



Social worker: Melissa Renahan
Registration number: SW100345
Fitness to Practise
Final Order Early Review meeting

Date of meeting: 28 May 2025

Meeting venue: Remote meeting

Final order being reviewed: Conditions of practice order (expiring 19 February 2026)

Hearing outcome: Impose a new order namely a suspension order for a period of 16 months with immediate effect.

Introduction and attendees:

1. This is an early review of a final conditions of practice order under paragraph 15(2) of schedule 2 The Social Workers Regulations 2018 (as amended) ('the regulations'). The order was originally imposed by way of an accepted disposal for a period of 18 months, commencing on 20 August 2024.
2. Ms Renahan 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
Gill Mullen	Chair
Jacqui Smith	Social worker adjudicator

Hearings team/Legal adviser	Role
Jenna Keats	Hearings officer
Molly-Rose Brown	Hearings support officer
Judith Walker	Legal adviser

Service of notice:

4. The panel of adjudicators had careful regard to the documents contained in the final order review service bundle as follows:
 - A copy of the notice of the early final order review hearing dated 22 April 2025 addressed to Ms Renahan at the email address which she provided to Social Work England.
 - An extract from the Social Work England Register detailing Ms Renahan's registered email address.
 - A copy of a signed statement of service, on behalf of Social Work England, confirming that on 22 April 2025 the writer sent by email to Ms Renahan at the email address referred to above: notice of hearing and related documents.
5. The panel accepted the advice of the legal adviser in relation to service of notice.
6. Having had regard to Rules 16, 44 and 45 of the Social Work England (Fitness to Practise) Rules 2019 (as amended) ('the rules') and all the information before it in relation to service of notice, the panel was satisfied that notice of this hearing had been served on Ms Renahan in accordance with the Rules.

Proceeding in the absence of Ms Renahan:

7. The panel accepted the advice of the legal adviser in relation to the factors it should take into account when considering whether to proceed in the absence of Ms Renahan. This included reference to Rule 43 of the Rules and the cases of *R v Jones [2002] UKHL 5* and *General Medical Council v Adeogba [2016] EWCA Civ 162*. The panel also took into account Social Work England's guidance 'Service of notices and proceeding in the absence of the social worker'.
8. The panel considered all the information before it. It noted that Ms Renahan had been sent notice of today's hearing in accordance with the rules, but she had not responded. The panel was satisfied that Ms Renahan was, or should be, aware of today's hearing and had not expressed a wish to attend or asked for an adjournment. The panel had regard to the note of a telephone conversation on 21 August 2024 in which Ms Renahan advised a Social Work England case review officer that she did not wish to practise as a social worker again and would not be engaging.
9. The panel also had regard to a file note indicating that Ms Renahan had called a Social Work England case review officer on 20 February 2025 and had left a voice message asking to be called back. A further file note stated that on 21 February 2025 the case review officer called Ms Renahan back but received no answer and left a voice message. Later the same day the case review officer sent an email to Ms Renahan confirming that she had tried to return Ms Renahan's call and inviting Ms Renahan to make contact if she would like to arrange a call. The panel noted that Ms Renahan's last communication with Social Work England appeared to be her voice message of 20 February 2025.
10. In these circumstances the panel did not consider that an adjournment would result in Ms Renahan's attendance and concluded that Ms Renahan had chosen voluntarily to absent herself. Having weighed the interests of Ms Renahan in respect of her attendance at today's review with those of Social Work England and the public interest in an expeditious disposal of this hearing, the panel concluded that it was fair and just to proceed in Ms Renahan's absence.

Proceeding with the early final order review as a meeting:

11. The notice of early final order review hearing informed Ms Renahan that the review may take place as a meeting. The notice stated:

"If you would like to attend before the adjudicators in order to make oral submissions, please confirm your intention by no later than 4pm on 7 May 2025. Unless we hear from you to the contrary, we shall assume that you do not want to attend a hearing and Social Work England may decide to deal with the review as a meeting. 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."

12. The panel accepted the advice of the legal adviser with regard to Rule 16(c) of the Fitness to Practise Rules 2019 (as amended) which provides:

“Where the registered social worker does not state within the period specified by the regulator whether they intend to attend before the regulator, the regulator may determine whether to make an order by means of a meeting.”

13. The panel received no information to suggest that Ms Renahan has indicated that she would like to attend today’s review and was satisfied that it would be appropriate to conduct the review in the form of a meeting in accordance with Rule 16(c).

Review of the current order:

14. This early final order review hearing is taking place under Paragraph 15(2) of Schedule 2 of The Social Workers Regulations 2018 (as amended) and Social Work England’s Fitness to Practise Rules 2019 (as amended).

15. Under paragraphs 15(2)(a) to (f), the regulator may review a final order early 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, and may:

- confirm the order
- extend, or further extend, the period for which the order has effect, provided that the extended period does not exceed in the case of conditions of practice order, three years
- reduce the period for which the order has effect
- substitute any order which the adjudicators or the case examiners could have made on the date on which they made the order
- revoke the order, and in the case of a suspension order may make the revocation subject to the social worker satisfying such requirements as to additional education or training and experience as apply to them
- revoke or vary any condition imposed by the order

16. The decision on a review under sub-paragraph (2) takes effect from the date on which the regulator completes the review notwithstanding any appeal against that decision.

17. The meaning of new evidence’ is not defined in the rules and regulations but Social Work England’s ‘Early Review Guidance’ does explore the meaning of the term stating that new evidence:

- “Must raise a realistic prospect that the order originally imposed is no longer appropriate or proportionate to address those concerns. It must be genuinely new evidence, which was not and could not have been made available to the decision makers when they imposed the order;”

- “New evidence almost certainly will be about events which have happened since the order was imposed;” and that
- “The new evidence must be verifiable.”

18. The current order is due to expire at the end of 19 February 2026.

The allegations which resulted in the imposition of the final order were as follows:

19. Whilst registered as a social worker between 17 July 2023 and 16 October 2023, you:

1. Did not maintain accurate and up to date records.
2. Did not inform the local authority social worker about identified risks relating to foster children, despite being instructed by management to do so.

The matter outlined in regulatory concern 1 and/or 2 amount to the statutory ground of lack of competence or capability.

Your fitness to practise is impaired by reason of lack of competence or capability

The case examiners determined the following with regard to impairment:

20. The concerns in this case were raised by Ms Renahan’s former employer, a fostering agency, where she worked from July 2023 to October 2023 when, following a probation review, she was dismissed.

21. When considering impairment, the case examiners referred to the case examiners’ guidance which explains that lack of competence or capability suggests a standard of professional performance which is unacceptably low. It means a social worker has demonstrated that they may lack the knowledge and skills to do their work in a safe and effective manner and this must usually be demonstrated over a fair sample of the social worker’s work.

22. In their reasoning the case examiners noted that concerns had been raised across Ms Renahan’s entire case load of ten fostering households, and for the entire period that she was employed by the fostering agency. They referred to evidence from within the probation review case report and minutes of the meeting held with Ms Renahan which suggested that Ms Renahan struggled to manage to upload records onto the case management system, claiming that this was due to time pressures across their case load. Also, within the probation review meeting on 9 October 2023, whilst Ms Renahan appeared to have general understanding of what needed to be recorded, she stated that she was ‘not 100% sure, and different people said different things.’

23. In respect of the personal element of impairment the case examiners noted that similar matters to the concerns raised in this case had been raised by a previous employer and Ms Renahan had been placed on a performance improvement plan by that employer but had resigned before completing the plan. The case examiners considered that this

suggested that there may be a pattern of conduct. Ms Renahan had not provided any submissions to the regulator. Therefore, the case examiners had no evidence of insight or remorse or of any remediation. Given Ms Renahan's non-engagement with the regulator, the case examiners noted that their ability to assess her insight was limited. In these circumstances the case examiners concluded that the risk of repetition was high.

24. In respect of the public element of impairment the case examiners considered the need to uphold proper standards of conduct and behaviour and the need to maintain the public's trust and confidence in the profession. The case examiners concluded that members of the public would be concerned where a social worker has struggled to maintain their caseload and record accurately, or at all in some cases, the work that they have undertaken with families and would expect a finding of impairment.
25. Accordingly, the case examiners were satisfied that there was a realistic prospect of adjudicators making a finding of current impairment on the ground of lack of competence or capability.

The case examiners determined the following with regard to sanction:

26. In respect of sanction the case examiners were of the view that Ms Renahan continued to pose some current risk to public safety as there was insufficient evidence of her having developed insight into her lack of competence and, as she was not currently in employment, she had been unable to demonstrate that she could practise safely. Accordingly, the case examiners concluded that no further action, advice or warnings would be inappropriate as they would not sufficiently protect the public.
27. The case examiners concluded that a conditions of practice order was the appropriate and proportionate outcome, which would provide Ms Renahan with a supportive framework to return to practice whilst also protecting the public. The case examiners decided that a period of 18 months would allow Ms Renahan to demonstrate, over a sustained period, that she had reached the standards required of social workers.

Social Work England submissions:

28. The panel noted the written submissions from Social Work England set out in the notice of hearing dated 22 April 2025 which read as follows:

"Social Work England have called an early review in this case as it is considered that the Final Order of Conditions of Practice is no longer workable or sufficient to protect the public. New information has come to light that is relevant to the Order, namely that the Social Worker is no longer willing to engage with the Order or to remediate her previous conduct.

Social Work England invite the reviewing panel to substitute the existing Conditions of Practice Order [and] with a Suspension Order for a period of 16 months.

The Case Examiners imposed the Conditions of Practice Order having found that the Social Worker had previously demonstrated a willingness to comply with conditions.

The Social Worker has breached the Conditions of Practice, namely Condition 15, and indicated that she does not intend to comply with the Conditions in future or work as a social worker.

Social Work England will submit that the Social Worker's fitness to practise remains impaired by reason of lack of competence / capability given that no steps have been taken by the Social Worker to remedy her impaired fitness to practise since the imposition of the final Condition of Practice Order in August 2024.

Social Work England submit that although the matters identified by the Case Examiners in respect of Regulatory Concerns 1 and 2 are capable of remediation, in theory, the Conditions of Practice imposed are no longer workable or sufficient to protect the public in light of the Social Worker's stated intention not to engage with them.

Although the Social Worker has previously indicated her desire to seek voluntary removal no such application has been received.

The Panel are therefore invited to find that the Social Worker's fitness to practise remains impaired by reason of lack of competence / capability and to replace the Conditions of Practice Order with a Suspension Order for a period of 16 months, given the Social Worker's current lack of demonstrated insight and remediation and her current and future lack of willingness to comply with conditions and / or to remediate. Social Work England submit that, in the circumstances, only a Suspension Order would be sufficient to protect the public and the wider public interest in this case.

The Suspension Order will be reviewed prior to its expiry, should the Social Worker decide to re-engage in future. Should the Social Worker choose not to engage further and not to return to practice, a reviewing Panel would be able to impose a Removal Order at the review of the Suspension Order given that the Social Worker will, by then, have been continuously subject to a final Conditions of Practice and / or Suspension Order for a period of two years, should that be appropriate and proportionate."

Ms Renahan's submissions:

29. Ms Renahan did not provide any submissions for today's hearing.

Panel decision and reasons on current impairment:

30. In considering the question of current impairment, the panel undertook a comprehensive review of the final order in light of the current circumstances, taking

account of any new information available since the conditions of practice order was imposed. However, it has exercised its own judgement in relation to the question of current impairment.

31. The panel accepted the advice of the legal adviser including reference to the case of *Abrahaem v GMC* [2008] EWHC 183 (Admin) which confirms that there is a persuasive burden on a registrant at a review hearing to demonstrate that previous concerns have been sufficiently addressed. The panel also took into account Social Work England's 'Impairment and sanctions guidance' (last updated 19 December 2022).
32. 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.
33. The panel had regard to all the documentation before it, including the case examiners' decision and the content of communications between Social Work England and Ms Renahan since the order was agreed and imposed on 20 August 2024.
34. This included details of a telephone conversation on 21 August 2024 between Ms Renahan and a Social Work England case review officer in which Ms Renahan stated that she wants 'all of this over' and that she dreads getting correspondence from Social Work England. Ms. Renahan said that she never wants to be a social worker again and there is nothing that would make her want to go back to social work. The case review officer asked if there was anything they could do to help in respect of communications. Ms Renahan said she understood she needed to be sent standard communications, and it was agreed that a friend of Ms Renahan who had been supporting her should be copied into future correspondence from Social Work England.
35. The case review officer mentioned voluntary removal and offered to send Ms Renahan the relevant guidance. The case review officer also explained that although Ms Renahan was not currently working as a social worker her conditions still apply although most of them will not be in effect. The case worker referred to condition 15, which requires a written reflection to be submitted by 19 February 2025, explaining to Ms Renahan that even though she is not in employment she must comply with this condition. Ms Renahan said she understood that she had this reflection to do, and to fill out the voluntary removal form because she wants to be considered for removal from the register. She also stated that even if the application is refused, she will continue to not engage and that her stance is not ever going to change.
36. On 27 August 2024 Ms Renahan's friend emailed Social Work England to ask whether the reflective piece which Ms Renahan was due to complete by February 2025 was a legal requirement and was it enforceable, commenting that it seems ludicrous that she was being asked to complete a piece of work for a role which she no longer works in and has no desire to work in again.
37. The panel noted that since August 2024 the only further communication from Ms Renahan to Social Work England was a voice mail left for the case review officer on 20

February 2025 in which Ms Renahan asked the case review officer to ring her back when she gets the message. The case review officer rang back the following morning but there was no answer, and they left a voice message and sent an email to Ms Renahan asking her to make contact if she would like to arrange a call.

38. The panel noted the case examiners' comments that Ms Renahan had not provided any submissions or evidence of insight, remorse or remediation which meant they could not assess her insight and therefore concluded that the risk of repetition was high.
39. The panel was confronted with the same situation today. There has been no effective engagement with the regulator and Ms Renahan has not complied with her conditions despite emails and a case review officer explaining to Ms Renahan on the telephone that condition 15 must be complied with even though she is not working as a social worker. In these circumstances the panel had no evidence of remediation or insight and concluded that the risk of repetition and harm to the public remained high.
40. In respect of the public element of impairment the panel agreed with the case examiners that members of the public would be concerned where a social worker has struggled to maintain their caseload and record accurately, or at all, the work that they have undertaken with families and would expect a finding of impairment. The panel considered that given the lack of any evidence of remediation or insight on the part of Ms Renahan, public confidence in the profession may be seriously undermined if a finding of current impairment was not made.
41. In these circumstances the panel concluded that a finding of current impairment was necessary to protect the public, uphold professional standards and maintain public confidence in the profession.
42. For the reasons outlined above the panel decided that Ms Renahan's fitness to practise remains currently impaired on the ground of lack of competence or capability.

Decision and reasons on sanction:

Impose a new order namely a Suspension Order for a period of 16 months with effect immediately:

43. Having found Ms Renahan's fitness to practise is currently impaired the panel next considered what sanction, if any, to impose. The panel had regard to all the information before it and accepted the advice of the legal adviser.
44. The panel considered the submissions made on behalf of Social Work England that only a suspension order would be sufficient to protect the public and the wider public interest in this case. Additionally, should Ms Renahan choose not to engage further and not return to practice, a period of 16 months would mean that Ms Renahan had been continuously subject to a final conditions of practice and/or suspension order for a period of two years which would enable a future reviewing panel to impose a removal order should that be considered appropriate and proportionate. Should Ms Renahan

decide to re-engage in the future the suspension order will be reviewed prior to its expiry.

45. The panel took into account the 'Impairment and sanctions guidance' published by Social Work England and was mindful that the purpose of any sanction is not to punish Ms Renahan 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 upholding proper standards of conduct and behaviour. The panel applied the principle of proportionality, weighing Ms Renahan's interests with the public interest.
46. The panel first considered whether to take no action or issue advice or a warning. The panel noted that none of these outcomes would restrict Ms Renahan's ability to practise and would not address the risk to the public if she was permitted to practise without restriction. Further, such a disposal may seriously undermine public confidence in the profession. Therefore, the panel concluded that taking no action or issuing advice or a warning would be insufficient to protect the public and the wider public interest.
47. The panel next considered a conditions of practice order. Although Ms Renahan's deficiencies are potentially capable of being remedied, this is dependent on her willingness to engage with remediation and comply with conditions. Despite clear advice that she must comply with condition 15 and submit a reflective piece by February 2025, and despite reminders of this deadline, Ms Renahan has not complied. In addition, Ms Renahan stated in August 2024 that she would not be engaging with Social Work England and that she never wishes to be a social worker again. In these circumstances the panel concluded that Ms Renahan would not be willing to comply with a conditions of practice order and that such an order would not be workable or appropriate.
48. The panel next considered a suspension order. The panel noted that it cannot consider a removal order today as Ms Renahan's fitness to practice is currently impaired on the ground of lack of capability or competence and she has not been suspended from practice or subject to a conditions of practice order for a continuous period of two years.
49. The panel considered that a suspension order would prevent Ms Renahan from practising during the suspension period, which would therefore protect the public and the wider public interest and it would provide a further period for Ms Renahan to engage with Social Work England should she change her mind about working as a social worker again. However, if Ms Renahan chooses not to engage with Social Work England and not to return to practice a future reviewing panel would be able to impose a removal order as she will have been suspended from practice or subject to a conditions of practice order for a continuous period of two years.
50. The panel therefore decided to impose a suspension order for a period of 16 months as this will allow Ms Renahan further time to consider whether she wishes work as a social

worker again and, if so, engage with Social Work England and demonstrate that she is willing to take steps that would facilitate a safe and effective return to practice. Otherwise, the period of 16 months will enable a future reviewing panel to consider imposing a removal order.

51. The suspension order will take effect immediately.

Right of appeal:

52. 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.

53. 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.

54. Under Paragraph 15(2A) of Schedule 2 of The Social Workers Regulations 2018 (as amended), the decision of a review under sub-paragraph (2) takes effect from the date on which the regulator completes the review notwithstanding any appeal against that decision.

55. This notice is served in accordance with Rules 44 and 45 of the Fitness to Practise Rules 2019 (as amended).

Review of final orders:

56. 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).

57. 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

58. 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>