

Student Fitness to Practise Policy and Procedure

This policy replaces the bpf's Student in difficulty Policy.

Purpose

The bpf is committed to safeguarding the wellbeing of students, staff and the wider community, including patients who are under the care of our students, and to upholding the integrity of psychotherapy training and practice.

Fitness to Practise is about the ability to meet professional standards and takes into consideration a student's character, professional competence and health. A student is considered fit to practise when they demonstrate:

- the knowledge, skills, and professional competence required for their stage of training.
- behaviour consistent with professional codes of ethics and conduct.
- insight, reliability, and emotional stability appropriate to therapeutic or professional work.
- the ability to engage safely and responsibly with clients, peers, and staff.
- physical and mental health sufficient to meet the demands of training and Practise, with reasonable adjustments where appropriate.

Our Fitness to Practise Policy sets out the standards and processes through which we ensure that students remain fit to practise within our training programmes.

Scope

Definition, requirements and expectations

The Fitness to Practise Policy (henceforth known as 'Policy') applies to all students (who may otherwise be known as a 'trainee') who have registered and enrolled in a qualifying training with the bpf, including the Foundation Course. This includes students who are undertaking modules and course components, such as infant observations and clinical placements, which form of the programme of study for a qualifying training. The Policy extends to a student's conduct within and outside of our organisation where it may reasonably impact professional suitability.

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

We have a duty:

- to ensure that students on a professional course are fit to practise in the psychotherapy profession, or will be when they complete the course
- to protect present and future patients, clients, service users and members of the public
- to safeguard public confidence in the profession
- to comply with the requirements of our regulatory bodies, including the British Psychoanalytic Council and the Association of Child Psychotherapists
- to ensure that students are not awarded a qualification that permits them to practise in psychotherapy if they are not fit to do so

This Policy should be read in conjunction with the following [bpf policies](#) and [external standards for registrants](#)

- The Analytical and Ethical Stance of a bpf trainee.
- Student Code of Conduct
- Additional Consideration Policy
- Support to Study Policy
- Standards of Conduct, Practice and Ethics (British Psychoanalytic Council)
- Code of Professional Conduct and Ethics (Association of Child Psychotherapists)

Examples of issues that may lead to fitness to practise concerns:

- academic misconduct (for example plagiarism, cheating in examinations, forging records)
- other disciplinary offences (for example anti-social, abusive or threatening behaviour, sexual misconduct, violence, bullying or harassment, damage to property, internet access abuse, substance or alcohol abuse)
- health and safety breaches
- failure to disclose convictions or other information that we require a student to disclose
- inaccurate or falsified placement documentation
- unsafe practise, incompetence, not following supervisory guidance or requiring too much supervision
- unprofessional behaviour, including:
 - lack of respect, aggressive or poor attitude, laziness
 - indiscipline, failure to follow dress code, inappropriate use of mobile phone, poor time keeping, poor attendance
 - failure to self-reflect, lack of insight
 - failure to engage with investigations into unprofessional behaviour
 - poor self-management, lack of personal accountability
 - dishonesty
 - breaking patient confidentiality

- not following course requirements
- behaviour away from the student's programme of study, including:
 - criminal conviction, such as violent or dishonest offence
 - disruptive behaviour in the community
 - inappropriate use of social media
- safeguarding concerns
- poor mental or physical health or serious physical impairment that interferes with the student's ability to practise safely
- failure to seek help or engage with appropriate services in relation to health issues
- poor communication or language skills
- as appropriate, standards set out in the BPC's Standards of Conduct, Practice and Ethics or the ACP's Code of Professional Conduct and Ethics not covered above

Supporting students to achieve fitness to practise

During the admissions process, student induction and, where appropriate, as part of a programme of study, we will take steps to ensure that applicants and students:

- are aware of what we require of them
- understand why professional standards are important and what this means for them.

Conferral / award of credit or qualifications for formal stage cases

If a student is subject to fitness to practise proceedings, we reserve 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.

Students who are already qualified and registered

If a student is already a registered psychotherapist, and where we have concerns about their fitness to practise, we have a responsibility to raise those concerns with the relevant professional body, such as the British Psychoanalytic Council or the Association of Child Psychotherapists.

When your course is delivered in partnership with another educational institution

When a student is undertaking a course or programme of study which is being delivered by the bpf in partnership with another educational institution, 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 the allegation or investigation with the relevant educational partner for the purpose of consideration and response.

Student Code of Conduct

If a student is subject to the bpf's Student Code of Conduct proceedings, actions taken under this Policy may be suspended for consideration of the complaint under the Student Code of Conduct procedure. Any decisions to suspend proceedings under this Policy will be kept under regular review to ensure that the period of any suspension is kept to a minimum.

Criminal proceedings

Where alleged misconduct may also constitute a criminal offence, we will consider carefully how to proceed. The bpf may normally pause or suspend our own proceedings if continuing would prejudice a police investigation or criminal trial. Precautionary measures may be imposed to manage risk during this period, which may include, but not be limited to:

- the suspension of the student
- requiring the student to pause clinical work.

We will review these measures regularly to ensure they remain proportionate.

If criminal proceedings conclude, we may resume or initiate action in accordance with this Policy, applying the standard of proof on 'balance of probability'. Students will be kept informed of decisions, timescales and the relationship between the internal and external processes and reported students, and other parties (where appropriate) who are involved in the case, will be supported throughout.

Mental health, illness or disability

Where a fitness to practise concern relates to a student's mental or physical health, or disability, we may consider reasonable adjustments to support the student's fitness to practise throughout all components of their programme of study, including clinical and practical placements.

If a student believes that their behaviour may have been impacted by their 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, for example when a student returns from a break in their studies
- delaying proceedings may cause risk of harm to the student, others or property.

Support available

Students have the right to have someone with them to act as a representative and support them through the Fitness to Practise 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, a student may not bring anyone else with them 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.

Students are required to engage in the processes laid out in this Policy in their own words. A representative should not speak on a student's behalf, unless this has been pre-approved as a reasonable adjustment under the Equality Act 2020 and/or the student can demonstrate that they would otherwise be at a disadvantage which may have material affect.

Standard of Proof

The standard of proof applied in this Policy 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.

Procedure

The bpf's Fitness to Practise procedure is set out in our [Fitness to Practise Procedure: Timeline and Process workflow \(Appendix A\)](#). We will make available guidance on our Fitness to Practise procedure to students, including what steps we may take and possible outcomes.

We will communicate our decisions and outcomes, providing clear reasons and rationale, at the completion of each step in the Fitness to Practise procedure.

Timeline

When a cause for concern that a student's fitness to practise may be impaired is reported, we will aim to complete our investigation and resolve the appeal promptly however more complex cases may take longer. We aim to complete our Fitness to Practise procedure within 90 calendar days of receiving the initial report. We require students to provide all information or evidence promptly and within any set deadlines. We will inform a student when it is not possible to meet our deadline.

Step 1: Preliminary stage (cause for concern)

Concerns about a students' fitness to practise should be raised with the Director of Training, or Chair of Training Committee (or nominee). Concerns about fitness to practise may be raised by: staff; tutors, supervisors, or placement providers; fellow students; patients or others associated with the student's programme of study; the student's psychotherapist or psychoanalyst (ACP-accredited courses); the student themselves.

Concerns should be raised promptly and be recorded in written form, providing clear examples of the behaviour or circumstances causing concern. Information on all concerns will be held securely and in accordance with our data retention policy.

At the preliminary stage, the Director of Training, or Chair of Training Committee (or nominee) will assess the concern to decide whether the student's fitness to practise may be in question, or whether the concern

is about less serious competency issues. The Director of Training, or Chair of Training Committee (or nominee) will:

- meet with the student to discuss the concerns that have been raised and provide the student with the opportunity to explain if there are circumstances that may be impacting their behaviour
- consider and agree supportive improvement measures with the student, setting out an action plan and timescale for reviewing actions and progress
- make clear to the student next steps if the student does not meet the improvements outlined in the action plan.

As an outcome of the preliminary stage, the Director of Training, or Chair of Training Committee (or nominee) may ask the student to demonstrate that they have the necessary insight into their behaviour or the issues leading to concerns about their fitness to practise. For example, this may include but not be limited to, that the student may be required to:

- submit a reflective piece of work
- provide written confirmation that they understand the behaviour policies, including the Analytical and Ethical Stance of a bpf trainee, the BPC's Standards of Conduct, Practice and Ethics or the ACP's Code of Professional Conduct and Ethics not covered above
- temporarily increase supervision
- attend regular meetings with, for example, the Director of Training, or Chair of Training Committee, or personal tutor

In the event of a serious concerns, the cause for concern should be escalated to Step 2 or Step 3. For example, this may be if the student has harmed, or is at risk of harming others, or if fitness to practise concerns have been raised as an outcome of a criminal conviction. If a student disputes the outcome of the preliminary stage, the cause for concern may also be escalated to Stage 2.

When immediate action is required during a fitness to practise investigation

In some situations, we may need to take immediate action, particularly when a student is on a practical placement, is seeing patients in a clinical setting or where they are undertaking an infant observation. This may include, but not be limited to, causes for concern when:

- cases involve a threat of serious harm to the student and/or others, including other students, staff, patients and others in the community;
- cases involve gross misconduct/serious incidences of unprofessional behaviour
- cases where a student has demonstrated unsafe practice
- cases where the student's mental health is at risk
- cases raising serious safeguarding concerns

In such situations, the case will be immediately referred to the bpf's CEO (or nominee) for consideration. Immediate decisions may include, but not be limited to, that the student:

- is temporarily suspended from attending classes, examinations, clinical work, placements, or premises
- temporary suspension from infant observations and clinical services

If the student is a qualified and practising psychotherapist, the bpf may report the case to the BPC or ACP in accordance with their fitness to practise policies and procedures.

Step 2: The formal stage

Precautionary measures

When a cause for concern is received, the Director of Training or Chair of Training Committee (or nominee) will carry out an assessment 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, that the student:

- is temporarily suspended from attending classes, examinations, clinical work, placements, or premises
- temporary suspension from infant observations and clinical services
- any other proportionate measure deemed necessary by the bpf to manage risk.

A student can ask for a review of precautionary measures, for example to consider particular requests or needs. Their request will be reviewed, and the student will be informed of the outcome. The bpf reserves the right to request for changes to precautionary measures on the basis of a 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 cause for concern, and summarise the evidence gathered and the facts of the case.

The student may be asked to attend a meeting with the investigator. While the investigator will take into account periods of time when the student's availability may be limited, it should take priority over other commitments. The student must inform the investigator if they are unable to attend due to illness or unforeseen circumstances.

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

- the allegations / cause for concern
- the process followed

- the evidence gathered
- the finding of facts
- a recommendation for next steps

This summary will be referred to the Director of Training or Chair of the Training Committee (or nominee) of students programme of study for decision on next steps, and they will decide whether:

- there is insufficient evidence, so the case is dismissed
- there is evidence of continued concern over the student's fitness to practise and further steps are required to provide assurance that the student's fitness to practise is not impaired. For example, this might include, but are not limited to:
 - that the student is required to attend analytic interviews with senior clinicians appointed by the bpf who would provide a report to the Director of Training / Chair of Training Committee
 - that the student is required to attend a Viva with the panel of representatives of the relevant training programme based around key competencies
 - any other steps deemed proportionate and necessary by the bpf.
- there is evidence that the student's fitness to practise may be impaired which should be escalated to a Fitness to Practise Panel Hearing

Step 3: Fitness to Practise Panel Hearing

Fitness to Practise Panel

Following the outcome of the investigation, and the decision of the Director of Training or Chair of the Training Committee (or nominee), recommends that there is evidence that the student's fitness to practise may be impaired, the bpf will convene a Fitness to Practise Panel. The role of the Panel is to consider whether the established facts lead to a genuine fitness to practise concern, and if so, what action should be taken.

Where a case has not been proven, the Panel will first establish the facts and allow the student to put forward the case in accordance with the bpf's Student Code of Conduct and disciplinary procedures.

The membership of the Fitness to Practise Panel 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 the Fitness to Practise Hearing, the student will be asked to confirm whether:

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

The student should not submit new evidence at this stage, unless they 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.

It is reasonable for the Panel to consider student's previous disciplinary and fitness to practise records, and if relevant, their health record, when determining the student's overall fitness to practise.

The outcome of the Hearing will be provided to the student in writing, alongside information about their right to appeal.

All Hearing outcomes will be held on the student's records for the durations of their studies and retained in accordance with our data retention policy.

Postponing a Fitness to Practise Hearing

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

- to enable the student, key witnesses or representatives to be present
- to enable the Panel 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 Hearing was due to take place online.

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

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

Fitness to Practise Panel membership

A Fitness to Practise Panel will consist of no less than 3 members who have had no prior involvement in the case, and include at least one Panel member will be professional with relevant expertise in fitness to practise issues, and who may include:

- External qualified member of the bpf
- Representative from the BPC / ACP as nominated by the Chair of the Panel
- Member of the Board of Trustees
- Ethics and Professional Standards Committee Member
- Representatives from an educational partner
- Notetaker
- The Chair will have the casting vote.

Students are normally required to attend a Hearing.

Outcomes and conditions available to the Fitness to Practise Panel

The possible outcomes of the Panel are that:

- The student's fitness to practise is not impaired, and the student may continue on their programme of study. The Panel may decide that the student is required to meet certain conditions and supportive improvement measures, setting out an action plan and timescale for reviewing actions and progress
- The student's fitness to practise is temporarily impaired, and the student may be required to temporarily interrupt their programme of study. The Panel would determine what conditions and supportive improvement measures the student would be required to meet prior to the student returning to their programme of study
- The student's fitness to practise is permanently impaired, and the student will be discontinued from their programme of study.

The decision as to what action the Panel can take should a student's fitness to practise is found to be impaired will usually require professional judgement.

The Panel may determine that it is appropriate and necessary for the student's placement provider to be informed of the outcome of the Hearing and any conditions imposed. Decisions to share information should not be delayed. The student may be asked for permission to share this information with the placement provider, and if permission is not granted, then the student may not be able to continue with their programme of study.

If the student is a qualified and practising psychotherapist, and the student's fitness to practise is found to be temporarily or permanently impaired, the bpf will report the outcome of the Hearing to the BPC or ACP in accordance with their fitness to practise policies and procedures.

Step 4: The Appeal Stage

Grounds for a appeal

The student has the right to appeal against a fitness to practise decision, including any action that the bpf has decided to take, in the following grounds:

- that the procedures were not followed properly
- that the decision maker(s) reached an unreasonable decision
- that the student has new material evidence that they were unable, for valid reasons, to provide earlier in the process
- that there was bias or reasonable perception of bias during the procedure
- that the action the provider has determined to take is disproportionate, or not permitted, under the procedures

We will consider appeals in against decisions taken in accordance with the appeals procedure in our Student Code of Conduct.

Whistleblowing

The bpf are committed to upholding professional standards, safeguarding and public confidence in psychotherapy training and practice, and encourages students and others to raise serious concerns in the public interest about wrongdoing, unsafe practice, or breaches of ethical or professional standards. They should do so without fear of reprisal and victimisation. Whistleblowing concerns are distinct from personal grievances or academic complaints and will be taken seriously and considered carefully.

Concerns should be raised with the Corporate Governance Team. Where this is not appropriate, for example, because they may be involved in alleged malpractice, wrongdoing or illegal acts or omissions, the concern should be raised with the bpf's Chief Executive Officer, or in their absence the Chair of the Board of Trustees.

Confidentiality and Record-Keeping

Information about fitness to practise concerns and casework will be kept confidential as far as possible. Information will only be disclosed to those who are involved in considering the case and any subsequent appeal, or where we are legally required to share information.

Where a previous fitness to practise concern has been raised about the students, this information may be taken into consideration when the bpf consider any subsequent concerns. Information will be stored securely and in accordance with the bpf's data retention policy.

If a student is already a registered psychotherapist, and where we have concerns about their fitness to practise, we have a responsibility to raise those concerns with the relevant professional body, such as the British Psychoanalytic Council or the Association of Child Psychotherapists.

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

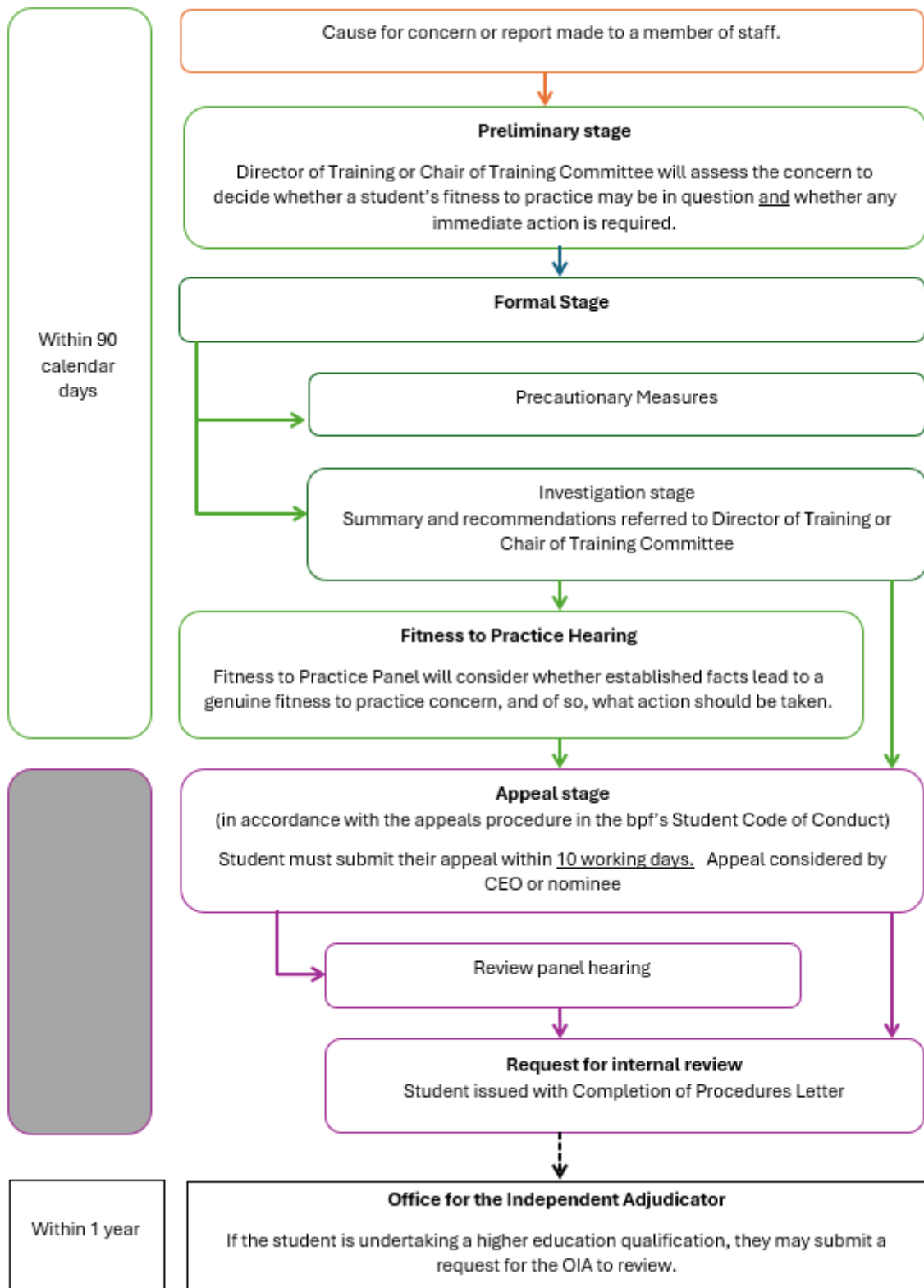
Students may wish to refer to our [student policies and regulations](#).

External resources

- University College London
<https://www.ucl.ac.uk/>
- Birkbeck, University of London
<https://www.bbk.ac.uk/>
- OIA Good Practice Framework: Fitness to Practise
<https://www.oiahe.org.uk/resources-and-publications/good-practice-framework/fitness-to-practise/>
- British Psychoanalytic Council
<https://www.bpc.org.uk/>
- Association of Child Psychotherapists
<https://childpsychotherapy.org.uk/>

Version	Date	Description of Amendments	Author
V1	23.03.2026		Head of Safeguarding & Professional Standards Development

Appendix 1: Fitness to Practise: Timeline and process workflow



Accessible version of Fitness to Practise: Timeline and process workflow

1. Process step 1: cause for concern or report made to a member of staff

2. Process step 2: Preliminary stage

- Director of Training or Chair of Training Committee will assess the concern to decide whether a student's fitness to practice may be in question and whether any immediate action is required.

3. Process step 3: Formal stage

- Precautionary measures
- Investigation stage. Summary and recommendations referred to the Director of Training or Chair of Training Committee

4. Process step 4: Fitness to Practice Hearing

- Fitness to Practice Panel will consider whether established facts lead to a genuine fitness to practice concern, and if so, what action should be taken.
- The bpf will aim to complete steps 1 to 4 within 90 calendar days.

5. Process step 5: Appeal stage (in accordance with the appeals procedure in the bpf's Student Code of Conduct).

- Student must submit their appeal within 10 working days.
- Appeal considered by CEO or nominee.
- Appeal may be referred to Review panel hearing.

6. Process step 6: Request for internal review

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

7. Step 7: 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.