



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

**16 & 17 February 2026  
ONLINE**

<b>Name of Registrant:</b>	Lee Laurence (UTC)
<b>Heard by:</b>	Adjudication Panel
<b>Panel Members:</b>	Catherine Hinton (Lay Chair) Claire Barry (UTC) Martin Bhurruth (CPJAC)
<b>Legal Assessor:</b>	Rebecca Tuck KC, Cloisters Chambers
<b>Panel Secretary:</b>	Bethany Rees
<b>UKCP Presenting Officer:</b>	Sophie Walmsley, Guildhall Chambers
<b>Registrant's Representative:</b>	Unrepresented and not present
<b>Charges found proved:</b>	Allegation 1, 2, 3, 4, 5, 6, 7a in relation to (1), (4), (5), and (6), 7b in relation to (1), (4), (5), (6), 7c in relation to (1), (5), and (6), 7d in relation to (1), 8a in relation to (1), (4), (5), (6), 8b in relation to (1), (4), (5), (6), (7), 8c in relation to (1) and (7), 8d in relation to (1) and (7d), 8e in relation to (1) and (7d), 8f in relation to (1) and (7), 8h in relation to (1), 8i in relation to (1), 8j in relation to (1), (4), (5), and (6), 8k in relation to (1), 8l in relation to (1), (4), (5), (6), 8m in relation to (6).
<b>Charges found not proved:</b>	Allegation 7a in relation to (2) and (3), 7b in relation (2) and (3), 7c in relation (2), (3), and (4), 8a in relation to (2), (3), 8b in relation to (2) and (3), 8c in relation to (2), (3), (4), (5), and (6), 8d in relation to (2), (3), (4), (5), (6) (7a), (7b), (7c), 8e in relation to (2), (3), (4), (5), (6), (7a), (7b), (7c), 8f in relation to (2), (3), (4), (5), (6), 8g, 8h in relation to (2), (3), (4), (5), (6), 8i in relation to

(2), (3), (4), (5), (6), 8j in relation to (2), (3), 8k in relation to (2), (3), (4), (5), (6), 8l in relation to (2), (3), 8m in relation to (1) (2), (3), (4), (5), (6).

## Detail of allegations

That being a UKCP registered psychotherapist since at least 2003, you Lee Laurence (the Registrant):

1. While working as a psychological practitioner at Kent & Medway Partnership NHS Trust (Trust) you entered into a personal and/or sexual relationship with Client A in the period February 2024 to January 2025.

**Denied**

2. On 27 February 2025, you were suspended from your role at the Trust.

**Denied**

3. On 5 June 2025, you were dismissed for gross misconduct due to entering into a personal and/or sexual relationship with Client A.

**Denied**

4. The decision and findings which led to your dismissal as set out at paragraph 1 is incongruent with what is expected of a UKCP registrant and related to your practice as a psychotherapist.

**Denied**

5. You did not report your actions at paragraph 1 above to UKCP.

**Denied**

6. You did not report the Trust's decisions at paragraphs 2 and 3 above to UKCP.

**Denied**

7. Your actions at paragraphs 1 – 6 above were

(a) Inappropriate; and/or

**Denied**

(b) Unprofessional; and/or

**Denied**

(c) Dishonest; and/or

**Denied**

(d) Sexually motivated concerning allegation 1.

**Denied**

8. The behaviours set out at 1 – 6 above are in breach of UKCP's Code of Ethics and Professional Practice (2019). In particular, you:

(a) Failed to act in Client A's best interests, thereby breaching clause 1 of the Code.

**Denied**

(b) Failed to treat Client A with respect, thereby breaching clause 2 of the Code and specifically in relation to allegation 1 and 7.

**Denied**

(c) Failed to respect Client A's autonomy, thereby breaching clause 3 of the Code and specifically in relation to allegation 1 and 7.

**Denied**

(d) Had sexual contact and/or a sexual relationship with Client A, thereby breaching clause 4 of the Code and specifically in relation to allegation 1 and 7.

**Denied**

(e) Abused and/or exploited your relationship with Client A for any purpose including your emotional or sexual gain, thereby breaching clause 5 of the Code and specifically in relation to allegation 1 and 7.

**Denied**

(f) Harmed Client A, thereby breaching clause 6 of the Code and specifically in relation to allegation 1 and 7.

**Denied**

(g) Failed to decline any gifts from Client A, favours, money or hospitality that might be interpreted as exploitative thereby breaching clause 7 of the Code and specifically in relation to allegation 1.

**Denied**

(h) Failed to recognise the power imbalance between the practitioner and client and engaged in a dual relationship with Client A, thereby breaching clause 8 of the Code and specifically in relation to allegation 1.

**Denied**

- (i) Failed to take reasonable care (taking into account the length of therapy and time elapsed since therapy) before entering into a personal relationship with Client A, thereby breaching clause 9 of the Code and specifically in relation to allegation 1.

**Denied**

- (j) 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.

**Denied**

- (k) Failed to safeguard Client A, a vulnerable adult, recognising your legal responsibilities concerning their rights and taking appropriate action should you consider any such person is at risk of harm, thereby breaching clause 35 of the Code.

**Denied**

- (l) Failed to report potential breaches of the UKCP Code of Ethics and Professional Practice to UKCP, thereby breaching clause 37 of the Code.

**Denied**

- (m) Failed to inform UKCP that you were suspended by an employer because of concerns relating to your competence, health or practice of psychotherapy, thereby breaching clause 39(d) of the Code and specifically in relation to allegations 2, 3, 5 and 6.

**Denied**

For the reasons set out above your fitness to practice is impaired by reason of misconduct and/or decision of another body.

## **Documents**

The Panel had placed before it the following documents:

- A principal bundle on behalf of UKCP amounting to 255 pages, hereafter referred to as C1;
- A secondary service bundle on behalf of the UKCP amounting to 39 pages, hereafter referred to as C2.

## **Hearing**

1. 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.

## **Preliminary Matters**

2. The Panel considered the following preliminary matters:

**(a) Proceeding in absence.**

- a. Ms Walmsley applied for the Panel to proceed in the absence of the registrant.
- b. She addressed firstly whether service had been made and adduced C2. This showed that on 3 December 2025 the Registrant was sent by email the formal notice of this hearing. Delivery by post was confirmed to have taken place on 8 December 2025. The Registrant therefore received the notice of hearing and service has been effective.
- c. The Panel was then taken through the correspondence between UKCP and the Registrant which began on 2 May 2025. On 10 June 2025 the Registrant was sent the complaint document and password for that, and on 12 June he was asked if he intended to appeal his dismissal by the NHS. He replied on 12 June 2025 stating that he was not going to appeal (but was “unhappy about the investigatory material and the way that has been presented as it does lack context, which is what I tried to argue in the hearing”). Over the following months correspondence encouraged the registrant to seek support and to respond to the allegations.
- d. The correspondence culminated with an email from the registrant dated 4 February 2026 in which he asked that the UKCP stop sending him emails about the hearing, stating that he will not return to membership, will not seek to return to the register and will not be attending the hearing.
- e. The legal advisor gave guidance.
- f. The Panel was satisfied that service had been effective on the basis of the evidence in C2.
- g. The Panel went on to consider whether it was appropriate to proceed in the absence of the registrant and decided that it was. The Panel considered that it is always preferable to have a registrant present and they will inevitably suffer prejudice by not being able to give evidence or make submissions on their own behalf. However, the Panel considered that four particular factors were such that it was, in the circumstances of this case, desirable to proceed. Firstly, the fact that a registrant has a duty to engage with a regulatory body and this Registrant has made a deliberate decision not to. Secondly the protection of the public is of paramount importance and in this case the severity of the allegations weighed heavily in the balance towards proceeding. Thirdly considering the fairness to UKCP both in terms of cost and resources, and their obligations to ensure expeditious and efficient disposal of allegations against registrants, this also points to it being preferable to proceed. Fourthly given the Registrant has stated he is not going to attend such that an adjournment would not result in a hearing with parties.

**(b) Approach to charges:**

- a. While the Registrant has admitted being in a sexual relationship with Client A, given his lack of engagement with UKCP, the Panel have proceeded on the basis that every allegation is denied.

**(c) Hearsay:**

- a. Ms Walmsley applied to rely on the evidence which had been before the NHS employer and their decision documentation. She did not intend to make a hearsay application unless the panel considered it would be necessary for her to reply on those documents.
- b. The legal advisor gave guidance, and noted that UKCP Rules permit reliance on the decisions of an employer, and for the panel to determine the admissibility of evidence.
- c. The Panel considered the fact that the registrant had the opportunity to participate in the investigation by the trust, and that there had been a thorough investigation. It was content to consider the evidence contained in the bundle without any need for a hearsay application.

**(d) Amendment:**

- a. After submissions the Panel asked UKCP whether it was seeking findings as to whether Allegation 7 amounted to a breach of UKCP Code of Ethics and Professional Practice as set out in sub paragraphs (b), (c), (d) (e) and (f) of allegation 8 as set out in the text below. UKCP confirmed that it did seek such an amendment, purely by way of clarification – not by way of adding to the matters which the Registrant had been informed of.
- b. The legal advisor provided advice, and the Panel had particular regard to the question of potential prejudice to the Registrant who was not present or represented, but who had been informed of the charges to be considered today.
- c. The Panel permitted an amendment to the “preamble” to paragraph 8, to add the words underlined. The Panel was satisfied that this was not a substantive amendment, but made it clear that allegation 7 was to be considered for five particular alleged breaches of Code, but was not within scope for the remaining 8 allegations.

“The behaviours set out at 1 – 6 above are in breach of UKCP’s Code of Ethics and Professional Practice (2019) (and in relation to sub paragraphs (b), (c), (d), (e) and (f) , allegation 7 is a further breach of the code)”

**Determination of Facts**

3. The Panel considered all of the documentary evidence before it, and heard oral submissions from Sophie Walmsley on behalf of UKCP. The Registrant was unrepresented and not present, nor did he send any written responses for consideration.
4. The Panel heard and accepted the advice of the Legal Assessor.
5. On balance, having fully considered the above, the Panel made the following findings:

- a. At all material times the Registrant was employed as a Psychotherapist at Kent & Medway Partnership NHS Trust (hereafter “the Trust”) and was on the UKCP Register. His employment included responsibility for conducting a “crisis group”. Client A was a member of that group between 5 April 2023 and 22 September 2023. On 19 December 2023 Client A contacted the Registrant following an overdose; the Registrant invited Client A back into the group where they remained until 6 March 2024. The Registrant and Client A had over 50 “contacts” of which 7 were cancellations and DNAs, and 3 group socials during this period. The Trust state that this Crisis Group “is for highly vulnerable patients with significant complex needs which you also confirm the patient had”; i.e. the Registrant accepted that Client A was a vulnerable person with significant and complex needs.
- b. On 26 February 2025 the Trust received correspondence (initially anonymously) from what later transpired to be Client A, about having been in a relationship with a member of staff. The Trust commenced an internal investigation. On 27 February 2025 a letter was sent to the Registrant suspending him. The Registrant did not inform the UKCP of this suspension.
- c. Client A engaged with the trust as part of the investigatory process. The Registrant was interviewed twice.
- d. While this investigation was ongoing, the Trust submitted a complaint to the UKCP on 15 April 2025 about the relationship between the Registrant and Client A and provided the fact-finding report which had been prepared.
- e. The fact finding conducted by the Trust included text messages between the Registrant and Client A between 3 February 2024 and 8 January 2025. Single space, these exchanges were set out over some 162 pages in bundle C1. This Panel has read all of the messages. The text exchanges were extensive (by way of example only, on 4 February they exchanged 19 messages between 9am and 10.20pm) and additionally they had addition to voice calls. Some texts indicate exchanges about psychotherapeutic matters; further facts are set out below in this regard in considering each allegation.
- f. The Registrant initially told the Trust that he had “not been involved with a patient sexually” but the investigation report goes on “as we spoke he told me that he had had sex with a female patient on a few occasions between April and December 2024 after the patient had left his group”.
- g. A disciplinary hearing was convened by the Trust and took place on 5 June 2025. It was accepted by the Registrant that he had a sexual relationship with Client A. The letter following that hearing stated:

*“We heard from both the presenting manager and yourself that there is no dispute that a sexual relationship took place between yourself and the patient (sic). There is however a discrepancy between when you feel the personal relationship started, as opposed to the evidence that we have received and heard today. It is evident from the*

*text messages that the personal relationship began in early February 2024, whilst the patient was still a group member receiving treatment, whereas you state that the relationship started post group in April 2024.”*

- h. The letter goes on to set out breaches of numerous Trust policies, and states:  
*“You demonstrated an awareness that you know that you should not exploit or abuse your relationship with clients (current or past) for any purpose, including your emotional or sexual gain as per the UKCP policy.*

*During the hearing, you also acknowledged that you breached boundaries and acknowledged that you did not seek enough support. You also did not discuss your concerns around the relationship with your manager, nor did you act in line with the Managing Conflict Policy. You stated that this was because you were feeling ‘guilty and shameful; you also explained that you felt overwhelmed and that the team was in a state of change; and the patients were complex and that in particular for this patient there was added pressure from her parents. The panel feels this does not justify the significant breach in professional behaviour and trust policies.”*

- i. The Registrant was dismissed by letter dated 5 June 2025. The Registrant did not inform UKCP of this (the dismissal letter confirmed that the Trust would report the outcome to the UKCP).

6. Allegation 1 – **Found Proved.**

*“While working as a psychological practitioner at Kent & Medway Partnership NHS Trust (Trust) you entered into a personal and/or sexual relationship with Client A in the period February 2024 to January 2025”.*

- a. At all material times the Registrant was working as a psychological practitioner at Kent & Medway Partnership NHS Trust, in particular from April 2023 when he was engaged in delivering treatment to a crisis group which Client A attended until 6 March 2024.
- b. The Panel considered the formulation of this allegation, setting out “personal and/or sexual relationship”. The Panel are entirely satisfied that the Registrant entered into a personal relationship with Client A from February 2024 which persisted until January 2025. The Panel has relied not only on the findings and conclusions reached by the Trust, but also by considering the extensive text exchanges between 3 February 2024 and 8 January 2025. The Panel were satisfied that the number of messages, the timing of them – including late at night and over weekends, and that they were ended by the Registrant with “kisses” made it clear that they were in a personal relationship. It is clear that in February they were sharing a “hug” and were “hanging out together”. On

1 April 2024, Client A wrote that she had “figured out I first came to your house 3<sup>rd</sup> of Feb” and he replied, “oh coming up to a few months”.

- c. While this allegation covers the entire period of February 2024 to January 2025, this Panel has had regard, in the absence of the Registrant, to what he said to the Trust, and on which he seems to have placed some emphasis, namely that a sexual relationship had developed from April 2024 after Client A had left the therapeutic group on 6 March 2024. The Panel have therefore considered carefully whether it had evidence as to when a sexual relationship had been entered into.
- d. Client A set out in an email to the police (which she provided to the Trust on 13 May 2025) the following:

*“He continued to pursue things with me even though I was still under his care within the NHS mental health team. In the February 2024 he started to invite me on days out and ask me around to his. In February was the first time he did more than touch me and kissed me. At this point I was still under the mental health crisis group so vulnerable and not thinking rationally and easy to manipulate and use. In the March he still had a lot of power over me. I was used to do more than just kiss. We ended up doing bits together and he slept with me. In the April he declared he loved me and tried to manipulate my emotions and would tell me things like I love him ...,”*

- e. The Panel saw from text messages that in February 2024 Client A went to the Registrant’s home. The Registrant and Client A had physical contact (a hug), and it is apparent from the exchanges that Client A spent the night at the Registrants home on 23 February. On 3 March he refers to “missing your morning cuddle”. This may have been before the Registrant and Client A had sexual intercourse, but the Panel has concluded on a balance of probabilities that the two had entered into a “sexual relationship” before Client A’s attendance at the Registrant’s crisis group had ceased.
- f. Ultimately regardless of when the Registrant entered into a sexual relationship with Client A during the course of 2024, given her vulnerability and the extent of therapy they had been involved in, as set out below it was still inappropriate.

7. Allegation 2 – **Found Proved.**

*“On 27 February 2025, you were suspended from your role at the Trust.”*

- a. This is found proved by the evidence from the Trust.
- b. The Panel noted that while this is framed as an “allegation”, it is a factual record of what the Trust did in response to receiving the complaint from Client A.

8. Allegation 3 – **Found Proved.**

*“On 5 June 2025, you were dismissed for gross misconduct due to entering into a personal and/or sexual relationship with Client A.*

- a. Having seen the dismissal letter the Panel is satisfied this is proven.
- b. Again, this is a factual record of what the Trust did, having found that:  
*“The behaviours and actions that were carried out by yourself were an abuse of your position, a breach in professional boundaries and it is evident that there was a power imbalance. This is evidenced by you providing the patient with your personal contact details (including your mobile number); inappropriate content of text messaging, personal phone calls and photos; by inviting them to your home and giving them a key to your home; taking the patient on holiday; buying the patient gifts; socialising with the patient outside of the therapeutic relationship by spending whole days with the patient that were not part of the Crisis Group Socials, and by your own admission having sexual contact with the patient.”*

9. Allegation 4 – **Found Proved**

*“The decision and findings which led to your dismissal as set out at paragraph 1 is incongruent with what is expected of a UKCP registrant and related to your practice as a psychotherapist.”*

- a. The Panel noted that it was not in dispute before the Trust that Client A was vulnerable, nor was it disputed that the Registrant entered into a personal and then sexual relationship with her.
- b. The Panel set out in considering Allegation 7 whether these actions were inappropriate and/or unprofessional and/or dishonest, and/or sexually motivated.
- c. In considering Allegation 8, the Panel have made a finding of which provisions of the UKCP Code of Ethics and Professional Practice the Panel have found to have been breached.
- d. The Panel have no hesitation that the Registrant’s actions which led to his dismissal, were indeed incongruent with what is expected as a UKCP registrant.

10. Allegation 5 – **Found Proved**

*“You did not report your actions at paragraph 1 above to UKCP”.*

- a. The report made to the UKCP was from the Employer on 15 April 2025.
- b. No reports were made by the Registrant.

11. Allegation 6 – **Found Proved**

*“You did not report the Trust’s decisions at paragraphs 2 and 3 above to UKCP.”*

- a. As above, reports were made by the Trust.

12. Allegation 7 -

*“Your actions at paragraphs 1 – 6 above were;”*

- (A) *Inappropriate; and/or –*

**Proven in relation to Allegations (1), (4), (5) and (6). Not proven in relation to Allegations (2) or (3).**

- a. The Panel is satisfied that Allegations (1), (4), (5) and (6) are all actions of the Registrant which were inappropriate. There is no question that the factual matters leading to the suspension and dismissal were highly inappropriate and the Registrant should have reported these matters to the UKCP.
- b. The fact of suspension and the fact of dismissal were acts of the Trust. As they were not actions of the Registrant they cannot be found to be inappropriate. The Panel therefore does not uphold that allegations (2) and (3) were behaviours of the registrant which were inappropriate.

*(B) unprofessional; and/or*

**Proven as to Allegations (1), (4), (5) and (6), Not proven as to Allegations (2) and (3).**

- a. Again, the Panel considered that the Registrant's actions were unprofessional in relation to allegations (1), (4), (5) and (6). Allegations (2) and (3) were in fact not about the acts of the Registrant but the acts of the Trust. There is no doubt that the behaviours which led to the suspension and dismissal were inappropriate and unprofessional, but the suspension and dismissal were not "actions" of the Registrant.

*(C) Dishonest and/or;*

**Proven (1), (5) and (6). Not proven as to Allegations (2), (3) or (4).**

- a. The submissions on behalf of UKCP relied firstly on the Registrant having initially denied when asked by the Trust, being involved with a patient sexually, then in the same interview admitted having had a sexual relationship between April and December. The Panel has concluded that this initial answer was dishonest; the Registrant knew that it was, and subjectively it was certainly a dishonest initial answer.
- b. Secondly, UKCP submitted that the Registrant was dishonest concerning the dates of his sexual relationship with Client A. The Registrant said that he had had sex with Client A between April and December 2024. We have found that he entered into a sexual relationship with Client A prior to her final Group session on 6 March 2024. The Panel considered whether subjectively the Registrant might have been drawing a distinction between having sexual intercourse (in relation to which we are unaware when this first occurred) and entering into a sexual relationship. The Panel therefore considered whether it is possible that the Registrant did not have the requisite subjective element for dishonesty in this regard. However, on a balance of probabilities the Panel concluded that it was more likely than not that

the Registrant was subjectively dishonest as to when he entered into a sexual relationship and have no doubt that it was objectively dishonest.

- c. The third submission for UKCP as to dishonesty was the Registrant's failure to report his (mis)conduct, and failure to report his suspension and dismissal. There is no doubt that he was duty bound so to do and he was told in the dismissal letter of this obligation. While the Panel concluded that these failures were inappropriate and unprofessional, it does not follow from that whether it is also 'dishonest'. Was a failure to disclose what should properly have been disclosed 'dishonest'? Applying the *Ivey v Genting Casinos* [2017] UKSC 67 guidance, the Panel considered that the Registrant knew the information ought to have been disclosed to the UKCP, and he knew that his silence could be misleading and could undermine trust in the UKCP. The Panel therefore determined that in relation to allegations (5) and (6) the Registrants failure to report did amount to dishonesty.
- d. In relation to allegations (2), (3) and (4) the Panel did not consider these were matters which amount to the dishonesty on the part of the Registrant.

**(D) Sexually motivated concerning Allegation 1**

**Proven in relation to Allegation (1).**

- a. Pertaining to Allegation 1, this is proven.

13. Allegation 8 (as amended):

*The behaviours set out at 1 – 6 above are in breach of UKCP's Code of Ethics and Professional Practice (2019) and in relation to sub paragraphs (b), (c), (d), (e) and (f), allegation 7 is a further breach of the code) In particular, you:*

- (A) Failed to act in Client A's best interests, thereby breaching clause 1 of the Code.

**Proven in relation to allegations (1), (4), (5) and (6). Not proven in relation to (2) or (3).**

- a. As to Allegation (1) the Panel has no hesitation in concluding that entering into this personal and sexual relationship was not in the best interests of Client A. The best interests of the Client were to have a safe and appropriate therapeutic relationship, and the text exchanges between them show that there are significant times during the almost 12 months of their texts when Client A's mental health was declining, for example when she was self-harming. It is apparent that appropriate professional boundaries were not upheld.

- b. Allegation (4) is also proven because it would have been in Client A's best interests had the Registrant adhered to what was expected of a UKCP registrant and abided by the Code of Ethics.
- c. The Panel considered carefully whether it was in Client A's best interests to fail to report his own behaviour, his suspension or dismissal. The Panel noted that in relation to the suspension and dismissal those are reports which should have been made in February and June 2025 - after the end of the Registrant's relationship with Client A. However, the Panel still considered that the best interest of Client A (and all of the Registrants' clients) would have been best served by adhering to the reporting obligations in the Code been adhered to.
- d. The Panel was not satisfied the burden of establishing that the remaining allegations amounted to a breach of clause 1 of the Code.

(B) *Failed to treat Client A with respect, thereby breaching clause 2 of the Code and specifically in relation to allegation 1 and 7.*

**Proven in relation to Allegations (1), (4), (5), (6) and (7). Not proven in relation to Allegations (2) or (3).**

- a. The Registrant in commencing a relationship during or even very shortly after providing therapy is evidence of failing to treat Client A with respect. The Panel noted the absence of boundaries by the Registrant, particularly evidence in the extensive messages, for example in communicating with Client A's parents and commenting on therapeutic matters.
- b. It would also have shown respect to Client A had the Registrant abided by the Code of Ethics, and had he complied with his reporting obligations to UKCP, indicating the seriousness of his actions.
- c. The Panel were further satisfied that in acting inappropriately, unprofessionally, dishonestly and with sexual motivation showed a lack of respect for Client A.
- d. The actions of the Trust in suspending and dismissing the Registrant do not show the Registrant's failure to treat Client A with respect (though the underlying facts which led the Trust to suspend and then dismiss do evidence breaches of the Code).

(C) *Failed to respect Client A's autonomy, thereby breaching clause 3 of the Code and specifically in relation to allegation 1 and 7.*

**Proven in relation to Allegation (1) and (7), Not Proven in relation to Allegation (2), (3), (4), (5), (6)**

- a. The Panel considered that a client's autonomy involves looking at what they want and need. Here the Panel concluded that the Registrant disrespected Client A's autonomy in a number of ways, including prioritising his own needs and also his

sexual motivation. There was undoubtedly a significant power imbalance in a relationship which began as a therapeutic one, a conflation of personal and professional matters, and messages in which the Registrant expresses frustration that his advice was not being adopted by Client A. Client A looking back considered that she had been “manipulated” and “used”, and that the registrant had “a lot of power over me”.

- b. The Panel were satisfied that Allegation 1 showed a lack of respect for Client A’s autonomy, as did Allegation 7.
- c. The Panel was not satisfied the burden of establishing that the remaining allegations amounted to a breach of Client A’s autonomy were established by UKCP.

*(D) Had sexual contact and/or a sexual relationship with Client A, thereby breaching clause 4 of the Code and specifically in relation to allegation 1 and 7.*

**Proven in relation to Allegation (1) and 7(d). Not proven in relation to Allegations (2), (3), (4), (5) or (6), 7(a), 7(b) or 7(c).**

- a. This Panel is satisfied that the Registrant entered into a sexual relationship with Client A while she was still a client, and that this is in breach of clause 4 of the Code of Ethics which provides that registrants should not have sexual contact or enter into sexual relationships with clients.
- b. The Registrant in being sexually motivated (Allegation 7(d)) also breached clause 4 of the Code of Ethics.
- c. UKCP have not satisfied the burden of proof in relation to the remaining allegations.

*(E) Abused and/or exploited your relationship with Client A for any purpose including your emotional or sexual gain, thereby breaching clause 5 of the Code and specifically in relation to allegation 1 and 7.*

**Proven in relation to Allegation 1 and 7(d). Not proven in relation to Allegations (2), (3), (4), (5) or (6), 7(a), 7(b) or 7(c).**

- a. The Panel noted that this provision of the Code covers both current and past clients. The findings of fact that a personal and sexual relationship was entered into are such that we have no doubt that the Registrant abused his relationship for sexual gain.
- b. The Registrant told the Trust that [REDACTED] were relevant when he was entering into this relationship, indicating this was for his emotional as well as sexual gain.

- c. Given the imbalance of power and breach of professional boundaries, the Panel has no hesitation in accepting that Allegations 1 and 7(d) amount to a breach of clause 5 of the Code.
- d. UKCP have not satisfied the burden of proof in relation to the remaining allegations.

(F) *Harmed Client A, thereby breaching clause 6 of the Code and specifically in relation to allegation 1 and 7.*

**Proven in relation to Allegations 1 and 7, Not Proven for Allegation (2), (3), (4), (5), (6).**

- a. Clause 6 of the Code of Ethics and Professional practice states that a practitioner must not “harm or collude in the harming of your client or the clients of others”.
- b. The Panel noted that after the end of their relationship when making reports to PALS/ the trust and the police, Client A reported that while she had not suffered further deterioration in her mental health and denied nightmares and flashbacks, but she did report having memories which were “not pleasant”. The Trust considered that Client A had come across as anxious.
- c. The Panel noted that during her text exchanges with the Registrant, there were periods in which she made reference to her having an eating disorder, self-harming and engaging in punitive exercise.
- d. This misuse of power by the Registrant is more likely than not to have caused Client A further harm in the judgment of this Panel.
- e. Further, there is also evidence of specific harm as Client A reported adverse memories and she had to be supported by another practitioner.
- f. The Panel considered that the entering into the personal and sexual relationship with Client A, and the sexual motivation of the registrant, caused harm to Client A and therefore finds this charge proven in relation to Allegations 1 and 7(d).
- g. UKCP have not satisfied the burden of proof in relation to the remaining allegations.

(G) Failed to decline any gifts from Client A, favours, money or hospitality that might be interpreted as exploitative thereby breaching clause 7 of the Code and specifically in relation to Allegation 1.

**Not proven.**

- a. The findings of the Trust suggest that the Registrant paid for the holiday he and Client A went on to Croatia. There were also references to his buying her gifts such as flowers.

- b. Clause 7 of the Code instructs therapists to “decline gifts, favours, money or hospitality”. Ms Walmsley submitted that “the evidence is submitted to support a degree of exploitation given the imbalance of power, in terms of “favours” if this included her company and her time”.
- c. The Panel were not satisfied that this is the wrongdoing identified in this rule, and are not satisfied that breach has been proven.
- d. UKCP have not satisfied the burden of proof in relation to the remaining allegations.

(H) *Failed to recognise the power imbalance between the practitioner and client and engaged in a dual relationship with Client A, thereby breaching Clause 8 of the Code and specifically in relation to allegation 1.*

**Proven in relation to Allegation 1. Not Proven for (2), (3), (4), (5), (6).**

- a. There was a dual relationship between the Registrant and Client A as a personal, and then sexual relationship between the registrant and Client A commenced when she was still in therapy with him.
- b. The Panel consider that if a relationship begins with an imbalance of power – which it is clear was the position in this case – it is likely that the imbalance persists. Indeed, it is of note that the UKCP Code of Ethics and Professional Practice provides guidance as to former clients as well as existing clients.
- c. Furthermore, after Client A’s last attendance at group therapy on 6 March 2024, at a time when the Registrant admitted he was in a sexual relationship with Client A, on April 15<sup>th</sup> he offered to her that she could “join the group if you want to”. This shows the complete absence of appropriate boundaries.
- d. The Panel are also satisfied that the evidence contained in the messages shows an inappropriate breach of the observation of power dynamics both in relation to communications with Client A’s parents and in relation to comments about other members of the crisis team.
- e. The Panel are satisfied that Allegation 1 demonstrates a breach of Clause 8 of the Code of Conduct.
- f. UKCP have not satisfied the burden of proof in relation to the remaining allegations.

(I) *Failed to take reasonable care (taking into account the length of therapy and time elapsed since therapy) before entering into a personal relationship with Client A, thereby breaching clause 9 of the Code and specifically in relation to Allegation 1.*

**Proven in relation to Allegation 1. Not Proven to Allegation (2), (3), (4), (5), (6).**

- a. The therapy undertaken by the Registrant with Client A had taken place over a period of many months. As set out above, this Panel is satisfied that Client A was still a client when the Registrant embarked on a sexual relationship. Furthermore, given that the Registrant in his hearings before the Trust, accepted Client A was vulnerable and had complex needs (a matter which is apparent from the text messages [REDACTED] [REDACTED] it was foreseeable that she might need to return to therapy. She had ceased attendance in September 2023 and rejoined in December 2023. Thereafter having ceased attendance in March 2024 the Registrant appears to have offered her a place back in the group therapy sessions in his text of 15 April 2024.
- b. Even had the Panel accepted the Registrant's account of entering into a sexual relationship in April 2024 with therapy having ceased in March 2024, this Panel would have had no doubt in concluding that this showed a lack of reasonable care on the part of the Registrant. Put simply, it was unwise to have a sexual relationship with this vulnerable client at any time. They had over 50 therapeutic contacts of which 7 were cancellations and DNAs, and 3 group socials, over a period of a year after April 2023. The Registrant will have had significant insight into Client A's vulnerabilities.
- c. The Panel also note that in relation to the observation of appropriate boundaries, the Registrant admitted not being frank in his supervisions in relation to the "temptation he felt to have sex" with his patient.
- d. The Panel are satisfied that the Registrant did not exercise reasonable care before entering this personal relationship. In relation to Allegation 1 breach of Clause 9 of the Code of Ethics is therefore upheld.
- e. UKCP have not satisfied the burden of proof in relation to the remaining allegations.

(J) *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.*

**Proven in relation to Allegations (1), (4), (5) and (6), Not Proven (2) and (3).**

- a. Clause 32 of the Code requires registrants to act in a way which upholds the reputation of the profession and its members. The Panel has no hesitation in concluding that the Registrant breached this provision by entering into a sexual relationship with Client A. This undoubtedly brings the profession into disrepute and is injurious to its reputation.
- b. Furthermore, the Registrant blurred boundaries in relation to Client A's parents in his communication with them. The Registrant did not handle appropriately the level of risk

Client A faced when she was vulnerable, nor did he appropriately use the supervisory process. All these matters are injurious to the reputation of the profession.

- c. The failures to report to the UKCP were in breach of the Code which again brings the profession into disrepute because it diminishes the ability of the public to rely on there only being practitioners on the UKCP Register who comply with the Code of Conduct. It was of particular note that even when the registrant knew that the UCKP had been informed of his suspension, still did not of his own volition update them when he was dismissed.
- d. The Panel has therefore concluded that in relation to Allegations (1), (4), (5) and (6) there has been a breach of Clause 32 of the Code.
- e. The matters set out in Allegations (2) and (3) concern the actions of the Trust and the Panel does not conclude these demonstrate a breach of Clause 32.

- (K) Failed to safeguard Client A, a vulnerable adult, recognising your legal responsibilities concerning their rights and taking appropriate action should you consider any such person is at risk of harm, thereby breaching Clause 35 of the Code.

**Proven in relation to Allegation 1. Not Proven (2), (3), (4), (5), and (6).**

- a. As set out above, the Registrant accepted during the hearings before the Trust that Client A was “vulnerable”. Clause 35 sets out an obligation to “safeguard children and vulnerable adults”. There is no doubt that entering into a sexual relationship with a vulnerable client does amount to a failure to take appropriate action.
- b. There are a number of exchanges when reactions to Client A’s distress is inappropriate and amounts to failure to take appropriate action; including when she cut her legs and he introduced a sexual element in his reply commenting “your lovely legs, such a shame”, and he goes on to say that her behaviour led to him to feel that she was treating him “like a cunt”, focusing (using inappropriate language) on his emotional response rather than on her needs.
- c. The text messages demonstrate that required boundaries between therapist and client are entirely absent. The Panel also considered that the Registrant “sharing information” about being the recipient of praise as to his work and being supported to publish a group analytic paper about the crisis group (noting at times, Client A had been a member of this group) meant that Client A may have felt inhibited in seeking access to other treatment. At one point she states in her text that she would be careful not to use the name of the Registrant with two other practitioners.
- d. While the Registrant in his texts did at times encourage Client A to get appropriate help, there are other times he did not act appropriately. Nor does he appear to have taken appropriate action at times when it is apparent that risk to Client A was increasing -for example when she referred to self-harm and suicidality.
- e. The UKCP have not satisfied the client in relation to any of the other allegations.

(L) Failed to report potential breaches of the UKCP Code of Ethics and Professional Practice to UKCP, thereby breaching clause 37 of the Code.

**Proven in relation to Allegations (1),(4) (5) and (6). Not proven for (2) and (3).**

- a. Clause 37 requires registrants to “challenge questionable practice in yourself or others”, including reporting to UKCP.
- b. In this regard, the Panel noted that it was Client A reported this matter to the Trust, and the Trust reported it to UKCP. The Registrant initially did not want to admit any wrongdoing, and he it is apparent that he did not use supervisions or personal therapy effectively or at all. Nor did he, as set out above, self-report to UKCP has he was duty bound so to do.
- c. The breach of Clause 37 is made out in relation to Allegations 1, 4, 5 and 6. It is not made out in relation to the acts of the Trust who suspended and dismissed the Registrant.

*(M) Failed to inform UKCP that you were suspended by an employer because of concerns relating to your competence, health or practice of psychotherapy, thereby breaching clause 39(d) of the Code and specifically in relation to allegations 2, 3, 5 and 6.*

**Proven in relation to Allegation (6).**

- a. The obligation set out in Clause 39(d) of the Code is to report to the UKCP if a registrant has been suspended because of competence issues. The allegation which shows this breach is limited to Allegation (6).
- b. The other Allegations do not demonstrate a failure of the Registrant in relation to this specific duty.

14. In total, the Panel found 46 of the Allegations proven, indicating breaches of UKCP’s Ethical Principles and Code of Professional Conduct.

### **Determination of Misconduct**

15. This determination should be read in accordance with the Panel’s previous determinations.

16. In accordance with rule 7.23 of UKCP’s Complaints and Conduct Process, the Panel then went on to consider the question of misconduct. In addressing this question, the Panel took into account of the relevant information before it.

17. The Panel heard further submissions from Ms Walmsley on behalf of UKCP.
18. Ms Walmsley on behalf of UKCP invited the Panel to conclude that the facts found proved constitute misconduct. She provided written submissions which she supplemented orally. She submitted that in light of the factual findings with serious breaches of the ethical principles and provisions in the Code, it is misconduct with repeated breaches of the code over a long period of time. This is a case which meets the definition of misconduct.
19. 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.
20. 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 (no 2)** [2000] 1 AC 311. 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.”*
21. 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.”*
22. The Panel first considered the findings of fact set out above. In particular the Registrant had a professional role in the Trust and entered into a sexual relationship with a vulnerable service user. The Registrant did not access or engage appropriately in supervision. He was sexually motivated and entered into a dual relationship. When Client A raised a complaint the immediate reaction of the Registrant was to deny any sexual relationship initially, then he was dishonest as to the period of his sexual relationship and he was dishonest in omitting to proactively inform UKCP at any time.
23. In light of the above, the Panel determined that the Registrant had met the threshold of serious misconduct.

### **Determination of Impairment**

24. 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.

25. 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 practise 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 practise 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 practise. There must always be situations in which a panel can properly decide that the act of misconduct was, on the part of the Registrant, isolated and the chance of it being repeated in the future is so remote that his or her fitness to practise has not been impaired.

26. 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. Has in the past acted dishonestly and/or is liable to act dishonestly in the future.*

27. The Panel next considered whether the Registrant was liable to act in such a way in the future. The Panel had regard to any 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.

28. The Panel was also mindful that when considering impairment, it is entitled to have regard to the wider public interest in the form of maintaining public confidence in the profession and declaring and upholding proper standards. The Panel had regard to 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.”*

29. Submissions for UKCP were provided in writing, also supplemented orally. The guidance in Grant was addressed, noting that the task of this panel is to look both backwards and forwards. Ms Walmsley submitted that the registrant had acted so as to put patients at risk of harm, he had brought the profession into disrepute, had breached fundamental tenants of the profession and had also acted dishonestly in the past and was liable to do so in the future. She said that therefore a finding of impairment was required. The Trust found a lack of insight, and it was urged that this was a good indication for this panel. No substantive response had been submitted by the Registrant to change this position – though she warned that this is nevertheless an objective test for this Panel.
30. In considering the four questions a – d above, the Panel considered that all four limbs of the test have been met in terms of the Registrants acts and omissions in relation to Client A, and how he dealt with the complaint when he was confronted with it. He embarked upon a sexual relationship with a vulnerable Client, this continued for almost a year, and when confronted was dishonest about it. The Registrant did engage with the investigation and disciplinary process entered into by the Trust, but has declined to engage with UKCP either by attendance or by presenting any written response.
31. As the Registrant was not present this Panel read carefully the notes made by the trust as to what the Registrant had told them, including the profound impact the suspension by the Trust had on him. The Panel looked carefully at the dismissal letter which noted that during his disciplinary hearing he expressed regret and acknowledged that he had breached boundaries and had not sought enough support. The Registrant has however chosen not to engage in this process before the UKCP, and simply expressed his intention not to practice again.
32. The Registrant has chosen to leave this Panel completely without any reassurance that he might have gained any insight or engaged in any action to address his serious breaches of the Code of Ethics. The view of this panel is that therefore the Registrant is liable in the future to put patients at unwarranted risk of harm, he is liable to bring the profession into disrepute, is liable to breach fundamental tenants of this profession and is also liable to be dishonest. There is simply no evidence that this Registrant has taken any steps to rehabilitate himself.
33. The Panel therefore determined that the Registrant is currently impaired.

### **Determination on Sanction**

34. In accordance with rule 7.25 of UKCP's Complaints and Conduct Process, the Panel then went on to consider the question of sanction. This determination should be read in accordance with the Panel's previous determinations on the facts, misconduct and impairment.
35. The Panel heard further submissions from Ms Walmsley on behalf of UKCP.
36. Ms Walmsley again presented written submissions which she supplemented orally on behalf of UKCP. She referred the panel to the Indicative Sanctions Guidance and the need to safeguard the public and uphold the reputation of the profession. Having outlined aggravating and mitigating factors, she submitted that nothing less than a removal from the register would be sufficient to meet the overarching aims of public protection and public interest.
37. In reaching its decision, the Panel had regard to the UKCP's Indicative Sanctions Guidance 2019 ("the ISG") but exercised its own independent judgement.
38. The Panel heard and accepted the advice of the Legal Assessor. The Panel recognised that the purpose of any sanction is not to punish the Registrant, although that may be the consequence of a carefully weighted decision. The Panel recognised that any sanction must be proportionate and weigh the public interest with that of the Registrant.
39. The public interest includes the protection of members of the public, including clients; the maintenance of public confidence in the profession; and the declaring and upholding of proper standards of conduct and behaviour within the profession.
40. The Panel considered the sanctions available to it under rule 7.25 of the Complaints and Conduct Process in ascending order and was mindful that any sanction imposed should be the minimum that would be considered proportionate and appropriate in the circumstances.
41. The Panel considered the following aggravating and mitigating factors:

Aggravating:

- Client A was, and was known to the Registrant to be, vulnerable.
- The conduct took place over a long period of time and was repeated.
- Persistent and repeated breaches of professional boundaries.
- The behaviour was carried out knowingly, including plans such as going on a trip to Croatia.
- Initial denial and dishonesty
- Very limited evidence of insight, shown only by limited expressions of guilt and shame and acknowledgement of breach of boundaries.

- The Registrant having chosen not to participate in this process, the Panel had no evidence whatsoever of remediation, or assurances as to the likelihood of future breaches.

#### Mitigating:

In the absence of the Registrant the Panel sought to consider what the Registrant might have said to take matters at their highest on his behalf:

- Some evidence of insight in that the Registrant as he recognised breaches of boundaries, expressed regret, guilt and shame, and is noted as recognising the impact of his behaviour on Client A.
- While there is no specific evidence of good practice, this panel has no evidence of any previous concerns. The Panel did also remind itself of the references the Registrant made in text messages to his group being held in high regard and him being invited to write a paper about it.
- As to issues of personal mitigations such as stress or illness, the Panel noted that the Registrant considered that he had felt unsupported [REDACTED]

42. Having reviewed the competing factors set out above, the Panel went on to consider the appropriate sanction(s) in order of seriousness. It kept the issues of public protection and proportionality at the forefront of its consideration.

#### a. Apology

43. The Panel considered that neither a written nor a verbal apology reflected the seriousness of the case nor would it be sufficient to protect the public. No apology had been offered and there was no evidence from which to conclude that the Registrant would be willing to make such an apology now. There was no evidence to suggest an apology would be meaningful given the Registrant's lack of engagement.

#### b. Warning

44. The Panel adopts its above reasoning. It concluded that a written warning would not be sufficient to protect the public or public confidence in the profession. It would not meet the seriousness of the case and there was no evidence from which to conclude the Registrant would accept and learn from such a warning.

#### c. Written report or oral statement

45. The Panel adopts the above reasoning. A report or statement would not meet the seriousness of the case nor be sufficient to protect the public. There was insufficient evidence that the Registrant had accepted and reflected upon his wrongdoing. The fact that the Registrant did not attend also made this sanction inappropriate and inadequate.

#### d. Further training

46. The Panel adopts the above reasoning. Furthermore, it had seen no evidence of learning to date to meet the risks identified by the Panel. The purpose of training is to remedy shortcomings identified

and is generally appropriate where a Registrant has shown insight into their behaviour and identified training. There is absence of appropriate or sufficient insight and a lack of engagement means that there has been no identification of appropriate training.

e. Further supervision or therapy

47. The Panel adopts the above reasoning. It determined that supervision and therapy do not meet the seriousness of the case and would not protect the public. It noted that such supervision as the Registrant undertook during his prolonged course of misconduct was insufficient to protect the public. There was no evidence from which to conclude that further supervision or any form of therapy would do so.

f. Conditions of Practice Order

48. The Panel next considered whether the impairment could be addressed by placing conditions on the Registrant's practice. It determined that it could not. A Conditions of Practice Order did not address the seriousness of this Panel's findings. The Registrant did not attend and therefore did not make any suggestions as to conditions, and the Panel were unable to devise any conditions such as would protect the public. The failure to engage in this process also suggested to this panel an absence of appetite to engage in what would be required. This would not protect the public given the behavioural issues and serious misconduct identified.

g. Suspension Order

49. The Panel recognised that suspending the Registrant may protect the public in the short-term but it considered it would not do so in the long-term. The Panel was also of the view that suspension was not sufficient to maintain public confidence in the profession. The Registrant had engaged in a lengthy course of conduct involving breaches of boundaries and entering into a dual relationship, and then being dishonest about it. He caused harm to Client A and to the reputation of the profession. He had not demonstrated sufficient insight to date and the Panel has no evidence of reflection or a desire to remediate. There was no evidence from which to conclude that a period of suspension would engender such insight.

h. Removal from UKCP Register

50. Finally, the Panel considered removing the Registrant from the UKCP register. It adopted all its above reasoning and concluded that Removal was the only sanction proportionate to the seriousness of the case and such as would protect the public and public confidence in the profession. The Registrant had engaged in a prolonged course of egregious misconduct and has demonstrated very little insight into his impairment. He demonstrated at most extremely limited awareness of the harm he had caused to Client A or no awareness of the harm caused to the profession as a whole. There has been no evidence of reflection, learning, insight or consideration of how he may change to protect the public and the reputation of the psychotherapeutic profession. The Panel saw no evidence to

suggest that he was capable of such consideration or change. It therefore concluded that there remained a serious risk to the public and to the reputation of the profession. As such Removal was the only sanction that would protect the public and the profession.

51. The Panel was satisfied that no other sanction would mark the seriousness of the case or maintain public confidence in the profession or its regulator. No other sanction would demonstrate that such behaviour plays no part in the psychotherapeutic profession and was wholly contrary to the standards expected of a registered professional.

52. The Panel determined that the appropriate sanction is Removal of the Registrant from the UKCP Register.

#### **Application for an interim suspension order**

53. Ms Walmsley submitted that an Interim Suspension Order (ISO) was necessary to cover the appeal period in this case.

54. The Panel accepted the advice of the Legal Assessor.

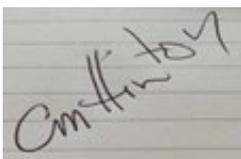
55. The Panel considered that an ISO was necessary to protect the public and was otherwise in the public interest. The interim suspension order will remain in place until the substantive sanction takes effect or until the conclusion of any appeal process.

#### **Right of Appeal**

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

57. The sanction outlined above will not take effect until after the 28-day period has lapsed. If no appeal is received the decision will take effect after the 28<sup>th</sup> day.

Signed,

A photograph of a handwritten signature in black ink on a light-colored background. The signature appears to be 'Catherine Hinton' written in a cursive style.

Catherine Hinton, Lay Chair

17 February 2026