



Social worker: Haleema Afzal

Registration number: SW369

Fitness to Practise

Final Order Review Hearing

Date of hearing: 27 April 2026

Hearing venue: Remote

Final order being reviewed:

Conditions of practice order (expiring 8 June 2026)

Hearing outcome:

Conditions of practice order revoked with immediate effect

Introduction and attendees:

1. This is the first review of a final conditions of practice order originally imposed for a period of 18 months by a case examiner decision on 25 October 2024 and due to expire on 8 June 2026.
2. Ms Afzal did attend and was not represented.
3. Social Work England was represented by its case presenter Ms Narayani Panesar-Stringer.
4. The panel of adjudicators conducting this review (hereafter “the panel”) and the other people involved in it were as follows:

Adjudicators	Role
Clive Powell	Chair
Samuel Ana-Amdingo	Social worker adjudicator
Denise Turner	Social worker adjudicator (observing capacity only with permission of the parties)

Hearings team/Legal adviser	Role
Kathryn Tinsley	Hearings officer
Asma Ansar	Hearings support officer
Rochelle Martin	Legal adviser

Service of notice:

5. The chair verified all parties had access and had been able to review the bundles. The panel noted all the documentation presented in support of the final order review hearing including the final review bundle of 164 pages, a service bundle of 11 pages, and a supplementary bundle of 30 pages.
6. Having regard to Rule 15 and all of the information before it in relation to service of the notice the panel was satisfied that the notice of this hearing had been served on Ms Afzal in accordance with Rules 14, 15, 44, 45, and by virtue of her attendance in person remotely at the hearing.

Review of the current order:

7. 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).

8. The purpose of this review is to review the current order, which is due to expire at the end of 8 June 2026. The order subject to review is a conditions of practice order.
9. The conditions of practice, as set out in full at paragraph 21 of this decision, included requirements relating to supervision, reporting, maintenance of a Personal Development Plan, notification of employment changes, and disclosure obligations.

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

10. The regulatory concerns reviewed by the case examiners included:

'RC1: Around/between January 2021 to December 2022 you failed to keep case records and/or reports up to date for one or more service users by:

- 1.1 Not completing/updating plans following Children We Care For (CWCF) reviews.*
- 1.2 Not completing/updating Child Looked After (CLA) Review recommendations.*
- 1.3 Not completing/updating meeting minutes in a timely manner.*
- 1.4 Not completing/updating QA monitoring forms in a timely manner.*
- 1.5 Not completing/updating pathway plans in a timely manner.*
- 1.6 Not completing IRO meetings within statutory timescales.*

RC2: On/around/between March 2022 to April 2022 you failed to safeguard Child M by:

- 2.1 Not completing/maintaining up to date case records and/or reports.*
- 2.2 Not escalating/reporting a disclosure of rape.'*

11. The allegations found proved by the case examiners related to deficiencies in record-keeping and case management, including failures to complete, maintain, and update statutory documentation, care plans, assessments, and records within required timescales while practising in the role of an independent reviewing officer.
12. The case examiners also found proved a further concern relating to a safeguarding matter, involving shortcomings in the recording and escalation of information following a disclosure made by a child. This issue was assessed as an isolated incident and was addressed on the basis of capability rather than misconduct.
13. Taken together, the proved allegations were assessed as demonstrating deficiencies in professional performance at the material time and were determined to amount to current impairment of fitness to practise on the grounds of lack of competence.
14. The case examiners concluded that the public interest would be met by the imposition of a conditions of practice order, on a remedial basis, by way of accepted disposal, without referral to a Fitness to Practise panel.

15. The case examiners noted that the final order was imposed following findings that Ms. Afzal’s fitness to practise was impaired by reason of lack of competence and capability, rather than misconduct.

The case examiners on 25 October 2024 determined the following with regard to impairment:

16. The case examiners concluded that Ms Afzal’s fitness to practise was currently impaired by reason of lack of competence and capability.
17. In reaching that conclusion, the case examiners found that the matters giving rise to the referral demonstrated deficiencies in professional performance at the material time, particularly in relation to record-keeping, case management, and adherence to required processes and timescales.
18. The case examiners also considered a safeguarding concern arising from an isolated incident involving shortcomings in the recording and escalation of information following a disclosure made by a child. This was assessed as a matter of capability rather than misconduct.
19. The case examiners determined that the concerns were remediable, that Ms Afzal had demonstrated insight into the shortcomings identified, and that the public interest could be met without referral to a Fitness to Practise panel.
20. The case examiners therefore concluded that impairment was capable of being addressed through restrictive and remedial conditions, and imposed a conditions of practice order by way of accepted disposal.

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

21. The case examiners concluded that a conditions order was appropriate and noted:

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.

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

3 You must provide reports from your reporter to Social Work England every 3 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.

4. 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.

5. 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.

6. 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.

7. 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].

8. 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. Your workplace supervisor must review your practice at least once every month in one-to-one meetings and/or case-management supervision. These meetings must be focused on all areas of the concerns identified in the conditions (i.e. adhering to timescales, record keeping).

c. 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:

- *completing assessments and supporting documentation to timescales*

11. You must provide a copy of your personal development plan to Social Work England within 12 weeks from the date these conditions take effect and an updated copy 2 weeks prior to any review.

12. You must provide a written copy of your conditions, within 7 days from the date these conditions take effect, to the following parties confirming that your registration is subject to the conditions listed at 1 to 12 above:

a. Any organisation or person employing or contracting with you to undertake social work services whether paid or voluntary.

b. 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).

c. 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).

d. 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.

13. You must permit Social Work England to disclose the above conditions, 1 to 12, to any person requesting information about your registration status.'

Social Work England submissions:

22. The panel heard submissions from Ms Panesar-Stringer as to the background and the previous panel's findings in relation to impairment and sanction.
23. Ms Panesar-Stringer reminded the panel that Social Work England's position has evolved during the course of these proceedings and that Social Work England had initially sought a further extension of the conditions of practice order for a period of 12 months. However, following receipt of the supplementary bundle and the updated evidence from Ms Afzal's manager, Social Work England has revised its position.
24. In light of that updated evidence, the panel is now invited to consider either:
- a shorter extension of the conditions of practice order, in the range of 6 to 9 months, or

- revocation of the conditions of practice order, should the panel conclude that Ms Afzal’s fitness to practise is no longer impaired.

25. Ms Panesar-Stringer reminded the panel that the final decision rests with the panel, applying the test for impairment and the principles of proportionality she had outlined.

Social worker submissions:

26. Ms Afzal has not submitted any advance written submissions. However, she has provided correspondence and evidential material, including her manager’s reports and an updated PDP, which are before the panel.

27. Ms Afzal provided oral submissions to the panel.

28. At the outset of her submissions, Ms Afzal began to refer to aspects of the original concerns which led to the imposition of the conditions of practice order. The chair reminded Ms Afzal that the purpose of the present hearing, under the framework of Social Work England, is to consider her current fitness to practise, rather than to revisit the original findings.

29. Following this clarification, Ms Afzal addressed the panel in relation to her development since the imposition of the order, and put forward she has taken action that included:

- Utilised regular supervision effectively, including fortnightly formal supervision sessions as well as additional interim discussions, to maintain open dialogue and seek guidance where required;
- Sought and made use of the support of a Senior Practitioner, particularly in relation to complex cases and decision-making;
- Improved her organisation and time management, including maintaining a structured and up-to-date diary to better manage competing demands;
- Established a routine of two office-based days per week (Wednesday and Friday), which she uses as dedicated administrative time to ensure that recordings are completed promptly and to enable direct, in-person access to managerial support;
- Engaged in reflective practice, including consideration of the factors which contributed to the concerns in her practice at an early stage in her career. She stated that she has taken personal responsibility and accountability for her development, including through journalling, reviewing professional literature, and refining her report writing. She explained that she has moved away from producing overly lengthy reports and is now focusing on being clear, analytical, and succinct, which has enabled her to manage a broader caseload more effectively;

- Recognised the importance of consistently applying learning, including making ongoing use of managerial support and reflection to sustain improvements in her practice; and

30. Ms Afzal highlighted that her employer has offered her a permanent position, having previously been engaged as an agency worker. She noted that the organisation is rated “Good” by Ofsted and operates to a high standard, and submitted that she would not have been offered a permanent role had there been any significant concerns regarding her practice.

31. The panel asked Ms Afzal whether she had undertaken any training supported by formal certification. In response, Ms Afzal confirmed that she has completed a number of training courses and professional development activities. She explained that she did not have the certificates available at the hearing but indicated that these could be provided if required.

Legal advice to panel:

32. The legal adviser reminded the panel that this was a review of a conditions of practice order under paragraph 15 of Schedule 2 of The Social Workers Regulations 2018, and that its task was not to go behind the findings of the substantive panel but to determine whether Ms Afzal’s fitness to practise remains impaired as at the date of the review.

33. The panel was advised that it must first determine whether Ms Afzal’s fitness to practise is currently impaired in accordance with Blake J in *Abrahaem v General Medical Council [2008] EWHC 183*, noting that this is a forward-looking assessment based on the present position. The panel was reminded that it should not consider sanction unless it first finds impairment.

34. The panel was further advised to consider whether the concerns which led to the original finding of impairment have been sufficiently addressed, having regard to Ms Afzal’s remediation, insight, and the risk of repetition. In doing so, the panel was entitled to expect evidence demonstrating that any deficiencies have been acknowledged, remedied, and that improvements are sustained.

35. The panel was advised that impairment requires consideration of both the personal component and the public component, with reference to *Council for Healthcare Regulatory Excellence v NMC and Grant [2011] EWHC 927* and *Cohen v General Medical Council [2008] EWHC 581*.

36. The panel was also advised that, in practical terms, there is a persuasive burden on the social worker at a review hearing to demonstrate that their fitness to practise is no longer impaired, as set out in *Abrahaem v General Medical Council [2008] EWHC 183*.

37. If impairment were found, the panel was advised to consider sanction in accordance with the principle of proportionality, taking the least restrictive option necessary, and

having regard to the need to maintain public confidence, as outlined in *Bolton v Law Society* [1994] 1 WLR 512.

38. The panel was advised that if it found that Ms Afzal's fitness to practise is no longer impaired, the appropriate course would ordinarily be to revoke the order.
39. The panel accepted the advice of the legal adviser and also accepted that it must provide clear and reasoned findings for its decision.

Panel decision and reasons on current impairment:

40. In considering the question of current impairment, the panel undertook a comprehensive review of the case examiners' decision and the recent reports provided by Ms Afzal's manager. 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.
41. The panel considered whether Ms Afzal's fitness to practise remains impaired by reason of the matters which led to the imposition of the conditions of practice order.
42. The panel reminded itself that this is a review hearing, and therefore a forward-looking exercise, as set out in *Abrahaem v General Medical Council* [2008] EWHC 183. The panel also had regard to the principles in *Cohen v General Medical Council* [2008] EWHC 581 in considering remediation and the risk of repetition.
43. The panel had careful regard to the evidence before it, including:
 - The report from Ms Afzal's current employer;
 - The indication that Ms Afzal has been offered a permanent position within the team;
 - Evidence that Ms Afzal has remained in continuous employment throughout the period of the order;
 - Ms Afzal's own reflections and updates; and
 - Ms Afzal's manager's assessment that any previous concerns, including issues relating to timeliness of reports, are now minor and do not raise substantive concerns about practice.
44. The panel found the employer's report to be credible, balanced, and persuasive, noting that it was based on direct supervision within a structured working environment. The panel placed significant weight on the manager's view that Ms Afzal is fit to practise.
45. The panel further noted that Ms Afzal has engaged fully with the regulatory process and has complied with the conditions of practice order over a sustained period. Whilst the panel acknowledged that it may have been helpful to have documentary evidence of completed training, it did not consider the absence of such certificates to be

determinative, particularly in light of the strong employer evidence demonstrating safe and effective practice.

Impairment – Personal Component

46. In light of the above, the panel determined that Ms Afzal’s fitness to practise is not impaired on the personal component.
47. The panel was satisfied that Ms Afzal has demonstrated sufficient remediation, insight through engagement, and that the risk of repetition is low.

Impairment – Public Component

48. The panel went on to consider the public component, including the need to maintain public confidence in the profession and uphold proper standards.
49. The panel noted:
 - Ms Afzal’s full engagement with the regulatory process;
 - The length of time over which the conditions of practice order has been complied with;
 - The positive and credible employer evidence confirming current fitness to practise; and
 - That Ms Afzal is now practising at a satisfactory and safe level, meeting professional standards.
50. The panel considered that a well-informed member of the public would be reassured by:
 - The regulatory process having been followed;
 - Ms Afzal having complied with the order; and
 - The clear evidence of improvement and current competence.

51. The panel therefore concluded that a finding of impairment is not required to maintain public confidence or uphold professional standards.

Conclusion on Impairment

52. Accordingly, the panel determined that Ms Afzal’s fitness to practise is no longer impaired, on both the personal and public components.

Remediation and risk of repetition

53. The panel was satisfied that the concerns which led to the original order were capable of remediation, and that Ms Afzal has remediated those concerns in practice.
54. The panel found that:
 - Ms Afzal has demonstrated safe and effective practice over time;

- Any previous concerns have reduced to a low-level and non-regulatory nature;
- Ms Afzal has benefited from a structured and supportive working environment; and
- There is a low risk of repetition.

55. The panel considered that the Ms Afzal’s progress has not only been sustained but has improved over time, indicating meaningful remediation.

Decision held

56. The panel had regard to all of the documentation before it, including the decision and reasons of the case examiners. The panel also took account of the submissions made by Ms Panesar-Stringer on behalf of Social Work England and those made by Ms Afzal.

57. The panel heard and accepted the advice of the legal adviser. In reaching its decision, the panel was mindful of the need to protect the public and the wider public interest in declaring and upholding proper standards of behaviour and maintain public confidence in the profession.

58. The panel considered whether a finding of impairment remained necessary to maintain public confidence in the profession and uphold proper professional standards. The panel considered that public confidence has been satisfied by the remedial action undertaken and the passage of time since. The panel concluded that Ms Afzal’s fitness to practise is no longer impaired on either the personal or wider public interest components.

59. Accordingly, the panel concluded that the appropriate and proportionate course is to revoke the conditions of practice order with immediate effect.

The Professional Standards Authority

60. 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>