

Social worker: Mark Nicholas
Kraus

Registration number: SW28287

Fitness to Practise

Final Order Review Meeting

Date of meeting: Tuesday 10 January 2023

Meeting venue: Remote meeting

Final order being reviewed:

Conditions of practice order (expiring 23 February 2023)

Hearing outcome: Impose a new order namely removal with effect from the
expiry of the current order

Introduction and attendees:

1. This is the review of a conditions of practice order originally imposed for a period of 12 months on 21 January 2022, following Mr Kraus' acceptance of the case examiners' proposed disposal.
2. Mr Kraus did not attend and was not represented.
3. Social Work England was represented by Capsticks LLP but no representative attended. Social Work England's written submissions are set out within the Notice of Hearing letter which was sent to Mr Kraus on 30 November 2022.

Adjudicators	Role
John Walsh	Chair
Rachael Kumar	Social worker adjudicator

Hearings Team/Legal Adviser	Role
Kathryn Tinsley	Hearings officer
Jo Cooper	Hearings support officer
Margaret Obi	Legal adviser

Service of Notice:

4. The panel of adjudicators ('the panel') had regard to the documents contained within the service and supplementary bundle, which included the following:
 - An extract from the Social Work England Register confirming the email address held by Social Work England for Mr Kraus.
 - A copy of the Notice of Hearing, dated 30 November 2022, addressed to Mr Kraus at his email address as it appears on the Register.
 - A copy of the email, dated 30 November 2022, enclosing the Notice of Hearing.
 - A copy of a Statement of Service, signed by a paralegal at Capsticks LLP, confirming that on 30 November 2022, the Notice of Hearing was sent to Mr Kraus' registered email address.
5. The panel accepted the advice of the legal adviser in relation to service of the Notice of Hearing.

6. The Notice of Hearing confirms the date and time of the hearing and that it would take place remotely. In these circumstances, the panel was satisfied that Mr Kraus has been given reasonable notice of the substantive review hearing. The panel concluded that the Notice of Hearing had been properly served on Mr Kraus in accordance with Rules 44 and 45.

Proceeding with the final order review as a meeting:

7. The panel noted that the Notice of Hearing stated:

*“If you wish to attend the electronic hearing, please confirm your intention **by no later than 4pm on 14 December 2022. Unless we hear from you to the contrary, we shall assume that you will not be attending the electronic hearing and Social Work England may, decide to deal with the review as a meeting** [emphasis in the original]. If Social Work England do hold a meeting, the adjudicators 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 also had 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.”

9. The panel was satisfied that it would be fair, proportionate, and appropriate to conduct the review in the form of a remote meeting for the following reasons:

- a. The panel noted that a representative from Capsticks LLP spoke to Mr Kraus on 01 December 2022. The telephone attendance note records that Mr Kraus:

“Would like this over with as has been going on for many years. Medical problems so unable to complete personal development.

...

...stated unlikely would attend but he would inform [Capsticks] and return the documents”

On 8 December 2022, Mr Kraus returned an unsigned and undated Written Submission Form that had been sent to him in which he stated:

“The inly (sic) statement that I wish to make is that I no longer wish and have no intention of practice (sic) social work in the future and further request that, I be removed from the register. Also, as previously stated I [PRIVATE]. If you require any more evidence regarding this, I can provide you with the names of the relevant consultants. In addition [PRIVATE].

The Hearing Participation Form which had also been sent to Mr Kraus was dated 10 December 2022. The box which states that Mr Kraus will not be attending the electronic hearing and understands that in his absence, the review may proceed as a meeting, had been ticked.

In these circumstances, the panel concluded that it is reasonable to infer that Mr Kraus' non-engagement is deliberate and that he has voluntarily waived his right to participate in these proceedings. Although the panel noted that Mr Kraus has health conditions there was no evidence before the panel that he was unable to attend the remote hearing for health reasons. The panel concluded that Mr Kraus has been given a reasonable opportunity to attend the hearing or to make detailed written representations.

- b. There has been no application to adjourn and no indication from Mr Kraus that he would be willing to attend on an alternative date and therefore re-listing this review hearing would serve no useful purpose.
- c. The panel acknowledged that there may be some disadvantage to Mr Kraus in proceeding with the hearing in his absence. However, the panel was satisfied that, he had made his position clear in the Written Submission Form and Hearing Participation Form. The panel concluded that in choosing not to request a hearing, any disadvantage to Mr Kraus was significantly outweighed by the strong public interest in ensuring that the review hearing is considered and determined as expeditiously as possible.

Review of the current order:

- 10. This final order review hearing is taking place under Paragraph 15(1) of Schedule 2 of The Social Worker's Regulations 2018 (as amended) and Social Work England's Fitness to Practise Rules 2019 (as amended).
- 11. The current order is due to expire at the end of 23 February 2023.

Regulatory concerns and background

Regulatory concerns

- 12. The regulatory concerns considered by the case examiners were as follows:
 - 1. *Whilst registered as a Social Worker with the Health and Care Professions Council*
 - 2. *You did not recognise and/or act upon safeguarding concerns relating to physical chastisement by Person A of:*

a. Child 1

b. Child 2, and

c. Child 3

3. In or around June 2018, you did not recognise and/or act upon safeguarding concerns relating to Person A's physical chastisement of Child 3.

Your actions as set out at Paragraphs 1 and 2 amount to misconduct.

By reason of your misconduct your fitness to practise as a Social Worker is impaired.

Background

13. The case examiners' decision refers to the background circumstances as follows:

"Information from the social worker's home local authority, including referral form and strategy meeting record, state that on 15 June 2018, Child 3 disclosed to school staff that they had been hit by Person A, a family member, including with a stick. Bruising was seen by professionals on Child 3's legs. Child 3 said the social worker, who is also a family member, was aware of this behaviour by Person A.

The social worker, at the time of social work involvement, did not dispute that they were aware of the physical chastisement of Child 1, Child 2 and Child 3 and there was no record of the concerns being raised by the social worker.

Information from the [Investigating Committee Panel] minutes state that the social worker states that they have not witnessed Person A hitting the children, although the children state they have.

Person A denies physically hitting the children throughout the evidence available. The police did not pursue prosecution of Person A and the children were not made subject to protection plan.

The [Investigating Committee Panel] on 23 September 2019 concluded that there was a realistic prospect of the facts alleged at regulatory concern 1 and 2 being found proved."

14. The case examiners' initial consideration of the regulatory concern took place on 21 October 2021. The case examiners noted that there was information to indicate that voluntary removal was discussed with Mr Kraus by the investigator but no evidence that this was presented to him for Social Work England to consider. The case examiners' decision summary states that an email was received from Mr Kraus, dated 27 July 2020, in which he appeared to make a well-informed request to sign a voluntary removal agreement but there was no evidence that this was progressed by the investigator. The case examiners also noted that, in correspondence with Social Work England, Mr Kraus indicated that he had not

worked in a social work position since 2018 and did not intend to return to the profession in the future.

15. The case examiners requested that Mr Kraus be given the opportunity to consider if he wished to complete a voluntary removal agreement.
16. The case was reconsidered on 16 November 2021 following receipt of a signed voluntary removal agreement from Mr Kraus dated 01 November 2021. The case examiners in considering impairment stated:

Personal Impairment

The case examiners are aware that when considering personal impairment, they must consider whether the conduct is remediable; whether the social worker has undergone remediation and demonstrated full and genuine insight; and, whether there is a likelihood of repetition.

Insight

The case examiners have not been provided with any insight from the social worker with regards to the regulatory concerns, though they consider the social worker to be capable of developing and demonstrating insight given there is evidence to confirm that they engaged well with social service involvement.

Remediation

The case examiners note that the social worker engaged with the local authority involvement with Child 1, Child 2 and Child 3. The case examiners have noted the progression of the case detailed by the children's allocated social worker. There is evidence put forward by the children's allocated social worker that the social worker was deemed a protective feature in the safety plan, moving from the local authority supervising contact between the children and Person A to the social worker supervising this contact. The case examiners note that the case progressed to be 'stepped down' to support from Early Help. Although the case examiners note that the social worker has not detailed their remediation it is evident from the evidence shared from the social worker allocated to safeguard the children.

Risk of repetition

Case examiner guidance (paragraph 19) states the risk of repetition is higher when the social worker fails to fully understand what they have done wrong; and that insight needs to be complete rather than partial. The case examiners note they have no submissions from the social worker to suggest that they fully understand the concerns raised. Although the case examiners have noted the signed voluntary removal agreement on which the social worker affirms that they "admit to the factual particulars as set out in the regulatory concerns" and "accept that your fitness to practice is impaired by reason of those regulatory concerns" this fails to demonstrate a full understanding as the social worker has not offered any insight into the concerns. Although the case examiners note information from a third party

which evidences a level of remediation by the social worker there is no evidence put forward which would demonstrate insight other than an acceptance of the regulatory concerns. The case examiners consider the risk of repetition to be present.

Public interest

The case examiners are aware that when considering public interest, they must consider whether there is a risk to the public; whether the alleged conduct represents a significant departure from professional standards; and whether the alleged conduct has the potential to undermine trust and confidence in the social work profession.

In this instance, the evidence would suggest that the social worker's lack of recognition of safeguarding concerns and subsequent inaction allowed Child 1, Child 2 and Child 3 to remain at risk of physical harm from Person A. This lack of protective response to safeguarding concerns is likely to undermine the public's confidence in social work as a profession.

...

Accordingly, the case examiners have concluded there is a realistic prospect that a finding of current impairment would be made by adjudicators, should the regulatory concern be found proven.

17. The case examiners concluded that it was in the public interest to bring the matter to a prompt conclusion, whilst also ensuring the public remains adequately protected, and determined that it was not in the public interest to refer the matter to adjudicators. Instead, the case examiners decided to invite Mr Kraus to agree to a disposal of this case without the need for a hearing.
18. The case examiners considered the voluntary removal agreement. The case examiners noted that the form signed by Mr Kraus asked for reasons as to why he wished to seek voluntary removal and he had simply referred to the standard statements outlined in the declaration. The case examiners also noted some conflicting reasoning by Mr Kraus in the wider evidence. In the absence of further reasoning, the case examiners were not satisfied that Mr Kraus had made it clear why he wished to be removed from the register and concluded that voluntary removal would not be appropriate.
19. The case examiners decided to invite Mr Kraus to agree to be subject to a 12-month conditions of practice order.
20. Social Work England subsequently received an 'accepted disposal response form' from Mr Kraus dated 27 December 2021. He confirmed that he had read the case examiners' decision and the further information about accepted disposals in the guidance document. He also confirmed that he understood the terms of the proposed disposal and accepted the proposal in full, without any suggested amendments.

21. On 21 January 2022, the case examiners determined that a 12-month conditions of practice order should be imposed.

22. The conditions of practice are as follows:

1. **You must notify Social Work England within 7 days of any professional appointment you accept or are currently undertaking and provide the contact details of your employer, agency or any organisation with which you have a contract or arrangement to provide social work services, whether paid or voluntary.**
2. **You must allow Social Work England to exchange information with your employer, agency or any organisation with which you have a contract or arrangement to provide social work or educational services, and any reporter or workplace supervisor referred to in these conditions.**
3.
 - a. **At any time, you are providing social work services, which require you to be registered with Social Work England, you must agree to the appointment of a reporter nominated by you and approved by Social Work England. The reporter must be on Social Work England's register.**
 - b. **You must not start or continue to work until these arrangements have been approved by Social Work England.**
4. **You must provide reports from your reporter to Social Work England every 3 months and at least 14 days prior to any review.**
5. **You must inform Social Work England within 7 days of receiving notice of any formal disciplinary proceedings taken against you from the date these conditions take effect.**
6. **You must inform Social Work England within 7 days of receiving notice of any investigations or complaints made against you from the date these conditions take effect.**
7. **You must inform Social Work England if you apply for social work employment / self-employment (paid or voluntary) outside England within 7 days of the date of application.**
8. **You must inform Social Work England if you are registered or subsequently apply for registration with any other UK regulator, overseas regulator or relevant authority within 7 days of the date of application [for future registration] or 7 days from the date these conditions take effect [for existing registration].**
9. **You must read Social Work England's 'Professional Standards' (December 2019) and provide a written reflection to Social Work England 6 months after these conditions take effect, focusing on:**

- How your conduct, of not reporting alleged physical abuse of a family member, allegedly fell below the accepted standard of a registered social worker.
- You should outline any potential impact of your conduct for example, on your practice, your family members, the wider public and the social work profession and what you should have done differently.
- Your reflective piece should also address any significant life or workrelated events that may have impacted on your decision making, at the time, and steps you are taking to ensure that such a response is not repeated in future.

10.

a. You must undertake CPD in relation to:

- A minimum of 2 hours on identifying safeguarding concerns relating to children
- A minimum of 2 hours on the impact of abuse on children
- A minimum of 2 hours on safeguarding procedures for children, to include procedures for your local area, which can be found on the local Safeguarding Children Partnership website

b. You must provide evidence of CPD undertaken to Social Work England within 8 months of these conditions taking effect.

11. You must provide a written copy of your conditions, within 7 days from the date these conditions take effect, to the following parties confirming that your registration is subject to the conditions listed at 1 to 10, above:

- Any organisation or person employing or contracting with you to undertake social work services whether paid or voluntary.
- Any locum, agency or out-of-hours service you are registered with or apply to be registered with in order to secure employment or contracts to undertake social work services whether paid or voluntary (at the time of application).
- Any prospective employer who would be employing or contracting with you to undertake social work services whether paid or voluntary (at the time of application).
- Any organisation, agency or employer where you are using your social work qualification/knowledge/skills in a non-qualified social work role, whether paid or voluntary. Y

You must forward written evidence of your compliance with this condition to Social Work England within 14 days from the date these conditions take effect.

12. You must permit Social Work England to disclose the above conditions, 1 to 11, to any person requesting information about your registration status.

Social Work England submissions:

23. Social Work England in its written submissions stated:

“Subject to any further indication from the Social Worker that he does wish to remain on the register then Social Work England will invite the Panel to consider a removal order. Should the Social Worker indicate he does in fact wish to remain on the register and have further opportunity to engage in remediation then Social Work England invite the Panel to extend the Substantive Conditions of Practice Order for a period of 12 months.

The Social Worker has provided a written reflection in accordance with condition 9. It is submitted that this does not address the concerns and appears to simply repeat the wording of the areas it was suggested the Social Worker focus on in the reflective piece, it lacks any depth of insight into the concerns.

CPD evidence (Condition 10) was due to be submitted on 23 October 2022. The Social Worker emailed on 18 October (prior to the deadline) stating he was unable to meet this deadline due to financial constraints and continued ill health. The Social Worker also stated on 20 October 2022- ‘Regarding my current health my whole I have [PRIVATE].’ This is the reason that the Social Worker has provided for being unable to comply with this condition.

On 25 October 2022 Social Work England wrote to the Social Worker with a 14 day warning letter given the CPD evidence had not been provided. This was followed up with a 7 day warning letter on 15 November 2022. The CPD evidence remains outstanding.

It is submitted that the Social Worker has not provided evidence of further remediation or retraining or demonstrated he is now able to recognise and act on safeguarding concerns. As such it is submitted that the Social Worker’s fitness to practise remains impaired. If the Social Worker maintains that he does not wish to work as a Social Worker in the future and wants to be removed then the most appropriate outcome is now removal. If the Social Worker does wish to remain registered then the Panel are asked to extend the conditions of practice by a further 12 months to allow him to undertake the required CPD / training and demonstrate remediation.”

Social worker submissions:

24. The only submissions Mr Kraus provided were those referred to in paragraph 9a above.

Panel decision and reasons on current impairment:

25. In considering the issue of current impairment, the panel undertook a comprehensive review of all the documentation contained within the hearing bundle which included:

- The case examiners' decision;
- Signed Voluntary Removal Form;
- Mr Kraus' written reflections;
- Three partially copied hospital letters;
- Various email correspondence from Social Work England to Mr Kraus.

26. The panel took into account the advice it received from the legal adviser as to the proper approach it should adopt. In particular that:

- i. The purpose of the review is to consider the current impairment based on the agreed disposal, the extent to which Mr Kraus has engaged with the regulatory process, the scope and level of his insight, and the risk of repetition.
- ii. The persuasive burden is on Mr Kraus.
- iii. In terms of whether the regulatory concerns have been sufficiently, and appropriately remediated, relevant factors include whether Mr Kraus:
 - fully appreciates the gravity of the previous panel's finding of impairment;
 - has kept his skills and knowledge up to date;
 - is likely to place service users at risk if he were to return to unrestricted practise.
- iv. The panel should take into account information relating to Mr Kraus' ability to practise safely and effectively and the wider public interest which includes promoting and maintaining proper professional standards of behaviour and promoting and maintaining public confidence in the profession.
- v. It is only if the panel determine that Mr Kraus' fitness to practise remains impaired, that it should go on to consider what, if any, sanction to impose by applying the guidance as set out in the Sanctions Guidance (SG) and the principles of proportionality which require Mr Kraus' interests to be balanced against the interests of the public.

27. As a consequence of Mr Kraus' non-attendance and in the absence of written submissions on the issue of insight and remediation, there was no evidence before the panel that he had acquired an understanding of the seriousness of the regulatory concerns or the impact of his conduct and behaviour on the safety and well-being of service users. The panel noted that Mr Kraus has not practised as a social worker since 2018. In the absence of any positive evidence of insight and remediation, the panel concluded that there has been no material change in circumstances, since the case examiners' decision in January 2021. Therefore, there remains a risk of harm to service users and a risk of repetition.
28. The panel noted that a significant aspect of the public component is promoting and maintaining public confidence and promoting and maintaining proper professional standards for social workers. Members of the public would be extremely concerned if a social worker was permitted to resume unrestricted practise in circumstances where the regulatory concern which led to a conditions of practice order had not been remediated. The panel concluded that, in these circumstances, a finding of no impairment would seriously undermine public trust and confidence in the profession and Social Work England as a professional regulator.
29. Therefore, the panel concluded that Mr Kraus' fitness to practise remains impaired.
30. The panel went on to consider what sanction, if any, to impose.

Decision and reasons on sanction:

31. The panel was mindful that the purpose of any sanction is not to punish Mr Kraus, but to protect the public and the wider public interest. The panel considered each available sanction in ascending order of severity.

No Action

32. The panel first considered taking no action. The panel concluded that, in view of the nature and seriousness of the regulatory concerns which have not been remedied, and in the absence of exceptional circumstances, it would be inappropriate to take no action on his registration. Furthermore, it would be insufficient to protect the public, maintain public confidence and uphold the reputation of the profession.

Advice or Warning

33. The panel then considered whether to issue advice or a warning. The panel noted that neither of these sanctions would restrict Mr Kraus' ability to practise and is therefore not appropriate where, as in this case, there is a current risk to public safety. In any event, the concerns regarding Mr Kraus' practise had the potential to have adverse consequences for service users and therefore some restriction on his 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

34. The panel went on to consider a conditions of practice order. The panel took the view that the regulatory concerns are potentially capable of being remedied and was satisfied that, in theory, appropriate, workable conditions could be formulated.
35. However, Mr Kraus is currently subject to conditions. The panel noted that Mr Kraus has provided a written reflection, in accordance with condition 9, but it does not address the regulatory concerns and simply repeats the wording of the areas it was suggested that he should focus on. Mr Kraus has not provided any reflections which demonstrates insight with regard to the risk to the public and the wider public interest. The panel also noted that there is no evidence that Mr Kraus has complied with condition 10. Although Mr Kraus referred to poor health and financial constraints there was no independent evidence to demonstrate that the failure to provide CPD evidence was due to either of these issues. The panel noted that the medical evidence consists of the horizontal top part of two hospital letters with handwritten notes and the vertical half of another hospital letter. The hospital letters did not assist the panel in fully assessing the reason for Mr Kraus' non-compliance with his conditions of practice order.
36. The panel took the view that Mr Kraus is either unwilling or unable to remediate the regulatory concerns and, in these circumstances, the panel had no confidence that he would comply with an extended conditions of practice order. Conditions are appropriate if a social worker is willing to comply and has the ability to demonstrate current fitness to practise, neither of which have been demonstrated by Mr Kraus.
37. Therefore, the panel concluded that a conditions of practice order was no longer appropriate or workable.

Suspension Order

38. The panel, having determined that an extension of the current conditions of practice order would not be appropriate, went on to consider whether to impose a suspension order. The panel noted that a suspension order would reaffirm to Mr Kraus, the profession, and the public the standards expected of a registered social worker. It would also prevent Mr Kraus from practising during the suspension period, which would therefore protect the public and the wider public interest. In addition, a suspension order would provide Mr Kraus with the opportunity to develop insight and take active steps to remedy the regulatory concerns.
39. However, there is no evidence before the panel that, during the previous 12 months, Mr Kraus has taken advantage of the ample opportunity he has been given to demonstrate a commitment to a return to practice and there is no indication that he will do so in the

future. In these circumstances, the panel concluded that imposing a suspension order would be an inappropriate use of the valuable resources of time and costs and there was no evidence before the panel that it would be in Mr Kraus' interests.

Removal Order

40. The panel determined that a removal order should be imposed on expiry of the current conditions of practice order. In reaching this conclusion the panel took into account paragraph 98 of the SG which states:

"A removal order must be made where the adjudicators conclude that no other outcome would be enough to protect the public, maintain confidence in the profession or maintain proper professional standards for social workers in England."

41. The panel took the view that the above paragraph applies to the circumstances of this case. The panel determined that there was no information available to indicate that Mr Kraus was willing to address the regulatory concern and the impact on his personal reputation and his profession as a whole. Nor was there any evidence before the panel that the risk of repetition and the risk to service users has been reduced. Mr Kraus has failed to take advantage of the opportunity to demonstrate that he is fit to return to the register unrestricted and there is no indication that giving him more time would make any difference. In these circumstances, the panel concluded that imposing a suspension order would serve no useful purpose.
42. In reaching this conclusion, the panel took the view that there was no public interest in maintaining Mr Kraus' name on the Register and subjecting him to a further review, particularly as he appears to have completely disengaged from these proceedings and has made it clear on more than one occasion that he has no future intention of practising as a social worker. The panel also concluded that Mr Kraus' repeated failure to address the serious concerns that have been identified, the absence of insight and his inability or unwillingness to engage with these proceedings is fundamentally incompatible with continued registration. With regret, the panel concluded that removal from the register is the only means to protect service users and the wider public interest.
43. Therefore, the panel concluded that no sanction lower than a removal order would be sufficient to protect the public and the wider public interest.

Right of Appeal:

44. Under Paragraph 16(1)(b) of Schedule 2 of The Social Workers Regulations 2018 (as amended), 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,
 - b. the decision of the regulator on review of an interim order, or a final order, other than a decision to revoke the order.
45. Under Paragraph 16(2) of Schedule 2 of The Social Workers Regulations 2018 (as amended) an appeal must be filed before the end of the period of 28 days beginning with the day after the day on which the social worker is notified of the decision complained of.
46. Under Paragraph 15(1A) of Schedule 2 of The Social Workers Regulations 2018 (as amended), where a social worker appeals against a decision made under sub-paragraph (1), the decision being appealed takes effect from the date specified in that sub-paragraph notwithstanding any appeal against that decision.
47. This notice is served in accordance with Rules 44 and 45 of the Fitness to Practise Rules 2019 (as amended).

Review of final orders:

48. Under regulation 15(1), 15(2) and 15(3) of Schedule 2 of The Social Workers Regulations 2018 (as amended):
- 15(1) The regulator must review a suspension order, or a conditions of practice order, before its expiry.
 - 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).
49. Under Rule 16(aa) of the Fitness to Practise Rules 2019 (as amended), a 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.

The Professional Standards Authority:

50. Please note that in accordance with section 29 of the National Health Service Reform and Health Care Professions Act 2002, a review decision made by Social Work England's panel of

adjudicators can be referred by the Professional Standards Authority (“the PSA”) to the high court. The PSA can refer this decision to the High Court if it considers that the decision is not sufficient for the protection of the public. Further information about PSA appeals can be found on their website at:

<https://www.professionalstandards.org.uk/what-we-do/our-work-with-regulators/decisions-about-practitioners>