

**Nursing and Midwifery Council  
Fitness to Practise Committee**

**Substantive Meeting  
Friday, 5 July 2024**

Virtual Meeting

**Name of Registrant:** Rebecca Dickens

**NMC PIN:** 15C1652E

**Part(s) of the register:** Registered Nurse – Sub Part 1  
Adult Nursing – November 2017

**Relevant Location:** Lancashire

**Type of case:** Misconduct and Conviction

**Panel members:** Derek McFaull (Chair, lay member)  
Pamela Campbell (Registrant member)  
David Anderson (Lay member)

**Legal Assessor:** Lachlan Wilson

**Hearings Coordinator:** Yewande Oluwalana

**Facts proved by admission:** Charges 2a, 2b, 2c, 2d and 3

**Facts proved:** Charge 1

**Facts not proved:** N/A

**Fitness to practise:** Impaired

**Sanction:** Striking-off order

**Interim order:** Interim suspension order (18 months)

## **Decision and reasons on service of Notice of Meeting**

The panel was informed at the start of this meeting that that the Notice of Meeting had been sent to Miss Dickens' registered email address by secure email on 31 May 2024.

The panel accepted the advice of the legal assessor.

The panel took into account that the Notice of Meeting provided details of the allegation, the time, date and the fact that this meeting was heard virtually.

In the light of all of the information available, the panel was satisfied that Miss Dickens has been served with notice of this meeting in accordance with the requirements of Rules 11A and 34 of the 'Nursing and Midwifery Council (Fitness to Practise) Rules 2004', as amended (the Rules).

## **Details of charge**

That you, a registered nurse:

- 2) On or around 13 September 2022 in relation to Resident A's Morphine medication:
  - a. Did not administer it to them as required
  - b. Signed the administration and stock control record chart to say the medication had been administered to them when it had not been
  - c. Counter signed the administration and stock control record chart with Colleague A's signature stating it had been administered when it had not been
  - d. Took the medication meant for them for your own purposes
  
- 3) Your conduct in charges 2 a) and/or 2 b) above was dishonest as you intended to induce others to believe that the medication had been properly administered to resident A when it had not.

AND in light of the above, your fitness to practise is impaired by reason of your misconduct.

## **Background**

On 16 September 2022, the Nursing and Midwifery Council (NMC) received a referral from the Director of Nursing at HC-One, the care home operator. The charges arose whilst Miss Dickens was employed as a Registered Nurse working at [PRIVATE] Care Home ('the Home').

On or around 13 September 2022, and or on more than one occasion whilst Miss Dickens worked at the Home, it is alleged that she removed/stole five Morphine Ampoules for her own private use.

It is further alleged that on or around 13 September 2022, Miss Dickens forged the signature of Colleague A in relation to checking for the administering of Morphine to a resident. Miss Dickens at local level admitted to not administering the Morphine to Resident A and instead used the Morphine for her own private use and further admitted to taking five Morphine Ampoules that had gone missing from the stock cupboard.

On 15 September 2022, staff noted that the Control Drug (CD) Book had been tampered with and later that morning a colleague received a WhatsApp message from Miss Dickens asking her to destroy all the CD's as she had tampered with them, and this included all the medication [PRIVATE].

Miss Dickens was suspended pending investigation, and the matter was referred to the Police.

## **Decision and reasons on facts**

At the outset of the meeting, the panel noted the completed Case Management Form (CMF) dated 29 November 2023 from Miss Dickens. Miss Dickens in the CMF ticked that she admitted to all the charges.

The panel examined the NMC evidence provided which included statements from Colleague B and Colleague C and their exhibits. It was satisfied that the evidence provided corroborated the facts admitted by Miss Dickens.

The panel therefore finds charges 2a, 2b, 2c, 2d and 3 proved in their entirety, by way of Miss Dickens' admissions.

### **Fitness to practise**

Having reached its determination on the facts of this case, the panel then moved on to consider, whether the facts found proved amount to misconduct and, if so, whether Miss Dickens' fitness to practise is currently impaired. There is no statutory definition of fitness to practise. However, the NMC has defined fitness to practise as a registrant's ability to practise kindly, safely and professionally.

The panel, in reaching its decision, has recognised its statutory duty to protect the public and maintain public confidence in the profession. Further, it bore in mind that there is no burden or standard of proof at this stage and it has therefore exercised its own professional judgement.

The panel adopted a two-stage process in its consideration. First, the panel must determine whether the facts found proved amount to misconduct. Secondly, only if the facts found proved amount to misconduct, the panel must decide whether, in all the circumstances, Miss Dickens' fitness to practise is currently impaired as a result of that misconduct.

### **Representations on misconduct and impairment**

In coming to its decision, the panel had regard to the case of *Roylance v GMC (No. 2)* [2000] 1 AC 311 which defines misconduct as a '*word of general effect, involving some act or omission which falls short of what would be proper in the circumstances.*'

The NMC invited the panel to take the view that the facts found proved amount to misconduct. The panel had regard to the terms of 'The Code: Professional standards of practice and behaviour for nurses and midwives (2015' ("the Code") in making its decision.

The NMC identified the specific, relevant standards where Miss Dickens' actions amounted to misconduct:

***'20 Uphold the reputation of your profession at all times***

*To achieve this, you must:*

*20.1 keep to and uphold the standards and values set out in the Code*

*20.2 act with honesty and integrity at all times,*

*20.3 be aware at all times of how your behaviour can affect and influence the behaviour of other people'*

The NMC submitted that Miss Dickens' conduct as detailed in the charges above have fallen far short of what is and would be expected of a registered professional. Her conduct would be seen as deplorable by her fellow practitioners and would seriously damage the trust that the public places in the profession.

The NMC requires the panel to bear in mind its overarching objective to protect the public and the wider public interest. This included the need to declare and maintain proper standards and maintain public confidence in the profession and in the NMC as a regulatory body. The panel was referred to the cases of *Council for Healthcare Regulatory Excellence v (1) Nursing and Midwifery Council (2) Grant* [2011] EWHC 927 (Admin) and *Cohen v General Medical Council* [2008] EWHC 581 (Admin).

The NMC invited the panel to find Miss Dickens' fitness to practise impaired on both public protection and public interest grounds. It was noted in Miss Dickens' completed CMF dated 29 November 2023 that she indicated that her fitness to practise is impaired. She also stated:

*[PRIVATE].*

The NMC submitted that regarding the four questions outlined in Dame Janet Smith's test, questions b, c and d can be answered in the affirmative in this case. It submitted that Miss Dickens has brought the profession into disrepute by the very nature of the conduct she has displayed. Nurses occupy a position of trust and must act with and promote integrity at all times. Professionalism and integrity are fundamental tenets of the profession that have been breached in this case. The public has the right to expect high standards of registered professionals. The seriousness of Miss Dickens' conduct, calls into question her professionalism and trustworthiness in the workplace as she took on more than one

occasion a controlled drug that was prescribed for a resident for her own personal use, leaving the resident without their prescribed medication, which could have put Resident A at risk of harm, forged Colleague A's signature and did so with the intention to make other staff members believe that the medication had been properly administered to Resident A when it had not been given at all. This therefore has a negative impact on the reputation of the profession and, accordingly, has brought the profession into disrepute.

The NMC reminded the panel that impairment is a forward-thinking exercise which looks at the risk the registrant's practice poses in the future. The NMC Guidance adopts the approach of Silber J in the case of *Cohen* by asking whether the concern is easily remediable, whether it has in fact been remedied and whether it is highly unlikely to be repeated.

The NMC submitted that although Miss Dickens made full admissions at local level, she had also admitted all of the charges and that her fitness to practice is impaired. It considered that Miss Dickens has not provided any meaningful insight into her actions that led to the misconduct. The NMC submitted that there is a continuing risk to the public due to the severity of the concerns and the fact that the concerns are more difficult to put right. The Guidance states that generally, there are certain concerns that are more difficult to put right and often mean that the nurse, midwife or nursing associate's right to practice needs to be restricted.

The NMC said that Miss Dickens' conduct can be deemed to be particularly serious and also calls into question her trustworthiness as a registered professional. Further NMC Guidance states that concerns surrounding dishonesty should be taken very seriously as they can suggest underlying attitudinal concerns.

The NMC submitted that a finding of impairment is also essential to maintain public confidence in the profession. In light of this and the fact that her conduct could seriously damage the reputation of the profession, it is submitted that a finding of impairment is necessary on public interest and public protection grounds.

The panel accepted the advice of the legal assessor.

## **Decision and reasons on misconduct**

When determining whether the facts found proved amount to misconduct, the panel had regard to the terms of the Code.

The panel was of the view that Miss Dickens' actions did fall significantly short of the standards expected of a registered nurse, and that Miss Dickens' actions amounted to a breach of the Code. Specifically:

*'10.3 complete all records accurately and without any falsification, taking immediate and appropriate action if you become aware that someone has not kept to these requirements*

*18.3 make sure that the care or treatment you advise on, prescribe, supply, dispense or administer for each person is compatible with any other care or treatment they are receiving, including (where possible) over-the-counter medicines.*

### **20 Uphold the reputation of your profession at all times**

*20.1 keep to and uphold the standards and values set out in the Code*

*20.2 act with honesty and integrity at all times,*

*20.3 be aware at all times of how your behaviour can affect and influence the behaviour of other people'*

The panel appreciated that breaches of the Code do not automatically result in a finding of misconduct. However, the panel was of the view that Miss Dickens' conduct would be considered deplorable by fellow nurses. Miss Dickens was dishonest in that she falsified records and tampered with the CD book, forged the signature of Colleague A and took Morphine for her own personal use. The panel found that her actions were at the serious end of the spectrum for dishonesty.

The panel found that Miss Dickens' actions did fall seriously short of the conduct and standards expected of a nurse and amounted to misconduct.

## Conviction charge and submissions

Following the finding of misconduct, the panel were made aware of a further charge in relation to a conviction against Miss Dickens:

‘That you, a registered nurse:

1. Were convicted of theft from employer at Lancashire Magistrates Court on 10 January 2023

AND in light of the above, your fitness to practise is impaired by reason of your conviction.’

As per the NMC rules, the panel were presented with the conviction charge after determining the misconduct in relation to Charges 2 and 3. The panel is satisfied that the notice of the conviction charge was served on Miss Dickens at her registered address at the same time as the notice concerning misconduct.

The charge concerns Miss Dickens’ conviction and, having been provided with a copy of the memorandum of conviction, the panel finds that the facts are found proved in accordance with Rule 31 (2) and (3). These state:

- ‘31.—** (2) *Where a registrant has been convicted of a criminal offence—*
- (a) *a copy of the certificate of conviction, certified by a competent officer of a Court in the United Kingdom (or, in Scotland, an extract conviction) shall be conclusive proof of the conviction; and*
  - (b) *the findings of fact upon which the conviction is based shall be admissible as proof of those facts.*
- (3) *The only evidence which may be adduced by the registrant in rebuttal of a conviction certified or extracted in accordance with paragraph (2)(a) is evidence for the purpose of proving that she is not the person referred to in the certificate or extract.’*



The NMC submitted that on 15 September 2022, the Police received a report from the Director of Nursing at HC-One, the care home operator, regarding Miss Dickens and incidents that took place at the Home.

It was reported to the Police that Morphine had been ordered for a resident and delivered to the Home on 14 September 2022 without the manager's knowledge, that on more than once occasion Miss Dickens stole vials of five Morphine Ampoules, forged a second signature check of a colleague signing for administering Morphine to a resident and also that Miss Dickens tampered with the Controlled Drug (CD) cupboard and book.

The Police interviewed Miss Dickens on 28 October 2022, and Miss Dickens made full and frank admissions to the offence and explained that she had taken five vials of Morphine, that it was the second occasion she had done so and that the Home were not aware of the first occasion.

Miss Dickens was charged with '*On 13/09/2022 at Poulton-Le-Fylde in the county of Lancashire stole 5 Vials of Morphine of a value unknown belonging to [PRIVATE] contrary to section 1(1) and 7 of the Theft Act 1968*'. On 6 December 2022 she attended Blackpool Magistrates court and entered a plea of guilty to theft from employee.

On 10 January 2023 at Lancashire Magistrates court Miss Dickens was sentenced to community order, 100 hours unpaid work and was ordered to pay a victim surcharge of £114.00 and £85.00 court costs.

The NMC submitted that Miss Dickens fitness to practise is impaired by reason of her conviction. It stated that Miss Dickens has clearly brought the profession into disrepute by the very nature of the conduct she displayed. Nurses occupy a position of trust and must act and promote integrity at all times. Professionalism and integrity are fundamental tenets of the profession that have been severely breached in this case. The public has the right to expect high standards of registered professionals. The seriousness of the conviction is such that it calls into question her professionalism in her workplace. This therefore has a negative impact on the reputation of the profession and, accordingly, has brought the profession into disrepute.

The conduct displayed is fundamentally incompatible with being a registered professional because the qualities required of Miss Dickens have been significantly undermined and compromised. The NMC submitted that Miss Dickens has not displayed any insight. Although Miss Dickens has made full admissions to the charges and admitted that her fitness to practise is impaired, she has failed to provide any reflection or any insight to her action that led to her conviction.

The NMC submitted that it considers there to be a continuing risk to the public due to the severity of the concerns which are more difficult to put right. Miss Dickens offence of theft from employer took place inside her place of work whilst she was performing her professional duties, the offence has resulted in Miss Dickens receiving a sentence with the following requirements: 100 hours of unpaid work to be complete by 9 January 2024, costs of £85.00 and a victim surcharge of £114.00.

The NMC submitted that a finding of impairment is essential to maintain public confidence in the profession. In light of this, it is submitted that a finding of impairment is necessary on public interest grounds.

### **Decision and reasons on impairment**

The panel next went on to decide if as a result of the misconduct and conviction, Miss Dickens' fitness to practise is currently impaired.

In coming to its decision, the panel had regard to the Fitness to Practise Library, updated on 27 March 2023, which states:

*'The question that will help decide whether a professional's fitness to practise is impaired is:*

*"Can the nurse, midwife or nursing associate practise kindly, safely and professionally?"*

*If the answer to this question is yes, then the likelihood is that the professional's fitness to practise is not impaired.'*

Nurses occupy a position of privilege and trust in society and are expected at all times to be professional and to maintain professional boundaries. Patients and their families must be able to trust nurses with their lives and the lives of their loved ones. To justify that trust, nurses must be honest and open and act with integrity. They must make sure that their conduct at all times justifies both their patients' and the public's trust in the profession.

In this regard the panel considered the judgment of Mrs Justice Cox in the case of *CHRE v NMC and Grant* in reaching its decision. In paragraph 74, she said:

*'In determining whether a practitioner's fitness to practise is impaired by reason of misconduct, the relevant panel should generally consider not only whether the practitioner continues to present a risk to members of the public in his or her current role, but also whether the need to uphold proper professional standards and public confidence in the profession would be undermined if a finding of impairment were not made in the particular circumstances.'*

In paragraph 76, Mrs Justice Cox referred to Dame Janet Smith's "test" which reads as follows:

*'Do our findings of fact in respect of the doctor's misconduct, deficient professional performance, adverse health, conviction, caution or determination show that his/her/their fitness to practise is impaired in the sense that S/He/They:*

- 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 medical 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 medical profession; and/or*

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

The panel determined that limbs a), b), c) and d) were engaged in Miss Dickens' case.

The panel finds that residents were put at unwarranted risk of harm, as Miss Dickens took for her own personal use Morphine that was to be administered to Resident A, [PRIVATE] She falsified documentation that she had given Resident A the Morphine. Miss Dickens also stole five vials of Morphine for her own use. By stealing the Morphine, she was potentially depriving other residents of medication that may have been needed and may have put them at risk of harm as a result of her misconduct. Miss Dickens' misconduct and conviction for theft from an employer had also breached the fundamental tenets of the nursing profession and therefore brought its reputation into disrepute. The panel was satisfied that confidence in the nursing profession would be undermined if its regulator did not find charges relating to dishonesty extremely serious.

The panel considered carefully whether the misconduct in this case was capable of being remediated. It concluded that the misconduct was at the serious end of the spectrum, however, could still be capable of remediation.

Regarding insight, the panel considered that Miss Dickens made early admissions to the theft during the local investigation, to the police and also plead guilty to the offence at the first opportunity. Miss Dickens also in her CMF admitted to all the charges put to her and submitted that her fitness was impaired. However, the panel considered that Miss Dickens has not provided any evidence by way of a reflective statement into how her actions may have impacted her patients, colleagues and the nursing profession. The panel noted the limited information provided by Miss Dickens at the time of these incidents [PRIVATE]. However, the panel was not provided with any evidence from either the NMC or Miss Dickens that assisted them any further in this matter. The panel had no information of any training that she may have undertaken. In that regard the panel determined that Miss Dickens if allowed to practice without restriction would be at risk of repeating her actions and putting patients at risk of harm.

The panel therefore decided that a finding of impairment is necessary on the grounds of public protection.

The panel bore in mind that the overarching objectives of the NMC; to protect, promote and maintain the health, safety, and well-being of the public and patients, and to uphold and protect the wider public interest. This includes promoting and maintaining public confidence in the nursing and midwifery professions and upholding the proper professional standards for members of those professions.

The panel determined that a finding of impairment on public interest grounds is required because Miss Dickens has not maintained or upheld professional standards in being convicted of a criminal offence of theft from an employer. In addition, the panel noted that the dishonest acts of falsifying documentation by forging the signature of a colleague, to conceal the theft of controlled drugs may be indicative of deep seated attitudinal concerns, that raise fundamental questions about Miss Dickens' professionalism.

In addition, the panel concluded that public confidence in the profession would be undermined if a finding of impairment were not made in this case and therefore also finds Miss Dickens' fitness to practise impaired on the grounds of public interest.

In all the circumstances, and on the evidence before it, the panel could not conclude that Miss Dickens was capable of practising kindly, safely and professionally.

Having regard to all of the above, the panel was satisfied that Miss Dickens' fitness to practise is currently impaired on both public protection and public interest grounds.

## **Sanction**

The panel has considered this case very carefully and has decided to make a striking-off order. It directs the registrar to strike Miss Dickens off the register. The effect of this order is that the NMC register will show that Miss Dickens has been struck-off the register.

In reaching this decision, the panel has had regard to all the evidence that has been adduced in this case and had careful regard to the Sanctions Guidance (SG) published by the NMC. The panel accepted the advice of the legal assessor.

### **Representations on sanction**

The panel noted the NMC's sanction that it would seek the imposition of a 9-month suspension order with review if it found Miss Dickens' fitness to practise currently impaired.

The NMC provided panel with the sanctions available and why a suspension order would be the best course of action. The NMC submitted that the appropriate and proportionate sanction is one of a 9-month suspension order with review. Miss Dickens has brought the profession into disrepute and trust and confidence in the profession is likely to be seriously eroded by the fact that she has committed an offence and received a sentence for it. This sanction is required to maintain confidence in the profession and the NMC as regulator. Miss Dickens conviction is not incompatible with her remaining on the register,

### **Reasons for sanction**

Having found Miss Dickens' fitness to practise currently impaired, the panel went on to consider what sanction, if any, it should impose in this case. The panel has borne in mind that any sanction imposed must be appropriate and proportionate and, although not intended to be punitive in its effect, may have such consequences. The panel had careful regard to the SG. The decision on sanction is a matter for the panel independently exercising its own judgement.

The panel took into account the following aggravating features:

- Abuse of a position of trust
- Lack of insight into failings
- One off incident with multiple aspects of dishonesty – the act of covering up the theft, falsifying documentation and involving a colleague by forging their signature
- Potentially involving a colleague into her dishonest acts

- Conduct which put vulnerable patients at risk of suffering harm.

The panel also took into account the following mitigating features:

- Early admissions at local interview, the police and within Miss Dickens' CMF
- [PRIVATE]

The panel first considered whether to take no action but concluded that this would be inappropriate in view of the seriousness of the case. The panel decided that it would be neither proportionate nor in the public interest to take no further action.

It then considered the imposition of a caution order but again determined that, due to the seriousness of the case, and the public protection issues identified, an order that does not restrict Miss Dickens' practice would not be appropriate in the circumstances. The SG states that a caution order may be appropriate where *'the case is at the lower end of the spectrum of impaired fitness to practise and the panel wishes to mark that the behaviour was unacceptable and must not happen again.'* The panel considered that Miss Dickens' misconduct and conviction was at the higher end of the spectrum and that a caution order would be inappropriate in view of the seriousness of the case. The panel decided that it would be neither proportionate nor in the public interest to impose a caution order.

The panel next considered whether placing conditions of practice on Miss Dickens' registration would be a sufficient and appropriate response. The panel is of the view that there are no practical or workable conditions that could be formulated, given the nature of the charges in this case. The misconduct in this case has the potential to be remediated, however, the panel had no evidence of further engagement from Miss Dickens or what her current circumstances are at this time. Furthermore, the panel concluded that the placing of conditions on Miss Dickens' registration would not adequately address the seriousness of this case and would not protect the public.

The panel then went on to consider whether a suspension order would be an appropriate sanction. The SG states that suspension order may be appropriate where some of the following factors are apparent:

- *A single instance of misconduct but where a lesser sanction is not sufficient;*
- *No evidence of harmful deep-seated personality or attitudinal problems;*
- *No evidence of repetition of behaviour since the incident;*
- *The Committee is satisfied that the nurse or midwife has insight and does not pose a significant risk of repeating behaviour;*

The panel was of the view that although it was a one off incident it included multiple dishonest acts that is indicative of harmful deep-seated personality or attitudinal problems. The panel has identified that there is no information before it of Miss Dickens' insight or remorse into her failings and how these can be addressed.

The panel determined that the conduct, as highlighted by the facts found proved, was a significant departure from the standards expected of a registered nurse. The panel noted that the serious breach of the fundamental tenets of the profession evidenced by Miss Dickens' actions and conviction is fundamentally incompatible with Miss Dickens remaining on the register.

In this particular case, the panel determined that a suspension order would not be a sufficient, appropriate or proportionate sanction.

Finally, in looking at a striking-off order, the panel took note of the following paragraphs of the SG:

- *Do the regulatory concerns about the nurse or midwife raise fundamental questions about their professionalism?*
- *Can public confidence in nurses and midwives be maintained if the nurse or midwife is not removed from the register?*
- *Is striking-off the only sanction which will be sufficient to protect patients, members of the public, or maintain professional standards?*

Miss Dickens' actions were significant departures from the standards expected of a registered nurse, and are fundamentally incompatible with her remaining on the register. The panel was of the view that the findings in this particular case demonstrate that Miss



Dickens' actions were serious and to allow her to continue practising would undermine public confidence in the profession and in the NMC as a regulatory body.

Balancing all of these factors and after taking into account all the evidence before it during this case, the panel determined that the appropriate and proportionate sanction is that of a striking-off order. Having regard to the matters it identified, in particular the effect of Miss Dickens' actions in bringing the profession into disrepute by adversely affecting the public's view of how a registered nurse should conduct themselves, the panel has concluded that nothing short of this would be sufficient in this case.

In making this decision, the panel carefully considered the submissions of the NMC in relation to the sanction that the NMC was seeking in this case. However, the panel considered that Miss Dickens' misconduct and conviction were so serious that to remain on the register would undermine public confidence in the NMC as regulator.

Balancing all of these factors and after taking into account all the evidence before it during this case, the panel determined that the appropriate and proportionate sanction is that of a striking-off order. Having regard to the matters it identified, in particular the effect of Miss Dickens' actions in bringing the profession into disrepute by adversely affecting the public's view of how a registered nurse should conduct herself, the panel has concluded that nothing short of a striking off order would be sufficient in this case.

The panel considered that this order was necessary to mark the importance of maintaining public confidence in the profession, and to send to the public and the profession a clear message about the standard of behaviour required of a registered nurse.

This will be confirmed to Miss Dickens in writing.

### **Interim order**

As the striking-off order cannot take effect until the end of the 28-day appeal period, the panel has considered whether an interim order is required in the specific circumstances of this case. It may only make an interim order if it is satisfied that it is necessary for the protection of the public, is otherwise in the public interest or in Miss Dickens' own interests

until the striking-off sanction takes effect. The panel heard and accepted the advice of the legal assessor.

### **Representations on interim order**

The panel took account of the representations made by the NMC that submitted that an interim order is necessary for the protection of the public and also otherwise in the public interest for an interim suspension order for a period of 18 months, to cover the appeal period.

### **Decision and reasons on interim order**

The panel was satisfied that an interim order is necessary for the protection of the public and is otherwise in the public interest. The panel had regard to the seriousness of the facts found proved and the reasons set out in its decision for the substantive order in reaching the decision to impose an interim order.

The panel concluded that an interim conditions of practice order would not be appropriate or proportionate in this case, due to the reasons already identified in the panel's determination for imposing the substantive order. The panel therefore imposed an interim suspension order for a period of 18 months to allow time for any appeal to be determined.

If no appeal is made, then the interim suspension order will be replaced by the substantive striking off order 28 days after Miss Dickens is sent the decision of this hearing in writing.

That concludes this determination.