



# **Social worker: Marie Ann Bliss**

## **Registration number: SW2191**

### **Fitness to Practise**

### **Final Hearing**

**Dates of hearing: 7 to 8 January 2026**

**Hearing venue: Remote**

**Hearing outcome:**

**Discontinuance application granted, fitness to practise not impaired, no further action**

## Introduction and attendees:

1. This is a hearing held under Part 5 of The Social Workers Regulations 2018 (as amended) (“the regulations”).
2. Ms Bliss did not attend and was represented by Ms Brambell.
3. Social Work England was represented by Mr Kirke, instructed by Capsticks LLP.
4. The panel of adjudicators conducting this review (the “panel”) and the other people involved in it were as follows:

<b>Adjudicators</b>	<b>Role</b>
Lesley White	Chair
Jacqueline Telfer	Social worker adjudicator
John Brookes	Lay adjudicator

<b>Hearings team/Legal adviser</b>	<b>Role</b>
Han Granger	Hearings officer
Jo Cooper	Hearings support officer
Zill-e Huma	Legal adviser

## Service of notice:

5. The panel 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 8 December 2025 and addressed to Ms Bliss at her email address which she provided to Social Work England;
  - An extract from the Social Work England Register as of 8 December 2025 detailing Ms Bliss’s registered email address;
  - A copy of a signed statement of service, on behalf of Social Work England, confirming that on 8 December 2025 the writer sent by email to Ms Bliss at the address referred to above: notice of hearing and related documents.
6. Having had regard to Rules 44 and 45 of the FTP Rules 2019 and all of the information before it including the confirmation from Ms Brambell in relation to the service of notice, the panel was satisfied that notice of this hearing had been served on Ms Bliss in accordance with Rules 44 and 45 of the FTP Rules 2019.

## Preliminary matter:

7. The panel, of its own motion, determined that matters relating to Ms Bliss’s health should be considered in private. In doing so, the panel relied on Rule 38(a), which provides that a hearing, or any part of it, shall be held in private where the focus is on

the physical or mental health of the registered social worker, thereby ensuring appropriate protection of privacy and dignity.

### **Proceeding in the absence of the social worker:**

8. Mr Kirke invited the panel to proceed with the hearing in the absence of Ms Bliss. He submitted that it was appropriate to do so in light of the confirmation from Ms Brambell, on behalf of Ms Bliss, that she was fully instructed to proceed in her client's absence. The panel was further informed by Ms Brambell that Ms Bliss had raised no objection to the hearing proceeding in her absence and had expressly consented to that course.
9. The panel took into account that Ms Bliss was represented by a fully instructed representative, that her absence was with her knowledge and consent, and that there was no application for an adjournment. Having reminded itself of the need to exercise caution when proceeding in absence, and having considered the interests of fairness and the public interest in the efficient disposal of proceedings, the panel was satisfied that it was fair and just to proceed with the hearing in the absence of Ms Bliss.

### **Allegations:**

10. *“1. Whilst registered as a social worker and in your role as Acting Operations Manager:*
  - a. When, between 3 December 2019 and 17 December 2019, you were made aware of the pre-existing relationship between Colleague 1 and Service User A you did not:*
    - i. Raise the issue with your line manager;*
    - ii. Inform yourself as to the details of the relationship beyond that which you were told;*
    - iii. Inform yourself as to what action had been taken in relation to Colleague 1 as a result of the relationship.*
  - b. When, on 18 December 2019, you became aware that Colleague 1 had disclosed that she had acted as a guarantor for Service User A you did not:*
    - i. Record the conversation in which you were informed of this;*
    - ii. Speak to and/or seek advice from your line manager;*
    - iii. Notify and/or seek advice from the safeguarding team and/or ensure that they were and/or had been notified;*
    - iv. Consider whether Colleague 1’s judgment and/or practice might be impaired as a result of her disclosure.*
  - c. When, on Friday 17 January 2020, you became aware that Colleague 1 had disclosed that she had taken out a car loan in her name for Service User A and/or that Service*

*User A had moved back to the area and/or was being treated at Colleague 1's place of work you:*

- i. Did not ask Colleague 2 for the details of Service User A;*
- ii. Did not check Mosaic for the details of Service User A;*
- iii. Did not ensure and/or check that Service User A was safeguarded for the weekend.*

*The matters outlined in paragraph 1 above amount to the statutory ground of misconduct.*

*Your fitness to practice is impaired by reason of misconduct."*

## **Background:**

11. At the material time, Ms Bliss was employed as a social worker by West Sussex County Council (the Council").
12. Ms Bliss qualified as a social worker in 2009 and commenced her employment with the Council on 8 September 2009. At the time relevant to these proceedings, she was the Acting Operations Manager for the Council's Mental Health Services, having taken up that role on 3 December 2019.
13. The concerns in this case arose from fitness to practise issues involving Virginia ("Ginny") Morphy, a social worker employed by the Council, who was alleged to have allowed an inappropriate relationship to develop with Service User A. Service User A was a young female care leaver with a history of significant mental health difficulties, including self-harm, personality disorder, and substance misuse.
14. Ms Morphy became Service User A's Lead Practitioner in June 2016 and, in that role, was responsible for coordinating Service User A's care. Ms Morphy's line manager was Sine Sayers, a Social Care Professional Lead.
15. At the material time, Ms Bliss was Ms Sayers' direct line manager. In that management capacity, Ms Bliss had oversight responsibilities relevant to the matters giving rise to the concerns.
16. Social Work England received a referral in respect of Ms Bliss on 29 September 2020. The allegations against Ms Bliss centre on an asserted failure to take appropriate action when she was presented with information relating to Service User A and Ms Morphy's conduct.

## **Discontinuance application:**

**Social Work England:**

17. Mr Kirke made an application to the panel on behalf of Social Work England to discontinue the proceedings against Ms Bliss. He submitted that, although Social Work England maintains that there remains a realistic prospect of proving the factual allegations and misconduct, there is now no longer a realistic prospect of establishing that Ms Bliss's fitness to practise is currently impaired. The application was made on the basis of new information obtained since the Case Examiners' decision to refer the matter to a hearing.

18. By way of brief factual background, Mr Kirke outlined that at the material time Ms Bliss was employed by West Sussex County Council, having qualified as a social worker in 2009 and having been employed by the Council since September 2009. At the relevant time, she was the Acting Operations Manager for the Council's Mental Health Services, a role she commenced in December 2019. The referral against Ms Bliss arose in September 2020 and stemmed from wider fitness to practise concerns relating to another social worker, Virginia ("Ginny") Morphy, who was alleged to have allowed an inappropriate relationship to develop with a vulnerable service user, identified as Service User A. Ms Bliss was part of the management chain at the time, being the direct line manager of Ms Sayers, who in turn line managed Ms Morphy. The allegations against Ms Bliss therefore centre on an asserted failure to take appropriate action when concerns relating to Service User A and Ms Morphy were brought to her attention.

19. Mr Kirke referred the panel to the applicable legal framework, submitting that the application was made pursuant to Rule 52 of the Social Work England Fitness to Practise Rules. He explained that the Rule permits discontinuance where new information means there is no longer a realistic prospect of a finding of current impairment. He further relied on Social Work England's published guidance on discontinuance, which makes clear that, as a public body acting in the public interest, the regulator should not pursue allegations where there is no realistic prospect of impairment being found. He submitted that the panel should take an active and informed role in considering the application, consistent with established authority.

20. Turning to personal impairment, Mr Kirke submitted that there has been significant new information since the Case Examiners' decision. He emphasised that the allegations now date back approximately six years and that during this period Ms Bliss has continued to practise without restriction and without any further regulatory or employer concerns. On the contrary, she has progressed in senior leadership roles and has made a substantial positive contribution to adult mental health services. Mr Kirke highlighted that Ms Bliss has demonstrated sustained insight, ongoing reflection, and meaningful remediation, including seeking mentorship and openly acknowledging the issues raised by the allegations.

21. Mr Kirke submitted that the new material demonstrates that Ms Bliss has played an instrumental role in major service improvements, including leading complex service reorganisation, contributing to regional leadership groups, and supporting improvements in ethical, person-centred practice. She has been consistently described by senior colleagues as a trusted and integral leader, committed to high

professional standards, staff support, and service user welfare. Importantly, those with direct oversight of Ms Bliss, including senior leaders who were responsible for her management during and after the relevant period, have expressed that no further internal action was required and that they have no concerns regarding her current fitness to practise.

22. Mr Kirke acknowledged that Ms Bliss has not provided a further personal statement following the Case Examiners' referral decision, but submitted that this should be viewed in the context of her significant [PRIVATE]. He invited the panel to draw a positive inference from her extensive track record of safe and effective practice at a senior level over several years, which provides compelling evidence of remediation and the absence of any ongoing risk. He further submitted that, given [PRIVATE], any final hearing would likely be delayed, and by that time any potential concerns would be even more remote.
23. In relation to the risk of repetition, Mr Kirke submitted that it cannot be justifiably argued that such a risk exists. Ms Bliss has demonstrated sustained learning, reflection, and ethical leadership over a prolonged period, with no recurrence of concerns. Social Work England therefore submits that there is no longer a realistic prospect of establishing personal impairment.
24. Turning to the public interest, Mr Kirke submitted that while the public may initially have expected regulatory action when the concerns first arose, the position has materially changed. The passage of time, the extensive evidence of Ms Bliss' remediation and professional contribution, and the absence of any further concerns significantly reduce the public interest in continuing proceedings. He further submitted that the public would be reassured by the evidence of Ms Bliss' development, insight, and leadership, rather than concerned by the discontinuance of the case.
25. Mr Kirke also relied on the fact that the cases against Ms Morphy and Ms Sayers, who were more directly involved in the underlying events, have now been concluded by the regulator. He submitted that, in light of those outcomes, Ms Bliss' position is further removed from the core misconduct and that proportionality and fairness weigh against the continuation of proceedings in her case.
26. In conclusion, Mr Kirke submitted that, taking all matters together, there was no longer a realistic prospect of proving that Ms Bliss' fitness to practise is currently impaired on either personal or public interest grounds, and he therefore invited the panel to grant Social Work England's application and discontinue the proceedings against her in full; however, in the alternative, he acknowledged that if the panel did not agree that all of the regulatory concerns should be discontinued, it remained open to the panel, in accordance with Rule 52 and the applicable guidance, to determine whether some or all of the concerns should be discontinued and whether any aspect of the case should proceed to a substantive fitness to practise hearing.

## **Social worker:**

27. Ms Brambell, on behalf of Ms Bliss, invited the panel to consider the written submissions already before it and confirmed that the panel had had the opportunity to read them. She indicated that, while she was content for the submissions to stand as written, she would briefly summarise the key points for the record to assist the panel.
28. Ms Brambell submitted that it was accepted on Ms Bliss' behalf that it was no longer in the public interest to pursue the allegations. She confirmed that Ms Bliss supported Social Work England's application for discontinuance and did not seek to repeat the legal framework already addressed by Mr Kirke.
29. Ms Brambell then updated the panel on Ms Bliss's current health. She explained that Ms Bliss [PRIVATE].
30. Ms Brambell explained that Ms Bliss is [PRIVATE].
31. Turning to Ms Bliss's professional conduct, Ms Brambell reminded the panel that these proceedings have been ongoing since early 2020 and that, throughout the intervening period, Ms Bliss continued to practise and to perform at a senior level. She submitted that Ms Bliss's conduct during this time had been exemplary and demonstrated ongoing reflection and learning.
32. Ms Brambell outlined that, following the events giving rise to the allegations, Ms Bliss was substantively appointed to the senior management role she had previously held in an acting capacity, and remained in that role until she was forced to step down due to [PRIVATE]. She described Ms Bliss's responsibilities as including the leadership and management of a county-wide mental health social work service, covering older people's mental health, working-age adults' mental health, Approved Mental Health Professional services, and deprivation of liberty safeguards, working across West Sussex.
33. Ms Brambell submitted that Ms Bliss led and supported a number of significant service developments and pilot projects during this period, requiring her to work under sustained pressure with flexibility, creativity, and professionalism. She highlighted that Ms Bliss worked closely with senior leaders, contributed to regional leadership groups, and received awards in recognition of her values-led practice and leadership.
34. Ms Brambell referred the panel to supportive statements from senior colleagues, who attested to Ms Bliss being open and honest about the allegations, accepting errors of judgment, and demonstrating meaningful reflection and learning. Ms Brambell emphasised that senior leaders expressed no concerns about Ms Bliss's current fitness to practise and described her as a trusted and compassionate leader with a strong commitment to best practice and high standards of care.
35. Ms Brambell submitted that, taken together, Ms Bliss's sustained professional performance over more than five years, the absence of any further concerns, and the

strength of the supportive evidence demonstrate that there is no longer a realistic prospect of establishing current impairment.

36. Finally, Ms Brambell addressed a clarification point in relation to an earlier proposed warning. She explained that Ms Bliss had not sought to refuse a warning but had merely sought clarification at the time, which may have been miscommunicated. Ms Brambell confirmed that Ms Bliss wished it to be clear that she was willing to accept responsibility and did not seek to minimise her conduct.

37. Ms Brambell concluded by confirming that Ms Bliss did not oppose Social Work England's application to discontinue the proceedings and respectfully invited the panel to grant the application.

### **Legal advice:**

38. The panel accepted and followed the advice of the legal adviser in relation to the determination of an application for discontinuance under Rule 52 of the Fitness to Practise Rules 2019 (as amended). The legal adviser advised that the panel's role at this stage was not to determine the allegations or make findings of fact or misconduct, but to decide whether, in light of new information obtained since the Case Examiners' decision, there remained a realistic prospect of a finding that the social worker's fitness to practise is currently impaired.

39. The panel was advised that the applicable test is whether there remains a realistic, as opposed to fanciful or remote, prospect that a fitness to practise panel would find current impairment, assessed as at the date of decision and not solely by reference to historic conduct. The legal adviser reminded the panel that the regulator must identify the new information relied upon and explain why that information undermines the realistic prospect of impairment.

40. The panel was directed to Social Work England's Discontinuance Guidance, which confirms that the regulator, acting in the public interest, should not pursue allegations that have no realistic prospect of resulting in regulatory findings. The panel was advised that discontinuance may be appropriate where new evidence reduces the seriousness of the concerns, undermines the prospect of proving impairment, or gives rise to evidential difficulties, and that the panel must apply active scrutiny to ensure it is fully informed before discontinuing a case.

41. The legal adviser reminded the panel that the assessment of impairment is forward-looking and concerned with present and future risk. The panel was advised, consistently with *R (on the application of Grant) v Nursing and Midwifery Council* [2011] EWHC 927 (Admin) and *Cohen v General Medical Council* [2008] EWHC 581 (Admin), to consider the likelihood of repetition, the extent of insight and remediation, the passage of time, and whether a fair-minded and informed member of the public would consider a finding of impairment necessary to maintain confidence in the profession and uphold professional standards.

42. The panel was further advised that the existence of evidence capable of proving the facts or misconduct does not, of itself, require proceedings to continue if there is no realistic prospect that current impairment would be found. If satisfied that there is insufficient evidence of impairment, the panel must determine that fitness to practise is not impaired and give reasons; otherwise, the matter may proceed to a substantive hearing.

### **Panel's decision on discontinuance:**

43. The panel considered Social Work England's application to discontinue the proceedings against Ms Bliss under Rule 52 of the Fitness to Practise Rules 2019 (as amended). In doing so, the panel applied the advice of the legal adviser and reminded itself that its task was not to determine the factual allegations or make findings of misconduct, but to decide whether, in light of new information obtained since the Case Examiners' decision, there remained a realistic prospect that Ms Bliss's fitness to practise would be found to be currently impaired.

44. In doing so, the panel had regard to Social Work England's Discontinuance Guidance, which makes clear that, as a public body acting in the public interest, the regulator should not pursue regulatory concerns or allegations where there is no realistic prospect of a finding of current impairment, and that discontinuance is appropriate where new evidence materially undermines that prospect.

45. The panel noted that the proceedings have been ongoing since the initial referral in January 2020 and that, throughout the intervening period, Ms Bliss continued to practise as a social worker without restriction until she commenced [PRIVATE] on 31 December 2024. The panel placed significant weight on the fact that at no stage was Ms Bliss suspended from employment or subject to any interim measures, and that she continued to progress professionally during the currency of these proceedings. In particular, the panel noted that she was substantively appointed to the senior role of Head of Service for Mental Health at West Sussex County Council, a position of considerable responsibility and trust. In that role, she was accountable for leading and managing a complex, county-wide mental health social work service, overseeing a broad range of specialist functions and pilot projects, and providing strategic leadership across multiple service areas.

46. The panel was satisfied that the evidence demonstrated that Ms Bliss operated under sustained pressure in a demanding senior leadership role and made a substantial, positive, and measurable contribution to adult mental health services over a prolonged period. The panel noted that she led significant service reorganisation, initiated and developed new projects, contributed to regional leadership and professional networks, and worked closely with senior managers to improve outcomes for service users.

47. The panel also took into account that Ms Bliss was recognised through professional awards and consistently described by senior colleagues as a trusted, ethical, and values-driven leader. The panel considered this to be compelling evidence of safe, effective, and ethical practice following the events giving rise to the allegations and

gave Ms Bliss considerable credit for the quality, consistency, and impact of her professional work during the course of these lengthy proceedings.

48. In considering personal impairment, the panel took into account that the allegations date back approximately six years. During that time, there had been no further regulatory or employer concerns raised about Ms Bliss's practice. The panel accepted the evidence that Ms Bliss had demonstrated insight into the matters, had reflected on her actions, and had engaged in meaningful remediation, including seeking mentorship. The panel was satisfied that the absence of a more recent reflective statement was adequately explained by Ms Bliss's [PRIVATE] and that it would be unfair to draw any adverse inference from this.
49. The panel placed considerable reliance on the evidence from senior colleagues, including those with direct knowledge of Ms Bliss's work, who described her as open and honest about the allegations, accepting of errors of judgment, reflective, and committed to high professional standards. The panel accepted their consistent evidence that they had no concerns about her current fitness to practise and that no further internal action had been considered necessary.
50. Having regard to the sustained period of safe practice, the quality of insight and remediation demonstrated, and the absence of any recurrence of concerns, the panel concluded that there was no realistic risk of repetition. Accordingly, the panel was satisfied that there was no realistic prospect of establishing personal impairment.
51. Turning to the public interest, the panel accepted that, while public concern may have existed when the allegations first arose, the position has materially changed. The significant passage of time, the evidence of sustained remediation and exemplary professional contribution, and the absence of any ongoing concerns all weighed heavily against the need for further regulatory action. The panel further took into account that the cases against other individuals more directly involved in the underlying events had been concluded, reducing the relevance and proportionality of continuing proceedings against Ms Bliss.
52. The panel considered whether a fair-minded and informed member of the public, aware of all the circumstances including the historic nature of the allegations, the insight shown, the remediation undertaken, and Ms Bliss' subsequent professional record, would consider a finding of current impairment to be necessary. The panel concluded that such a member of the public would not. On the contrary, the panel considered that public confidence would be maintained by recognising the extent of Ms Bliss' learning, contribution, and the absence of any current risk.
53. In reaching its conclusion, the panel also took into account Ms Bliss's [PRIVATE] and the significant impact the prolonged proceedings had already had upon her. While this was not determinative, it formed part of the overall context in assessing proportionality and fairness.

54. For all of these reasons, the panel concluded that, notwithstanding that there may remain evidence capable of proving the factual allegations or misconduct, there was no longer a realistic prospect that Ms Bliss's fitness to practise would be found to be currently impaired on either personal or public interest grounds.

55. **Accordingly, the panel granted Social Work England's application under Rule 52 and determined that the proceedings against Ms Bliss be discontinued in full, with no further action taken.**

### **The Professional Standards Authority**

56. 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>.