

Social worker: Melissa Renahan

Registration number: SW100345

Fitness to Practise

Final Order Review Meeting

Date of meeting: 17 August 2026

Meeting venue: Remote Meeting

Final order being reviewed:

Suspension order (expiring 27 September 2026)

Meeting outcome: Impose a new order namely a removal order with effect from the expiry of the current order.

Introduction and attendees:

1. This is the second review of a final order which was originally imposed on 18 August 2024, by way of an accepted disposal, as a Conditions of Practice Order for a period of 18 months. That order was reviewed on 28 May 2025 and replaced by a Suspension Order for a period of sixteen months.
2. Ms Renahan did not attend and was not represented.
3. Social Work England was not represented at this review because it was listed as a meeting. The Panel of adjudicators (the Panel) had before it:
 - a. the written submissions of Social Work England set out in a notice of hearing dated 1 July 2026;
 - b. An email from Social Work England setting out the relevant law and guidance;
 - c. A bundle of documents containing the agreed disposal and the first review referred to above.
 - d. The final review service bundle.
4. The Panel refers to those documents where appropriate below.
5. The Panel of adjudicators conducting this review (hereafter “the Panel”) and the other people involved in it were as follows:

Adjudicators	Role
Zulfiqar Sher	Chair
David Childs	Social worker adjudicator

Hearings team/Legal adviser	Role
Andrew Brown	Hearings officer
Anne Briggs	Hearings support officer
Andrew Lewis	Legal adviser

Service of notice:

6. 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 1 July 2026 and addressed to Ms Renahan at their email address which they provided to Social Work England (with a copy to A third party she had identified to the HCPC as someone who should receive correspondence sent to her.);
 - An extract from the Social Work England Register as of 1 July 2026 detailing Ms Renahan’s registered address;

- A copy of a signed statement of service, on behalf of Social Work England, confirming that on 1 July 2026 the writer sent by email to Ms Renahan at the address referred to above and a copy to the third party referred to above: notice of hearing and related documents;
7. A printout from Outlook.com, confirming that both emails had been delivered to the above email addresses.
 8. The Panel accepted the advice of the legal adviser in relation to service of notice.
 9. Having had regard to the Social Work England (Fitness to Practise) Rules 2019 (as amended) (“the Rules”) and all 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 Renahan in accordance with Rules 14, 15, 44 and 45 of the Rules.

Proceeding with the interim order review as a meeting:

10. The Panel saw that the notice of interim order review hearing informed Ms Renahan that the review would take place electronically. 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 15 July 2026. 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 received no information to suggest that Ms Renahan has indicated that she would like to attend today’s review. The Panel accepted that there was no evidence that Mr Rehman had responded to any correspondence sent to her except to say on the telephone on 21 August 2024, that *“she never wanted to be a social worker again, that she dreaded receiving correspondence from Social Work England, and that she would continue to not engage.”*

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. Accordingly, the Panel was satisfied that it is entitled to conduct the review in the form of a meeting in accordance with Rule 16(c).
14. The Panel then considered whether it should exercise its discretion to conduct the review by means of a meeting. The Panel accepted the advice of the legal adviser in relation to the factors it should take into account when deciding whether it was fair and appropriate to conduct the review at a meeting in the absence of Ms Renahan. This included the Social Work England’s guidance ‘Service of notices and proceeding in the

absence of the social worker' and the guidance given to panels by the decision of the *House of Lords in R v Jones* [2002] UKHL 5 and the further guidance given to panels by the Court of Appeal in *GMC v Adeogba* [2016] EWCA Civ 162, endorsed in *Sanusi v GMC* [2019] EWCA Civ 1172. These include the following:

- The discretion to continue in the absence of the social worker should be exercised with great caution and with close regard to the fairness of the proceedings.
- The decision about whether or not to proceed must be guided by Social Work England's primary objective of protecting the public.
- Fairness to the social worker is very important, but so is fairness to Social Work England and the public.
- Whether all reasonable efforts have been taken to serve the social worker with notice.
- The Panel should consider the nature of the social worker's absence and in particular whether it was voluntary.
- Whether there is any reason to believe the social worker would attend or make submissions at a subsequent hearing.
- The duty of professionals to engage with their regulator.
- There must be an end to the "adjournment culture".

15. The Panel had regard to the direction given by the Court of Appeal in *Adeogba* (above) *"Where there is good reason not to proceed, the case should be adjourned; where there is not, however, it is only right that it should proceed."*

16. The Panel noted that:

- a. Ms Renehan had not indicated she wishes to make written submissions or attend to make submissions;
- b. Ms Rehehan has indicated in the past that she no longer wishes to engage with Social Work England;
- c. There is no material before the Panel that indicates that an adjournment would secure the attendance of Ms Renehan in the future;
- d. The review is a mandatory review of a final order that will expire if not reviewed;
- e. There is a public interest in reviewing the order to ensure the protection of the public.

17. The Panel reminded itself that there is always a potential disadvantage to a social worker in not attending, but was satisfied that in this case the disadvantage must be set against the reason for Ms Renehan's absence and is outweighed by the public interest in the expeditious disposal of this mandatory review of an interim order.

18. Having regard to all these matters, the Panel concluded that Ms Renehan had waived her right to attend this review.
19. The Panel was also satisfied that it did not require any further information or assistance from Social Work England in order to discharge its duty apart from the written submissions on the law, to which the Panel has referred above
20. Accordingly, the Panel was satisfied that it would be fair and appropriate to conduct the review in the form of a meeting, in the absence of Ms Renehan and a representative of Social Work England, in accordance with Rule 16(c).

Review of the current order:

21. 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).
22. Under paragraph 15 (1) the Panels powers are as follows` :
 - (a) confirm the order,
 - (b) extend, or further extend, the period for which the order has effect, provided that the extended period does not exceed
 - (i) in the case of a suspension or a conditions of practice order, three years; or
 - (ii) in the case of a warning order, five years,
 - (c) reduce the period for which the order has effect, but in the case of a warning order, not so that it has effect for less than one year beginning on the date when the order was made,
 - (d) substitute any order which the adjudicators or the case examiners could have made on the date on which they made the order,
 - (e) revoke the order, and in the case of a suspension order may make the revocation subject to the social worker satisfying such requirements as to additional education or training and experience as apply to them,
 - (f) revoke or vary any condition imposed by the order.

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

23. Whilst registered as a social worker between 17 July 2023 and 16 October 2023, you:
 1. Did not maintain accurate and up to date records.
 2. Did not inform the local authority social worker about identified risks relating to foster children, despite being instructed by management to do so.

The matter outlined in regulatory concern 1 and/or 2 amount to the statutory ground of lack of competence or capability.

Your fitness to practise is impaired by reason of lack of competence or capability

The case examiners determined the following with regard to impairment:

24. The case examiners found that the concerns in this case had been raised across Ms Renahan's entire case load of ten fostering households, and for the entire period that she was employed by the fostering agency. They referred to evidence from within the probation review case report and minutes of the meeting held with Ms Renahan which suggested that Ms Renahan struggled to manage to upload records onto the case management system, claiming that this was due to time pressures across their case load. Also, within the probation review meeting on 9 October 2023, whilst Ms Renahan appeared to have general understanding of what needed to be recorded, she stated that she was 'not 100% sure, and different people said different things.'
25. In respect of the personal element of impairment the case examiners noted that similar matters to the concerns raised in this case had been raised by a previous employer and Ms Renahan had been placed on a performance improvement plan by that employer but had resigned before completing the plan. The case examiners considered that this suggested that there may be a pattern of conduct. Ms Renahan had not provided any submissions to the regulator. Therefore, the case examiners had no evidence of insight or remorse or of any remediation. Given Ms Renahan's non-engagement with the regulator, the case examiners noted that their ability to assess her insight was limited. In these circumstances the case examiners concluded that the risk of repetition was high.
26. In respect of the public element of impairment the case examiners considered the need to uphold proper standards of conduct and behaviour and the need to maintain the public's trust and confidence in the profession. The case examiners concluded that members of the public would be concerned where a social worker has struggled to maintain their caseload and record accurately, or at all in some cases, the work that they have undertaken with families and would expect a finding of impairment.

The case examiners determined the following with regard to sanction:

27. In respect of sanction the case examiners were of the view that Ms Renahan continued to pose some current risk to public safety as there was insufficient evidence of her having developed insight into her lack of competence and, as she was not currently in employment, she had been unable to demonstrate that she could practise safely. Accordingly, the case examiners concluded that no further action, advice or warnings would be inappropriate as they would not sufficiently protect the public.
28. The case examiners concluded that a conditions of practice order was the appropriate and proportionate outcome, which would provide Ms Renahan with a supportive framework to return to practice whilst also protecting the public. The case examiners

decided that a period of 18 months would allow Ms Renahan to demonstrate, over a sustained period, that she had reached the standards required of social workers.

The early review on 28 May 2025

29. At the early review referred to above, the Review Panel found that Ms Renahan had not engaged with the conditions imposed, including the writing of a reflective piece for which she did not need to be employed.
30. The Review Panel also set out the extent to which Ms Renahan had disengaged from the regulatory process. The Panel sets this finding out in full because it found that it was important to its approach to this review.
31. The Review Panel heard *“details of a telephone conversation on 21 August 2024 between Ms Renahan and a Social Work England case review officer in which Ms Renahan stated that she wants ‘all of this over’ and that she dreads getting correspondence from Social Work England. Ms. Renahan said that she never wants to be a social worker again and there is nothing that would make her want to go back to social work. The case review officer asked if there was anything they could do to help in respect of communications. Ms Renahan said she understood she needed to be sent standard communications, and it was agreed that a friend of Ms Renahan who had been supporting her should be copied into future correspondence from Social Work England.*
32. *The case review officer mentioned voluntary removal and offered to send Ms Renahan the relevant guidance. The case review officer also explained that although Ms Renahan was not currently working as a social worker her conditions still apply although most of them will not be in effect. The case worker referred to condition 15, which requires a written reflection to be submitted by 19 February 2025, explaining to Ms Renahan that even though she is not in employment she must comply with this condition. Ms Renahan said she understood that she had this reflection to do, and to fill out the voluntary removal form because she wants to be considered for removal from the register. She also stated that even if the application is refused, she will continue to not engage and that her stance is not ever going to change.*
33. *On 27 August 2024 Ms Renahan’s friend emailed Social Work England to ask whether the reflective piece which Ms Renahan was due to complete by February 2025 was a legal requirement and was it enforceable, commenting that it seems ludicrous that she was being asked to complete a piece of work for a role which she no longer works in and has no desire to work in again.*
34. The Panel noted that since August 2024 the only further communication from Ms Renahan to Social Work England was a voice mail left for the case review officer on 20 February 2025 in which Ms Renahan asked the case review officer to ring her back when she gets the message. The case review officer rang back the following morning but there was no answer, and they left a voice message and sent an email to Ms Renahan asking her to make contact if she would like to arrange a call.
35. Ms Renahan did not make any submissions to the first Review Panel.

36. The first Review Panel concluded that there was nothing before it to demonstrate that Ms. Renahan's fitness to practise was no longer impaired. With regard to sanction, the Review Panel concluded that, "although Ms. Renahan's deficiencies are potentially capable of being remedied, this is dependent on her willingness to engage with remediation and comply with conditions."
37. The Review Panel concluded that a conditions of practice order was no longer practical. It also observed that it could not impose a removal order because Ms Renahan had not been subject to a final order for a continuous period of two years.
38. Accordingly, the Review Panel posed a suspension order for a period of 16 months. It reminded Ms Renahan that if she did not engage, a future reviewing panel would be able to impose a removal order.
39. At this review, the Panel received the written submissions of Social Work England as follows:

"The proposed action Social Work England is seeking a Removal Order.

Social Work England's submissions In summary, on behalf of Social Work England we submit that:

Subject to any evidence of insight or remediation provided by the social worker, Social Work England invites the Panel to find that the social worker's fitness to practise remains impaired, and a Removal Order is now the most appropriate order.

Since the previous review, Social Work England has not received any evidence which demonstrates insight and remediation, or any communication, from the social worker to date. Although the concerns remain remediable, the absence of such evidence means that the Panel cannot be satisfied that the social worker has successfully addressed the concerns identified by the Case Examiners. As such, it is submitted that this means that the risk of repetition remains and therefore, a finding of impairment remains necessary to protect the public and wider public interest.

A Removal Order will be available to the Panel at the review hearing as the social worker will have been subject to the Final Order for over two years. Social Work England submits that such an order is the most appropriate order at this stage.

The previous Panel confirmed that a period of 16 months would allow the social worker to consider whether she wished to return to the profession, and if so to engage with the order and provide evidence of remediation and insight, as well as to enable a future reviewing Panel to consider imposing a Removal Order.

Social Work England submits that there has been no change in circumstances since the previous review of the order. In August 2024, the social worker confirmed that she never wanted to be a social worker again, that she dreaded

receiving correspondence from Social Work England, and that she would continue to not engage.

It is submitted that there continues to be a lack of engagement from the social worker. As such, there would be no benefit in extending the current order. Furthermore, it would be contrary to the public interest to maintain an order where there is clear evidence of prolonged disengagement and no desire to return to the profession.

40. The Panel received no submissions from Ms. Renahan, but reminded itself of the material that had been placed before the first Review Panel.
41. The Panel heard and accepted the advice of the legal adviser, which it has followed in its decision.

The Panel's approach

42. The Panel first reminded itself of its powers under Paragraph 15 of schedule 2, part 5 of the Social Worker Regulations 2018 to extend the period for which the order has effect or impose any order the first panel could have imposed, effective from the expiry of the current order. It could also revoke the current order with immediate effect.
43. It reminded itself of the importance of a review hearing, described by the Supreme Court in *Khan v GPhC [2016] UKSC 64* as “the ‘teeth’ behind the sanctions other than erasure and should focus the [doctor’s] mind on the need to undertake any necessary remediation”.
44. It followed the ordered sequence of decision making set out by Blake J in *Abrahaem v General Medical Council [2008] EWHC 183*:
- i. address whether the fitness to practise is impaired before considering conditions.
 - ii. whether all the concerns raised in the original finding of impairment have been sufficiently addressed to the Panel's satisfaction.
 - iii. 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.
45. It bore in mind the guidance given to Panels by the Supreme Court in *Khan* (above), to focus on the Registrant’s current fitness to practise:

“The guidance therefore makes clear that the focus of a review is upon the current fitness of the registrant to resume practice, judged in the light of what he has, or has not, achieved since the date of the suspension. The review

committee will note the particular concerns articulated by the original committee and seek to discern what steps, if any, the registrant has taken to allay them during the period of his suspension."

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

- a. to protect, promote and maintain the health, safety and well-being of the public;
- b. to promote and maintain public confidence in the profession regulated under this Order; and
- c. to promote and maintain proper professional standards of conduct for members of the profession.

47. It also bore in mind that in deciding whether the Registrant's fitness to practise is still impaired it should follow the approach of Dame Janet Smith endorsed by the High Court in *CHRE v NMC and P Grant* [2011] EWHC 927 (Admin): "*Do our findings of fact in respect of the (registrant's) misconduct, deficient professional performance, adverse health, conviction, caution or determination show that his/her fitness to practise is impaired in the sense that s/he:*

- 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 theprofession 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 medical profession; and/or*
- d. *has in the past acted dishonestly and/or is liable to act dishonestly in the future."*

48. The Panel also Had regard to paragraph 218 of the Impairment and sanctions guidance (the Guidance) which provides that, "A social worker must not be allowed to resume unrestricted practice unless the decision makers are satisfied their fitness to practise is no longer impaired."

The Panel's decision

49. The Panel reminded itself that Ms Renahan had not provided any material to Social Work England since 2024. It concluded that there was no material before the Panel capable of satisfying it that Ms Renahan's fitness to practise was no longer impaired.

50. Accordingly, the Panel concluded that Ms. Renahan's fitness to practise remains impaired, on the grounds that there remains an unacceptable risk that she would put service users at unwarranted risk of harm.
51. Panel then considered what, if any, sanction to impose upon Ms Renahan. It agreed with the reasoning of the first Review Panel that no sanction less restrictive than conditions would be sufficient to protect the public, because it would place no restriction upon Miss Renahan's ability to practise unrestricted.
52. The Panel also agreed with the first Review Panel that a conditions of practice order was not practical in circumstances where Ms Renahan had completely disengaged from the process and made it clear that she had no intention of engaging in the future.
53. The Panel then considered whether a suspension order was still sufficient to protect the public. He was satisfied that it would protect the public in the short term by preventing Ms Renahan from practising as a social worker.
54. Nevertheless, the Panel had regard to paragraph 138 of the Guidance which provided that: "Suspension is likely to be unsuitable in circumstances where (both of the following):
- a. *the social worker has not demonstrated any insight and remediation*
 - b. *there is limited evidence to suggest they are willing (or able) to resolve or remediate their failings.*
55. In those circumstances, the Panel found that a suspension order, although sufficient to protect the public in the short term, would not be sufficient to satisfy the wider public interest of maintaining confidence in the profession of the public. The Panel concluded that an informed member of the public would lose confidence in the profession and its regulator if they knew that a social worker would be suspended and entitled to periodic reviews, even though they had disengaged and made it clear they had no intention of returning to the profession.
56. Accordingly, the Panel considered whether a removal order was available to the Panel. The Panel proceeded with particular care because paragraph 150 of the guidance provides that, in a case of lack of competence or capability, a removal order can only be made if the social worker's registration has been subject to a final order. *"continuously for at least 2 years leading up to the making of the removal order. The time a social worker has spent subject to an interim order does not count towards this time period"*
57. Having regard to the uncertainty of precisely when the order began, the Panel was not initially confident that at today's date, Ms Renahan had been subject to a final order for at least two years.
58. Having received written submissions on the law and accepted the advice of the Legal Advisor, the Panel had regard to paragraph 13(2) of the Regulations which provides that

a panel can impose a removal order in a case based upon lack of competence if satisfied that, *“the social worker was either suspended from practice, or subject to a conditions of practice order, or a combination of both, for a continuous period of two years immediately preceding the day when the removal order took effect.”*

59. The Panel observed that the current order did not expire until 27 September 2026, and this was more than two years after the order took effect, whether the order took effect on the day it was made or even 28 days later.
60. The Panel observed that the provision in the guidance purported to be based upon the passage in the Regulations set out above. In those circumstances, panel concluded that it should apply the plain words of the Regulations rather than the paragraph of the Guidance set out above.
61. The Panel considered whether there would be any unfairness to Ms. Renahan, in following a course that is not, on the face of it, provided for in the Guidance. The Panel concluded that there was not, because she had been informed in the Notice of Hearing that a removal order was available to this panel.
62. Accordingly, the Panel considered whether it should impose a removal order in this case. The Panel approached this question with caution because the matters which gave rise to the suspension order under review were not the most serious and were, on the face of it, capable of remediation.
63. Nevertheless, the Panel concluded, with considerable sadness, but no doubt, that a further period of suspension was futile and risked undermining public confidence in the profession and the regulator.
64. Accordingly imposed a removal order, which will become effective when the current order of suspension expires.

Right of appeal:

65. 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.

66. 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.
67. 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.
68. This notice is served in accordance with Rules 44 and 45 of the Fitness to Practise Rules 2019 (as amended).

The Professional Standards Authority

69. 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>