



**UKCP's Complaints and Conduct Process
Complaint Hearing**

**28-29 September 2023
Online**

Name of Registrant:	Manu Bazzano
Heard by:	Adjudication Panel
Panel Members:	Catherine Hinton (Lay Chair) Ian Roberts (UTC) Charmian Beer (CSRP)
Legal Assessor:	Nigel Mitchell, Independent Legal Assessors
Panel Secretary:	Kat Zhou
UKCP Presenting Officer:	Tom Stevens, Doughty Street Chambers
Registrant:	Alecsandra Manning-Rees, 5 St Andrew's Hill
Charges found proved:	1, 2, 3a, 3b, 4a
Charges found not proved:	N/A
Panel decision:	Misconduct found. Impairment not found.
Sanction:	N/A

Detail of allegations

That being a UKCP registered psychotherapist since 2011, you Manu Bazzano (the Registrant):

1. On 29 April 2021, signed a 'Consensual Disposal Agreement' ('CDA') with the 'British Association of Counselling and Psychotherapy' ('BACP'), in which you admitted to taking an attendee (A) on a course at which you were teaching, for a drink on 14 February 2020, during which you kissed her without her consent.
2. On 30 November 2021, had your BACP membership withdrawn due to a BACP sanction panel concluding you had failed to fully comply with the terms of the sanctions imposed following your signing of the 'CDA' referred to in allegation 1.
3. The conduct captured by your admission, referred to in allegation 1., and/or your conduct captured in allegation 2 was:
 - a. Inappropriate;
 - b. Unprofessional.
4. The conduct captured by your admission, referred to in allegation 1., and/or your conduct captured in allegation 2 is in breach of the UK Council Code of Ethics and Professional Practice 2019 (Code). In particular:
 - a. You failed to act in a way which upholds the profession's reputation and promotes public confidence in the profession and its members, including outside of your professional life as a UKCP practitioner, thereby breaching clause 32 of the Code.

For the reasons set out above, your fitness to practise is impaired by reason of misconduct.

Documents

1. The Panel had placed before it the following documents:
 - a. An agreed bundle amounting to 143 pages, hereafter referred to as C1.
 - b. A letter from the Registrant's hospital dated 18 September 2023 amounting to 3 pages, herein referred to as R1.

Hearing

2. The complaint was heard under the UKCP Complaints and Conduct Process 2022, and the Panel considered the alleged breaches of the UKCP Code of Ethics and Professional Conduct 2019 (the Code).

Background

1. On 14th February 2020, the Registrant kissed an attendee 'A' or 'the Complainant' without her consent following a psychotherapy skills training course hosted by him and Mr JD.
2. A complaint was made by 'A' to UKCP on 11 May 2020 and also BACP on 12 May 2020. On 29 April 2023 the BACP and the Registrant agreed to a consensual disposal agreement. The sanction was that the Registrant was to provide BACP with a copy of a letter of apology to the Complainant that BACP would forward to the Complainant, and additionally provide BACP with a written reflection statement.
3. On 6 July 2021, the BACP Sanction Panel considered the reflective statement dated 10 May 2021 and letter of apology to the Complainant of the same date provided by the Registrant. On that occasion, the Sanction Panel was satisfied with the apology letter however found that in the reflection statement, the Registrant failed to address the matters of concern that the sanction required. The Sanction Panel extended the period for the Registrant to make submissions and required him to submit a further reflective statement with greater detail and depth of reflection.
4. On 30 September 2021, the BACP Sanction Panel considered the Registrant's original submissions and response to the request for further information. The Sanction Panel found that the Registrant's further submission remained inadequate in that it failed to adequately satisfy the clear and unambiguous requirements of the sanction. The Sanction Panel decided that it would extend the period once more for the Registrant to make submissions. However, the Registrant was notified that if the Registrant's submissions remain inadequate, it may consider withdrawal or suspension of the Registrant's membership.
5. On 30 November 2021, the BACP Sanctions Panel reconvened to consider whether the Registrant had complied with the sanction agreed in the consensual disposal agreement. The Panel found that the Registrant had failed again to adequately remediate his failings and therefore continued to pose a risk to trainees and the reputation of the counselling and psychotherapy professions. The Sanction Panel therefore concluded that the Registrant's BACP membership be withdrawn.

Decision on Facts

3. The Panel considered all of the documentary evidence before it and heard oral submissions from Mr Stevens on behalf of UKCP and Ms Manning-Rees on behalf of the Registrant. Ms Manning-Rees submitted that all the allegations were admitted by the Registrant.
4. The Panel heard and accepted the advice of the Legal Assessor.

5. On balance, having fully considered the evidence and submissions, the Panel made the following findings:

Allegation 1

On 29 April 2021, signed a 'Consensual Disposal Agreement' ('CDA') with the 'British Association of Counselling and Psychotherapy' ('BACP'), in which you admitted to taking an attendee (A) on a course at which you were teaching, for a drink on 14 February 2020, during which you kissed her without her consent.

Found proved by way of admission

Allegation 2

On 30 November 2021, had your BACP membership withdrawn due to a BACP sanction panel concluding you had failed to fully comply with the terms of the sanctions imposed following your signing of the 'CDA' referred to in allegation 1.

Found proved by way of admission

Allegation 3

The conduct captured by your admission, referred to in allegation 1., and/or your conduct captured in allegation 2 was:

- a. Inappropriate;

Found proved by way of admission

- b. Unprofessional.

Found proved by way of admission

Allegation 4

The conduct captured by your admission, referred to in allegation 1., and/or your conduct captured in allegation 2 is in breach of the UK Council Code of Ethics and Professional Practice 2019 (Code). In particular:

- a. You failed to act in a way which upholds the profession's reputation and promotes public confidence in the profession and its members, including outside of your professional life as a UKCP practitioner, thereby breaching clause 32 of the Code.

Found proved by way of admission

Decision on Misconduct

6. The Panel then went on to consider the question of misconduct. This determination should be read in accordance with the Panel's previous determinations.
7. Having heard submission from both parties, and taken advice from the Legal Assessor, the Panel decided to consider the question of misconduct before moving on to consider impairment. Ms Manning-Rees has informed the Panel that notwithstanding that it is still a matter for the Panel misconduct is admitted in this case. She further informed the panel that the question of impairment is neither admitted nor denied and she will address the panel on this at the appropriate time.
8. In accordance with rule 7.23 of UKCP's Complaints and Conduct Process, the Panel went on to consider the question of misconduct. The Panel heard further submissions from Mr Stevens on behalf of UKCP and Ms Manning-Rees on behalf of the Registrant.
9. Mr Stevens on behalf of UKCP invited the Panel to conclude that the facts found proved, including the breach of the Code, amounted to misconduct. He submitted that the Registrant had departed from the standards reasonably expected of registrants and that the departure was serious. It constitutes a failing on the part of the Registrant to adhere to the standards expected of him. The Registrant accepts that his conduct failed to uphold standards and undermined public trust and confidence in the profession. Within the Consensual Disposal Agreement (CDA) the Registrant admitted that he kissed **A** without consent. UKCP acknowledge that their case is not that he breached professional boundary as the Complainant was not a client. The fact of the kiss itself is a serious matter. It represents physical and emotional violation. This he said, is further aggravated by the context of the power imbalance that existed between the two (the Registrant being a trainer, and the Complainant a trainee in his course). Further, the Registrant failed to comply with the terms of the sanctions imposed within the CDA and the subsequent sanctions imposed following this failure. Despite being given multiple opportunities to address the concerns, this he failed to do. The BACP noted that his reflections focused on himself rather than on the points of concern that he was required to address.
10. Ms Manning-Rees told the panel that the Registrant accepted that his behaviour by his admissions amounts to misconduct.
11. The Panel accepted the advice of the Legal Assessor as to the approach it should adopt in considering the question of misconduct. The Panel recognised that the question of misconduct is a matter of independent judgement and is not a matter of proof for the parties.
12. In addressing whether the facts proved amounted to misconduct, the Panel had regards to the words of Lord Clyde in the case of *Roylance v. General Medical Council*. He stated:

“Misconduct is a word of general effect, involving some act or omission which falls short of what would be proper in the circumstances. The standard of propriety may often be found by reference to the rules and standards ordinarily required by...a practitioner in the particular circumstances.”

13. The Panel had regard to the judgement of Collins J in the case of *Nandi v General Medical Council* (2004) EWHC 2317 (Admin) in which he said: *“The adjective “Serious” must be given its proper weight, and in other contexts, there has been reference to conduct which would be regarded as deplorable by fellow practitioners. It is, of course, possible for negligent conduct to amount to serious professional misconduct but the negligence must be to a high degree.”*
14. In light of the above, the Panel noted that the Registrant was **A**'s trainer, which in itself creates a power imbalance. To kiss her on the lips without her consent demonstrated a lack of awareness of his own power in relation to the power imbalances inherent in a trainer/trainee relationship. His behaviour can only be regarded as serious misconduct and would be seen as deplorable by fellow practitioners. The Registrant acknowledges this. This was behaviour that demonstrably fell short of that to be expected of a practitioner in the Registrant's position. It was a breach of professional standards and therefore brings the profession into disrepute and undermines public confidence in the profession. Following the Registrant's signing of the CDA, he was given opportunities to comply with the sanction imposed. On a number of occasions, notwithstanding being told what was required of him, he failed to so comply. His responses to the BACP concentrated more on himself than the effect of his conduct on **A** and the profession. In all the circumstances, the panel determined that allegations 1-4 demonstrate serious misconduct.

Submissions on Impairment

The Registrant

15. Ms Manning-Rees called the Registrant to give evidence. He was sworn in, adopted his statement as correct and was asked some supplementary questions. The legal assessor clarified to the Registrant that he is entitled to privacy of health matters and any evidence relating to that would be in private.
16. Ms Manning-Rees asked the Registrant what it is about psychotherapy that he enjoyed. The Registrant said his initial studies and training was about philosophy. Specifically continental philosophy - that is close to everyday living, deals with the way we understand ourselves in the world and with others. He felt there was something missing and his aspiration was that maybe he would find answers in psychotherapy, so he started studying it. It would be interesting to go into training for self-development, and then perhaps consider it as a profession. It became his social life in terms of colleagues being friends.

17. Ms Manning-Rees asked the Registrant why he believes that the kiss was a breach of his ethics. He said regardless of the facts that a friendship of sort had been established over the 3-4 months of knowing **A**, the moment she became a trainee, he was her tutor and she was his pupil. There was thereby a power imbalance. He believed that she was interested in him and his work. He misread the inbuilt power imbalance which was in addition to the age gap. It was in his understanding at the time, that this was a potential friendship. It is undeniable that the power imbalance that he had with **A** means that there was an obvious mistake/transgression on his part.
18. Ms Manning-Rees asked about what he had put in place in his life following the incident. The first port of call was with his supervisor. Supervision overlapped between clinical work and this particular issue with **A**. Discussing how it could have happened and how he could have avoided it. His supervisor had been a great assistance in navigating the maze that was the interaction with BACP. It became clear that he had to support himself in this phase in his life by seeing a therapist – which he eventually did. This started earlier this year in weekly personal therapy sessions and has made a tremendous difference. He is very relieved that he had that support and that helped him understand the more personal aspect of the situation.
19. Ms Manning-Rees then asked him about the BACP's observations on his reflections which they believed concentrated more on himself rather than the effect of his conduct upon **A** and the profession. The Registrant said that when he talked about himself, he thought that that was what they wanted, by way of self-scrutiny. It was not meant to be narcissistic, but a way of exploring "how on earth could this happen in my professional life?". In hindsight, he now says that what was missing was the external element i.e., the impact that his actions had on the Complainant and the ripple effect that it would therefore have had on the profession. His focus recently has been more on the impact of his actions to the Complainant, the profession, and the public.
20. Ms Manning-Rees asked him, if he had the opportunity, what would he say to the Complainant now? In addition to what he has already said to her in his apology letter, he very sincerely hoped that this gross misjudgement hasn't impacted on her love of learning, her experience, and her sincerity in pursuing this difficult profession.
21. When asked about future risk, he said that "I have thoroughly and painfully learned my lesson. How could I (have behaved in that way)?". When asked what he has put in place since this incident, he said that he no longer accepts female clients as trainees. He goes through a more lengthy and thorough interviewing process. For example, if someone writes to him saying that they admire his writing and want to work together, he would say no. He is reluctant to accept new clients because he doesn't want to work more than his current capacity. As to his online courses, all communication is via the course convenor. He said that he wants to protect the profession and protect himself, and that he doesn't ever want to be in a situation where he will put himself in the same position again.

22. When asked why remaining a member of the UKCP is important to him, the Registrant said that the entire procedure with BACP was via email and not in person. The withdrawal of membership was disappointing. [REDACTED] On the other hand, the UKCP has listened to him as evidenced in today's proceedings. That already speaks volumes to him. Maintaining membership with the UKCP is very important to him. He is grateful for everyone's time and for doing it in this format which he seems is the right way. He wants to continue doing work within a professional body that he respects and values.
23. When asked what he hopes to achieve as a therapist/practitioner in the future, he said that his future is uncertain at this stage. But he has a lot to express, there is so much material that he started that he wants to share. There are new developments within the profession that he is excited to experience. He wants to edit books and invite people who haven't written before and develop ideas. He wants to be able to facilitate that. He wants to be able to articulate his ideas well enough so that someone else can pick up the ideas and continue on. That's what keeps him alive, and he wants to continue until he physically cannot anymore. He said, "It is a very strange but wonderful profession."
24. Mr Stevens then asked some questions in cross-examination. Mr Stevens firstly asked the Registrant, was there anything wrong with the nonconsensual kiss? The Registrant accepted that it was nonconsensual and "absolutely wrong."
25. Mr Stevens brought his attention to the use of the word 'tentatively' within the Registrant's response to the complaint (dated 8 March 2022), which suggests a failure to grasp the full consequences of his actions. The Registrant said that "she was given a nonconsensual kiss... I was wrong... it had a considerable impact on her... I am still profoundly sorry".
26. Mr Stevens asked the Registrant if he remained of the view that the withdrawal of his membership by the BACP was the wrong decision. The Registrant said that it is not for him to say if it was right or wrong, but that it was the harshest decision that any professional body could make.
27. Mr Stevens asked if the Registrant still stands by his view that the BACP's decision "represents an effort to be seen as taking the 'right side' in the current cultural and gender wars and that their decision to punish me comes out of fear." The Registrant said not entirely – A's statement had many elements that weren't true and concocted in a way to portray him in the harshest possible light.
28. Mr Stevens then asked the Registrant to clarify what his views are on A now, and whether he stands by what he had said in his response (particularly, that he accused her of malevolence and lies). When concluding his reflection, Mr Stevens pointed out to him that he made reference to the "punitive feminist with a lust for vengeance", and asked why did he bring this up and what relevance is it to this case? Does he continue to characterise the Complainant in that way? The Registrant said that he did

not consider **A** as a punitive feminist. He hasn't seen, spoken to, email, or texted her since the day of the incident.

29. Mr Stevens asked the Registrant if he has ever viewed himself as a victim in all of this? The Registrant said not at all. When asked who the victim is in all of this, the Registrant responded by asking how Mr Stevens defines victim. Mr Stevens then rephrased his question and asked the Registrant, does he not think that she is entitled to feel the way that she does (ie. traumatised by the experience)? The Registrant replied that it was the wrong thing to do, and his wrongdoing had a considerable impact on the Complainant. He is still profoundly sorry. Mr Stevens asked him, did she owe you a response? He said no.
30. Mr Stevens asked the Registrant whether he thinks she did the right thing by informing the regulators of his conduct. The Registrant said that she obviously did, however ideally he would have preferred if she "hashed it out" with him first.
31. In terms of his practice, Mr Stevens suggested that by no longer accepting females as trainees, the Registrant was mindful of future risk of similar behaviour. The Registrant said "100% no." He doesn't want the remotest possibility of this situation ever happening again.
32. The Panel then had the opportunity to ask the Registrant questions. When asked how this experience has influenced his understanding of consent, the Registrant said that consent was central.
33. When asked what he had learnt about his own transferences onto people (trainees, the complainant, other therapists), the Registrant said that it is not about him and it is not about the other person. They are in a particular "intricate interaction," a co-created space.
34. The Panel then asked how he could reassure the panel that this would not occur in his clinical work. The Registrant stated that it had never happened before in the clinical work. He is aware of the boundaries when he is in that chair as a therapist. There is an immediate intimacy in the room.

KS

35. Ms Manning-Rees called **KS** to give evidence. He was sworn in, adopted his statement as correct and was asked some supplementary questions.
36. Ms Manning-Rees asked within his statement that he began as a supervisor what does clinical supervision look like? In terms of the Registrant personally, he was asked what this supervision looked like and how it has changed since the incident? **KS** said that the Registrant often shares with him what he will talk about when he gives seminars. They have had a few dedicated supervisions

looking at whether he made mistakes, whether he could have handled things differently, and spent time looking at his private practice.

37. When asked about any changes in the Registrant as a practitioner, **KS** said that the Registrant still works with clients. He was advised by UKCP that if his health didn't permit, then he should limit his practice. The Registrant still brings his cases to supervision. **KS** said that he has had no concerns about the Registrant's practice.

38. Mr Stevens had no questions in cross-examination.

39. The Panel had no questions.

JD

40. Ms Manning-Rees called **JD** to give evidence. He was sworn in, adopted his statement as correct and was asked some supplementary questions.

41. Ms Manning-Rees asked **JD** how frequently he had discussed the case with the Registrant. **JD** said that it has been a fairly regular topic of conversation.

42. Ms Manning-Rees then asked what process the Registrant has been through. **JD** said that the Registrant has spoken to a number of trusted colleagues about what happened and his concerns about it. In terms of his own process, the Registrant has self-reflected about what happened, how he engages with people as a trainer, how he might come across to people, the issues of standards, and vulnerability in those people who have been involved in courses. His thought process has covered a whole range of things during their sessions together. **JD** would sum it all up as "deep self-reflection."

43. When asked did he, **JD** have any concerns about a risk of repetition, he responded "absolutely none". having seen him go through the process, "none whatsoever". They are in the process of the third course that they have organised together, and this is a reflection of how much he trusts the Registrant. He also finds himself going to the Registrant for his own professional advice which also proves this further.

44. Mr Stevens had no questions in cross-examination.

45. The Panel then had the opportunity to ask **JD** questions. The Panel asked about "deep self-reflection" and to elaborate on what he meant. The Registrant has given a lot of thought into how he engages with people, what experiences they may have had in the past and how his relationship with them could impact on those things. There has been a lot of reflection around what it means to be

somebody in a position of power and someone who is well-known, and what this means to the relationship he has with people. The Registrant is now conscious as to how he might come across to people with whom he works.

Submissions

46. The Panel heard further submissions from Mr Stevens on behalf of UKCP and Ms Manning-Rees on behalf of the Registrant with regards to current impairment.
47. Mr Stevens submitted that it was open to the Panel to find current impairment based on public protection grounds.
48. Mr Stevens submitted that there was current impairment based on public interest grounds. To make no finding of impairment was likely to diminish public trust in the profession.
49. Ms Manning-Rees submitted that the Registrant made a serious error and a failing as a professional. She reminded the Panel that he makes no excuse for his behaviour. She reminded the Panel that Registrant had continually sought to comply to the sanctions that BACP required of him and the reflective documents provide evidence of development of insight and a continued commitment to the profession.
50. The BACP thought this complaint could be resolved by a CDA and that the CDA would have addressed the public interest. The Registrant explained in his oral evidence that the focus on himself in his reflections was a sincere attempt to address what he thought the committee wanted from him and he has never backed away from admitting his behaviour was wrong. He has worked extremely hard in supervision and therapy to address those areas where he was lacking in insight. He has approached supervision in an honest way and indeed sought further supervision.
51. The two witnesses called on behalf of the Registrant are relevant to the issue of impairment. They had immediate knowledge of the incident, the Registrant's responses to the incident, and his subsequent "deep self-reflections". Their evidence should satisfy the panel that he has properly reflected.
52. Ms Manning-Rees submitted that there are no public protection grounds and the public interest has been met by the finding of the BACP.
53. The Panel heard and accepted the advice of the Legal Assessor.

Decision on impairment

54. The Panel then went on to consider the question of impairment. This determination should be read in accordance with the Panel's previous decisions in this case.

55. In reaching its decision, the Panel was mindful that the question of impairment is a matter for the Panel's professional judgement. The Panel was required to determine whether the Registrant's fitness to practice is currently impaired. The Panel had to assess the current position looking forward not back, however in order to form a view of the Registrant's fitness to practice today, the Panel will have to take account of the way in which the Registrant has acted or failed to act in the past. The Panel acknowledged that a finding of misconduct does not necessarily mean that there is impairment of fitness to practice.

56. The Panel applied the approach to determine the question of impairment by Dame Janet Smith as set out in the 5th Shipman Enquiry and cited with approval in the case of CHRE v Grant (2011) EWHC 927 (Admin):

"Do our findings of fact in respect of the doctor's misconduct, deficient professional performance, adverse health, conviction, caution or determination show that his/her fitness to practise is impaired in the sense that s/he:

- a. Has in the past acted and/or is liable in the future to act so as to put a patient or patients at unwarranted risk of harm; and/or*
- b. Has in the past brought and/or is liable in the future to bring the medical profession into disrepute; and/or*
- c. Has in the past breached and/or is liable in the future to breach one of the fundamental tenets of the medical profession; and/or*
- d. ...*

57. In considering whether a finding of current impairment on public protection grounds was warranted, the Panel considered whether the Registrant was liable to act in such a way in the future. The Panel had regard to the level of insight shown by the Registrant. The Panel also had regard to the decision in the case of Cohen v GMC (2008) EWHC 581 and considered whether the Registrant's misconduct is easily remedied; has already been remedied; and whether it is likely to be repeated.

58. In considering whether a finding of current impairment on public interest grounds was warranted, the Panel had regard to the wider public interest in the form of maintaining public confidence in the profession and declaring and upholding proper standards. The Panel considered the following part of the judgement in the case of Grant:

"In determining whether a practitioner's fitness to practice is impaired by reason of misconduct, the panel should generally consider not only whether the practitioner constitutes a present risk to members of the public in his or her current role, but also whether the need to uphold proper

professional standards and public confidence in the profession would be undermined if a finding of impairment were not made in the particular circumstances.”

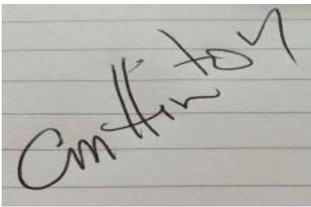
59. Applying the relevant elements of Dame Janet Smith’s test, as set out above, in the Panel’s judgement, the Registrant’s misconduct put NF at unwarranted risk of harm and involved a serious breach of the fundamental tenets of the profession. Further, his conduct will undoubtedly have brought the profession into disrepute. These conclusions concern the past. The question for the Panel is to look to the future and decide whether this misconduct is likely to be repeated.
60. Having considered all the evidence in this case, both written and oral, the Panel determined that the Registrant’s misconduct is remediable, has been remedied, and there is no likelihood of repetition. Since these incidents, the Registrant has fully acknowledged the seriousness of this behaviour and has demonstrated this acknowledgement by “deep self-reflection”, attending training sessions (including those addressing boundary issues), attending courses, purchased webinars... He is remorseful for his actions and has apologised for them many times. Indeed, he told the Panel that he hopes that his behaviour did not disrupt **A**’s career. In addition, he has undertaken a great deal of remedial work. The Panel determined that this remorse is genuine and that there is no risk of repetition.
61. In coming to this conclusion, the Panel was assisted by both the oral and written evidence of the Registrant himself and the oral and written evidence of **JD** and **KS**. These two witnesses are very familiar with this case and have good knowledge of the Registrant. Both unequivocally state that they have no concerns whatsoever about his practice and state that there is no risk of repetition. The Panel also took into account the recent written testimonials of three witnesses, all of whom are experienced psychotherapists, and all of whom are aware of the allegations made against the Registrant. They all state that he is a valued member of the profession, for example “... [he] is not only a safe pair of hands for his clients and supervisees, but that his commitment to serving the best interest of clients, and this profession, are invaluable. I highly, without equivocation, recommend him”, and “... I know him to be an honourable and caring person. I trust his judgment and his ethics, and would not hesitate to refer through to him vulnerable clients who might need to be treated with the upmost care and respect. When I look round at my circle of fellow therapists, Manu is one whose integrity and humanity stand out to me...”.
62. In all the circumstances therefore, the Panel determined that there is no evidence or material to support a finding of impairment on public protection grounds. The Panel then moved on to consider whether there should be a finding of impairment on the ground of public interest. Having determined that there is no risk to the public, the Panel considered whether public confidence in the profession would be undermined if a finding of impairment were not made in the particular circumstances. The panel determined that it would not. The panel bore in mind that the Registrant has been before the BACP and had his membership of that body revoked. The panel determined that in the time since the incident involving **A** and the BACP’s determination, the Registrant has taken meaningful steps

including evolution and development of his reflection and insight. He has taken additional supervision, individual therapy, and continued professional and personal development specific to this issue. Public confidence in this profession will not be undermined in these circumstances. Accordingly, the panel determined that there are no grounds for a finding of impairment on public interest.

Right of Appeal

63. Both the Registrant and UKCP have 28 days from when the written decision is served in which to exercise their right of appeal.

Signed,

A photograph of a handwritten signature in black ink on a piece of lined paper. The signature is written in a cursive style and appears to read 'Catherine Hinton'.

Catherine Hinton, Lay Chair

29 September 2023