



Faculty of
Pharmaceutical
Medicine

*Advancing the science and practice of pharmaceutical medicine
for the benefit of the public*

FPM Complaints Policy Members and Fellows

Document	Version date	Owned by / Approved by	Summary of changes and rationale
Original Policy	January 2025	Board / Board	Not applicable (N/A)

Introduction

This policy sets out the process for handling Complaints made regarding the conduct of FPM members and Fellows, including volunteers and Trustees. It will be reviewed annually and published on the Faculty of Pharmaceutical Medicine's website.

Scope

There are separate existing policies for handling Complaints regarding the conduct of employees. Therefore, this policy should not be viewed as being appropriate for Complaints about that group. For information on how to raise a Complaint about employees, please refer to the separate Policy document on the FPM website.

Volunteers are also advised to read FPM's Code of Conduct for Volunteers, which can be found on the FPM website.

For the purposes of this policy, a Complaint is defined as "an expression or statement of dissatisfaction, however made, which comes to the attention of the Chief Executive or Registrar indicating that a member, by their actions taken or not taken, may have become liable to disciplinary action and/or may be acting in contravention of FPM's Code of Practice."

Any person, whether a member of FPM or not, may make a Complaint against a member. So too, under certain circumstances, may the Chief Executive on behalf of FPM. Complaints may relate to others (e.g. subordinates or subcontractors) for whose work the member was directly responsible at the time of events that are the subject of the Complaint.

A Complaint will not normally be considered if it is notified to FPM more than 18 months after the incident(s) took place that are the subject of it. In the event of a query or disagreement about this deadline, the Chief Executive shall decide whether the Complaint may proceed.

The Complaints procedure is governed by the rules of natural justice. It will be managed at all times to ensure that the Respondent has a fair and proper opportunity to answer the Complaint. FPM will retain all records relating to the Complaint for seven years from the date on which it was received.

The Complaint handling process: a summary

The Complaint process comprises the following elements:

- Making a Complaint
- First and second stage response
- Conciliation
- Investigation (by Panel)
- Appeal (by Panel) (upon request)
- Penalties (where appropriate)

All Complaints should be sent in the first instance to fpm@fpm.org.uk. The Chief Executive will investigate and send a response to the Complainant, usually within 10 working days. If the issue necessitates a lengthier investigation, a response may take longer.

- **If the Complaint is upheld**, the Chief Executive will set out the actions that will be taken. This could be the requested resolution, alternative remedial action, an apology or a decision to refer the matter to the Officers or Board of Trustees as appropriate.
- **If the Complaint is partially upheld**, the Chief Executive will set out which issues are and are not accepted and what action will be taken. This could be the requested resolution, alternative remedial action, an apology or decision to refer to the Officers or Board of Trustees as appropriate.
- **If the Complaint is not upheld**, the Complainant will be informed. If they are not satisfied, the issue can be referred to the Officers or Board of Trustees as appropriate.

If the Chief Executive believes a Complaint to be sufficiently serious, or the Complainant is not satisfied with the response, the issue will be referred to the Officers to consider in detail within 10 working days. If the Complaint relates to a Board member or Officer, they should take no part in considering the issue.

If the Officers decide that the Complaint needs to be investigated further, the Registrar will convene a Trustee Subgroup to oversee the process, and engage HR Services. The Trustee Subgroup will comprise the Chief Executive, the Registrar or another Officer and a Lay Trustee.

The first step in resolving a Complaint, if the Complainant and the Respondent agree to it, is a process of conciliation, mediation or arbitration ('Conciliation'). Conciliation is an informal process managed at the discretion of the Chair of the Conciliation Panel and of any Conciliators whom FPM appoints. It is a confidential process - no records will be kept afterwards, and no details will be forwarded to the Investigation Panel or Appeal Panel.

The Chief Executive, together with the Trustee Subgroup, will initiate the conciliation process, either by appointment of an External Conciliator through HR Services and/or by setting up a Conciliation Panel. The process should conclude no later than three months after the Panel was appointed.

If a Complaint is not resolved by Conciliation, it will pass to an Investigation Panel to consider and reach a decision. If the Respondent wishes to appeal against the decision of the Investigation Panel, they have up to 14 days to appeal, stating the grounds on which that appeal is based. If the Chair of the Appeal Panel considers the grounds for appeal are valid, the Complaint will be referred to the Appeal Panel for consideration and a final decision.

If the Complaint becomes the subject of a hearing of an Investigation and/or Appeal Panel, the final recommendation of the Panel will be decided in private, notified in writing to both the Complainant and the Respondent, and reported to the FPM Board.

Full details of how the Complaint handling process works, including the work of the Conciliation, Investigation and Appeal Panels can be found in the document, "FPM Regulations governing the handling of complaints".

Penalties

If Complaint against a Member is upheld, the Investigation Panel or the Appeal Panel may decide that any or all of the following penalties apply:

- the Member be reprimanded, or their membership suspended for up to two years, or terminated altogether
- the Member be prohibited from sitting on an FPM Committee (inc. the Board) or working group for up to three years
- the Member be prohibited from representing FPM in any formal capacity in any external forum or committee
- a report be sent to the Member's Responsible Officer

or other penalties as the Panel sees fit to apply.

If the Respondent breaches any of the penalties listed above, they may be subject to a further Complaint and possible action.

Unless a Panel decides otherwise, all costs and expenses incurred by FPM in connection with the handling of the Complaint will be borne by FPM.

FPM will maintain a register of all Complaints received and the decisions on them.

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