Consultation: Proposed Sanctions Policy – 2025

1. Introduction

We are a regulator of health and care professionals established by the Health Professions Order 2001. Our statutory role is to protect, promote and maintain the health and safety of the public; promote and maintain public confidence in the professions we regulate; and promote and maintain professional standards and conduct for members of those professions.

We promote high quality professional practice, regulating 15 health and care professions by:

* setting standards for education and training and practice;
* approving education programmes which professionals must complete to register with us;
* maintaining a register of professionals who meet our standards;
* acting if professionals on our Register do not meet our standards; and
* acting to stop unregistered practitioners from using protected professional titles.

The sanctions policy guides practice committee panels (panels) in determining appropriate sanctions in fitness to practise cases. It is designed to support panels in making fair, consistent, and transparent decisions, ensuring that regulatory outcomes maintain public confidence and uphold professional standards. We last updated the document in 2019.

This consultation sets out the proposed changes to our sanctions policy.

We encourage you to read the background information set out in the [consultation document and proposed sanctions policy](https://www.hcpc-uk.org/sanctions-policy-consultation/) before you answer the survey questions. The survey should take around 10-15 minutes to complete. Your answers are essential to shaping the future of the sanctions policy.

This consultation will close at 11.59pm on Monday 1 September 2025.

If you are unable to respond using the online platform, or would like a version in Welsh or in an alternative format, please email consultation@hcpc-uk.org or write to:

 Health and Care Professions Council,

 Park House, 184-186 Kennington Park Road

 London, SE11 4BU

Thank you for participating!

1. How we will use the information you share

We want to be transparent about the nature of the consultation we are conducting, the way in which the data is collected and how we will use survey results.

The information you provide will be treated as confidential and will only be used for consultation purposes and internal decision making. Your comments will not be identified as belonging to you. Instead, they will be combined with those gathered from other survey participants and will be analysed as part of a group.

Survey responses will not be published on our website. We may publish aggregated information about consultation responses and share this information with stakeholders. However, survey responses will be anonymised before disseminating.

We may use your details to contact you in the event we have any questions about your response.

We will handle any personal data received in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

We are required to adhere to the Freedom of Information Act 2000. The act provides public access to information held by public authorities. We will comply with our obligations under the Act and the relevant Information Commissioner's Office codes of practice when responding to requests. For more information, please email foi@hcpc-uk.org.

Privacy notice:

This survey is published and managed by Health and Care Professions Council (HCPC). We are committed to protecting your personal information and respecting your privacy. Personal information is any that identifies you or would enable you to be identified, such as phone numbers, your address and email address.

We will take all necessary steps to make sure that the personal information you provide is processed fairly and lawfully. Only authorised staff have access to personal information, and they are obliged to respect its confidentiality. We will not sell, rent or exchange any personal information supplied by you to any third party. We will not use any of the information you provide for direct marketing or other non-research activities.

You can find more information about your rights and how we use personal data in our privacy notice, which is available on our [HCPC data protection policy and privacy notice](https://www.hcpc-uk.org/about-us/corporate-governance/policies/data-policy-and-terms/).

If you have any further questions about this consultation, please email consultation@hcpc-uk.org.

1. Individual or Organisation
2. Are you responding to this consultation on behalf of an organisation?

[x]  Yes

[ ] No

*If yes, please proceed to question 2 below. If no, please proceed to question 6.*

For those responding on behalf of an organisation.

1. Full name of your organisation: Click or tap here to enter text.
2. Category that best describes your organisation: Choose an item.
3. Where is your organisation active?: Choose an item.
4. Contact email for your organisation: Click or tap here to enter text.

*If you are responding on behalf of an organisation, you may now proceed to Section 5 to respond to the consultation.*

For those NOT responding on behalf of an organisation.

1. Your email address: Click or tap here to enter text.
2. Are you an HCPC Registrant?:

[ ] Yes

[ ] No

*If yes, please respond to question 8. If no, please skip to question 11.*

1. What is your registered profession?: Choose an item.
2. If dual or multiple registered, what professions?: Click or tap here to enter text.
3. Where is your regular place of work or activity?: Choose an item.

*If you are an HCPC registrant, you may proceed to Section 4.*

1. How would you best describe yourself?: Choose an item.
2. Where is your primary place of residence?: Choose an item.

*Your primary place of residence being the place you spend the majority of your time living and sleeping.*

1. Equality, Diversity and Inclusion Questions (Optional)

HCPC is committed to ensuring that we understand and respond appropriately to the diverse needs of our registrants and patients/service users.

The next set of questions are designed to help us better understand how our proposal might impact on specific groups of people.

Answering the questions in this section is at your discretion, but we would value any information that you are happy to provide.

1. Age: Choose an item.
2. Disability: Choose an item.

*Disability is defined as 'a physical or mental impairment which has a substantial and long-term adverse effect on a person's ability to carry out normal day-to-day activities.' You may have none, one, or more conditions that you believe are covered by this definition. Please answer how you feel this definition applies to you.*

1. Ethnicity: Choose an item.

*Ethnicity is defined as including colour, ethnic or national origin, or nationality. Please choose whichever answer best reflects how you think of yourself.*

1. Sex: Choose an item.

*This is your recorded sex at birth. For births registered in the UK, this will either be male or female. However, some other countries may include 'intersex' as an option.*

1. Gender Identity: Choose an item.

*We would also like to know if your gender identity is different from the sex recorded at birth. Your gender identity may be the same as your sex, but it may be different. You may identify as the opposite gender to your assigned sex, you may identify with neither, or with a self-described gender identity.*

1. Sexual orientation: Choose an item.
2. Marital or civil partnership status: Choose an item.

*In the UK, opposite sex couples and same sex couples may choose to marry, or they may choose to enter into a civil partnership.*

1. Pregnancy and maternity: Choose an item.

*The Equality Act 2010 defines 'pregnancy' as the condition of being pregnant or expecting a baby, and 'maternity' refers to the period of 26 weeks after birth. The Equality Act 2010 protections also cover someone who has had a miscarriage.*

1. Proposed changes to the Sanctions Policy

We are now going to ask you for your views on the proposals contained in the consultation document. The changes we propose are to:

1. **Reflect recent case law**– this ensures that panels have a clearer understanding of the guidance related to suspension orders and their application.
2. **Update guidance on interim orders** – this improves transparency and clarity on how panels should consider interim orders that may have been in place prior to a substantive hearing.
3. **Clarify our guidance on ‘apology’** – this offers more detailed guidance to panels on how to assess apologies made by registrants when things go wrong.
4. **Clarify the ‘strike off’ section** – this clarifies that some conduct is so serious it is incompatible with continued registration.
5. **Add content on ‘assessing seriousness and culpability’**– this enhances transparency and accountability by clearly setting out the aggravating and mitigating factors panels should consider, to help support consistent and proportionate decision-making.
6. **Expand guidance on discrimination**– this clarifies that all forms of discrimination are unacceptable and provides guidance for the factors panels should take into account when addressing this.
7. **Expand guidance on dishonesty**– this makes it easier to assess how dishonest actions may affect trust or cause harm, leading to more informed and consistent decisions in serious cases.
8. **Add sexually motivated misconduct**– this provides additional guidance to ensure panels not only consider sexual misconduct but also assess the registrant’s state of mind and intent in FTP cases, where conduct may have been sexually motivated.
9. **Introduce a new section on ‘professional boundaries’**– this ensures concerns about maintaining professional relationships are addressed appropriately.
10. **Make structural and editorial changes**– this ensures the guidance is clear and easy to read in order to support consistent, proportionate, and well-reasoned decision-making by panels.

**It may be helpful to have the consultation document on hand to help you check detail of the proposals.**

1. Consultation questions
2. To what extent do you agree or disagree with the proposed changes on suspension orders?

[ ]  Strongly agree

[ ]  Agree

[ ]  Neither agree nor disagree

[ ]  Strongly disagree

[ ]  Don’t know

Please provide reasons for your answer:

Click or tap here to enter text.

1. To what extent do you agree or disagree with the proposed changes on interim orders?

[ ]  Strongly agree

[ ]  Agree

[ ]  Neither agree nor disagree

[ ]  Strongly disagree

[ ]  Don’t know

Please provide reasons for your answer:

Click or tap here to enter text.

1. To what extent do you agree or disagree with the proposed changes on apologies?

[ ]  Strongly agree

[ ]  Agree

[ ]  Neither agree nor disagree

[ ]  Strongly disagree

[ ]  Don’t know

Please provide reasons for your answer:

Click or tap here to enter text.

1. To what extent do you agree or disagree with the proposed changes on strike-off where concerns are so serious, they are incompatible with continued registration?

[ ]  Strongly agree

[ ]  Agree

[ ]  Neither agree nor disagree

[ ]  Strongly disagree

[ ]  Don’t know

Please provide reasons for your answer:

Click or tap here to enter text.

1. To what extent do you agree or disagree with the proposed changes on assessing seriousness and culpability?

[ ]  Strongly agree

[ ]  Agree

[ ]  Neither agree nor disagree

[ ]  Strongly disagree

[ ]  Don’t know

Please provide reasons for your answer:

Click or tap here to enter text.

1. To what extent do you agree or disagree with the proposed changes on concerns about discrimination?

[ ]  Strongly agree

[ ]  Agree

[ ]  Neither agree nor disagree

[ ]  Strongly disagree

[ ]  Don’t know

Please provide reasons for your answer:

Click or tap here to enter text.

1. To what extent do you agree or disagree with the proposed changes on dishonesty?

[ ]  Strongly agree

[ ]  Agree

[ ]  Neither agree nor disagree

[ ]  Strongly disagree

[ ]  Don’t know

Please provide reasons for your answer:

Click or tap here to enter text.

1. To what extent do you agree or disagree with the proposed changes on sexually motivated misconduct?

[ ]  Strongly agree

[ ]  Agree

[ ]  Neither agree nor disagree

[ ]  Strongly disagree

[ ]  Don’t know

Please provide reasons for your answer:

Click or tap here to enter text.

1. To what extent do you agree or disagree with the proposed changes on professional boundaries?

[ ]  Strongly agree

[ ]  Agree

[ ]  Neither agree nor disagree

[ ]  Strongly disagree

[ ]  Don’t know

Please provide reasons for your answer:

Click or tap here to enter text.

1. To what extent do you agree or disagree that the structural and editorial improvements are clear?

[ ]  Strongly agree

[ ]  Agree

[ ]  Neither agree nor disagree

[ ]  Strongly disagree

[ ]  Don’t know

Please provide reasons for your answer:

Click or tap here to enter text.

1. To what extent do you agree or disagree with the proposed changes to our sanctions policy in general?

[ ]  Strongly agree

[ ]  Agree

[ ]  Neither agree nor disagree

[ ]  Strongly disagree

[ ]  Don’t know

Please provide reasons for your answer including your views on the substance of the changes.

Click or tap here to enter text.

1. Are there any further changes we should consider to the Sanctions Policy?

Click or tap here to enter text.

1. Do you think the proposed changes have any positive or negative impacts on groups or individuals who share one or more of the protected characteristics under the Equality Act 2010 and equivalent Northern Ireland legislation? (If so, please provide details).

Click or tap here to enter text.

1. Are there any additional steps we should take to ensure the proposed changes do not unintentionally disadvantage any groups?

Click or tap here to enter text.