RIPLEY ITT

Fitness to practise and cause for concern policy

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Introduction

Roles and Responsibilities

The Trust has overall responsibility for the effective operation of this policy. The Executive Steering Group is responsible for approving this policy and monitoring its effectiveness. The Executive Steering Group is responsible for ensuring that staff are treated fairly and consistently in the application of this policy and procedure. The Executive Steering Group has delegated day-to-day responsibility for operating the policy to the SCITT Director. The SCITT Director has specific responsibility to ensure the fair application of this policy and that procedures are followed

Purpose

The purpose of this policy is to provide clear procedures for dealing with concerns raised by Ripley ITT or its partner schools about a trainee's fitness to practise. Trainee is a term used to refer to provider-led trainee and teacher apprentice.

Nothing in this policy is intended to form the basis of a contract between the SCITT and Trainee. The SCITT may amend this policy at any time.

Scope

1. This policy can be used by anyone who is employed by Ripley ITT or its partner schools for the duration of the training and up to 12 months after completion of the training.
2. This policy does not cover:
    - complaints or appeals raised by trainees which are covered in the Ripley ITT SCITT Complaints and Appeals policies
    - admissions to the Ripley ITT SCITT course which are covered in the Ripley ITT SCITT Admissions policies
    - appeals relating to failure of placement or the award of QTS, which are covered in the Ripley ITT SCITT Appeals Policy
    - non-payment of fees which is covered in the Ripley ITT Contract

3. This policy has been written with reference to the Secretary of State's ITT Criteria and Supporting Guidance and the OIA Good Practice Framework.

General Principles

a. Ripley ITT aims to provide an inclusive training programme for the Trainees it serves.

b. Ripley ITT and its partner schools recognise that Trainees are still learning about the professional standards and conduct required in the teaching profession.

c. Ripley ITT will seek to discuss concerns informally with a Trainee unless the issue giving rise to the Fitness to Practise concern is sufficiently serious

d. Ripley ITT expects all parties to act reasonably and fairly towards each other, and to treat the processes themselves with respect.

e. Ripley ITT will work to ensure this policy is used fairly, proportionately and in a timely way.

f. Ripley ITT will ensure that decisions are taken by people without actual or perceived conflicts of interest and that all involved will ensure an appropriate level of confidentiality through the process, without causing disadvantage.

g. Where appropriate, trainees will be offered the opportunity to be accompanied by a friend, family member or representative from a Teaching Union or Students' Union. Such occasions are clearly indicated in the policy

h. Ripley ITT will put all the outcomes of any investigation in writing for the Trainee. A Completion of Procedures (COP) letter will be used at 'end points' in the process. Occasions when this will happen are clearly indicated in the policy.

Definitions and Examples

For the purposes of this policy, **fitness to practise** is defined as a state in which:

'trainees have the health and physical capacity to train to teach and in so doing will not put themselves, children or young people at risk of harm.'

Raising a **cause for concern** regarding a trainee's progress initiates a process which is intended to be developmental and supportive, designed to help a trainee get back on track and successfully complete their training.

In some cases, a **cause for concern** may be deemed sufficiently serious to warrant immediate action by the Ripley ITT Director. This may occur when:

the trainee's attitude or professional or personal conduct falls significantly short of the requirements of the Ripley ITT Code of Conduct or the Teachers' Standards Part 2;
the trainee's professional progress is having a significant impact on staff and/or pupils in the placement school.

In such instances, the Ripley ITT Director has the right to suspend a trainee from training with immediate effect and instigate a Fitness to Practise process (see Section 4).

This policy covers three areas in which a **cause for concern** may be raised:

Section 1 – Cause for concern relating to personal or professional misconduct

Examples of concerns which fall under this category are:

- Persistent lateness or absence;
- Inappropriate use of social media sites;
- Breach of confidentiality;
- Dishonesty or fraud (failure to declare at admissions stage, falsifying qualifications or records, bursaries);
- Drug, alcohol or substance misuse;
- Persistent inappropriate behaviour or attitude;
- Aggressive, violent or threatening behaviour;
- Suspension, exclusion or self-withdrawal from placement;
- Criminal conviction or caution;
- Failure to disclose any new criminal convictions or cautions acquired during the training programme;
- Damage to or theft from property of Ripley ITT or its partner schools;
- Financial misconduct;

- Safeguarding concerns;
- Any other behaviour which falls below the benchmarks set out in the Teachers' Standards.

Section 2 – Cause for concern relating to professional progress

Examples of concerns which fall under this category are:

- Failure to comply with programme requirements (completion of records, following Ripley ITT procedures, preparedness to teach);
- Failure to achieve the required standards of literacy and numeracy;
- Failure to achieve or maintain the required quality of teaching in line with the course structure.

Section 3 – Cause for concern relating to health issues

Examples of concerns which fall under this category are:

- Concerns relating to disability or health and wellbeing;
- Failure to disclose any changes to disability or health and wellbeing during the training programme.

Please note that the above is not an exhaustive list and Ripley ITT fully reserves its right to identify other conduct which may be subject to the terms of the policy.

Specifically, a cause for concern:

- can be raised at any point in the programme through the processes set out in the present policy;
- will relate to specific aspects of a trainee's conduct, practise or ability to practise safely;
- will result in the identification of any necessary additional training, supportive actions and agreed review points;
- will result in the identification of any necessary additional agreed school- and centre-based monitoring.

Disability, Health and Wellbeing

If it is established at any point in the procedures in this policy that the cause for concern relates to the Trainee's disability, health or wellbeing, the procedure outlined in Section 3 – **Cause for concern relating to health issues** – will be followed. This may involve referral to Ripley ITT's Occupation Health services provider, and the subsequent report will be used by the Ripley ITT Director along with other evidence in informing further decisions.

Targets to support a Professional Support Plan or Cause for Concern Action Plan

Targets set to support improvement in the practice or conduct of a trainee engaged in a cause for concern process must:

- be explicitly linked to the area(s) of concern in the trainee's teaching, mastery of the Ripley ITT curriculum, impact on outcomes for pupils or their ability to uphold the expectations of Part Two of the Teachers' Standards;
- be time-bound and realistically achievable within the timescales set;

- be actionable and measurable in order that progress towards them can be judged accurately;
- include agreed actions for both the trainee and all those working with them to support in the training programme;
- be set and reviewed in the light of the full range of evidence.

Section 1: Cause for concern relating to professional and personal conduct

Requirements relating to professional and personal conduct

Trainees must, at all times within their training, demonstrate consistently high standards of personal and professional conduct, as set out in Part Two of the Teachers' Standards and the Ripley ITT Trainee Code of Conduct. All members of Ripley ITT staff and staff in partnership schools have a duty to inform Ripley ITT course leaders if they believe a trainee's attitude or personal or professional conduct does not meet these high standards.

Procedures for managing concerns regarding professional and personal conduct

If the concern is deemed serious enough, because the trainee's attitude or professional or personal conduct falls significantly short of any of the requirement set out in the Ripley ITT Code of Conduct or the Teachers' Standards Part Two, the Ripley ITT Director has the right to suspend a trainee from training (including attending placement) with immediate effect and instigate stage 5 of this procedure or, in the case of misconduct, to deal with the incident via the Bay Learning Trust Disciplinary Policy.

Stage 1 Informal school-based support	If course leaders or staff in partnership schools have reason to believe that a trainee's attitude, behaviour or conduct is not meeting the requirements set out in the Ripley ITT Code of Conduct or the Teachers' Standards, they will be informed of these concerns and the Subject Mentor and Professional Mentor (secondary) or Headteacher (primary) will discuss targets for improvement which will be noted on Mosaic in the usual way with a timescale for improvement of 2 weeks. The Subject Mentor should inform the trainee's Ripley ITT Personal Tutor at the start of this process.
Stage 2 Professional support plan	If the targets from stage 1 are not met within the agreed timescales, the Personal Tutor will meet with the trainee and subject mentor to put in place a *Professional Support Plan* which will last 2 weeks.
Stage 3 Cause for Concern Action Plan	If the targets from stage 2 are not met within the agreed timescales, the Personal Tutor will meet with the trainee and subject mentor to put in place a *Cause for Concern Action Plan* which will last 2 weeks. The SCITT Director will be informed.
Stage 4 Fitness to Practise Procedure	If the targets from stage 3 are not met within the agreed timescales, the SCITT Director will instigate the **Fitness to Practise Procedure** (see Section 4 of the current policy).

Further detail on the above procedures can be found in the Ripley ITT course handbooks.

Section 2: Cause for concern relating to professional progress

Requirements relating to the professional progress

Trainees' professional progress is assessed against the strands of the Ripley ITT curriculum during the course and the Teachers' Standards at the end of the course. Assessment processes are detailed in the relevant Ripley ITT Handbook. Ripley ITT course leaders and partnership school staff involved in the assessment of trainees are reminded of the paramount importance of early detection of underperformance.

All trainees will have times when they find some aspects of professional practice more challenging than others. This can be addressed through refining of weekly targets, provision of temporary additional support from the mentor, or by making small temporary adjustments to the trainee's timetable. If it becomes apparent at any point throughout the programme, however, that a trainee is not making satisfactory progress against the Ripley ITT curriculum and is therefore not on track to meet the end of stage criteria or, in the final stage, the Teachers' Standards, then the procedures, as detailed below, must be followed by all staff supporting the trainee. It is important that course leaders are informed immediately by the placement school's professional lead where there is a concern. This will ensure that appropriate supportive action for the trainee, mentor, school, and pupils is put in place as soon as possible.

Procedures for managing concerns relating to professional progress

If the causes for concern are so serious as to need immediate intervention because there is a significant impact on staff and pupils in the placement school, the Ripley ITT Director has the right to suspend a trainee from training with immediate effect and instigate Stage 5 of this procedure.

Stage 1 Informal school-based support	If course leaders or staff in partnership schools have reason to believe that a trainee's attitude, behaviour or conduct is not meeting the requirements set out in the Ripley ITT Code of Conduct or the Teachers' Standards, they will be informed of these concerns and the Subject Mentor and Professional Mentor (secondary) or Headteacher (primary) will discuss targets for improvement which will be noted on Mosaic in the usual way with a timescale for improvement of 2 weeks. The Subject Mentor should inform the trainee's Ripley ITT Personal Tutor at the start of this process.
Stage 2 Professional support plan	If the targets from stage 1 are not met within the agreed timescales, the Personal Tutor will meet with the trainee and subject mentor to put in place a *Professional Support Plan* which will last 2 weeks.
Stage 3 Cause for Concern Action Plan	If the targets from stage 2 are not met within the agreed timescales, the Personal Tutor will meet with the trainee and subject mentor to put in place a *Cause for Concern Action Plan* which will last 2 weeks. The SCITT Director will be informed.
Stage 4 Fitness to Practise Procedure	If the targets from stage 3 are not met within the agreed timescales, the SCITT Director will instigate the **Fitness to Practise Procedure** (see Section 4 of the current policy).

Further detail on the above procedures can be found in the Ripley ITT course handbooks.

Section 3: Cause for concern relating to health issues

In this context of this policy, 'health issues' are defined as physical or mental health conditions that are long-term, untreated, or unacknowledged and impair a person's ability to engage with the initial teacher training programme and practice without supervision.

'Health issues' do not include disabilities or health conditions that are managed and do not impair a person's ability to engage with the initial teacher training programme and practice without supervision. They also do not include occasions of temporary illness that are not long-term, persistent, or repeated.

The following is a non-exhaustive list of health issues with the potential to impact on a trainee's professional performance, and which are likely to lead to a Cause for Concern and potentially Fitness to Practise Procedures being invoked on health grounds:

- Chronic alcohol or drug abuse.
- Severe or relapsing mental illness.
- Chronic pain that is ignored or unmanaged.
- Failure to comply with a treatment programme or to maintain medication.
- Failure to disclose medical conditions impacting on ability to engage with the training programme.
- Failure to practice safely, including preventing transmitting infection to others.
- A medical or physical condition such that it would be impossible to serve as a teacher.
- Persistent or frequent absences due to health issues which impact on ability to engage with the training programme and make progress towards achieving QTS.

Trainee responsibilities

Trainees recruited to the Ripley ITT programme will be required, as a condition of entry, to demonstrate that they meet the health requirements set out in the ITT Criteria and the Higher Education Occupational Health Practitioners guidance in order to engage with an initial teacher training programme and meet the Teachers' Standards.

All candidates who accept offers with Ripley ITT will be required to complete a health questionnaire provided by Ripley ITT's Occupational Health Services Provider prior to commencing the course. This initial questionnaire may be followed up by the Occupational Health Services Provider by a phone call to establish further facts. This report will be made available to Ripley ITT in order to make informed decisions about suitability for the programme and any reasonable adjustments which can be put in place to support training.

Candidates are required to inform Ripley ITT prior to admission about any conditions for which reasonable adjustments within the meaning of the Equality Act 2010 may need to be made to selection processes or programme arrangements.

Once on the programme, a trainee whose physical or mental health deteriorates should seek advice from the course leaders about the implications for their continuation on the programme or their entry to the teaching profession. Trainees are required to inform their course leaders of any changes in their physical or mental health which could affect their fitness to practice.

Procedures for managing concerns relating to health issues

If the causes for concern are so serious as to need immediate intervention because there is a significant impact on staff and pupils in the placement school, the Ripley ITT Director has the right to suspend a trainee from training with immediate effect and instigate Stage 5 of this procedure.

Stage 1

If course leaders or school staff have concerns regarding a trainee's health issues, the trainee will be invited to attend a meeting with the Ripley ITT Director to discuss this. The trainee will be invited to be accompanied if they wish. The trainee will be invited to share their perspective and present any information or evidence relevant to the concern. A written record of this meeting will be made and provided to the trainee within 48 hours of the meeting, outlining:

- the areas of concern and the implications for the trainee in meeting the Teachers' Standards and gaining QTS.
- information or evidence presented by the trainee relevant to the concern.
- any decisions made in the meeting regarding further actions, including whether:
    - the trainee's health **does not raise serious concerns** about their fitness to practice. In which case, either no further action will be taken or the Ripley ITT Director may refer the trainee for medical help as appropriate, and the trainee's progress will be monitored as necessary.
    - the trainee's health **does raise serious concerns** about their fitness to practice. In which case the trainee will be suspended from training and referred to Ripley ITT's Occupation Health Services Provider for assessment (Stage 2 current process).
    - the trainee wishes to withdraw voluntarily from the course

Where the trainee fails to attend the interview without good cause, the trainee will be referred to Ripley ITT's Occupational Health Services Provider to carry out an assessment (Stage 2 of current process). If the trainee refuses to engage with the occupational health assessment without good cause, the Ripley ITT Director has the right to suspend the trainee from training with immediate effect and instigate Stage 3 of this current process.

Stage 2

If the Ripley ITT Director decides the trainee's health **does raise serious concerns** about their fitness to practise, the trainee will be suspended from training pending an assessment by the Ripley ITT's Occupational Health Services Provider. The Ripley ITT Director will use the occupational health report, along with the information and evidence considered at Stage 1, to decide whether:

- the trainee can resume their training without further action. The Ripley ITT Director may refer the trainee for medical help as appropriate, and the trainee's progress will be monitored as necessary.
- the trainee can resume their training with support or supervision as recommended by the occupational health advisor. The Ripley ITT Director may refer the trainee for medical help as appropriate, and the trainee's progress will be monitored as necessary.

- the Ripley ITT Director considers the trainee unfit to continue on the course and the steps outlined in Stage 3 should be followed.

The trainee should be informed of the course leaders' decision in writing within 48 hours of course leaders receiving the occupational health report.

Stage 3

If the trainee has not engaged with the occupational health assessment process of if following Stage 2, the Ripley ITT Director considers the trainee unfit to continue on the course, the Fitness to Practice Hearing procedures outlined in Section 4 should be followed.

Section 4: Fitness to Practise Process

It a trainee fails to meet the targets set out in a Cause for Concern Action Plan or where a cause for concern which directly impacts the trainee's fitness to practice is raised a Fitness to Practise Process will be undertaken.

There are four potential stages within the Fitness to Practise Process as follows:

1. Informal Stage
2. Formal Stage
3. Review Stage
4. Independent external review (OIA)

Please note that audio and/or video recording of any discussions or meetings by Trainees at any stage of this policy is strictly prohibited. Any breach of this direction may be treated as a serious disciplinary issue.

A written record of the meeting will be and provided to the trainee within 48 hours outlining:

- the areas of serious concern and the implications relating to the trainee not meeting the Teachers' Standards;
- information or evidence provided by Ripley ITT and school staff relevant to the concern;
- information or evidence provided by the Trainee relevant to the concern;
- any decisions made in the meeting regarding further actions.

Stage 1: informal procedure

The Ripley ITT Director will:

- notify the trainee of the nature of the concern in writing;
- arrange an informal meeting with the Trainee;
- listen to the Trainee's version of events;
- consider the support already put in place to help the Trainee;
- advise the Trainee of any further support available at this stage;
- decide whether further investigation is necessary;
- make a decision on next steps.

At this stage there are 4 possible outcomes:

1. The concern is discussed with the Trainee and not taken further.
2. The Ripley ITT Director seeks further investigation and alerts a member of the Executive Steering Group to the concern.
3. A specified outcome is given. This may include:
    a. a verbal warning;

b. permission to continue on the programme under close supervision;

c. a Personal Support Plan;

d. advice to self-refer to GP;

e. referral to the process in Section 3 – Cause for Concern relating to Health Issues

4. Suspension or continued suspension from training pending further actions in line with Stage 2 of the current procedure. Ripley ITT and South Cumbria ITT reserve the right to suspend a trainee from their training if an allegation is deemed to pose a potential risk to members of the Ripley ITT programme, its partner schools or pupils.

A written record of the meeting will be and provided to the trainee within 48 hours outlining:

- the areas of serious concern and the implications relating to the trainee not meeting the Teachers' Standards;
- information or evidence provided by Ripley ITT and school staff relevant to the concern;
- information or evidence provided by the Trainee relevant to the concern;
- any decisions made in the meeting regarding further actions.

Stage 2: formal procedure

Investigation

Where a trainee's Fitness to Practise is being considered because of previous findings under the Ripley ITT's disciplinary process or as a result of a criminal conviction, a formal investigation of fact is not generally required and the evidence available from a previous process may suffice to cover the issues being examined at Stage 2 of this policy. Otherwise, an investigation will be required to establish the facts of the case in accordance with the procedure set out below. The Investigating Officer should have had no previous involvement in the case.

Conduct and character

If the concern relates to the Trainee's conduct or character, an Investigating Officer (normally a Ripley ITT Deputy Director) will be assigned to examine and explore the concern in greater detail.

The Investigating Officer may interview the trainee and other relevant people during this process.

The purpose of the investigation is to:

- identify the exact nature of the concern(s)
- identify, collate and analyse all relevant information exploring the concern(s)
- identify whether the information gathered points to a risk to young people, breach of the Professional Standards for Teachers, breach of professional trust or impacts on the reputation of the teaching profession.

The Investigation report along with the supporting evidence will be reviewed by the SCITT Director.

The SCITT Director will:

- review the report and decide on appropriate actions
- write to the Trainee informing them of the decisions

- make suggestions for future learning and support that is available

The SCITT Director may meet with the Trainee to discuss the outcomes of the investigation.
At this stage, the possible outcomes are the Ripley ITT Director:

1. grants the trainee permission to continue on the programme without change.
2. grants the trainee permission to continue on the programme with a proviso.
3. grants the trainee permission to continue on the programme with a formal written warning on file (see below).
4. considers the trainee to be unfit to continue training and advises the trainee to withdraw from the course (see below)

Written warning - If a written warning or sanction is given the following information will be given to the Trainee in writing:

- the reason for the warning or sanction
- the intended purpose of the warning or sanction
- the expected duration of the warning or sanction
- whether or not the trainee's Fitness to Practise will be considered again.

If the trainee is considered unfit to continue training and is advised to withdraw from the course but chooses not to, a Fitness to Practise Hearing will be convened as follows:

Fitness to Practise Hearing

The Trainee will receive notification in writing of:

- The date, time and venue of the Hearing
- Details of the composition of the panel
- Notification of their right to be accompanied by a friend or Trade Union representative (no legal representatives will be permitted)
- A copy of the information to be considered at the Hearing
- The deadline by which the Trainee can submit any additional information pertaining to the case (after which the additional information will not be taken into account)

If the Trainee has a disability and requires special arrangements or reasonable adjustments before or during the hearing they should inform the Fitness to Practise Committee well in advance of the meeting.

Attendance at the Committee Hearing is obligatory. If a trainee is absent due to illness they must supply a medical certificate. If the Trainee is absent without reasonable explanation the Committee can consider the case in their absence.
The Committee, drawn from three members of the Executive Steering Group, will:

- confirm that the Trainee has received all the relevant paperwork
- ask the Investigating Officer to summarise their findings of the investigation that has taken place

- ask the Trainee questions relating to different aspects of the case
- adjourn the hearing to allow the committee to deliberate and reach an outcome

At this stage, the possible outcomes are:

1. That the Trainee is not Fit to Practise and:

    - is suspended from training until such a time as undertakings, recommendations or conditions by the committee have been met
    - dismissed from the Ripley ITT SCITT programme

2. The Concern is dismissed

    The Committee will inform the Trainee of a remedy and whether an apology is required.

3. Permission to continue on the programme with a formal written warning on file.

    The Committee will write to the Trainee informing them on their decision.

Appeals

The Trainee has the right to appeal against the decision of the Fitness to Practise Committee Hearing.

If the Trainee wishes to appeal, they should inform the Chair of the Committee in writing outlining the reasons for the appeal within 10 working days of the outcome having been given to the Trainee.

Stage 3: Review Stage (final internal Ripley ITT stage)

If the Trainee is dissatisfied with the outcome of the formal stage, he or she can request a review. A review may cover:

- a review of the procedures followed at the formal stage
- a consideration of whether the outcome was reasonable
- any new material evidence that the Trainee was unable, for valid reasons, to provide at Stage 2

The review will not:

- re-hear the complaint afresh
- involve a further investigation

An appeal must have been considered at the formal stage (Stage 2) before it can be escalated to the review stage.

If an appeal reaches this stage, a Review Panel drawn from Ripley ITT SCITT Executive Steering Group will consider the way in which the complaint was investigated in Stage 2. The Trainee will be invited in writing to attend a hearing and given 10 school days' notice of the hearing date.

- Trainees will be offered the opportunity to be accompanied by a friend, family member or representative from a Teaching Union or Students' Union (legal representative will not be permitted).

- The Trainee will be provided with information about the composition of the panel, a copy of the evidence to be considered and information about the support that is available to them including contact details.

- The panel will consist of three members of the Executive Steering Group. They will consider the evidence.

- A record of the meeting will be taken recording the date, people in attendance and a brief summary of the meeting.

The Panel will consider the following questions:

- Were the relevant procedures followed during the formal stage?
- Was the outcome reasonable in all the circumstances?
- Has the Trainee received clear reasons why the appeal was rejected at the earlier stage?
- If new material evidence has been provided, has the Trainee given valid reasons for not supplying this earlier?
- If new material evidence is submitted, would this have altered the determination at Stage 2?

The Review Panel, having considered the material submitted to them may:

1. overturn the outcome of the formal stage and recommend a remedy
2. refer the appeal back to the formal stage for reconsideration
3. uphold the outcome of the formal stage.

The Chair of the Review Panel will write to the Trainee with their decision and an outline of the reasons for their decision within three working days of the hearing. Where appropriate, this letter will also advise the Trainee on their right to appeal to the OIA, the time limit for doing so and where and how to access advice and support with this process.

Stage 4: Independent External Review (OIA)

Once the review stage is completed, the Trainee is entitled to ask the Office of the Independent Adjudicator for Higher Education (OIA), the independent ombudsman service, to review his or her appeal about the outcome of the Ripley ITT SCITT Fitness to Practise process. The appeal should be submitted to the OIA within 12 months of the date of the Completion of Procedures letter from the Chair of the Review Panel.

1. Data Protection

- Ripley ITT will retain data related to the investigation for 7 years from the start of the investigation and after this time all data will be deleted. All data will be stored securely during this time.

- All investigations will be treated confidentially. Ripley ITT will only disclose information to those who need it to investigate or to respond to the issues raised.

- When a Trainee responds to an investigation they should only include any necessary information about third parties. Evidence provided must focus on the impact that a third party has had on the Trainee themselves and kept to that which is necessary for the submission being made. For example, if the investigation is based on the health of a family member, Ripley ITT does not need to see the detailed medical information about that person.