safeguarding concerns, the Panel may include the School's Safeguarding Officer or may liaise with them for advice and guidance on the referral.
66. A professional member of staff (or nominee) will act as Secretary to the Panel, and an observer may be present at the Panel for the purpose of training, but neither will be part of the Panel.
67. The IO may be invited to attend the Panel to present the case and supporting evidence. However, they will not be members of the Panel and will not participate in its deliberations or decision-making.
68. The Panel may seek advice or guidance from an expert, e.g., legal adviser on

specific questions or regulations.

69. The Panel must include at least one member able to assess the feasibility of proposed actions in practice, to ensure that recommendations are realistic and implementable. Consultation with the programme team should also be sought to confirm that any recommended conditions are feasible for the programme team to implement, including with respect to placement.
70. To avoid any possible conflict of interest, the Panel will not include a member who has prior knowledge of the case to be considered, has been involved in the process beforehand, or has provided pastoral care to the student concerned.
71. Panel members should have received appropriate training and should be familiar with this policy and relevant professional standards. For the Fitness to Practise (Train) Panel to convene, the presence of all members is mandatory. The panel meetings can be conducted in-person, online or hybrid. The chosen format will be determined and informed to all participants in advance. In certain instances, the student will be required to attend in-person, and this stipulation will be relayed to them ahead of time.

Student Representation

72. The student is required to attend the Panel. A representative alone cannot attend on behalf of the student.
73. In cases where a student does not attend without submitting in writing valid reasons for a postponement, the Panel may decide to proceed in their absence. Before making its decision to proceed, the Panel must carefully consider all the evidence that reasonable effort has been made to communicate with the student. The rationale for deciding to proceed in a student's absence must be clearly documented and communicated to the student.
74. The student has the right to be accompanied to the Panel by one other person to support them at the hearing, such as a representative from City St George's, University of London Students' Union Advice and Support Service, a Personal Tutor, a friend or family member. The student must provide information about the person to the Secretary of the Panel at least 7 working days in advance. The information will include the person's relationship with the student, and the reason for the person's attendance.
75. The Fitness to Practise (Train) Procedure is an internal process and is not a legal process so should not be viewed as legal proceedings. Where a student insists on legal representation in a hearing, the University reserves the right to arrange its own legal representation. In these circumstances, it may take longer to convene the Panel. If the student chooses to be accompanied by a professional advocate, they must inform the Secretary to the Panel at least 7 working days before the Panel.
76. The student will receive the same papers and evidence as the Panel, normally 2 weeks before the hearing date. All supporting evidence should be submitted no later than 7 working days prior to the Panel meeting to facilitate a thorough

review. The panel reserves the right to reject evidence provided after this deadline/is not mandated to accept evidence provided after this deadline. The decision will be made on a case-by-case basis. Any evidence provided after the deadline must be accompanied by a written explanation as to why this has been submitted late. Submission of evidence on the day of the meeting could lead to a possible adjournment. The student must be advised to seek advice and support from the Students' Union Advice Service at the earliest opportunity.

77. The Students' Union is independent from the University and provides free, confidential, non-judgmental and impartial advice to students. The service is there to help the student prepare for the Panel, and if asked for, to accompany the student and provide support and guidance at the hearing.
78. The student must be provided with the Fitness to Practise (Train) Policy and links to relevant PSRB professional standards, code and/or guidance.

Fitness to Practise (Train) Panel Terms of Reference

79. The Panel will adhere to the terms of reference as noted below:
 - a) It must first determine whether the allegation/s against the student should be dismissed, upheld, or partially upheld.
 - b) To determine, on the basis of evidence and findings presented to it, whether students who have been referred are fit to practise (train) for progression, registration and practice;
 - c) To provide opportunity for responding students to demonstrate that they have the skills, knowledge, understanding, good character and good health, whilst recognising that, at pre-registration level, students are still learning;
 - d) To consider cases in a fair and transparent manner;
 - e) To check that students have had access to relevant support services;
 - f) To make decisions in accordance with the Fitness to Practise (Train) Policy and University Senate 19 Assessment Regulations, and taking into account appropriate PSRB professional standards, codes of conduct, Practise and guidance;
 - g) To safeguard the health and wellbeing of students, patients/clients and the general public and to uphold the public's trust in the profession.

Procedure for the Conduct of a Panel

80. The Panel will rely on only the evidence available in the dossier that is shared with them and the student, as well as the verbal testimonies during the hearing. Where applicable, the referrer and/or the Chair may request evidence from third parties.
81. To maintain transparency and fairness, Panel members are prohibited from communicating about the case with the Programme Director or any other member of University or Practice staff associated with the case. The Panel

members must not share information or documentation related to the case with any other member of University or Practice staff, students, or external parties.

82. The Panel will convene prior to the student joining the meeting to ensure the Panel is clear on the process, grounds of referral, and to agree on areas of questioning.
83. The case shall be considered in accordance with this policy, with relevant PSRB professional standards, code of conduct, practise and guidance, and referring to University Senate 19 Assessment Regulations.
84. The Secretary to the Panel will document the proceedings during the meeting. Additionally, the meeting will be recorded to aid in accurate note-taking. It is strictly forbidden for any unauthorised electronic recording of the hearing to occur. A report of the proceedings will be provided to the student and the Panel normally within 20 working days.
85. The Panel shall convene as follows, the Chair will:
 - a) commence the Panel by inviting all present to introduce themselves;
 - b) verify the student's identity at the beginning of the hearing by asking the student to present their ID to the Panel. If online, they will be asked to hold their student ID in front of the camera;
 - c) outline the process by which the Panel will be conducted, making clear that the Fitness to Practise (Train) Panel is an internal University process and does not constitute a legal proceeding.;
 - d) confirm to the student that all panel members are independent and appointed to consider the referral in accordance with the Fitness to Practise (Train) Policy;
 - e) ask the student to confirm they have received the papers prior to the Panel;
 - f) ask the student if they have a clear understanding of why they have been referred to the Fitness to Practise (Train) Panel;
 - g) outline the grounds on which the student has been referred to the Panel;
 - h) invite the Investigating Officer to present the case where appropriate
 - i) invite questions from the Panel and/or student to the Investigating Officer
 - j) invite the student to make a statement;
 - k) invite questions from the Panel members to the student;
 - l) provide the student with an opportunity to make a final statement;
 - m) proceed to seek confirmation from all Panel members that all necessary information or questioning has taken place;
 - n) request the IO, the student and their representative to retire while the Panel considers its decision;
 - o) invite the student for further questioning if any clarification or information is deemed necessary;

- p) propose a short break if required, being mindful for students who may benefit from more breaks or longer breaks;
 - q) invite the student and, where applicable, their representative to re-join the Panel to receive its decision and findings, or to inform them if the Panel requires additional time to deliberate, including an indication of the timeframe within which the student may expect to receive the outcome.
86. The Secretary of the Panel (on behalf of the Chair) will notify the student that the decision of the Panel will be confirmed in writing within 20 working days.

Decisions - General Principles

87. The Panel will make its decision based on: the grounds of referral, the evidence submitted; the findings of the Panel; the student's response at the Panel; taking the student's status as a learner into account; and taking into consideration risk(s) to public protection and confidence in the profession.
88. The Panel is required to reach one of the following decisions:

a) Outcome 1: Fit to Practise (Train)

- (i) The student is deemed fit to practise (train).
- (ii) No further action is required.
- (iii) The student may continue on the programme and proceed to apply for registration with the relevant PSRB.

b) Outcome 2: Fit to Practise (Train) – Subject to Conditions

- The student is currently not fit to practise (train) but may become fit to practise upon successful completion of a supportive action plan following the framework specified within the Professionalism, Support and Reflection Plan.
- The Panel may impose one or more of the following conditions:
 - (i) Completion of specified educational activities.
 - (ii) Submission of a written reflection.
 - (iii) Issuance of a formal written warning (with a defined duration).
 - (iv) Supervised Practise or repeat of specific programme components.
 - (v) Restrictions on contact with certain individuals.
 - (vi) Any other action deemed appropriate to support remediation.

The Panel will specify:

- The timeframe for completion.
- The person or body responsible for monitoring progress.
- The criteria for demonstrating fitness to practise (train).

Failure to meet the conditions may result in referral back to the Panel for further consideration.

c) Outcome 3: Not Fit to Practise (Train)

- (i) The student is found not fit to practise (train).

- (ii) The student's registration on the programme will be terminated.
- (iii) The Panel may decide on:
 - Conferment of an academic exit award, where appropriate.
 - Revocation of eligibility to apply for PSRB registration, even if an exit award is conferred.
 - No award, if the misconduct undermines the integrity of the qualification or poses a risk to public safety.

Additional Considerations

89. The Panel may consider:
- a. Alternative placement arrangements, where possible.
 - b. Transfer to a non-clinical programme, where appropriate and subject to programme requirements.
 - c. Reporting to external bodies, such as the DBS, PSRB, or Safeguarding Board, if public protection is at stake.
 - d. Implications for student funding, visa status, or fees, which must be communicated to the student.

Communication of Decision

90. The Panel's decision will normally be communicated to the student in writing within 20 working days.
91. A copy of the decision will be placed on the student's record and reported to the Assessment Board and relevant PSRBs, as required.
92. In reaching its **Outcomes 2 or 3** the Panel will consider all aspects covered under section 54 [Investigation](#).
93. At any time during the proceeding, the Chair may decide to adjourn the Panel for the purpose of deciding on the outcome and/or to seek further evidence or clarification. In such cases, a decision may be deferred until further information is obtained.
94. If the Panel has concerns about the student's health or wellbeing, the Chair may adjourn the hearing. In such cases, the student may be:
 - a. **Suspended** from the programme, or
 - b. **Placed on an Interruption of Study** for a specified period.Before the process resumes, the student will normally be required to obtain clearance from Occupational Health or another assessor appointed by the Panel.
95. Formal fitness to practise (train) Investigation outcomes and Panel outcomes will be reported to the relevant Registration Body at the time of application for provisional registration or registration where applicable.
96. For students on MBBS Medicine course (5-year and 4-year) only: In the interests of patient and public safety, and to prevent fraudulent applications to courses which lead to entry to a registered profession in the UK, information

about medical students who have been through a fitness to study and practise hearing and been found unfit to practise will be recorded on the GMC/MSc's Excluded Students Database and may be shared between Higher Education institutions. This includes cases where fitness to practise (train) hearings have been held in the student's absence.

After the Panel

97. The Secretary to the Panel will prepare the letter and a written report outlining the decision of the Panel, including the rationale for its decision. This will be communicated to the student, the relevant Programme Director (or nominee), and any other relevant parties normally within 28 working days of the Panel.
98. The Fitness to Practise (Train) Panel decision will be noted at the Assessment Board presented by the Programme Director in accordance with Senate Regulation 19 Assessment Regulations. A copy of the findings and decision of the Fitness to Practise (Train) Panel will be placed on the student's record in accordance with the GDPR and Data Protection Act 2018.
99. The Programme Team will implement any recommendations made by the Panel, as deemed necessary.
100. If a student is found fit to practise and permitted to continue on the programme, it does not guarantee that the PSRB will permit the student to be registered with them following successful completion of their programme.
101. A record of the outcome of the Fitness to Practise (Train) Panel will be retained for reporting to the Board of Studies and Senate.

Fitness to Practise (Train) Process for Seconded Students and Apprentices

Definition of Seconded Students

102. Seconded students are enrolled at the University but continue to receive a salary or training grant from their seconding NHS Trust or independent healthcare provider. Because the employer has a vested interest in the student, the University must inform the Trust of any concerns, including those related to fitness to practise (train).
103. This section explains the process for students seconded by their employer (NHS Trust or Independent Sector) to undertake a programme of study at City St George's, University of London.
104. Fitness to practise (train) concerns may be raised by either the employer or the University. Each organisation will investigate concerns independently and make decisions based on its own regulations. Fitness to Practise Panels must be held separately because the individual is both an employee and a student.
105. As each organisation considers the case from its own perspective—employer versus educator—their decisions may differ.

- 106.** Where appropriate, a joint meeting may be held between University staff, Trust staff, and the student to share relevant information.
- 107.** If patient, staff, or individual safety is compromised, or the issue remains unresolved, the student may be suspended from placement as a precaution. The student must be informed in writing, including the reasons for suspension, within seven working days.
- 108.** After the combined meeting, each organisation will proceed with its own process:
- a. The employer will follow its internal procedures.
 - b. The University will apply its Fitness to Practise (Train) Policy and Procedure. Both organisations must share relevant evidence within a reasonable timeframe (within 10 working days, or as soon as practicable and no later than 20 working days).
- 109.** Once both organisations have reached a decision, the outcome will be shared with the partner organisation, in compliance with GDPR and the Data Protection Act 2018.
- 110.** The University's decision will fall into the same categories as those for non-seconded students. When combined with the employer's decision, four likely scenarios may occur:
- a. Fit to practise (train) – Both agree the student can continue on the programme without implications.
 - b. Not fit to practise (train) – Both agree the student should be withdrawn. The University will recommend withdrawal to the Assessment Board, which may confer an appropriate exit award. The employer will take its own action.
 - c. University: fit / Employer: not fit – The student may continue on the programme if self-funding and placements are available. Alternative programmes may be considered.
 - d. Employer: fit / University: not fit – The University may recommend withdrawal or transfer to a non-clinical programme. The employer will decide its own action.
- 111.** The student may appeal the University's decision following the appeal process detailed within this procedure. The employer will follow its own appeal process.

Reconsideration of allegations

- 112.** It may be appropriate for the University to reconsider an allegation if new evidence emerges which, for good reason, could not have been obtained at the time. In deciding whether it is appropriate to consider an allegation for a second time, the University will consider:
- a. whether the outcome of the first process has been called into question, and if so why;
 - b. the strength and reliability of the evidence;
 - c. the length of time that has elapsed and the effect of this on the reliability of any evidence to be considered;
 - d. the severity of the alleged offence;
 - e. the impact on the student;

- f. whether leaving the matter unaddressed would impact on matters of fitness to practise (train), or on any obligations to professional or regulatory bodies in respect of the student's character.
- 113. The decision to reconsider an allegation would be taken as soon as possible after the emergence of the new evidence, and no later than 15 working days from the emergence of this new evidence.
- 114. Reconsideration of an allegation will only take place in exceptional circumstances and following approval from the Executive Dean.

Appeals

- 115. Students have the right to appeal Outcomes 2 and 3 of a Fitness to Practise Panel and the internal review of the investigation stage. Guidance on the appeals process will be outlined in the outcome letter. If a student believes a decision was affected by their lawful expression or academic viewpoint, this may be raised within the appeal and will be considered under the appropriate procedure, with referral for specialist consideration where relevant in line with the University's Code of Practice on Freedom of Speech and Academic Freedom.
- 116. On receipt of the outcome letter, students have the right to submit an appeal within 20 working days.
- 117. An appeal with accompanying evidence can be submitted following receipt of the decision via email. The grounds for appeal must be clearly stated.
- 118. The student is encouraged to seek support from the Students' Union Advice and Support Service by contacting unionadvice@citystgeorges.ac.uk.
- 119. A student may appeal a fitness to practise (train) panel outcome if one or more of the following can be shown to apply:
 - a) that staff or bodies have failed to follow regulations and/or procedures or have failed to follow them with due care;
 - b) that staff or bodies have shown bias or prejudice towards the student in the way they have made the relevant decision;
 - c) that relevant new evidence has become available that should be considered, and there are valid reasons why it was not provided earlier;
 - d) that the decision was unreasonable and/or the outcome was not proportionate in the circumstances.
- 120. For fitness to practise (train) referrals, appeals are not permitted on the grounds of previously known but undisclosed extenuating circumstances. Fitness to practise (train) refers to the ability to meet professional standards, encompassing character, professional competence, and health. Students are required to sign a self-declaration of good health and good character at relevant intervals throughout the programme.

121. The appeal is not a reopening of the original Panel. Dissatisfaction with the decision of the Fitness to Practise (Train) Panel is not alone a valid ground for submitting an appeal.

Fitness to Practice Appeal Panels

122. Appeal Panels will normally be convened within 20 working days of the student submitting their request to review the FtP panel's decision. The Panel may comprise of three members as outlined under 'Fitness to Practise (Train) Panel' paragraph 64.
123. Members of the Fitness to Practise (Train) Appeal Panel must not have prior knowledge of the student's case.
124. Possible outcomes available to the Fitness to Practise Appeal Panel:
- (i) that the findings of the Fitness to Practise Panel or the Internal Review of Outcome 2 should be confirmed and the appeal dismissed.
 - (ii) that there has been a failure to follow the University's regulations and/or procedures or to follow them with due care;
 - (iii) that there was bias or prejudice towards the student in the way the Fitness to Practise Panel/ or the Internal Review of Outcome 2 reached its findings or in other aspects of the Fitness to Practise (Train) Procedure;
 - (iv) that relevant new evidence that was not available to the Fitness to Practise (Train) Panel at the time for valid reasons should be considered;
 - (v) that the decision of the Fitness to Practise (Train) Panel/ the Internal Review of Outcome 2 was unreasonable and/or that the outcome was not proportionate with the evidence presented in the circumstances.

Where the finding is (ii), (iii), (iv) and/or (v), the Appeal Panel may:

- if necessary direct the matter be reinvestigated by a different IO or heard by a newly constituted Fitness to Practise (Train) Panel;
- or, where the unfairness to the student is extreme, nullify the outcome of the previous stage, end the process and, if relevant, reinstate the student.

The Appeal Panel will also consider whether there has been any unfair adverse impact on the student and whether the University should provide a remedy.

125. The Appeal Panel Secretary conveys the outcome to the student.

Appeal Stage for Foundation Year 1 (FY1) doctors

126. A limited number of doctors experience significant difficulties during the first year of Foundation Programme training (FY1), serious enough to require them to have additional targeted training measures and/or support. A smaller sub-group of doctors experience more fundamental difficulties. This normally necessitates a repeat of the FY1 year, or an element thereof which may include additional educational support, supervision, and assessment. Such extensions to FY1

training are for a maximum of 12 months. Appeals with respect to a decision to extend the FY1 year of training are not eligible to be considered under this procedure. Such appeals will be heard by the Postgraduate Deanery (the regional body responsible for managing the Foundation Programme).

127. FY1 doctors who do not benefit from additional training and whose level of knowledge, skills or professional behaviour continues to preclude full registration with the GMC and consequent confirmation of a licence to practise, may appeal the decision not to award a Certificate of Experience to the University. Such appeals will only be heard after the initial period of FY1 training (12 months) has been previously extended by the appointing Postgraduate Deanery, the regional body responsible for managing the Foundation Programme).
128. An FY1 doctor who has been denied a Certificate of Experience, may request to have a Fitness to Practise (Train) Appeal Panel be convened. The appeal must be submitted via email to scc@sgul.ac.uk within 20 working days from being informed of the decision.
129. Please note that if an Appeal Panel is convened to review a Postgraduate Deanery decision, it does NOT have the authority to:
 - a) substitute the outcome of the Postgraduate Deanery with its own decision;
 - b) nullify the outcome of the previous stage

The Office of the Independent Adjudicator

130. When the University's internal procedures have been concluded students will be issued with a Completion of Procedures (CoP) letter. Following this, students who are dissatisfied with the final decision on their case may be able to apply to the Office of the Independent Adjudicator (OIA) for Higher Education. Information and eligibility rules are available at: www.oiahe.org.uk/

Review and Reports

131. An annual report on fitness to practise (train) is considered by Board of Studies and Senate;
132. The School is required to report fitness to practise (train) referrals to Assessment Boards, PSRBs, Higher Education England, and its NHS commissioners, as deemed necessary;
133. The Policy and Procedure will be reviewed annually and considered by the Board of Studies and Senate;
134. The Assessment Board will consider reports on the declaration of good health and good character for students qualifying on programmes with PSRB requirements.

Appendix 1 Areas of concern

The following types of concern could lead to a fitness to practise process (list is not exhaustive):

a. Any criminal conviction, caution or reprimand

(except parking or speeding offences which are subject to fixed penalties)

- Failure to promptly declare any conviction/ caution/ reprimand or to notify us that you became the subject of a police investigation.

b. Drug or alcohol misuse

- Drunk driving
- Alcohol consumption that affects clinical work or the work environment
- Dealing, possessing or misusing drugs even if there are no legal proceedings

c. Aggressive, violent, intimidating, or threatening behaviour

- Assault
- Physical violence
- Bullying
- Abuse

d. Persistent inappropriate attitude or behaviour

- Uncommitted to work
- Neglect of administrative tasks
- Poor time management
- Non-attendance
- Poor communications skills
- Failure to accept and follow educational advice

e. Academic misconduct (please refer to the Academic Integrity Procedure)

f. Unprofessional behaviour or attitudes

- Breach of confidentiality
- Misleading patients about their care or treatment
- Culpable involvement in a failure to obtain proper consent from a patient
- Sexual, racial or other forms of harassment
- Failure to keep appropriate boundaries in behaviour
- Persistent rudeness to patients, staff, students or others
- Unlawful discrimination
- Conduct/behaviour which has undermined, or may undermine, public confidence in the profession

g. Health concerns and insight or management of these concerns

- Failure to seek medical treatment or other support
- Refusal to follow medical advice or care plans, including monitoring and reviews, in relation to maintaining fitness to practise.
- Failure to recognise limits and abilities or lack of insight into health concerns, including refusal to attend an Occupational Health appointment

h. Other concerns

- Where repeated concerns of a similar nature have been raised against the student;
- The student has demonstrated a lack of insight into their behaviour;
- The student has failed to engage with an application of either this procedure or any other University regulation, code, policy and/or procedure.
- Failing to demonstrate good professional practice;
- Failure to adhere to a warning, reasonable instruction, or Remediation Action Plan

Links to Useful Guidance

Professional Statutory and Regulatory Bodies Regulations, Standards and Code of Practise

This list is not exhaustive and checks should also be made to ensure the appropriate Code of Practise is applied where the relevant PSRB is not listed within this document.

Nursing and Midwifery Council

<https://www.nmc.org.uk/>

The Code - Professional standards of Practise and behaviour for nurses, midwives and nursing associates

<https://www.nmc.org.uk/standards/code/>

Guidance on health and character of a student

<https://www.nmc.org.uk/education/becoming-a-nurse-midwife-nursing-associate/guidance-for-students/>

Guidance on using social media responsibly

<https://www.nmc.org.uk/standards/guidance/social-media-guidance/> _

Understanding Fitness to Practise

<https://www.nmc.org.uk/ftp-library/understanding-fitness-to-practise/> _

General Medical Council

Achieving Good Medical Practice

[Achieving good medical practice: guidance for medical students - GMC](#)

General Optical Council

<https://www.optical.org/>

Code of Conduct

<https://optical.org/en/publications/code-of-conduct/>

Standards for optical students

<https://optical.org/en/standards-and-guidance/standards-for-optical-students/>

Health and Care Professions Council

<https://www.hcpc-uk.org/>

Standards of Conduct, Performance and Ethics

<https://www.hcpc-uk.org/standards/standards-of-conduct-performance-and-ethics/>

Guidance on Conduct and Ethics for Students

<https://www.hcpc-uk.org/students/guidance-on-conduct-and-ethics/>

Guidance on the use of social media

<https://www.hcpc-uk.org/standards/meeting-our-standards/communication-and-using-social-media/guidance-on-use-of-social-media/>

How the Standards apply to students

<https://www.hcpc-uk.org/students/how-the-hcpc-standards-apply-to-students/>

Standards of proficiency for speech and language therapists

<https://www.hcpc-uk.org/standards/standards-of-proficiency/speech-and-language-therapists/>

Standards of proficiency for radiographers

<https://www.hcpc-uk.org/standards/standards-of-proficiency/radiographers/>

Student Hub

<https://www.hcpc-uk.org/students/>

Fitness to Practise

<https://www.hcpc-uk.org/concerns/what-we-investigate/fitness-to-practise/>

Association for Nutrition

<https://www.associationfornutrition.org/>

Policy Title: Fitness to Practise (Train) Policy and Procedure	
Policy Enabling Owner and Department School of Health & Medical Sciences	Responsible for Implementation and Department School & Student Regulatory Compliance Team
Approving Body Senate	Date of Approval: September 2024 – Last Approval (City Legacy)
Last Reviewed & Version August 2026 Version 2	Review Due Date September 2027
Publication of Policy	
For public access online (internet)? ☒	For staff access only (intranet)? ☐
Website Link: Student policies and Regulations • City St George's, University of London	Intranet Link: n/a
Storage of Policy (<i>Previous versions of the policy must be stored in the drive by the author</i>)	
Drive Address reg-dev	
Queries about this policy should be referred to	
<i>Student Regulatory Compliance Team</i>	