

Social worker: Brenda Richardson

Registration number: SW106267

Fitness to Practise

Final Hearing

Dates of hearing: 31 January 2025 to 13 February 2025 and 21 July 2025 to
23 July 2025

Hearing venue: Remote hearing

Hearing outcome:
Fitness to practise impaired, removal order

Interim order:
Interim suspension order (18 months)

Introduction and attendees:

1. This is a hearing held under Part 5 of The Social Workers Regulations 2018 (as amended) (“the regulations”).
2. Mrs Brenda Richardson did not attend except for a short time towards the very start of the hearing and was not represented.
3. Social Work England was represented by Ms R Steels instructed by Capsticks LLP.

Adjudicators	Role
Philip Geering	Chair
Stella Elliott	Social worker adjudicator
Moriam Bartlett	Lay adjudicator

Titlee Pandey, Andrew Brown	Hearings officer
Jo Cooper, Ruby Wade	Hearings support officer
Zill-E-Huma	Legal adviser

Service of notice:

4. The panel of adjudicators (hereafter “the panel”) was informed by Ms Steels that notice of this hearing was sent to Mrs Richardson by email to an address provided by the social worker namely their registered address as it appears on the Social Work England register. Ms Steels submitted that the notice of this hearing had been duly served.
5. The panel of adjudicators had careful regard to the documents contained in the final hearing service bundle as follows:
 - A copy of the notice of the final hearing dated 16 December 2024 and addressed to Mrs Richardson at their email and postal address which they provided to Social Work England;
 - An extract from the Social Work England Register as of 16 December 2024 detailing Mrs Richardson’s registered address;
 - A copy of a signed statement of service, on behalf of Social Work England, confirming that on 8 January 2025 the writer sent by email to Mrs Richardson at the address referred to the above notice of hearing and related documents;
 - A copy of the Royal Mail Track and Trace Document indicating “pending” delivery to Mrs Richardson’s address.
6. The panel accepted the advice of the legal adviser in relation to service of notice.
7. Having had regard to Rules 14 and 15 of the Fitness to Practise Rules 2019 (as amended) (“the 2019 Rules”) and 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 Mrs Richardson in accordance with Rules 44 and 45 of the 2019 Rules relying on the

evidence of the Notice having been sent, including sent by email to Mrs Richardson's email address.

Preliminary matters:

Resumed application to postpone and an application to proceed with the hearing in the absence of Mrs Richardson:

8. The panel received a bundle of documents entitled "*Correspondence with the Social Worker*" containing records of emails and telephone conversations between Capsticks Solicitors (on behalf of Social Work England) and Mrs Richardson that took place, 30 January 2025 (being the day before this hearing commenced).
9. Within the bundle, it is clear Mrs Richardson seeks to apply for the hearing to be postponed due to a health issue.
10. Ms Steels, on behalf of Social Work England, advised the panel that the regulator opposes the application and applies for the hearing to proceed in Mrs Richardson's absence.
11. In the course of Ms Steels' submissions, the panel considered that it could be assisted by being informed whether or not Mrs Richardson was subject to an Interim Order. Having received further submissions and legal advice, the panel directed Ms Steels to inform the panel about the position regarding any Interim Order.
12. Ms Steels advised the panel that Mrs Richardson is subject to an Interim Suspension Order and has been "*throughout the proceedings*". She informed the panel of the history of the Interim Order, including eleven reviews and three High Court extensions, and that the Interim Order is currently due to expire on 27 November 2025, with reviews in the intervening periods.
13. The panel has considered the applications to postpone the hearing and to proceed in Mrs Richardson's absence.
14. Recognising the gravity of the allegations and the potential consequences for Mrs Richardson, the panel emphasised in its considerations the importance of fairness to both parties. The panel considers that it could benefit from having additional information in order to make a fair decision in this case.
15. The panel could benefit from receiving from Mrs Richardson the following:
 - a. Independent written medical evidence of health issue as follows:

[PRIVATE]
 - b. Evidence of the efforts and consideration she has given to find alternative caregivers to enable her attendance at the hearing.
 - c. Any other information she wishes to provide in support of her application to postpone the hearing.

16. Accordingly, the panel has decided, having received further submissions from Ms Steels, that it should adjourn this hearing until Tuesday 4 February 2025 to allow Mrs Richardson the opportunity to provide additional information.
17. Mrs Richardson should provide any additional information by close of Monday 3 February 2025.
18. The panel would encourage Mrs Richardson to attend the hearing when it resumes at 9:30am Tuesday 4 February 2025 so she can speak with the panel to put forward her case for a postponement of the hearing.

Resumed application to postpone and an application to proceed with the hearing in the absence of Mrs Richardson:

19. The panel reconvened on Tuesday 4 February 2025.
20. Social Work England was represented by Ms Steels.
21. Mrs Richardson attended the hearing by telephone and was not represented.
22. Mrs Richardson renewed her application to postpone the hearing. Mrs Richardson submitted that should the panel refuse her application to postpone and decide to proceed with the hearing, she would be unable to take part. Ms Steels, on behalf of Social Work England, opposed this application and counter applied to proceed with the hearing in Mrs Richardson's absence.
23. Mrs Richardson applied for the proceedings to be postponed on grounds relating to the health of a close relative. The panel considered the health issues in private.
24. **[PRIVATE]**
25. Mrs Richardson made oral submissions and answered questions from the panel but did not submit any further evidence in support of her application to postpone as directed by the panel on the 31 January 2025. Ms Steels renewed her application for the hearing to proceed in the absence of Mrs Richardson and made submissions in support of her application.
26. Mrs Richardson left the hearing at this stage.
27. The panel accepted the advice of the legal adviser in relation to the factors it should take into account when considering the two applications. This included reference to Rule 43 of the Rules and the cases of *R v Jones* [2003] UKPC; *General Medical Council v Adeogba* [2016] EWCA Civ 162.
28. The panel also took into account Social Work England guidance 'Service of notices and proceeding in the absence of the social worker' and the Social Work England 'Guidelines on postponements and adjournments of fitness to practise hearings', last updated on 16 December 2022.

29. The panel considered all of the information before it, together with the submissions made by Mrs Richardson and Ms Steels on behalf of Social Work England.
30. The panel decided that it would not grant the application to postpone and would grant the application to proceed in the absence of Mrs Richardson. It did so taking into account the following matters.
 - a. Although the formal notice of hearing went out at a later date, Mrs Richardson was advised in October 2024 that the hearing would be scheduled for these dates.
 - b. She advises that in November 2024 she was alerted to the health issue and that treatment for the health issue could coincide with the hearing dates. She did not raise this as a concern with Social Work England. Had she done so, further consideration could have been taken then to making appropriate arrangements, either for the hearing to be moved or for her to have support to attend the hearing.
 - c. In mid-January 2025 she was, on her account, aware that treatment for the health issue was to take place two days before the start of the hearing. She did not alert Social Work England then to the issue but states that she assumes she would still be able to attend the hearing. The panel finds that she was at fault in this regard: the treatment was reportedly (by her) of a significant nature, and she could not have been confident of attending. The appropriate course would have been for her to contact Social Work England as a matter of urgency. As it is, she only made contact the day before the hearing was due to start.
 - d. Social Work England guidance on postponement applications (provided to Mrs Richardson) states that if an application for postponement is to be made on the basis of a health issue, medical evidence to this effect should be produced (Part 5 of the guidance). The panel is not satisfied that Mrs Richardson has produced such evidence despite having been given an opportunity by the panel to do so. The panel acknowledges that the health issue does not concern her health directly but that of a close relative. Nonetheless, it remains a health issue and Mrs Richardson has provided very little information setting out what efforts she has made to obtain written evidence concerning the health issue.
 - e. The key document provided by Mrs Richardson is an NHS letter dated 15/1/2025 addressed to the close relative. Mrs Richardson has told the panel she was aware of the letter very soon after that date. Again, the panel is concerned that Mrs Richardson did not quickly contact Social

Work England after the 15 January 2025 but only did so on 30 January 2025.

- f. The NHS letter refers to “Elective Admissions”: in her statements to Capsticks, she is described as referring to “emergency surgery”. The panel is concerned that the two do not align.
- g. The NHS letter refers to “Day Surgery” under “general anaesthetic...” which does not appear to align with what Mrs Richardson has referred to which is significantly more serious, and which could reasonably have been anticipated to take longer than a single day.
- h. The panel also has in mind the reports of Mrs Richardson’s limited engagement with the disciplinary investigation at LCC, including when she is reported not to have attended one interview when she gave reasons that closely parallel her current reasons for needing a postponement. In addition, there is evidence of her engaging in a limited way with the regulatory process, including not responding to directed deadlines that have then been extended.
- i. The panel takes the view that it is entitled to approach this matter with a degree of professional scepticism, in that Mrs Richardson may be seeking to delay the hearing to avoid the potential consequences of the regulatory process.
- j. The panel also has in mind that the facts relating to this matter relate in part back to 2018, with significant events over 2019-2021, now several years ago. There is a public interest in the timely resolution of legal proceedings including these regulatory proceedings which would not support a postponement of the hearing.
- k. The panel has taken account of Ms Steels candid acknowledgement that the hearing was first listed in 2023 but postponed at the regulator’s request because of witness non-availability, and that the re-listing has been delayed because of resource limitations on the regulator.
- l. The panel is also mindful that ten witnesses are currently arranged to give evidence, some professional, some lay. Whilst the regulator’s case in part depends on documentary evidence, it is also clear that witness recollection is also relied upon. The panel’s concern is that memories will fade if further time is given.

31. Having taken all these matters into account, the panel is not satisfied that a good reason for postponing is established and that the balance of interests, even taking into

account fairness to Mrs Richardson and the benefit that may accrue to the panel in her attendance, is in favour of the hearing proceeding, including in the absence of Mrs Richardson should she not attend.

32. Accordingly, the panel refused Mrs Richardson's application for the hearing to be postponed and granted Social Work England's application for the hearing to proceed in the absence of Mrs Richardson.
33. The panel undertook to keep this matter under review in the event that further information was made available by Mrs Richardson. The panel also ensured that a daily communique was sent to Mrs Richardson advising her of the progress of the case, anticipated next steps, and specifically giving her notice of when she would have an opportunity of giving evidence should she wish to do so. The panel was advised that Mrs Richardson acknowledged receipt of early communiques, and in relation to the time when she could give evidence. The panel has been provided with a File Note dated 6 February 2025 recording the content of two telephone calls between Capsticks and Mrs Richardson. In the first call, Capsticks telephoned Mrs Richardson, but the call was not connected, and a voice message was left as follows:

"I explained who was calling and explained that I was calling further to the emails sent to her from Social Work England's hearings team regarding her attendance at the Hearing. I asked the Social Worker if she could review the email(s) and respond to the hearings team. I said that if she had any queries to give me a call."

34. The file note then records Mrs Richardson telephoning Capsticks a few minutes later. The file note of that call reads as follows:

"SW return call to MNR. SW said she was returning my call to confirm that she will not be attending the hearing tomorrow. SW said she has no evidence to provide. SW also explained that her daughter has been discharged from hospital. I asked if the SW had received the emails from Social Work England's Hearings Team and SW confirmed but explained that she is still not able to send emails and so has not been able to reply. I thanked the SW for confirming."

35. During the hearing, the panel took account of the various responses Mrs Richardson had provided about the allegations.

Application to amend the allegations:

36. Ms Steels on behalf of Social Work England made an application to amend a date in "Schedule A" of the allegation, namely (b) which currently reads "24 March 2019" and should read "24 March 2018". Ms Steels referred the panel to the relevant exhibit, a chart of the audit of mileage claims where it refers to "2018" not "2019". She submitted that the amendment was minor in nature and related to a typographical error. It was

further submitted by her that there was no prejudice caused to Mrs Richardson by the amendment as it is simply a typographical error that would have been clear from the face of the papers.

37. The panel received legal advice from the legal adviser. The Rules provide the adjudication panel with discretion to regulate its own procedure and conduct the hearing in a fair manner, as outlined in Rule 32.
38. The panel considered the prejudice to Mrs Richardson in respect of this late amendment but tempered that with the duty to ensure that cases are not under-prosecuted. Given the fact that the amendments were minor in nature and related to a typographical error in respect of a single date. The exhibits make clear the correct date. The panel considered that it was fair to amend.
39. Accordingly, the panel granted the application to amend the date.

Application for the hearing to be heard partly in private:

40. Of its own volition, and under Rule 38(b), the panel considered whether parts of the hearing should be heard in private, namely
 - those parts of the hearing during the application to postpone and application to proceed in absence when the health and related matters concerning a close relative of Mrs Richardson were considered;
 - those parts of Person 1's oral evidence that relates to his name, the child's name and his daughters' circumstances were to be in private; and
 - those parts of Person 2's oral evidence that relate to her name and the child's name.
41. No objection was raised by Ms Steels.
42. The panel accepted the advice of the legal adviser in relation to the factors it should take into account when considering this application. The panel were reminded of its discretionary power to hear part of the hearing in private where appropriate, having due regard to any of the parties' welfare. The panel was reminded of the need to balance the protection of any affected party's welfare with the public interest in open justice.
43. The panel decided that it was appropriate to exercise its discretion given that the evidence related to issues of health and issues concerning minors whose identities ought to be protected.
44. Accordingly, the panel directed that the following parts of the hearing were to be held in private:

- those parts of the hearing during the application to postpone and application to proceed in absence when the health and related matters concerning a close relative of Mrs Richardson were considered;
 - those parts of Person 1's oral evidence that relates to his name, the child's name and his daughter's circumstances were to be in private; and
 - those parts of Person 2's oral evidence that relate to her name and the child's name.
45. The remainder of the case would be heard in public in accordance with the public interest in open justice.

Further documentation relating to Person 1

46. The panel received documentation relating to Person 1 which is a communication between Capsticks on behalf of Social Work England and Person 1 during his interview when Person 1 had made reference to his contemporaneous notes, parts of which have been redacted. Ms Steels made no application for this document to be admitted as evidence. The panel took no account of this documentation in its decision-making process.

Allegations:

47. The allegations against Mrs Richardson arising out of the regulatory concerns referred by the Case Examiners on 17 September 2021 and 24 May 2022 are:

Whilst registered as a social worker and working at Lancashire County Council:

1. *On one or more of the dates identified in Schedule A, you submitted mileage claims which you knew not to be accurate to Lancashire County Council.*
2. *On one or more occasions, other than those identified in paragraph 1, between 11 November 2017 and 28 July 2019, you submitted mileage claims which you knew not to be accurate to Lancashire County Council.*
3. *Your behaviour at paragraphs 1 and/or 2 was dishonest.*
4. *You failed to retain your diary for years 2018-2019 for the 5 year period required at a minimum by Lancashire County Council.*

Whilst registered as a social worker and working at Rochdale Council between 28 September 2020 and 4 March 2021:

5. *On one or more of the dates identified in Schedule B, you requested and / or obtained payments from petty cash for service users without being able to*

provide sufficient receipts for this expenditure and / or without providing the cash to the service users.

6. *You did not complete statutory and/or non-statutory visits as required, and/or you failed to keep accurate and up to date case recordings in respect of;*

6.1 Service User A

6.2 Service User B

6.3 Service User C and/or Service User D

7. *You submitted a section 7 report to court, dated 22 January 2021, which contained inaccurate information, in that:*

7.1 You reported that Service User A stuck his fingers in his eyes until they bled which was untrue;

7.2 You referred to visiting Service User A and Person 2, when you had not.

8. *You failed to declare to your recruitment agency Social Personnel that you were subject to disciplinary investigation and / or a fitness to practise investigation.*
9. *On 8 March 2021, you did not advise your recruitment agency, Social Personnel, of the full reasons for your placement at Rochdale Council being terminated.*
10. *You did not self-refer the concerns raised by Rochdale Council to Social Work England.*
11. *Your conduct at paragraphs 5 and / or 6 and / or 7 and / or 8 and / or 9 and / or 10 was dishonest.*

Background:

48. On 3 October 2016, the social worker, Mrs Brenda Richardson started working at Lancashire County Council (“LCC”).
49. On 27th October 2017 Mrs Richardson moved to the Emergency Duty Team (“EDT”) at LCC.
50. On 26th August 2019 SS became Mrs Richardson’s manager at EDT at LCC.
51. On 5 September 2019, SS identified concerns in Mrs Richardson’s mileage claims, which she regarded as unusually high in volume, frequency, and destinations. Her concerns resulted in an internal investigation conducted by a senior manager, SR.
52. On 15 September 2019, Mrs Richardson tendered her resignation voluntarily from LCC, and two days later, on 17 September 2019, she was formally suspended by LCC due to concerns over her mileage claims.

53. LCC conducted an internal investigation during which Mrs Richardson initially denied falsifying the mileage claims, reportedly later admitted to doing so, and then denied it again. The investigation concluded that only 13 out of 78 of Mrs Richardson's mileage claims could be substantiated by evidence of a visit. For instance, in checking five of the 65 allegedly fraudulent claims, four had no recorded visits, and one had two visits, neither of which matched the claims made.
54. As part of the investigation, Mrs Richardson was asked to provide her diary, as she had suggested it might support her mileage claims. However, she did not produce it, stating she did not know where it was. She initially claimed it was at home, which she suggested was then at her mother's house, and finally said she may have thrown it away into the confidential waste bin at work. This was inconsistent with LCC's retention policy. Mrs Richardson has subsequently acknowledged non-compliance with the retention policy.
55. On 17 September 2019, following her suspension from LCC, Mrs Richardson self-referred to the Health and Care Professions Council ("HCPC"), the regulator at that time for Social Workers, and LCC also referred the same concerns to the HCPC on 21 September 2019. Later, Social Work England took over the matter as the regulatory body for Social Workers in England from 2 December 2019.
56. On 18 September 2020, Mrs Richardson joined the employment agency Social Personnel. It is alleged she failed to disclose that she was, or had been, under disciplinary and regulatory investigation when asked on the agency's registration paperwork.
57. On 28 September 2020, as a result of being registered with the employment agency, she began working at Rochdale Council ("RC"). She disclosed this employment to Social Work England on 8 January 2021, and her employment was subsequently terminated on 4 March 2021 primarily due to concerns over petty cash.
58. On 9 March 2021, Social Work England became aware of additional concerns raised by the employment agency, Social Personnel, about Mrs Richardson's conduct in work at Rochdale Council, leading to a further referral in addition to the earlier referral concerning LCC.
59. Mrs Richardson informed the agency Social Personnel that her termination was due to *"due to documentation not being up to date on the system"*. It is alleged that this was not a full explanation for why her employment was terminated at Rochdale Council, the primary reason for termination being the petty cash issue. She was alleged to have claimed and received money from petty cash multiple times without providing receipts. These claims involved various families, but when RC investigated, whilst Mrs Richardson claimed the money had been spent on families, but her record keeping was poor, five families reported to RC upon investigation that they had not received any money from Mrs Richardson.

60. During the internal investigation into the Mrs Richardson's petty cash claims, additional concerns in her practice were raised, including concerns she had not undertaken statutory and non-statutory visits to vulnerable children nor kept accurate records. The carers of these children later stated there had been no visits, or far fewer visits than recorded. In addition, concerns were raised regarding the accuracy of a Section 7 court report prepared by Mrs Richardson.
61. Mrs Richardson previously submitted a response to Social Work England's investigation. In summary, Mrs Richardson has denied, making false mileage claims at LCC, though she has admitted not complying with the LCC retention policy to keep her work diary. She has suggested the LCC allegations were "deliberate acts to sabotage her career" and complains about the treatment of her by management. In relation to the allegations involving petty cash at Rochdale Council, she has made denials. She has provided limited responses in relation to the allegations concerning visits and case records, but overall has denied falsification. She claimed that the agency, Social Personnel, had been aware of the HCPC investigation from the outset, that she had returned money to Rochdale Council, and that she believed Social Personnel was referring her to Social Work England, so she did not need to self-refer regarding the Rochdale Council concerns. She offered mitigating factors about her time at Rochdale Council including being without a manager and the team's pressure to close cases. Mrs Richardson provided several references that appear to support job applications rather than directly relate to the fitness to practice proceedings, but which do comment positively about her abilities as a Social Worker, and her honesty.
62. It appears that the allegations are disputed by Mrs Richardson and the panel has progressed the hearing on that basis.

Findings and reasons on facts:

63. The panel heard submissions from Ms Steels. It accepted the advice of the Legal Adviser with regards to the weight on hearsay evidence, dishonesty, the adverse inference as Mrs Richardson is not present, and character evidence. It recognised that the burden of proving each allegation rested with Social Work England and that the standard of proof required was the balance of probabilities. In relation to the allegations of dishonesty, the panel was referred to the test set out in *Ivey v Genting Casinos (UK) Ltd* [2017] UKSC 67.

Allegation 1

"On one or more of the dates identified in Schedule A, you submitted mileage claims which you knew not to be accurate to Lancashire County Council."

64. The panel has considered all the evidence presented and finds the allegation 1 proved on the balance of probabilities.
65. The evidence establishes that Mrs Richardson submitted the mileage claims in question and that those claims were inaccurate. The audit conducted by Social Work England, the contemporaneous records, and the witness evidence all support this conclusion. The audit, compiled by a senior manager at Lancashire County Council, is a detailed and reliable document which systematically cross-references the mileage claims with case notes. The panel acknowledges that the original claims submitted via Oracle are not available, but it is satisfied that the audit chart accurately summarises the claims and that its findings are consistent with other documentary evidence. The absence of supporting records in sixty-five of the sixty-eight claims examined further reinforces the conclusion that the claims were inaccurate. Google Maps analysis demonstrated that in three instances, the mileage claimed significantly exceeded the actual distance travelled, and in the remaining five claims listed in Schedule A, there were no visits corresponding with the claims.
66. Mrs Richardson has not denied submitting the claims, and the evidence confirms that they were made under her name through the council's electronic system. The panel is satisfied that the mileage claims were knowingly submitted by Mrs Richardson, that they required managerial approval, and that there is no evidence to suggest any fraudulent use of her credentials by another party. Having established that Mrs Richardson submitted the claims, the panel is satisfied that they were inaccurate. This finding is based on multiple sources of evidence, including sign-in and sign-out records, case management records, and the absence of any supporting documentation to indicate that the claimed visits occurred. The discrepancies identified were not isolated or minor errors but a repeated pattern of inaccurate claims over an extended period.
67. The panel places significant weight on the evidence of Mrs Richardson's admission on 21 October 2019, during a meeting with SR, the senior manager who was investigating the concerns on behalf of LCC. SR's evidence was that during the meeting with Mrs Richardson, she admitted making false claims because she was in a lot of debt and had broken up with her husband. SR conceded that she had not kept minutes of that meeting. However, she referred to an email, seen by the panel, sent by SR to her senior manager later in the day in which she records the following:

"Brenda ... stated she is accepting the allegation and confirmed that she has made the fraudulent claims (65 in total). She would like to state this in an email/statement in which she will accept the allegation and state why she has done this, i.e. spiralling debt and she will email this to me by Friday 25th November. She wants will [sic] engage in the disciplinary process but states she doesn't want to bring legal or union representation to a hearing and will not challenge what is being said but would like to conclude this asap before the 11th of November which is her last day of employment with LCC."

68. Mrs Richardson subsequently did email SR, but it contained a denial of making false mileage claims.
69. SR referred the panel to an email dated 26 November 2019 in which she replied to Mrs Richardson in the following terms:

“During that meeting we had a lengthy discussion about the situation and the allegations that had been made against you, which culminated in you advising me that you did not wish to access LCC/LAS records and admitting that you had falsified the mileage claims. I was therefore surprised to receive your subsequent correspondence in which you categorically denied the allegation.”

70. SR gave evidence that she later spoke to Mrs Richardson, challenged her about the denial, to which, according to SR, Mrs Richardson said that she had spoken to a Trade Union representative who had advised her not to make admissions.
71. The panel finds the evidence of an initial admission to be credible, given that it was made before formal proceedings commenced and having seen the contemporaneous email from SR recording the fact of an admission and having taken into account SR’s reaction to the subsequent denial which was to challenge Mrs Richardson.
72. The subsequent retraction of this admission, which occurred after the investigation progressed, is less persuasive, particularly considering the volume and pattern of discrepancies. The panel is satisfied that Mrs Richardson’s original statement aligns with the objective evidence and that her later retraction lacks credibility.
73. Mrs Richardson’s explanations have been carefully considered and found to be unconvincing. She suggested that the discrepancies could be attributed to joint visits with colleagues or student social workers. However, the panel is satisfied that this explanation has been fully investigated and that there is no supporting evidence within the case records or contemporaneous documentation to substantiate it. The review of case notes for other social workers did not identify any joint visits that could reasonably account for the discrepancies. Furthermore, it would be highly unusual for a student social worker to complete all records independently without any input from the supervising practitioner appearing on the records and which would have shown up in the audit conducted by SR.
74. The explanation that administrative or clerical errors were responsible for the discrepancies is similarly implausible. The evidence shows that sixty-eight inaccurate claims were made over a sustained period, and the audit demonstrates that the system contained safeguards to prevent such errors. The panel accepts the evidence of SR and SS, who both stated that the discrepancies could not have arisen from human error.
75. The panel has also considered Mrs Richardson’s suggestion that the investigation was conducted with the intention of discrediting her. However, the evidence does not support this assertion. There is no indication of animosity between Mrs Richardson and her managers prior to the investigation. The contemporaneous emails and supervision

records indicate that Mrs Richardson was offered support in relation to her personal and financial difficulties, rather than being subjected to unfair treatment. The panel finds that the audit was conducted in a methodical and impartial manner; the panel accepts SR's evidence that the starting approach of her investigation was to look for records showing that visits had been undertaken, rather than assuming wrongdoing by Mrs Richardson. The evidence suggests that the investigation was approached with fairness and neutrality, and there is no credible evidence to suggest that it was influenced by bias or improper motives.

76. The panel has carefully considered the evidence of the key witnesses and finds them to be reliable, honest, and professional. Each of the witnesses provided evidence based on their direct involvement in the investigation or the supervision of Mrs Richardson, and their accounts were consistent with the documentary evidence.
77. The panel found that SR conducted the audit with diligence and a clear investigative approach, taking steps to establish whether the mileage claims were justified before drawing conclusions. Her methodology, which involved cross-referencing multiple sources of information, was robust and demonstrates an impartial approach. Her evidence was detailed, logical, and supported by contemporaneous documentation. The panel based this finding on the evidence of SR which showed she had extended the audit to look at case records for the days either side of each day when mileage was claimed, and that she had gone on to look not only for evidence of a visit, but evidence of a need for a visit in case visits had, in error, not been recorded. In relation to each alleged false mileage claim, SR's evidence, which the panel accepted, was that she found no evidence of a visit being undertaken nor evidence of any need for a visit.
78. SS's evidence corroborated the audit findings and was presented in a measured and objective manner. She undertook further steps to examine whether joint visits could explain the discrepancies and concluded that they could not. Her evidence was fact-based and aligned with the records available.
79. BP and SS provided evidence regarding Mrs Richardson's financial difficulties and work environment, and their accounts were balanced and professional. They acknowledged Mrs Richardson's personal difficulties while maintaining objectivity regarding the concerns raised. Their evidence demonstrated that Mrs Richardson was offered support and that there was no pattern of managerial hostility towards her.
80. The panel finds that the key witnesses had no personal motive in the outcome of the investigation and that they approached their evidence with professionalism. The suggestion that they would have fabricated evidence or engaged in a deliberate attempt to discredit Mrs Richardson is entirely inconsistent with their conduct and the level of detail in their analysis. At no point did they express prejudgment, and their evidence was focused on factual findings rather than speculation. Their professional standing, years of experience, and adherence to investigative procedures provide further assurance of their credibility.

81. The evidence also showed that the audit conducted by SR identified thirteen mileage claims submitted by Mrs Richardson which did correspond with case records showing visits had been undertaken. The evidence of SS was that thirteen claims over the relevant period looked reasonable given the nature of the work undertaken by Mrs Richardson.
82. The panel is satisfied that the key witnesses presented truthful, accurate, and impartial evidence. Their evidence was supported by contemporaneous documentation and a clear commitment to professional integrity. There is no indication of fabrication, bias, or manipulation of findings. The panel finds them to be wholly credible and considers their evidence, alongside the documentary evidence, to be fundamental in helping the panel in reaching its conclusion.
83. The panel notes that it has not been provided with the sign-out sheets for the dates identified in allegation 1 and allegation 2. The evidence from witnesses indicates that these sheets had gone missing, which was regarded as unusual and unexplained. However, there has been no allegation that Mrs Richardson was responsible for their disappearance. The panel does not speculate as to the reasons for the missing sheets or draw any adverse inferences in relation to their absence.
84. Based on the weight of the evidence, the panel is satisfied that Social Work England has proved the allegation on the balance of probabilities and finds allegation 1 proved.

Allegation 2

“On one or more occasions, other than those identified in paragraph 1, between 11 November 2017 and 28 July 2019, you submitted mileage claims which you knew not to be accurate to Lancashire County Council.”

85. The panel has carefully considered the evidence in relation to allegation 2, namely that, *“on one or more occasions between 11 November 2017 and 28 July 2019, Mrs Richardson submitted mileage claims which she knew not to be accurate to Lancashire County Council.”* The panel finds that this allegation is proved on the balance of probabilities.
86. In reaching this decision, the panel considers the same body of evidence that was considered in relation to the first allegation, as the investigation, audit, and supporting records are applicable to both allegations. Allegation 1 was formulated to allow the panel to consider specific instances of falsified claims, while allegation 2 is a broader allegation designed to reflect the full extent of Mrs Richardson’s conduct over a sustained period. The panel is satisfied that the evidence demonstrates that the submission of false claims was not limited to the specific instances identified in allegation 1 but was part of a wider, systematic pattern of behaviour that took place over more than a year and a half.

87. The evidence from the audit conducted by LCCC, led by SR, provides a comprehensive and detailed analysis of Mrs Richardson's mileage claims. The audit systematically cross-references mileage claims with case records, Liquid Logic records, and Google Maps analysis to establish whether there was any basis for the claims submitted. It identifies a total of seventy-eight mileage claims made by Mrs Richardson during the relevant period, of which sixty-eight were found to be inaccurate, comprising sixty-five wholly falsified claims and three exaggerated claims.
88. The panel notes that the audit findings are based on objective, verifiable records and that the methodology used to examine the claims was rigorous and impartial. The audit identifies that the period of falsified claims spans from November 2017 to July 2019. This timeframe encompasses the entirety of the claims made by Mrs Richardson and provides a clear evidential basis for the panel to conclude that multiple additional instances of inaccurate mileage claims were submitted, beyond those specified in allegation one.
89. The panel further notes that SR's audit details, in the miles claimed column, the mileage Mrs Richardson stated she had travelled, and in the corresponding notes column, whether there was any recorded visit to substantiate that claim. A significant number of entries show no corresponding case record or documentation to support the mileage claimed, demonstrating that the claims were either entirely false or significantly inflated.
90. The sheer volume of such claims, covering an extended period and occurring on a repeated basis, eliminates any plausible suggestion that these were isolated errors, miscalculations, or administrative mistakes. The systematic nature of the discrepancies indicates that Mrs Richardson knowingly and intentionally submitted inaccurate claims.
91. The panel has also considered the witness evidence of SR and SS, both of whom provided clear, consistent, and professional evidence regarding the audit methodology and the steps taken to ensure accuracy. Both witnesses undertook a thorough review of the mileage claims, cross-checking each entry against all available records. SS's independent review corroborated SR's findings, further reinforcing the credibility and reliability of the audit conclusions. Their evidence establishes that significant effort was made to identify whether there was any legitimate basis for Mrs Richardson's mileage claims.
92. The fact that the discrepancies persisted over a prolonged period, across multiple claims, and involved a significant number of wholly false entries, further supports the conclusion that Mrs Richardson's conduct was deliberate rather than accidental.
93. Mrs Richardson has not provided any plausible or credible explanation for these inaccuracies. The explanations previously offered, including the claim that she may have undertaken joint visits with colleagues or student social workers, have been fully investigated and found to be unsubstantiated by any case records, witness accounts, or other documentation. The panel finds it highly improbable that so many false claims

could have arisen due to administrative oversight or genuine misunderstanding. The evidence before the panel indicates that the mileage claim system in place at Lancashire County Council contained safeguards designed to prevent input errors, and the sheer scale of the inaccuracies identified makes it implausible that these claims resulted from repeated mistakes.

94. Further, the panel places significant weight on Mrs Richardson's initial admission during the meeting on 21 October 2019, where she explicitly accepted that she had falsely submitted mileage claims. This admission was contemporaneously recorded by SR in an email to senior management, and Mrs Richardson cited financial difficulties and personal stress as her reasons for doing so.
95. The panel considers this spontaneous and contemporaneous admission to be compelling evidence of dishonesty. While Mrs Richardson later sought to retract her admission, this occurred only after formal proceedings had begun, and the panel finds the subsequent retraction to be self-serving and lacking credibility. The weight of the documentary evidence and the consistent findings of the audit are more persuasive than the later denial.
96. The panel is satisfied that there is clear, consistent, and compelling evidence that Mrs Richardson submitted numerous inaccurate mileages claims over a prolonged period, beyond those set out in allegation one. The audit findings, the evidence of SR and SS, and Mrs Richardson's own admission all point to a repeated and deliberate pattern of submitting false claims.
97. Applying the standard of proof on the balance of probabilities, the panel is satisfied that allegation 2 is proved.

Allegation 3

"Your behaviour at paragraphs 1 and/or 2 was dishonest."

98. The panel has carefully considered whether Mrs Richardson's conduct in submitting inaccurate mileage claims to Lancashire County Council, as set out in allegations 1 and 2, was dishonest. In reaching its decision, the panel applies the two-stage test established in *Ivey v Genting Casinos* [2017] UKSC 67. The first stage requires an assessment of Mrs Richardson's actual state of knowledge or belief at the time the claims were submitted, specifically whether she knew or believed that the mileage claims were inaccurate. The second stage involves determining whether, considering that knowledge or belief, her conduct would be regarded as dishonest by the standards of ordinary, decent people.
99. The evidence before the panel establishes that Mrs Richardson personally submitted the mileage claims in question. These claims were made through the council's Oracle system, and there is no evidence to suggest that they were submitted by anyone else on her behalf or that they resulted from clerical or system-generated errors. Mrs

Richardson has not disputed making mileage claims. Her argument has been, in responses to LCC and Social Work England, that she did not falsify claims. The audit conducted by LCC, led by SR, systematically reviewed the entirety of Mrs Richardson's mileage claims, cross-referencing them with case records, sign-in and sign-out sheets, Liquid Logic records, and contemporaneous emails.

100. The findings demonstrate that in sixty-eight out of seventy-eight instances, the mileage claims were either exaggerated or related to journeys that did not take place. This included sixty-five wholly falsified claims and three exaggerated claims. The period of falsified claims spans from November 2017 to July 2019, with the earliest instance recorded on page 319 of the audit bundle and the latest on page 292. The audit methodology was rigorous and impartial, providing a clear evidential basis for concluding that Mrs Richardson's conduct extended beyond isolated incidents and reflected a deliberate and sustained pattern of false mileage claims.
101. During a meeting on 21 October 2019, Mrs Richardson admitted to SR that she had falsely submitted mileage claims. She explained that she had done so due to financial difficulties and personal stress. This admission was recorded contemporaneously by SR in an email to senior management. The panel considers this initial admission to be credible, particularly as it was made before formal proceedings had begun. However, Mrs Richardson later sought to retract her admission. Given the volume and pattern of discrepancies identified, the panel finds her later retraction unpersuasive. The inconsistencies in her explanations, coupled with the extensive evidence obtained through the audit, reinforce the conclusion that she knew at the time of submission that the claims were inaccurate.
102. Having determined Mrs Richardson's knowledge and belief regarding the claims, the panel must assess whether her conduct was dishonest by the standards of ordinary, decent people. The nature and extent of the false claims are significant. A total of sixty-eight claims were found to be inaccurate, spanning an extended period, rather than being isolated or one-off errors. The panel finds that this demonstrates a pattern of behaviour rather than an accidental or administrative mistake. The systematic nature of the discrepancies, as evidenced in the audit, eliminates any plausible explanation of human error.
103. The panel finds that the mileage claims were deliberately submitted by Mrs Richardson, knowing they were inaccurate and false, and that she did so with the motive of financial gain to which she was not entitled. Her admission on 21 October 2019 to SR put her false claims for mileage expenses in the context of her financial difficulties.
104. In submitting these claims, Mrs Richardson received payments from public funds to which she was not entitled. While the panel acknowledges her explanation that she was experiencing financial hardship, this does not provide a justification for her actions or negate a finding of dishonesty.
105. As a registered social worker, Mrs Richardson had a professional duty to act with honesty and transparency, particularly in relation to financial claims made in the

course of her employment. When confronted, she initially admitted wrongdoing yet later attempted to justify her actions by offering alternative explanations. The panel has considered these explanations and finds that they are not supported by the evidence, further suggesting an awareness of wrongdoing on her part.

106. The panel also notes that the internal investigation was conducted in a fair and impartial manner, with no evidence of bias or any intent to unfairly discredit Mrs Richardson. The findings are based on contemporaneous documentation and cross-referenced records, all of which indicate that the claims made were knowingly inaccurate.
107. The panel is satisfied that, applying the objective standard, Mrs Richardson's conduct would be regarded as dishonest by ordinary, decent people. The deliberate submission of knowingly false mileage claims for financial gain, over a sustained period, in the absence of any legitimate justification, constitutes dishonesty.
108. Accordingly, the panel finds that Mrs Richardson acted dishonestly in submitting inaccurate mileage claims, in allegation 1 and allegation 2, applying the legal test set out in *Ivey v Genting Casinos*.

Allegation 4

"You failed to retain your diary for years 2018-2019 for the 5 year period required at a minimum by Lancashire County Council."

109. The panel has carefully considered the evidence in relation to the allegation that Mrs Richardson failed to retain her diary for the years 2018-2019 for the five-year period required by Lancashire County Council. The panel finds that this allegation is proved on the balance of probabilities.
110. The panel had evidence from SS that she asked Mrs Richardson to bring in her diary, as it was suggested that it might assist in demonstrating the visits to which the mileage claims she had made related. SS allowed Mrs Richardson significant opportunities to retrieve the diary, including permitting her to go home during a shift to collect it. The request was first made when SS had concerns about mileage claims from June and July 2019, prior to the wider concerns raised by SS in September 2019. The diary in question was therefore the one covering the period immediately before these concerns arose.
111. Despite multiple requests, Mrs Richardson did not bring in the diary for SS to review. Instead, she provided various explanations for its absence. Initially, she stated it was at her home. She later suggested it might be at her mother's address in her laptop bag, despite having her laptop with her at the time. Subsequently, she stated that she had placed the diary in confidential waste. When SS indicated that the key could be obtained to access the confidential waste, Mrs Richardson then stated that the waste had already been collected, making the diary irretrievable. The panel finds that these

shifting explanations lack credibility and indicate that Mrs Richardson had not retained her diary.

112. The evidence from SS and SR further corroborates this finding. SR's statement records that at a meeting on 7 October 2019, some months after SS had originally raised the issue, Mrs Richardson was still unable to confirm the whereabouts of her diary and concluded that she must have thrown it away. Mrs Richardson's own email to Social Work England, dated 11 September 2020 and contained on page 6 of her response bundle, explicitly states: "I maintain that my only failing was to adhere to the retention policy." The panel considers this to be an admission that she did not retain the diary as obligated to.
113. The panel has also considered whether there was a positive requirement or duty for Mrs Richardson to retain her diary, as the allegation is framed as a failure rather than a simple omission. The evidence establishes that such a duty existed as set out in LCCC policies and would be standard practice for social workers.
114. SR and SS both gave clear and consistent evidence that social workers were required to retain their diaries because they could be called to court at any time to assist in a case or to provide evidence for mileage or other claims.
115. SR described how she personally retained a stack of old diaries for this reason and stated that social workers would know not to discard them.
116. SS similarly confirmed that it was well understood within social work practice that diaries must be retained, and that this was reinforced during training.
117. The documentary evidence supports this position. SR produced an email from the council's records manager which confirms that the retention period for social workers' diaries is five years from the date of the last entry. This requirement is also set out in the council's data quality and records management policy, which SR produced as an exhibit. Although this policy is from 2022, SR confirmed in her evidence that it is identical in its terms to the policy in place during Mrs Richardson's employment.
118. SS's evidence further supports the existence of this retention requirement, and she referenced multiple policies and guidance documents indicating a consistent expectation that diaries should be retained. The panel is satisfied that the retention period was at least five years, if not longer.
119. Mrs Richardson's failure to retain her diary meant that when it was required to verify her claims from June and July 2019, it was no longer available. This is plainly not in accordance with the established retention requirements.
120. SR confirmed in her statement that Mrs Richardson would have known that she could not discard her diary as soon as she had finished using it. SS stated that Mrs Richardson would have been informed of this requirement both at the outset of her employment and during her training, which the panel has heard she also completed with Lancashire County Council.

121. The panel is satisfied that Social Work England has proved that Mrs Richardson failed to retain her diary for the period covering her claims in June and July 2019. The 2018-2019 diary should have been retained for at least five years in accordance with the council's policies.
122. Mrs Richardson's shifting explanations for its absence, the evidence of SS, SR, the council's retention policies, and Mrs Richardson's own admission in her email to Social Work England all support this finding.
123. Applying the standard of proof on the balance of probabilities, the panel is satisfied that the allegation 4 is proved.

Allegation 5

"On one or more of the dates identified in Schedule B, you requested and / or obtained payments from petty cash for service users without being able to provide sufficient receipts for this expenditure and / or without providing the cash to the service users."

124. The panel has carefully considered the evidence in relation to the allegation. The panel finds that this allegation is proved on the balance of probabilities.
125. The panel received clear and reliable evidence establishing that Mrs Richardson submitted requests for petty cash while working at Rochdale Council. These requests are evidenced in the payment request forms found in the exhibits bundle, where her name appears as the social worker requesting the funds. These forms show that various managers approved the requests, demonstrating that Mrs Richardson was responsible for ensuring that the funds were used appropriately. The panel notes that these requests correspond with the dates set out in Schedule B and that the documentary evidence alone establishes that she requested and obtained the petty cash payments.
126. CE provided consistent and credible evidence that, on 8 February 2021, a colleague, Miss Smith, queried one of Mrs Richardson's petty cash requests. This prompted Rochdale Council to obtain a full list of her petty cash claims from the business support department. CE's evidence was clear and measured, and she approached the situation with professional diligence. She explained that upon reviewing the list, she observed a higher number of claims than expected and, in response, took appropriate steps to investigate further. Her decision to conduct an inquiry was based on professional judgement and was not influenced by any bias against Mrs Richardson. CE also demonstrated fairness in how she handled the matter, providing Mrs Richardson with the opportunity to explain and substantiate her claims.
127. At a meeting on 2 March 2021, CE asked Mrs Richardson to provide receipts for the petty cash payments, as there were no records on the system to verify the expenditure. Mrs Richardson was unable to provide receipts. Although CE acknowledged that she

did not create a written record of the meeting at the time, she provided a transparent account of events and acknowledged in hindsight that a record would have been beneficial. Her evidence was further supported by the subsequent actions of Rochdale Council, including the investigation conducted by KW.

128. The panel considers that had Mrs Richardson been able to produce receipts at the meeting, there would have been no need for the council to proceed with a formal investigation. The necessity for further inquiry strongly indicates that Mrs Richardson did not provide receipts when requested.
129. KW conducted a detailed and methodical investigation into Mrs Richardson's petty cash claims. The panel found KW to be an objective and professional witness who took her investigative duties seriously. She thoroughly reviewed case records and contacted the families for whom Mrs Richardson had requested petty cash. Her findings are summarised in an exhibited table and further detailed in her statement.
130. KW documented her investigation in a structured and clear manner, ensuring that her conclusions were supported by verifiable evidence. She recorded that none of the families she contacted had received the petty cash that had been requested on their behalf. Some families recalled discussing financial assistance with Mrs Richardson, while others stated that they had never had such discussions. However, in all cases, the families confirmed that they had not received the funds.
131. The panel received direct and compelling evidence from Person 2, identified as an adult in Family 5 of the investigation. Person 2 provided oral evidence to the panel and presented a clear, consistent, and credible account of their interactions with Mrs Richardson. Their evidence was particularly persuasive as they were able to provide first-hand evidence regarding their specific experience. They stated unequivocally that they had never received the £75 that Mrs Richardson had claimed on their behalf. This was supported by emails seen by the panel, which confirm that Mrs Richardson had discussions with the council regarding this payment. Person 2 stated that they had to pay the fee themselves and received no cash for this from Social Services. The panel found Person 2's evidence to be credible and coherent in this regard. She gave a clear and coherent explanation for why the £75 was required, namely, to change a landline telephone number as a result of the telephone number being disclosed to the biological mother of the child she was caring for, and this was consistent with the emails showing Mrs Richardson claiming the money internally. Person 2's evidence is supported by the case records that show no record of £75 being paid over.
132. The panel also considered whether there were any case records or business support records to confirm that the petty cash payments had been received by the families.
133. KW conducted a thorough review of all relevant case files and found no record of the payments. She provided professional and experienced insight into the typical recording practices for financial assistance. She explained that, while it was possible for a family to request that financial assistance not be recorded in case notes, this would be highly unusual. In her experience, she had never encountered such a request.

134. Furthermore, even if a payment was not recorded in a child's case file, a separate record would still exist within business support, as receipts were required for all petty cash transactions. In this case, no receipts were found, and no records confirmed that the families received the funds. The absence of documentation in both case records and business support records further supports the conclusion that the payments were not provided to the service users.
135. The panel considered the petty cash process in place at Rochdale Council and whether Mrs Richardson was aware of the requirements. The evidence confirmed that all staff received training on the petty cash process as part of their induction and that Mrs Richardson would have been supported by colleagues and managers if she had any uncertainty regarding the procedure.
136. The evidence also established that £30 was the maximum amount a social worker could request without additional approval from the head of service. KW noted in her evidence that many of Mrs Richardson's claims were for exactly £30, which was unusual. It was rare for petty cash requests for direct work, such as buying food or emergency supplies for families, to come to exactly £30.
137. The panel considered that the repeated pattern of requests for the maximum permitted amount without additional approval suggested that Mrs Richardson may have been structuring her claims in a way designed to avoid scrutiny.
138. The panel noted that Mrs Richardson later returned some of the money; however, this does not alter its finding in respect of this allegation. The fact that funds may have been repaid later does not change the fact that, at the time of the claims, Mrs Richardson failed to provide receipts and did not pass the money on to the intended recipients. The allegation relates to her actions at the time the claims were made, and the panel is satisfied that those actions breached the expected standards of financial accountability.
139. The panel further considered whether Mrs Richardson's actions demonstrated an intention to withhold the money. The pattern of repeated claims, the absence of records, and the clear evidence that the families did not receive the funds all support the conclusion that the money was not disbursed as intended.
140. The panel finds that the evidence presented by CE, KW, and Person 2 was clear, consistent, and credible. Each witness provided professional and impartial evidence, demonstrating diligence in their respective roles. Their accounts were supported by contemporaneous documentation and thorough investigative processes. The panel finds no reason to doubt their reliability and considers that their evidence forms a strong and persuasive foundation for its conclusions.
141. The panel is satisfied that Mrs Richardson requested and obtained petty cash payments without providing sufficient receipts and without providing the cash to the service users. The evidence from the payment request forms, the council's investigation, the case records, and the direct evidence from person 2 all support this finding. Applying

the standard of proof on the balance of probabilities, the panel is satisfied that allegation 5 is proved.

Dishonest conduct in allegation 5

142. The panel carefully considered whether Mrs Richardson's conduct in requesting and obtaining payments from petty cash for service users, without being able to provide sufficient receipts for the expenditure and without providing the cash to the service users, was dishonest.
143. In determining dishonesty, the panel applies the two-stage test established in *Ivey v Genting Casinos* [2017] UKSC 67. The first stage requires an assessment of Mrs Richardson's actual state of knowledge or belief at the time she made the claims. The second stage requires the panel to determine whether, in light of that knowledge or belief, her conduct would be regarded as dishonest by the standards of ordinary, decent people.
144. The evidence before the panel establishes that Mrs Richardson personally submitted the petty cash claims in question. The request forms found in the exhibits bundle confirm that she requested funds on several occasions, and her name appears as the social worker responsible for the requests. The process for obtaining petty cash required Mrs Richardson to submit a request, which was then approved by a manager before the funds were released. There is no evidence to suggest that any other individual made these claims on her behalf or that they were submitted in error. Mrs Richardson's account in her responses has been to accept that petty cash claims were made by her and cash received by her, that the claims were not false, and, she has stated that not all the money was used for the families, but that unspent money was kept by her until after she was challenged and subsequently handed back an amount of money. The panel has seen a written receipt for £440 pounds being returned by Mrs Richardson.
145. The panel considered whether Mrs Richardson knew, at the time of submission, that she was making improper requests for petty cash. The evidence strongly supports the conclusion that she did. First, the requests follow a clear pattern, with almost all being for exactly £30—the maximum amount she could obtain without additional approval from senior management. This is highly unusual, as the types of expenditures for which petty cash was typically used, such as food, emergency supplies, or travel expenses, would not regularly total exactly £30.
146. KW, who conducted the council's investigation, gave credible and professional evidence that it was rare for requests to match the threshold in this manner.
147. The panel finds that this pattern of behaviour demonstrates that Mrs Richardson was structuring her petty cash claims to avoid the scrutiny of a more senior manager.

148. Further, CE provided clear and reliable evidence that, when concerns arose about the volume of Mrs Richardson's claims, she was asked to provide receipts to substantiate the expenditure. Despite being given the opportunity to do so, she failed to provide receipts for most of her claims. If the expenses had been legitimate, the expectation would be that receipts would have been retained and produced upon request. The fact that Mrs Richardson was unable to do so suggests that she knew that the claims were not supported by genuine transactions.
149. The panel also considered whether Mrs Richardson knowingly failed to pass the cash to the intended service users. The evidence from the families, gathered as part of the investigation conducted by KW, was clear and consistent. None of the families interviewed confirmed receiving the funds, despite Mrs Richardson having submitted claims on their behalf. The panel heard direct evidence from Person 2, who gave a credible and reliable account of their interactions with Mrs Richardson.
150. They stated unequivocally that they did not receive the £75 that Mrs Richardson claimed on their behalf. This was further supported by email correspondence, which demonstrated that Mrs Richardson had misrepresented the reason the payment was not made. This contradiction in her explanation provides further evidence that she knowingly withheld the funds.
151. The panel also noted that Mrs Richardson later returned some of the petty cash. However, this does not alter its finding that she was aware at the time of submission that the claims were not genuine. The return of funds occurred only after concerns had been raised and an investigation had commenced. The evidence of CE was that had petty cash been received for a family but had then not been needed, unspent cash should be returned to the office without delay and Mrs Richardson's response that she had held on to unspent petty cash was a concern. The panel finds that the timing of the £440 repayment by Mrs Richardson suggests that this was in response to scrutiny, rather than as part of an honest course of conduct.
152. Having established that Mrs Richardson knew the claims were improper, the panel assessed whether her conduct was dishonest by the standards of ordinary, decent people. The panel found that her conduct in relation to the petty cash was dishonest. The submission of false petty cash claims, structured in a way to avoid managerial oversight, and the failure to provide receipts or distribute the funds to service users, constitutes a clear breach of financial honesty. The evidence establishes that these were not isolated incidents but a pattern of behaviour over time. This was not a case of an occasional administrative oversight or a misunderstanding of policy; rather, the evidence demonstrates a sustained course of conduct in which funds intended for vulnerable service users were improperly claimed and withheld by Mrs Richardson. In these circumstances, the panel found that the ordinary decent person would regard such conduct as dishonest.
153. Ordinary decent people would consider it dishonest to request and obtain money under false pretences, particularly when those funds were allocated to assist families in

need. The fact that Mrs Richardson was in a position of trust as a social worker further compounds the seriousness of her actions. As a professional responsible for safeguarding and supporting vulnerable individuals, she was expected to act with honesty. Her actions not only breached financial protocols but also represented a significant abuse of trust.

154. The panel rejects any suggestion that Mrs Richardson may have misunderstood the petty cash process or been unaware of the need to provide receipts. The evidence establishes that she was trained on the proper procedures, and her pattern of claims suggests a deliberate attempt to circumvent scrutiny. Additionally, the failure to provide the funds to the families, coupled with her later attempt to return the money once concerns were raised, indicates an awareness that the claims were not legitimate.
155. Having considered all the evidence, the panel is satisfied that Mrs Richardson's conduct meets the legal test for dishonesty.
156. Applying the objective standard, the panel finds that her actions would be regarded as dishonest by ordinary, decent people.
157. Accordingly, the panel finds that Mrs Richardson conduct was dishonest as alleged in allegation 5 as alleged in allegation 11.

Allegation 6

"You did not complete statutory and/or non-statutory visits as required, and/or you failed to keep accurate and up to date case recordings in respect of;

Service User A

Service User B

Service User C and/or Service User D"

158. The examination of the witnesses in this case reveals a consistent pattern of evidence that substantiates the allegations against Mrs Richardson. Each witness provided credible and reliable accounts regarding her failures to conduct required visits and maintain accurate case recordings for Service Users A, B, C, and D.
159. In assessing the allegations, the panel applied the civil burden and standard of proof, which requires that the evidence presented must demonstrate that it is more likely than not that the allegations are true.
160. Person 2 provided compelling evidence regarding Service User A. They stated unequivocally that Mrs Richardson did not attend the required visits. This account was marked by clarity and emotional depth, reflecting a genuine concern for the child's welfare. Person 2's strong reaction when giving oral evidence to the panel upon learning of entries in the case records concerning Service User A for whom she cared, and which she regarded as inaccurate spoke to Person 2's integrity and the credibility of her evidence alongside the documentary evidence, including emails, that corroborated her

evidence. Her intimate knowledge of the family dynamics and the support they were receiving, or not receiving, adds weight to the evidence. The panel can reasonably conclude that Person 2 is a credible and reliable witness whose evidence is consistent and thorough, making their observations crucial in assessing Mrs Richardson's conduct.

161. LW, the head teacher, also provided significant evidence regarding Service User A. She confirmed that Mrs Richardson never conducted visits at the school, reinforcing the notion that Mrs Richardson's engagement with the service user was non-existent. Her evidence was consistent with the contemporaneous emails, seen by the panel, between the school and Mrs Richardson that demonstrated a proactive effort by the school to facilitate communication, support and to chase-up arrangements for the overdue Child In Need meeting. LW's status as a professional in the educational field lends additional credibility to her observations. Her honesty and clarity in recounting the events indicate a commitment to ensuring that children's needs are met. Therefore, her evidence can be deemed reliable and thorough, providing essential corroboration of Person 2's claims.
162. Person 1 offered detailed and consistent evidence regarding Service User B. He recounted their interactions with Mrs Richardson, indicating that aside from an initial handover visit in October 2020, and a brief visit in December 2020, she did not conduct further visits. Person 1's account was supported by contemporaneous notes he had kept, which chronicled his attempts to engage Mrs Richardson for ongoing support. This contemporaneous record-keeping underscores his reliability as a witness. Furthermore, his direct involvement in the case provides a credible basis for his statements. The panel view's Person 1 as an honest, credible and reliable witness, whose evidence supports the allegations made against Mrs Richardson.
163. KW, who provided evidence regarding both Service Users C and D, also contributed valuable insights. She reported her conversation with the mother of these children, who stated that Mrs Richardson had not visited. While this evidence is hearsay, it was documented in the context of a professional audit, lending it credibility. KW's role as a manager within the team adds further weight to her account, as she has a professional obligation to ensure that records are accurate and that children receive the necessary support. Her evidence, while less direct than that of the other witnesses, still supports the overarching narrative of Mrs Richardson's neglect of duty. The panel can regard KW as a reliable witness whose evidence, although in part hearsay evidence, is grounded in her professional context and responsibilities.
164. In summary, each witness in this case namely Person 1, LW, Person 2 and KW, provided consistent, reliable, and thorough evidence that substantiates the allegations against Mrs Richardson that she did not conduct statutory and non-statutory visits as required as part of her professional duties. After careful consideration of all the evidence and applying the civil burden and standard of proof, the panel found the allegation 6 against Mrs Richardson to be proved.

165. Insofar as the case records show visits were made by Mrs Richardson, the panel concludes that these are false given that she did not make the required visits and therefore inaccurate. The panel was concerned that case records of visits contained details that might only have come from making such visits. The panel questioned witnesses about this. The evidence of witnesses, in particular Person 1 and Person 2, was that the details in the case records could have come from other sources, such as the child's school, and also from earlier case records accurately recorded by the previous Social Worker who did undertake visits to the families, or the details were otherwise inaccurate. The panel accepted the evidence of the witnesses in this regard and concluded that the details in the case records did not undermine the overall evidence of visits not being undertaken and inaccuracy of the records of fabricated visits being recorded.
166. Accordingly, the panel found allegation 6 proved in its entirety.

Dishonest conduct in allegation 6

167. To assess whether Mrs Richardson's conduct was dishonest, the panel applies the two-stage test established in *Ivey v. Genting Casinos (UK) Ltd.*, beginning with a subjective assessment followed by an objective evaluation. Additionally, the panel applies the civil standard of proof, namely the balance of probabilities, which requires a determination of whether it is more likely than not that Mrs Richardson acted dishonestly.
168. The first stage requires the panel to determine Mrs Richardson's awareness of her conduct and whether she understood it to be dishonest. The evidence indicates that she was fully cognisant of her professional responsibilities as a social worker. Evidence from multiple sources, including Person 2, LW, and Person 1, establishes that she failed to conduct the required statutory and non-statutory visits for Service Users A, B, C, and D. Instead of fulfilling these obligations, she created falsified records that inaccurately documented visits that had not taken place.
169. The deliberate creation of misleading records strongly suggests that Mrs Richardson understood her actions to be deceptive. A social worker in her position would be fully aware that failing to document visits accurately and misrepresenting professional duties constitutes dishonest behaviour.
170. The panel finds, on the balance of probabilities, that it is more likely than not that Mrs Richardson recognised the dishonesty of her actions.
171. The second stage of the test requires an assessment of whether her conduct would be regarded as dishonest by the standards of ordinary decent people.
172. The role of a social worker carries significant responsibilities, including conducting visits to safeguard children and maintaining accurate records. The failure to perform these visits, coupled with the intentional falsification of records, demonstrates a clear intent to mislead both colleagues and the families involved.

173. Ordinary decent people would expect a social worker to adhere to ethical standards and to be transparent in their professional obligations. The panel was satisfied that her conduct would be considered dishonest by ordinary decent people.
174. The panel is satisfied that Mrs Richardson's conduct was dishonest. The panel therefore determines that the conduct in allegation 6 was dishonest as alleged in allegation 11.

Allegation 7

"You submitted a section 7 report to court, dated 22 January 2021, which contained inaccurate information, in that:

7.1 You reported that Service User A stuck his fingers in his eyes until they bled which was untrue;

7.2 You referred to visiting Service User A and Person 2, when you had not."

175. The allegation concerns the accuracy of a Section 7 court report written by Mrs Richardson dated 22 January 2021, in which it was claimed that Service User A stuck his fingers in his eyes until they bled, and that Mrs Richardson visited Service User A and Person 2. Having considered the evidence presented regarding the allegation against Mrs Richardson, the panel has reached the decision that allegation 7 has been proved on balance of probabilities.
176. Person 2 provided both written and oral evidence, in which she categorically denied that Service User A had ever engaged in the self-inflicted injury described in the Section 7 report. Her evidence was consistent throughout, and she demonstrated a clear understanding of Service User A's history and behaviour. Given her close familial relationship and ongoing involvement in Service User A's care, her evidence was deemed credible and persuasive. There were no contradictions or inconsistencies in her statements, the panel conclude that, on the balance of probabilities, the claim in the court report was inaccurate as regards the suggestion that Service User A caused his eyes to bleed.
177. The panel has already found that Mrs Richardson did not make the appropriate visits to Service User A and Person 2 at their home and, insofar as her Section 7 court report dated 22 January 2021 asserts that visits were undertaken, the court report is inaccurate.
178. Person 2 gave evidence that to prepare for the court hearing she asked Mrs Richardson for a copy of the Section 7 court report prior to the court hearing, but despite repeated requests Mrs Richardson only provided the report to her the evening before the court hearing. This account is corroborated by contemporaneous social media messages seen by the panel between Person 2 and Mrs Richardson and also another member of staff at Social Services. Person 2 was asked by the panel what happened at court the

next day. Person 2's evidence was that she attended court, Mrs Richardson did not (which the panel understands may have been normal and the panel places no significance on her absence from the court hearing), and that she told the court of the inaccuracies in the court report. Person 2's account went on to describe that as a result of her concerns expressed to the court, the hearing was adjourned for a new Section 7 court report to be prepared. Person 2 went on to describe how the adjournment and resulting delay had a negative impact on Service User A. The panel regarded Person 2's evidence, as set out above, as a credible and reliable account that further evidenced the finding that the court report prepared by Mrs Richardson contained inaccuracies as alleged.

179. Accordingly, the panel determines that the allegation 7 against Mrs Richardson is proved.

Dishonest conduct in allegation 7

180. The panel has carefully considered the evidence in relation to Mrs Richardson's conduct and the inaccuracy of her Section 7 court report in allegation 7. In determining whether her actions amounted to dishonesty, the panel has applied the two-stage test established in *Ivey v Genting Casinos*.
181. The first stage of the test requires an assessment of Mrs Richardson's actual knowledge and belief regarding the facts at the relevant time.
182. Mrs Richardson would have been fully aware that she had not made the visits to Service User A and Person 2's home. The panel considers that her position as a professional with responsibilities for accurate record-keeping means she would have known that her court reports misrepresented the actual circumstances. There is no plausible explanation for these inaccuracies that could suggest an innocent mistake or misunderstanding.
183. The second stage of the test requires the panel to consider, applying the standards of ordinary decent people, whether Mrs Richardson's conduct was dishonest.
184. The panel is satisfied that a reasonable and honest individual would regard the deliberate misrepresentation of visits in an official court report as dishonest. Social workers have a fundamental duty to maintain accurate and truthful records, given the serious implications their reports can have on judicial decisions and the welfare of children. The fabricated visits created a misleading impression regarding Service User A's supervision and support, which could have had significant consequences.
185. The weight of the corroborated evidence leads the panel to conclude that Mrs Richardson knowingly provided false information in her reports and that this was not an error but a deliberate misrepresentation. An ordinary honest person would regard this as dishonest.

186. The panel has also considered whether any alternative explanation or mitigating factors exist that could alter this conclusion. Mrs Richardson has not provided any credible evidence or justification that would suggest she genuinely believed the visits had taken place or that the inaccuracies were the result of an innocent error. The persistent pattern of discrepancies across multiple records further undermines any suggestion that this was a mistake. The nature and extent of the inaccuracies demonstrate a repeated and deliberate falsification of records rather than an isolated incident.
187. Having applied the legal test, the panel finds that Mrs Richardson's conduct was dishonest. Her actions involved a clear and intentional misrepresentation of facts within an official capacity, which a reasonable and honest person would consider to be dishonest.
188. Accordingly, the panel finds that Mrs Richardson's conduct set out in allegation 7 (namely the inaccurate court report) to have been dishonest as alleged in allegation 11.

Allegation 8

"You failed to declare to your recruitment agency Social Personnel that you were subject to disciplinary investigation and / or a fitness to practise investigation."

189. The panel has carefully considered the evidence before it in relation to the allegation that Mrs Richardson failed to declare to her recruitment agency, Social Personnel, that she was subject to disciplinary investigation and/or a fitness to practise investigation. The assessment of this allegation has been made on the balance of probabilities, considering both documentary and witness evidence.
190. Mrs Richardson's registration form with Social Personnel, dated 18 September 2020, contains direct questions regarding disciplinary proceedings and fitness to practise investigations. She answered "no" to both questions, thereby indicating that she was not aware of any such proceedings against her at that time. However, a review of the timeline of events and available documentary evidence contradicts these responses.
191. At the time of completing her registration form, Mrs Richardson had previously been suspended by Lancashire County Council in September 2019 and had been subject to an internal disciplinary process which culminated in a final disciplinary meeting on 24 January 2020, followed by an addendum report dated 6 February 2020. Furthermore, she had been referred to the Health and Care Professions Council (HCPC) in September 2019, both by herself and Lancashire County Council. When HCPC's regulatory function transferred to Social Work England in December 2019, her case remained under investigation.
192. Mrs Richardson was in direct contact with Social Work England between 9 and 11 September 2020, just days before completing her registration form. During this exchange, she sought an update on the status of her investigation, which confirms that

she was fully aware that the investigation remained ongoing. Despite this, she did not disclose it on her registration form.

193. LR gave oral evidence to the panel. She was the Regional Manager for the agency, Social Personnel, that found work placements for social workers and who had direct dealings with Mrs Richardson. She confirmed that Mrs Richardson had not informed Social Personnel of any disciplinary or regulatory proceedings at the time of her registration. She stated that if such a disclosure had been made, it would have been recorded. The first instance when Mrs Richardson made any reference to an ongoing fitness to practise investigation was in an email from Mrs Richardson dated 11 February 2021 to Social Work England, which was copied to LR.
194. Following this email, LR attempted to obtain further clarification from Mrs Richardson; LR's evidence was that in response, Mrs Richardson was evasive, providing no substantive information.
195. Further corroboration comes from the contemporaneous evidence of JK, who was the Social Work England investigator, and CG, a senior figure at Social Personnel. CG confirmed in his email correspondence to JK that Social Personnel had no knowledge of Mrs Richardson's regulatory proceedings until after it had come to light in February 2021. His statement explicitly states that there was no verbal or written disclosure of any investigation at the time of her registration or in the months that followed.
196. The panel notes Mrs Richardson's assertion that she had verbally disclosed the investigation at an earlier stage, but this claim is not supported by any reliable evidence. Neither LR nor CG, both of whom were able to receive such a disclosure, have any record of it.
197. Mrs Richardson's claims are further undermined by the fact that her signed registration form contains categorical denials of any disciplinary or regulatory proceedings. Had she disclosed this information verbally, it would have been inconsistent with the written declarations she had made.
198. The weight of the evidence proves that Mrs Richardson knowingly failed to disclose her disciplinary history and ongoing fitness to practise investigation when completing her registration with Social Personnel. The registration process was an important safeguarding measure, and the questions posed in the form were material to ensuring transparency and suitability for employment in the sector. Mrs Richardson was under a professional duty to give accurate and comprehensive information when registering with the agency. Providing incorrect responses, particularly in the context of a profession that involves safeguarding vulnerable individuals, amounts to a failure to disclosed as alleged.
199. Considering this, allegation 8 is found proved.

Dishonest conduct in allegation 8

200. In considering whether Mrs Richardson's actions were dishonest in allegation 8 the panel has applied the test set out in *Ivey v Genting Casinos (UK) Ltd* [2017] UKSC 67.
201. Applying the first stage of the Ivey test, which requires an assessment of Mrs Richardson's actual knowledge and belief as to the facts, the panel finds that she knew she was under investigation and will have known that her responses on the registration form were false. Given her recent communications with Social Work England and her history of disciplinary proceedings, there is no plausible explanation for why she would have mistakenly believed that had not been subject to a disciplinary investigation and that she was at that time subject to an investigation by her regulator.
202. Having concluded that Mrs Richardson knowingly failed to provide accurate information about her disciplinary and regulatory history in the agency registration forms, the panel also finds that she did so deliberately and dishonestly in order to gain employment through the agency as a social worker. In email exchanges between Mrs Richardson and Social Work England between 9 – 11 September 2020, Social Work England made clear the regulatory investigation was continuing. In an email dated 11 September 2020, just a week before completing the agency registration forms, Mrs Richardson wrote to Social Work England in the following terms:
- "However, upon any successful job offer it is then being withdrawn as there is a pending investigation, therefor leaving me Unemployable, causing financial hardship and anxiety within myself"*
203. The panel concludes from this that Mrs Richardson's failure to disclose her disciplinary and regulatory history was deliberate in order to secure work as a Social Worker through the agency.
204. The second stage of the Ivey test requires an objective assessment of whether, by the standards of ordinary, decent people, Mrs Richardson's actions were dishonest. The panel found that a reasonable person would consider it dishonest to knowingly and deliberately provide false information on a professional registration form, particularly in a sector that relies on transparency and its role to safeguard vulnerable people. The requirement to declare regulatory and disciplinary matters is a fundamental tenet of the social work profession. The panel is satisfied that the ordinary decent person would regard her conduct in this respect as dishonest and undertaken with a financial motive.
205. Therefore, the panel concludes her conduct in allegation 8 was dishonest as alleged in allegation 11.

Allegation 9

"On 8 March 2021, you did not advise your recruitment agency, Social Personnel, of the full reasons for your placement at Rochdale Council being terminated."

206. The panel has carefully considered all the available evidence in relation to whether Mrs Richardson fully disclosed to Social Personnel the reasons for the termination of her placement at Rochdale. The panel has assessed the evidence in accordance with the civil standard of proof, namely the balance of probabilities, which requires a determination of whether it is more likely than not that Mrs Richardson failed to provide a full account of the circumstances leading to the termination of her placement.
207. The evidence clearly establishes that Mrs Richardson provided an explanation to Social Personnel that was incomplete and misleading. In her email to LR on 8 March 2021, she stated that her contract at Rochdale had ended *“due to documentation not being up to date on the system”*.
208. However, the panel has considered the evidence provided by CE and KW, which indicates that the initial and primary concerns at Rochdale related to petty cash claims, though concerns about visits and record keeping emerged after the petty cash investigation started. These concerns were serious enough to result in the termination of Mrs Richardson’s placement. In contrast, the issue of *“documentation”*, namely the accurate keeping of case records and visits, was a secondary matter and not the primary reason for her dismissal.
209. This version of events is further supported by CG, who confirmed in his correspondence with Social Work England that Social Personnel was informed of the concerns regarding Mrs Richardson’s handling of petty cash and her inability to provide receipts. This information was relayed by the account manager during Social Personnel’s inquiries about the termination and not communicated by Mrs Richardson to Social Personnel.
210. The panel has carefully considered whether Mrs Richardson’s conduct was deliberate or inadvertent in not fully disclosing the reasons for her termination at Rochdale Council. Given that the concerns relating to petty cash were the central issue leading to her termination, it is highly improbable that she was unaware of their significance. Her email of 8 March 2021 provides a materially incomplete explanation and omits crucial information about the nature of the concerns that led to the end of her placement. This omission is significant because it had the potential to mislead Social Personnel about the circumstances surrounding her departure from Rochdale.
211. Furthermore, the panel notes that Social Personnel relied on the information provided by candidates when assessing their suitability for roles. Transparency in these disclosures is essential, particularly in a profession where trust is of paramount importance. By failing to mention the petty cash concerns, Mrs Richardson deprived Social Personnel of the opportunity to make a fully informed decision about her placement and suitability for future roles. The panel dismissed the possibility that Mrs Richardson was referring the absence of petty cash receipts when she referred to *“documentation”* issues.
212. Taking all the evidence into account, the panel is satisfied that, on the balance of probabilities, Mrs Richardson knowingly failed to disclose the full reasons for the termination of her placement at Rochdale. The available evidence overwhelmingly

supports the conclusion that she provided an incomplete and misleading explanation, and that Social Personnel only became aware of the true circumstances through external inquiries rather than through Mrs Richardson herself.

213. Considering these findings, the panel determines that the allegation 9 on the balance of probabilities is found proved.

Dishonest conduct in allegation 9

214. Applying the two-stage test set out in *Ivey v Genting Casinos*, the panel first considers Mrs Richardson's actual state of knowledge and belief as to the facts. The evidence suggests that Mrs Richardson was fully aware that the concerns regarding petty cash were the primary reason for her termination.
215. She had been informed of these concerns and was given the opportunity to respond to them.
216. Furthermore, the evidence establishes that she actively communicated with Social Personnel about the reasons for her termination but chose to omit any mention of the petty cash concerns. This suggests a conscious decision to withhold relevant information rather than an oversight or misunderstanding.
217. The second stage of the *Ivey* test requires the panel to determine whether, based on the objective standards of ordinary decent people, Mrs Richardson's conduct was dishonest.
218. The panel finds that ordinary decent people would consider it dishonest to provide a materially incomplete account of the reasons for termination, particularly when the omitted information pertained to financial concerns that were central to her role. By failing to disclose the true reasons for the termination of her placement, Mrs Richardson presented a misleading account that concealed information relevant to her professional suitability.
219. Applying the principles in *Ivey v Genting Casinos*, the panel finds that Mrs Richardson's conduct in not disclosing the full reasons for her termination as proved in allegation 9 was dishonest as alleged in allegation 11.

Allegation 10

"You did not self-refer the concerns raised by Rochdale Council to Social Work England."

220. The panel has carefully considered all the available evidence in relation to whether Mrs Richardson made a self-referral to Social Work England regarding the concerns that arose during her placement at Rochdale. The panel has assessed the evidence in accordance with the civil standard of proof, namely the balance of probabilities, which

requires a determination of whether it is more likely than not that Mrs Richardson did not make such a referral.

221. The panel has reviewed the evidence provided by JK, the investigator at Social Work England, and finds it to be highly persuasive. In her statement, JK makes clear that Social Work England has no record of any self-referral from Mrs Richardson in relation to the Rochdale concerns. The panel notes that JK has conducted extensive checks on Social Work England's records and has provided a substantial number of documents related to this case. These records support her conclusion that there is no evidence of a self-referral. The absence of such a record is a strong indication that no referral was made.
222. The credibility and reliability of JK's evidence have been carefully considered by the panel. JK is an investigator acting in an official capacity for Social Work England, and her evidence is supported by documentary records. There is no indication that she has any personal or professional interest in the outcome of this case that might affect her impartiality.
223. Furthermore, the thoroughness of her investigation, as evidenced by the volume of documentation she reviewed and provided, lends significant weight to her conclusions. The panel finds no reason to doubt the accuracy or reliability of her testimony. Her evidence is clear, consistent, and based on a systematic review of Social Work England's records, which makes it highly credible and reliable.
224. Mrs Richardson has not asserted that she made a self-referral. In her response, she suggests that she was told by Social Personnel that they would make a referral on her behalf. However, this assertion is disputed by LR, who provided both written and oral evidence confirming that Mrs Richardson was given no such assurance. LR stated that Social Personnel did not believe they needed to make a referral as they knew Social Work England was already aware of the Rochdale Council situation. She was unequivocal in her evidence that Mrs Richardson was not told that Social Personnel would make a referral on her behalf.
225. The panel has considered whether Mrs Richardson's explanation is a credible reason for her failure to self-refer. Even if Mrs Richardson believed that Social Personnel would make a referral, this does not equate to her having made one herself.
226. Having reviewed all the evidence, the panel is satisfied, on the balance of probabilities, that Mrs Richardson did not self-refer the Rochdale concerns to Social Work England. JK's investigation, which uncovered no record of a self-referral, is strong and credible evidence. Additionally, Mrs Richardson has not claimed that she made a referral, and her explanation that she believed Social Personnel would do so is not supported by the evidence. Taking all these factors into account, the panel is satisfied that the allegation 10 is proved.

Dishonest conduct in allegation 10

227. The panel has carefully considered whether Mrs Richardson conduct in not self-referring the Rochdale concerns to Social Work England constitutes dishonest conduct.
228. In making this determination, the panel applies the legal test for dishonesty as established in *Ivey v Genting Casinos* [2017] UKSC 67. This test requires a two-stage approach: first, to establish Mrs Richardson's actual knowledge or belief about the facts, and second, to determine whether her conduct was dishonest by the standards of ordinary decent people.
229. The evidence confirms that Mrs Richardson was aware of the concerns raised about her practice during her placement at Rochdale. The nature of these concerns was significant enough to warrant professional scrutiny, and it is highly improbable that she did not recognise the potential consequences of these concerns being investigated by Social Work England.
230. Mrs Richardson has asserted that she believed Social Personnel would make a referral on her behalf. However, this assertion is not supported by the evidence. LR, in both her written and oral testimony, has made it clear that no such assurance was given. Social Personnel did not consider themselves responsible for making a referral, and there is no record of any indication that they assumed this responsibility.
231. Having established Mrs Richardson's knowledge, the panel must now determine whether her conduct was dishonest by the standards of ordinary decent people.
232. Social workers are held to high professional standards, which include an expectation of transparency and accountability. It is reasonable to expect that a social worker, faced with serious concerns about their practice, would take personal responsibility for ensuring that regulatory bodies are properly informed.
233. Mrs Richardson's conduct in not self-referring was not, the panel concludes, merely an oversight; rather, she appears to have knowingly omitted to act in circumstances where she was aware of the potential professional implications. By not self-referring and later suggesting that she believed Social Personnel would do so, she misrepresented the situation.
234. An ordinary, decent person would consider it dishonest for a registered professional to knowingly not disclose relevant concerns to their regulator, particularly where there is an expectation of self-reporting. The fact that Mrs Richardson may have assumed, without confirmation, that Social Personnel would make the referral does not absolve her of personal responsibility.
235. Applying the *Ivey v Genting* test, the panel is satisfied that Mrs Richardson's conduct in not self-referring was dishonest. She knew that she had not personally made a referral and had no confirmation that anyone else had done so on her behalf. By not acting and later providing an unsupported explanation for her inaction, she acted in a manner that ordinary, decent people would consider dishonest. On the balance of probabilities, the

panel finds that Mrs Richardson's conduct in allegation 10 was dishonest as alleged in allegation 11.

Allegation 11

"Your conduct at paragraphs 5 and / or 6 and / or 7 and / or 8 and / or 9 and / or 10 was dishonest."

236. The panel considered and made findings relating to dishonesty, as alleged in Allegation 11, when considering each of the relevant allegations (Allegations 5, 6, 7, 8, 9 and, 10) above.
237. The panel found Mrs Richardson's conduct to have been dishonest in each instance.

Character references:

238. The panel also reviewed character references submitted by Mrs Richardson. However, these references were generic in nature, appeared to have been written for the purposes of job applications, and did not demonstrate an awareness of, or address, the specific allegations against her. Consequently, their evidential value was limited, and they were afforded little-to-no weight in the panel's deliberations, particularly when considering the issue of honesty.

Adverse Inferences:

239. Ms Steels invited the panel to make findings that the facts were proved on the basis of the evidence presented and by drawing an adverse inference from Mrs Richardson's absence from the hearing.
240. The panel was satisfied that it would make appropriate findings of fact against Mrs Richardson based on the evidence presented to it, including taking into account responses by Mrs Richardson in the documents available. The panel did not rely on making an adverse inference based on her absence.
241. In the light of the panel's findings, the hearing continued to consider the next stage, namely whether the ground of misconduct and whether Mrs Richardson's fitness to practise is impaired as alleged.

Resumed final hearing:

242. The panel reconvened on Monday 21 July 2025.

243. The hearing officer was Mr A Brown. The hearing support officer was Ms R Wade.
244. The legal adviser was Ms Z Huma.
245. Social Work England was represented by Ms Steels.
246. Mrs Richardson did not attend the hearing and was not represented.
247. The panel was informed by Ms Steels that notice of this hearing was sent to Mrs Richardson by email and Royal Mail to an address provided by the social worker namely their registered email and postal address as it appears on the Social Work England register. Ms Steels submitted that the notice of this hearing had been duly served.
248. The panel had careful regard to the documents contained in the resumed final hearing service bundle as follows:
- A copy of the notice of the final hearing dated 20 February 2025 and addressed to Mrs Richardson at their email and postal address which they provided to Social Work England;
 - An extract from the Social Work England Register as of 20 February 2025 detailing Mrs Richardson's registered email and postal addresses;
 - A signed statement of service, provided on behalf of Social Work England, confirms that on 20 February 2025, the notice of hearing and related documents were sent to Mrs Richardson by both email and post to the addresses set out above.
249. The panel noted that while an earlier email sent by Social Work England on 20 February 2025 was undelivered, a subsequent email sent by the hearing team at Social Work England was successfully delivered to Mrs Richardson's registered email address on 13 March 2025. This confirmed that Mrs Richardson had been successfully contacted regarding the relevant matter at that later date. In any event, the Notice of Hearing had also been sent by post.
250. The panel accepted the advice of the legal adviser in relation to service of notice.
251. Having had regard to Rules 14 and 15 of the Fitness to Practise Rules 2019 (as amended) ("the 2019 Rules") and 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 Mrs Richardson in accordance with Rules 44 and 45 of the 2019 Rules relying on the evidence of the Notice having been sent, including sent by email and post to Mrs Richardson's registered email and postal address.

Preliminary matters:

Application to proceed in absence:

252. Ms Steels made submissions on behalf of Social Work England, inviting the panel to proceed in Mrs Richardson's absence. She submitted that all reasonable efforts had been made to serve the notice of the hearing. Ms Steels highlighted that while an earlier email was undelivered on 20 February 2025, a subsequent email was successfully delivered to Mrs Richardson's registered email address on 13 March 2025. Despite this, Mrs Richardson had not engaged with the hearing, had not responded to correspondence, and had not provided any explanation for her non-attendance.
253. Ms Steels submitted that there was nothing to suggest that Mrs Richardson wished to attend or that an adjournment would secure her future attendance. She reminded the panel that Mrs Richardson had a previous history of non-engagement with the regulatory process and that her failure to attend or respond appeared to be a voluntary decision to absent herself. In those circumstances, Ms Steels submitted that it was in the public interest for the hearing to proceed in her absence, in order to ensure the fair, effective, and timely disposal of the case. She referred the panel to the principles in *R v Jones* [2003] and *GMC v Adeogba* [2016], emphasising the importance of upholding public confidence in the regulatory process.
254. The panel heard and accepted the advice of the legal adviser on the issue of proceeding in Mrs Richardson's absence. The legal adviser referred the panel to the legal principles set out in *R v Jones* and *GMC v Adeogba*, confirming that the panel has the discretion to proceed in absence but must exercise it with great care and caution. The panel was advised to consider whether all reasonable steps had been taken to notify Mrs Richardson of the hearing, whether she had voluntarily waived her right to attend, whether there was a good reason for her absence, and whether a fair hearing could still take place.
255. The panel considered all the information before it and noted that, despite proper notification of the hearing, Mrs Richardson had not engaged with the process, had not provided any explanation for her absence, and had not requested an adjournment. In the absence of any good reason for her non-attendance, and having found that she had voluntarily absented herself from the proceedings, the panel concluded that it was fair and in the public interest to proceed. The panel noted the importance of the timely and effective disposal of regulatory cases in maintaining public confidence in the profession and in the regulator.
256. The panel therefore decided to proceed in the absence of Mrs Richardson.

Submissions and legal advice on grounds and impairment:

257. Ms Steels made submissions to the panel on behalf of Social Work England, submitting that the proven concerns against Mrs Richardson plainly amounted to serious misconduct. She referred the panel to the leading authorities of *Roylance v GMC* (No. 2) and *Rylands v GMC*, submitting that Mrs Richardson's conduct represented a significant departure from the standards expected of a registered social worker, and fell

far short of what would be considered proper in the circumstances. Ms Steels submitted that the facts found proved revealed repeated and dishonest breaches of core professional duties particularly in relation to honesty, record-keeping, safeguarding, and transparency.

258. Ms Steels drew the panel's attention to the breaches of the HCPC Standards of Conduct, Performance and Ethics in place at the time, including standard 9.1 (honesty and public trust) and standard 10 (record-keeping obligations). She also referred to Social Work England's current professional standards, highlighting breaches of standards 2.1, 2.7, 3.11, 5.2, 5.3, 6.6, and 6.7. Ms Steels submitted that Mrs Richardson's dishonest financial claims, failure to visit vulnerable service users, fabrication of records and court reports, and lack of honesty with both her agency and regulator represented a grave abuse of professional trust, causing actual harm and exposing service users to serious risk.
259. On impairment, Ms Steels submitted that Mrs Richardson's fitness to practise is currently impaired on both the personal and public components. She argued that all four limbs of the Grant test were clearly engaged: Mrs Richardson's conduct placed service users at risk of harm, brought the profession into disrepute, breached fundamental tenets of the profession, and was dishonest. She submitted that the misconduct was serious, prolonged, and deliberate, extending across multiple employment settings and involving a pattern of attitudinal failure.
260. In relation to the personal component, Ms Steels submitted that the misconduct had not been remedied. Mrs Richardson had shown no insight, had denied most of the concerns, and had deflected blame onto others. She had undertaken no remediation, shown no remorse, and provided character references which did not address the allegations. In these circumstances, Ms Steels submitted that there was a real and continuing risk of repetition.
261. Regarding the public component, Ms Steels submitted that the dishonesty and safeguarding failures in this case were so serious that a finding of impairment was necessary to maintain public confidence in the profession and to uphold professional standards. The public would rightly be shocked if no finding of impairment were made following misconduct of this nature and extent. Therefore, Ms Steels invited the panel to conclude that Mrs Richardson's fitness to practise is currently impaired.
262. The panel accepted the advice of the legal adviser. The legal adviser reminded the panel that its primary duty is the protection of the public, which includes not only the safety of service users but also the maintenance of public confidence in the social work profession and the upholding of proper professional standards.
263. In relation to misconduct, the legal adviser referred the panel to the case of *Roylance v GMC* (No. 2) and confirmed that misconduct involves a serious departure from the standards expected of a registered social worker, rather than simply any breach of professional guidance. The panel accepted the advice that the question of misconduct is a matter for its own independent judgment and that it should consider whether Mrs

Richardson's conduct was serious, reprehensible, and fell far below what would be expected by competent and responsible professionals. The legal adviser also drew attention to relevant authorities on dishonesty, including *Ghaffar*, and emphasised that dishonesty, particularly where repeated, concealed, or committed for personal gain, is always to be treated as a matter of particular seriousness.

264. Turning to impairment, the legal adviser advised that the panel should adopt a forward-looking approach, considering both the personal and public components of impairment. The panel was reminded of the guidance in *CHRE v NMC and Grant, Cohen v GMC*, and other relevant case law. The panel was reminded that impairment may arise from a failure to demonstrate insight, lack of remediation, and ongoing risk, and that these factors must be considered in light of the serious and wide-ranging findings the panel had already made.

The panel's decision on grounds:

265. The panel considered all of the information presented during the course of the hearing in determining whether the factual particulars found proved at allegations 1 to 11 amounted to misconduct. This included oral and written testimony from multiple witnesses, detailed audit documentation, internal records, case notes, emails, and Mrs Richardson's written responses to Social Work England. The panel evaluated each allegation individually and collectively, assessing the nature, gravity, frequency, and impact of the conduct, as well as the duties and expectations of a registered social worker.
266. The panel applied the legal principles from *Roylance v GMC (No. 2)* and *Rylands v GMC*, which require that misconduct must amount to a serious departure from the standards expected of a registered professional. The panel also had regard to the regulatory frameworks in place during the material period, including the HCPC Standards of Conduct, Performance and Ethics (2016) and the Social Work England Professional Standards, both of which set out the fundamental obligations of honesty, record-keeping, safeguarding, and accountability.
267. Taken individually and collectively, the panel was satisfied that the factual particulars found proved at allegations 1 to 11 amounted to serious misconduct. The panel was satisfied that these matters involved repeated and egregious breaches of the following:
268. HCPC Standards of Conduct, Performance and Ethics (2016):

“Standard 9 – Be honest and trustworthy

9.1: You must make sure that your conduct justifies the public's trust and confidence in you and your profession.

Standard 10 – Keep records of your work

10.1: You must keep full, clear and accurate records for everyone you care for, treat or provide other services to.

10.2: You must complete all records promptly and as soon as possible after providing care, treatment or other services.

10.3: You must keep records secure by protecting them from loss, damage or inappropriate access.

269. Social Work England Professional Standards (2019):

2.1: I will be open, honest, reliable and fair.

2.7: I will consider where conflicts of interest may arise, declare conflicts as early as possible and agree a course of action.

3.11: I will maintain clear, accurate, legible and up-to-date records, documenting how I arrive at my decisions.

5.2: I will not behave in a way that would bring into question my suitability to work as a social worker while at work or outside of work.

5.3: I will not falsify records or condone this by others.

6.6: I will declare to the appropriate authority and to Social Work England anything that might affect my ability to do my job competently or may affect my fitness to practise.

6.7: I will cooperate with any investigations by my employer, Social Work England, or another agency into my fitness to practise or the fitness to practise of others.”

270. The panel found that Mrs Richardson’s conduct demonstrated a sustained, deliberate, and wide-ranging pattern of dishonesty. The breaches were not isolated lapses or errors of judgment but reflected a systemic failure to uphold professional standards across multiple aspects of her role. Her behaviour was incompatible with the trust placed in her by employers, colleagues, courts, the public, and most importantly by the vulnerable children and families she was meant to support and protect.

271. The panel considered her dishonesty in relation to money both through false mileage claims and petty cash misuse to be especially serious. Social workers hold a position of public trust and are often responsible for handling funds intended to alleviate hardship for vulnerable families. By submitting fabricated mileage claims and misappropriating petty cash, Mrs Richardson not only misled her employer but actively diverted public money from those in genuine need. Such conduct represents an abuse of her professional position and a betrayal of the public’s expectation that social workers will act with honesty and fairness. The risk of harm here was not hypothetical; by depriving families of emergency support and eroding institutional trust, her actions directly undermined the financial safety net upon which vulnerable service users depend.

272. The panel considered Mrs Richardson’s failure to carry out both statutory and non-statutory visits as a grave neglect of her safeguarding duties. Social workers are uniquely placed to identify and act on early signs of abuse, neglect, or deterioration in family circumstances. When visits are not undertaken, those warning signs go unseen. Her failure to visit left children without oversight and compromised their right to be protected. More troubling still was her creation of false records to suggest these visits

had taken place. The panel considered this a particularly serious act, disguising inaction while giving the false appearance of engagement. The risk of harm in this context was significant; children were exposed to ongoing risk without the intervention they may have needed, and colleagues were misled into believing the situation was under control when it was not.

273. The panel considered the failure to keep full, clear, and contemporaneous records to be a serious breach of professional duty. Record keeping is not a procedural task, it is integral to the continuity of care, effective safeguarding, and professional accountability. In this case, records were not only incomplete or delayed but deliberately falsified. This behaviour corrupted the case file, distorted the social work narrative, and misled other professionals who relied on those records to plan interventions and assess risk. The harm here lies in the false sense of security such records create. When records suggest a child has been seen and is safe, necessary action may be delayed or foregone altogether. Mrs Richardson's actions therefore introduced significant risk into a system designed to protect.
274. The panel considered Mrs Richardson's failure to retain her professional diary as another serious breach of her duty to maintain verifiable, accurate records. The diary would have been a key contemporaneous source of evidence in relation to her visits, mileage, and casework. She would have known of the importance of keeping diaries through her training, practice and experience. Her failure to preserve it, obstructed the ability of her employer and regulator to assess the accuracy of her claims. Her explanations about the diary's disappearance shifted over time, and she ultimately acknowledged that she had not complied with policy. There is no allegation that she deliberately withheld or disposed of the diary: the panel has not made a finding in this regard and stops short of speculating as to why she did not produce the diary. The fact is that she did not and that alone is serious. The harm here was indirect but serious: it frustrated legitimate investigation into her practice and prevented a transparent review of concerns that affected both service users and public funds.
275. The panel was particularly concerned by the content of the Section 7 court report submitted by Mrs Richardson, which included false information about a child's behaviour and inaccurate claims regarding her own involvement. Courts are required to make difficult, complex and sensitive decisions about the welfare of children. To do so, courts rely heavily on social workers to provide objective, evidence-based assessments when determining a child's future care arrangements. Mrs Richardson's report falsely stated that the child had engaged in self-injurious behaviour and that she had conducted home visits which had not occurred. These inaccuracies were not incidental; they could have had significant consequences for judicial decisions affecting the child's welfare and family relationships. The harm here was multifaceted; emotional harm to the family caused by inaccurate statements, procedural delay caused by the court's inability to rely on the report, and broader reputational harm to the social work profession's role in legal proceedings. The evidence presented to the panel was that as a result of the court report being inaccurate, a substantive court

hearing was adjourned for a lengthy period and this delay had a significantly adverse effect on the well-being of the child.

276. The panel considered her lack of honesty with her recruitment agency to be further indicative of a pattern of deceit. She failed to disclose that she was subject to disciplinary and regulatory investigation and gave a materially misleading explanation for the termination of her previous role. Recruitment agencies rely on accurate information to ensure safe and appropriate placements. By concealing her professional history, Mrs Richardson knowingly deprived the agency of the ability to carry out proper risk assessments. The harm in this instance lies in the potential placement of an unsuitable practitioner into roles where she might be responsible for safeguarding decisions, resource allocation, and direct contact with vulnerable families.
277. The panel also found that Mrs Richardson's failure to self-refer to Social Work England was a serious breach of her professional duty of candour. The obligation to self-report concerns is a fundamental component of professional accountability and public protection. Mrs Richardson was aware of this duty and had previously corresponded with the regulator, yet she chose not to disclose the emerging issues at Rochdale. This prevented earlier regulatory oversight. The risk of harm here was systemic: had the concerns been reported promptly, action might have been taken to prevent further breaches. Her omission therefore undermined the efficacy of regulatory safeguards and risked exposing additional service users to unsafe practice.
278. The panel considered but placed no reliance on the character references provided on Mrs Richardson's behalf. These statements were generic, written some years ago, appeared to have been prepared for employment purposes, and did not address the factual particulars found proved. There was no evidence that the authors were aware of the allegations, nor any indication that Mrs Richardson had accepted responsibility or demonstrated insight. In the panel's view, the references carried no meaningful weight in mitigating the gravity of the misconduct.
279. Taken together, the panel considered Mrs Richardson's behaviour to have fallen very far short of the standards expected of social workers and substantially far from what would be considered proper in the circumstances.
280. Accordingly, the panel was satisfied that the proven allegations at 1 to 11 amount, individually and collectively, to serious misconduct.

The panel's decision on Impairment:

281. The panel next considered whether Mrs Richardson's fitness to practise is currently impaired by reason of her serious misconduct. In doing so, the panel took into account the full factual context of the findings already made, the gravity and breadth of the misconduct, and the overarching purpose of fitness to practise proceedings, which is to protect the public, maintain public confidence in the profession, and uphold

professional standards. The panel also had regard to the guidance in *CHRE v NMC and Grant* [2011] EWHC 927 (Admin), and in particular whether the conduct in question demonstrated that Mrs Richardson has in the past acted, or is liable in the future to act, in a way that places service users at unwarranted risk of harm, brings the profession into disrepute, breaches fundamental tenets of the profession, or involves dishonesty.

282. The panel reminded itself that the test for impairment is forward-looking. It must assess whether Mrs Richardson's fitness to practise is currently impaired, taking into account her level of insight, any steps taken to remediate her behaviour, the risk of repetition, and the need to uphold public trust and professional standards.
283. The panel began by considering the personal component of impairment. In particular, it considered whether Mrs Richardson had demonstrated any insight into her misconduct. The panel looked for evidence that she accepted responsibility for her actions, recognised how and why she came to behave as she did, and understood the consequences of her conduct, particularly for those affected by it. Mrs Richardson did not attend the majority of the hearing and did not give oral evidence. The panel therefore gave careful attention to her written communications with Social Work England, including her reflective narrative.
284. The panel could identify no significant evidence of insight. Mrs Richardson denied all of the factual allegations, save for the failure to retain her diary, and at no stage in the written materials before the panel did she acknowledge that her conduct had fallen seriously short of professional standards. In her reflective narrative, Mrs Richardson consistently sought to place responsibility on others, blaming managers, administrative systems, and staff at both Lancashire County Council and Rochdale Borough Council, as well as the recruitment agency. Rather than accepting responsibility, she presented herself as a victim of circumstance and workplace dysfunction.
285. The panel was particularly concerned by Mrs Richardson's claim in the latter part of her reflective narrative, in which she stated, "*It is evident that there have been no concerns regarding my practice/ethics or conduct.*" That assertion appears to have been written at a time when she had already moved to Rochdale. Serious concerns regarding her misuse of petty cash, her failure to undertake statutory visits, and the falsification of records emerged shortly thereafter. This statement, in the panel's view, showed a profound lack of insight and a continued failure to accept the reality of her actions and their consequences. Overall, the panel concluded that Mrs Richardson had not demonstrated any meaningful or developing insight.
286. The panel then considered whether Mrs Richardson's misconduct was remediable, and if so, whether it had been remediated. It noted that her misconduct involved repeated acts of dishonesty over a sustained period and across multiple professional contexts. These included falsifying records of visits, misusing petty cash, submitting false mileage claims, misleading the family court with inaccurate report, and failing to declare significant matters to her agency and her regulator. These were not isolated errors, but persistent breaches of trust involving deliberate concealment and

misrepresentation. The panel considered that misconduct of this nature, involving deeply rooted attitudinal issues, would be inherently difficult to remediate.

287. Even if it were remediable, the panel found that Mrs Richardson had made no attempt to do so. There was no evidence of any training, supervision, mentoring, or reflective practice undertaken since the events. She had not demonstrated any engagement with continuing professional development, nor had she provided evidence of learning around safeguarding, ethics, or professional accountability. There was no evidence of professional support, rehabilitation, or efforts to regain the trust of the profession or the public. Accordingly, the panel concluded that the misconduct had not been remediated in any form.
288. The panel also found no evidence of genuine remorse. Mrs Richardson's written accounts referred at points to her personal circumstances, but there was no expression of regret for the harm caused to others, nor any recognition of the potential impact on the children she failed to visit, the families affected by her misuse of public funds, the professionals misled by her records, or the courts that relied on her inaccurate reporting. In the panel's view, the absence of remorse further supported the conclusion that Mrs Richardson had not come to terms with the seriousness of her misconduct.
289. In these circumstances, the panel was satisfied that Mrs Richardson presents a continuing and significant risk of repeating her misconduct. The panel had no assurance that, if placed in a similar position again, she would act differently. The panel was therefore satisfied that her fitness to practise is currently impaired on the basis of the personal component.
290. The panel then considered the public component of impairment. The panel was satisfied that Mrs Richardson presents a current and serious risk of causing significant harm to service users. It reached this conclusion by reference to its earlier findings and the nature of the misconduct. Mrs Richardson retained petty cash intended for service users, failed to undertake safeguarding visits to vulnerable children, created false records of contact, and submitted a misleading Section 7 report to the court. These acts created real and immediate risks, children were left unseen and unsupported, safeguarding opportunities were missed, and the financial needs of service users were ignored. The panel was satisfied that such conduct, if repeated, would place service users at serious risk of harm.
291. The panel was also satisfied that a finding of current impairment is necessary to maintain public confidence in the profession and the regulatory process. Social workers must be trusted by the public if they are to carry out their vital role. Mrs Richardson's conduct particularly her dishonesty around financial claims, record-keeping, and court reporting would cause members of the public to question whether they could trust a social worker entering their home. A failure to make a finding of impairment in this case would send an unacceptable message to the public that such conduct could go unaddressed. That would significantly undermine the credibility of the profession and its regulator. The panel was satisfied that a finding of impairment is

necessary to reassure the public that serious misconduct is taken seriously and that appropriate action will be taken.

292. The panel also concluded that a finding of impairment is necessary to uphold professional standards. Social workers are held to high standards of honesty, accountability, safeguarding, and integrity. These are not aspirational ideals, they are essential to protecting the public and maintaining confidence in the profession. Mrs Richardson's sustained dishonesty and repeated neglect of her duties represented a serious breach of those standards. A failure to make a finding of impairment would fail to mark the gravity of that breach and would risk signalling to other professionals that such behaviour may be tolerated. The panel was satisfied that a clear regulatory response was required to affirm the standards expected of all social workers.
293. For these reasons, the panel found that Mrs Richardson's fitness to practise is currently impaired on both the personal and public components. A finding of impairment is necessary not only to protect the public from future harm but also to reaffirm the values of accountability, transparency, and trust that underpin social work. It is required to maintain confidence in the profession and to uphold the standards that are fundamental to safe and ethical social work practice.

Submissions and advice on sanction:

294. Ms Steels made submissions to the panel on behalf of Social Work England regarding the appropriate sanction following the panel's findings of serious misconduct and current impairment. She submitted that the only proportionate and appropriate outcome in this case was a removal order. Ms Steels reminded the panel of its clear findings that Mrs Richardson's conduct involved repeated, egregious breaches of fundamental professional standards, including dishonesty, falsification of court reports, and failures in safeguarding, which had caused or risked causing significant harm. She emphasised that the panel had already found Mrs Richardson demonstrated no meaningful insight or remediation, and posed a continuing risk to the public.
295. Ms Steels referred the panel to Social Work England's Sanctions Guidance, highlighting that removal is appropriate in cases involving persistent dishonesty, attitudinal failings, and a lack of insight. She submitted that the gravity, extent, and repeated nature of Mrs Richardson's misconduct, across two employers and over a prolonged period, rendered lesser sanctions such as advice, warning, conditions of practice, or suspension wholly insufficient to protect the public or maintain public confidence in the profession. She submitted that conditions would not be workable or enforceable given Mrs Richardson's lack of engagement and her unwillingness to comply with professional obligations.
296. In conclusion, Ms Steels submitted that only a removal order would adequately mark the seriousness of the misconduct, protect the public from future harm, and uphold public confidence and proper professional standards. While acknowledging the panel's

duty to impose the least restrictive sanction necessary, she maintained that all lesser sanctions would fall short of addressing the serious regulatory concerns identified and would not meet the overarching objective.

297. The panel heard and accepted the advice from the legal adviser on the approach to sanction. The panel was advised that its primary purpose when determining sanction is to protect the public, maintain public confidence in the profession, and uphold proper professional standards. The panel was reminded that sanctions are not punitive in nature but must be proportionate, fair, and consistent with its earlier findings on facts, grounds, and impairment. The panel was directed to consider the *Impairment and Sanctions Guidance* issued by Social Work England and to apply the principle of proportionality, balancing the public interest against the interests of the social worker.
298. The panel was further advised that it should consider any aggravating and mitigating factors and assess each sanction in ascending order of seriousness, identifying the least restrictive outcome necessary to achieve the regulatory objectives. The panel was reminded that outcomes such as advice or warnings are not suitable where there is a current risk to the public, and that conditions of practice are typically appropriate only where the concerns are potentially remediable and there is insight, engagement, and compliance.

Panel's decision on sanction:

299. In determining the appropriate and proportionate sanction in this case, the panel had full regard to the Sanctions Guidance issued by Social Work England, its findings on facts, misconduct, and impairment, the statutory overarching objective of protecting the public, maintaining public confidence in the profession, and upholding proper standards of conduct. The panel also carefully considered the submissions made on behalf of Social Work England, which invited the panel to impose a Removal Order, and reminded itself of its duty to act proportionately by applying the least restrictive sanction that would meet the regulatory objectives. In doing so, the panel took into account all relevant aggravating and mitigating factors to ensure that its decision was fair, balanced, and properly reflective of the seriousness of the case.
300. The panel began by identifying and weighing relevant aggravating and mitigating factors. It found that the aggravating features in this case were both numerous and serious. Mrs Richardson's misconduct involved sustained and wide-ranging dishonesty across several core areas of professional responsibility. This included false mileage claims, misuse of petty cash intended for vulnerable families, falsification of records of statutory and non-statutory visits, the submission of a materially inaccurate Section 7 report to the court, and failure to disclose significant information to her agency and regulator. The conduct spanned two different local authorities and was carried out over a protracted period, evidencing a pattern of unethical behaviour rather than isolated lapses.

301. The panel found that Mrs Richardson's actions caused actual harm, most notably to a child whose court hearing was adjourned because of her inaccurate report. The delay, as supported by evidence heard, led to developmental regression and emotional distress. Other children were placed at risk due to missed statutory visits and falsified contact records. Mrs Richardson's actions also undermined the integrity of safeguarding systems, disrupted judicial proceedings, and misled employers, colleagues, and courts.
302. The panel considered the issue of trust to be central to this case. Social workers occupy positions of authority in situations where vulnerable children, families, professionals, and the courts rely on their honesty, accuracy, and reliability. Mrs Richardson's conduct represented a sustained breach of that trust. She knowingly submitted false records, withheld critical information, fabricated legal documents, and misused public funds. This conduct not only violated the expectations of her employers and regulator but also betrayed the confidence of service users and their carers. Trust in social work is fundamental, and Mrs Richardson's repeated and deliberate actions significantly undermined that trust across the professional relationships she held.
303. Person 1, the child's grandfather, gave compelling evidence of the harm caused and stated that: *"The experience we had with Mrs Richardson was really, really bad... we expected someone to be professional... Some of the behaviours and lack of response and lack of communication didn't reflect well with me in terms of the support we were expecting, and we needed. It was a cry out for help... all of the occasions that she failed to attend, failed to answer phone calls, failed to support us.. it was shocking, and we had hoped for better."* He went on to say in his written statement: *"The experience cost us money and the trauma was absolutely awful, which still haunts us."*
304. Person 2, the child's aunt and carer, also spoke about the emotional toll and risk to placement stability and said that she had felt *"Angry, frustrated. Helpless. Didn't know where to turn, where to go. I was just left to deal with everything on my own... we were in a very, very, very dark place with no support."* She added: *"The way she acted as a social worker ...well, she wasn't our social worker anyway. There was no communication... it could have been very, very detrimental to his placement here. Because that placement could have broken down, we were at our wits' end."*
305. In describing the danger posed by Mrs Richardson's dishonesty, Person 2 responded to evidence shown to her during the hearing by saying: *"It has made me quite angry and upset because how can a professional person have so much deceit?"* In her statement, she described how her urgent calls went unanswered: *"This is an emergency, [E] is regressing, he is self-harming, he is running off for hours on end... Can you return my call as soon as possible".... but never heard back from Mrs Richardson."*
306. Ms Woodman, the Head Teacher of the child's school, corroborated these concerns, stating: *"...my understanding is that carers hadn't heard from her [Mrs Richardson] either and had not really seen her... They were having some difficulties with the child at*

home... We were trying to support the family because we didn't want that placement... to break down... He was a very, very vulnerable child."

307. The dishonesty was deliberate and repeated, representing a serious breach of public trust and of the fundamental values of the social work profession.
308. In contrast, the panel found little to no mitigation. It considered Mrs Richardson's references in her reflective narrative of overwork, alleged management bullying, and difficult personal circumstances. The panel accepted that she experienced challenges in her personal life but found no credible evidence that her workload was excessive compared to her peers, nor any evidence that she was subjected to bullying. In fact, witnesses described efforts by management to support her. While her personal difficulties were acknowledged, the panel concluded that they could not excuse or mitigate the significant harm caused to vulnerable service users. Social workers have a professional responsibility to ensure that personal issues do not impact the safety and wellbeing of those in their care.
309. The panel also acknowledged the length of time that had elapsed from the initial investigation to the conclusion of this hearing. It recognised that the process had taken several years to conclude and that, in some cases, delay may be capable of amounting to limited mitigation. However, the panel was satisfied that in this case, any delay in the regulatory process was entirely outweighed by the gravity, extent, and seriousness of Mrs Richardson's misconduct. The length of time taken to resolve these proceedings did not diminish the panel's findings or its responsibility to act in accordance with the statutory overarching objective.
310. The panel also found that Mrs Richardson had demonstrated no insight, no remorse, and no remediation. She denied all allegations save for one, did not attend the substantive hearing, and engaged only minimally with the regulatory process. Her written submissions consistently sought to deflect responsibility, often blaming managers, systems, and colleagues. In the panel's view, there was a complete absence of meaningful reflection on the gravity of her misconduct or its impact on others. As a result, the panel had no confidence that she would act differently if placed in similar circumstances again.
311. The panel considered each available sanction in ascending order of seriousness.
312. It determined that taking no further action, or issuing advice or a warning, would be wholly inadequate. These outcomes are only appropriate where there is no current risk to the public and where the misconduct is minor or isolated. The panel had already found that Mrs Richardson presents a continuing and serious risk of harm. Such outcomes would neither restrict her practice nor address the gravity of the concerns raised, and would undermine public confidence in the profession.
313. The panel then considered whether a conditions of practice order could be imposed. It concluded that conditions would be wholly inappropriate. Mrs Richardson's misconduct did not arise from a lack of competence or a health issue but from

repeated and serious attitudinal failings. Her dishonesty, failure to safeguard, and deception of the regulator and courts cannot be addressed through conditions. For example, a condition requiring her to be supervised at work would require an unworkable level of supervision. Moreover, Mrs Richardson's failure to engage in the regulatory process meant there was no basis on which to believe she would comply with any conditions, rendering them unworkable and ineffective. In any event, a conditions of practice order would not reflect the gravity of the concerns raised and would undermine public confidence in the profession.

314. The panel next considered whether a suspension order would be appropriate. Suspension may be suitable where a social worker has shown some insight and there is a realistic prospect of remediation. That is not the case here. Mrs Richardson has provided no evidence of insight or of any steps taken to address her misconduct. The panel found that even a maximum period of suspension would not reflect the seriousness of the misconduct or offer any assurance that she would be safe to return to practice. It would not adequately protect the public, maintain public confidence, or uphold professional standards. It would also risk giving the impression that her conduct could be tolerated or rehabilitated when it was, in the panel's view, fundamentally incompatible with professional registration.
315. Having rejected all lesser sanctions, the panel concluded that a removal order was the only appropriate and proportionate outcome. Mrs Richardson's conduct was serious, sustained, and deliberate. It involved multiple breaches of trust and multiple instances of dishonesty that affected employers, courts, colleagues, and vulnerable service users. It undermined the values of honesty, reliability, and accountability that are essential to safe and ethical social work. Her behaviour caused actual harm, placed others at risk of harm, and damaged the reputation of the profession. She has made no admissions (save for the missing diary), demonstrated no insight, minimal engagement, and no indication of any desire or ability to remediate her conduct.
316. The panel was satisfied that only a removal order could adequately protect the public, maintain confidence in the profession, and uphold the standards expected of registered social workers. Mrs Richardson's conduct was not only serious and sustained but also fundamentally dishonest and struck at the very heart of what the public is entitled to expect from a registered social worker. Such misconduct is entirely incompatible with continued registration. A lesser sanction would fail to mark the gravity of the breaches and would send the message that dishonesty of this nature can be tolerated within social work practice.
317. The panel carefully considered Mrs Richardson's personal interests, recognising the grave impact of removal on her career. However, it found that the seriousness of her conduct, the ongoing risk of harm, and the need to protect the public and uphold professional standards outweighed those interests, making removal necessary and proportionate.

318. In light of the seriousness of her misconduct and the ongoing risk she presents, removal was the only sanction capable of fulfilling the regulatory objectives.
319. **The panel therefore directs the Registrar to remove the name of Mrs Brenda Richardson, registration number SW106267, from the register of social workers in England.**

Interim order:

320. The panel next considered an application by Ms Steels for an interim suspension order for 18 months to cover the appeal period before the final order of removal becomes effective.
321. The panel heard and accepted the advice of the legal adviser on its power to make an interim order under paragraph 11(1)(b) of Schedule 2 of the Social Workers Regulations 2018.
322. The panel was mindful of its earlier findings and considered that it would be wholly incompatible with the seriousness of those findings not to impose an interim order. The panel had found Mrs Richardson's misconduct to be serious, sustained, and involving dishonesty, with an ongoing risk of repetition. In those circumstances, allowing her to practise unrestricted during the appeal period would present an unacceptable risk to the public and would undermine public confidence in the profession and the regulatory process.
323. The panel considered paragraph 207 of the *Impairment and Sanctions Guidance*, which states: "*An interim order may be necessary where the adjudicators have decided that a final order is required, which restricts or removes the ability for the social worker to practise... without an interim order, the social worker will be able to practise unrestricted until the order takes effect. This goes against our overarching objective of public protection.*"
324. The panel concluded that an interim suspension order is necessary and proportionate in order to protect the public, to maintain confidence in the profession, and to uphold proper standards of conduct and behaviour. It therefore made an interim suspension order for a period of 18 months. This order will come to an end upon the expiry of the appeal period, unless an appeal is lodged with the High Court. If no appeal is filed, the final order of removal from the register will take effect at that point.
325. In line with Ms Steel's submissions and the advice of the legal adviser, the panel decided not to make any order in relation to the existing interim order.
326. Before concluding this matter, the panel had the following observations to make.
327. First, concerning delay. There is a public interest in the timely resolution of regulatory proceedings. The panel expresses its concern that this matter was not brought forward for a final hearing and concluded sooner than now. The panel understands that Social

Work England, which is responsible for bringing cases to a hearing, is taking steps to address delays, steps that can only be welcomed if it avoids similar delays to cases in the future.

328. The panel expresses a concern that the legal environment was such that LCC felt constrained to give a 'neutral' reference, enabling Mrs Richardson to be taken on by the employment agency and placed with Rochdale Council when serious concerns about her performance were known but before an interim order was in place. The panel's understanding is that this concern may have been addressed with changes in law/practice, which if correct, is to be welcomed.
329. Finally, the panel takes this opportunity to express its thanks to the witnesses who stayed with the case over so many years in order to share their evidence with the panel. They are to be commended for doing so. The panel goes further in relation to the two lay witnesses, Person 1 and Person 2. The panel was struck by the depth of their kindness and resolve as each sought to do the right thing in taking on responsibility for a child, a responsibility that brought significant challenges and difficulties into their respective lives. They deserved all the support that could properly have been given to them in their endeavours. The decency of Person 1 and Person 2 deserves to be acknowledged.

Right of appeal:

330. Under Paragraph 16(1)(a) of Schedule 2 of the regulations, the social worker may appeal to the High Court against the decision of adjudicators:
- 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.
331. Under Paragraph 16(2) of Schedule 2 of the regulations 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.
332. Under Regulation 9(4) of the regulations this order may not be recorded until the expiry of the period within which an appeal against the order could be made, or where an appeal against the order has been made, before the appeal is withdrawn or otherwise finally disposed of.
333. This notice is served in accordance with Rules 44 and 45 of the Social Work England Fitness to Practice Rules 2019 (as amended).

Review of final orders:

334. Under Paragraph 15(1), 15(2) and 15(3) of Schedule 2 of the regulations:

- 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), and a final order does not have effect until after the expiry of that period

335. Under Rule 16(aa) of the rules 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:

336. Please note that in accordance with section 29 of the National Health Service Reform and Health Care Professions Act 2002, a final 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>.