



University College
of Osteopathy

Fitness to Practise & Professional Behaviour Policy

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Equality Impact					
Positive equality impact (i.e. the policy/procedure/guideline significantly reduces inequalities)					
Neutral equality impact (i.e. no significant effect)					X
Negative equality impact (i.e. increasing inequalities)					

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SECTION 1: INTRODUCTION

- 1.1 This policy relates to:
- a) The professional behaviour expected of students at the University UCO of Osteopathy (UCO);
 - b) Areas of misconduct and the sanctions available;
 - c) Health and disability;
 - d) The key elements in student fitness to practise arrangements.
- 1.2 As a pre-registration osteopathic student, you have certain privileges and responsibilities different from those of other students. Because of this, different standards of professional behaviour are expected of you. The UCO is responsible for ensuring that you have opportunities to learn and practise to the standards expected by the UCO.
- 1.3 This policy considers your fitness to practise in relation to your behaviour and your health, as poor health can affect your fitness to practise either directly or by being a cause of misconduct.
- 1.4 The Student Health Policy (published here: <https://www.uco.ac.uk/about-uco/who-we-are/policies-procedures-and-privacy>) details how the UCO addresses students' health and disability issues.
- 1.5 All pre-registration students are expected to comply at all times with this policy.
- 1.6 It is also important to be aware that these guidelines have been created with UCO graduates in osteopathy in mind as set out in approved course documentation, and reflects the characteristics set down in the Benchmarking Statement for Osteopathy, developed by the QAA for all osteopathic institutions in the UK (QAA, 2015). It is also informed by recent guidelines from the General Medical Council (GMC) who published similar policy statements for medical students (GMC 2016) and also the Guidance for Osteopathic Pre-Registration Education.
- 1.7 This policy is aimed at UCO students and anyone involved in osteopathic education at the UCO, and outlines the professional behaviour expected of students, as well as processes of fitness to practise assessments, investigations and decisions.

SECTION 2: THE MEANING OF STUDENT FITNESS TO PRACTISE

2.1 INTRODUCTION

2.1.1 Osteopaths who are registered to practice in the UK must do so in accordance with the [Osteopathic Practice Standards](#)¹, published by the General Osteopathic Council (GOsC, 2012):

2.1.2 *“The Osteopathic Practice Standards comprise both the Standards of Proficiency and the Code of Practice for osteopaths. This document presents all the standards of conduct and competence required of osteopaths to promote patients’ health and wellbeing and to protect them from harm.*

The Osteopathic Practice Standards play a central role in the requirements for osteopathic training and the achievement and retention of registration with the General Osteopathic Council. The document outlines the safe, competent and ethical practice of osteopathy.” (GOsC 2012, p. 3)

2.1.3 The Duty of candour² sets out the public commitment by the GOsC for open and honest communication with patients at all times by osteopaths and is incorporated into the Osteopathic Practice Standards. For students this will involve being open and honest in all their activities at the UCO, including work with educators and other staff at the UCO as well as honesty with patients, which may involve situations where the patients are dissatisfied.

2.1.4 ‘Fitness to practise’ relates to an osteopath’s ability to practice in accordance with the osteopathic practice standards, demonstrating appropriate knowledge, skills, attitudes and behaviour. As such, matters which affect patient safety, or which affect the trust that the public places in the profession may cause an individual’s fitness to practise to be questioned.

2.1.5 Whilst osteopathic students cannot always be held to the same standards as registered osteopaths, the underlying principles are similar as set out in the *“Student Fitness to Practice Guidance for Osteopathic Educational Institutions*³. As osteopathic students, you will be working towards being able to meet the practice standards. It is important that if you have serious fitness to practise problems you should not be allowed to be in a position whereby patients, your colleagues, the public, or the reputation of the profession are put at risk.

2.1.6 It is assumed throughout these guidelines that the UCO admissions process and the design of the syllabus have taken full account of the requirements of the GOsC in relation to admission to the profession as outlined in the Osteopathic Practice

¹ Available at: <http://www.osteopathy.org.uk/news-and-resources/document-library/osteopathic-practice-standards/osteopathic-practice-standards/>

² Available at <https://www.osteopathy.org.uk/standards/guidance-for-osteopaths/duty-of-candour/>

³ Available at: <https://www.osteopathy.org.uk/news-and-resources/document-library/training/sfpguidanceforoei/>

Standards and the Quality Assurance Agency Benchmark Statement for Osteopathy⁴.

- 2.1.7 It is the responsibility of the University UCO of Osteopathy to provide you with a reference to support your application to register with the General Osteopathic Council when you graduate. Any action taken under these regulations may have implications for this reference. Without this reference you may be unsuccessful in your application for registration.

2.2 THE THRESHOLD OF ACCEPTABLE BEHAVIOUR

- 2.2.1 Osteopaths are primary contact healthcare professionals and the standards governing their practise are aimed at equipping osteopaths to operate effectively as part of the wider healthcare community. In that respect, the Osteopathic Practice Standards cover the full range of the osteopath's responsibilities, from their legal obligations to patients to their duty to maintain competence through continuing professional development.

- 2.2.2 As a student at an osteopathic institution you are also expected to behave professionally at all times in line with the Student Fitness to Practise Guidance which is underpinned by the Osteopathic Practice Standards.

- 2.2.3 Your behaviour will be measured against the principles set out in this policy and your course documentation. If your behaviour falls below these expected levels, the UCO will consider if this amounts to a student fitness to practise concern, and therefore warrants consideration through its formal procedures.

- 2.2.4 Your fitness to practise as a student may be called into question when your behaviour raises a serious or persistent cause for concern about your ability to continue on the course, or to practise as an osteopath after graduation. This includes, but is not limited to, the possibility that you could put patients or the public at risk.

- 2.2.5 In these circumstances, you will be considered by the formal student fitness to practise procedures contained within this policy. These procedures consider your behavior's impact on patient and public safety, and public confidence in the osteopathic profession.

2.3 CATEGORIES OF CONCERN

- 2.3.1 The GOsC publishes Fitness to Practice reports⁵ annually. These reports include details of allegations established against osteopaths and the steps taken by the GOsC's Professional Conduct Committee in respect of those osteopaths. The UCO deems the high standards of conduct and proficiency required to maintain registration as an osteopath and the common areas of complaint to be very important in relation to our expectations of students' behaviour.

⁴ Available at: <http://www.qaa.ac.uk/en/Publications/Documents/SBS-Osteopathy-15.pdf>

⁵ Available at: <http://www.osteopathy.org.uk/news-and-resources/publications/fitness-to-practise-annual-reports/>

2.3.2 Two significant areas that arise as areas for complaints are:

- a) **Inadequate communication with patients.** This appears as a regular feature in the complaints considered by the GOsC. The ability to communicate effectively becomes even more important when responding to patient concerns or complaints. A number of complaints to the GOsC have arisen as a result of the osteopath not responding effectively, or at all, to the patient's concerns.
- b) **Professional incompetence.** The number of allegations of professional incompetence has increased in recent years. Many of these were brought to the GOsC's attention because the osteopath had not effectively responded to the patient's concerns when initially raised with them. In some cases, the patient experienced a reaction to treatment but there was no evidence to suggest that the osteopath had been incompetent. Effective communication during and after treatment would probably have resolved the issues and avoided the need for a formal investigation. The allegations of professional incompetence that were referred to the Professional Conduct Committee (PCC) were commonly related to the fact that the osteopath had failed to adequately assess the patient prior to commencing treatment. An absence of, or limited, neurological testing when the patient's symptoms had required this was a common feature in these cases.

2.3.3 Other areas where the GOsC might also take action in relation to fitness to practise in the event of a complaint being made, are where the osteopath has:

- a) treated patients without obtaining consent or other valid authority;
- b) made serious or repeated mistakes in diagnosing or treating a patient's condition;
- c) not examined a patient properly or not responded to reasonable requests for treatment;
- d) misused information relating to patients;
- e) taken an inadequate case history or kept inadequate notes;
- f) behaved dishonestly in financial matters, in dealing with patients, or in research;
- g) not had appropriate regard for the maintenance of boundaries;
- h) misused alcohol or drugs.

2.3.4 Several of these examples could clearly relate to the fitness to practise of osteopathic students as well as osteopaths.

2.3.5 [Table 1](#) below shows the types of concerns identified in student fitness to practise procedures at the UCO. Within each category, there is a list of examples of allegations that the UCO may consider to be so serious or persistent that they warrant the commencement of formal fitness to practise (FTP) procedures.

2.3.6 Decisions about the behaviour of students will be considered on a case-by-case basis and will be based on whether your behaviour calls into question either your

ability to continue on the course or your fitness to practise as an osteopath after graduation.

2.3.7 All students are required to follow the UCO's policies and procedures. Failing to do so may result in a FTP investigation being instigated.

TABLE 1: AREAS & EXAMPLES OF MISCONDUCT

Code	Area of Misconduct	Examples (not exhaustive)
A	Unprofessional behaviour or attitudes towards patients and colleagues	Breach of confidentiality; misleading patients about their care or treatment; sexual harassment; inappropriate examinations or failure to keep appropriate boundaries in behaviour; persistent rudeness to patients, colleagues or others; unlawful discrimination; repeatedly failing to follow written policy relating to patient care and management (e.g. letter writing), failing to follow written policy on the practice of technique; inappropriate use of social media or electronic media.
B	Unprofessional behaviour or attitudes towards academic study, staff and colleagues	Uncommitted to work; neglect of administrative tasks; poor record-keeping; poor time-management; persistent non-attendance at UCO clinic or classes; failing to sign case histories; misuse of ICT; gambling on UCO premises; practising, or purporting to practise, as an osteopath, other than under the auspices of the UCO; inappropriate communication with others at the UCO; disruptive behaviour; persistent rudeness to staff and colleagues; practising technique inappropriately.
C	Cheating or plagiarising	Cheating in examinations; passing off others' work as one's own.
D	Drug or alcohol misuse	Drunk-driving; alcohol consumption that affects clinical work or environment; dealing, possessing or misusing drugs even if there are no legal proceedings.
E	Aggressive, violent or threatening behaviour	Assault; physical violence; bullying (including cyberbullying); abuse, damage to or defacement of UCO property.
F	Dishonesty or fraud, including dishonesty outside the professional role	Falsifying research or any other type of academic work; financial fraud; fraudulent CVs or other documents; clinical dishonesty.
G	Criminal conviction or caution	Child pornography; theft; financial fraud; possession of illegal substances; child abuse or any other abuse; physical violence.

- 2.3.8 The examples in Table 1 are examples only and students are reminded to familiarise themselves with ALL policies and procedures published on the UCO's website here: <https://www.uco.ac.uk/about-uco/who-we-are/policies-procedures-and-privacy>.

SECTION 3: STUDENT FITNESS TO PRACTISE AND PROFESSIONAL BEHAVIOUR AT THE UCO

3.1 INTRODUCTION

- 3.1.1 The purpose of this section of the policy is to advise you on the professional behaviour that is expected of UCO students. It does not provide an exhaustive list of requirements but should encourage you to strive for high standards in your professional and personal lives.
- 3.1.2 Relative to your stage of development, restrictions will be placed on the clinical work you can do. As an osteopathic student, you must be aware that your activities will affect patients. Patients may see you as knowledgeable, and consider you to have the same responsibilities and duties as a qualified osteopath. You therefore have an obligation to maintain the trust that the public have in both the profession and the UCO.
- 3.1.3 Your osteopathic education gives you the opportunity to learn professional behaviour in a supervised environment which is safe for patients. It is also an opportunity for the UCO to identify types of behaviour that are not safe and to take appropriate action to support students in improving their behaviour; or if this is not possible or is unsuccessful, to ensure that this information is forwarded to the GOSc when considering their eligibility for registration.
- 3.1.4 You must be aware that your behaviour outside the clinical environment, including in your personal lives, may have an impact on your fitness to practise both at the UCO and when you are registered. Your behaviour at all times must justify the trust the public places in the osteopathic profession.

3.2 STUDENT SUPPORT MECHANISMS

- 3.2.1 There are mechanisms in place to support you during the course, whether you are encountering stress or emotional or academic difficulties. These will support your development of professional behaviour and fitness to practise.
- 3.2.2 You are allocated academic tutors to provide academic support throughout the course.
- 3.2.3 We encourage students to learn about the principles of stress management and the importance of maintaining both a healthy body and mind in order to cope with stressful situations.
- 3.2.4 You may seek learning and welfare support from our student support team. This includes easy access to an appropriate and confidential counselling service, which

can provide objective support and advice, without fear of any impairment to your future career.

3.2.5 The UCO advocates the development of the student mentoring scheme which allows new entrants to build supportive relationships with students at more advanced stages of the course.

3.3 PROFESSIONAL BEHAVIOUR AT THE UCO

3.3.1 The Osteopathic Practice Standards⁶ set out the standards of conduct and competence required of osteopaths registered in the UK. They are arranged in four main themes:

- A: Communication and patient partnership
- B: Knowledge, skills and performance
- C: Safety and quality in practice
- D: Professionalism

3.3.2 In the following section, we consider the behaviour expected of UCO students in the context of each of these themes.

A) COMMUNICATION AND PATIENT PARTNERSHIP

3.3.3 The therapeutic relationship between osteopaths and patients is built on trust and confidence, and osteopaths are required to have well developed interpersonal communication skills, and be able to adapt these to suit the specific needs of a patient. They must listen effectively, respect patients' concerns and preferences, and gain valid consent before examination and treatment this is underpinned by the Osteopathic Practice Standards section on Communication and patient partnership⁷. As a UCO student you will be increasingly involved with the management of patients as you progress through your course, and you will be supported in developing the effective communication skills that will underpin your practice. You should be aware that patients are likely to consider you to be in a position of responsibility, and so may attach added importance to your opinions or comments.

3.3.4 The UCO requires you to build relationships with patients based on honesty, openness, trust and good communication, focusing on behaviour that respects patients and their carers (including children, young people and other vulnerable groups), as well as protecting their rights.

3.3.5 As a UCO student, you should:

- a) be polite and considerate with patients and others.

⁶ Available at: <https://www.osteopathy.org.uk/standards/osteopathic-practice/>

⁷ Available at <https://www.osteopathy.org.uk/news-and-resources/document-library/osteopathic-practice-standards/osteopathic-practice-standards/>

- b) respect the decisions and rights of patients and ensure that you seek consent for all that you do (this will include patient involvement in teaching or research, as well as clinical activities).
 - c) be aware that treatment should be based on the patient's priorities and the effectiveness of treatment options, and that decisions, made in conjunction with the clinic tutor, should be arrived at through evaluation and partnership with the patient. This means giving patients the information that they want and need in a way that they can understand, so that they can make decisions about their own care.
 - d) be open and honest when dealing with patients, their carers, relatives, partners or anyone else close to them – this includes being honest if you don't know the answer to their questions, demonstrating your adherence to the duty of candour.
 - e) make sure you are clearly identified as a student, and that patients have consented to a student being involved in their care;
- 3.3.6 As an osteopathic student, you will be treating patients using the manual techniques taught on the course. Touch is a form of non-verbal communication between yourself and your patient. This aids you in developing the patient-practitioner relationship and the trust that the patient will put in you and your skills to get them better. You will have physical contact with your patients during treatment and this level of contact must be appropriate to the technique and treatment plan, devised in consultation with your clinic tutor. During these patient interactions, you will be therapeutically touching your patients and you must remain professional at all times.

B) KNOWLEDGE, SKILLS AND PERFORMANCE

- 3.3.7 Osteopaths are required to possess the relevant knowledge and skills to function as a primary healthcare professional. This includes understanding osteopathic concepts, and being able to apply them critically to patient care, recognising and working within the limits of their competence, and keeping their professional knowledge and skills up to date. As an osteopathic student, you will be learning the skills and knowledge required to become an osteopath, and will build on these as the course progresses and your experience broadens. Crucially, these will include the ability to reflect on your progress, identify your own limitations and learning needs, and devise a plan of action to address these. Your responsibility to maintain your knowledge and skills will be fundamental to all aspects of your osteopathic education, and your future career.
- 3.3.8 As a UCO student, you should:
- a) recognise the level of your competence, not exceed your limitations and ask for help when necessary
 - b) be aware that you must acquire the knowledge, skills and professional attitudes required of osteopaths in order to register with the GOsC.
 - c) be responsible for developing your own work and learning;
 - d) engage fully with your course, attending lectures, seminars, and tutorials and clinic sessions, and completing course work on time;

- e) reflect upon and critically appraise your academic and clinical performance, and plan and implement ways to enhance these;
- f) practise your technical skills only in inappropriate circumstances and in accordance with UCO policies. These should not be undertaken, for example, in the student bar or other social situations, nor should you work beyond the level of curriculum that has been delivered at your point of the course.
- g) demonstrate basic teaching and mentoring skills as required (e.g. communication with faculty, peers and patients; presentations; instructing patients);
- h) be willing to contribute to the education of other students through, for example, peer assessment and feedback;
- i) provide constructive feedback on the quality of your teaching and learning experience.

C) SAFETY AND QUALITY IN PRACTICE

3.3.9 Osteopaths are required to deliver high quality, safe and ethical care. They must be able to conduct an evaluation of a patient sufficient to reach a working diagnosis, and deliver an appropriate osteopathic treatment plan, or manage an alternative course of action. They are required to treat their patients as individuals, respecting their dignity, and putting good care at the heart of their practice. They must be polite and considerate, maintain full and accurate records and act quickly to help patients and keep them from harm. As a UCO student, you will learn evaluation and examination skills, and underlying knowledge that will enable you to formulate appropriate diagnoses and implement safe and effective treatment plans.

3.3.10 As a UCO student, you should

- a) respect patients and treat them with dignity
- b) not mislead anyone by misrepresenting your position or abilities
- c) provide appropriate care and treatment to patients, ensuring that you are supervised appropriately for any clinical task you perform, in carrying out the treatment plan agreed with your tutor
- d) maintain clinical records that are clear, legible, and an accurate and contemporaneous account of each patient encounter within the clinic. This will include recording of any additional communication with patients that take place (for example telephone conversations) relating to their care.
- e) refer to and follow all available policies and procedures that relate to the treatment and management of patients;
- f) be aware of ethical issues in your professional behaviour towards patients;
- g) Where possible inform the clinic of any unforeseen changes to your clinic diary to limit the disruption to patients and staff.

3.3.11 It is also important that osteopaths and students protect patients from harm resulting from another colleague's behaviour, performance or health. They should take steps to raise any concerns with the appropriate person. Please note the Public Interest Disclosure (Whistleblowing) and related policies (published here: <https://www.uco.ac.uk/about-uco/who-we-are/policies-procedures-and-privacy>), which has guidance on how to deal with issues such as these.

3.3.12 As osteopathic students, when you are practicing your technical and clinical skills, either on the UCO premises or outside, you must remain professional at all times, and respect the dignity of the person you are working with. You should maintain professional handling of your model and not take advantage of their vulnerability in this situation.

D) PROFESSIONALISM

3.3.13 Osteopaths are required to deliver safe and ethical healthcare by interacting with professional colleagues in a respectful and timely manner. They must act with integrity in their professional practice, and not abuse their professional standing. They must respect their patients' confidentiality and uphold the reputation of the profession through their conduct. Every student must be open and honest with patients when something goes wrong with their treatment or care which causes, or has the potential to cause harm or distress in line with the 'duty of candour'.

3.3.14 As a UCO student, you should:

- a) not unfairly discriminate against patients by allowing your personal views to adversely affect your professional relationship or the treatment you provide or arrange (this includes your views about a patient's age, culture, disability, ethnic or national origin, gender, lifestyle, marital or parental status, race, religion or beliefs, sex, sexual orientation, and social or economic status)
- b) respect the knowledge and skills of those involved in your education, and other healthcare professionals contributing to the care of your patients. You need to be able to work effectively with colleagues inside and outside of healthcare in order to deliver a high standard of care and to ensure patient safety. This will include effective communication with patients and colleagues. It is essential that you remain professional at all times when discussing your colleagues or members of other health care disciplines, and you should refrain from publicly criticising them.
- c) dress in an appropriate and professional way and be aware that patients will respond to your appearance, presentation and hygiene.
- d) be honest, genuine and original in your academic work, including when conducting research, and take effective action if you have concerns about the honesty of others;
- e) bring attention to any concerns about, or errors in, your clinical work;
- f) be honest and trustworthy when writing reports and logbooks, and when completing and signing forms;

- g) be honest and accurate in the completion of historical information, letters, reports or other documents relating to the care of your patients or communication with other professionals.
 - h) be honest in CVs and all applications and not misrepresent your qualifications, position or abilities;
 - i) be honest with patients if something has gone wrong with their treatment, and discuss openly the ways that this might be addressed.
 - j) not plagiarise others' work or use your own work repeatedly in a way that could mislead;
 - k) be honest and trustworthy in any financial dealings, especially if you are managing finances, and make sure that any funds are used for the purpose they were intended for e.g. Students' Union, fundraising;
 - l) bring to the attention of the UCO any changes in circumstances that may affect your Disclosure & Barring Service enhanced disclosure submission;
 - m) co-operate with any formal inquiry by the UCO or other organisation into your health, behaviour or performance, or that of anybody else;
 - n) comply with the laws of the UK and, where relevant, any laws that apply specifically in England, Wales, Scotland or Northern Ireland. You have a responsibility to tell the UCO if you have been charged with or found guilty of a criminal offence while you are a UCO student, or accepted a caution for a criminal offence. You should also disclose to the UCO if you are the subject of any legal proceedings which might call into question your fitness to practise.
 - o) comply with the regulations of the UCO.
 - p) maintain a professional boundary between yourself and your patients or anyone close to the patient. You must not use your professional position to cause distress or to exploit patients.
 - q) be aware at all times of the importance of maintaining the confidentiality of your patients and their clinical records. A patient's case must not be discussed, in a way that would identify them, with anyone not directly involved in their care or in a public place. Academic work that contains specific information about a patient must not identify the patient if it is to be seen outside the patient's care team (including peers and tutors).
- 3.3.15 Some students will be qualified in another profession or trade. Where this is the case, you must ensure that you are able to distinguish between this, and your role as a student osteopath (not least with respect to your scope of practice), and your position outside the UCO. You should avoid entering into any professional relationships with staff, other students, patients or members of the public working for or with the UCO where there is potential for the development of a conflict of interests, or where these relationships may bring the UCO or osteopathy into disrepute, nor should you conduct your business within the UCO. You are also prohibited from exploiting your

position as a student at the UCO to solicit for business, or to conduct your business in a manner that implies that you are providing that service on behalf of or with the approval of the UCO.

3.3.16 Where students have been, or are subject to fitness to practise or disciplinary proceedings with another regulatory body, then this must be disclosed to the UCO as soon as this is known.

3.4 ISSUES OF SAFETY RELATING TO ASSESSMENT

3.4.1 At the UCO, assessments are graded in broad bands rather than numerical marks. There are four pass grades (A, B, C & D) and three fail grades (E, F & G). A G grade can be awarded in the most serious of circumstances and should be connected with fitness to practise issues.

3.4.2 Across the institution a G grade can be awarded when either of the following conditions apply:

- a) In a practical assessment (including clinical assessment) the student makes a judgement or performs an action that is deemed to have a high risk of causing serious harm, unnecessarily high levels of discomfort to the patient, or fails to identify a clear need to act (including appropriate referral) to benefit the patient.
- b) In a written or oral assessment, the student makes and defends a statement that, if applied clinically, is likely to cause serious harm either by omission or commission.

3.4.3 If you are awarded a G grade in an assessment, the first stage of the Student Fitness to Practise Procedure will be initiated to investigate the reasons for awarding the G grade and to ensure you are fully aware of the issues raised. This is a supportive process to ensure that you are fully aware why what you are doing is a safety issue. The award of a G for more than one assessment or the same assessment more than once may be viewed more seriously.

3.4.4 Due to the professional and practical nature of the practical and clinical units, the G grade description has been elaborated to ensure clarity. The specific G grade descriptions for these units are contained in your Course Handbook.

3.4.5 Where Mini Clinical Exam (MCE) grades are cumulative no re-sit exam will normally be held for students who fail any of the five MCE, regardless of their grade. If the unit is failed overall the student will normally have the opportunity to re-sit assessments in the summer vacation period. (Please see student handbook for further information) f) Health

3.5 ISSUES RELATING TO HEALTH

3.5.1 It is important that you are aware that your own poor health may put patients and colleagues at risk.

3.5.2 If osteopaths know or suspect their physical or mental health is impaired in such a way that it might affect the care given to patients, the Osteopathic Practice Standards require them to seek and follow advice from a suitably qualified professional; they

may need to stop practising until they are deemed able to return to practice by their medical advisor.

3.5.3 For the protection and well-being of both patients and students, all students are strongly advised to be immunised against Hepatitis B, and to ensure that their immunisations against Polio, TB, Tetanus, MMR, Diphtheria and Varicella are all up to date.

3.5.4 As a UCO student, you should:

- a) be aware that your own health problems may put patients and colleagues at risk;
- b) seek medical or occupational health advice if there is a concern about your health;
- c) accept that you may not be able to assess your own health, and be willing to be referred for treatment and to engage in any recommended treatment programmes;
- d) not rely on your own or another student's assessment of the risk posed to patients by your health, and seek advice, when necessary, from a qualified clinician or other qualified healthcare professional;
- e) be aware that you must let it be known if your health poses a risk to patients or the public.

3.5.5 The Health Policy & Health Related Fitness to Practise Procedures for Pre-Registration Students (published here: <https://www.uco.ac.uk/about-uco/who-we-are/policies-procedures-and-privacy>) deals explicitly with student health issues which may lead to fitness to practise issues.

3.6 ATTENDANCE

3.6.1 Persistent and ongoing attendance issues will normally be dealt with under Disciplinary Procedures, but may become a Fitness to Practise concern if attendance issues continue.

SECTION 4: FITNESS TO PRACTISE PROCEDURES AT THE UCO INTRODUCTION

4.1 INTRODUCTION

4.1.1 The purpose of this part of the policy is to define the scope of the formal fitness to practise procedures of the UCO. These relate to students on all courses leading to eligibility to register as an osteopath and who are in contact with patients.

4.1.2 The UCO deals with only a small number of cases through its formal procedures so it is not practical to produce an exhaustive list of examples and outcomes. The behaviour of all students must be considered on a case-by-case basis by student fitness to practice investigators.

4.1.3 The main principles are as follows:

- a) The Student Fitness to Practise Panel is administered within the Registry Department.

- b) Any concerns about a student's fitness to practise are to be disclosed either to the Course Leader or the Registrar.
 - c) Following receipt of a report of the investigation into the case, the Course Leader determines whether the case will be referred to the Student Fitness to Practise Panel.
 - d) Appeals are heard by the Appeals Committee, which is chaired by the Vice-Chancellor.
- 4.1.4 The UCO will provide support and confidential pastoral care to help you if you need to improve your behaviour. When student fitness to practise concerns are identified, the UCO may offer support before, alongside, or instead of using student fitness to practise procedures. However, this decision must be based on an assessment of the risk to patients and the public. The UCO where applicable should give you clear information about the range and type of support services available. Staff should be aware of the details of what support is available and direct you to an appropriate service if necessary. Anyone who provides pastoral care will not also be involved in investigating or making decisions that could affect your future at the UCO.

4.2 AWARDING OF G GRADE

- 4.2.1 This section is to outline the supportive procedures that are followed when a student is awarded a G grade in an assessment. The definition of and procedure for the awarding of a G grade are outlined in Section 3.
- 4.2.2 When your assessment results are published and you have been awarded a G grade, the letter will request you to make an appointment to see the Course Leader.
- 4.2.3 The meeting will ensure that you are aware of the reasons for your achieving a G grade.
- 4.2.4 The meeting will outline supportive measures available to you, in an attempt to ensure that you do not repeat the same mistakes and are not awarded a second G grade.
- 4.2.5 Notes from this meeting will be kept on your record for the duration of your education at the UCO. If a G grade is awarded again for the same assessment, the course leader may initiate the disciplinary stages of the Student Fitness to Practise and Professional Behaviour Policy (see Section 4.3).

4.3 STUDENT FITNESS TO PRACTISE AND PROFESSIONAL BEHAVIOUR POLICY - PROCEDURE STAGES 1-4

STAGE 1: NOTIFICATION OF A FITNESS TO PRACTISE CONCERN

- 4.3.1 Any member of staff or student who has reason to believe that there is a question as to a student's fitness to practise, as outlined in this policy, (hereinafter called the Complainant) should notify the relevant Course Leader by completing the "**Breach of**

Student Fitness To Practise and Professional Behaviour Policy Notification Form” (Appendix 1).

- 4.3.2 If a student is awarded a G grade in an assessment or practical exam for a second time, then the Course Leader will initiate an investigation and then appoint an Investigating Officer.
- 4.3.3 The Course Leader will acknowledge receipt of the form usually within five working days of receipt, and will appoint an Investigating Officer (normally a Unit Leader not involved with the case and who is an osteopath) to investigate the alleged breach of the Student Fitness to Practise Policy (hereinafter called the alleged offence).
- 4.3.4 The Course Leader will usually, within five working days of receipt of the allegation, notify the student who is alleged to have committed the offence that an investigation is commencing.
- 4.3.5 Implementation of the Student Fitness to Practise Procedure is a serious matter, and any student brought within it is advised to seek assistance from the Students’ Union.
- 4.3.6 The Course Leader will initially appraise the gravity of the alleged offence against the Fitness to Practise Policy. If the Course Leader deems the alleged breach of policy to be highly serious s/he will recommend to the Vice-Chancellor that the student is suspended whilst the investigation is undertaken. If the Vice-Chancellor considers that the allegations justify the suspension of the student from the UCO, he/she must notify the student of his/her decision as soon as is reasonably practicable. The student may make a representation either orally or in writing to the Vice-Chancellor against the suspension at this point. Suspensions will be regularly reviewed.
- 4.3.7 Where the conduct complained of seems likely to amount to criminal activity, the Vice-Chancellor may decide to ask the police to initiate their own enquiries, in which case the Vice-Chancellor may suspend the UCO’s own procedures pending the outcome of the police enquiry. If reference to the Vice-Chancellor is invoked at this stage, or if the student who is under investigation already has a current formal written warning on file, the Course Leader should inform the Registrar, who will arrange for a meeting of the Student Fitness to Practise Panel to be convened to meet at the completion of the Investigating Officer’s report, irrespective of the findings.

STAGE 2: INVESTIGATION OF THE FITNESS TO PRACTISE CONCERN

- 4.3.8 It is important to distinguish between the role of the Investigating Officer appointed by the UCO and the role of the Fitness to Practise Panel. The investigator considers the initial evidence and recommends to the Course Leader if it is serious enough to be referred to the Student Fitness to Practise Panel. The Panel’s role is to deliberate formally and decide whether the student is fit to practise, and what sanctions, if any, should be imposed. The Investigating Officer may consider whether the behaviour is so serious or persistent as to call into question the student’s ability to continue on the course, or their fitness to practise as a student, and as an osteopath after graduation. The investigator should not, as far as possible, be the student’s personal tutor or anyone else who is involved in supporting the student or making decisions about their academic progress and should keep a full record of the investigation.

- 4.3.9 The appointed Investigating Officer will determine how to conduct the investigation. The investigation procedures will normally include a formal interview with the student who is alleged to have committed the offence. It may include interviews with witnesses to the alleged offence, an interview with the complainant and scrutiny of documentary evidence if appropriate. The Investigating Officer may also call for written statements.
- 4.3.10 If the investigation is regarding a student's lack of attendance, the Investigating Officer will be required to include the attendance statistics (from Student Attendance and Retention Group (SARG) minutes), any correspondence with the student (copies of emails/letters) and a statement from the relevant Unit Leader.
- 4.3.11 The student's academic profile should also be included in the report for the investigation.
- 4.3.12 The Investigating Officer must be appropriately trained and be able to act in a proportionate way by weighing the interests of patients, the public and colleagues against those of the student. It is important to consider whether the behaviour is better dealt with through student support and remedial tuition rather than through a formal panel hearing. However, if the Investigating Officer recommends that the behaviour is so serious or persistent as to call into question the student's ability to continue on the course, or their fitness to practise as a student, or as an osteopath after graduation, the case should be referred to the Fitness to Practise Panel despite any mitigating factors such as health problems.
- 4.3.13 The Investigating Officer will prepare a report of his/her findings and present the report to the Course Leader usually within ten working days of receiving the request to investigate. Any mitigating factors will be considered by the Course Leader when deciding on the appropriate outcome. The Course Leader will also ensure that any warning or sanction they decide upon is proportional to the behaviour and will deal effectively with the fitness to practise concern.

STAGE 3: INVESTIGATION REPORT OUTCOME MEETING

- 4.3.14 On receipt of the Investigating Officer's report, the Course Leader will call a meeting to discuss with the student the outcome of the investigation and provide the student with a copy of the report. The student will be permitted to be accompanied by a friend: for example, an officer of the UCO Students' Union, a fellow student, or a member of academic staff. Their role will be pastoral and not representative. The UCO must be notified of the name and affiliation of the person concerned in advance of the meeting. It is not normally necessary to be accompanied by a legally qualified person, but if the student does decide to seek approval to be accompanied by such a person, the UCO reserves the right to include a legally qualified colleague to participate in the meeting. The Course Leader will appoint a secretary for this meeting.
- 4.3.15 The purpose of the meeting will be to determine whether, having considered the Investigating Officer's report and discussed the Fitness to Practise concern with the

student, there are grounds for a hearing or referral to the Student Fitness to Practise Panel.

4.3.16 The possible outcomes to this meeting are as follows:

- a) The Course Leader finds that there is no case to answer and closes the proceedings;
- b) The Course Leader issues an oral warning concerning the student's future conduct and this will be noted on the student's record;
- c) The Course Leader issues a written warning concerning the student's future conduct and this will be noted on the student's record;
- d) The Course Leader decides that the case should be referred directly to a Student Fitness to Practise Panel;
- e) The Course Leader may recommend to the Vice-Chancellor that the student should be suspended from the UCO whilst a Student Fitness to Practise Panel is convened.

4.3.17 If the student fails to attend the meeting with the Course Leader and produces no evidence of a justifiable reason for their non-attendance then the Course Leader shall recommend that a Student Fitness to Practise Panel is convened.

4.3.18 If a Student Fitness to Practise Panel is convened the student will be provided with guidance notes on the format of the panel and the possible outcomes by the meeting Secretary.

STAGE 4: STUDENT FITNESS TO PRACTISE PANEL

4.3.19 All Fitness to Practise cases to be considered by the Student Fitness to Practise Panel will usually be processed within ten working days of the referral being made by the Course Leader.

4.3.20 The Student Fitness to Practise Panel will consist of panel members that are independent of the investigation.

4.3.21 Panel members should have appropriate experience and receive training for their role. There should be a clear description of the requirements of the role. Panellists must: know and understand the rules and regulations of fitness to practise and disciplinary matters at the UCO, be fair-minded and willing to hear the full facts of the case before reaching a decision and be prepared to seek appropriate expert advice, making sure fitness to practise proceedings are fair and proportionate.

4.3.22 A student who is referred to the Student Fitness to Practise Panel will receive a notice in writing giving a brief but clear specification of the charge and providing at least five working days' notice to appear before the Panel.

4.3.23 The student will be notified that he/she may call such witnesses in defence as he/she may think fit and must inform the Secretary of the Panel of the names of those witnesses in advance of the hearing.

- 4.3.24 The student will be notified that a fellow student or a Students' Union representative at the hearing may accompany him/her and that he/she should approach either the Secretary of the Panel or the Students' Union for advice as to the procedure, and guidance to help put together information for the hearing.
- 4.3.25 The student will be permitted to be accompanied by a friend: for example, an officer of the UCO Students' Union, a fellow student, or a member of academic staff. Their role will be pastoral and not representative. The UCO must be notified of the name and affiliation of the person concerned in advance of the meeting. It is not normally necessary to be accompanied by a legally qualified person, but if the student does decide to seek approval to be accompanied by such a person, the UCO reserves the right to include a legally qualified colleague to participate in the meeting.
- 4.3.26 The Panel will, as a minimum, receive a written statement of the allegation, the Investigating Officer's report, any supplementary report (which the Chair may commission from another member of staff acting in a capacity comparable to that of the Investigating Officer), and a written statement from the student alleged to have committed the offence.
- 4.3.27 The student may admit the alleged fitness to practise issue at any time prior to the day of the hearing by notifying the Secretary of the Panel. Any admission should be recorded in writing with an accompanying reflective account that clearly demonstrates reparation which should be signed by the student. The Panel will still convene to determine the outcome and the student may attend to address the Panel prior to the penalty being decided to offer a justification or mitigation for his/her actions. The Panel should take into account the student's prior admission when deciding the outcome.
- 4.3.28 Where the student has not admitted the issue of non-fitness to practise prior to the day of the hearing, the hearing will normally take the following form:
- 4.3.29 The Panel will receive written and/or oral evidence from the Investigating Officer and his/her witnesses as to the nature of the alleged fitness to practise issue in the presence of the student and his/her colleague.
- 4.3.30 The secretary of the panel will ask the student if they would like to question the Investigating Officer before the panel is held. The student will need to confirm this in writing. If there is no response, the Chair of the Panel may call the investigating officer and the panel will convene as scheduled.
- 4.3.31 The student will then be invited to give written and/or oral evidence, and may call his/her witnesses. This may involve evidence of mitigation for his/her actions.
- 4.3.32 The Panel may question all parties.
- 4.3.33 After all the evidence is heard, both parties will be asked to withdraw, and the Panel will arrive at a decision.
- 4.3.34 If the allegation is proven on the balance of probability, the Panel will determine the outcome taking into account the student's disciplinary record. Possible outcomes of

the Panel hearing are listed in Section 5:1 Outcomes of Student Fitness to Practise and Professional Behaviour Policy Hearings below.

- 4.3.35 The secretary to the Panel will write to the student with its decision, usually within five working days of the date of the hearing.
- 4.3.36 The secretary to the Panel will inform the Registrar of its decision and this record will be kept by the Registrar.
- 4.3.37 The Course Leader will support the student in arranging conditions or sanctions and will monitor the student's progress.
- 4.3.38 The student will be notified in writing of the names of the senior management / faculty members who will be privy to the outcome(s) of the investigation.
- 4.3.39 The secretary to the Panel will collect any reports required from the student with regard to any conditions/sanctions and the Panel will reconvene at a pre-set date to review the student's report. This meeting will be documented and a record of it will be kept on the student's file in the Registry.

SECTION 5: OUTCOMES OF STUDENT FITNESS TO PRACTISE PANEL HEARINGS

- 5.1 Possible outcomes of Fitness to Practise Hearings include:
 - a) The student receives no advice, warning or sanction.
 - b) The student receives an advisory note.
 - c) The student receives a warning as there is evidence of misconduct but the student's fitness to practise is not impaired to a point requiring any of the sanctions listed below.
 - d) The student receives a sanction. Beginning with the least severe, the sanctions are:
 - i. Undertakings.
 - ii. Conditions
 - iii. Suspension from the course.
 - iv. Expulsion from the course.
- 5.2 All warnings or sanctions will be kept on the student's file for 6 years in line with our retention schedule. If a warning or sanction is awarded, this may be noted in the reference letter provided by the UCO in support of the student's application to register with the GOsC but details of the investigation will not be disclosed unless requested by the GOsC.
- 5.3 Fitness to Practise Panels should refer to Section 7: Glossary of Terms for use by Panels when considering outcomes of hearings.
- 5.4 The panel will make the objectives of any conditions clear, so the student knows what is expected of them. Conditions should be:

- Specific.
- Proportionate.
- Workable.
- Time bound.
- Measurable.
- Monitored.

SECTION 6: APPEAL PROCEDURE

- 6.1 Within five working days of the decision's being notified, a student may appeal in writing to the Academic Registrar against the outcome of the Fitness to Practise Hearing outcome stating the full grounds of the appeal.
- 6.2 If a student is issued with a warning from the Panel an appeal will not normally be considered.
- 6.3 If in the view of the Registrar the grounds of appeal cast doubt on the validity of the panel's decision, they will convene an Appeal Hearing to re-examine the case in the light of any additional evidence provided by the student as follows:
- 6.4 Where the student was issued with a penalty other than permanent exclusion or suspension, the Vice-Chancellor (or their nominee) will hear the appeal. Unless it is deemed appropriate by the Vice-Chancellor, there will be no re-hearing of the matter.
- 6.5 Where the student was issued with a sanction consisting of either permanent exclusion or suspension, an Appeal Panel will hear the appeal.
- 6.6 The Appeal Panel will consist of:
 - a) Three Board Members of the UCO nominated by the Chair of the Board, one of whom will act as Chair and at least two of whom will be external to the UCO.
 - b) A Secretary appointed by the Registrar.
 - c) The Appeal Panel will normally sit within fifteen working days of the receipt of the appeal.
- 6.7 The student will be permitted to be accompanied by a friend: for example, an officer of the UCO Students' Union, a fellow student, or a member of academic staff. Their role will be pastoral and not representative. The UCO must be notified of the name and affiliation of the person concerned in advance of the meeting. It is not normally necessary to be accompanied by a legally qualified person, but if the student does decide to seek approval to be accompanied by such a person, the UCO reserves the right to include a legally qualified colleague to participate in the meeting.
- 6.8 The student will be provided with a copy of the minutes of the proceedings of the Student Fitness to Practise Panel hearing.
- 6.9 The Appeal Hearing will normally take the following form:
 - a) A nominated member of staff appointed to answer the appeal will address the Appeal Committee.
 - b) The student, who may be accompanied by a colleague or a Students Union representative, will then address the Appeal Committee.
 - c) If additional witnesses are permitted then these will be called and will be liable for cross-examination.

- 6.10 The parties will be required to withdraw while the Appeal Panel considers its decision.
- 6.11 The outcome of the appeal will be communicated to the student by letter normally within five working days of the hearing and a copy of this letter will be sent to the Registrar and held on the student's file within the Registry.
- 6.12 Where a student's appeal is successful, the case will be referred back to the Student Fitness to Practise Panel, who will reconsider the case in the light of the Appeal Panel's comments and representation from the student. The decision of this Panel shall be final and a Completion of Procedures Letter shall be produced.
- 6.13 Where a student's appeal is unsuccessful, whether or not the penalty involves suspension or dismissal, the UCO will issue a Completion of Procedures letter to the student, advising them of their right to refer the matter to the Office of the Independent Adjudicator.

SECTION 7: GLOSSARY OF TERMS FOR USE BY STUDENT FITNESS TO PRACTISE PANELS

7.1 WARNINGS

- 7.1.1 Warnings are formal statements that indicate that your behaviour is unacceptable. Warnings will be given when your behaviour raises concerns but it is not so serious that your fitness to practise is impaired. Support will be provided for you to address any underlying problems that may have contributed to your poor behaviour.
- 7.1.2 Any subsequent incidents may be considered in light of earlier warnings. Patterns of poor behaviour may give rise to more serious concerns about your fitness to practise.
- 7.1.3 A warning means your behaviour does not merit a sanction. But it will remain on your record until you complete the course. Unless further warnings are issued, you need not declare it to the GOsC when applying for provisional registration.
- 7.1.4 A warning may be deemed appropriate particularly when:
- The behaviour in question does not involve dishonesty, offences of a sexual nature or a lack of insight or responsibility, and
 - There have been no previous concerns about your fitness to practise.
- 7.1.5 Panels might consider issuing a warning if:
- There was no direct or indirect patient harm, and
 - The panel is satisfied that you will take the warning seriously, and
 - You have provided insight into why your behaviour was inappropriate, and
 - The behaviour was serious enough to warrant formal recognition.

7.2 SANCTIONS

- 7.2.1 The purpose of the four types of sanction is to ensure that students whose fitness to practise is impaired are dealt with effectively, including possibly being removed from the course. A sanction also gives you the opportunity to learn from your mistakes.
- 7.2.2 Panels will consider whether the sanction will protect patients and the public and will maintain professional standards. If the behaviour involves dishonesty, offences of a sexual nature, or a lack of insight, lower-level sanctions are unlikely to be appropriate.

7.3 UNDERTAKINGS

- 7.3.1 An undertaking is a promise given by you in writing to the panel that you will not behave in a certain way in the future. This sanction applies when there is a finding that your fitness to practise is impaired. You will be asked to consent to disclose this sanction to the appropriate people and it may be declared to the GOsC at the point of providing a reference for registration.
- 7.3.2 If you break the undertaking, you may be dealt with by other sanctions.
- 7.3.3 Undertakings will be proportionate, workable and measurable. Examples of sanctions may include increased supervision, regular monitoring of student progress, a reflective account of the concern and/or further training. This list is not exhaustive.
- 7.3.4 Panels may want to consider an undertaking if:
- It will be sufficient to protect patients and the public, and
 - It covers all the conditions the panel would otherwise have imposed, and
 - The behaviour did not involve dishonesty or a sexual offences, and
 - You have provided insight into the seriousness of the problem and are willing to respond positively to any interventions, and
 - You have apologised and expressed genuine regret.

7.4 CONDITIONS

- 7.4.1 Conditions are appropriate when there is significant concern about your behaviour. This sanction will be applied if the panel is satisfied that you might respond positively to remedial tuition and increased supervision. The panel will consider any evidence such as reports on your performance, health or behaviour.
- 7.4.2 If a panel has found your fitness to practise impaired because of poor physical or mental health, the conditions may include additional clinical supervision as well as academic supervision and an expectation of evidence of further reflective development. You will be asked to consent to disclose this sanction to the appropriate people and it must be declared to the GOsC at the point of applying for registration.

7.4.3 Conditions will be proportionate, workable and measurable. Examples of conditions may include but is not exhaustive increased supervision, regular monitoring of student progress, a reflective account of the concern and/or further training.

7.4.4 Panels may want to consider conditions if:

- a) Patients will not be put at risk as a result of your being allowed to continue on the course, and
- b) The behaviour did not involve dishonesty or a sexual offence, and
- c) You understand the seriousness of the problem and are willing to respond positively to any interventions, and
- d) You have apologised and expressed genuine regret, and
- e) There is a realistic chance that you will positively change your behaviour.

7.5 SUSPENSION

7.5.1 Suspension prevents you from continuing with your course for a specified period and graduating at the expected time. Suspension is appropriate for misconduct that is serious but not so serious as to justify expulsion from the UCO.

7.5.2 When you return from suspension, you are expected to comply with any further conditions. You will be asked to consent to disclose the suspension and conditions to the appropriate people and must declare the suspension and conditions to the GOsC at the point of applying for registration.

7.5.3 The panel might want to consider a suspension if:

- a) A less severe sanction is not appropriate, and
- b) The behaviour is unlikely to be repeated, and
- c) You have provided insight into the seriousness of the problem and are willing to respond positively to any interventions, and
- d) There is a realistic chance that during the period of suspension you will positively change your behaviour.

7.6 EXPULSION

7.6.1 The panel can expel you from the UCO if they consider that this is the only way to protect patients, carers, relatives, colleagues or the public. You will be offered support to enable you to transfer to another course if appropriate. However, the nature of your expulsion may mean that you should not be accepted on certain courses, or even on any other course.

7.6.2 Expulsion, the most severe sanction, should be applied if your behaviour is considered to be fundamentally incompatible with continuing your studies or eventually practising as an osteopath.

SECTION 8: REFERENCES AND APPENDICES

8.1 REFERENCES

The University College of Osteopathy, *Public Interest Disclosure (Whistleblowing) Policy*:

<https://www.uco.ac.uk/about-uco/who-we-are/policies-procedures-and-privacy>

The University College of Osteopathy, *Student Clinic Handbook*
http://intranet.uco.ac.uk/guidelines_and_handbooks/staff_and_students

General Osteopathic Council *Fitness to Practise Annual Reports*,
<http://www.osteopathy.org.uk/resources/publications/fitness-to-practise-annual-reports/>

General Osteopathic Council (2012) *Osteopathic Practice Standards*

<http://www.osteopathy.org.uk/standards/osteopathic-practice/>

Quality Assurance Agency (2015) *Subject Benchmark Statement: Osteopathy*

<http://www.qaa.ac.uk/en/Publications/Documents/SBS-Osteopathy-15.pdf>

APPENDIX 1: BREACH OF STUDENT FITNESS TO PRACTISE AND PROFESSIONAL BEHAVIOUR
POLICY NOTIFICATION FORM



**BREACH OF STUDENT FITNESS TO PRACTISE
AND PROFESSIONAL BEHAVIOUR POLICY NOTIFICATION FORM**

This form should be used by any member of staff or student who has reason to believe that a student has breached the UCO's Student Fitness to Practise and Professional Behaviour Policy.

Before completing this form, students should have read the UCO 's Student Fitness to Practise and Professional Behaviour Policy.

Information about the member of staff or student submitting the form:

Name in full:	
Correspondence address:	
Telephone number:	
Email address:	

Nature of the Breach of Student Fitness to Practise and Professional Behaviour Policy

Please set out as concisely as possible the nature of the breach. In particular, it is important to know the names of any other persons involved (staff, students, or others), when the event or incident occurred and the exact circumstances of the event or incident. If you wish to give further details on a separate sheet please do so.

Important Note

You should be aware that some breaches of the Student Fitness to Practise and Professional Behaviour Policy may give rise to disciplinary action against students. There may also be circumstances in which the police may be notified.

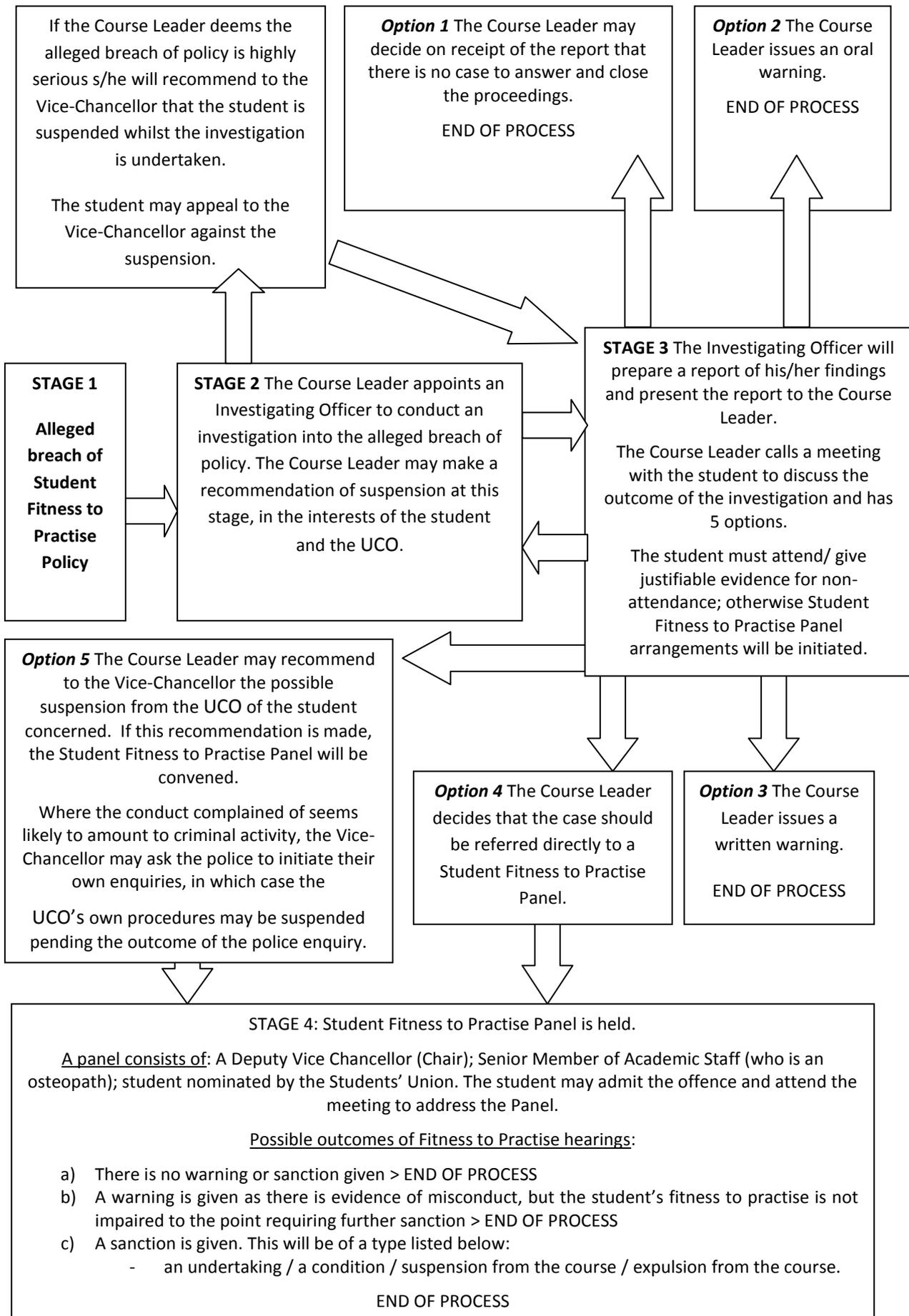
Declaration

I*/We* have read*/not read* the UCO's Student Fitness to Practise and Professional Behaviour Policy.

I*/We* declare that the information contained on this form is correct.

Signature:.....**Date:**.....

APPENDIX 2: ALLEGATION PROCESS



APPENDIX 3: APPEAL PROCESS

