

## Fitness to Practise Policy and Procedure

<b>Owner</b>	Head of Quality
<b>Version</b>	3.0
<b>Changes</b>	<ul style="list-style-type: none"> <li>• The document has been revised from a <b>procedure-only document</b> to a combined <b>Policy and Procedure</b>, providing clearer purpose, scope, and governance oversight.</li> <li>• The policy is now explicitly <b>student-led</b> and applies only to <b>applicants and students</b>; references to staff and HR processes have been removed.</li> <li>• The <b>scope has been clarified</b> to apply to programmes with <b>mandatory professional practice or placement components</b>, rather than relying solely on a fixed list of programmes.</li> <li>• <b>Optional placements</b> are now explicitly excluded from scope <b>unless</b> they involve regulated activity, safeguarding responsibilities, or professional practice equivalent to mandatory placements.</li> <li>• Decision-making responsibility has been clarified and <b>centralised under the Head of Quality (or nominee)</b> to ensure consistency and independence.</li> <li>• Clearer <b>triage between Fitness to Practise, Fitness to Study, Student Disciplinary, and Safeguarding procedures</b> has been introduced to avoid duplication and inappropriate escalation.</li> <li>• The definition of <b>Fitness to Practise</b> has been retained but <b>simplified and modernised</b> for clarity and accessibility.</li> <li>• The list of <b>triggers for Fitness to Practise</b> has been streamlined while retaining coverage of key professional, safeguarding, and integrity risks.</li> <li>• Health and disability considerations have been consolidated into a new <b>Accessibility and Support</b> section, aligning with Equality Act 2010 principles.</li> <li>• The approach to <b>reasonable adjustments</b> has been clarified, confirming that competence standards and professional requirements will not be lowered.</li> <li>• The <b>informal stage</b> has been simplified to focus on early resolution through support and monitoring, reducing unnecessary procedural complexity.</li> <li>• The investigation and interim suspension arrangements have been <b>simplified and made more proportionate</b>, removing unnecessary escalation requirements.</li> </ul>

	<ul style="list-style-type: none"> <li>• The <b>Fitness to Practise Panel</b> arrangements have been streamlined while retaining independence and fairness.</li> <li>• Outcomes have been <b>consolidated</b> and are now clearly guided by the principle of using the <b>least restrictive option first</b>.</li> <li>• Appeals rights have been clarified and aligned with the <b>relevant admissions or student appeals procedures</b>.</li> <li>• External reporting obligations (e.g. placement providers, awarding bodies, DBS, UKVI) have been retained but <b>streamlined for clarity and proportionality</b>.</li> <li>• The policy review cycle has been updated from <b>annual to biennial</b>, reflecting low usage and sector good practice.</li> </ul>		
<b>Approval date</b>	March 2026	<b>Approved by</b>	Academic Council
<b>Implementation date</b>	March 2026	<b>Date of next review</b>	January 2028
<b>Related internal policy</b>	<ul style="list-style-type: none"> <li>• Fitness to Study Policy and Procedure</li> <li>• Student Disciplinary Procedure</li> <li>• Student Safeguarding, Prevent and Harassment Policy</li> <li>• Attendance and Engagement Policy</li> <li>• Consolidated Student Appeals Procedure</li> <li>• Equality, Diversity and Inclusion Policy</li> </ul>		
<b>Related external policies and regulations</b>	None identified.		

## Contents

Introduction.....	4
Definition of Fitness to Practise .....	4
Scope and Application .....	4
Regulatory Framework and Related Procedures.....	5
Accessibility and Support .....	5
General Principles .....	6
Triggers for Fitness to Practise .....	6
Reporting Concerns and Initial Assessment .....	7
Informal Resolution and Monitoring .....	7
Interim Measures.....	8
Fitness to Practise Panel.....	8
Outcomes .....	8
Appeals.....	8
Confidentiality and External Reporting .....	9
Monitoring and Review .....	9
Programmes in Scope for Fitness to Practise.....	9

## Introduction

1. Regent College London (RCL) delivers programmes that involve mandatory professional practice or work-based placements, including engagement with children, vulnerable adults, or the public. The College has a responsibility to ensure that applicants and students undertaking such programmes are fit to practise in accordance with professional standards, safeguarding requirements, and public protection obligations.
2. This Fitness to Practise Policy and Procedure sets out a clear, fair, and proportionate framework for identifying, considering, and managing concerns about an applicant's or student's fitness to practise. It is intended to protect service users and the public, uphold professional standards, and ensure fairness to applicants and students.
3. The procedure is supportive in nature and aims to enable students to meet required professional standards wherever possible. Formal or restrictive outcomes will be applied only where necessary and as a last resort.

The College's Designated Safeguarding Lead ([rclsafeguarding@rcl.ac.uk](mailto:rclsafeguarding@rcl.ac.uk)) is responsible for oversight of safeguarding matters arising under this Policy, in accordance with the Student Safeguarding, Prevent and Harassment Policy.

## Definition of Fitness to Practise

4. Fitness to Practise refers to an individual's ability to meet professional standards of conduct, competence, character, and health in order to practise safely and effectively within a professional or placement setting.
5. An individual is considered fit to practise if they have the skills, knowledge, integrity, insight, and health required to undertake professional practice without posing unacceptable risk to service users, the public, or professional standards.

## Scope and Application

6. This Policy and Procedure applies to applicants and students enrolled on programmes delivered by Regent College London that include mandatory professional practice or work-based placements as part of the approved curriculum.
7. The procedure applies at any stage of the applicant or student lifecycle, including application, enrolment, placement, interruption of studies, and completion.

8. This policy is student-led and does not apply to members of staff. Any concerns relating to staff conduct, health, or professional suitability are managed under the College's Human Resources policies and procedures.
9. Optional or elective placements, internships, or work-experience opportunities do not normally fall within the scope of this Policy. However, where an optional placement involves regulated activity, engagement with children or vulnerable adults, or professional practice equivalent to that required on mandatory placements, the College may determine that this Procedure applies for the duration of that placement.
10. This Policy applies to programmes delivered directly by Regent College London and to programmes delivered in partnership with awarding bodies or partner universities where Regent College London retains operational responsibility for placement management.

### **Regulatory Framework and Related Procedures**

11. This Policy and Procedure is informed by relevant UK higher education regulatory and legal requirements, including safeguarding legislation, equality legislation, and sector good practice.
12. This Policy should be read in conjunction with the following College policies and procedures:
  - Fitness to Study Policy and Procedure
  - Student Disciplinary Procedure
  - Safeguarding and Prevent Policy
  - Attendance and Engagement Policy
  - Consolidated Student Appeals Procedure
13. Where concerns may fall under more than one procedure, the Head of Quality (or nominee) will determine the most appropriate route to ensure fairness, proportionality, and consistency.

### **Accessibility and Support**

14. Regent College London is committed to ensuring that this Policy and Procedure is applied in a fair, inclusive, and accessible manner in accordance with the Equality Act 2010. Applicants and students involved in Fitness to Practise processes may be experiencing stress, health difficulties, or other

challenging circumstances, and the College will take reasonable steps to support effective engagement with the procedure.

15. Reasonable adjustments will be considered for applicants and students with a disability, long-term health condition, or other protected characteristic. Adjustments are intended to remove barriers to participation and will not lower or remove competence standards or professional requirements.
16. Applicants and students may seek advice and support from Student Services, including wellbeing or disability support. Individuals may be accompanied to meetings or hearings by a supporter, normally a friend or family member. Legal representation is not normally permitted.

### **General Principles**

17. This Procedure is underpinned by the principles of fairness, natural justice, proportionality, and transparency.
18. Applicants and students will be informed of concerns raised about them, the evidence relied upon, and how those concerns relate to fitness to practise.
19. Decisions will be evidence-based, reasons will be provided, and there will be a clear route of appeal.
20. Matters will be handled as promptly as possible, consistent with fairness and the complexity of the case.

### **Triggers for Fitness to Practise**

21. Fitness to Practise concerns arise where there is a question about an applicant's or student's ability to meet professional standards, competence, character, or health requirements necessary for safe and effective professional practice.
22. Concerns may arise at any stage, including during application, study, placement, or following a break in study.
23. Circumstances that may give rise to concerns include, but are not limited to:
  - academic misconduct with professional implications;
  - other serious misconduct or behaviour calling professional suitability into question;

- failure to disclose required information, including criminal convictions or cautions;
  - falsified or inaccurate placement documentation;
  - unsafe practice, incompetence, or excessive supervision requirements;
  - unprofessional behaviour, dishonesty, or breach of confidentiality;
  - safeguarding concerns;
  - health conditions affecting safe practice where risks cannot be mitigated through support or reasonable adjustments.
24. The existence of a concern does not automatically mean an individual is unfit to practise. Each case will be considered on its own facts.

### **Reporting Concerns and Initial Assessment**

25. Concerns may be raised by College staff, placement providers, partner universities or awarding bodies, external agencies, or by the applicant or student themselves.
26. Concerns should be referred to the Head of Quality (or nominee), who will undertake an initial assessment to determine:
- the appropriate procedure to be applied;
  - whether immediate safeguarding or risk management action is required;
  - whether interim measures should be applied;
  - whether the matter may be managed informally or requires formal consideration.

### **Informal Resolution and Monitoring**

27. Where appropriate, concerns may be addressed informally through a meeting with the student to clarify expectations, professional standards, and support needs.
28. The student may be required to agree to a written Professional Conduct or Support Plan, including monitoring or reflective activity.
29. Failure to engage or further concerns may result in escalation to formal consideration.

## Interim Measures

30. Where there is a potential risk to service users, the public, or professional standards, interim measures may be applied.
31. Interim measures are precautionary, not disciplinary, and may include temporary withdrawal from placement or restrictions on practice activity.
32. Interim measures will be proportionate, confirmed in writing, and reviewed regularly.

## Fitness to Practise Panel

33. A Fitness to Practise Panel will be convened where concerns are serious, disputed, unresolved, or present significant risk.
34. The Panel will normally comprise at least three members, including an independent Chair and appropriate professional or subject expertise.
35. The applicant or student will be given at least ten working days' written notice of the Panel hearing, including details of the concerns, evidence, panel membership, and their rights.
36. The Panel will consider evidence on the balance of probabilities and may proceed in the applicant's or student's absence where appropriate.

## Outcomes

37. Possible outcomes include:
  - no case to answer;
  - monitoring or conditions;
  - reassessment or reflective work;
  - temporary suspension from placement or programme;
  - interruption of studies;
  - withdrawal from the programme as a last resort.
38. Outcomes will be proportionate, and the Panel will begin with the least restrictive option.

## Appeals

39. Applicants and students have the right to appeal against a Fitness to Practise decision on the grounds of procedural irregularity, new material evidence, or disproportionality.
40. Appeals will be considered in accordance with the relevant admissions or student appeals procedure.

### **Confidentiality and External Reporting**

41. Fitness to Practise matters will be handled confidentially, subject to the need to disclose information to placement providers, awarding bodies, professional bodies, the Disclosure and Barring Service, UK Visas and Immigration, or other bodies where required by law or regulation.
42. Applicants and students will normally be informed of any such disclosures.

### **Monitoring and Review**

43. Anonymised Fitness to Practise cases will be monitored through the College's academic governance structures.
- 44.
45. This Policy and Procedure will be reviewed every two years, or earlier where required by regulatory or sector changes.

### **Programmes in Scope for Fitness to Practise**

46. This Policy applies to programmes that include mandatory professional practice or placement components involving regulated activity or public protection responsibilities. A current list of programmes in scope is maintained by the Schools and reviewed periodically in line with programme and regulatory changes.