



**UKCP's Complaints and Conduct Process  
Complaint Hearing**

**23, 24, & 25 June, 23 September, 6 October 2025**

**1 December 2025**

**ONLINE**

<b>Name of Registrant:</b>	Stephen James Derrick (HIPC)
<b>Heard by:</b>	Adjudication Panel
<b>Panel Members:</b>	Catherine Hinton (Lay Chair) Suzanne Schultz (HIPC) Stephen Coulter (CFCST)
<b>Legal Assessor:</b>	Jon Whitfield KC, Doughty Street Chambers
<b>Panel Secretary:</b>	Bethany Rees
<b>UKCP Presenting Officer:</b>	Kriti Upadhyay, Guildhall Chambers
<b>Registrant's Representative:</b>	Wendy Hewitt, 5 St Andrews Hill
<b>Charges found proved:</b>	1a-e, 2d, 3, 4a,b, 5a,b,e, 6a,b, 7, 8, 9, 10d, 11, 13, 14b, 15a-j, 16, 17, 18a,b, 19, 20, 21a,b, 22a,b,c,e,f,g,i,j,k,l
<b>Charges found not proved:</b>	2a-c, 5c, d, 10a,b,c, 12a,b,c, 14a, 21c, 22d, 22h
<b>Panel decision:</b>	Misconduct found proved. Current impairment found proved
<b>Sanction:</b>	Removal from the Register

## Detail of allegations

That being a UKCP-registered psychotherapist since at least 1999, you Stephen James Derrick (the Registrant):

### Client A

1. Between 3 January 2023 - 5 January 2024, while being in a therapeutic relationship with Client A, you:
  - a. entered into a personal ~~and/or sexual~~ relationship with Client A;  
**Denied, admitted in evidence. Found proved**
  - b. exchanged hundreds of emails with Client A, including emails of an intimate and personal nature (**Appendix A**);  
**Admitted and found proved by way of admission**
  - c. on one or more occasions, discussed your personal issues with Client A, including your health concerns ~~and marital issues~~;  
**Denied, admitted in evidence. Found proved**
  - d. on one or more occasions, offered Client A longer sessions and/or additional sessions at no extra cost;  
**Admitted and found proved by way of admission**
  - e. on one or more occasions, suggested excursions you could take with Client A outside of sessions.  
**Admitted and found proved by way of admission**
2. Between September 2023 - December 2023, during one or more sessions with Client A, you touched Client A. In particular, you:  
~~a. stroked Client A's face and body;~~  
~~b. stroked Client A's breast;~~  
~~c. kissed Client A's forehead;~~
  - d. hugged Client A.  
**Admitted and found proved by way of admission**
3. In June 2023, you arranged with Client A that she would water your garden whilst you were on holiday, in exchange for a free therapy session.  
**Admitted and found proved by way of admission**
4. On 28 September 2023, you:
  - a. invited Client A to meet you at a riverbank;  
**Admitted and found proved by way of admission**
  - b. spent around one hour with Client A at the riverbank.  
**Admitted and found proved by way of admission**
5. On 16 November 2023, you:

- a. invited Client A to meet you at a lake where you were fishing;  
**Admitted and found proved by way of admission**
  - b. spent several hours with Client A at the lake;  
**Admitted and found proved by way of admission**
  - ~~c. hugged Client A;~~
  - ~~d. told Client A she was "beautiful" as she was leaving, or words to that effect;~~
  - e. sent emails to Client A saying, "You are a wonderful woman" and "You were wonderful company" (**Appendix A, page 203**).  
**Admitted and found proved by way of admission**
6. On 17 November 2023, you:
    - a. told Client A that she could join you on the bank side where you were sitting;  
**Admitted and found proved by way of admission**
    - b. spent around 20 minutes with Client A at the bank side.  
**Admitted and found proved by way of admission**
7. On 22 November 2023, you sent an email to Client A saying, "And me you [Client A]. Xxx" in response to Client A's email saying, "Love you xxx" (**Appendix A, page 181**).  
**Admitted and found proved by way of admission**
8. On 30 November 2023, you sent an email to Client A saying that you missed her (**Appendix A, page 140**).  
**Admitted and found proved by way of admission**
9. On 5 December 2023, you sent emails to Client A saying, "Wonderful to see you [Client A]. Thank you. I experience you to be an absolute privilege to know. Lovely you. Love Stephen Xxxx" and "Love you" (**Appendix A, page 113**).  
**Admitted and found proved by way of admission**
10. On 8 December 2023, during a session with Client A, you:
    - ~~a. hugged Client A whilst lying next to her on the floor;~~
    - ~~b. climbed on top of Client A and told her that you wanted to "ravish" her, or words to that effect;~~
    - ~~c. asked Client A if you could love each other and you still be her therapist, or words to that effect;~~
    - d. sent an email to Client A saying, "I feel my love of you. It is indeed strong. I find myself wanting to say much. And if I may will attempt to, face to face when we meet. I thought you were beautiful tonight. You are indeed beautiful in so many ways. Thank you. Lovely you. Love Stephen Xxxx" (**Appendix A, page 78-79**).  
**Admitted and found proved by way of admission**

11. From 9 December 2023 onwards, on one or more occasions, you attempted to encourage Client A to continue your personal and/or therapeutic relationship.

**Admitted and found proved by way of admission**

~~12. On 10 December 2023, during a session with Client A, you:~~

- ~~a. hugged Client A whilst lying next to her on the floor;~~
- ~~b. stroked Client A's body;~~
- ~~c. told Client A, "We don't always have to do therapy, sometimes we can just lay here and talk", or words to that effect.~~

13. On 11 December 2023, you sent an email to Client A saying, "I worry that somehow my name will be brought into your meeting and that scares me. I would rather end my role as a therapist than be drawn into my name being shared" (**Appendix A, page 42**).

**Admitted and found proved by way of admission**

14. On 5 January 2024, during your final session with Client A, you:

- ~~a. blamed your actions on Client A;~~
- b. expressed concerns that Client A would disclose your name to her new therapist and therefore damage your reputation.

**Denied (1<sup>st</sup> limb accepted, 2<sup>nd</sup> part denied) – Found proved**

## **Client B**

15. Between 11 May 2017 to 11 July 2024, while being in a therapeutic relationship with Client B, you:

- a. entered into a personal relationship with Client B;

**Denied – Found proved**

- b. exchanged hundreds of emails with Client B, including emails of a personal nature (**Appendix B**);

**Denied - partial admission – Found proved**

- c. on one or more occasions, gave gifts to Client B;

**Admitted and found proved by way of admission**

- d. on one or more occasions, offered Client B additional sessions at no extra cost;

**Admitted and found proved by way of admission**

- e. on one or more occasions, called Client B "beautiful";

**Denied – Found proved**

- f. on one or more occasions, held Client B;

**Denied (partial admission) – Found proved**

- g. on one occasion, put your hands on Client B's neck unsolicited;

**Denied – Found proved**

- h. on one occasion, invited Client B to lie with you naked;

**Denied – Found proved**

- i. on one occasion, invited Client B to meet you at the riverbank;

**Denied – Found proved**

- j. on one or more occasions, referred prospective Clients to Client B in her capacity as a counsellor.

**Admitted and found proved by way of admission**

16. On 14 June 2024, you offered to accompany Client B to medical appointments.

**Admitted and found proved by way of admission**

17. On one occasion in or around January 2020, you cuddled and held Client B whilst you lay together on the floor. When Client B tried to move away from you, you continued to hold her.

**Denied – Found proved**

18. On 11 July 2024, during a session with Client B, you:

- a. told Client B about Client A's therapy and the complaint that Client A had made to UKCP;

**Denied PARTIAL ADMIT – Found proved**

- b. made personal disclosures to Client B about the impact of Client A's complaint on your mental health.

**Denied – Found proved**

19. On 14 July 2024, you sent an email to Client B and signed off, "Dare I say with love ? Steve xxx".

**Admitted and found proved by way of admission**

20. You did not report your actions at paragraphs 1 - 19 above to UKCP.

**Admitted and found proved by way of admission**

21. Your actions at paragraphs 1 - 20 above were:

- a. inappropriate; and/or

**Admitted re Client A and found proved by way of admission**

**Denied re Client B – Found proved**

- b. unprofessional; and/or

**Admitted Re A and found proved by way of admission**

**Denied re Client B – Found proved**

- c. sexually motivated.

**Denied re Client B – Found not proved**

22. The behaviours set out at paragraphs 1 - 21 above are in breach of UKCP's Code of Ethics and Professional Practice (2019) (the Code). In particular, you:

- a. failed to act in Client A and Client B's best interests, thereby breaching clause 1 of the Code.

**Admitted re Client A and found proved by way of admission**

**Denied re Client B – Found proved**

- b. failed to treat Client A and Client B with respect, thereby breaching clause 2 of the Code.

**Denied re Client A – Found proved**

**Denied re Client B – Found proved**

- c. failed to respect ~~Client A and~~ Client B's autonomy, thereby breaching clause 3 of the Code.

**Denied re Client A – Found proved**

**Denied re Client B – Found proved**

- ~~d. had sexual contact or a sexual relationship with Client A, thereby breaching clause 4 of the Code.~~

- e. abused and/or exploited your relationship with Client A and Client B for any purpose including your sexual or emotional gain, thereby breaching clause 5 of the Code.

**Denied re Client A – Found proved**

**Denied re Client B – Found proved**

- f. harmed Client A and Client B, thereby breaching clause 6 of the Code.

**Admitted re Client A and found proved by way of admission**

**Denied re Client B – Found proved**

- g. engaged in a dual relationship with Client A and Client B, thereby breaching clause 8 of the Code.

**Denied, admitted in evidence. Found proved**

**Denied re Client B – Found proved**

- ~~h. failed to exercise all reasonable care (taking into account the time that has elapsed since therapy ended) before entering into a personal relationship with Client A and Client B, thereby breaching clause 9 of the Code.~~

- i. failed to respect, protect and preserve Client A's confidentiality, thereby breaching clause 18 of the Code.

**Denied re Client A – Found proved**

- j. failed to act in a way which upholds the profession's reputation and promotes public confidence in the profession and its members, including outside of your professional life as a UKCP practitioner, thereby breaching clause 32 of the Code.

**Admitted re Client A and found proved by way of admission**

**Denied re Client B – Found proved**

- k. communicated with Client A and Client B in a manner inconsistent with the Code, thereby breaching clause 34 of the Code.

**Admitted re Client A and found proved by way of admission**

**Denied re Client B – Found proved**

- l. failed to report potential breaches of UKCP's Code of Ethics and Professional Practice to UKCP, thereby breaching clause 37 of the Code.

**Admitted re Client A and found proved by way of admission**

### **Admitted re Client B and found proved by way of admission**

For the reasons set out above, your fitness to practise is impaired because of your misconduct.

**Denied**

### **Documents**

The Panel had placed before it the following documents:

- A principal bundle on behalf of UKCP amounting to 1021 pages, hereafter referred to as C1;
- A principal bundle on behalf of UKCP amounting to 1150 pages, hereafter referred to as C2;
- A principal bundle on behalf of UKCP amounting to 14 pages, hereafter referred to as C3;
- A further bundle on behalf of UKCP amounting to 4 pages, hereafter referred to as C3;
- A revised bundle of allegations on behalf of UKCP amount to 4 pages, hereafter referred to as C4;
- A principal bundle on behalf of the Registrant amounting to 102 pages, hereafter referred to as R1;
- A principal bundle on behalf of the Registrant amounting to 28 pages, hereafter referred to as R2;
- A principal bundle on behalf of the Registrant amounting to 37 pages, hereafter referred to as R3;
- Submission on the facts on behalf of UKCP amounting to 15 pages;
- Submission on the facts on behalf of the Registrant amounting to 9 pages;
- A letter on behalf of the Registrant, amounting to 1 page, hereafter referred to as R4.

### **Hearing**

1. The complaint was heard under the UKCP Complaints and Conduct Process 2022, and the Panel considered the alleged breaches of the UKCP Code of Ethics and Professional Conduct 2019 and Ethical Principles and Code of Professional Conduct 2009 (the Code).

### **Preliminary Matters**

2. The Panel considered the following preliminary matters:
  - a. Application for the hearing to be conducted in private
  - b. Special measures for witness/Client B
  - c. The admission of Client A's statement in her absence as a witness in person
  - d. The admission of the statement and/or evidence by witness EM
  - e. The admissibility of certain parts of the character references lodged on behalf of the Registrant
3. The parties agreed that the fifth application relating to the admissibility of parts of the Registrant's case should be heard at a later point in the proceedings.

### **Application for the hearing to be conducted in private**

4. Following pre-hearing discussion between Ms Upadhyay, Counsel for the UKCP and Ms Hewitt, Counsel for the Registrant, a joint application was made for the entirety of the hearing to be in private. Whilst both Counsel recognised the principle that regulatory proceedings should normally be conducted in public both submitted that due to the nature, content and detail of the allegations there were cogent reasons for the case to be heard in private. These included the protection of the private lives of the witnesses and Registrant and the management of the case.
5. The Panel accepted the advice of the Legal Assessor which included the necessity for hearings to be public unless there was good and sufficient reason to be heard in private.

### **Determination on the application for the hearing to be conducted in private**

6. The Panel determined that the hearing should be in private until it considered otherwise.
7. In coming to this conclusion, the Panel recognised the wider interest in hearings such as this being held in public against the private interests of the participants including witnesses and the Registrant. It recognised that the allegations in this case concerned the private and personal lives of the participants. The Panel concluded that these private interests outweighed the public interest. In addition the Panel recognised that the public interest could otherwise be met by a careful consideration of what statement (if any) could be published by the UKCP concerning this case when it has concluded.

### **Application for Special measures for witness/Client B**

8. Similar to the above application, following discussion between Counsel and the Legal Assessor Ms Upadhyay applied for special measures to enable Client B to give her best evidence. She submitted that Client B had expressed anxiety regarding the proceedings and that such measures would assist her in giving her best evidence. The application was for the Registrant to turn off his microphone and camera during Client B's evidence. He would still be able to see and hear the evidence.
9. The application was not opposed.

### **Determination on the issue of special measures**

10. The Panel accepted the advice of the Legal Assessor regarding the measures available to assist a witness to give their best evidence in cases such as this.



11. The Panel determined that the agreed special measures were reasonable and proportionate. They would enable Client B to give her best evidence but did not impact upon the Registrant's ability to see and hear the evidence or otherwise participate in the proceedings.
12. The Panel was of course aware of the principle that no adverse inferences could or should be drawn against the Registrant due to the need for special measures to be in place.

#### **Application to admit the statement and/or evidence of witness EM**

13. EM is a professional witness whose statement sets out what she says is a summary of events recounted to her by Client A regarding the Registrant during their therapeutic sessions. She comments as to Client A's presentation (physical and apparent state of mind) when she recounted the events.
14. Ms Hewitt submitted that EM's evidence was hearsay and as such it should not be admitted. She submitted that the fact that Client A disclosed matters to EM did not lend weight to her allegations against the Registrant. Such disclosure did not show Client A was correct or truthful in her allegations and it was prejudicial.
15. Ms Upadhyay sought to rely on EM's statement on two bases. First, the disclosure was akin to a 'recent complaint' and as such it went to the consistency and credibility of Client A. Second, it lent weight to the reason why Client A was not present as a witness, namely her distress at participating in the proceedings.
16. Ms Hewitt submitted that it was unfair for EM's evidence to be used to support the credibility of an absent witness.

#### **Determination on the Admissibility of EM's evidence**

17. The Panel accepted the advice of the Legal Assessor regarding EM's evidence. This included that the test for admissibility was dependent on relevance and fairness. If the evidence was relied on as evidence of Client A's presentation/state of mind and/or to support her credibility alone it was not hearsay. (A statement by a third party such as EM is only hearsay if it is relied on for the truth of the statement.)
18. The Panel determined that EM's statement and/or live evidence should be admitted.
19. The Panel considered that EM's evidence was relevant to the reason why Client A was not present (her presentation and state of mind) and it was relevant to the consistency and credibility of Client A. The Panel determined that in neither circumstance was the evidence hearsay.

20. In considering the fairness of admitting the evidence, the Panel noted the limited way in which the UKCP sought to rely upon the evidence (consistency and reason for absence) and the specific assurance that the truth of the disclosure made by Client A to EM was not relied upon by the UKCP. The Panel also took account of the fact that Ms Hewitt would be in a position to cross-examine EM, to challenge her account of Client A's disclosure and/or her presentation and to undermine EM or discredit Client A through cross-examination of EM's account.

#### **Application to admit Client A's statement in her absence as a witness in person**

21. Ms Upadhyay applied to admit Client A's statement in full since she was not in attendance as a witness. She asserted that the case had been listed in November 2024 at which time Client A was willing and able to give evidence. The case was adjourned when Client B's complaint came to light so that the allegations could be heard together. Following this Client A expressed reluctance to participate asserting that she found the proceedings extremely challenging and harmful to her mental health.
22. Ms Upadhyay took the Panel through a number of emails between Client A and the UKCP during which the UKCP sought to reassure Client A and persuade her to give evidence. At one point Client A agreed to continue but thereafter she declined to take any further part in the proceedings. The Registrant's representatives were put on notice that an application such as this may be made.
23. Ms Upadhyay referred the Panel to a letter from Client A's GP regarding her health and the opinion that subjecting her to the stress of a hearing may worsen her presentation.
24. Ms Upadhyay referred the Panel to the test of admissibility of evidence namely that it must be relevant and fair to admit and to the fact that the Panel could determine what weight to put to evidence including what weight to give to evidence if a witness was not present. She referred the Panel to the well-known cases of **Ogbonna v NMC [2010]** and **Thornycroft v NMC [2014]** and the principles in the admission of evidence such as this. She conceded that the admission of a witness statement in the absence of a witness was not a routine matter and the fairness of doing so should be carefully considered.
25. Ms Upadhyay submitted that there was a good and cogent reason for the witness to be absent. She conceded that Client A's witness statement was the sole and decisive evidence in several of the matters in dispute, but that fairness meant this should be looked at both from the perspective of the Registrant and the public interest. In referring to the case of **Thornycroft**, Ms Upadhyay suggested there was a seven-point test to the admission of such evidence which included consideration of: whether the statement was the sole and decisive evidence, the nature and extent of challenge to the content of the statement, was there any reason to believe that the complaint may have been fabricated, the seriousness of the allegation and the impact its proof may have upon the Registrant, is there a good reason for the witness to be absent, had the UKCP made sufficient attempt to facilitate

the attendance of the witness and had the Registrant been forewarned of this. She drew the distinction between a formal signed witness statement and informal oral statements and to the weight that should be given to the public interest when considering the issue of fairness.

26. Looking at the seven points made in **Thornycroft** Ms Upadhyay conceded that Client A's statement was the sole and decisive evidence in respect of some matters, but she submitted that it could be challenged by the Registrant giving evidence himself. She submitted that there was no reason to believe that Client A had fabricated her complaint. She recognised that the challenges and the consequences of proving the allegations were serious. She argued that that was a good reason for the witness to be absent and submitted that the UKCP had made all reasonable efforts to ensure her attendance. Finally, she submitted that the Registrant's representatives had been informed of these difficulties and of this potential application.
27. In response, Ms Hewitt objected to the admission of Client A's statement. She drew a distinction between Client A's statement and the emails exhibited by her, the admission of which was not in dispute. She said that the Registrant had made concessions in respect of many of the matters set out in the emails but the disputed matters contained in Client A's statement were extensively challenged. She then laid out the allegations for which Client A's statement was the sole and decisive evidence. She submitted that the issue was serious for both sides but that the consequences of admission were very serious for the Registrant. She submitted that there was nothing in the emails to support what Client A said regarding the contested matters. She conceded that significant attempts had been made to persuade Client A to attend but asserted that it was her choice and that the letter from the GP did not really assist.
28. Ms Hewitt submitted that it was not a routine matter to admit the statement of an absent witness and that the unfairness that proceeded from its admission could not be met by adjusting the weight to be given to that evidence. She submitted that there was no good reason for the witness to be absent but that even if there was, the prejudice to the Registrant in being unable to challenge Client A's account rendered the admission of the statement unfair. She submitted that the evidence of EM did not cure this unfairness and that the Registrant could not test or challenge Client A's evidence at all. She submitted that the overarching consideration was the seriousness of the charges and their potential impact upon the Registrant. She said that he was at a significant disadvantage and the prejudice could not be overcome by merely adjusting the weight to be applied to Client A's evidence.
29. In response to an inquiry from the Legal Assessor Ms Upadhyay submitted that the admissions made by the Registrant could be used by the Panel when considering Client A's credibility and that the comment by EM at paragraph 4 of her statement lent weight to the reason why Client A was absent and was not hearsay. Ms Hewitt submitted that such approaches were an oversimplification and it was not appropriate to conclude that because the Registrant had made admissions about some

allegations that the rest of the allegations were necessarily true or Client A was credible. She reiterated that admitting EM's evidence was not relevant and not fair.

#### **Application to exclude the evidence of EM**

30. Ms Hewitt submitted that, apart from paragraph 4 of EM's statement (which speaks of Client A's presentation and apparent state of mind) all of EM's statement was hearsay. She said that EM was not present during any of the matters complained of and was in no position to say if the allegations were correct or not. She said EM's evidence was prejudicial and did not corroborate Client A's complaints.
31. Ms Upadhyay submitted that EM's evidence could be admitted since it was relevant and it was fair to do so. She confirmed it was not hearsay since the truth of what was said was not relied upon by UKCP, rather the fact certain things were reported by EM as being said by Client A were relied upon only as a previous 'recent complaint'. The evidence went to the issue of Client A's consistency and reliability. She submitted that it also went to Client A's state of mind, the impact of the alleged events and thus the seriousness of the case.
32. Ms Hewitt said that to rely on the statement to support the credit of an absent witness was unfair.

#### **Determination on the Admission of Client A's statement**

33. The Panel accepted the advice of the Legal Assessor regarding the admission of Client A's statement. This included that the test for admissibility was dependent on relevance and fairness and that the admission of an absent witnesses statement was not a routine matter. The Panel must first consider relevance and, if this limb of the test was met, it should consider the fairness of admitting the evidence. This required careful analysis of why the witness was absent and what had been done to secure her attendance, the importance of the evidence to both parties (sole and decisive, consequences, protection of the public etc), the degree of prejudice to the Registrant, whether this prejudice could be met by careful advice, adjusting the weight to be given to the statement or by the Registrant giving evidence.
34. The Panel determined that Client A's statement should not be admitted in evidence.
35. In coming to the above conclusion the Panel first considered that the evidence was relevant to the allegations. The Panel noted that Ms Hewitt did not challenge this. It was in any event evident that Client A's statement was the basis for the matters in dispute. It was thus clearly relevant.
36. The Panel next considered whether there was a good and sufficient reason for Client A to be absent. It concluded there was. The email trail, GP's letter and paragraph 4 of EM's witness statement all

spoke of the stress and distress experienced by Client A and, the GP's letter spoke of the potential consequences of her attending the hearing. The Panel was mindful of the fact that when this case was first listed in November 2024 Client A was intending and ready to give evidence. Unfortunately, the case was adjourned due to the receipt of further information which the parties needed to consider, but which could not be disclosed to Client A. This caused understandable distress to Client A following which she expressed concern regarding her continued participation in the proceedings. The Panel was equally satisfied that the UKCP had done all that they reasonably could to reassure Client A and/or supporting her to attend and give evidence. The Panel did not consider it to be Client A's choice to be absent in the way asserted by Mr Hewitt, rather it was satisfied that Client A felt unable to proceed due to her physical and/or mental health needs.

37. The Panel then went on to consider the matters outlined in **Thorneycroft** and the other case referred to by the advocates and the Legal Assessor. The Panel determined that Client A's statement was indeed the sole and decisive evidence on many if not all of the matters in dispute. It was thus important to the UKCP in proving its case but, it was also important for the Registrant to be able to challenge that evidence. The consequence of admitting potentially unfair evidence fell squarely on the Registrant. The Panel noted that the disputed allegations were not referred to in the emails or the statement of EM. As such these did not lend weight to her credibility or consistency indeed they were potentially a basis for challenge.
38. The Panel concluded that the central issue to admissibility was the prejudice to the Registrant in him being unable to challenge the principal and sole witness on the most serious allegations. The Panel was not satisfied this could be cured by adjusting the weight to be given to the evidence or to Client A's credibility. Nor was it an answer that the Registrant could give evidence since that gave the appearance of assuming that he had to prove his innocence.
39. The Panel recognised the importance of the evidence to the case presented by the UKCP and to the public interest in its admission. However, the Panel concluded that the public interest was outweighed by the prejudice to the Registrant as described above. This prejudice could not be ameliorated and as such admission of Client A's statement would be unfair.

#### **Determination on the admission of EM's evidence**

40. The Panel determined that EM's evidence should be admitted. In coming to this conclusion the Panel first noted that the evidence was admissible for the purpose outlined by Ms Upadhyay, namely as a previous (recent) complaint going to the issue of consistency and credibility. It also affirmed Client A's state of mind and alleged impact of the conduct of which the Registrant was accused. In these respects the Panel was of the view that the evidence was relevant to issues in dispute. The Panel then considered the fairness of admitting or excluding such evidence. It concluded that Ms Hewitt could cross-examine and challenge EM on behalf of the Registrant and he was not disadvantaged by the

admission of the evidence. In addition, having determined that the evidence was relevant to two important issues, the Panel was of the view that it would be prejudicial to the public interest and contrary to the overarching objective to exclude EM's evidence.

### **Amending the Allegation**

41. Following the Panel's determination of the preliminary arguments Ms Upadhyay applied to amend the Allegation by withdrawing or amending a number of the particulars as shown above.
42. The application was not opposed.
43. The Panel consented to the application since it was in accordance with the above determination regarding the admissibility of evidence. The amendment clarified those matter which remained in dispute between the parties.

### **Opening statement by Ms Upadhyay on behalf of UKCP**

44. Ms Upadhyay said that the Registrant entered into a therapeutic relationship with Client A for several months and with Client B for several years. She said that the UKCP case was that the Registrant engaged in inappropriate behaviour on several occasions with both Clients. She said that the case involved the Registrant entering into personal relationships blurring the professional boundaries between himself and his Clients. She submitted that it was a serious breach of Client A's confidentiality to disclose details about her to Client B. Regarding Client B, she said that there was a significant crossing of professional boundaries in July 2024 when the Registrant told Client B about Client A's complaint, her therapy and the impact the complaint had upon himself.
45. She said that there were many emails between the Registrant and both Clients and that these had been formally admitted into evidence by both parties. She said that there were multiple references to kisses, love and personal messages and that they had no professional context to them. Messages include references to a dress, the late Benjamin Zephaniah, others spoke of personal and health issues, family matters and a pet. Ms Upadhyay submitted that all of these were evidence of an ongoing personal relationship with these Clients. She submitted that the Registrant had made admissions in respect of Client A and that the Panel would hear from Client B herself. She also referred to a number of presents that the Registrant gave to Client B. Ms Upadhyay continued and suggested that allegations 15, 17, 18, 21 and 22 where they were pursued by UKCP were all made out. She said that any discussion the Registrant may have had with Client B about Client A was entirely inappropriate and unprofessional. Regarding Allegation 14b Ms Upadhyay said that the Registrant accepted he expressed concerns about a complaint but that it was his motivation for being concerned that was disputed. She then called Client B to give evidence.

## **Evidence of Client B**

46. Client B was sworn and confirmed that the contents of her statement were true and included various exhibits, namely photographs emails and a voicemail that she relied upon. Ms Hewitt then asks questions in cross examination.
47. Client B said that she was a councillor registered with the HCPC for 10 years. She said that she had a therapeutic relationship with the Registrant between May 2017 and July 2024. Ms Hewitts suggested that Client B asked the Registrant about sending emails out of hours however Client B rejected this suggestion and said that she had asked if she was crossing boundaries and the Registrant said she was not. She confirmed that the Registrant signed his emails “love Steve, x” and the kisses were from about 2020 onwards. She said that she had originally undertaken therapy because she had difficulty speaking up in meetings and she wanted support to manage her ability to do so. She said the Registrant asked her about her history and trauma and a timeline. She was asked to provide a timeline of significant events explaining that if they explored this it may assist her. Client B said that when the Registrant opened up all her previous trauma she started to experience mental health problems. She said that the Registrant had opened all this up and left her to regulate it. She put her life in his hands and she was struggling. She spoke of trauma in her life.
48. It was put to Client B that the Registrants emails and responses were always respectful but she rejected this and said that she had to stop reading some of the emails because they were not helpful and they made her feel worse. She spoke of undergoing EMDR therapy after the Registrant had described a film and related it to her experience. Client B said there were two Registrants (i.e. two sides to him). Client B said that she recalled the Registrant saying ‘be compassionate to herself’ however in one session she described him sitting and watching from his chair whilst she burned her own hand on the radiator to stay present in the therapeutic discussion. He asked her ‘what was all that about?’ and she said that she was frightened she was being hypnotised. She said that she recalled the Registrant writing ‘fondly’ but that she always struggled after each session and she now felt that she had reached out to someone for help but that he was manipulating her. She agreed that he said she should look for her sparkle and signed emails warm regards but she had no idea what he was trying to do. She described the Registrant being generous with his time responding out of hours but she also said that she was suicidal and she should have been referred on to another professional or appropriate service. She said that having now seen another professional it had only taken eight sessions with her new therapist to enable her to regulate.
49. Client B said that the Registrant gave her various gifts, a chair, a teddy bear and £5 which he said was for a drink over Christmas. Ms Hewitt challenged the money and Client B described the Registrant opening his wallet and saying ‘here’s £5, buy yourself a glass of wine over Christmas’ she said she could see him sitting in front of her and his wallet was to her right. It was put to Client B that she

required longer sessions, and he did not charge her but she denied this and said if it was a longer session, she still paid. Client B said she recalled an e-mail in which the Registrant had said money was secondary but she felt the question was “what was she to him?” She said ‘it wasn't the therapy there was enough of that anyway. Why was she in his cabin?’ She went on to describe sessions during COVID when the Registrant provided her with two or three free sessions. However she also described being alone in his cabin whilst the Registrant was in his house (this was during COVID when everyone was isolating). She described passing out and banging her head on a chair because of what they had been discussing. She then described the Registrant coming downstairs to check if she was OK.

50. Ms Hewitt took Client B through photographs of the various gifts that the Registrant had given her and she described some of the background around these gifts. It was suggested that the Registrant was thinking of things to help Client B however she said no and thought he was using these items to link her into a very abusive relationship. She said the term Stockholm syndrome came to mind.
51. Client B was then asked if she knew what was alleged against the Registrant by Client A. She said that she did not know the allegations regarding Client A or herself. Ms Hewitt then said that it was alleged during seven years he entered into a personal relationship with her. Client B said she never gave him consent to enter into a personal relationship she was his client, that was the relationship. She confirmed that the Registrant tried to and in fact did refer clients to her and that he signposted her to training. She said that he often did this but she did not go on the courses. It was suggested that he was being supportive of her career or her practise but she said that she had no idea why he did this and she did not think it was appropriate. She just said thank you but did not look at them. Client B was then taken to various of the other emails and she confirmed they were examples of the Registrant referring clients to her and something that might support her personal development. She said she did not know what his intention was and she thought that these and other emails of a personal nature were very strange. She denied that the Registrant called her beautiful or a beautiful person she said the phrase that he used was “the beautiful woman that you are”.
52. Regarding inviting Client B to meet at the riverbank, Allegation 15i, it was put to Client B that the Registrant did not do this. Client B said that the Registrant told her they could take a walk on the riverbank and there was a gate with a lock which he could open. She said she stayed quiet because she did not want to go. It was put to her that there is no gate and no lock but she said I can only tell you what he told me. She confirmed she did not in fact go to the riverbank. She said she was right in what she said. She felt traumatised and kept quiet because that is what she had learned to do. She said when she ended therapy with the Registrant she had realised that lots of things had gone on of a personal nature, which should not have happened. Regarding allegation 15f, she spoke of the Registrant frequently holding her when she did not ask for a hug. On the last occasion she said that she hugged him twice only to get out but there were other times when she did not ask for a hug. As to allegation 15g, Client B described the Registrant as having both hands around her neck. She said that she had been struggling during the week and feeling heavy in her chest. She could not speak in



the session because she felt that if she let it out she would not be able to hold onto it. She described the Registrant saying he would like to see this and do an experiment upon her. He told her to look into his eyes. She described herself as going vacant when she did this, it felt weird and the Registrant said, "she's gone". She said that was a frequent occurrence. He said that they could do an experiment and he got up stood behind her and put his hands around her neck. She said she looked down and could see that her legs were shaking and she was trying to get out. She described the Registrant having his hands around her neck for a very long time, her head and her whole body was shaking but she could not get any words out. She said her neck felt different and she felt pressure on her shoulders. The Registrant then moved back to his chair and said, 'I don't think that was helpful'. She did not reply and described him sneering and saying, 'I'm learning'.

53. Ms Hewitt next dealt with Allegation 15h and Client B said the Registrant had told her she could lie on the cushions naked in a non-sexual way. She said that she remained quiet and the Registrant said if you don't want to it's OK. She still remained quiet. It was suggested that if the Registrant had said this she would run a mile however Client B said that she was dissociated and frozen in the session she did not have the capacity to leave and felt that she could not. She said that she did leave one session and he made her feel significantly worse. She said that she was very vulnerable. Client B was asked why she did not put her any of this in an e-mail and she said that she did not dare to do this because when she had previously made a comment in an e-mail he had told her not to tell him what he was thinking.
54. It was put to Client B that the Registrant denied cuddling her on the floor. She said that she could talk Ms Hewitt through it right now and proceeded to do so. At the start of the session, she spoke of a heavy feeling in her chest which she could not hold, and she shared this with the Registrant. She described herself as shaking. The Registrant said he would like to see this. Client B said that she ended up on her knees on the floor and the Registrant came over to her and gave her a hand to help her up but she could not move, it was as if her body did not work. He then laid cushions on the floor to the left of the door beckoned her over and she crawled over on her hands and knees. The Registrant then lay on the cushions and she fell onto the cushions onto his outstretched arms and he held her. At first he did so gently but she was shaking and sweating and could not move her body nor could she breathe. She described trying to get up and then the Registrant pulled her strongly towards himself and said she should stay there longer. He then relaxed his arm and said she should get up but she said she couldn't and kept falling over. Client B said that the Registrant told her that she was processing grief, which Client B said felt weird. She described herself sitting on the floor with legs crossed, head down and she thought that the Registrant then helped her back into a chair. When she got home she said her partner thought something bad had happened. She now thought that she was releasing trauma, but this is not the way to do it. At the time, she thought the Registrant had experience and knew what he was doing.
55. Client B then spoke of the information that the Registrant had given her regarding Client A. She said it was personal information about why Client A was seeing the Registrant. He described Client A as

someone he had seen for a year because therapy wasn't working. Client B agreed that she did not have sufficient information to identify Client A however she described the Registrant saying Client A had money difficulties, might lose her house and asking for money from him. He mentioned Client A's boyfriend seeking therapy, Client A going to the riverbank and being cold and the Registrant giving her his coat. She described the Registrant as saying his supervisor did not know about this and he was looking after himself. Client B said the Registrant said he touched Client A's breast and took her onto the cushions. Client A had said something, but the Registrant had said 'stop that was his job'. Client B confirmed the Registrant did not give her a name, but she knew that Client A was a woman and that he had said a lot about her. She also referred to someone whose husband had ECT and had discussed online support. She said the Registrant described Client A as very poorly but very clever.

56. Client B said that the Registrant told her he had something to say. When he said Client A alleged that he had touched her breast and said they walked by the riverbank and so on, it was like a light switched on and she had woken up. She did not say anything but wanted to get straight out of the door. She described the Registrant as saying he was stressed and suicidal and all he thought about was her and other clients. She said although at the time it did not cross her mind that he might disclose matters about her to other people, she did think this afterwards. This made her scared and she no longer trusted him. When asked about a character statement she said she felt like she had to do it. Ms Hewitt said that she should not have been asked to do this, and Client B perceived that Ms Hewitt was 'smirking' and she said it was not funny or okay.

57. In re-examination, Client B confirmed that initially the Registrant's emails were signed off with the word 'warmly' however this later changed to 'love xxx' and she was confused by this. She said there was a part of her that ignored things like that, but she also felt perhaps she was special in some way. In retrospect she felt like she had been groomed over seven years, and the sessions felt like grooming. She said the Registrant was opening the trauma that she had and leaving her with it. He never suggested she should see anybody else or other appropriate services. She said that at the time she felt hooked in or sucked in, and she could not regulate. She confirmed the only thing she went to see the Registrant for was to be able to speak up in meeting and instead he opened up all her trauma, manipulated her, diminished her and she lost her job, her partner and her earnings. Regarding her partner she said the Registrant had told her she did not want to be with him and she said it hit her that she didn't and she thought to herself 'where did that come from?' Looking back, she felt it was controlling and she felt diminished because she could not regulate however after eight sessions with another professional therapist she could now do so. She described feeling suicidal and having to go on a course to understand what was going on. She said she could not remember any discussion about boundaries or signing a contract but she specifically went to talk about one thing only. Initially she went home and felt great but got worse and he did not stay within any boundaries. She said she did not ask for support or referrals he just did this. As to the emails she said they were not emails that she would send to any of her clients and referred to one in which the Registrant had said he was sending

it from his hotel room. Client A simply asked rhetorically “why?” (i.e. why send something from his hotel room).

58. Regarding her own inquiry as to whether the Registrant had spoken to his supervisor about the UKCP complaint, Client B said this was her own experience coming to the fore, she was worried about him [REDACTED] Regarding physical contact she said there was no discussion at first, and in sessions she could not now recall if he asked when he moved toward her. She said she might have nodded but she did not now remember. At the start there was no discussion of touching. She described the Registrant coming close putting his feet on top of hers taking her hands and then hugging her and there were times when they just stood up and hugged. She said it was not appropriate to share any details about anyone else ‘you simply don't do it, any information is personal to the client, it is meant to be a safe relationship.’ She said it had taken her a long time to be able to speak about this.
59. In response to questions from the Panel, Client A said that she had initially seen the Registrant with a view to improving her confidence to speak publicly at meetings. She said she did not recall any contract about this and certainly nothing was signed. She said that she worked in her own practice with a written contract. She confirmed that in the period 2017 to 2024 there was never any review of the work they had undertaken together, where they had been, what they were doing or where they were going. She said there was one occasion when the Registrant asked if something was helping but she did not answer him. Regarding session times, Client B said these were arranged session by session or perhaps by e-mail but there was no set time, sessions were arranged around availability.
60. Client B said there were times when she felt stuck and could not leave the relationship with the Registrant. At the beginning it was nice but little things came in and it turned into what felt like an emotionally abusive relationship. She could not say when this was. It was put to her that she had described the Registrant as manipulative and she was asked why she had the sense that he was doing this. She described it as a ‘power thing’ then she felt groomed. She said there was a power imbalance and she was scared but felt compelled to go back as if she needed him. She said that she had told the Registrant she had been abused by a hypnotherapist and he had sneered and laughed at her. She had left and felt she could not hold herself up and thought she would never go back but she felt compelled to do so. She said the Registrant denied he had sneered and said he would go to the police about that but she knew that he had done it.
61. Ms Upadhyay then called EM to give evidence. EM was sworn and adopted her statement as true and explained her qualifications as a Gestalt therapist. She was taken to paragraph 4 in her statement which related to when Client A first came to see her as she was trying to work through what had happened in the therapeutic relationship with the Registrant. EM said that at first Client A only said ‘things’ had happened but she later went on to describe the abuse that she had set out in her statement. She said Client A had at first said she had done good work with the Registrant and she had

wanted an older therapist to guide her but he had abused this. She described Client A as saying she was upset that the Registrant had made advances and he had become defensive. She was angry about the Registrant abusing the trust she had placed in him. EM described Client A as upset and feeling fragmented meaning that part of her wanted to hold on to the relationship for the Registrant to apologise so they could move on. The other part of her was angry and upset that he had tried to take advantage of her sexually whilst in therapy.

62. In cross-examination EM confirmed that she had made notes of the sessions and recorded what Client A had told her. She agreed that she was not a witness to her experience and did not know whether what was relayed to her had actually happened.
63. In response to questions from the Panel EM said that she dealt with a lot of cases regarding sexual abuse, grooming, domestic violence and registrants stepping outside their codes of ethics. She said she often worked with people who had been abused. She described Client A as ending therapy in September 2024. She said that at first Client A was very unstable and in a lot of conflict regarding therapy with the Registrant, she was stressed and anxious and she and Client A did a lot of work together to stabilise her. She said it took a very long time to build up trust between her and Client A because of what had allegedly occurred with the Registrant. She said that it took a lot of time but by the end of it Client A's anxiety and depression was at least partly resolved.
64. When asked about Gestalt therapy, EM said there was a lot of difference between therapists but from her own experience and training they do engage in physical touch and body work such as expressing how we feel in our bodies. She confirmed that she might give a client a hug or hold hands at the end of a session, but what she would not do is: pass comment, work on the floor, on cushions, nor would she work in a sexual way or get on top of her client. She said that she would ensure the boundary is not crossed, there would be no sexual touching or touching private parts or sexual postures or stroking or kissing. The most she would do is a brief hug if a client asked for it.
65. When asked about the proper fashion of signing off emails EM said that she would use phrases such as 'yours sincerely', 'take care', 'look after yourself'. She said emails did not go backwards and forwards between sessions because therapy was meant to be within a session and such emails opened this up.
66. She confirmed that if a client requested a hug she might do so, or she might suggest/ask did they need a hug and if so, it would be alright for them to ask but she did not put her own needs for a hug or anything sexual or any other contact above the needs of a client. She said touch would always be negotiated to put a client at ease because it is a personal thing it required Permission and agreement.
67. In cross-examination following these questions EM confirmed that there was a whole approach with therapists meeting and walking in the woods and so forth. She said that what she observed was the

Registrant starting with ordinary therapy gaining a client's trust and then gradually introducing more and more borderline approaches with one thing adding upon another. EM confirmed that using cushions in one session might be fine but not if they become enamoured or they spent time on the cushion. She said as things become more intense things add up. She said one instance might not be a problem.

68. In re-examination EM said that the whole of a therapy session is discussion and dialogue regarding what feels right for the client. She said they may just need to be heard or to move about or to touch something. She said that once the therapeutic alliance is built one can then ask do they feel they need a hug or would they like to sit on the floor and so on. She said that she would not necessarily write this in her notes. EM said that she would document what a client had said about a previous relationship, its impact, what they brought to the therapy session and what they needed from her.
69. Following the close of EM's evidence the UKCP's case was concluded. The Registrant then gave evidence.
70. The Registrant was sworn in and adopted his two witness statements. He spoke of his early education and his motivation for training as a nurse. He qualified as a psychiatric nurse in 1979 and then as a general nurse in 1983. He moved between psychiatric and general nursing but then embarked on further training for counselling. This included looking at Buddhism and other spiritual beliefs. Through this he began to understand that there were different levels of communication and he trained as a counsellor then a supervisor. He obtained an MA in counselling before going on to do Gestalt training. He described this as humanistic psychotherapy which used different exercises and methods to be in contact with the whole body and cognitive system. He said it is about developing contact with people, being present and using a person-centred, empathic, attuned approach to help clients deal with what they are experiencing. The approach allows for the use of tools such as models and clay.
71. The Registrant said he undertook four years of training in Gestalt therapy, and this led to his accreditation with UKCP. He described being interested in seeing how different methodologies would assist him in his work but also as a human being. He wanted to be respectful as a practitioner and as a person and said there were many developments in psychotherapy and these continued. He expressed an interest in working with clients who had experienced trauma and how this affected the Central Nervous System (CNS) and the Parasympathetic Nervous System. He was also interested in how people may regulate themselves to deal with trauma and spoke of his use of EMDR for which he did a short workshop. He said that he developed a protocol for this, waving his hands in front of a client to affect trauma such that it can move from one side of the brain to the other and be released. He said he now used taps and buzzers to do the same thing. *[Eye Movement Desensitisation and Reprocessing, EMDR, is an established method of helping people to process trauma memories and images using a variety of bilateral stimulation techniques.]*

72. The Registrant spoke of a “Diamond Approach” which involved other practitioners and non-medical people and he was going on retreat with them. He also spoke of somatic experiences for which he had recently completed three years of training. These and other training were said to be a ‘quest for knowledge that would hopefully benefit clients.’
73. Ms Hewitt asked the Registrant to explain what he meant when he said in his statement that he wanted clients to be ‘resourced’ and whether he gave gifts to clients. He said that he did not give gifts to everyone. He explained that resourcing occurs in the therapy room when he asks clients to slow down and perhaps use breathing techniques to get in contact with themselves and their limbs. He spoke of one client who he suggested should use an instrument as a tool. Another resource may be connecting with the soul of nature, gardening, walking, outdoor sports, whatever made clients feel settled and regulated rather than escalated. He mentioned an article in a UKCP publication. He said that somatic experience involved sitting with people and then described a typical therapy session sitting opposite a client. He described a purpose-built cabin for therapy sessions which doubled as an office. He said in the early days he and client may have sat on cushions but they now sat on chairs. The cushions had stayed and some clients found them helpful. He created an ambient space with a calm/relaxed atmosphere with seascape paintings and spoke of some ornaments that guests had given him. One such gift was the robin statuette. He said he understood the rules around gifts. He said there were two chairs and the cushions that some clients use on occasion.
74. When asked about physical contact with Clients the Registrant said this always required consent and it needed to be negotiated contractually with a client it was never spontaneous. He said touch was acceptable in some forms of therapy but not in others. He described a breathing exercise that might be undertaken if a client was overwrought, anxious or dissociated in which he would, with a client’s permission, place his feet outside a client’s feet and then encourage them to concentrate on breathing. Regarding Client B he spoke of standing with his fists clenched and inviting her to hold his wrists. He said that touch at the end of a session was acceptable with agreement – for example, a hug to acknowledge what has occurred. He described sitting next to a distressed client and putting an arm around her shoulders. He said he always asked if touch was ok and if it was helpful. He never offered it to new clients but only to existing clients with whom he already had a therapeutic relationship.
75. The Registrant was then asked about the outstanding allegations concerning Client A. Regarding Allegation 1a and the suggestion that he had both a therapeutic and a personal relationship with Client A, the Registrant said it depended upon the definition of personal. He said that his intention regarding meetings on the riverbank was to introduce Client A to nature but he conceded he should have been more boundaried. He said that he would point out things such as birds, trees and water as a way to help Client A come back from her anxiety. When asked about expressing love in his emails he said that it was intended to foster a caring connection and positive relationship as well as encouraging Client A to respect herself. He said he was affirming her as a fellow human being and was respectful and regardful of her. However, he then said that on reflection it may have been too much and he said

there was countertransference taking place. With the difference in ages he dealt with Client A in a fathering/nurturing way and he expressed this as love. He said he intended to benefit her but agreed he was caught up in the dynamic and he should have known better. He conceded that as he became more caught up in this (and due to his family circumstances) his feelings of being a parent came into play and impacted the therapeutic relationship.

76. Concerning Allegation 1c and the suggestion that he over-shared personal information the Registrant said that he responded to Client A's inquiry [REDACTED] He said that he had to arrange sessions around such issues.
77. Turning to Allegation 14b and the suggestion that he was concerned about his reputation, the Registrant said that he was concerned that Client A would tell her new therapist of her complaint but he was not concerned about his own reputation. It was put to him that Client A mentions his reputation and he said he did not recall anything like she alleged.
78. The Registrant was next asked about Client B and his relationship with her. He again said it depended upon the definition of personal. He described where they met including online during COVID and said that at all times it was a therapeutic relationship. He said that the emails were for the most part his response to and support of Client B's frequent experiences of self-harm, feeling at risk stress and suicidal ideation. He said that in between sessions he would encourage her to get support. He said that he refuted any suggestion that the relationship became a personal one and said that he wanted to encourage her therapeutically. When asked why he initially signed his emails warmly but then this became love and a kiss/kisses he said it was meant as an affection supportive and loving response nothing more. However, he said looking back it was perhaps careless and not boundaried. He said he was concerned for her and there was nothing sinister in them. He maintained that he cared for both Clients A and B both of whom had horrible experiences in life.
79. The Registrant said that Client B disclosed many harmful events in her life. When asked if he should have been more boundaried because of this he said she was a high functioning professional with her own clients. She seemed to be okay, and she did not dissociate during sessions; she was able to regulate and return to the present. Regarding the kisses on the emails he conceded that it looked odd and not professional but at the time it was meant in a respectful validating and caring way. He again said that issues of transference were in play and he said he could understand how it might be viewed as a personal relationship. He said that he did not have the same strong feelings of fatherhood for Client B as he did for Client A, rather he had caring feelings for Client B and was respectful. He said that he was devastated to hear Client B's suggest that she had been manipulated and groomed or that he acted for his own benefit. He said, "I refute that totally."
80. Regarding Allegation 15e, calling Client B beautiful, the Registrant said that he would have used the term something like 'the beautiful woman that you are'. He said that he did not say beautiful to

objectify her but could accept that he had said she was a beautiful person rather than meaning it in the physical sense, since she had been dealing with abuse in her life. He then said he could not remember all of what he did or didn't say.

81. When asked about Allegation 15f, that he held Client B, the Registrant said that he did so on more than one occasion because there were times when she was shaking, digging her fingernails into her hands and he would ask if it was OK to move closer and for her to lean in. He said he would do so with her permission to try and get her to breathe rhythmically. He described Client A also asking for a hug on occasion. Turning to Allegation 15g and the suggestion that he put his hands around Client B's neck the Registrant said that Client B had tension in her shoulders so he asked if it would be alright to stand behind her to touch her shoulders so she would feel support and he could get her to breathe and regulate. He said that she permitted him to do this and she was less activated. Regarding Allegation 15h, he said that at no time did he ask Client B lie naked on cushions and similarly he never lay on the floor or the cushions to cuddle her as set out in Allegation 17. He confirmed that there were cushions on the floor but that in four years of therapy she had never wanted to sit on the cushions and had always sat on the chair. Regarding Allegation 15i, he said that he did not ask Client B to go to the riverbank and there was no lock. He then said that there was a lock on a gate to stop cars going through but that one could walk past that.
82. Dealing next with Allegation 18a, the Registrant said that he accepted he told Client B about Client A's therapy and her complaint. He said that telling clients about the complaint was part of duty of care and said that no one else ask for any further detail but when Client B asked questions he answered them. It was no excuse he said, but Client B seemed to be okay. He said at no time did he disclose information that would identify Client A. He denied telling Client B about Client A's therapy. He acknowledged that such detail as he did impart should not have been disclosed. Concerning Allegation 18b, and the impact of Client A's complaint upon him, he said that Client B had mentioned something about him being suicidal but he did not say or feel this at the time. He had felt this subsequently. He conceded it was wrong of him to ask Client B for a reference.
83. The Registrant next dealt with allegation 21 and conceded that his conduct in respect of Client A was both inappropriate and unprofessional. He denied that his conduct regarding Client B was inappropriate but then conceded that the sharing of information was inappropriate. He made the same concession regarding professionalism in respect of the sharing of information about Client A with Client B but said that in all other aspects his conduct had been professional. The Registrant absolutely denied Allegation 18c, that his conduct was sexually motivated or for his own sexual gratification in respect of either Client.
84. The Registrant then dealt in short form with the matters set out in Allegation 22. Save for the disclosures concerning Client A, he rejected the allegation that he had not acted in Client B's best interests. He said that he treated both Client A and Client B with respect and allowed each of them to



make their own choices and maintain their autonomy. He denied that he had abused or exploited them. He accepted that he had caused harm to Client A but he denied doing so in respect of Client B, save again for the over-sharing of information about Client A. He denied that he was in a dual relationship with Client B. He said that he did maintain the confidentiality of his clients. He said that he upheld the reputation of the profession save in relation to the over sharing of information. Likewise he said that he communicated in a way that was consistent with the code except for the oversharing. The Registrant then answered questions in cross-examination.

85. Regarding Client A, when asked what boundaries were set the Registrant said that he had a verbal contract with her that they would meet for a certain time and that various aspects were confidential but if someone was at risk then he might have to respond to that risk. He could not recall if there were communication boundaries, but he said he seemed to recall Client A asked if she could send emails and he said yes. He said there was no discussion regarding the frequency of emails or the hours when they would be sent or when he would respond to them. It was suggested that emails contained intimate and personal details and he said if that was the evidence then he agreed with it. It was put to him that he entered into a personal relationship outside the bounds of a professional relationship, and he said it depended upon the meaning of personal. He then said if personal means 'not in the confines of a therapeutic relationship' and if it is not professional then it's personal, then yes that is what he did. When asked if it was his case that all interactions were strictly professional and within the therapeutic relationship he said obviously not. He said they were meant to be but because of the number and extent of emails he said, 'I guess you would say it is personal'. He agreed it was no part of the therapeutic relationship for personal information to be shared in emails such as where he was, who he was with and what he was doing. Nor was it part of the therapeutic relationship to talk of birthdays or poetry and he accepted that such exchanges were outside the professional relationship.
86. It was put to the Registrant that the email correspondence was correspondence between friends in a personal relationship and he said, 'yes I accept that I was caught up in the countertransference relationship'. He said he had spoken to a supervisor but had not given any detail about it and he did not take Client A to supervision as much as he should have done. Other e-mail conversations were put to him and he made the same concessions that they were not part of a therapeutic relationship but were part of a personal relationship. He was taken to an e-mail in which he refers to Client A as being beautiful and he said that this was inappropriate and he accepted this would have been a good time to set boundaries with Client A but he did not do so. It was specifically put to him that this was a personal relationship (not a sexual one) and he agreed.
87. Having accepted that he was in a personal and not just a professional relationship with Client A it was put to the Registrant that he was in a dual relationship with her, that is both a friend and a client. He said he did not regard her as a friend he regarded her as a client but he understood what was being put to him and he said I accept my job was to clarify and manage the boundaries and 'I failed to do so.' It was put to him that over one weekend he sent fifteen emails and this was both inappropriate

and excessive and he agreed. It was suggested that she was something more to him than a client which he rejected and he said he was trying to offer support. He accepted that that support was not part of the therapy and that Client A did not need to know the details that he put in his emails. He said, 'I got this wrong I accept what you say.' A reference to a Bob Dylan song and to kisses in an e-mail again he said 'I accept this looks like friends not therapist and client'. He was asked what he would do if a fellow therapist in supervision with himself was doing this and he said, 'I would tell them it was wrong the boundary has been broken it's not okay it's unprofessional.' It was put to him that Client A specifically requested continuation of a social relationship and his response was that they could remain friends and he said 'I accept that it looks like a relationship, he did not wish her any harm but he said he was under a lot of stress.' He said he was not blaming Client A but he said if he had stopped it would have been worse and he did not know how to handle this. He agreed it did not look good but there was an underlying reason. It was put to him that this was a personal (not sexual) relationship and he said, 'yes I accept it on that basis'. He also accepted Allegation 22g that it was a dual relationship. He also admitted Allegation 1c the emails included personal issues about his family and so forth and they were not necessary.

88. When asked about Allegation 14b and whether he had concerns about his reputation, the Registrant said he was not concerned about his reputation if Client A were to share information about her complaint. He said that he was supervising a number of people at the time in a small community and he did not want his name to be taken to a supervisor before he had the opportunity to explain himself to his supervisees. He said that he explained to his supervisees that there may be a complaint about himself and he ended their supervisory relationship. He said at the time his response was a panic, he was attending a member of his family in hospital and he fired off a response which was not good and not considered. He reiterated that he did not want his name drawn into something that he could not share with others first. He did not want them to be triggered. He said he was not worried about what others would think of him.
89. Ms Upadhyay then asked the Registrant about Client B and asked the Registrant if he wished to reconsider Allegation 15a, that they were in a personal (non-sexual) relationship and not just a therapeutic relationship. It was suggested that this took the form of both friendly interactions that were unsolicited and training or supervisory information that was also unsolicited. The Registrant said he could not recall whether Client B asked for the training information but he was seeking to provide her with resources for her benefit as a therapist or to avail herself of the information should she wish it. He said it was an opportunity for her. He agreed that he was not her supervisor he was her therapist but he still felt that the information might be helpful to her. He said that he had found training useful and she he thought that she might find it useful as well both as a professional and as a person. He could not recall whether Client B asked him to refer clients to him. However, when he was taken to emails regarding this he accepted that they showed he was referring people to Client B. He said he probably referred several people to her. He agreed that passing Clients to Client B was outside the boundaries of the therapeutic relationship with her.

90. It was put to the Registrant that his emails change from being signed off with the word 'warmly' to 'love' with one or more kisses and that this was inappropriate, however he rejected this and said there was nothing wrong with signing emails in that way. He said he understood that Client B described a different experience of the therapy sessions, and he signed the emails with the word love as a sign of mutual trust in a therapeutic relationship. Regarding giving presents to Client B he accepted he had done so but said it was not inappropriate and he had given reasons for providing them. He accepted that the argument put forward by the UKCP was a good one but he still maintained that the provision of gifts was an acknowledgement of how Client B was doing in her therapy and she never once indicated that she was unhappy. He said certain of the items such as a teddy bear she found supportive. He denied giving Client B £5 and telling her to buy a Christmas drink and said he did not have his wallet in his therapy room however he then said that he did not have any particular recollection of this.
91. The Registrant was reminded of what Client B had said that she felt manipulated or groomed and there was a power imbalance. He said he had never groomed anyone in this in his life and he 'absolutely disagreed' with this and the suggestion that he was manipulating her. He agreed that that was a power imbalance but he never acted in any way to use or abuse this, rather he respected her and was generous in his work with her and supportive of her. He said Client B had plenty of opportunity to say she was not content with the therapy and there were many emails in which she was complimentary. It was suggested that the gifts and the free sessions over the years increased the imbalance between them but the Registrant said, 'I am not going to be persuaded, I disagree completely' and said all he ever wanted to do was be supportive and caring. He said he did not shower her with gifts, rather he gave some gifts to a very long-standing client. He did so in a human way to another person and it was appreciated. He again reiterated that he regretted the over-sharing, but he said that Client B had said 'don't leave me don't retire' and he responded to that. The Registrant said Client B was dissociated at times, she never wanted to end the therapeutic relationship and he did not see a need to refer her because being a therapist she could do this herself.
92. It was put to the Registrant that with someone such as Client B he needed more boundaries not less and he responded that Client B was doing as well as she could functioning both as a person and a therapist. He said the therapy was helping her to maintain her standard of living and with what she was dealing. He said he would not accept things he disagreed with. It was put to him Client B had said that she could not self-regulate as a result of what Registrant did to her and he said that the picture she presented both shocked and devastated him. He said that she had a history [REDACTED] which continued during therapy and he was doing his best to help her enjoy her best life as much as she could. He denied that his work triggered her he said that was untrue damaging and hurtful. He said that if he had not made a calamitous mistake of over sharing information when he himself was stressed, she might still be in therapy with him today. He said at the time there was no suggestion that she felt damaged or was damaged and that she was only saying this now. The Registrant said he had

'had enough of this it had been a hellish year and he totally disagreed with what Client B had said'. He said he had done his best for her respecting her humanity.

93. When asked about the emails that he sent to Client B the Registrant accepted that he sent hundreds of emails to her but he pointed out that they had been in a professional relationship for a long time and they had had about 299 sessions on a weekly basis. He did not accept the emails were of a personal nature. It was put to him that he sent an e-mail to Client B in which he referred to Client A (Bundle C2, p.1039) and he accepted this. It was suggested this was of a personal nature outside the professional relationship and it was unprofessional. The Registrant did not deny this and said he was dealing with something that shocked and devastated him and he had been wrong to send this e-mail to Client B. With regard to Allegation 15e calling Client B beautiful he said that he did not do so, rather he recalled referring to her as a beautiful person doing what she did in the circumstances of her life.
94. When asked if he touched Client B's neck, the Registrant said that he did not. He said he needed to consider the question of touch carefully with all clients because it might not be acceptable to some. He said that touch needed to be specifically explained, to clarify what he was doing and why. He conceded that Client B did not have a clear knowledge of his methods regarding touch before he did so. When asked if Client B consented to him touching her he said that if during the session she was activated or dissociated he would ask if it was okay to come close to her and touch her or for her to hold his wrists so that he could engage her to breathe properly. He said this was always discussed and negotiated. He said he did not know if she was dissociating at the time.
95. Regarding Allegation 15h inviting Client B to lie naked on cushions and Allegation 17 cuddling her on the floor he said, 'absolutely not', he did not accept this and said it did not happen. It was put to him that touching Client B's neck or lying naked with her or cuddling on the floor was all sexually motivated and he again said, 'absolutely not'. He again denied that he touched Client B's neck and said he put his hands around her neck region but there was no physical contact. When asked about Allegation 15i, asking Client B to the riverbank the Registrant denied this and said we discussed this earlier there is no lock on the riverbank.
96. Concerning Allegation 18a, disclosing information about Client A to Client B the Registrant said he accepted that he told Client B about Client A's complaint and told her that Client A was in therapy but he gave no details. It was put to him that Client B referred to Client A going to the riverbank with him and he said yes he agreed he had disclosed this. Further details set out in Client B's statement were put to him and he again agreed that he had disclosed some details concerning Client A. He agreed that Client B would only know any of this because he told her and he said it was wrong and inappropriate of him to say any of this, it was a big overshare. He said he had not simply blurted all this out, rather Client B had asked and he had felt obliged to share the information. He said he accepted that he had done this but he did not disclose personal identifying information about Client A. When asked about paragraph 18 of the Code he said he did not disclose personally identifiable information but he

accepted he had shared sensitive information and he said apparently and regrettably he had done so in breach of this part of the code.

97. When asked if he had disclosed information concerning his own health the Registrant said the Client B had been concerned about his welfare and he agreed that she had asked him if he had spoken to his supervisor but he could not remember this. It was put to him Client B was concerned about his own mental health and physical health and he said that he thought he had said he had had a stressful week. He said that he did not accept anything beyond what had been suggested in the e-mail referred to above (Bundle C2, p.1039).
98. When asked whether any of his conduct was inappropriate (Allegation 21a), the Registrant accepted that disclosing information about Client A's complaint and therapy was inappropriate but he rejected the suggestion that it was inappropriate to give gifts to Client B or send clients to her or make training suggestions in the way that he did. He said that he did not discuss his own mental health with her. When asked if his conduct was unprofessional (Allegation 21b) the Registrant made the same concession concerning the disclosure regarding Client A, but he reiterated that he did not disclose anything about his mental health and nor was the other conduct unprofessional.
99. Ms Upadhyay then went through Allegation 22 with the Registrant, and he accepted that his actions had compromised the therapeutic relationship with Client B and that in particular his e-mail regarding Client A was not in Client B's best interests. He conceded that he had caused her harm, sadness, confusion and anxiety but he said he did so in response to her inquiry. He maintained he was responsible. He said there was a reason for it at the time but he had acted wrongly it was his responsibility to make clear what could or could not be shared and he did not uphold this and he had regretted it every day since. It was suggested that the Registrant's actions had harmed Client B over seven years however he rejected this and said he had helped her maintain a quality of life and he found the suggestion that she could be cured of seven years of harm in eight sessions difficult to conceptualise. Regarding the e-mail concerning Client A, the Registrant accepted that he had been disrespectful to Client B in unburdening himself as he did and he failed to uphold the standards of the profession. He said he agreed that he had failed to meet the code and communicate in a way that was consistent with the code. It was put to him that his conduct and respect for both Client A and B was exploitive and for his emotional gain or because of the power imbalance and he simply said no. It was put to him that he was in a dual relationship with Client B as a therapist but also treating her as being in a position of someone he was training and making referrals to and he again said no.
100. In response to questions from the Panel the Registrant said that he did not take Client A to supervision because he felt it's more important to take other clients to supervision. He thought things were going OK with Client A. He said that other clients including Client B needed to be taken to supervision more. He said that he told his supervisor of the complaint in the six months after he had finished with Client A. He said at the time Client A had simply wished him well and that she wanted to

go to another therapist. He had disclosed this to his supervisor who had simply said OK but when the complaint came in he further informed the supervisor and he reported it to UKCP. He said he had been meeting his supervisor since these events.

101. When asked why he considered professional boundaries to be important the Registrant said they were there for health and safety and to ensure that practitioners are supported and working to standards. He said that the profession needed to be viable and ensure that people won't be abused and that there are mechanisms to uphold this.

102. The Registrant said Client B's initial concern was to be able to speak up in meetings but that was just part of the story. He said she had been working for an NHS agency, and she lacked confidence in a room with more experienced people. He said his initial response to her was to provide strategies to calm, relax and cope but subsequently Client B chose to leave that job. He said that this wasn't the initial focus but then as Client B shared multiple concerns he offered more resources and more approaches including EMDR, but she got activated. He said he did not focus on the abuse or ask for details since it was better to approach these things from the periphery.

103. When asked what he understood by a personal relationship the Registrant said that he understood this to be something distinct from a therapeutic relationship, it was social or friends or family or colleagues, which was different to the therapeutic relationship, where the parties share and engage in what they want from each other. Concerning qualifications and standards he said that it was important to abide by the standards and the rules and the procedures and the ethics of the profession and to show ultimate respect and regard to whoever the customer is.

104. In re-examination the Registrant said he could not recall now when the focus in Client B's therapy changed from being able to speak up in meetings to include other matters. He said he understood she chose to leave that particular role and she began to share more information with him as she trusted the therapeutic relationship more.

### **Resumed hearing (23 September 2025)**

105. Ms Hewitt advised that the Registrant would not be in attendance due to pressing family issues. She confirmed that she was not calling further evidence at this stage, she was making legal submissions. She said that she was instructed to continue in his absence and was satisfied that no unfairness was caused in doing so. On that basis the Panel was content to proceed to hear submissions from both Counsel and then move to consideration of the outstanding disputed facts.

### **Submissions on the facts**

106. Ms Upadhyay and Ms Hewitt both provided written submissions to the Panel which they then amplified in oral submissions.

### **Submissions by Ms Upadhyay on behalf of UKCP**

107. Ms Upadhyay reminded the Panel of the burden and standard of proof and the fact that there had been oral evidence from Client B and from EM who provided context to the evidence concerning Client A. She said that EM had not been called as an expert witness. Regarding Client B she said that she was credible and consistent in her oral evidence and this was consistent with her witness statement. She said her distress was not exaggerated and she had provided the best evidence she could, including how her therapeutic relationship with the Registrant had impacted upon her. She submitted that where there was a conflict in the evidence Client B's evidence was preferable to the Registrant's. She said this was because the Registrant's evidence had evolved as he gave it to the position where he accepted some of the points put to him.
108. Regarding Allegation 1a Ms Upadhyay said that the Registrant had conceded that he had to maintain the boundaries between his professional actions and his actions in a personal capacity and she said that he had accepted many of the emails were not relevant to the therapeutic relationship. He had conceded some emails where quite intimate exchanging kisses talking of love comments regarding clothing and so forth and sending fifteen emails overnight. She said all of this was purely personal and the Registrant had agreed they were personal and that he should have put better boundaries in place he had agreed that he had a personal relationship with Client A and that he would have advised another professional that what he had been doing was wrong. Concerning Allegation 1c Ms Upadhyay also said many of the emails were unnecessary for a therapeutic relationship concerning details about the Registrant's [REDACTED], birthday plans, [REDACTED] travelling with a friend. She said they were all personal or about his life. She said that he had agreed that these were personal disclosures in his evidence. Looking at Allegation 14b Ms Upadhyay said that the Registrant had admitted he had concerns that Client A would disclose his name but denied that he was concerned about his reputation. However, she pointed out that this was exactly what Client A said it was about and the Registrant had said he was panicking having his name mentioned in a small community where he was supervising people. She said it was a clear inference that the Registrant was indeed concerned about what others would think about him and that he was clearly worried "panicked" about his reputation particularly if Client A spoke to a third party who he was supervising.
109. Concerning Client B Ms Upadhyay said that it was clearly a personal relationship. The emails that were not signed professionally, they were sent out of hours, he had given her presents and Client B had thought that she was being manipulated or drawn into an abusive relationship. Ms Upadhyay said that the nature of the relationship was clearly a dual one this was evidenced by the gifts the emails the referrals and, although it was not sexual and may not even have been a friendship, it was clearly outside the single purpose for which she had attended the Registrant. She said that the Registrant had accepted some of his emails were referrals for Client B's professional benefit and he agreed these were outside the boundaries of the professional relationship because he was not her mentor or supervisor. Client B had said the referrals were unsolicited whereas the Registrant said he

could not now remember whether Client B had suggested this or not but in any event he had agreed it was not part of the therapeutic goal.

110. Turning to the emails, Ms Upadhyay said that the Registrant accepted that he had sent and received them but denied that they were personal save for the e-mail exchange regarding Client A. This latter e-mail exchange was admitted by the Registrant to have been outside the professional relationship and unprofessional and something he should not have done. Ms Upadhyay said it might be suggested that the emails were less personal than those sent Client A and she submitted this was not relevant. The key concern was, was there an exchange with Client B about a complaint made by a Client A. This was entirely unprofessional and inappropriate. She said this was not a trivial matter and the Registrant had agreed that his conduct was inappropriate and unprofessional. As to the allegation that he had called Client B beautiful, Ms Upadhyay said Client B had confirmed this in her oral evidence whereas the Registrant said he had called her a beautiful person but also said he could not remember everything he had said.

111. Regarding Allegations 15g, h and 17, Ms Upadhyay said that Client B had been clear in her written and oral evidence. She said the Registrant had claimed all touch was negotiated and that EM had said that in her practise it was OK to hug a Client if it was requested or, she might suggest this if the Client needed it and wished it to happen but it was always negotiated and agreed. She submitted this was significantly different to Client B's description of being dissociated, sweating, unable to move and the Registrant making physical contact. She said Client B's description did not suggest she knowingly and properly consented to touch by the Registrant. Concerning the incident of him allegedly placing his hands around her neck and the reference to lying naked Ms Upadhyay said Client B was clear in her description of these events and in particular her description of the Registrant saying they could lie in a non-sexual way. On these occasions Client B had described herself as remaining quiet not having the capacity to run and the Registrant making her feel she had done something wrong. She submitted that all these matters were proved by clear and credible evidence which differed from the Registrant's version of events when he said he could not recall everything.

112. Concerning the alleged invitation to the riverbank (Allegation 15i) Ms Upadhyay said that much was made of the fact that Client B referred to a lock and the Registrant said there was no lock. Ms Upadhyay said this was somewhat of a red herring the issue was whether there was an invite. She said the Registrant had described nature work as being important and he had asked Client A to the riverbank and had a session with her there. From this she said it was plausible Client B would be asked in the same way and if she had made a mistake about a lock it did not damage her evidence entirely.

113. Ms Upadhyay said that in respect of Allegation 18a and b, the Registrant denied the detail about Client A but admitted he had made personal disclosures about the impact of Client A's complaint against him. She pointed to the written evidence in the Registrant's own statement and Client B's statement. She said what was quite apparent from Client B statement was that she was clearly relating



what the Registrant had told her about Client A. She said there were details within this that Client B could only relate if the Registrant had told her. She submitted that the Registrant told Client B about Client A's therapy her financial difficulties and about the complaint. She said the Registrant had conceded that he had said he had had a stressful week but if one looked at Client B's statement she described the Registrant telling her about his mental health and including that he had not told his supervisor. This last point was corroborated by what the Registrant had said. Ms Upadhyay said that Client B had no reason to make any of this up she was a therapist herself and was genuinely concerned about the Registrant.

114. Concerning allegations 21 and 22 she said that some of these were linked. She said that the Registrant had admitted that his conduct regarding Client A was both inappropriate and unprofessional but he had denied this in respect of Client B. She said the UKCP relied upon Client B's written and powerful oral evidence regarding the Registrant's conduct attitude and her description of the emails and so forth. She said that the Registrant's position changed and he accepted that it had been inappropriate and unprofessional for him to share information concerning Client A to Client B. As to Allegation 21c, Ms Upadhyay said that any issues of sexual motivation had been discontinued in respect of Client A but there were a number of incidents of physical touch with Client B. These were neither appropriate nor consented to by Client B. The issue for the Panel was whether it could safely draw an inference from the actions described to conclude that they were sexually motivated. She reminded the Panel that Client B had said she felt manipulated and that she was in an abusive relationship. She said there was no sexual intercourse but this did not determine whether actions were sexually motivated from the Registrants perspective.

115. Looking next at Allegation 22, Ms Upadhyay said that the Registrant had admitted his actions were not in the best interests of Client A but denied this in respect of Client B. However, she said Client B had been very clear in her written and oral evidence, sharing details that were difficult to hear regarding how he compromised the therapeutic relationship. She said Client B had been shocked and scared that the Registrant would disclose details about her to others and that the Registrant broke Client B's trust in him. She said all of this had not been in Client B's best interest. In addition, the Registrant had accepted he did not check or review the goals for which Client B attended therapy he compromised the relationship with her and the conversations he had had were not in her best interests.

116. Concerning the allegation that the Registrant failed to respect Client A and B, Ms Upadhyay said that the UKCP relied upon the e-mail correspondence concerning Client A and all the evidence concerning Client B. She said that the Registrant had accepted that in unburdening himself to Client B he had been disrespectful to her however she said that doing this was also disrespectful to Client A. Concerning Allegation 22c, Ms Upadhyay said that if the Panel accepted Client B's evidence and the way that she described the physical touch from the Registrant then it was clear that she did not consent and at times was unable to consent because she was dissociated. If this was their conclusion

then it was clear that he did not respect her autonomy. Ms Upadhyay said that the Registrant did not do as EM suggested when gaining consent for physical touch. She said the Registrant had claimed everything was done properly but it was quite clear that none of this was set out from the start and that Client Bs goal of being able to speak in public did not require physical touch from the Registrant. Looking next at Allegation 22e and the suggestion that the Registrant had abused or exploited his relationship with his clients for gain, Ms Upadhyay said that there was a clear emotional gain in respect of Client A. By the Registrant's own admission the relationship was a dual one and his emails could only have been for his own emotional gain. Concerning Client B she said this was not a purely therapeutic relationship Client B had said there was an imbalance of power in which she felt groomed but she said that the Registrant himself was sending information that he should not have sent and was exploiting Client B and not imposing boundaries as he should have done.

117. Looking next at the allegation of whether any of this had caused harm, Ms Upadhyay said that the Registrant admitted he had caused harm to Client A but denied this in respect of Client B. However, Client B had clearly set out both in writing and in her oral evidence the harm she felt which included being manipulated, groomed, unable to regulate and of course receiving the e-mail that she should not have received regarding Client A. She described the lack of trust, her concern for the Registrant and the worry he would disclose information about her to others. Ms Upadhyay said this was clearly evidence of harm to Client B.

118. As to the issue of a dual relationship this was admitted in respect of Client A and in respect of Client B. Ms Upadhyay I said there was the clear creation of a power imbalance and the Registrant purported to act in a supervisory role contrary to the boundaries that should have been in place. He confused the therapeutic relationship. Concerning breaching Client A's confidentiality, the Registrant strenuously denied this however whilst he maintained that he did not disclose identifiable information, he admitted that he had disclosed confidential or sensitive information concerning Client A's therapy finances and so forth. She said this was a clear breach of clause 18 of the code. Regarding upholding the reputation of the profession, Ms Upadhyay said the Registrant had conceded he did not do so in respect of Client A but she said that disclosing information about Client A to Client B was also a failure to uphold the reputation of the profession. She said that there had been a fundamental violation of Client A's confidentiality but, if the Panel was satisfied that other allegations were proved then the Registrant had also failed in these aspects. Turning finally to the issue of communications consistent with the code she said the Registrant had conceded he had not done so with respect to Client A but he denied this with respect to Client B. She said one only had to look at the hundreds of emails the content the volume the kisses the complaint about another Client the disparaging remarks and Client B's description of all these emails to conclude that they were inappropriate and unprofessional and inconsistent with the code.

**Submission by Ms Hewitt on behalf of the Registrant**

119. Ms Hewitt also reminded the Panel that it was for the UKCP to prove their case and she said that the Registrant's evidence had been insightful and thoughtful. She said there had been a substantial change in the UKCP case by the removal of the sexual allegations concerning Client A and the refusal to admit her statement. Had this occurred as an earlier date that may have been more admissions made by the Registrant. She said they had never been any evidence to support the sexual motive allegation regarding Client A. Regarding Client B she said that UKCP still pursued this but that again there was no evidence of sexual motivation and the UKCP was now left to simply say the Panel should look for an inference. She said that Client B had not suggested any sexual motivation and it was only when she was asked about it and in hindsight that she thought she had been groomed. However, even this she said was about power and not sexual motivation. Ms Hewitt said there was no evidence provided by any witness to suggest there was a sexual motivation and there was no evidence regarding any sexual aspects at all.

120. Ms Hewitt submitted that the correct approach was for the Panel to make findings of fact in Allegations 1 to 20 and then apply Allegations 21 and 22 to those facts. She said that the Registrant had made realistic concessions once the shape of the case was determined. She said that the Panel should examine the emails on the oral evidence and then there was some differences and or similarities regarding the allegations for both Clients. Regarding Client A she said the Registrant had accepted he was not as boundaried as he should have been. He had described paternal feelings and transference and wanting to affirm Client A and give her fatherly care. He had accepted that he was not boundaried in this and he should have been. She said this was personal and not sexual. She said the Panel should note that the UKCP had said this was primarily personal. Ms Hewitt said that the Registrant's description of the emails as being not boundaried was probably correct and that he had probably allowed his work as a psychiatric nurse to influence what he had been doing using this to inform his therapy. She submitted that the Registrant's evidence and his admissions suggested he does know where the boundaries ought to have been.

121. Concerning Client B Ms Hewitt reiterated that there was no evidence of anything sexual in the relationship. She said there were fewer emails compared to Client A but it was the content that mattered and she noted that these cover a period of seven years. She said the Registrant had admitted he was not as boundaried as he should have been and she said that seven years was probably too long to hold a therapeutic relationship with a person who had such manifest and complex issues as Client B. She said Client B was also a therapist and the Registrant has started to see her in that light but that he clearly respected her because he referred clients to her. In addition, he sought to assist her training. She submitted that the Registrant saw Client B as an intelligent woman working in the same field as him and that in so doing he had not kept the boundaries as he should have done. Ms Hewitt said the Client B was clearly rattled by the complaint made by Client A and on seeing the Registrant upset she pressed him for detail and he provided her with that detail. She said that he should not have done so and he blurred the boundaries with a fellow practitioner and client. She reiterated that he disclosed

the nature of the complaint but not the identity of the complainant and it was important to distinguish between those two factors.

122. Ms Hewitt said that she relied upon her written submissions regarding other of the allegations albeit she recognised the UKCP did not agree with the limitations that she set out in those written submissions. She said there was some significant double counting when looking at for example Allegations 1b and c. She submitted that disclosing information concerning someone's health whether it was his or his mother's when re arranging a meeting with a client was not unreasonable and not unprofessional. Regarding Allegation 15 she said he had admitted he was concerned about the disclosure but not about the impact upon his reputation. As to the remaining allegations she said that the Panel should consider the physical environment of the shed at the bottom of the garden, taking this into account, how likely was it that the events complained of would occur in the shed in the garden with his wife in the house. She said that EM had said practitioners do engage in touch although she was not in the place of an expert. She said that the Registrant was not charged with touching a client without consent but was said to be touching her in an allegedly sexual way. She said the highest point of this was the allegation that he had suggested Client B should lie naked but even her evidence was that it would be done in a non-sexual way.

### **Determination of Facts**

123. The Panel considered all of the documentary evidence before it and heard oral submissions from Ms Upadhyay on behalf of UKCP and Ms Wendy Hewitt on behalf of the Registrant.
124. The Panel also heard evidence from the following witnesses: Client B, EM and the Registrant.
125. The Panel heard and accepted the advice of the Legal Assessor.
126. On balance, having fully considered the above, the Panel made the following findings:

#### **Allegation one**

Between 3 January 2023 - 5 January 2024, while being in a therapeutic relationship with Client A, you:

- a. entered into a personal ~~and/or sexual~~ relationship with Client A;

#### **Denied, admitted in evidence. Found proved**

The Panel was of the view there were many emails to support the conclusion that the Registrant did not stick to professional issues in his interaction with Client A. Emails dealt with personal issues, social issues such as fishing trips, birthdays, poetry and more. They also confirmed communication in personal terms suggesting love and friendship. On one occasion the Registrant sent fifteen emails to Client A over the course of a Saturday, which

is not in the course of normal working hours. All these communications breached the boundaries of the therapeutic relationship. The Registrant's admission confirmed this.

- b. exchanged hundreds of emails with Client A, including emails of an intimate and personal nature (**Appendix A**);

**Admitted and found proved by way of admission**

- c. on one or more occasions, discussed your personal issues with Client A, including your health concerns ~~and marital issues~~;

**Denied, admitted in evidence. Found proved**

The Panel determined that the Registrant sent many emails in which he disclosed information of an intimate and personal nature. It rejected the suggestion made by Ms Hewitt that the emails disclosed information to arrange appointments with Client A. They went far beyond this. For example, communication about the Registrant's mother was not simply confined to the fact that she was unwell but included further detail and information. The e-mails sent by the Registrant were indicative of a discussion between friends and it was not the information that would be provided by a professional for the purposes of arranging appointments.

- d. on one or more occasions, offered Client A longer sessions and/or additional sessions at no extra cost;

**Admitted and found proved by way of admission**

- e. on one or more occasions, suggested excursions you could take with Client A outside of sessions.

**Admitted and found proved by way of admission**

### **Allegation Two**

Between September 2023 - December 2023, during one or more sessions with Client A, you touched Client A. In particular, you:

~~a. stroked Client A's face and body;~~

~~b. stroked Client A's breast;~~

~~c. kissed Client A's forehead;~~

- d. hugged Client A.

**Admitted and found proved by way of admission**

### **Allegation Three**

In June 2023, you arranged with Client A that she would water your garden whilst you were on holiday, in exchange for a free therapy session.

**Admitted and found proved by way of admission**

#### **Allegation Four**

On 28 September 2023, you:

- a. invited Client A to meet you at a riverbank;  
**Admitted and found proved by way of admission**
- b. spent around one hour with Client A at the riverbank.  
**Admitted and found proved by way of admission**

#### **Allegation Five**

On 16 November 2023, you:

- a. invited Client A to meet you at a lake where you were fishing;  
**Admitted and found proved by way of admission**
- b. spent several hours with Client A at the lake;  
**Admitted and found proved by way of admission**
- ~~c. hugged Client A;~~
- ~~d. told Client A she was “beautiful” as she was leaving, or words to that effect;~~
- e. sent emails to Client A saying, “You are a wonderful woman” and “You were wonderful company” (**Appendix A, page 203**).  
**Admitted and found proved by way of admission**

#### **Allegation Six**

On 17 November 2023, you:

- a. told Client A that she could join you on the bank side where you were sitting;  
**Admitted and found proved by way of admission**
- b. spent around 20 minutes with Client A at the bank side.  
**Admitted and found proved by way of admission**

#### **Allegation Seven**

On 22 November 2023, you sent an email to Client A saying, “And me you [Client A]. Xxx” in response to Client A’s email saying, “Love you xxx”).

**Admitted and found proved by way of admission**

#### **Allegation Eight**

On 30 November 2023, you sent an email to Client A saying that you missed her.

**Admitted and found proved by way of admission**

#### **Allegation Nine**

On 5 December 2023, you sent emails to Client A saying, “Wonderful to see you [Client A]. Thank you. I experience you to be an absolute privilege to know. Lovely you. Love Stephen Xxxx” and “Love you”.

**Admitted and found proved by way of admission**

**Allegation Ten**

On 8 December 2023, during a session with Client A, you:

- ~~a. hugged Client A whilst lying next to her on the floor;~~
- ~~b. climbed on top of Client A and told her that you wanted to “ravish” her, or words to that effect;~~
- ~~c. asked Client A if you could love each other and you still be her therapist, or words to that effect;~~
- d. sent an email to Client A saying, “I feel my love of you. It is indeed strong. I find myself wanting to say much. And if I may will attempt to, face to face when we meet. I thought you were beautiful tonight. You are indeed beautiful in so many ways. Thank you. Lovely you. Love Stephen Xxxx”.

**Admitted and found proved by way of admission**

**Allegation Eleven**

From 9 December 2023 onwards, on one or more occasions, you attempted to encourage Client A to continue your personal and/or therapeutic relationship.

**Admitted and found proved by way of admission**

**Allegation Twelve**

~~On 10 December 2023, during a session with Client A, you:~~

- ~~a. hugged Client A whilst lying next to her on the floor;~~
- ~~b. stroked Client A’s body;~~
- ~~c. told Client A, “We don’t always have to do therapy, sometimes we can just lay here and talk”, or words to that effect.~~

**Allegation Thirteen**

On 11 December 2023, you sent an email to Client A saying, “I worry that somehow my name will be brought into your meeting and that scares me. I would rather end my role as a therapist than be drawn into my name being shared”.

**Admitted and found proved by way of admission**

**Allegation Fourteen**

On 5 January 2024, during your final session with Client A, you:

- ~~a. blamed your actions on Client A;~~

- b. **expressed concerns that Client A would disclose your name to her new therapist and therefore damage your reputation.**

**Denied (1<sup>st</sup> limb accepted, 2<sup>nd</sup> part denied). Found proved**

The Panel noted the distinction made by the Registrant in being concerned about his name being disclosed to other persons and being concerned about his reputation. He conceded the first part but denied the second. The Panel rejected this distinction and noted that the Registrant had disclosed in emails that he was worried Client A would disclose his name to another therapist and that scared him. He said he would rather end his role as a therapist than have his name shared. Client A was clear in her understanding of this, namely that the Registrant was concerned about his reputation. It was in the Panels view clear that the Registrant wanted to manage the fallout from what had occurred, and what he was engaged in was 'damage limitation'. It was clear he was worried what people would think about him, and in this regard he was worried about his reputation and such damage as a complaint may cause in a small community.

#### **Allegation Fifteen**

Between 11 May 2017 to 11 July 2024, while being in a therapeutic relationship with Client B, you:

- a. entered into a personal relationship with Client B;

**Denied – Found proved**

In pursuit of proving this allegation UKCP rely upon emails and gifts given by the Registrant to Client B. There were many such gifts and she said it made her feel uncomfortable. In addition, the Panel noted that the Registrant offered to accompany Client B [REDACTED]

[REDACTED] In the Panel's view this was clearly the action of someone acting as a friend and not in a professional capacity. Furthermore, the Registrant referred clients to Client B and was in effect treating her as a colleague. The same may be said of forwarding training references to her. In addition, the Registrant offered or gave Client B boxes of crockery and a chair. All of these are examples of a personal relationship some of which may have been collegiate in nature but all of which was outside the professional relationship the boundaries of which the Registrant failed to uphold.

- b. exchanged hundreds of emails with Client B, including emails of a personal nature (**Appx. B**);

**Denied (partial admission in evidence) – Found proved**

The Panel took note of the Registrants partial admission concerning the emails that he exchanged with Client B, but it also noted that there were hundreds of emails of a personal nature. One such was his offer to accompany Client [REDACTED] another was disclosing his concerns regarding a complaint made by Client A.

- c. on one or more occasions, gave gifts to Client B;

**Admitted and found proved by way of admission**



- d. on one or more occasions, offered Client B additional sessions at no extra cost;

**Admitted and found proved by way of admission**

- e. on one or more occasions, called Client B “beautiful”;

**Denied – Found proved**

Client B was clear and consistent in her recollection that the Registrant called her beautiful. The Registrant conceded that he called her a beautiful person or a beautiful soul or a beautiful woman but otherwise could not recall particular detail and on occasion he sought to bolster his memory of events by looking at his statement. The Panel concluded that it was more likely than not that the Registrant did call Client B beautiful whether or not he added further comment to that epithet on some occasions

- f. on one or more occasions, held Client B;

**Denied (partial admission) Found proved**

By the close of the evidence, it was clear that the Registrant did not dispute that there were occasions when he held Client B. What was in dispute was some of the detail. Client B gave clear and comprehensive evidence regarding occasions when she had been held including for example when she described the Registrant holding her neck or holding onto her tightly when she was lying on the floor.

The Registrant said he had been experimenting concerning his approach to her neck and when Client B was discomforted he said it did not work. He appeared to concede that his holding did not seem to be therapeutic. The evidence led the Panel to the conclusion that the Registrant did not ask Client B what she needed in the way the witness EM described. Rather he employed what he thought was the correct approach regardless. An example of this was when Client B tried to stop him from holding her and he held her tighter. The Panel noted the graphic description of Client B’s distress as set out in her statement and when she was lying on the pillows.

The Panel was of the view that the Registrant was not enamoured of his clients, rather he was enamoured of his own model of practise, which at times appeared experimental. In doing this the Panel concluded that the Registrant acted for his own emotional benefit rather than any sexual motivation. The Panel noted that learning and gaining information was important to the Registrant and it appeared that the Registrant was on occasion testing such learning and information experimentally. These appeared to be his drivers and in such, his actions were egocentric and self-affirming.

- g. on one occasion, put your hands on Client B’s neck unsolicited;

**Denied – Found Proved**

In her written statement and in her oral evidence Client B gave a clear and consistent account of the incident and its aftermath. She spoke in detail in a clear and spontaneous way when questioned. Client B explained that at the time she was dissociated which was a detail the

Registrant agreed with albeit he denied that he ever did this. However, he did accept that he puts his hands in the region of her neck. The Panel found Client B's description of events to be compelling and persuasive and it was satisfied on the balance of probabilities that this event occurred in the way that she described.

- h. on one occasion, invited Client B to lie with you naked;

**Denied – Found proved**

Once again the Panel found Client B's description of events to be compelling and persuasive. The Registrant said that he would sometimes work sitting on cushions on the floor and in the view of the Panel this was not so dissimilar to lying on the cushions. The Panel was of the view that this was likely to be another example of the Registrant experimenting in his treatment. A notable detail provided by Client B was that she expressly said that if they were to lie naked, it would be in a non-sexual way. There would be no reason for Client B to add this detail if the Registrant's motivation were to be sexual, or she were making this up. The Panel considered this to be a detail which lent weight to the measured and credible way that she gave evidence and there was no reason for her to make this up.

- i. on one occasion, invited Client B to meet you at the riverbank;

**Denied – Found proved**

The Panel noted that the Registrant invited Client A to the riverbank and that he conducted what he considered to be a session there within that there was referenced to a locked gate. The Registrant denied inviting Client B to the riverbank and was critical of her reference to a lock at the access point to the riverbank. However, the Panel noted that despite this denial, in e-mail correspondence with Client A the Registrant specifically referred to a gate with a lock. The Panel considered it more likely than not that the offer of a walk by the riverbank was something that the Registrant did with clients including Client B. Again, the Panel could not discern any reason why Client B would make this up or that she would make up a detail concerning a lock if it were not said by the Registrant.

- j. on one or more occasions, referred prospective Clients to Client B in her capacity as a counsellor.

**Admitted and found proved by way of admission**

**Allegation Sixteen**

On 14 June 2024, you offered to accompany Client B to medical appointments.

**Admitted and found proved by way of admission**

**Allegation Seventeen**

On one occasion in or around January 2020, you cuddled and held Client B whilst you lay together on the floor. When Client B tried to move away from you, you continued to hold her.

**Denied – Found proved**

As stated above when it came to detail of events such as this, the Panel found Client B to provide distinct, measured and credible evidence. She was clear in her description of what had occurred and in the aftermath, the impact of these events upon her. Conversely, the Panel found the Registrant to be less convincing and likely to be reciting what he thought he ought to have done as opposed to what he actually did. The Panel accepted the version of events provided by Client B as more likely to be an accurate portrayal of the incident alleged.

**Allegation Eighteen**

On 11 July 2024, during a session with Client B, you:

- a. told Client B about Client A's therapy and the complaint that Client A had made to UKCP;

**Denied (partial admission) – Found proved**

Whilst the Registrant accepted that he mentioned Client A in correspondence with Client B he denied providing the detail alleged. However, Client B was quite clear about this and gave consistent evidence as to the detail concerning therapy and Client A's complaint as relayed to her by the Registrant. It was plain that the Registrant had talked to Client B about Client A's complaint doing so in an e-mail in July 2024. Client B also said that the Registrant had told her about when Client A was invited to the riverbank it was cold. This small detail accorded with Client A's account of going to the riverbank and being told by the Registrant to wrap up. The existence of details such as this lent weight to what Client B said. Client B also explained that the Registrant had told her about another client whose husband had ECT. It was a reasonable inference to draw that because the Registrant talked about other clients on occasion he also talked about Client A to Client B. By the end of his evidence the Registrant conceded that he did provide information about Client A albeit it was insufficient to identify her. Whilst it may be that the Registrant did not identify Client A, her anonymity was all the more precarious in the small community in which the Registrant worked.

- b. made personal disclosures to Client B about the impact of Client A's complaint on your mental health.

**Denied – Found proved**

In her witness statement and in her oral evidence Client B spoke of the Registrant as panicking and entertaining suicidal thoughts. She was concerned about him and she sent him an e-mail to express this concern. The Registrant responded that he was stressed and that 'Tuesday needed to be done' which appeared to relate to the complaint. The Panel considered Client B's concern to be genuine and it was based upon what the Registrant had told her. The Panel also noted that the Registrant said he had told Client B it was a stressful week, that he had over shared with her but he had done so because he thought that she could 'hold it'. Once

again, the Panel considered Client B's recollection and description of events to be more reliable and it was satisfied that the Registrant did make personal disclosures to Client B regarding the impact of Client A's complaint upon him.

#### **Allegation Nineteen**

On 14 July 2024, you sent an email to Client B and signed off, "Dare I say with love ? Steve xxx".  
**Admitted and found proved by way of admission**

#### **Allegation twenty**

You did not report your actions at paragraphs 1 - 19 above to UKCP.  
**Admitted and found proved by way of admission**

#### **Allegation Twenty-One**

Your actions at paragraphs 1 - 20 above were:

- a. inappropriate; and/or

**Admitted re Client A and found proved by way of admission**

**Denied re Client B – Found proved**

The Registrant made limited concessions regarding his actions towards Client B including that he had provided information to her about Client A and accepted that this was inappropriate. The Panel has also found a number of disputed facts proved as described by Client B Including the discussion of personal family and health matters, the giving of gifts signing emails with personal and/or affectionate comments as well as comments made during therapy and actions taken in therapy. Each of those matters proved in Allegations 1 to 20 were in the view of the Panel inappropriate. There were numerous breaches of boundaries and the conduct was not that expected of a registered professional.

- b. unprofessional; and/or

**Admitted Re A and found proved by way of admission**

**Denied re Client B – Found proved**

The Panel adopted the reasoning set out immediately above. It considered that the Registrant breached the standards expected of him and he should at all times have been aware of this. Instead, he appeared unable to accept or understand why he made Client B feel unsafe and why his conduct was so unprofessional. It was particularly notable that he did not even appear to know that he should have reported his conduct to the UKCP, and the Panel was of the view that he flouted the Code of Ethics in an almost narcissistic way. His offering of extra sessions with no cost implications, meeting outside sessions, giving gifts, all of this conduct was undertaken with two vulnerable clients, and could have or did have an adverse impact upon them. The Registrant's lack of professionalism was exacerbated by the fact that he did not take these Clients to supervision, or if he did it was not in a detailed and meaningful way.

It was notable that the Registrant said he recognise that the emails were wrong and he should have undertaken supervision, but he did not do so.

- c. sexually motivated.

**Withdrawn regarding Client A – Found not proved**

**Denied re Client B – Found not proved**

The Panel was of the view that there was nothing in the evidence to support the conclusion that the Registrant's conduct was undertaken with sexual motivation. Rather the Panel determined that his conduct was a matter of his own self-importance and, through experimentation, to prove his own methodology worked. The high point of any allegation of sexual motivation was that of the invitation to lie naked on pillows but even in that respect Client B said the Registrant made it plain that this was to be non-sexual. Client B never reported this to have sexual overtones or appear sexually motivated. The Panel was of the view as stated above have the Registrant's conduct was not sexually motivated.

### **Allegation Twenty-Two**

The behaviours set out at paragraphs 1 - 21 above are in breach of UKCP's Code of Ethics and Professional Practice (2019) (the Code). In particular, you:

- a. failed to act in Client A and Client B's best interests, thereby breaching clause 1 of the Code.

**Admitted re Client A and found proved by way of admission**

**Denied re Client B – Found proved**

The Panel considered that there was ample evidence to conclude that the Registrant did not act in Client B's best interests. She gave evidence of the harm and distress caused to her, how she felt groomed and unable to express her views, she was sad, anxious and confused. None of this was in her best interests. Developing a non-therapeutic relationship with Client B whether as a friend or whether as some form of colleague or mentor was also not in Client B's best interests. It is in any client's best interest to have boundaries and in sending emails on all sorts of topics at all sorts of hours the Registrant went way beyond the boundaries he should have kept. The Panel noted that both Client A and Client B were significantly emotionally harmed by the Registrant and both had undertaken further therapy to deal with the harm he caused to them.

- b. failed to treat Client A and Client B with respect, thereby breaching clause 2 of the Code.

**Denied re Client A – Found proved**

**Denied re Client B – Found proved**

In continually contacting Client A and Client B in the way that he did the Registrant did not treat them as autonomous persons and did not allow them to decide how much contact they wished to have. In addition, Client B's description of being held tightly when she wanted to get away from the Registrant, being dissociated and unable to properly consent to being touched, and the sharing of Client A's details to Client B, all of this was indicative of the Registrant imposing his own actions upon them treating neither of them with respect,

- c. failed to respect ~~Client A and~~ Client B's autonomy, thereby breaching clause 3 of the Code.

**Denied re Client A – withdrawn - Found not proved**

**Denied re Client B – Found proved**

The Panel adopts the reasoning set out immediately above and in particular it noted that Client B said she was dissociated at times during the sessions, something that the Registrant confirmed. The Panel found little evidence to suggest that Registrant had the skills to deal with what Client B was experiencing and he did not deal with it. The Panel also noted that while the Registrant appears to be highly qualified and trained he did not stay attuned to the therapeutic needs of Client B.

- ~~d. had sexual contact or a sexual relationship with Client A, thereby breaching clause 4 of the Code.~~

- e. abused and/or exploited your relationship with Client A and Client B for any purpose including your sexual or emotional gain, thereby breaching clause 5 of the Code.

**Denied re Client A – Found proved**

**Denied re Client B – Found proved**

In respect of both Client A and Client B the Panel was satisfied that the Registrant appeared to get emotive gain from his interactions with them. The Panel was of the view that he was emotionally attached to his clients, rather more than they were attached to him. The Registrant admitted that there were elements of transference in respect of both clients and in respect of Client A that he was acting in a fatherly way. He knew of that attachment and should have acted with caution and taken Client A and or Client B to supervision but he did not do this. In addition, he was clearly using them to validate the model of practise he espoused. In this way the Panel considered the Registrant did indeed exploit both clients for his own gain and he did not keep to the boundaries that he should have upheld.

- f. harmed Client A and Client B, thereby breaching clause 6 of the Code.

**Admitted re Client A and found proved by way of admission**

**Denied re Client B – Found proved**

The Panel noted that both Client A and Client B reported suffering harm. Both explained that they had undertaken further therapy to deal with that harm. It was plain that the Registrant gave them things to worry about [REDACTED] Client B explained she felt that she had to manage this. The Panel was of the view that what the Registrant did caused confusion stress and distress to Client B in the same way that it did to Client A.

- g. engaged in a dual relationship with Client A and Client B, thereby breaching clause 8 of the Code.

**Denied re Client A      admitted in evidence – Found proved**

**Denied re Client B – Found proved**

The Panel was of the view that the plethora of emails sent by the Registrant to Client B was ample evidence of a dual relationship with her. His emails were almost constant on occasions. There was no written or clear verbal contract with Client B and no obvious boundaries. Such professional boundaries as there ought to have been were breached repeatedly and for a

considerable period of time. It was plain to the Panel that the Registrant regarded Client B both as a friend and as a potential colleague and not just as a client.

~~h. failed to exercise all reasonable care (taking into account the time that has elapsed since therapy ended) before entering into a personal relationship with Client A and Client B, thereby breaching clause 9 of the Code.~~

- i. failed to respect, protect and preserve Client A's confidentiality, thereby breaching clause 18 of the Code.

**Denied re Client A – Found proved**

It was plain on the evidence presented that the Registrant did disclose details about Client A to Client B and indeed he conceded this by the end of his evidence. Whilst it may be that he did not disclose Client A's name or sufficient information to identify her, that was no excuse for what he did. He shared sensitive information about her. Sharing any information about Client A was a breach of her confidentiality and doing so in the small community referred to by the Registrant made that breach more serious.

- j. failed to act in a way which upholds the profession's reputation and promotes public confidence in the profession and its members, including outside of your professional life as a UKCP practitioner, thereby breaching clause 32 of the Code.

**Admitted re Client A and found proved by way of admission**

**Denied re Client B – Found proved**

The Panel has already expressed the view that at all of the above conduct was inappropriate and unprofessional. It is not conduct the public would expect of a registered professional and as such it brought the reputation of the profession into disrepute and undermined public trust in the profession. The Panel asked itself whether a member of the public would refer someone to the Registrant if that member of the public was aware of these findings of fact. The Panel was of the view that they would not.

- k. communicated with Client A and Client B in a manner inconsistent with the Code, thereby breaching clause 34 of the Code.

**Admitted re Client A and found proved by way of admission**

**Denied re Client B – Found proved**

It was clear to the Panel that the volume content and style of the Registrant's communication was unprofessional and did not uphold the standards expected of the profession. They were inconsistent with the style of communication expected of the Registrant. It was notable that Client B said she did not like to receive the emails and frequently did not read them. It was of concern that the Registrant did not accept the criticism levelled at his mode of communication with Client B.

- l. failed to report potential breaches of UKCP's Code of Ethics and Professional Practice to UKCP, thereby breaching clause 37 of the Code.

**Admitted re Client A and found proved by way of admission**

**Admitted re Client B and found proved by way of admission**

The Panel noted that the Registrant did not report any of these events concerning Client A or Client B to the UKCP indeed it appeared he did not think he should do so.

127. In total the Panel found 18 breaches of UKCP's Ethical Principles and Code of Professional Conduct proved.

### **Resumed Hearing (21 October 2025)**

128. At the start of resumed hearing the Panel was informed that the Registrant would not be attending. The panel was aware that he had submitted written documentation.
129. The Panel handed down its decision on the facts and then granted time to Ms Hewitt and Ms Upadhyay to obtain further information or instructions and to consider the situation. Following this and after hearing advice from the Legal Assessor the Panel was of the view that it would not be fair or appropriate to proceed in the absence of the Registrant.
130. The Panel recognised that the Registrant was absent through no fault of his own and that he faced very difficult personal circumstances. To proceed with the case would be to put him at a serious disadvantage which is contrary to the overarching objective of a fair and inclusive hearing. The Panel noted that the public and/or the public interest are protected by an Interim Suspension Order (ISO) which continues until 14 January 2026.
131. The Panel determined that the case should be relisted as soon as the Registrant's personal circumstance allow taking account of the date on which the ISO expires.

### **Resumed Hearing 1 December 2025**

#### **Application to Proceed in Absence**

132. Neither the Registrant nor his representatives attended the hearing and Ms Upadhyay applied to continue the hearing in the absence of the Registrant. She referred the Panel to recent email correspondence between UKCP, the Registrant and his solicitors [REDACTED]. [REDACTED] He states he cannot and will not engage further with the UKCP or the hearing. The Registrant asserts that [REDACTED] and goes on to say that he is not requesting a postponement but wishes the hearing to conclude as planned. The Registrant's solicitors confirm that there are no further submissions to be made or documents to be lodged on behalf of the Registrant.
133. Ms Upadhyay acknowledged the Registrant's [REDACTED] but observed that he had in fact chosen not to attend. He did not require an adjournment rather he wished the hearing to proceed and there was no evidence to suggest he would engage further if the case were to be adjourned. Ms



Upadhyay said that the Registrant was aware of the hearing, he had had the opportunity to provide written submissions and/or to instruct Counsel to speak on his behalf. He had not done so and it was clear that nothing further would be forthcoming.

#### **Decision re Proceeding in Absence**

134. The Panel accepted the advice of the Legal Assessor which included consideration of the overarching objective and the fact this is only met through a fair and timely hearing; that it had a discretion to proceed in the absence of the Registrant but this should be exercised with care and caution and, it would rarely if ever be appropriate to proceed if the absence was caused by ill-health.

135. The Panel determined that the case should continue in the absence of the Registrant.

136. In coming to the above decision the Panel acknowledged that the Registrant [REDACTED] but observed that this is a natural process and not an illness. There was no evidence before the Panel to suggest the Registrant is currently prevented from attending or participating through illness. The Panel noted that [REDACTED] he had in the meantime provided a cogent letter setting out his views. He had the opportunity to instruct his solicitors and/or Counsel to attend and provide documentation or make submissions but he had declined and said he would not engage further. The Panel determined that there was no evidence that the Registrant would engage after a period of time and that adjourning would simply delay the conclusion of the case.

137. The Panel considered that the Registrant had voluntarily absented himself from the remainder of the hearing and had decided not to provide further information or make further comment. Nonetheless the Panel was satisfied it could and would ensure that the proceedings remained fair. It would take account of the evidence and comments provided to date by the Registrant and his representatives and it would not draw any adverse inference from his non-attendance.

#### **Determination of Misconduct**

138. In accordance with rule 7.23 of UKCP's Complaints and Conduct Process, the Panel went on to consider the question of misconduct. In addressing this question, the Panel took account of the relevant information before it including further submissions from Ms Upadhyay on behalf of UKCP and the information, evidence and submissions previously provided by the Registrant and his representatives.

139. Ms Upadhyay invited the Panel to conclude that the facts found proved constitute misconduct. She referred to the case of *Roylance v GMC [2000]* and submitted that misconduct is a serious falling short of the rules and standards expected of a professional. She reminded the Panel

that it had found the Registrant breached professional boundaries and acted inappropriately and unprofessionally with both Client A and Client B. The Registrant had been described as acting in a narcissistic manner and he had breached Client A's confidentiality. She said that there were multiple breaches of the Code of Ethics and said that the Registrant's conduct fell significantly short of the standards expected from him.

140. Concerning current impairment, Ms Upadhyay referred the Panel to the questions set out in the case of **CHRE v NMC and Grant [2011]**. She said that three of the four questions were engaged and could be answered in the affirmative. These included that the Registrant had in the past put clients at risk of unwarranted harm; he had in the past brought the profession into disrepute; he had in the past breached a fundamental tenet of the profession. She said the fourth question regarding dishonesty was not relevant. Commenting upon the future risk and whether the Registrant may in future cause harm, bring the profession into disrepute or breach a tenet of the profession, Ms Upadhyay said that again all three were engaged. She said there was little evidence regarding the Registrant's consideration of his failings or his intentions for the future. Whilst he had expressed regret and acknowledged and 'owned' his failings he also said that his actions may be misrepresented and he felt persecuted. In addition while she suggested he might retire there was no clarity as to when or whether this was going to happen.

141. Ms Upadhyay submitted that the Panel should take account of the Registrant's admissions, his witness statements and his oral evidence and the fact that he had accepted some wrongdoing and some lack of professionalism. She suggested that he had some insight into his misconduct but it was insufficient to conclude it would not be repeated. Ms Upadhyay referred the Panel to the case of **Cohen v GMC [2008]** and the questions set out regarding whether the misconduct found proved was remediable, whether it had been remediated or whether there was a high risk of repetition. Again, Ms Upadhyay submitted that the Registrant demonstrated some insight, but it was not full insight. This, she said, was made clear in his most recent letter which included blame upon the UKCP and little if any consideration of the public interest in the process undertaken to date. There was also no evidence concerning his current position or future plans. She submitted that the Panel should take account of the documents provided by the referees and the positive comments therein. This included a number of certificates which predated the findings of the Panel. Ms Upadhyay thus cautioned the Panel on the basis that the references and certificates predated the findings of fact and none had been updated since those findings had been made.

142. In conclusion, Ms Upadhyay said that the allegations were serious and questions to be answered included what level of insight the Registrant had shown, what level of apology or remorse, what level of understanding concerning the impact upon clients, what level of understanding concerning the impact upon the reputation of the profession and its regulator. She said there was not much if any evidence of steps undertaken to address the risks identified in the findings of the Panel.

## Determination of Misconduct

143. The Panel accepted the advice of the Legal Assessor as to the approach it should adopt in considering the question of misconduct. The Panel recognised that the question of misconduct is a matter of independent judgement and is not a matter of proof for the parties.

144. In addressing whether the facts proved amounted to misconduct, the Panel had regards to the comment by Lord Clyde in the case of **Roylance v GMC** (above) that:

*“Misconduct is a word of general effect, involving some act or omission which falls short of what would be proper in the circumstances. The standard of propriety may often be found by reference to the rules and standards ordinarily required by...a practitioner in the particular circumstances.”*

145. The Panel had regard to the judgement of Collins J in the case of Nandi v GMC [2004] in which he said: *“The adjective “Serious” must be given its proper weight, and in other contexts, there has been reference to conduct which would be regarded as deplorable by fellow practitioners. It is, of course, possible for negligent conduct to amount to serious professional misconduct but the negligence must be to a high degree.”*

146. The Panel determined that the facts admitted and those found proved did give rise to a finding of misconduct.

147. In coming to the above conclusion, the Panel took account of its findings that the Registrant’s failings did not involve a single or a short-term event but occurred over a lengthy period of time. It involved two clients and there were 18 breaches of the Code of Conduct. The Panel was of the view that a dominant concern was the Registrant’s failure to impose and uphold boundaries when dealing with vulnerable clients. Indeed it was evident to the Panel that there were few clear boundaries between the Registrant and Clients A and B. In addition, the Registrant did not focus his attention upon those areas Client B wish to explore with him. Instead he undertook a wide-ranging probe into her life reactivating previous trauma. This was inappropriate. He should have remained focused upon the issue she wanted therapy for, i.e. improving her confidence in public meetings, rather than engage in a process of self-directed experimentation. The harm he caused outweighed any help given to either client and the Panel was of the view that the public would find this serious, unacceptable and deplorable.

## Determination of Impairment

148. The Panel next considered the question of impairment. Again, it took account of Ms Upadhyay’s submission and the material provided by/on behalf of the Registrant. It accepted the

advice of the Legal Assessor and understood that it should consider the Registrant and his practice now and in the future.

149. The Panel determined that the Registrant's fitness to practice is currently impaired.

150. In reaching its decision, the Panel was mindful that the question of impairment is a matter for the Panel's professional judgement. The Panel was required to determine whether the Registrant's fitness to practise is currently impaired. The Panel had to assess the current position looking forward not back, however in order to form a view of the Registrant's fitness to practise today, the Panel will have to take account of the way in which the Registrant has acted or failed to act in the past. The Panel acknowledged that a finding of misconduct does not necessarily mean that there is impairment of fitness to practise. There must always be situations in which a Panel can properly decide that the act of misconduct was, on the part of the Registrant, isolated and the chance of it being repeated in the future is so remote that his or her fitness to practise has not been impaired.

151. In determining the question of impairment the Panel adopted the approach set out in the case of **CHRE v Grant [2011]** and the four questions approved in that case.  
*"Do our findings of fact in respect of the [Registrant's] misconduct. . . show that his fitness to practise is impaired in the sense that he:*  
*a. Has in the past acted and/or is liable in the future to act so as to put a patient or clients at unwarranted risk of harm; and/or*  
*b. Has in the past brought and/or is liable in the future to bring the . . . 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 . . . profession; and/or*  
*d. Has in the past acted dishonestly and/or is liable to act dishonestly in the future.*

152. The Panel was also mindful that when considering impairment, it is entitled to have regard to the wider public interest in the form of maintaining public confidence in the profession and declaring and upholding proper standards. The Panel had regard to the following part of the judgement in the case of **Grant**:  
*"In determining whether a practitioner's fitness to practice is impaired by reason of misconduct, the Panel should generally consider not only whether the practitioner constitutes a present 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."*

153. The Panel first affirmed that question 'd' regarding dishonesty was not relevant to this case.

154. In considering each of the questions a, b and c in the past tense, the Panel determined that each was to be answered in the affirmative. Harm had been caused to two clients; the misconduct was so serious as to bring the profession into disrepute and in failing to maintain professional boundaries and harming clients the Registrant had breached one or more fundamental tenets of the profession.
155. The Panel next considered whether the Registrant was liable to act in such a way in the future. The Panel had regard to any level of insight shown by the Registrant. The Panel also had regard to the decision in the case of **Cohen v GMC [above]** and considered whether the Registrant's misconduct is easily remedied; has already been remedied; and whether it is likely to be repeated.
156. The Panel acknowledged that the Registrant admitted several of the allegations against him and expressed regret, remorse and shame regarding them. However, it was not clear that he felt the same regarding the matters he denied but which were found proved. In his letter to the UKCP, 'R4' received on 27 November, the Registrant expressed concern at the Panel's description of him and the facts found proved. He expressed deep regret 'on the points [he had] acknowledged and the impact this had on the complainants.' He said that his regrets were expressed in his earlier submissions. He did not express similar regret regarding the matters proved against him.
157. The Panel considered that there was little if any evidence from which to conclude that the Registrant acknowledged the Panel's findings or the basis for them. Indeed, his letter implied a rejection of the criticism levelled at him. Similarly, whilst the Panel had received CPD certificates from the Registrant, it had received no evidence from which to conclude the Registrant had addressed these shortcomings by way of professional development or training. Whilst the Panel acknowledged that the Registrant had undertaken personal therapy and said he would undertake monthly supervision in the future, there was no evidence as to what this amounted to. In addition, whilst there were references attesting to the Registrant's good character, none had been updated since the conclusion of the fact-finding stage. One or more references spoke of the Registrant's capacity to change but, the Panel had no evidence to confirm this or confirm that the Registrant had started this process. His letter suggested he did not retain a capacity to change and/or that he had not started that process to date nor would he do so in future.
158. The Panel concluded that the Registrant had some limited insight into the failings that he acknowledged but little if any into those matters proved against him and/or the criticisms evident in the findings of fact which include that he harmed clients. He appears to reject that criticism. Furthermore, despite the references and the Registrant's previous evidence, the Panel considered that it had before it no evidence of remediation or an intention to remediate. The Panel concluded that with limited insight and without evidence of remediation the risk of repetition remained high and as such the Registrant's fitness to practice is currently impaired.

159. Finally, the Panel considered the public interest, the necessity to declare and uphold professional standards and maintain public confidence in the profession.

160. The Panel determined that with all relevant questions from the case of **Grant** answered in the affirmative and for all the reasons set out above, the public interest also necessitates a finding that the Registrant's fitness to practice is currently impaired.

### **Determination on Sanction**

#### **Submissions on Sanction**

161. The Panel received further oral submissions from Ms Upadhyay. The Registrant was not present in this part of the hearing having absented himself as set out above. The Panel nonetheless took his statement and documents into account in determining which sanction was appropriate in the circumstances of this case.

162. Ms Upadhyay reminded the Panel that the purpose of sanctions is to protect the public, uphold professional standards and maintain public confidence in the profession. She said that they were not intended to punish but that they may have a punitive effect and the Panel should keep the issue of proportionality in mind. That being the case the Panel should consider the sanctions in ascending order. She submitted that proportionality was central to the decision. Nonetheless, Ms Upadhyay submitted that the appropriate sanction was to remove the Registrant from the register. She said this was due to the overall seriousness of the case and that no lesser sanction would protect the public or address the public interest. Regarding the lesser sanctions, Ms Upadhyay submitted that many of these required the Registrant's engagement and she questioned whether he would engage with them. She submitted that the Registrant's current circumstances may have reduced his ability to engage and to remediate but queried whether there was in fact any evidence from which to conclude the Registrant could or would be willing to engage and remediate in the future.

163. Ms Upadhyay suggested that there were the following aggravating features in the case; multiple breaches of the Code, breaches of confidentiality. She said that there was no evidence the Registrant would engage now or in the near future and as such the lesser sanctions, which required his engagement, were unworkable. In any event they did not meet the seriousness of the case. As to mitigating factors Ms Upadhyay pointed to the Registrant's lengthy career with no previous complaint, the testimonials and his engagement with the process overall. She noted that the Registrant had engaged in personal therapy and supervision but said there was no evidence regarding these. She suggested the Registrant may be developing some insight having made some admissions before and during the fact-finding hearing. She submitted that his insight and his remorse was limited.

## Decision on Sanction

164. The Panel determined that the appropriate sanction is Removal of the Registrant from the register.
165. In reaching its decision, the Panel had regard to the UKCP's Indicative Sanctions Guidance 2019 ("the ISG") but exercised its own independent judgement.
166. The Panel accepted the advice of the Legal Assessor. The Panel recognised that the purpose of any sanction is not to punish the Registrant, although that may be the consequence of a carefully weighted decision. The Panel recognised that any sanction must be proportionate and weigh the public interest with that of the Registrant.
167. The public interest includes the protection of members of the public, including Clients; the maintenance of public confidence in the profession; and the declaring and upholding of proper standards of conduct and behaviour within the profession.
168. The Panel reminded itself of the Registrant's earlier statements and took account of his evidence, his previous good character and the testimonials he provided.
169. The Panel considered the sanctions available to it under rule 7.25 of the Complaints and Conduct Process in ascending order and was mindful that any sanction imposed should be the minimum that would be considered necessary and proportionate in the circumstances.
170. The Panel has set out the nature of the misconduct found proved including the boundaries that were breached, the harm caused, the period of time over which this occurred and whether there is a likelihood of repetition. The Panel considered whether there were any particular aggravating or mitigating factors in the case. These are for the most part addressed in the consideration of the individual sanctions and by the fact that the Panel has already found the misconduct to be serious. However in short, concerning aggravating factors, the Registrant engaged in a lengthy course of misconduct which breached many areas of the Code, caused harm to clients and broke their right to confidentiality. Regarding mitigating factors, the Panel recognised that the Registrant has a long and unblemished career and others speak highly of him. He admitted several of the allegations and expressed remorse concerning these. He made further concessions during his evidence. However, his recent correspondence did not indicate a similar acknowledgement of harm or expression of regret or remorse.
171. The Panel concluded that the Registrant has some insight into his failings, but he has provided no evidence of remediation to date or the capacity to remediate in the future. Whilst the Panel acknowledged that the Registrant was currently experiencing very difficult personal circumstances

these were not such as to prevent him from indicating his acceptance of the findings and/or what he could do to address them. Instead, he appeared to reject the Panel's adverse findings.

172. The Panel recognised that whilst regulatory proceedings may have had an adverse impact upon registrants, the public interest outweighs private interests when considering the sanction that is appropriate and necessary to protect the public and meet the overarching objective of public protection.

173. Having reviewed the competing factors set out above, the Panel went on to consider the appropriate sanction(s) in order of seriousness. It kept the issues of public protection and proportionality at the forefront of its consideration.

a. Apology

The Panel considered that neither a written nor a verbal apology reflected the seriousness of the case nor would it be sufficient to protect the public. Whilst the Registrant had provided a limited apology this was to be viewed in all the circumstances of the case which included his limited insight and the minimisation of his misconduct. He had made a limited apology to Client A but had not apologised to Client B. The Panel has already determined that there is a risk of repetition and that an apology would do nothing to address this or address the public interest.

b. Warning

The Panel adopts its above reasoning. It concluded that a written warning would not be sufficient to protect the public or public confidence in the profession. It would not meet the seriousness of the case and there was no evidence from which to conclude the Registrant would accept and/or learn from such a warning.

c. Written report or oral statement

The Panel adopts the above reasoning. A report or statement would not meet the seriousness of the case nor be sufficient to protect the public. There was insufficient evidence that the Registrant had accepted and/or reflected upon his wrongdoing. There was no evidence the Registrant would engage with the provision of such a report or statement.

d. Further training

The Panel adopts the above reasoning. Furthermore, it had seen no evidence of learning since the findings of fact which addressed the risks identified by the Panel. The Registrant repeatedly said that he tried to provide a good service to his clients but he said that he 'over-cared' for them. There was no evidence of training to meet this or indeed to suggest that training could meet this. Furthermore, there was no evidence from which to conclude the Registrant would engage in what was necessary to meet the risks identified by the Panel which went beyond what he admitted.

e. Further supervision or therapy

The Panel adopts the above reasoning. It determined that supervision and therapy do not meet the seriousness of the case and would not protect the public. It noted that such supervision as the



Registrant undertook during his prolonged course of misconduct was insufficient to protect the public. There was no evidence from which to conclude that further supervision or any form of therapy would do so and no detail of such support had been proffered for the Panel's consideration. There was no evidence from which to conclude the Registrant would engage in appropriate supervision or therapy.

f. Conditions of Practice Order

The Panel next considered whether the impairment could be addressed by placing conditions on the Registrant's practice. It determined that it could not. A Conditions of Practice Order did not address the seriousness of this Panel's findings. No conditions were suggested, and the Panel was of the view that none could be devised without the Registrant's engagement. He had withdrawn from the hearing and indicated he did not wish to engage with UKCP in the future. He had demonstrated limited insight into his failings and there was no evidence from which the Panel could be satisfied that the Registrant could or would remediate his failings.

g. Suspension Order

The Panel recognised that suspending the Registrant may protect the public in the short-term but it considered it would not do so in the long-term. The Panel was also of the view that suspension was not sufficient to maintain public confidence in the profession. The Registrant had engaged in a lengthy course of conduct involving many breaches of the Code. He maintained that he only intended to care for his clients but may have 'over-cared' for them. In fact, he caused harm to Client A and Client B and to the reputation of the profession. He had demonstrated limited insight into this to date and there was no evidence from which to conclude that a period of suspension would engender such insight. He had not remediated or started to remediate and there was no evidence to conclude he would remediate in the foreseeable future.

h. Removal from UKCP Register

Finally, the Panel considered removing the Registrant from the UKCP register. It adopted all its above reasoning and concluded that Removal was the only sanction proportionate to the seriousness of the case and such as would protect the public and public confidence in the profession. The Registrant had engaged in a prolonged course of misconduct and had limited insight into his impairment. He demonstrated limited awareness of the harm he had caused to Client A and Client B or to the profession as a whole. There was little evidence of reflection, learning, insight or consideration of how he may change to protect the public and the reputation of the profession. The Panel saw insufficient evidence to suggest that he was capable of such consideration or change. It therefore concluded that there remained a serious risk to the public and to the reputation of the profession. As such Removal was the only sanction that would protect the public and the profession. The Panel was satisfied that no other sanction would mark the seriousness of the case or maintain public confidence in the profession or its regulator.

### **Application for an interim suspension order**

174. Ms Upadhyay submitted that an Interim Suspension Order (ISO) was necessary to cover the 28-day appeal period and the time taken for any appeal to be determined should one be lodged. She said that the existing ISO should be extended to meet this need.

175. The Panel accepted the advice of the Legal Assessor.

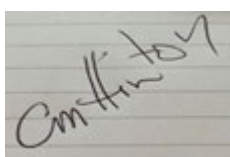
176. The Panel considered that an ISO in the terms sought by Ms Upadhyay was necessary to protect the public and was in the public interest. In addition, not imposing an order would be inconsistent with the Panel's finding of an ongoing risk to the public and to the reputation of the profession. The Panel thus determined to extend the existing order to cover the 28-day appeal period and the time taken for any appeal to be determined should one be lodged.

### **Right of Appeal**

177. Both the Registrant and UKCP have 28 days from when the written decision is served in which to exercise their right of appeal.

178. The sanction outlined above will not take effect until after the 28-day period has lapsed. If no appeal is received the decision will take effect after the 28<sup>th</sup> day.

Signed,

A handwritten signature in dark ink on a light-colored background. The signature appears to be 'Catherine Hinton' written in a cursive, slightly slanted style.

Catherine Hinton, Lay Chair

1 December 2025