

British Psychotherapy Foundation (bpf) Code of Conduct for Students 2026

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Introduction

The Code of Conduct (known as the 'Code') is a formal set of guidelines that outlines the British Psychotherapy Foundation's (bpf) expected standards of behaviour. It acts as a shared agreement that defines our key values, and what action will be taken when our standards of behaviour are not met.

As a student at the bpf, you are expected to uphold standards of behaviour that reflect the bpf's commitment to safeguarding, promoting ethical conduct, and upholding the key values of inclusion, integrity and accountability.

By registering as a student, you are agreeing to our standards of behaviour and shared values and commit to engaging in the processes within this Code of Conduct when asked to do so. Students are expected to read this document in conjunction with our [The analytical and ethical stance of a bpf trainee](#), as both documents together provide a comprehensive framework for ethical and professional behaviour within the bpf community. Students should also be aware of the British Psychoanalytic Council's (BPC's) Standards of Conduct, Practice and Ethics and/or the Association of Child Psychotherapists (ACP) Code of Professional Conduct depending on the training that they are undertaking.

This Code of Conduct (known as 'Code') lays out the steps that will be taken when those standards of behaviour are not met, and is designed to uphold a safe, respectful, and inclusive culture where each person can reach their potential without risk of harm.

The Code commits to managing allegations in a fair, proportionate, confidential and timely manner, allowing support and representation during the process.

This Code was developed in partnership with a range of stakeholders to represent the values of the bpf.

Our standards of behaviour

We expect that you:

- Treat others with respect, courtesy, and cooperation in all interactions.
- Uphold professional conduct and appropriate boundaries when working with others.
- Protect confidentiality and share information responsibly and only when appropriate.
- Act safely and responsibly, taking care not to endanger the health, safety or wellbeing of yourself or others.
- Demonstrate honesty and integrity in all actions.
- Safeguard the reputation of the bpf and profession through responsible behaviour both within and outside the community.
- Comply with precautionary measures designed to manage risk and protect wellbeing.

Examples of the kinds of behaviour that may be considered in accordance with this Code are:

1. Behaviour, which is disrespectful, rude or obstructive, including behaviour which unreasonably disrupts or interferes with teaching, research or operations of the bpf.
2. Disorderly, violent, threatening or intimidating behaviour.
3. Any form of sexual misconduct, including any conduct of a sexual nature that is without consent.
4. Incidents or behaviour of bullying and/or harassment that have the cause or effect of undermining the dignity of others, or behaviour which is unwanted, intimidating, excludes, discriminates against or demeans individuals or groups, including actions or speech targeted against protected characteristics (hate incidents).
5. Sharing confidential information inappropriately.
6. Behaving in a manner that is dangerous or likely to cause injury or harm, including tampering with safety equipment, failing to evacuate or creating hazardous conditions.
7. Inappropriate alcohol and substance use including underage drinking, public intoxication, or intoxication in professional settings.
8. Possession, use or supply of controlled drugs.
9. Possession, use or supply of any offensive weapons.
10. Misrepresentation including fraud, forgery or making false statements.
11. Stealing or damaging property of the bpf or others.
12. Behaviour which may harm the reputation of the institution, including being convicted of a crime.
13. Aiding or assisting another in violating the Code.
14. Offering or accepting bribes or favours for the purposes of undue influence.
15. Malicious, vexatious or false complaints.
16. Failing to comply with precautionary measures imposed to manage risk.
17. Any behaviour which may bring the reputation of the bpf or related profession into disrepute.
18. Any other behaviour which is deemed to contravene the principles and values of the bpf.

Our Rights and Responsibilities

The bpf has the right to:

- Set expected standards of behaviour that reflect professional, ethical, and community values.
- Intervene when behaviour falls short of expectations, using fair and transparent processes, whether this behaviour takes place in person, online or by other means.
- Safeguard the standing and reputation of the bpf by upholding these standards.

Alongside these rights, the bpf has the responsibility to:

- Model the values and standards of behaviour laid out in the Code.
- Provide guidance to help individuals meet behavioural expectations.
- Apply the Code consistently and transparently.
- Review and update the Code regularly to ensure it remains fit for purpose.

Conferral / award of credit or qualifications for formal stage cases

If you are a reported party in conduct proceedings, the bpf reserves the right to withhold the award of credit or qualifications until the proceedings are complete, where it is relevant and proportionate to do so. This applies for the entirety of the process, including the appeal stage.

Any decision to withhold the award of credit or qualifications is final.

This Code should be read and interpreted in conjunction with our [student policies and regulations](#).

Scope

The Code applies to all students (who may otherwise be known as a 'trainee' who have registered and enrolled in a programme of study at the bpf). This includes students who are undertaking a formal qualification, an infant observation as well as those who are completing programmes of continuous professional development. This Code applies to students who are undertaking a formal qualification which we are delivering in partnership with another educational provider.

The bpf may choose to investigate allegations of misconduct that occur on its premises, on partner sites, on placements, or within the community. As such, the bpf may take action in accordance with this Code whenever or wherever the alleged behaviour has taken place, when it is considered necessary.

The bpf maintains the right to:

- exercise judgement when considering whether action should be taken in accordance with this Code, or another procedure.
- take disciplinary action against you for the behaviour of your guests when on bpf property.
- decide if behaviours fall outside the scope of this Code.

This Code lays out the process by which a range of allegations may be managed, ranging from reports of minor behaviour infractions to allegations of serious misconduct.

This Code is not a legal process, and legal representatives are not permitted at any stage.

When your course is delivered in partnership with another educational institution

If you are undertaking a course or programme of study which is being delivered by the bpf in partnership with another educational institute, such as Birkbeck (University of London), University College London (UCL) or the Anna Freud Centre, allegations and investigations will be considered in conjunction with the respective policy of that educational institute.

The bpf may share information that is proportionate to an allegation or investigation with the relevant educational partner for the purpose of consideration and response.

Fitness to Practice

If you are registered on a course where a professional placement is undertaken, or if you are seeing training patients in clinical practice as part of your programme of study, you have additional responsibilities to act in a way that meets professional and ethical standards, and to demonstrate that you are in good standing.

Actions taken under this Code may be suspended for consideration of the complaint in accordance with the Fitness to Practice procedure. Any decision to suspend proceedings under this Code will be kept under regular review to ensure that the period of any suspension is kept to a minimum.

We may refer a case for consideration by any statutory and/or professional regulatory body, such as the British Psychoanalytic Council (BPC) or the Association of Child Psychotherapists (ACP). In some cases, it may be appropriate for processes to run concurrently, with some behaviours being referred to Fitness to Practice while others are managed under this Code.

Criminal proceedings

Where alleged misconduct may also constitute a criminal offence, the bpf will consider carefully how to proceed. Disciplinary action under this Code is distinct from any criminal process and does not require a criminal conviction. However, the bpf may normally pause or suspend its own proceedings if continuing would prejudice a police investigation or criminal trial. Precautionary measures may be imposed to manage risk during this period, and these will be reviewed regularly to ensure they remain proportionate. If criminal proceedings conclude, the bpf may resume or initiate action in accordance with this Code, applying the standard of proof on 'balance of probability'. Students will be kept informed of decisions, timescales, and the relationship between internal and external processes, and both complainants and reported students will be supported throughout.

Mental health, illness or disability

If you believe that your behaviour may have been impacted by your mental health, health or disability, consideration will be given as to whether proceedings should be:

- Suspended until a judgement is made that it is appropriate to continue,
- Referred to be managed under another procedure such as Support to Study,
- Any other action deemed appropriate.

In some circumstances, it may be possible to carry out concurrent proceedings under both this Code and Support to Study, with appropriate support in place, for example in circumstances where:

- Delaying proceedings will cause disproportionate distress or impact,
- Delaying proceedings may cause risk of harm to yourself, others or property.

Any decision to suspend proceedings under this Code will be kept under regular review to ensure that the period of any suspension is kept to a minimum.

Personal circumstances, including those based on mental health or illness, can be considered as mitigating factors when imposing penalties for proven misconduct but do not prevent conduct being investigated or found proven.

Support available

You have the right to have someone with you to act as a representative and support you through the Code of Conduct process. They may be a member of staff, a fellow student, a family member or friend. The representative should not have been involved in the case at any time. Other than those listed above, you may not bring anyone else with you to the meeting unless this has been pre-approved as a reasonable adjustment under the Equality Act 2010.

Students who are undertaking a course or programme of study which is being delivered in partnership with Birkbeck (University of London) or UCL may wish to contact the Students' Union or student wellbeing services at those universities for further advice or support.

You are required to engage in the processes laid out in this Code in your own words. A representative should not speak on your behalf, unless this has been pre-approved as a reasonable adjustment under the Equality Act 2010 and/or you can demonstrate that you would otherwise be at a disadvantage which may have material affect.

Standard of Proof

The standard of proof applied in this Code is 'a balance of probabilities'. This means that, upon objective review of the evidence, a decision is made whether it is more likely than not the alleged misconduct occurred.

2. Making a report

If you are the complainant of, or witness to, misconduct which may constitute a breach of this Code, you should report the incident to a member of staff. For example, this might be your tutor, seminar leader, Training Manager or Director of Training or Chair of Training Committee.

On receipt of your report, we will acknowledge your report and signpost you to support available to you. We will consider if any immediate precautionary measures are required to manage risk, and whether the report should be considered under this or any other relevant policy. If your report should be considered under this policy, we may decide it is eligible for early resolution.

If your report meets the threshold for consideration under this Code, you will be informed of next steps and kept up to date with the progress of your case. If your report does not meet the threshold, you will be informed of this and signposted to other support available to you.

It may not be possible to proceed with anonymous reports as the Code is an evidence-based process which relies on the ability to gather, examine and make an objective inquiry into the incidents reported. The bpf maintains the right to exercise judgement when considering whether action should be taken in accordance with this Code for anonymous complaints.

Complaints raised by third parties are not normally accepted, apart from where the person has made a compelling case for exceptional consideration. The bpf maintains the right to exercise judgement when considering whether action should be taken in accordance with this Code for third party complaints.

Withdrawing a report

You may choose to withdraw a complaint at any point in the process, up until a decision has been made. The bpf reserves the right to continue with its processes where deemed necessary to protect others from harm or to prevent reputational damage.

Timescales

We aim to conclude proceedings as quickly as possible, and normally within 40 working days.

In certain circumstances – particularly cases involving serious or complex allegations, or where criminal proceedings are ongoing – it may be necessary to extend the timeframe for good reason. In such cases, you will be kept notified of the reason and provided with regular updates on progress.

3. Informal Stage

Early Resolution Process

Where an allegation is minor and can be resolved promptly, a report may be resolved via an early resolution process.

This may involve:

- Writing to you to notify you of the complaint/s and asking you to reflect upon and/or change your behaviour.
- Asking you to apologise for certain behaviours or incidents.
- Asking you to pay for minor damage.
- Presenting you with an informal warning.
- Ordering you to have no further contact – or restricted contact - with a named individual or individuals online, in person or indirectly.

In cases deemed appropriate for early resolution, your case will be allocated to the Director of Training or Chair of Training Committee (or their nominee) for your course, who will notify you of the complaint, a recommended outcome, and provide you with an opportunity to accept the allegation and the recommended outcome.

If you do not accept the allegation or recommended outcome, a decision may be taken to progress to an investigation under the formal stage of this Code.

All early resolution outcomes will be held on your student records for the duration of your studies and retained in accordance with our data retention policy.

If you are reported for multiple minor allegations, a decision may be taken to refer you to the formal stage.

4. Formal Stage

Precautionary measures

When a report of serious misconduct is received, an assessment will be undertaken to consider precautionary measures to manage risk.

This is not to assume guilt or impose any penalty. These measures are designed to protect parties from further allegations being made, to de-escalate circumstances, and to manage other potential risk.

Precautionary measures will be proportionate, timely and reviewed regularly (normally every 4 weeks) at which point they may be maintained, amended or lifted.

Examples of precautionary measures include, but are not limited to, the following:

- Being ordered not to communicate with certain individuals online, in person or indirectly,
- Temporary suspension from attending classes, examinations, clinical work, placements, or premises,
- Temporary suspension from infant observation, clinical services.
- Any other proportionate measure deemed necessary by the bpf to manage risk.

You can ask for a review of precautionary measures, for example to consider particular requests or needs. Your request will be reviewed, and you will be informed of the outcome. The bpf reserves the right to reject requests for changes to precautionary measures on the basis of risk assessment.

Failure to comply with precautionary measures imposed to manage risk may result in disciplinary penalties.

Investigation stage

An investigator with no prior involvement will be allocated to the case. The investigator will gather and review evidence relating to the reported incident, and summarise the evidence gathered and the facts of the case.

You may be asked to attend a meeting with the investigator. While the investigator will take into account periods of time where your availability may be limited, it should take priority over other commitments. You must inform the investigator if you are unable to attend due to illness or unforeseen circumstances.

If you do not attend a meeting with the investigator, agree an alternative time in advance or fail to attend meetings, the investigation may proceed without you, and a decision will be made on the basis of the evidence to hand. It is your responsibility to engage in the proceedings.

On completion of the investigation, the investigator will produce a summary of

- The allegations
- The evidence gathered
- The finding of facts
- A recommendation on next steps

This summary will be referred to Director of Training or Chair of Training Committee (or their nominee) of your course for a decision on next steps, and they will decide whether:

- There is insufficient evidence, so the case is dismissed.
- There is evidence of a breach resulting in a penalty imposed by the investigator.
- There is evidence of a serious breach which should be escalated to a Conduct Review Panel.
- There is evidence of a serious breach which should be escalated to a Conduct Review Hearing.

Penalties available to the investigator for proven misconduct

More than one penalty may be imposed for each breach.

- a) Requiring you to apologise for certain behaviours or incidents.
- b) Requiring you to pay for damage or make financial compensation.
- c) Presenting you with an informal warning.
- d) Ordering you to have no further contact – or restricted contact - with a named individual or individuals online, in person or indirectly.
- e) Imposing a formal written warning.
- f) Requiring you to attend a workshop and pay a reasonable cost for you to do so.
- g) Comply with an action plan, behaviour agreement or training need within a set timeframe.
- h) Comply with multi partner action to review your progress and take action to address their concerns within a set timeframe.
- i) Any other proportionate action.

5. Conduct Review Panels and Hearings

Conduct Review Hearings are reserved for the most serious and complex cases, while Conduct Review Panels are intended to allow for serious allegations of lesser complexity or severity to be reviewed efficiently and promptly where appropriate. In addition, a pattern of repeated minor misconduct may be referred to a Conduct Review Panel when problematic behaviours have not been resolved at an earlier stage.

The membership of review panels and hearings will be selected to ensure, as far as possible, appropriate diversity to reflect the organisation and student body, and may include a member from a partner institution or placement. The membership will include members with no prior involvement in the case.

Prior to a Conduct Review Panel or Hearing you will be asked to confirm whether:

- you intend to attend the meeting.
- you accept or deny the allegations.
- you have any objections to the membership of the panel or hearing.
- you will be submitting any additional representations or mitigation.
- you will be making a request for reasonable adjustments, additional consideration or to have a representative with you.

You should not submit new evidence at this stage, unless you can provide an exceptional reason why this evidence was not provided during the investigation stage. Whether this evidence is admitted is at the discretion of the Chair and their decision is final. Late requests will not normally be approved.

The reported student and complainant will be informed separately of the decision of the Review Panel or Hearing. The outcome will also be provided in writing, alongside information about your right of appeal.

All Review Panel or Review Hearing outcomes will be held on your student records for the duration of your studies and retained in accordance with our data retention policy.

Postponing a Review Panel or Hearing

A Review panel or Hearing may be postponed in the following circumstances, at the discretion of the Chair. The Chair's decision is final.

- To enable the complainant, reported person, key witness or representative to be present.
- To enable the Review Panel or Hearing to gather further evidence which is critical to the case.
- To enable the parties to prepare a response to a potential alternative or additional allegation or outcome.
- The proceedings are impeded due to circumstances beyond its control, for example unavoidable and critical technical error in cases where the Review Panel or Hearing was due to take place online.

A postponed case should normally be rescheduled within 20 working days.

If the membership of the Review Panel or Hearing is significantly altered due to availability, a member of the Senior Management Team may determine that a new Review Panel or Hearing should be convened, and the proceedings should start again.

Conduct Review Panel

A Conduct Review Panel will consist of no less than 3 members who have had no prior involvement in the case and who may include:

- Director of Training or Chair of Training Committee
- Ethics & Professional Standards Committee member
- Member of Senior Management Team
- Manager relevant to the complaint
- External qualified member of the bpf
- Representative from educational partner
- Notetaker

The Chair will have the casting vote.

Students are not required to attend a Review Panel, and no negative interpretation will be drawn from your decision not to attend. The decision will be made on the evidence to hand in the case file, including the student's reply to the allegations.

Penalties available to a Conduct Review Panel for proven misconduct

More than one penalty may be imposed for each breach.

- a) Requiring you to apologise for certain behaviours or incidents.
- b) Requiring you to pay for damage or make financial compensation.
- c) Requiring you to engage with attendance, engagement or progression meetings.
- d) Ordering you to have no further contact – or restricted contact – with a named individual or individuals online, in person or indirectly.
- e) Imposing a formal written warning.
- f) Requiring you to attend a workshop and pay a reasonable cost for you to do so.
- g) Comply with an action plan, behaviour agreement or training need within a set timeframe.
- h) Comply with multi partner action to review your progress and take action to address their concerns within a set timeframe.
- i) Temporary or permanent exclusion from certain premises, classes, clinical work or placements.
- j) Suspended withdrawal from your studies. This means if you are referred to a Conduct Hearing in future, you may be withdrawn.
- k) Recommendation to a Conduct Review Hearing that you are permanently withdrawn from your studies.
- l) Any other proportionate action.

In cases where a case is found not proven, the Chair retains the right to impose an order that you are to have no further contact – or restricted contact – with a named individual or individuals online, in person or indirectly.

All formal stage outcomes will be held on your student records for the duration of your studies and retained in accordance with our data retention policy. Penalties will not normally last beyond the duration of your studies, apart from permanent withdrawal from your studies (expulsion).

Conduct Review Hearing

A Conduct Review Hearing will consist of no less than 3 members who have had no prior involvement in the case and who may include:

- External qualified member of the bpf
- Representative from the BPC / ACP as nominated by the Chair of the Hearing
- Member of the Board of Trustees or ARC
- Representative from educational partner
- Student representative
- Notetaker

The Chair will have the casting vote.

Students are normally required to attend a Review Hearing.

Penalties available to a Conduct Review Hearing for proven misconduct

More than one penalty may be imposed for each breach.

- a) Requiring you to apologise for certain behaviours or incidents.
- b) Requiring you to pay for damage or make financial compensation.
- c) Requiring you to engage with attendance, engagement or progression meetings.
- d) Ordering you to have no further contact – or restricted contact - with a named individual or individuals online, in person or indirectly.
- e) Imposing a formal written warning.
- f) Requiring you to attend a workshop and pay a reasonable cost for you to do so.
- g) Comply with an action plan, behaviour agreement or training need within a set timeframe.
- h) Comply with multi partner action to review your progress and take action to address their concerns within a set timeframe.
- i) Temporary or permanent exclusion from certain premises, classes, clinical work or placements.
- j) Suspended withdrawal from your studies. This means if you are referred to a Conduct Hearing in future, you may be withdrawn.
- k) Permanent withdrawal from your studies (expulsion).
- l) Any other proportionate action.

In cases where a case is found not proven, the Chair retains the right to impose an order that you are to have no further contact – or restricted contact - with a named individual or individuals online, in person or indirectly.

All formal stage outcomes will be held on your student records for the duration of your studies and retained in accordance with our data retention policy. Penalties will not normally last beyond the duration of your studies, apart from permanent withdrawal from your studies (expulsion).

6. Appeal

Grounds for an appeal

You have the right to appeal against a finding made by a conduct investigator, Conduct Review Panel or Conduct Review Hearing on the following grounds:

1. There is new evidence which was not previously available but may have materially affected the outcome. You must be able to provide a good reason for why this evidence was not provided earlier or you do not have grounds for appeal.
2. You have evidence of a procedural irregularity in the handling of your case. You must specify the procedural irregularity in your application.
3. There is evidence of prejudice or bias in the investigation or decision making. You must specify the alleged prejudice or bias in your application.
4. On the balance of probabilities, the facts of the case did not justify the decision reached. You must explain your reasoning in your application.

Process for making and withdrawing an appeal

You must write to the Corporate Governance Team setting out your grounds for appeal and supporting evidence. You must submit an appeal within ten working days of receiving written notification of the outcome. Late submissions may not be accepted unless you can demonstrate exceptional circumstances which delayed your submission. Late submissions can only be accepted on the discretion of a member of the Senior Management Team (or nominee), and their decision is final.

You may withdraw your appeal at any time up until a decision has been reached, in which case the original decision will stand.

The CEO (or nominee) will review your appeal or appoint someone to do so on their behalf as a nominee. The bpf will let the other party know that an appeal is under consideration. They will assess your appeal to determine whether the reasons you've provided meet the published criteria. If your appeal does not meet these criteria and is unsuccessful, both parties will be notified of the outcome. This decision is final.

Potential appeal outcomes

If it is agreed that the grounds for appeal have been met, one of the following outcomes will be reached:

1. Overturn the decision of the investigator and any associated penalties.
2. Uphold the decision of the investigator and any associated penalties.

3. Uphold the decision of the investigator but adjust the penalty in accordance with this Code. Please note that the penalty may be increased or reduced.

If a decision was made by a Conduct Review Panel (Appeal) or Hearing (Appeal), your case may be:

1. Upheld along with associated penalties.
2. Referred back to a Conduct Review Panel (Appeal) or Conduct Review Hearing (Appeal) for consideration.

The Review Panel (Appeal) or Hearing (Appeal) may:

1. Overturn the decision of the previous panel or hearing and any associated penalties.
2. Uphold the decision of the previous panel or hearing and any associated penalties.
3. Uphold the decision of the previous panel or hearing but adjust the penalty in accordance with this Code. Please note that the penalty may be increased or reduced.

You must attend a Review Panel (Appeal), or Hearing (Appeal) or your appeal will be considered withdrawn.

The reported student and complainant will be informed separately of the decision of the Review Panel or Hearing. The outcome will also be provided in writing.

Internal review

If you are not satisfied with the outcome of your appeal, you may submit a request for an internal review on the grounds of procedural irregularity only. You must set out your case in writing, with supporting evidence within ten working days of your appeal panel or hearing.

If the grounds are not met, you will be informed that your internal review request was unsuccessful which concludes these procedures. If it is determined that you have met the grounds, your case may be referred back to a Review Panel (Appeal) or Hearing (Appeal).

Confidentiality and data

Information will not be shared routinely or unnecessarily and will be treated with strict confidentiality.

In some circumstances it may be necessary to share information, for example to manage risk or to comply with the law. Where information is shared, it will only be shared with relevant and appropriate persons and will be limited to a level of detail which is necessary or required, or in accordance with data sharing agreements.

All persons involved in a case are expected to behave with dignity and uphold the confidentiality of others involved. You should not disclose information about the case where it is inappropriate to do so. Sharing information inappropriately may result in disciplinary action in accordance with this Code.

Data is stored in accordance with our data retention policy. Data may be used in anonymised case studies for the purposes of training, enhancement or recording precedent.

Office for the Independent Adjudicator

The Office for the Independent Adjudicator (OIA) is the independent body set up to review students' complaints. If a student has raised a complaint to the bpf and they are unhappy with the outcome of their complaint and they are, or were, on one of our higher education courses, they can ask the OIA to review their complaint. It's important that the bpf have completed all of their internal processes, and that the student has been issued with a Completion of Procedures Letter, before the student can take their complaint to the OIA. The request to the OIA must be submitted within 12 months of outcome of the complaint.

The OIA Scheme applies to the following higher education courses which are delivered by the bpf:

- Doctor of Child and Adolescent Psychotherapy
- MSc in Psychodynamics of Human Development

More information about making a complaint to the OIA Scheme can be found on the OIA's website <https://www.oiahe.org.uk/students>.

Governance

The Corporate Governance Team will provide an annual assurance report about the application of our Code of Conduct for Students to bpf's Audit and Risk Committee and Board of Trustees. The bpf reserves the right to use anonymised data and case studies for the purposes of policy or service review, identifying and responding to trends, or to inform training and quality improvement.

Internal resources

Students may wish to refer to our [student policies and regulations](#).

External resources

University College London

<https://www.ucl.ac.uk/>

Birkbeck, University of London

<https://www.bbk.ac.uk/>

Version	Date	Description of Amendments	Author
V1	08.01.2026		Skill Solutions Head of Safeguarding & Professional Standards Development

Appendix 1 – Code of Conduct Regulations

The regulations are a list of behaviours which may result in disciplinary action being taken, along with example penalties. Please note this is illustrative and not exhaustive.

This applies to conduct both in person and online, and breaches in either context may be treated as violations of this code.

Mitigating and aggravating factors

Mitigating and aggravating factors will be considered when imposing penalties.

Mitigating factors are factors which make your misconduct less serious or may reduce the penalty due to extenuating circumstances. These may include, for example, no prior misconduct, severe personal circumstances. Extenuating circumstances can be considered as mitigation when imposing penalties for proven misconduct, but do not prevent your conduct being investigated or found proven.

Aggravating factors are factors which make your misconduct more serious or may increase the penalty. These may include, for example, intent or premeditation, previous and/or repeated misconduct, attempts to mislead or obstruct and investigation or destroy evidence, abuse of position or trust, failure to comply with precautionary measures imposed to manage risk, damage to the reputation of the institution or profession, failure to engage with these processes, or the severity of the harm caused to others.

Standards of behaviour

1. Behaviour which is disrespectful, rude or obstructive, including behaviour which unreasonably disrupts or interferes with teaching, research or operations of the bpf.
2. Disorderly, violent, threatening or intimidating behaviour.
3. Any form of sexual misconduct, including any conduct of a sexual nature that is without consent.
4. Incidents or behaviour of bullying and/or harassment that have the cause or effect of undermining the dignity of others, or behaviour which is unwanted, intimidating, excludes, discriminates against or demeans individuals or groups, including actions or speech targeted against protected characteristics (hate incidents).
5. Sharing confidential information inappropriately.
6. Behaving in a manner that is dangerous or likely to cause injury or harm, including tampering with safety equipment, failing to evacuate or creating hazardous conditions.
7. Inappropriate alcohol and substance use including underage drinking, public intoxication, or intoxication in professional settings.
8. Possession, use or supply of controlled drugs.
9. Possession, use or supply of any offensive weapons.
10. Misrepresentation including fraud, forgery or making false statements.
11. Stealing or damaging property of the bpf or others.

12. Behaviour which may harm the reputation of the institution, including being convicted of a crime.
13. Aiding or assisting another in violating the Code.
14. Offering or accepting bribes or favours for the purposes of undue influence.
15. Malicious, vexatious or false complaints.
16. Failing to comply with precautionary measures imposed to manage risk.
17. Any behaviour which may bring the reputation of the bpf or related profession into disrepute.
18. Any other behaviour which is deemed to contravene the principles and values of the bpf.

Example penalties

Behaviour	Example penalty
Behaviour which is disrespectful, rude or obstructive, including behaviour which unreasonably disrupts or interferes with teaching, research or operations of the bpf.	Apology, no contact, warning, behaviour agreement or action plan, temporary or permanent exclusion from premises, suspended withdrawal from studies, permanent withdrawal from your studies (expulsion).
Disorderly, violent, threatening or intimidating behaviour.	Apology, no contact, warning, behaviour agreement or action plan, temporary or permanent exclusion from premises, suspended withdrawal from studies, permanent withdrawal from your studies (expulsion).
Any form of sexual misconduct, including any conduct of a sexual nature that is without consent.	Apology, no contact, warning, behaviour agreement or action plan, temporary or permanent exclusion from premises, workshop, suspended withdrawal from studies, permanent withdrawal from your studies (expulsion).
Incidents or behaviour of bullying and/or harassment that have the cause or effect of undermining the dignity of others, or behaviour which is unwanted, intimidating, excludes, discriminates against or demeans individuals or groups, including actions or speech targeted against protected characteristics (hate incidents).	Apology, no contact, warning, behaviour agreement or action plan, temporary or permanent exclusion from premises, workshop, suspended withdrawal from studies, permanent withdrawal from your studies (expulsion).
Sharing confidential information inappropriately.	Apology, no contact, warning, behaviour agreement or action plan, workshop, temporary or permanent exclusion from premises, suspended withdrawal from studies, permanent withdrawal from your studies (expulsion).

Behaviour	Example penalty
Behaving in a manner that is dangerous or likely to cause injury or harm, including tampering with safety equipment, failing to evacuate or creating hazardous conditions.	Apology, warning, behaviour agreement or action plan, workshop, temporary or permanent exclusion from premises, suspended withdrawal from studies, permanent withdrawal from your studies (expulsion).
Inappropriate alcohol and substance use including underage drinking, public intoxication, or intoxication in professional settings.	no contact, warning, behaviour agreement or action plan, temporary or permanent exclusion from premises, suspended withdrawal from studies, permanent withdrawal from your studies (expulsion).
Possession, use or supply of controlled drugs.	warning, behaviour agreement or action plan, workshop, temporary or permanent exclusion from premises, suspended withdrawal from studies, permanent withdrawal from your studies (expulsion).
Possession, use or supply of weapons.	warning, behaviour agreement or action plan, temporary or permanent exclusion from premises, suspended withdrawal from studies, permanent withdrawal from your studies (expulsion).
Misrepresentation including fraud, forgery or making false statements.	Apology, no contact, warning, behaviour agreement or action plan, temporary or permanent exclusion from premises, suspended withdrawal from studies, permanent withdrawal from your studies (expulsion).
Stealing or damaging property of the bpf or others.	no contact, warning, behaviour agreement or action plan, temporary or permanent exclusion from premises, suspended withdrawal from studies, permanent withdrawal from your studies (expulsion).
Behaviour which may harm the reputation of the institution, including being convicted of a crime.	behaviour agreement or action plan, temporary or permanent exclusion from premises, suspended withdrawal from studies, permanent withdrawal from your studies (expulsion).
Aiding or assisting another in violating the Code.	no contact, warning, behaviour agreement or action plan, temporary or permanent exclusion from premises, suspended withdrawal from studies, permanent withdrawal from your studies (expulsion).
Offering or accepting bribes or favours for the purposes of undue influence.	no contact, warning, behaviour agreement or action plan, temporary or permanent exclusion from premises, suspended withdrawal from studies, permanent withdrawal from your studies (expulsion).

Behaviour	Example penalty
Failing to comply with precautionary measures imposed to manage risk.	no contact, warning, behaviour agreement or action plan, temporary or permanent exclusion from premises, suspended withdrawal from studies, permanent withdrawal from your studies (expulsion).
Malicious, vexatious or false complaints.	Apology, no contact, warning, behaviour agreement or action plan
Any behaviour which may bring the reputation of the bpf or related profession into disrepute.	no contact, warning, behaviour agreement or action plan, temporary or permanent exclusion from premises, suspended withdrawal from studies, permanent withdrawal from your studies (expulsion).
Any other behaviour which is deemed to contravene the principles and values of the bpf.	Any proportionate action.

Appendix 2 – Definitions

Aggravating factors	Circumstances or elements that make an offence or breach more serious and may lead to a harsher penalty or sanction.
Balance of Probabilities	It is more likely than not that the reported behaviour occurred on objective consideration of the known facts.
Bullying	Repeated, intentional behaviour that seeks to harm, intimidate, or undermine another person or persons.
Conflict of interest	Any situation where personal interests or relationships could interfere with professional duties, decision making, or responsibilities.
Consent	<p>A person freely agrees by choice and has both the capacity and freedom to make that decision. It must be given explicitly each time. Consent may apply to one type of activity but not another, and it can be withdrawn at any time.</p> <p>Consent is not valid if someone is:</p> <ul style="list-style-type: none"> • Scared or threatened. • Bullied or pressured. • Incapacitated through alcohol or drugs. • Asleep or unconscious. <p>Consent cannot be assumed based on past experiences or previously given consent.</p>
Expulsion	<p>Permanent withdrawal making a person ineligible to be registered for a programme of study, or to have an award conferred upon them.</p> <p>Earned credits ratified by the Board of Examiners will be recorded on the student's transcript. Students expelled following conduct proceedings are not entitled to a refund.</p>
Harassment	Harassment is unwanted behaviour that violates the dignity of a person or group, creating an intimidating, hostile, degrading, humiliating, or offensive environment. It can be verbal, physical, written, or online.
Hate incident	A hate incident is any act, behaviour, or expression that is perceived by the victim or others to be motivated by hostility, prejudice, or bias against a person's protected characteristic (such as race, religion, disability, sexual orientation, gender identity, or other legally recognised categories). It can be verbal, physical, written, or online.
Investigator	An appropriately trained person who acts as investigator in accordance with the Code. An investigator for the early resolution and formal stage may typically be the Head of Training, Chair of the

	Training Committee, a Training Manager, or any other person nominated by the Senior Management Team.
Mitigating factors	A circumstance or consideration that does not excuse misconduct but may reduce its perceived seriousness or the level of penalty applied.
Nominee	A representative given authority to make decisions or take action on behalf of another.
Offensive Weapon	Any object designed, adapted, or carried with the intention of causing injury or damage, and which has no legitimate everyday purpose.
Vexatious complaint	Submitting a complaint without sufficient grounds, with the purpose of causing inconvenience, annoyance, disruption or distress.

Appendix 3 – Order of Proceedings

Review Panel

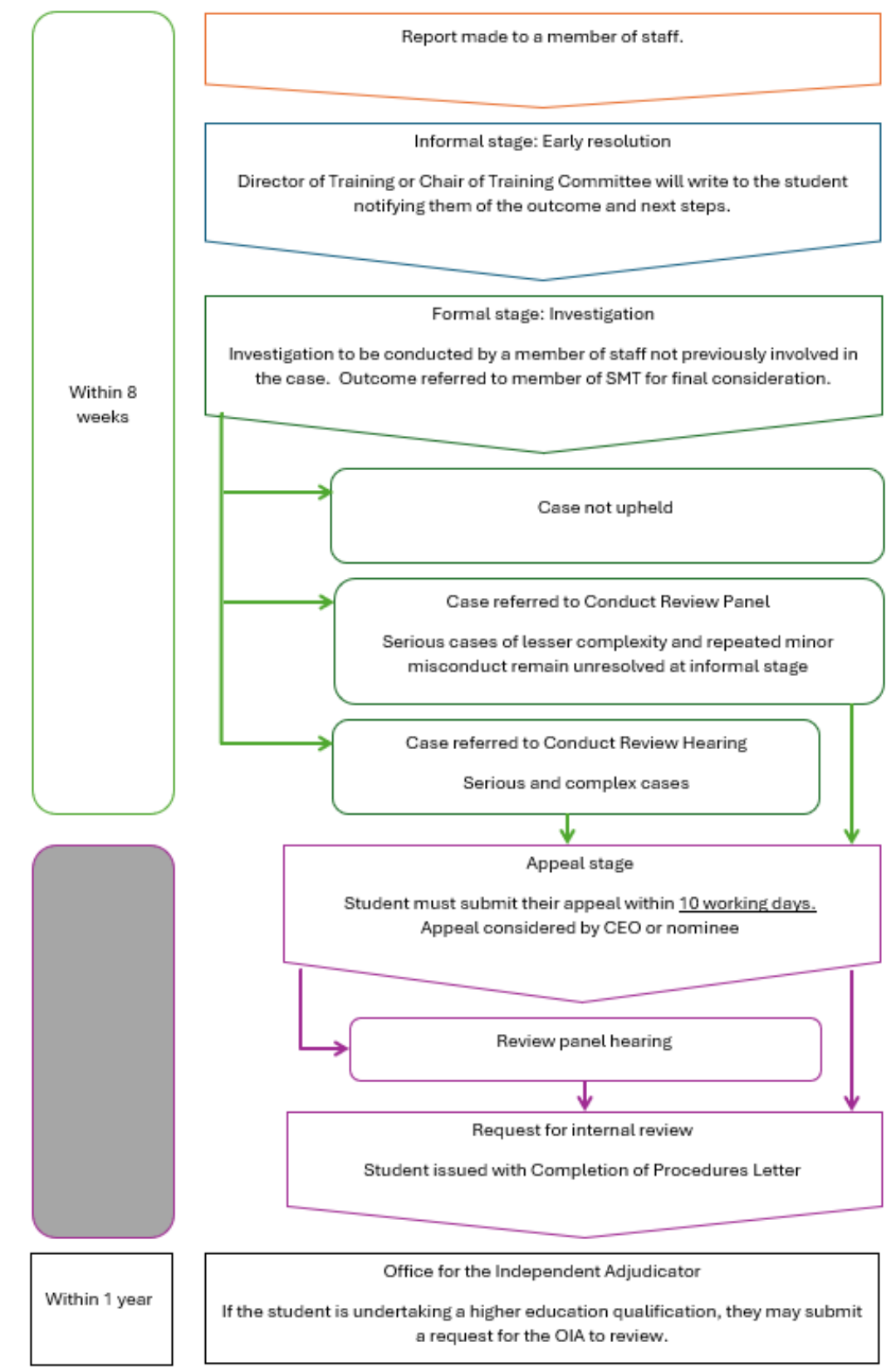
1. The Chair opens the meeting, confirms a formal record is being taken, and sets out the purpose of the meeting and which cases will be considered by the Review Panel.
2. The panel deliberate the case to determine if there has been a breach of the Code, consider any mitigating or aggravating factors, and impose a penalty or penalties where relevant.
3. The outcome is communicated to the reporting and reported parties (and their representatives, where relevant) in writing.

Hearing or appeal hearing

1. Proceedings can be adapted to take into account reasonable adjustments or pre-approved alternative arrangements.
2. The Chair opens the meeting, confirms a formal record is being taken, and sets out the purpose of the meeting, along with any house keeping arrangements.
3. The investigator briefly summarises the allegations, the findings of the investigation, and any evidence they have gathered when considering whether there has been a breach of the regulations of the Code.
4. The Chair facilitates questions relating to the investigator's statements.
5. The reporting party is invited to make a statement. This should not repeat the information discovered by the investigator but may be used to highlight particular elements of the case to the hearing. This may include calling witnesses to give testimony or answer questions.
6. The Chair facilitates questions relating to the reporting party's statements.
7. The reported party is invited to make a statement. This should not repeat the information discovered by the investigator but may be used to highlight particular elements of the case to the panel. This may include calling witnesses to give testimony or answer questions.
8. The Chair facilitates questions relating to the reported party's statements.
9. The Chair confirms that all relevant information has been stated and there are no further questions.
10. The members deliberate in private to decide whether there has been a breach of the Code.
11. If the allegations are found proven, the Chair will inform the reported party, reporting parties (and, where relevant, their representatives) separately.
12. If the allegations are found proven, the reported party is asked to inform the panel of any mitigating factors. The investigator is asked to state any aggravating factors, including previous misconduct found proven.
13. The members deliberate in private to decide the penalty or penalties.
14. The Chair will inform the reported party, reporting parties (and, where relevant, their representatives) separately of the outcome, including the reasoning, aggravating and mitigating

factors considered, and penalty or penalties (where it is appropriate to share this with the reporting party).

Appendix 4: Student Code of Conduct: Timeline and process workflow



Accessible version of Student Code of Conduct: Timeline and process workflow

1. Process step 1: report made to a member of staff

2. Process step 2: Informal stage, early resolution

- Director of Training or Chair of Training Committee will write to the student notifying them of the outcome and next steps.

3. Process step 3: Formal stage: Investigation

- Investigation to be conducted by a member of staff not previously involved in the case.
- Outcome of the investigation will be referred to the member of the Senior Management Team for final consideration.
- Investigation outcomes:
 - a. Case not upheld;
 - b. Case referred to Conduct Review Panel. A review panel will consider serious cases of lesser complexity and repeated minor misconduct which remains unresolved an informal stage (step 2).
 - c. Case referred to Conduct Review Hearing. A review hearing will consider serious and complex cases.
- The bpf will aim to complete steps 1 to 3 within **8 weeks**.

4. Step 4: Appeal Stage

- Student must submit their appeal of the conduct investigation outcome within 10 working days.
- CEO or nominee will consider appeal.
- Appeal may be referred to Review panel hearing.

5. Step 5: Request for internal review

- Upon completion of Step 5, student issued with Completion of Procedures Letter.

6. Step 6: Office of the Independent Adjudicator

- If the student is undertaking a higher education qualification, they may submit a request for the OIA to review.
- The student must submit their request within **1 year** of the outcome of the appeal.

