

## UK Public Health Register

Fitness to Practise:  
Sanctions policy  
July 2026

# Contents

|                                               |   |
|-----------------------------------------------|---|
| Contents .....                                | 1 |
| Introduction .....                            | 2 |
| Sanctions .....                               | 2 |
| Taking no further action .....                | 2 |
| Imposing a Reprimand .....                    | 3 |
| Imposing a Conditions of Practice order ..... | 3 |
| Imposing a Suspensions order .....            | 4 |
| Erasing the registrant from the register..... | 5 |
| Restoration after erasure .....               | 5 |
| Refusal of restoration .....                  | 6 |
| Restoration with conditions of practice.....  | 6 |
| Grant restoration .....                       | 6 |
| Interim Orders .....                          | 6 |
| After a sanction is imposed .....             | 7 |

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# Introduction

1. This policy has been produced by UKPHR to be used as part of its Fitness to Practise process and is used by Fitness to Practise panel members when deciding to impose a sanction on a registrant.
2. A sanction will be imposed where the panel is satisfied that a registrant's fitness to practise is impaired and it is not suitable to remain on the UKPHR register without any restrictions or conditions.
3. The purpose of sanctions is to protect the public and to maintain confidence in the profession by upholding its standards. Fitness to practise proceedings are not punitive; their purpose is not to punish the registrant, but to facilitate their return to safe and effective practise where appropriate. Where a panel determines that a registrant's fitness to practise is impaired, it must impose a sanction that ensures the necessary level of public protection and is proportionate to the level of risk identified.
4. In determining an appropriate sanction, a Fitness to Practise panel must act proportionately, balancing the interests of the registrant with those of the public. The panel should consider all available sanctions, beginning with the least restrictive option. Any limitation imposed on a registrant's ability to practise should go no further than necessary to serve the public interest, including the protection of the public.
5. UKPHR does not have the power to directly suspend or dismiss an individual from employment, and it is up to the employer to decide how best to act on regulatory outcomes following a Fitness to Practise Panel decision. UKPHR's sanctions will only relate to registration status and employers are responsible for employment decisions. UKPHR will routinely inform the employer following a regulatory outcome and the employer will be responsible for applying their own policies on gross misconduct.

# Sanctions

6. Sanctions imposed by the panel may include:
  - Taking no further action
  - Issuing a reprimand
  - Imposing a conditions of practice order
  - Imposing a suspension order
  - Erasing the registrant from the register
  - Interim order

## **Taking no further action**

7. It is unusual for a panel to make a finding that there are concerns about the registrant's current ability to practise safely and effectively without taking further action.
8. If a Fitness to Practise panel decides that taking no action to be the appropriate and proportionate outcome, it should provide a clear reasoning to explain this decision

and its conclusion that there is no risk to the public, or to public confidence in the profession, in taking no action.

9. The Fitness to Practise panel may also decide on an outcome where misconduct is found but a registrant's fitness to practise is not currently impaired, and in those circumstances no formal sanction can be imposed. At a hearing, the panel's decision on impairment focuses on the registrant's current ability to practise unrestricted. Misconduct, which is fully remediated poses low risk of repetition and does not require restriction to protect the public or uphold standards. This can therefore lead to an outcome of misconduct without current impairment.

### **Imposing a Reprimand**

10. A reprimand is the least restrictive sanction a panel can apply after deciding that a registrant's fitness to practise is impaired. It does not stop the registrant from practising, but it acts as a formal warning. A reprimand can appear on the register for a set period of between one and five years. During this period, a note will be added to the registrant's entry explaining the concern and, if relevant, suggesting further training or education. The note will stay in place for the length of the order or until the registrant provides evidence that the required actions have been completed.
11. A reprimand may be appropriate for isolated, limited, or minor concerns where the risk of repetition is low and the registrant has shown insight. It can also be used when practice restrictions are unnecessary, but suspension would be disproportionate. In such cases, the panel should clearly explain why a non-restrictive sanction is appropriate.
12. When setting the length of the order, the panel should first consider whether a one-year reprimand is sufficient to protect the public and uphold confidence in the profession. Longer periods should only be used when necessary. The panel's decision must set out the duration, explain why it is proportionate, and give clear reasons.
13. Although a reprimand does not restrict practice, it may be considered if further concerns arise. In doing so, the panel should take into account the time since the reprimand was imposed, its relevance to the new matter, and whether any required actions were completed.

### **Imposing a Conditions of Practice order**

14. A conditions of practice order allows a registrant to continue practicing while subject to specific, proportionate restrictions that address the concerns identified in relation to their fitness to practise. Such an order may require the registrant to undertake certain actions, complete training, or limit aspects of their work.
15. It is generally appropriate where the registrant has insight, the failings identified are capable of remediation, and there are no persistent or fundamental deficiencies preventing improvement. The panel must be confident that realistic, verifiable conditions can be formulated and that the registrant will comply with them.

16. A conditions of practice order is unlikely to be suitable if the registrant has failed to engage with the process or where there are serious or repeated failings, particularly involving dishonesty, abuse of position, discrimination, violence, sexual misconduct, or serious criminal convictions. Exceptionally, conditions may be imposed in such cases only where the misconduct was minor, remediable, out of character, and unlikely to be repeated, and the panel provides robust justification.
17. Conditions commonly relate to areas such as education or training, practice restrictions, supervision, treatment, notification requirements, or personal development. They must be workable, appropriate to mitigate identified risks, and not so onerous as to effectively suspend practice.
18. Before imposing conditions on a registrant not currently practising, panels should consider whether equally effective non-practice-dependent measures can be implemented. Where stringent conditions would in effect prevent practice, panels should consider whether a suspension order is instead appropriate to protect the public and maintain confidence in the profession.
19. Conditions of practice orders can be imposed for up to three years, with panels required to provide clear reasoning for the selected duration. They may also specify a minimum period of up to two years before an application to vary, replace, or revoke the order may be made, where early review would serve little purpose.
20. All conditions will appear on the registrant's entry on the UKPHR register.

### **Imposing a Suspensions order**

21. A suspension order prohibits a registrant from practising their profession for a specified period and represents a serious restriction on their registration.
22. A suspension order is generally appropriate where there are serious concerns that cannot be resolved by a condition of practice order but that do not justify permanent removal from the Register. Such cases typically involve a serious breach of the standards of Good Public Health Practise 2024, performance and ethics, where the registrant has demonstrated insight, the issues are unlikely to be repeated, and there is evidence that the failings can be remedied.
23. The period of suspension must be proportionate and necessary to protect the public and public confidence and may be imposed for up to one year. Short-term suspensions may be appropriate where a staged return to practice is required, such as when the registrant has engaged with the process but is temporarily unable to comply with conditions of practice, or where there is no ongoing risk of harm but a sanction is required to uphold public confidence in the profession.
24. Panels should clearly specify the purpose of the suspension and the expectations placed on the registrant. The suspension will be recorded on the registrant's entry on the UKPHR register and will remain visible for a specified period, typically five years, following the lifting or expiry of the order.

## Erasing the registrant from the register

25. An erasure order permanently removes a registrant's name from the Register and prohibits them from practising their profession. It is the most serious sanction available to a panel and is reserved for cases where the registrant's behaviour or impairment is fundamentally incompatible with continued registration.
26. Erasure is a long-term sanction and may not be imposed for reasons of lack of competence or health unless the registrant has been continuously suspended or subject to a conditions of practice order for at least two years at the time of the decision, excluding interim orders.
27. This sanction is appropriate only in the most serious cases involving deliberate, reckless, or persistent acts such as dishonesty, failure to raise concerns, abuse of professional position, discrimination, sexual misconduct, sexual abuse of children or possession of indecent images, serious criminal convictions, or violence. It will also be appropriate where the registrant shows no insight, fails to address deficiencies after sustained opportunity to do so, repeats misconduct, or is unwilling to resolve the concerns raised.
28. An erasure order should be imposed only where no lesser sanction would adequately protect the public or maintain confidence in the profession and regulatory process.
29. Panels must provide clear, detailed reasons for imposing this outcome, demonstrating why removal is necessary and proportionate. A note of the erasure order will remain on the registrant's UKPHR register entry for a period of five years since the order came into effect. After this period, this note is removed from the UKPHR register, although internal records are retained and the erasure continues to have regulatory effect unless and until restoration is granted.

## Restoration after erasure

30. If a registrant wishes to restore their registration once the five-year period has passed, they will need to submit an application to UKPHR providing reasons for applying for restoration as well as providing evidence of insight, remediation and current competence. A complex case panel will then be formed to consider the application, which will refer to the original facts and decision as well as relevant references. The panel advise the Registrar on making a decision on whether to restore the registrant's registration and whether restoration will maintain public protection and confidence in the profession. The panel and the Registrar will also consider whether the registrant has taken the necessary steps to keep their knowledge and skills up to date and their conduct since the erasure.
31. The Registrar will assign one of three outcomes:
  - Refusal of restoration
  - Restoration with conditions of practice
  - Grant restoration

## **Refusal of restoration**

32. If the Registrar refuses restoration and is not satisfied that the registrant is fit to practise, the registrant must wait at least 12 months before applying again for restoration.
33. If the registrant is refused restoration again, the Registrar can suspend further applications for a specified time period or indefinitely.

## **Restoration with conditions of practice**

34. If the Registrar agrees to grant restoration with conditions of practice, the registrant will be required to complete relevant education and training in order for UKPHR to restore their registration. This is to ensure that the registrant is competent and fit to practise.
35. Conditions of practice orders can be imposed for up to three years, with panels required to provide clear reasoning for the selected duration.

## **Grant restoration**

36. The Registrar will determine that a registrant is now a fit and proper person to be restored to the register and that restoration would not undermine public protection, public confidence in the profession or proper professional standards.
37. Where restoration is granted, UKPHR will restore the registrant's name to the register as soon as reasonably practicable and notify the registrant in writing.

## **Interim Orders**

38. UKPHR has the power to consider whether it is necessary for the protection of the public or in the public interest, to impose an interim order to be applied whilst a registrant is waiting to be called to a Fitness to Practise Panel.
39. Interim orders can only be imposed if there is determined to be an immediate, genuine and continuing risk to the public, colleagues, the profession, or UKPHR, if an interim order is not made.
40. The purpose of an interim order is a temporary measure to protect the public interest, including the protection of the public, whilst there are ongoing concerns about a registrant's fitness to practise which have not yet been resolved.
41. This will recommend restrictions upon the registrant's practice and will usually be applied until the Fitness to Practise Panel comes to a final decision in relation to an allegation, or it is revoked.
42. Further information on UKPHR's Interim Orders policy can be found [here](#).

## After a sanction is imposed

43. Following a Fitness to Practise Panel hearing, if a Panel agrees that a registrant's fitness to practise is impaired, the Registrar must ensure that notice of the Panel's decision is sent to the registrant and any other relevant people, including the complainant (if any) as soon as reasonably possible.
44. Any sanction decided by the Fitness to Practise Panel will take effect 20 working days after the date of the decision, unless the Panel specifies a different start date.
45. The Registrar must ensure that a record of the hearing is made and reported to UKPHR. UKPHR may publish this record but will not include any parts of the hearing that were held in private.
46. The Registrar must ensure that the outcome of the hearing is recorded in the public register.
47. The Registrar must also decide whether, and what, information from the hearing should be shared with other regulators, in line with UKPHR's public protection policies.
48. The Fitness to Practise Panel must ensure that the registrant concerned fully understands any sanction imposed including the reasons for the sanction and implications.