

Social worker: Hannah Khanom

Registration number: SW130862

Fitness to Practise

Final Order Review Meeting

Date of meeting: 12 September 2025

Meeting venue: Remote

Final order being reviewed: Conditions of practice order (expiring 24 October 2025)

Meeting outcome: Conditions of Practice order amended for a further 12 months with effect from the expiry of the current order

Introduction and attendees:

1. This is the first review of a final conditions of practice order under paragraph 15(2) of schedule 2 of The Social Workers Regulations 2018 (as amended) (“the regulations”) originally imposed after agreed disposal for a period of 18 months by case examiners on behalf of Social Work England on 25 April 2024.
2. Ms Khanom did not attend and was not represented.
3. Social Work England was represented by Capsticks LLP and their written submissions are set out within the notice of hearing letter.

Adjudicators	Role
Karen McArthur	Chair
Natalie Williams	Social worker adjudicator

Hearings team/Legal adviser	Role
Jenna Keats	Hearings officer
Kathryn Tinsley	Hearings support officer
Ruksana Kosser	Legal adviser

Service of notice:

4. The panel of adjudicators had careful regard to the documents contained in the final order review service bundle as follows:
 - A copy of the notice of the final order review hearing dated 08 August 2025 and addressed to Ms Khanom at their email address which they provided to Social Work England;
 - An extract from the Social Work England Register as of 08 August 2025 detailing Ms Khanom’s registered address;
 - A copy of a signed statement of service, on behalf of Social Work England, confirming that on 08 August 2025 the writer sent by email to Ms Khanom at the address referred to above: notice of hearing and related documents;
5. The panel accepted the advice of the legal adviser in relation to service of notice.
6. Having had regard to the 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 Ms Khanom in accordance with Rules 14,15,44 and 45.

Proceeding in the absence of the social worker:

7. The panel accepted the advice of the legal adviser in relation to the factors it should take into account when considering this application. This included reference to Rule 43 of the Rules and the cases of *R v Jones [2002] UKHL 5*; *General Medical Council v Adeogba [2016] EWCA Civ 162*. The panel also took into account Social Work England guidance ‘Service of notices and proceeding in the absence of the social worker’.
8. The panel considered all the information before it regarding notice. The panel also noted that Ms Khanom had contacted Social Work England via email on the 28 August 2025 to inform them that she would not be attending the review but attached written submissions for the panel to consider.
9. The panel concluded that Ms Khanom had chosen not to attend. Having weighed the interests of Ms Khanom in regard to her attendance at the hearing with those of Social Work England and the public interest in an expeditious disposal of this hearing, the panel determined to proceed, as Ms Khanom was content for the review to proceed in her absence and she provided written submissions.

Proceeding with the final order review as a meeting:

10. The notice of final order review informed Ms Khanom that the review would take place as a meeting. The notice stated:

“If you would like to attend before the adjudicators in order to make oral submissions, please confirm your intention by no later than 4pm on 26 August 2025. Unless we hear from you to the contrary, we shall assume that you do not want to attend a hearing and Social Work England may decide to deal with the review as a meeting. If Social Work England do hold a meeting, the adjudicators will be provided with a copy of this letter setting out Social Work England’s submissions and a copy of any written submissions you provide.”

11. The panel took into account the email sent by Ms Khanom on the 28 August 2025 in which she confirmed that she would not be attending but forwarded prepared written submissions to be considered in advance of the review. Ms Khanom also understood that in her absence, the review could proceed as a meeting.
12. The panel heard and accepted the advice of the legal adviser with regard to Rule 16(c) of the Fitness to Practise Rules 2019 (as amended) which provides:

“Where the registered social worker does not state within the period specified by the regulator whether they intend to attend before the regulator, the regulator may determine whether to make an order by means of a meeting.”
13. The panel was satisfied that it would be fair and appropriate to conduct the review in the form of a meeting in accordance with Rule 16(c).

Review of the current order:

14. This final order review hearing is taking place under Paragraph 15(1) of Schedule 2 of The Social Workers Regulations 2018 (as amended) and Social Work England's Fitness to Practise Rules 2019 (as amended).
15. The purpose of this review is to review the current conditions of practice order which was imposed on the 25 April 2024 for a period of 18 months and which is due to expire on the 24 October 2025.

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

16. As recorded in a final decision dated 25 April 2024, Case Examiners appointed by Social Work England determined that there was a realistic prospect that adjudicators would determine that Ms Khanom's fitness to practise was impaired on the grounds of competence and capability on the basis of the following regulatory concerns:

Whilst registered as a social worker

1. You failed to meet the required practice standards for your role in that you:

1.1) Did not complete written work within timescales and/or

1.2) Did not complete visits within timescales.

17. The Case Examiners also determined that it was not in the public interest to refer the case to a final hearing and proposed to dispose of the case by making a final order of conditions of practice for 18 months in respect of Ms Khanom.

18. Ms Khanom consented to that proposed disposal on 23 April 2024.

19. The case was returned to the Case Examiners on 25 April 2024. The Case Examiners determined to accept Ms Khanom's response. The Case Examiners remained satisfied that an accepted disposal by way of a condition of practice order for 18 months, was a fair and proportionate disposal and was the minimum necessary to protect the public and the wider public interest.

The case examiner on the 25 April 2024 determined the following with regard to impairment:

Impairment:

In considering the personal element of impairment, the case examiners have considered the test for personal impairment as set out in the case examiner guidance

(2022), namely whether the conduct is remediable; whether the social worker has undergone remediation and demonstrated insight; and whether there is a likelihood the matters alleged will be repeated. The case examiners should also look at whether the social worker has admitted the allegations, any relevant previous history and any testimonials that have been provided.

The case examiners note there is no previous history in respect of this social worker.

The social worker has accepted the concerns as they acknowledge that they made mistakes. However, their insight is limited as in their submissions, they are defensive and talk of not having the appropriate support, that they were given cases that were complex, one in particular that they found very challenging and that they were bullied by their manager. However, the case examiners note that the social worker states, 'I recognise the concerns raised but believe they do not encapsulate the entirety of my professional contributions' and 'I acknowledge the mistakes I made during my initial years as a newly qualified social worker and am now acutely aware of their impact on the lives of those I sought to help'.

In terms of remediation, the case examiners note that the social worker has been subject to an interim suspension order for the last 18 months, which has prevented them from working in a social work capacity. However, the social worker states that they have 'extensively researched the importance of record keeping by studying serious case reviews...this process has made me aware of the profound impact that inadequate record keeping can have on the wellbeing of service users'. The case examiners note that they have no independent verification of the research undertaken by the social worker.

As the social worker has not been in employment, the case examiners do not have any testimonials of the social worker's current work. However, the case examiners note that concerns were raised by more than one employer.

Due to the limited insight and remediation, the case examiners consider that there is a risk of repetition.

The case examiners next considered whether the social worker's alleged actions have the potential to undermine public confidence in social workers and whether this is a case where adjudicators may determine that public interest requires a finding of impairment. Public interest includes the need to uphold proper standards of conduct and behaviour and the need to maintain the public's trust and confidence in the profession.

A social worker who is found to have failed to have met the practice standards expected of them over a period of time has the potential to undermine public confidence. Members of the public may be concerned if the social worker were to practice unrestricted and would expect the regulator to have oversight of their practice.

The case examiners are of the view that in these circumstances, members of the public would expect a finding of impairment if the concerns were found proven.

Accordingly, the case examiners are satisfied that there is a realistic prospect of adjudicators making a finding of current impairment.

The case examiners on the 25 April 2024 determined the following with regard to sanction:

The case examiners are of the view the social worker's impairment continues to pose some current risk to public safety as there is insufficient evidence at this time of the social worker having developed full insight into their lack of competence and have been unable to demonstrate that they can practise safely due to the interim suspension order. Given this, the outcomes of no further action, advice, or warnings are considered inappropriate on the basis that these will not sufficiently protect the public.

The case examiners next considered a conditions of practice order being imposed on the social worker's registration. They concluded that this was the most appropriate and proportionate outcome. Conditions will provide the social worker a supportive framework within which to return to practice while protecting the public. It will also enable the regulator to maintain oversight and supervision of the social worker's practice. The case examiners note that the social worker is not currently in social work employment, however the evidence suggests that the social worker would like to return to practice. Further the social worker states, 'I am open to additional suggestions and guidance to continue improving my practice'. A conditions of practice order will provide a supportive framework for the social worker to return, and it would also serve to protect the public.

The case examiners did consider whether the next available sanction, suspension, would be more appropriate in this case. However, it was their view that suspension would be punitive, and it would risk further deskilling the social worker and be disproportionate as public protection could be achieved by a conditions of practice order.

In terms of duration, the sanctions guidance states that conditions can be imposed for up to three years at a time. When considering the timescale for the conditions, the case examiners have determined that a period of 18 months would be appropriate in this case. This period would allow the social worker to demonstrate that they have fully understood their responsibilities in terms of practising safely. Eighteen months will allow the social worker sufficient opportunity to return to a registered role and demonstrate they can practise safely. This period would allow the social worker to demonstrate over a sustained period, including at least one appraisal cycle that they had reached the necessary standards required of social workers. The case examiners consider a longer period unnecessary and disproportionate at this stage.

Social Work England submissions:

20. The panel noted the written submissions from Social Work England as outlined in the notice of hearing dated 08 August 2025:

Subject to any further information or documents, Social Work England invites the Panel to find the Social Worker's fitness to practice remains impaired. The Social Worker has not worked in a social work role since 2022, it has not, therefore, been possible to test compliance with most of the conditions since their imposition. As such the Panel may determine that there has been little change in circumstances since April 2024 and there remains a risk of repetition and that the fitness to practice of the Social Worker remains impaired.

The Social Worker has engaged appropriately with the fitness to practice process and complied with condition 16 when she applied for social work roles in March 2025 (albeit that she had to be reminded to provide conditions to prospective employers at the time of application).

There has also been compliance with condition 15, the Social Worker provided a reflective statement in October 2024, it is submitted this demonstrates some remediation, reflection and insight. However, it is limited and there is little evidence of the steps taken by the Social Worker to remediate their practice such as Continued Professional Development or testimonials.

In the event that the Panel conclude that the Social Worker's fitness to practise remains impaired Social Work England will invite the Panel to consider extending the Conditions of Practice Order for a further twelve months from its expiry. The Panel are invited to include a condition requiring the Social Worker to provide evidence of their Continued Professional Development. The Panel will be invited to consider whether it is appropriate to make recommendations regarding information that may assist a future Panel.

Social worker's written submissions

21. Ms Khanom in her written submissions requested the panel to remove the conditions of practice because they have significantly limited her opportunities to re-enter social work practice. Ms Khanom stated that despite actively seeking employment, she has not been successful and believes these restrictions are a key barrier to her being able to evidence her learning and progress.

22. Ms Khanom stated that it has been nearly three years since these proceedings began and during that time she has not only reflected deeply on her professional responsibilities but has grown significantly, in her personal life. Since becoming a mother, Ms Khanom stated that this has given her a greater understanding of the importance of safeguarding children and supporting families, reinforcing the values that first drew her to social work.
23. Ms Khanom stated that whilst she understood the importance of this process, she believed she was being held to account for practice as a newly qualified social worker, at a time she was still learning and developing. Ms Khanom stated that since then she has matured and gained further life experience and believes she has grown both personally and professionally.
24. In conclusion Ms Khanom stated that she believed that continuing these restrictions would only serve to prolong her disadvantage and prevent her from moving forward in her career. Lifting the restrictions would allow her to actively demonstrate the insight and progress that she has made, whilst contributing positively to the profession and the families and communities she wished to support. For all these reasons Ms Khanom requested the panel to consider removing the conditions of practice so that she can return to practice without unnecessary barriers.

Panel decision and reasons on current impairment:

25. In considering the question of current impairment, the panel undertook a comprehensive review of the final order in light of the current circumstances. It took into account the decision of the case examiners. However, it has exercised its own judgement in relation to the question of current impairment. The panel also took into account Social Work England's 'Impairment and sanctions guidance'.
26. The panel had regard to all of the documentation before it, including the decision and reasons of the case examiners and Ms Khanom's written submissions.
27. The panel accepted the advice of the legal adviser, which it incorporated into the decision below.
28. The panel reminded itself of its powers under Paragraph 15 of schedule 2, part 5 of the Social Worker Regulations 2018.
29. The panel also reminded itself of the importance of a review hearing, and it followed the sequence of decision making set out by Blake J in *Abraham v General Medical Council* [2008] EWHC 183:
- Address whether the fitness to practise is impaired before considering the appropriate sanction.
 - Whether all the concerns raised in the original finding of impairment have been sufficiently addressed to the panel's satisfaction.

- In practical terms there is a persuasive burden on the practitioner at a review to demonstrate that he or she has fully acknowledged why past professional performance was deficient and through insight, application, education, supervision, or other achievement sufficiently addressed the past impairments.

30. The panel had regard to the over-arching objective of protecting the public which involves the pursuit of the following objectives:

- To protect, promote and maintain the health, safety, and well-being of the public.
- To promote and maintain public confidence in the profession.
- To promote and maintain proper professional standards of conduct for members of the profession.

31. The panel first considered whether Ms Khanom's fitness to practise remains impaired. It kept in mind that there had already been a finding of impairment, and the panel considered whether Ms Khanom had demonstrated that she had taken sufficient steps to allay the concerns of the case examiners.

32. The panel acknowledged Ms Khanom's participation and engagement throughout these proceedings. The panel also noted Ms Khanom's compliance with the original condition 15 which was to read Social Work England's Professional Standards 2019 and provide a written reflection focusing on how her conduct was below the accepted standard of a social worker and what she should have done differently. Ms Khanom also provided evidence of sharing a written copy of the conditions of practice to prospective employers.

33. The panel noted that Ms Khanom had not been employed in a Social Work role since the conditions had been imposed. It had no evidence that Ms Khanom had undertaken any training or tasks that would contribute towards her continued professional development.

34. The panel read the written reflections that Ms Khanom submitted, however the panel was not satisfied that she had sufficiently addressed all the concerns and the panel considered that the risk of repetition remained.

35. The public interest would not be served by allowing Ms Khanom to return to unrestricted practise given the lack of evidence of full remediation. To do so would undermine public confidence in the regulator and the profession.

36. The panel therefore concluded that Ms Khanom's fitness to practise remains impaired, having regard to both the personal and the public interest.

Decision and reasons:

Sanctions

37. Having found Ms Khanom's fitness to practise is currently impaired, the panel then considered what, if any, sanction it should impose in this case. The panel had regard to the submissions made along with all the information and accepted the advice of the legal adviser.
38. The panel considered the written submissions made Social Work England, where they invited the panel to consider extending the conditions of practise order for 12 months. It noted the written submissions made by Ms Khanom in relation to sanctions. The panel also took into account the 'Impairment and Sanctions Guidance' published by Social Work England.
39. The panel was mindful that the purpose of any sanction is not to punish Ms Khanom, but to protect the public and the wider public interest. The public interest includes maintaining public confidence in the profession and Social Work England as its regulator and by upholding proper standards of conduct and behaviour. The panel applied the principle of proportionality by weighing Ms Khanom's interests with the public interest.

Take no further action/advice/warning

40. The panel noted that none of these sanctions would restrict Ms Khanom's ability to practise. As such they were not appropriate or sufficient to address the concerns raised due to the nature of Ms Khanom's impairment which has not yet been demonstrably remedied.

Extend and amend the conditions of practice order for a further 12 months with effect from the expiry of the current order:

41. The panel went on to consider extending the conditions of practice order. The panel took the view that Ms Khanom's impairment was still capable of being remedied and was satisfied that a conditions of practice order was the appropriate order, taking account of Ms Khanom's compliance and progress since the order was imposed. The panel decided to amend and extend the current conditions of practice order for 12 months. This would allow Ms Khanom time to complete tasks and training related to her continued professional development, specifically training related to record keeping, completing visits within statutory timescales and time management.
42. The panel recommend that Ms Khanom also consider undertaking individual reading and research to expand her knowledge of social work practice. A future panel would be

assisted by Ms Khanom producing a written document identifying what she has learnt from her CPD and reflecting on how it would help her in future practice.

43. The panel further considered that any future panel would be greatly assisted by Ms Khanom's attendance and testimonials from any paid or unpaid work.
44. The panel decided that the following conditions of practice would be necessary and adequately protect the public and the wider public interest as well as being practical and sufficient to address the concerns.

Amended Conditions of practice

1. You must notify Social Work England within 7 days of any professional appointment you accept or are currently undertaking and provide the contact details of your employer, agency or any organisation with which you have a contract or arrangement to provide social work services, whether paid or voluntary.

2. You must allow Social Work England to exchange information with your employer, agency or any organisation with which you have a contract or arrangement to provide social work or educational services, and any reporter or workplace supervisor referred to in these conditions.

3. (a) At any time, you are providing social work services, which require you to be registered with Social Work England, you must agree to the appointment of a reporter nominated by you and approved by Social Work England. The reporter must be on Social Work England's register.

(b) You must not start or continue to work until these arrangements have been approved by Social Work England.

4. You must provide reports from your reporter to Social Work England every 6 months and at least 14 days prior to any review and Social Work England will make these reports available to any workplace supervisor referred to in these conditions on request.

5. You must inform Social Work England within 7 days of receiving notice of any formal disciplinary proceedings taken against you from the date these conditions take effect.

6. You must inform Social Work England within 7 days of receiving notice of any investigations or complaints made against you from the date these conditions take effect.

7. You must inform Social Work England if you apply for social work employment /

self-employment (paid or voluntary) outside England within 7 days of the date of application.

8. You must inform Social Work England if you are registered or subsequently apply for registration with any other UK regulator, overseas regulator or relevant authority within 7 days of the date of application [for future registration] or 7 days from the date these conditions take effect [for existing registration].

9. a. At any time you are employed, or providing social work services, which require you to be registered with Social Work England; you must place yourself and remain under the supervision of a workplace supervisor nominated by you and agreed by Social Work England. The workplace supervisor must be on Social Work England's register.

b. You must not start or continue to work until these arrangements have been approved by Social Work England.

10. You must work with your workplace supervisor to formulate a personal development plan, specifically designed to address the shortfalls in the following areas of your practice:

- Record keeping**
- Completing visits within statutory timescales**
- Time management**

11. You must provide a copy of your personal development plan to Social Work England within 6 weeks from the date these conditions take effect and an updated copy 4 weeks prior to any review.

12. You must provide reports from your workplace supervisor to Social Work England every 6 months and at least 14 days prior to any review, and Social Work England will make these reports available to any reporter referred to in these conditions on request.

13. You must only work as a social worker in premises where at least 2 other social workers are employed at any one time and are on the premises daily.

14. a. You must make arrangements for an audit to be carried out by your workplace supervisor in relation to your record keeping and documentation, and undertaking visits within timescales. The audit must be signed off by your workplace supervisor.

b. You must provide a copy of this audit to Social Work England every 6 months and at least 4 weeks prior to any review or, alternatively, confirm that there have been no such cases.

15. a. You must undertake minimum 6 hours of CPD in relation to record keeping, statutory timescales and timekeeping.

b. You must provide a written reflection on your CPD at least 4 weeks prior to any review.

16. You must provide a written copy of your conditions, within 7 days from the date these conditions take effect, the following parties that your registration is subject to the conditions listed at 1-15, above:

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

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

17. You must permit Social Work England to disclose the above conditions, 1-16, to any person requesting information about your registration status.

Suspension order

45. The panel, having considered that a conditions of practice order is most appropriate in the current circumstances, went on to consider whether a suspension order would be an appropriate sanction. The panel determined that a suspension order would be disproportionate, noting that the conditions of practice identified are able to address Ms Khanom's current impairment.

Right of appeal:

46. Under Paragraph 16(1)(b) of Schedule 2 of The Social Workers Regulations 2018 (as amended), the social worker may appeal to the High Court against:

- a. the decision of adjudicators:

- i. to make an interim order, other than an interim order made at the same time as a final order under paragraph 11(1)(b),
 - ii. not to revoke or vary such an order,
 - iii. to make a final order,
- b. the decision of the regulator on review of an interim order, or a final order, other than a decision to revoke the order.

47. Under Paragraph 16(2) of Schedule 2 of The Social Workers Regulations 2018 (as amended) an appeal must be filed before the end of the period of 28 days beginning with the day after the day on which the social worker is notified of the decision complained of.

48. Under Paragraph 15(1A) of Schedule 2 of The Social Workers Regulations 2018 (as amended), where a social worker appeals against a decision made under sub-paragraph (1), the decision being appealed takes effect from the date specified in that sub-paragraph notwithstanding any appeal against that decision.

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

Review of final orders:

50. Under regulation 15(1), 15(2) and 15(3) of Schedule 2 of The Social Workers Regulations 2018 (as amended):

- 15(1) The regulator must review a suspension order, or a conditions of practice order, before its expiry.
- 15(2) The regulator may review a final order where new evidence relevant to the order has become available after the making of the order, or when requested to do so by the social worker.
- 15(3) A request by the social worker under sub-paragraph (2) must be made within such period as the regulator determines in rules made under Regulation 25(5).

51. Under Rule 16(aa) of the Fitness to Practise Rules 2019 (as amended), a social worker requesting a review of a final order under paragraph 15 of Schedule 2 must make the request within 28 days of the day on which they are notified of the order.

The Professional Standards Authority

52. Please note that in accordance with section 29 of the National Health Service Reform and Health Care Professions Act 2002, a review decision made by Social Work England's panel of adjudicators can be referred by the Professional Standards Authority ("the PSA") to the High Court. The PSA can refer this decision to the High Court if it considers that the decision is not sufficient for the protection of the public. Further information about PSA appeals can be found on their website at:

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