

Social Worker: Donna Louise
Fallows
Registration Number: SW6045
Fitness to Practise
Final Order Review Meeting:

Hearing Venue: Remote meeting

Date of hearing: Friday 18 February 2022

Final Order being reviewed: Suspension Order – (expiring 3 April 2022)

Hearing Outcome: Removal Order (to take effect upon expiry of current Suspension
Order on 3 April 2022)

Introduction and attendees

1. This is the third review of a final suspension order originally imposed for a period of 12 months by a Fitness to Practise Committee of the Health and Care Professions Council (HCPC) on 6 September 2019. Social Work England is the successor body to the HCPC in respect of social workers and therefore has jurisdiction as narrated in paragraph 11 below.
2. Ms Fallows did not attend and was not represented.
3. Social Work England was represented by Capsticks LLP and their written submissions are set out within the notice of hearing letter.

Adjudicators	Role
Wendy Yeadon	Chair
Samuel Aweefo Ana-Amdingo	Social Work Adjudicator

Hearings Team/Legal Adviser	Role
Jenna Keats	Hearings Officer
Paige Higgins	Hearings Support Officer
Helen Gower	Legal Adviser

Service of Notice:

4. The panel of adjudicators (hereafter the panel) had careful regard to the documents contained in the substantive order review hearing service bundle as follows:
 - A copy of the notice of substantive order review hearing dated 4 February 2022 and addressed to Ms Fallows at her e-mail address as it appears on the Social Work England Register;
 - An extract from the Social Work England Register detailing Ms Fallows' registered address;
 - A copy of a signed Statement of Service, on behalf of Social Work England, confirming that on 4 February 2022 the writer sent the Notice of Hearing and related documents by ordinary by e-mail to Ms Fallows, at the e-mail address held by Social Work England.

5. The panel accepted the advice of the legal adviser in relation to service of notice.
6. Having had regard to all of the information before it in relation to the service of notice, the panel was satisfied that notice of this hearing had been served on Ms Fallows in accordance with Rules 16, 44 and 45 of Social Work England (Fitness to Practise) Rule 2019 (the “Rules”).

Proceeding with the final order review as a meeting:

7. The notice of final order review hearing informed the social worker that in line with the current government guidance concerning the COVID-19 virus (Coronavirus) pandemic, the review would take place electronically. The notice stated:

“If you wish to attend the electronic hearing, please confirm your intention by no later than 4pm on 11 February 2022. Unless we hear from you to the contrary, we shall assume that you will not be attending the electronic hearing and the adjudicators may decide to deal with the review as a meeting. If the adjudicators do hold a meeting, they will be provided with a copy of this letter setting out Social Work England’s submissions and a copy of any written submissions you provide.”

8. The panel took into account a telephone attendance note dated 9 February 2022 recording a conversation between Ms Fallows and a representative from Capsticks. Ms Fallows stated that she would not attend the review and that she had sent a letter to Social Work England stating that she was no longer pursuing a career in Social Work.

9. The panel heard and accepted the advice of the legal adviser with regard to Rule 16(d) of the Rules which provides:

“Where the registered social worker makes written submissions and states that they do not intend to attend before the regulator, the regulator may direct that the question of whether an order should be made is determined by means of a meeting.”

10. The panel accepted the advice of the legal adviser in relation to the factors it should take into account when considering this application. This included reference to the cases of *R v Jones [2003] UKPC*; *General Medical Council v Adeogba [2016] EWCA Civ 162* etc; and Rule 43 of the Rules.

11. The panel noted that Ms Fallows has clearly stated her position on more than one occasion that she does not wish to attend this review hearing and that she will no longer pursue a social work career. The panel decided that she has waived her right to attend a review hearing and that an adjournment would serve no purpose. It was in the public interest and Ms Fallows’ interests for the review to be concluded expeditiously. The panel was satisfied that it would be fair and appropriate to conduct the review in the form of a meeting in accordance with Rule 16(d).

Review of the current order:

12. This final order review comes under the Transitional and Savings Provisions (Social Workers) Regulations 2019 (the transitional regulations). The transitional regulations empower Social Work England to act as the successor body to the HCPC for the regulation of social workers. Accordingly, the review will be determined in accordance with Part 5 of the Regulations, Schedule 2 paragraph 15 of the Regulations and Social Work England's Fitness to Practise Rules.

The current order is due to expire at the end of 3 April 2022.

The Allegations found proved which resulted in the imposition of the final order were as follows:

13. The allegation as amended was that:

"Whilst registered with the HCPC and employed by Staffordshire County Council as a social worker:

- 1. On 21 August 2018, at Staffordshire Magistrates Court, you were convicted of, between 31/05/2016 and 14/10/2017, stealing money, to the value of £6,466.90, belonging to Staffordshire County Council. Contrary to section 1(1) and 7 of the Theft Act 1968.*
- 2. On 08 September 2016, at Staffordshire Magistrates Court, you were convicted of, on 05/05/2016 driving a motor vehicle after consuming so much alcohol that the proportion of it in your breath, namely 117 micrograms of alcohol in 100 millilitres of breath, exceeded the prescribed limit. Contrary to section 5(1) (a) of the Road Traffic Act 1988 and Schedule 2 to the Road Traffic Offences Act 1988.*
- 3. You did not inform the HCPC of your conviction at paragraph 2 above, during your application to re-register on or around 27 October 2016.*
- 4. Your actions as described at paragraph 3 were dishonest.*
- 5. The matters set out at paragraphs 3 and 4 above amounts to misconduct.*
- 6. By reason of your convictions and/or misconduct, your fitness to practise as a social worker is impaired."*

14. Ms Fallows did not attend the final hearing and the panel found the allegations proved by reference to the papers.

The previous final order review panel on 18 February 2021 determined the following with regard to impairment:

15. In considering the question of current impairment, the panel undertook a comprehensive review of the final order considering the current circumstances. It considered the decision of the previous substantive panel and review panel. However, it has exercised its own judgement in relation to the question of current impairment.
16. The panel had regard to all the documentation before it, including the decision and reasons of the original panel and the previous review panel and the new documentation provided by Ms Fallows in supplement of her written submissions. The panel also took account of the written submissions made by Social Work England and by Ms Fallows, which are each reproduced in full at paragraphs 33 and 34.
17. The panel heard and accepted the advice of the legal adviser. In reaching its decision, the panel was mindful of the need to protect the public and the wider public interest in declaring and upholding proper standards of behaviour and maintaining public confidence in the profession. The panel considered Social Work England's Sanctions Guidance. The panel held in mind that it must be satisfied that Ms Fallows' fitness to practise is impaired today considering what was said in *Khan v General Pharmaceutical Council* [2016] UKSC 64 and *GMC v Abrahaem* [2008] EWHC183 (Admin) and the persuasive burden on Ms Fallows to satisfy the panel she is no longer impaired. The panel was mindful of the forward-looking test for impairment and the need to take account of public protection in its broadest sense, including whether Ms Fallows' actions bring the profession into disrepute or whether they may undermine public confidence in the profession, and balance that against the registrant's own interest in being declared fit to practise.
18. The panel first considered whether Ms Fallows' fitness to practise remains impaired.
19. The panel observed that the previous reviewing panel was clear regarding the extent of the concerns that it identified in August 2020. The written determination sets out the risks that were then evident regarding public safety and public trust and confidence both in respect of Ms Fallows and of the wider profession. That panel set out a list of several factors that would assist Ms Fallows in demonstrating what she could do to meet the concerns and mitigate the risks. This was so that Ms Fallows could persuade this panel that she posed different and lesser risks today. To assist Ms Fallows, Social Work England had drafted a helpful list of conditions of practice. It is possible that Ms Fallows misconstrued the assumptions that underlay that offer of assistance, and she may have been deceived by this offer and the timescales by which she was invited to submit her evidence.
20. It may therefore be important to remind Ms Fallows that this process is two-fold. It is intended to protect the public by restricting social workers' practice to the extent necessary. It is also to facilitate, where possible, the safe return to practice of an otherwise safe, effective and fully restored social worker. The gateway to restoration is not barred by

sanctions which rest on current impairment; it is hinged by such sanctions. The gateway cannot be held open for a social worker. The social worker must take the initiative.

21. The social worker must first understand everything that has been said already about impairment by earlier panels. The courts have refined the core of impairment in any case in a series of written decisions. In the *CHRE v Grant and NMC* [2001] EWHC 927 (Admin) case, the judge said at paragraph 116 that *"When considering whether fitness to practise is currently impaired, the level of insight shown by the practitioner is central to a proper determination of that issue."* Panels on review look closely for evidence of insight by social workers into the damage and harm caused by the past failings found proved and the risks that such failings created and still exist. From that first step, panels consider carefully what evidence has been produced that shows a real grasp of the damage caused to service users, the damage caused to the trust and confidence in which the public hold the profession of social work, and the damage inflicted on the standards and values which fellow social workers adhere to. An appreciation by the social worker of the underlying causes of the failings is important, as is the effects of this on the social worker personally. However, the core of insight and remediation is an appreciation, deeply understood and so fully and practically addressed, that the public expects will so completely satisfy a panel that the harm done is in the past, will never be repeated, and the social worker can again be trusted, with full confidence, to serve the public conscientiously. Such a restored social worker will not be indistinguishable from the others who have not been subject to fitness to practise proceedings. They will be an example to them.
22. The panel read closely what had been written by Ms Fallows. At the core of what was written was a persuasive and impactful understanding of the personal factors that led Ms Fallows to act as she did. She has reflected on these matters already and the impression was given, no doubt unintentionally, that the reflections have not deepened or developed since first being set out for the substantive panel. The panel was concerned that in Ms Fallows' treatment of the drink driving offence, the reflections were tethered to her then circumstances. Appalling though they were and important to recognise, the panel had expected (based partly on the last panel's clearest directions given) for Ms Fallows to go on to explain her grasp of the impact that her conviction had on public safety in the context of professional standing as a social worker and not limited to the potential lethal effects on road users who she might have collided with (important though that is). She did not consider the issues that arise in the context of the overarching objective. That panel did not see a real grasp of the impact on the public and the dilution of trust and confidence, nor on the impact on fellow professionals. The impression was left that the matter was over and was to be regarded almost as a technical offence, dealt with in this context by the steps promulgated by criminal proceedings to facilitate an early end of a driving ban. In that regard, the panel was not provided with the certificates in relation to the advanced driving and alcohol awareness courses referred to.
23. In regard to both dishonesty findings, there was again an absence of reflection on the core issues. These were weighty matters that go to the heart of social work practice and its regulation. There was a clear explanation, grounded in personal circumstances, but nothing

more than that. There was no link that the panel could see between a possible grasp of attitudinal failings linking the deceit in the taking of money, and the concealment from her regulator of the driving matters. There was no explanation or reflection that would satisfy the public that the risk of repetition was removed and the risks to service users mitigated. That might begin in a reflection on the impact that the dishonesty had in a practical way, the struggle of fellow professionals to replace money, a scarce resource, that had been intended for the benefit of very needy service users. There were 54 transactions over 17 months, and at no time before detection did Ms Fallows confess her wrongdoing. She has yet to explain how her remediation would satisfy the public, service users and colleagues that they could again place full trust in her.

24. The panel considered that it could go further in explaining the seemingly comprehensive but in reality, somewhat superficial reflections by Ms Fallows. That would not assist Ms Fallows. She must address the failings proved, the risks and insight that she has developed in her own way. She is not obliged, and the public is not protected by Ms Fallows meeting a list of requirements suggested by others.
25. The panel considered that the misconduct is so serious and the risks so grave, that in the absence of real insight and reflection as at today, Ms Fallows' practice remains impaired.

The previous final order review panel on 18 February 2021 determined the following with regard to sanction:

26. Having found Ms Fallows fitness to practise is currently impaired, the panel then considered what, if any, sanction it should impose in this case. The panel had regard to the submissions made by Social Work England and Ms Fallows along with all the information and it accepted the advice of the legal adviser.
27. The panel considered the written submissions made by Social Work England, inviting the panel to consider imposing a conditions of practice order for 12 months. It noted the written submissions made by Ms Fallows that the appropriate action would be to impose conditions of practice given her insight, remorse, and work towards remediation. The panel also considered the Sanctions Guidance published by Social Work England.
28. The panel was mindful that the purpose of any sanction is not to punish Ms Fallows, but to protect the public and the wider public interest. The public interest includes maintaining public confidence in the profession and Social Work England as its regulator and by upholding proper standards of conduct and behaviour. The panel applied the principle of proportionality by weighing Ms Fallows' interests with the public interest and by considering each available sanction in ascending order of severity.

No Action

29. The panel concluded that, in view of the nature and seriousness of Ms Fallows' impairment which has not been fully remedied, and in the absence of exceptional circumstances, it would be inappropriate to take no action. Furthermore, it would be insufficient to protect the public, maintain public confidence and uphold the reputation of the profession.

Advice or Warning

30. The panel then considered whether to issue advice or a warning. The panel noted that neither of these sanctions would restrict Ms Fallows' ability to practise and is therefore not appropriate where there is a current risk to public safety. In any event, the impact of dishonesty had the potential to have wide-ranging adverse consequences for the confidence in which service users and the wider public must have in social workers. Some restriction on her practise is required. Therefore, the panel concluded that issuing advice or a warning would be inappropriate and insufficient to meet the public interest.

Conditions of Practice Order

31. The panel went on to consider a conditions of practice Order. The panel took the view that Ms Fallows' deficiencies are potentially capable of being remedied and was satisfied that, in theory, appropriate, workable conditions could be formulated. However, for the reasons already set out, the panel considered that M Fallows' limited insight and remediation meant that it could not have confidence that Ms Fallows would meaningfully engage with such conditions. The panel considered that taking the draft list helpfully prepared by Social Work England as a starting point, it would be necessary to add to the list, perhaps to the extent that it would become a suspension.

32. The Sanctions Guidance provides at paragraph 85 that:

"Conditions may be appropriate where public protection can be delivered by some restriction of practice, but it is not necessary for either public protection or wider public confidence grounds to suspend the social worker's registration. When considering public protection, decision makers must fully assess insight and any attitudinal behaviours to determine whether or not the social worker is capable of complying with conditions."

33. The panel considered that in Ms Fallows' case the lack of insight and the attendant risks to the public made it not possible to protect the public in this way. Panels are reminded by the Sanctions Guidance at paragraph 88 that:

"...when setting conditions that the primary objective is to protect the public. It is not the role of the regulator to take responsibility for directing how the social worker remediates. It is the social worker's professional responsibility to restore their fitness to practise, and part of any assessment of successful remediation will be how they have identified and acted on this personal responsibility."

34. The panel was satisfied that a conditions of practice order would not meet the requisite public safety element and would not serve to uphold the public's trust and confidence in the social work profession and its regulator.

35. The panel next considered a suspension order. It had regard to the Sanctions Guidance at paragraph 93 where it provides.

“In deciding on the period of suspension, decision makers should consider the need to protect the public and the wider public interest. They should balance this against the risk that prolonged suspension may result in deskilling. Where possible, it is in the public interest to support the return to practise of a trained and skilled social worker if this can be achieved safely. This means the risk of deskilling is a public interest consideration.”

36. The panel considered that the risk of de-skilling could be addressed by Ms Fallows’ taking online CPD courses accompanied by her reflections on them as appropriate. At present she has not satisfied the panel that she has processed and fully understood the issues that led to her initial suspension, such that the public would be protected now by some less restrictive sanction.

37. The panel considered that an additional period of suspension for 12 months would be enough time for Ms Fallows to build on her ‘...*brutal honesty*’ referred to by the substantive panel. The panel has no intention of acting punitively. A future panel like this one will be likely to have questions for Ms Fallows. The resulting dialogue is likely, in the panel’s view, to assist a future panel in assessing Ms Fallows’ then fitness to practise. Ms Fallows is not compelled to attend a future panel. However, she does have, as a registered social worker, an obligation to assist her regulator. That obligation is purposeful and not transactional. It is intended to facilitate the regulator in fulfilling its obligations to the public. This includes providing the means for panels to be satisfied that it is possible to restore Ms Fallows to practice because it can be judged to be safe and in the public interest to do so.

38. In the circumstances, the panel determined that the proportionate and appropriate sanction would be to further extend the Suspension Order from 3 April 2021 for a period of 12 months. This period will give Ms Fallows sufficient time to develop her insight into her past failings and work towards the completion of her full remediation, while also allowing time to consider carefully what has been written above.

39. The panel considered very carefully whether a Removal Order was appropriate at this time. However, the panel decided that a Removal Order today would be disproportionate and punitive. Nevertheless, the panel consider that there is a real possibility of removal should the Social Worker fail to demonstrate adequate insight and remediation to the next reviewing panel.

40. Accordingly, under Schedule 2, paragraph 15 (1) of the Regulations, the panel confirms that it further extends the existing Suspension Order by 12 months which is due to expire on 3 April 2021. The order will be subject to a mandatory review hearing before its expiry.”

41. This panel cannot bind a future panel. However, a future reviewing panel would expect Ms Fallows to attend the review hearing and it would be of assistance to that panel if she were able to provide evidence that she has undertaken significant steps that would facilitate a safe and effective return to the register without restriction. The panel has declined the

opportunity to create a list of matters that may assist a future panel, bearing in mind what has been written above.

Social Work England submissions:

42. The written submissions on behalf of Social Work England were set out in the Notice of Hearing dated 4 February 2022:

“At the review hearing on 18 February 2021, the panel expressed concerns regarding the Social Worker’s insight, remediation and commitment to demonstrating that her fitness to practise is no longer impaired.

The Social Worker has been in contact with the Case Review Team since the last review. She has made clear that she no longer wishes to pursue a career in social work and that she was not seeking to renew her registration. She has not provided any evidence of insight, remediation, training or development that would be expected to demonstrate that her fitness to practise is no longer impaired. She appears to have disengaged with social work and has made the decision not to engage with the upcoming review hearing, save for asking that her emails be put before the Panel.

Given that the Social Worker has made clear her intentions, and that there has been no further evidence as regards insight or remediation provided, Social Work England consider that the Social Worker’s fitness to practice remains impaired.

Social Work England consider that a Removal Order is now the appropriate and proportionate order to take. There is no other sanction which would sufficiently protect the public, maintain public confidence in the profession or maintain proper professional standards for social workers in England.

Social Worker submissions:

43. On 10 November 2021 Ms Fallows sent an e-mail to her case review officer. She stated:

“Over the past three years I have carefully been thinking about my life, career and future options and I have finally come to a decision that I no longer wish to pursue my social work career.

Actually being away from the social work environment for some time (which was all I knew and was good at), it has given me time to reflect and do some thinking about what is important and priority in life. I have given social services nearly 20 years of my hard work, commitment dedicated time and I no longer want the responsibility and emotional turmoil anymore.

I also cannot keep facing, professionals judging me and making lifechanging decisions about my future and life anymore. I have taken full responsibility that I have done wrong, of which I continue to be remorseful and extremely sorry. I just cannot both emotionally and physically keep putting myself through the upset and heartache, which I have to do every year in preparation for the panel.

I literally dread the panel date, every new year knowing that the time will be coming for me to once again, relive, reflect and resurface all my painful emotions about my past behaviour over and over again.

Therefore I have made the decision to no longer wish to pursue my social work career and I will not be renewing my social work registration. Could you please inform the panel, but also advise how I deregister."

44. Ms Fallows was advised that the option of removing herself from the register was not available.

45. In reply to a letter regarding the upcoming review hearing, Ms Fallows sent a further e-mail to her case review officer on 10 January 2022 which stated:

"Thank you for your e-mail. Just a brief reminder that on 10 November 2021, I sent you an email which clearly stated my future intentions and I asked you to share it with the members of the board at my next upcoming review. I can confirm that my decision to no longer renew my social work registration has not changed and I will no longer wish to pursue a social work career. Therefore, I will not be attending the review."

Panel decision and reasons on current impairment:

46. In considering the question of current impairment, the panel undertook a comprehensive review of the final order in light of the current circumstances. It took into account the decision of the previous panel(s). However, it has exercised its own judgement in relation to the question of current impairment.

47. The panel had regard to all of the documentation before it, including the decision and reasons of the previous review panel. The panel also took account of the written submissions made on behalf of Social Work England and Ms Fallows' written submissions.

48. The panel heard and accepted the advice of the legal adviser. In reaching its decision, the panel was mindful of the need to protect the public and the wider public interest in declaring and upholding proper standards of behaviour and maintain public confidence in the profession.

49. The panel first considered whether Ms Fallows' fitness to practise remains impaired.

50. The panel noted that Ms Fallows has chosen not to attend the review hearing and not to submit evidence to the panel. In the circumstances, the panel has no evidence before it of any change in circumstances since the last review panel. The panel noted that there was no evidence of any repetition of misconduct, but this alone was insufficient for the panel to reach a conclusion that Ms Fallows' fitness to practise is not impaired.

51. In the absence of any new evidence, the panel decided that Ms Fallows' fitness to practise remains impaired.

Decision and reasons on sanction:

52. Having found Ms Fallows' fitness to practise is currently impaired, the panel then considered what, if any, sanction it should impose in this case. The panel had regard to the submissions made along with all the information and accepted the advice of the legal adviser. The panel also took into account the Sanctions Guidance published by Social Work England.
53. The panel decided that its decision on sanction should respect the choice clearly made by Ms Fallows that she no longer wishes to pursue a career as a social worker. The panel also noted that the ongoing fitness to practise proceedings are having a negative impact on Ms Fallows for the reasons explained in her submissions. The panel decided that it was not in Ms Fallows' interests for the proceedings to be further protracted.
54. The panel was mindful that the purpose of any sanction is not to punish Ms Fallows, but to protect the public and the wider public interest. The public interest includes maintaining public confidence in the profession and Social Work England as its regulator and by upholding proper standards of conduct and behaviour. The panel applied the principle of proportionality by weighing Ms Fallows interests with the public interest and by considering each available sanction in ascending order of severity.

No Action

55. The panel decided that there were no exceptional circumstances which would justify the panel in taking no action in relation to the finding of current impairment.

Advice or Warning

56. The panel then considered whether to issue advice or a warning. The panel noted that neither of these sanctions would restrict Ms Fallows' ability to practise and is therefore not appropriate where the previous panel identified a current risk to public safety and that risk has not been mitigated.

Conditions of Practice Order

57. The panel went on to consider a Conditions of Practice Order. The panel decided that conditions would not be suitable or workable because Ms Fallows has disengaged from the review process and has made a clear decision that she does not wish to maintain her registration as a social worker.

Suspension Order

58. The panel considered the option of further extending the Suspension Order. The panel took into account the length of time Ms Fallows has been subject to a Suspension Order. The Suspension Order was first imposed on 6 September 2019 and it has been extended on two occasions. The panel decided that there would be no purpose in further extending the suspension order because Mr Fallows has made a clear decision not to continue a career in social work. Where there is no realistic prospect of rehabilitating a social worker to the

register it is not in the public interest for the review cycle to continue. For this reason, a Suspension Order would not be sufficient to uphold public confidence in the profession.

59. The panel decided that a further extension of the Suspension Order was not in Ms Fallows' interests. She has explained the reasons she no longer wishes to remain registered and the panel respected her choice.

Removal Order

60. The panel noted that a removal order is a sanction of last resort where there is no other means of protecting the public or the wider public interest. The panel took the view that a removal order was appropriate and proportionate because there would be no purpose in continuing the review cycle, Ms Fallows no longer wishes to remain on the register, and it would not be in the public interest for a social worker to remain on the register in these circumstances.
61. The panel therefore decided to make an order removing Ms Fallows from the register of social workers in England.

Right of Appeal:

62. Under paragraph 16 (1) (b) of schedule 2, part 5 of the Social Workers Regulations 2018, the Social Worker may appeal to the High Court against:
- a. the decision of adjudicators:
 - i. to make an interim order, other than an interim order made at the same time as a final order under paragraph 11(1)(b),
 - ii. not to revoke or vary such an order,
 - iii. to make a final order,
63. the decision of the regulator on review of an interim order, or a final order, other than a decision to revoke the order.
- a. Under regulation 16 (2) schedule 2, part 5 of the Social Workers Regulations 2018 an appeal must be made within 28 days of the day on which the social worker is notified of the decision complained of.
64. Under regulation 9(4), part 3 (Registration of social workers) of the Social Workers Regulations 2018, this order can only be recorded on the register 28 days after the social worker was informed of the decision or, if the social worker appeals within 28 days, when that appeal is exhausted.

This notice is served in accordance with rules 44 and 45 of the Social Work England Fitness to Practise Rules 2019.

Review of final orders

65. Under regulation 15 (2) and 15 (3) of schedule 2, part 4 of the Social Workers Regulations 2018:

- 15 (2) – The regulator may review a final order where new evidence relevant to the order has become available after the making of the order, or when requested to do so by the social worker.
- 15 (3) A request by the social worker under sub-paragraph (2) must be made within such period as the regulator determines in rules made under regulation 25(5), and a final order does not have effect until after the expiry of that period.

66. Under rule 16 (aa) of Social Work England's fitness to practise rules, a registered social worker requesting a review of a final order under paragraph 15 of Schedule 2 must make the request within 28 days of the day on which they are notified of the order.