

Reflection and Development Plan Policy

Scope

This Policy is designed to assist academic and practice staff in managing and addressing concerns regarding students' character, professional conduct, competency, health, and/or well-being within the university environment and placement settings. The primary goal is to adopt a supportive, restorative, and reflective approach at the earliest stage that facilitates student development and paves the way for academic and professional success.

The Policy is designed to ensure that concerns are addressed promptly, fairly and in a manner that is beneficial to the student's development. The primary objective is to encourage a proactive rather than punitive approach focussing on support, guidance and restorative practises leading to positive change.

The Policy applies to all undergraduate, postgraduate, and doctoral students enrolled in School of Health & Psychological Sciences (The School) programmes, especially those programmes associated with Professional, Statutory and Regulatory Bodies (PSRBs).

Equality and Diversity Statement

City, University of London is committed to promoting equality, diversity and inclusion in all its activities, processes, and culture, under its Public Sector Equality Duties and the Equality Act 2010. This includes promoting equality and diversity for all, irrespective of any protected characteristic, working pattern, family circumstance, socio-economic background, political belief or other irrelevant distinction.

Where relevant to the Policy, decision making panels will ensure a reasonable gender balance and will actively consider representation of protected characteristics.

To be read in conjunction with:

This Policy should be read in conjunction with the Student Learning Agreement, Student Charter, Student Conduct Guidance, Programme Handbook, Support for Study Policy, Interruption of Study Policy, the University Senate Regulations 13 Student Disciplinary and 19 Assessment Regulations, the relevant PSRB Codes and Standards, Fitness to Practise (Train) Policy, Precautionary Suspension from Practice Policy, Disclosure and Barring Service Policy, and any other relevant policies and procedures as deemed necessary.

Disclaimer

The information in this Policy is correct at the time of review in October 2023. The School reserves the right to make amendments to the policy provided that such amendments are: (i) as a result of changes to PSRB requirements (ii) as a result of unforeseen events or circumstances beyond City's control or (iii) are deemed reasonably necessary by City.

In the event that amendments are made, the University shall take reasonable steps to notify relevant parties as soon as is reasonably possible.

Introduction

- a) The School seeks to create:
 - an open, flexible and transparent culture to resolve issues as they arise;
 - an environment where mental health and other health issues can be openly discussed;
 - a culture of equality and diversity in line with principles outlined by the Equality Act 2010.
- b) When students' conduct or health becomes a cause for concern it is essential that:
 - all parties feel confident and supported to raise issues;
 - students are given the appropriate support and guidance to continue their studies.
- c) This Policy ensures that students are given every opportunity and support to improve their performance whilst managing any areas of concern(s). The School will work with relevant support services within the University to ensure reasonable adjustments, if feasible, are in place for the student.
- d) Students are required to demonstrate not only academic ability but also personal and professional commitment to their chosen profession at the point of admission to and throughout their training/academic programme.
- e) Any student aspiring to gain entry to their chosen profession is required to adhere to their relevant professional code of conduct. This code of conduct underpins the competencies for practice throughout the programme.
- f) On occasions, student conduct may become the subject of concern(s) about their suitability to enter the profession and fitness to practise (train) in one or more of areas.

Application of this Policy

- g) The School will at all times consider the most appropriate process to be followed when managing concerns about students' character, professional conduct, competency, health, and/or well-being.
- h) The School has a duty of care towards its students' health and well-being, and will ensure it continues to provide support whilst undertaking their studies and through to the conclusion of the process.
- i) This Policy outlines the process to ensure that concerns about students' character, professional conduct, competency, health, and/or well-being are managed appropriately and promptly through an agreed and supportive action plan.
- j) This Policy is not intended to deal with students' issues solely related to their academic performance. However, if allegations of academic misconduct or disciplinary offence are raised during consideration under City's relevant procedure and/or, information or evidence raises questions about conduct and/or students' fitness to practise (train), those issues may be referred for consideration under this Policy to the appropriate policies such as Fitness to Practice (Train), Academic Misconduct or Student Disciplinary.
- k) Students may be removed/suspended without notice from a placement environment in accordance with the School's Precautionary Suspension of a Student from Placement Policy, or any other relevant University Policy, where the student's behaviour gives rise to concerns regarding their fitness to practise (train) that may be detrimental to the service

user or the placement, or situations where students are at risk, for example, due to their mental health.

- All students on a programme of study leading to eligibility to apply for registration with a PSRB will be required to sign a self-declaration of good health and good character at relevant intervals throughout the programme. This requirement will be monitored and recorded by programme staff and will be reported, where applicable at the relevant Assessment Board.
- m) The School will ensure that accurate records of proceedings are maintained and are shared with the student to allow for a fair and transparent process. Records can be called upon by future panels and external organisations such as PSRBs, Office for Students (OfS), The Office of the Independent Adjudicator for Higher Education (OIA) in relation to accreditation or student appeal.

Equality Act 2010, GDPR and Data Protection Act 2018, and Freedom of Information Act 2000

n) The Policy will be operated in accordance with the University's duties under the Equality Act 2010, the Data Protection Act 2018, and Freedom of Information Act 2000. Staff operating the Reflection and Development Plan Policy should refer to the guidance below for further information about student confidentiality. Personal data and special category data is processed in order to comply with City's public task, and in accordance with the Data Protection Act 2018.

Confidentiality

- o) This Policy will be operated with due consideration to students' confidentiality.
- p) The School will seek students' informed consent before disclosing students' sensitive information to a third party and will consider students' best interests prior to disclosure. Where possible, information will be disclosed in accordance with the terms agreed with students.
- q) The School will respect students' right to choose not to provide consent for sensitive information to be disclosed but will ensure students are made aware of the implications of nondisclosure.
- r) City, University of London's obligations of confidentiality shall not apply in relation to information which:
 - i. is or becomes public knowledge other than as a result of a breach of confidentiality by City, University of London;
 - ii. is required to be disclosed under its PSRB requirements (e.g., the Nursing and Midwifery Council, Health and Care Professions Council, General Optical Council);
 - iii. is required to be disclosed by law;
 - iv. is required to give proper instructions to any professional adviser who has an obligation to keep any such information confidential; and
 - v. will impact on City, University of London's duty of care to public and student safety, and to maintain public confidence in the relevant healthcare profession.

Reflection and Development Plan Process

Reflection and Development Plan Referral

1.1 A Reflection and Development Plan Referral is a structured approach to proactively address concerns about a student's character, professional conduct, competence, health, or well-being. This process seeks early intervention, fostering a proactive, supportive, and constructive dialogue between the student and academic and practice. Through the referral, both staff and students can quickly highlight concerns, ensuring that a tailored, beneficial action plan is collaboratively developed, reflecting the University's commitment to student development, public safety, and a culture of transparency, equality, and respect.

- 1.2 A Reflection and Development Plan should refer to specific incidents and provide detail and evidence so that it is clear to follow.
- 1.3 If the concern(s) remains unresolved this may lead to a referral to a Fitness to Practise (Train) (FtP) Panel for consideration. All documents and action plans from the Reflection and Development Plan process will be vital evidence for the Panel's decision-making. Therefore, it is imperative that accurate record-keeping is maintained throughout the process and shared as evidence as part of an FtP referral.

Possible Grounds for Referral to the Reflection and Development Plan Process

A student may be referred for the following possible areas:

2.1 Concerns about character, professional conduct and/or competency

It is important to uphold professional standards at <u>all times</u> (in and out of the workplace) to ensure public trust and confidence in the profession, in line with the requirements of the PSRBs.

Concerns of breach of character, professional conduct and/or competency which may bring your profession into disrepute include but are not limited to:

- Unsafe practice
- Lack of honesty and integrity
- Lack of professionalism
- Suggestions of harm to another person
- Breach of confidentiality
- Sexual, racial or other forms of harassment
- Bullying
- Poor timekeeping
- Inappropriate behaviour (rudeness, aggression, dress and not following instruction when appropriate)

2.2 Concerns about students' health and well-being

Students must demonstrate that they are of good health, which means that they are capable of safe and effective practice either with or without reasonable adjustments. This does not mean the absence of a health condition or disability. However, if ill health affects the achievement of learning outcomes and/or behaviour during the programme it needs to be considered accordingly. Health concerns must be dealt with and reviewed in accordance with occupational health guidance, and relevant University guidance. It may be advisable to hold a case conference with relevant health and support services within the University, in order to assess the case, support students, and agree the best options in addressing concerns about health.

Reasonable adjustments to allow students to undertake the programme should be considered at the point of admission, and during any point of the programme, as appropriate, and in accordance with relevant University guidance. It should be noted that mandatory requirements of the programme must be met in order to successfully complete the programme, which may impede on instigating reasonable adjustments.

Throughout the duration of their study, students are required to disclose any relevant health or character concerns at the earliest opportunity to their Programme Director. Students who do not disclose any relevant health or character concerns would be subject to the initiation of the Fitness to Practise (Train) Process at the appropriate point. Non-disclosure may automatically be deemed a serious fitness to practise (train) issue.

2.2.1 Interruption of Study

Students may take a negotiated break from their programme of study in line with the Interruption of Study Policy. If students breach PSRB requirements on good health or there are multiple interruptions of study, a referral to Fitness to Practise (Train) process on the basis of health and well-being concerns may be triggered following advice from the Dean (or nominee).

- 2.3 There may be other referrals via different processes in the School:
 - 2.3.1 Disclosure and Barring Service (DBS) Process
 - Concerns about cautions, convictions and/or non-convictions.
 - 2.3.2 Academic Misconduct Process
 - Concerns following an allegation of academic misconduct.

Immediate Referral to Fitness to Practise (Train) Panel

3.1 There may be occasions when a student's conduct is deemed sufficiently serious or an individual's safety or safety of others is compromised such that it may be necessary for immediate referral to a Fitness to Practise (Train) Panel.

Precautionary suspension from practice

4.1 If an allegation is considered serious the Programme Director or Practice Staff may arrange a precautionary suspension from practice even at an informal stage to protect the student and/or members of the public.

Informal resolution

5.1 If a staff member, either academic or practice-based, identifies or is notified of an issue and deems it safe to address, they should discuss it with the student promptly. This is to prevent the matter from escalating into a Reflection and Development Plan. Such discussions should occur within 10 working days of becoming aware of the issue. A summary of the meeting should be shared and agreed with the student for fairness and transparency.

Referral to the Reflection and Development Plan Process

- 6.1 If a staff member, either academic or practice based, believes a student's conduct requires formal intervention, they should raise the issue with the Programme Director (PD) using a Reflection and Development Plan Form, clearly detailing the issue and/or incident with supporting evidence. If the issue is raised by a member of the public or fellow student, a member of staff will normally act as the liaison to complete the form. This should be done immediately after the issue or event takes place, within 10 working days.
- 6.2 The student must be informed in writing that a Reflection and Development Plan referral has been raised, within 10 working days, and advised gain support from their Personal Tutor and the Students' <u>Union Advice</u> (Advice Service) in order to provide a reflective written statement in response to the issue(s) raised prior to an investigatory meeting.

Reflection and Development Plan Initial Investigatory Meeting

- 7.1 An Initial Investigatory Meeting should normally be held between members of academic/practice staff with immediate knowledge of the concern, the student and the Programme Director (PD) or their nominee within 10 working days, following receipt of the Reflection and Development Plan form. The Course Officer or their nominee will be in attendance to provide secretarial support and where applicable, provide details of the student's record. Students should be encouraged to contact the Students' Union to arrange representation.
- 7.2 This meeting will identify the nature of the issue(s) raised in the referral, consider the student's response in relation to the early resolution of the issue and set out an action plan.

Supportive Action Planning

- 8.1 Action Plans should include the following aspects:
 - Identify Concerns;
 - Agree Action/targets;
 - Explicitly state how the issues are to be resolved with specific success criteria;
 - Agree on a support plan;
 - A date for review (if necessary);
 - Signed by the student;
 - Signed by the Programme Director;
 - Identified support with Personal Issues (e.g. Student Health Service; Occupational Health; Disability Support; Support for Care Leavers) https://www.city.ac.uk/lead/learning-teaching-support/personal-tutoring/where-to-get-support;

- Identified support with Academic Issues and Personal Development (e.g. Learning Support; Careers Service and Library) https://www.city.ac.uk/lead/learning-teaching-support/personal-tutoring/where-to-get-support.
- 8.2 For early resolution, consider options like consulting the Occupational Health Service or accessing City's Student Services such as Student Health and Wellbeing, Student Welfare. The action plan should clearly state its timeframe, be mutually agreed upon by all parties, and reflect the nature of the issues of the referral. The student must receive a copy, and another should be retained in their official file.
- 8.3 If the student disputes the grounds for a Reflection and Development Plan referral, the Programme Director and relevant Associate Dean for Programmes will evaluate the evidence and decide on the appropriate course of action.

Reflection and Development Plan Initial Investigatory Meeting Outcomes

- 9.1 There are four possible outcomes:
 - 9.1.1 To continue with the Reflection and Development Plan process for this student and develop an action plan.
 - 9.1.2 To find the Reflection and Development Plan referral unsubstantiated, and no further action is needed.
 - 9.1.3 To undertake a further investigation into the allegation.
 - 9.1.4 If a student's character, professional conduct, competence, health, or well-being is deemed sufficiently serious or the safety of others is compromised, either during the initial investigatory meeting or following progress reviews, a direct referral to a Fitness to Practise (Train) Panel can be made.
- 9.2 There may be a maximum of two progress review meetings to monitor progress. At each meeting, the student should meet with the member of academic/practice staff with immediate knowledge of the concern and the Programme Director or their nominee.
- 9.3 At the first progress review meeting, progress with the initial investigatory meeting action plan should be reviewed with the following possible outcomes:
 - 9.3.1 Where a student satisfies the action plan, the decision is made that the issue/concern has been resolved and that the Reflection and Development Plan process should be closed.
 - 9.3.2 Where a student only partially satisfies or does not satisfy the action plan and programme-specific procedures, the student will receive a warning. Continued non-compliance will lead to a referral to the Fitness to Practise (Train) Panel, which could affect their programme progression. A second progress review meeting will be scheduled.
- 9.4 At the second progress review meeting, progress with the action plan from the first progress review meeting should be reviewed with the following outcomes:
 - 9.4.1 Where a student satisfies the second progress review meeting action plan: the decision is made that the issue/concern has been resolved and that the Reflection and Development Plan process should be closed.

- 9.4.2 Where a student only partially satisfies or does not satisfy the second progress review meeting action plan and the programme specific procedures: the decision is made to refer the student to the Fitness to Practise (Train) Panel.
- 9.5 The Course Officer will log the Reflection and Development Plan outcome and any issue(s) will remain on the student's file for one year depending on the gravity of the concern.
- 9.6 All parties involved should be informed of outcomes at each stage. All documentary evidence will be made available to all parties throughout the process including referral to a Fitness to Practise (Train) Panel and any appeal (unless material must be excluded for data protection or other compliance reasons).

Referral to Fitness to Practise (Train) Panel

10.1 Where it has not been possible to resolve the issue(s) through the Reflection and Development Plan process and there are ongoing significant concerns, the student must be informed in writing that they have been referred to the Fitness to Practise (Train) Panel and provided with a copy of the School's Fitness to Practise (Train) Policy.

Professional Statutory and Regulatory Bodies Regulations, Standards and Code of Practice

This list is not exhaustive and checks should also be made to ensure the appropriate Code of Practice is applied where the relevant PSRB is not listed within this document.

Nursing and Midwifery Council

https://www.nmc.org.uk/

<u>The Code - Professional standards of practice and behaviour for nurses, midwives and nursing associates</u>

https://www.nmc.org.uk/standards/code/

Guidance on health and character of a student

https://www.nmc.org.uk/education/becoming-a-nurse-midwife-nursing-associate/guidance-for-students/

Guidance on using social media responsibly

https://www.nmc.org.uk/standards/guidance/social-media-guidance/

Understanding Fitness to Practise

https://www.nmc.org.uk/ftp-library/understanding-fitness-to-practise/

Health and Care Professions Council

https://www.hcpc-uk.org/

Standards of Conduct, Performance and Ethics

https://www.hcpc-uk.org/standards/standards-of-conduct-performance-and-ethics/

Guidance on Conduct and Ethics for Students

https://www.hcpc-uk.org/students/guidance-on-conduct-and-ethics/

Guidance on the use of social media

https://www.hcpc-uk.org/standards/meeting-our-standards/communication-and-using-social-media/guidance-on-use-of-social-media/

How the Standards apply to students

https://www.hcpc-uk.org/students/how-the-hcpc-standards-apply-to-students/

Standards of proficiency for speech and language therapists

https://www.hcpc-uk.org/standards/standards-of-proficiency/speech-and-language-therapists/

Standards of proficiency for radiographers

https://www.hcpc-uk.org/standards/standards-of-proficiency/radiographers/

Student Hub

https://www.hcpc-uk.org/students/

Fitness to Practise

https://www.hcpc-uk.org/concerns/what-we-investigate/fitness-to-practise/

General Optical Council

https://www.optical.org/

Code of Conduct

https://optical.org/en/publications/code-of-conduct/

Standards for optical students

https://optical.org/en/standards-and-guidance/standards-for-optical-students/

Annexe A: Guidance Note for Addressing Student Fitness to Train Concerns Prior to the GOC

University/Senate Regulations and Policies

University Senate 13 Student Disciplinary

https://www.city.ac.uk/about/governance/policies/city-university-of-london-senate-regulations

University Senate 19 Assessment Regulations

https://www.city.ac.uk/about/governance/policies/city-university-of-london-senate-regulations

Fitness to Practise (Train) Policy

https://www.city.ac.uk/about/governance/policies/student-policies-and-regulations

Disclosure and Barring Service Process

https://www.city.ac.uk/ data/assets/pdf file/0007/583594/SHS-DBS-Process-fina.pdf

Support for Study

https://www.city.ac.uk/ data/assets/pdf file/0004/386806/Fitness-to-Study-Policy.pdf

Interruption of Studies and Withdrawal Policy

https://www.city.ac.uk/ data/assets/pdf file/0011/283088/Interruption-of-Studies-and-Withdrawal-Policy.pdf

Precautionary Suspension of a Student from Placement

https://www.city.ac.uk/ data/assets/pdf file/0005/583601/Precautionary-Suspension-from-Practice.pdf

Safeguarding Policy

https://www.city.ac.uk/__data/assets/pdf_file/0003/728445/Safeguarding-at-City-Policy.pdf

Data Protection Policy

https://www.city.ac.uk/about/governance/policies/data-protection-policy

Policy Title: Reflection and Development Plan Policy	
Policy Enabling Owner and Department The School of Health & Psychological Sciences	Responsible for Implementation and Department School
Approving Body	Date of Approval:
Board of Studies	24/10/23
Last Reviewed & Version 16/10/23 Version 1	Review Due Date September 2024
Publication of Policy	
For public access online (internet)?	For staff access only (intranet)?
Website Link: https://www.city.ac.uk/about/governance/policies/student-policies-and-regulations	Intranet Link: n/a
Storage of Policy (Previous versions of the policy must be stored in the drive by the author)	
Drive Address reg-dev	
Queries about this policy should be referred to SHPS Quality and Compliance Manager	
SHPS Quality and Compliance Team Student and Academic Administration	