



Code of Conduct Policy

The Code of Conduct Standards of the Faculty of Occupational Medicine (FOM) apply to all FOM Fellows, Honorary Fellows and members in all categories.

They are especially relevant when Fellows and members (in all categories) and other healthcare professionals represent the FOM, work on the FOM's behalf, or attend a FOM event (business or social, in any location).

The Code of Conduct Standards relate to all forms of communication including written, verbal, non-verbal, electronic and social media, particularly in the above circumstances or if there are potential implications for the FOM's reputation.

Fellows and members (in all categories) and other healthcare professionals have a collective responsibility to maintain these standards. They should be aware that if they fail to meet them, after full ascertainment of the circumstances, steps may be taken to address their behaviour and appropriate sanctions applied.

FOM's Code of Conduct Standards

1. Treat others with respect and consideration.
2. Recognise and value diversity and individual differences.
3. Behave with integrity, honesty, kindness and patience.
4. Be a role model for professional behaviours.
5. Undertake our work in good conscience and to the best of our ability.
6. Foster collaborative and supportive working with others.
7. Promote trust and a just culture.
8. Hold ourselves and others accountable for professional and personal behaviours.
9. Take responsibility for the stewardship of our position of authority, mindful of our impact on others.
10. Respect the FOM's standards and rules and be a guardian of its reputation.
11. Not to conduct themselves in such a way that they could bring the Faculty into disrepute.

FOM's Procedure for the Investigation of Complaints

The FOM aims to provide a clear, fair and transparent process in which complaints regarding the conduct of members (in all categories), Fellows and Honorary Fellows are assessed against FOM's Code of Conduct Standards.

The office of the Registrar holds responsibility for maintaining the records of fellows and members of all categories who are admitted to the FOM, and is the first point of contact for 'matters of concern' raised about the membership. Matters of concern should be sent to registrar@fom.ac.uk.

FOM's Board approves the procedure for investigating 'matters of concern', which is summarised below. The Registrar has a variety of powers to deal with, or delegate to review, 'matters of concern'. Please see the conduct process flowchart – Appendix 1.

1. On a flag from the GMC or other source, a review process will commence.
2. At the outset of this review process, the individual will be contacted and advised of the complaint raised against them, and signposted to sources of support.
3. The FOM reviews the outcomes of all cases considered by the GMC and the Medical Practitioners Tribunal Service (MPTS). Substantive decisions on erasure and suspension by the Medical Practitioners Tribunal Hearing result in automatic disqualification from FOM membership/ fellowship. In the event of the GMC subsequently restoring registration, the FOM would be able to consider re-entry to membership or re-election to fellowship.
4. Where a member is made subject to conditions/undertakings/warnings or to an interim order (conditions or suspension) by the GMC/MPTS, the FOM reserves the right to ask for a confidential declaration as to standing to be made by the member. Failure to make such a declaration may result in a removal of membership rights (in cases of interim orders, pending a final adjudication from the GMC/ MPTS).
5. In exceptional (egregious) circumstances, interim suspension orders by the GMC can result in immediate removal of membership (in any category) or fellowship via 'emergency measures'. In these cases, if subsequently no case is found against the appellant by the GMC, appeal for restitution of FOM membership could be immediate.
6. If the original complaint is not from a GMC source and is adjudicated using the FOM Code of Conduct, the Registrar may, if felt necessary, disclose to the GMC and/or the members' Responsible Officer any information relating to a disciplinary offence (or alleged disciplinary offence) and any proceedings taken or penalty imposed by the FOM in connection with it.
7. For complaints initiated from other sources, a local/informal resolution of a complaint may be possible: for example, for one-off unexpected poor conduct where a genuine apology has been offered and accepted. This may involve the Registrar referring cases to appropriate FOM officers to manage within their directorate or team.
8. The Registrar will inform the member of any complaint received and invite a written statement by way of response. On occasion, the registrar may choose to interview the member to aid fact finding.
9. At the Registrar's discretion, and usually after consultation with another senior officer, no action after initial review might be thought appropriate.

10. The Registrar will assess and case manage any investigation. An investigation file will be produced and kept as a digital record. The decision to escalate for formal collegiate review will be made by the Registrar alone or after consultation with others.
11. Where local resolution is not possible and, or where conduct is sufficiently poor or inappropriate and, or where there is a pattern of such conduct, this should be escalated by the Registrar for case investigation by FOM's Conduct Investigation Panel.
12. Should the matter be considered serious enough for escalation, the Registrar will inform the member of the relevant procedure.
13. The Conduct Investigation Panel is convened by FOM's Board and will include at least one independent person. The main reference document for this panel will be the FOM Code of Conduct Standards. The panel may also be provided with legal advice. There is separation between the Registrar who initiates and manages the process, and the Conduct Investigation Panel that conducts the review and decides on sanctions.

Sanctions include:

- a. Dismissal of the case
 - b. Reprimand of the member or Fellow by means of an oral or written warning (by the Registrar on the Conduct Investigation Panel's recommendation).
 - c. Temporary suspension or permanent removal of the member's particular subscription status. Such recommendations must be endorsed by FOM's Board, acting on behalf of the membership as a whole.
 - d. In any case where specific FOM facilities or resources have been misused, by recommending that the member makes good any loss.
 - e. Although unusual, under specific circumstances as judged by the Conduct Investigation Panel and/ or Registrar, members and Fellows might be barred from holding office or undertaking duties for the FOM, but might be permitted to continue with their membership.
14. A register of conflicts of interest is maintained for those undertaking FOM conduct investigation work as part of their FOM roles and held by the office of the Registrar.
 15. Members should receive the decision of the FOM in writing both digitally and to their registered address from the office of the Registrar.
 16. All members undergoing investigation should have a standardised letter sent, signposting them to support.
 17. All members shall have the right to request an appeal (bar those who have been erased or suspended by the GMC) to be submitted within 2 weeks of a disciplinary decision by the FOM. A standard appeal request form will be included with decisions, inviting the appellant to provide new evidence and their views on why the disciplinary decision was incorrect.

18. Where a concern has been raised regarding a senior officer who holds a role in the conduct and disciplinary procedure, they will be substituted in that role.
19. Where the President is subject to investigation, their role in the procedure will be allocated to one of the remaining senior officers of the FOM (not cited in the complaint).
20. In the event of the Registrar having a conflict of interest, matters of concern should be sent to the President in the first instance at president@fom.ac.uk. A Trustee without conflict of interest will be appointed by the Board to assess the complaint and, if necessary, to escalate the matter to the Conduct Investigation Panel.

Appendix 1: Conduct process flowchart

