



Social worker: Paul Brown
Registration number: SW21216
Fitness to Practise
Final Order Review hearing

Date of hearing: 25 March 2026

Hearing venue: Remote

Final order being reviewed: Suspension order (expiring 07 May 2026)

Hearing outcome: Extend the current suspension order for a further six months with effect from the expiry of the current order

Introduction and attendees:

1. This is the first review of a final suspension order originally imposed for a period of six months by a panel of adjudicators on 10 October 2025.
2. Mr Brown attended and was represented by Mr Walker.
3. Social Work England was represented by Ms Bonifai of counsel, instructed by Capsticks LLP.
4. The panel of adjudicators conducting this review (hereafter “the panel”) and the other people involved in it were as follows:

Adjudicators	Role
Sally Berlin	Chair
Julie Brown	Social worker adjudicator

Hearings team/Legal adviser	Role
Molly-Rose Brown	Hearings officer
Elsie Li	Hearings support officer
Scott McDonnell	Legal adviser

Review of the current order:

5. 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).
6. The purpose of this review is to review the current order, which is due to expire at the end of 6 May 2026. The order subject to review is a suspension order.
7. The panel confirmed that it was in receipt of the hearing bundle (50 pages) and the service and supplementary bundle (45 pages).

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

1. You became involved in an intimate relationship with the following colleagues you had managerial responsibility for:

a) GW

b) RM

2. You denied having an intimate relationship with RM when directly challenged by your line manager.

3. You asked GW not to disclose the relationships stating they may lose their jobs if they did.

Your conduct as described in allegations 2 and 3 was dishonest.

The final hearing panel on 10 October 2025 determined the following with regard to impairment:

8. *“The panel took account of Mr Brown’s references and steps taken to demonstrate remediation. Mr Brown has produced a considerable number of character references dating from 2021 to 2023 relating to his work at St Helena. A significant number of the authors make no reference to being aware of the regulatory proceedings which had already started.*
9. *Four exit interviews which were completed by Mr Brown were produced. There is no evidence in them to show that the individuals involved were aware of the regulatory proceedings or that they had given permission for them to be used for the hearing.*
10. *The panel took particular note of the reference from Rosalie Hall Brown dated 30 June 2023 who was Mr Brown’s line manager from November 2022 until at least June 2023 when it was written. She was aware of the regulatory proceedings, and her reference is very positive. However, since July 2023, there has been no up to date reference from anyone line managing Mr Brown despite his having continued to work in St Helena until March this year.*
11. *He has produced three references dated 2025 but they contain no evidence to show that the authors were aware of the regulatory proceedings and although positive in respect of his social work practice, there is no reference to his integrity. They seem more designed as references for future employment rather than for regulatory proceedings. Social Work England guidance is clear that testimonials should be up to date and little weight can be given to testimonials from persons not aware of the fitness to practise proceedings or the actions behind them.*
12. *None of the referees appear to have had any direct management of Mr Brown. In deciding whether Mr Brown’s fitness to practise is currently impaired the panel is disadvantaged by not having any reference from a line manager for the almost two years from July 2023 to March 2025.*
13. *The panel noted that Mr Brown had undertaken courses in respect of professional boundaries and considered his reflective statement, best practice essay, and his oral evidence. His reflective statement largely refers to his own feelings and the effect the investigation has had on him. However, it makes very little reference to the effect the relationships had on RM and GW, his wider colleagues, and his potential judgement and objectivity. There is little reference to the effect his dishonesty would have on public confidence in the social work profession.*
14. *Mr Brown’s best practice essay showed more understanding and insight into the effects of his behaviour. However, Mr Brown had also failed to demonstrate sufficient insight as*

demonstrated by his contention, during the early stages of these proceedings, that no disciplinary action was required. Taken together with his oral evidence in which the panel believes he sought to minimise the relationships and deflect responsibility for them, the panel finds that Mr Brown has not shown sufficient insight to provide assurance that his fitness to practise is not currently impaired.

15. *The panel referred to the four tests identified by Dame Janet Smith in her 5th Shipman Report and cited in CHRE v (1) NMC and (2) Grant.*

a. has in the past acted and/or is liable in the future to act so as to put a patient or patients at unwarranted risk of harm; and/or

b. has in the past brought and/or is liable in the future to bring the social work profession into disrepute; and/or

c. has in the past breached and/or is liable in the future to breach one of the fundamental tenets of the social work profession; and/or

d. has in the past acted dishonestly and/or is liable to act dishonestly in the future.

16. *The panel decided that although Mr Brown had not directly put Service Users at risk of harm, he had placed others in his team in a compromising position which could in turn have damaged the functionality of his team. His professionalism was clearly compromised.*

17. *With regard to the allegations found proved the panel found that Mr Brown's actions breached fundamental tenets of the Social Work Profession.*

18. *The panel found that Mr Brown has in the past and/or may be liable in the future to bring the social work profession into disrepute. It also found that Mr Brown has in the past acted dishonestly and/or is liable to act dishonestly in the future.*

19. *The panel finds that that Mr Brown's practice is currently impaired on both private and public grounds."*

The final hearing panel on 10 October 2025 determined the following with regard to sanction:

No action, warning or advice

20. *"The panel decided that none of these options were appropriate noting the seriousness of Mr Brown's misconduct and the requirement to protect the public, which would not be achieved by taking no action or giving Mr Brown a warning or advice."*

Conditions of practice

21. *"The panel decided that in light of Mr Brown's demonstrated dishonesty it could not identify any workable conditions, which would be able to address the risk that Mr Brown*

posed to service users given his behaviour and attitude as demonstrated by his misconduct.”

Suspension order

22. *“The panel then considered whether or not a suspension order would be appropriate. The panel was mindful of the objectives of Social Work England and the three elements of public protection, namely protecting the public from harm, maintaining public confidence, and declaring and upholding professional standards. The panel also considered the continuing risk posed by Mr Brown to service users.*
23. *The panel noted that Mr Brown had shown some insight, but there had been a serious breach of professional standards. The panel considered that Mr Brown would be able to further reflect and remedy his behaviour despite dishonesty being attitudinal.*
24. *The panel decided that a suspension order was appropriate in this case and that it should be for a period of 6 months to allow Mr Brown to reflect on his behaviour and demonstrate to any future panel that he had remedied his conduct.*
25. *The panel decided that any future panel, when this order is reviewed, would be assisted by Mr Brown:*
 - *Providing a written reflective piece addressing his behaviour and the impact on others.*
 - *Undertaking training on the responsibilities of leadership and the values and standards required of management.*
 - *It would also assist if Mr Brown undertook training in respect of ethical behaviour in the workplace.*
 - *Provision of up to date character testimonials and employment references whether from paid or unpaid work.*
 - *Continued engagement with the regulatory process and attendance at any future hearings.”*

Social Work England submissions:

26. The panel heard submissions from Ms Bonifai as to the background and the previous panel’s findings in relation to impairment and sanction.
27. Ms Bonifai referred this panel to the recommendations by the panel at the final hearing who said that any future panel reviewing the order, would be assisted by Mr Brown adopting and complying with those recommendations.
28. Ms Bonifai submitted that Mr Brown had complied with those recommendations.
29. Ms Bonifai submitted that Mr Brown had provided a reflective piece, details of further training he had completed and also two professional references (though these are personal rather than current employment references).

30. Ms Bonifai informed the panel that the training Mr Brown completed included CPD (3 hours) on “Introduction to Business and Organisational Ethics – Level 1” which he completed on 28 December 2025 and a 10 week Class based course on “Aspiring Leaders in Health and Social Care – Level 5 which he started on 10 September 2026.
31. All of this material was provided in the service and supplementary bundle.
32. Ms Bonifai informed the panel that in light of Mr Brown complying with the previous panel’s recommendations and that he had demonstrated insight and remorse Social Work England took a neutral stance on the review of the final order.
33. Ms Bonifai invited the panel to consider the material submitted by Mr Brown to determine whether it wished to extend the current order or if the panel considered that Mr Brown had remediated sufficiently then it may wish to revoke the current order.

Social worker submissions:

34. Mr Walker, on behalf of Mr Brown, submitted that Mr Brown had complied with all of the recommendations of the final hearing panel and as such invited the panel to permit the current suspension order to lapse when it expired on 7 May 2026.
35. Mr Walker submitted that the risk posed by Mr Brown had been reduced by the insight demonstrated by him in his reflective piece. Mr Walker submitted that Mr Brown had acknowledged the concerns against him and had taken steps to address them.
36. Mr Walker informed the panel that Mr Brown had not been able to provide professional references as he was not currently working due to his personal circumstances.
37. Mr Walker referred the panel to the training courses completed by Mr Brown, which included ethics and the impact of conduct on others.
38. Mr Walker submitted that Mr Brown recognised that he had not followed clear boundaries and this would not occur in the future.
39. Mr Walker submitted that Mr Brown had used the time during his suspension to complete training and demonstrate that he had remediated.
40. Mr Walker submitted that Mr Brown was no longer impaired in accordance with the private and public components.
41. Mr Walker reminded the panel that Social Work England was neutral regarding whether or not there was a requirement for an order to be in place. Social Work England had not submitted that Mr Brown’s practice is currently impaired.
42. Mr Walker submitted that Mr Brown had complied with the recommendations of the final hearing panel and as such his practice was no longer impaired. Mr Walker invited the panel to permit the current order to lapse when it expired.

Panel decision and reasons on current impairment:

43. 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 previous panel. 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'.
44. The panel had regard to all of the documentation before it, including the decision and reasons of the final hearing panel and any new documentation provided by Mr Brown including training certificates and Mr Brown's reflective statement.
45. The panel also took account of the submissions made by Ms Bonifai on behalf of Social Work England and those made by Mr Walker on behalf of Mr Brown.
46. The panel heard and accepted the advice of the legal adviser. The panel was reminded that a social worker's fitness to practise is impaired if they pose a risk to public safety, or if their conduct or performance undermines the confidence the public is entitled to place in all social workers in England. A social worker's fitness to practise may also be impaired if their actions make it necessary to send a public message about the standards expected of social workers.
47. If the panel decided that Mr Brown's practice is currently impaired then it should then consider what sanctions are available and refer to Social Work England's "Sanctions Guidance". The panel must start from the least restrictive sanction. Insight and remediation are important factors.
48. The panel first considered whether Mr Brown's fitness to practise remains impaired.
49. The panel noted that Mr Brown had complied with the recommendations of the final hearing panel and this was to his credit.
50. This panel reflected on whether or not Mr Brown had demonstrated sufficient insight into his behaviour and how he would manage that differently in the future.
51. The panel was concerned that Mr Brown had not considered to a significant degree how his behaviour had impacted on others and the power imbalance between him and his two colleagues.
52. The panel thought that the references provided by Mr Brown were helpful in its decision making and were positive.
53. However, the panel did not consider that Mr Brown had demonstrated a true understanding of what he had done and the impact on others as well as the wider profession. Mr Brown had shown attitudinal failings, which had not been sufficiently addressed in his reflective piece.

54. Mr Brown had not explained what he would do differently in the future or how he would manage himself. The panel decided that Mr Brown had not demonstrated sufficient insight.

55. The panel therefore decided that Mr Brown's fitness to practise is currently impaired.

Decision and reasons:

56. Having found Mr Brown'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.

57. The panel also took into account the 'Impairment and sanctions guidance' published by Social Work England.

58. The panel was mindful that the purpose of any sanction is not to punish Mr Brown, 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 Mr Brown's interests with the public interest.

Take no further action/advice/warning

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

60. Furthermore, none would be insufficient to protect the public, maintain public confidence and uphold the reputation of the profession

Conditions of Practice Order

61. The panel went on to consider a conditions of practice order. The panel took the view that there are no practical or workable conditions that could be applied noting that the concerns identified by this panel related to Mr Brown's insufficient insight and were attitudinal in nature.

Suspension Order

62. Having determined that a conditions of practice order would not be appropriate, the panel then went on to consider if a suspension order would be the most appropriate sanction.

63. The panel concluded that the appropriate sanction is a suspension order. This order would be sufficient to protect the public and the wider public interest, but also provide Mr Brown with the opportunity to reflect upon this panel's concerns and provide him

with the opportunity to address the issues identified at a future final order review hearing.

64. The panel determined that the suspension order should be imposed for a period of six months.
65. The panel was satisfied that this period was appropriate because it would give Mr Brown time to consider this panel's concerns and provide an updated reflective piece to the next review panel to permit him to make an unrestricted return to the register.
66. This panel cannot bind a future panel. However, a future reviewing panel would expect Mr Brown to attend the next review hearing and it would be of assistance to that panel if Mr Brown was able to provide evidence that he had undertaken significant steps that would facilitate a safe and effective return to the register without restriction.
67. This may include a further reflective piece addressing the issues of how Mr Brown would manage himself differently in the future, the impact on others including the power imbalance, how Mr Brown would recognise triggers in the future and what steps he would take to address them.
68. A future panel would also be assisted by Mr Brown explaining what led him to do the things that he did, why he did so, and how this would not occur in the future.

Right of appeal:

69. 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.
70. 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.
71. 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.

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

Review of final orders:

73. 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).

74. 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

75. 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>