



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

**8 – 11 July
ONLINE**

Name of Registrant:	Claire Maskery, HIPC
Heard by:	Adjudication Panel
Panel Members:	Catherine Hinton (Chair) Hilary Brown (HIPC) Stephen Coulter (CFCST)
Legal Assessor:	Jon Whitfield, KC Doughty Street Chambers
Panel Secretary:	Bethany Rees
UKCP Presenting Officer:	Sophie Walmsley, Guildhall Chambers
Registrant's Representative:	Not Present but represented (also not present)
Charges found proved:	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 12, 13, 14
Charges found not proved:	11
Panel decision:	Misconduct found proved. The Registrant's fitness to practice is currently impairment.
Sanction:	The Registrant shall be removed from the UKCP register

Detail of allegations

That being a UKCP-registered psychotherapist since at least 2017, you Claire Maskery (the Registrant):

1. Between at least November 2018 and March 2024, you advertised your status as a registered psychotherapist to support your professional mummy business.

Denied

2. Between November 2020 and February 2024, you did not manage the boundaries of your relationship with Client A in that you, at times, encouraged Client A to open up to you about her mental health and to see you as her psychotherapist.

Denied

3. Between November 2020 and February 2024, you engaged in both a professional mummy and psychotherapeutic relationship with Client A.

Denied

4. Between November 2020 and February 2024, you:

- a. Engaged in a personal relationship with Client A;

Denied

- b. Sent hundreds of Twitter messages to Client A outside of scheduled sessions, including messages of a personal nature (Appendix A);

Denied

- c. Offered longer sessions to Client A at no extra cost;

Denied

- d. Called Client A pet names, such as “sweetness” and “my love”;

Denied

- e. Told Client A you loved her and had the “warm fuzzies” for her;

Denied

- f. Discussed your own personal issues with Client A.

Denied

5. Between 28 January and 30 January 2023, you saw Client A for an in-person professional mummy visit. During this visit, you kissed Client A’s head, stroked her hair and cuddled her.

Denied

6. On 29 January and 30 January 2023, you removed Client A’s clothes, rubbed ~~baby lotion~~ Sudocrem onto her buttocks and put a nappy on her.

Denied

7. On 30 January 2023, you spoon-fed Client A.

Denied

8. On 30 January 2023, you removed Client A's nappy. You then used wipes on her.

Denied

9. Your actions at paragraphs 6 – 8 above occurred without Client A's consent.

Denied

10. Between 12 August and 14 August 2023, you saw Client A for an in-person professional mummy visit. During this visit, you kissed Client A's head, cuddled her and went for public outings together.

Denied

~~11. On 10 November 2023, you sent Client A a friend request on FetLife. You were aware that this was Client A's account.~~

~~**Denied – Withdrawn following the oral evidence**~~

12. On 28 February 2024, you ended your relationship with Client A via Twitter.

Denied

13. Your actions at paragraphs 1 – 12 above were:

a. Inappropriate; and/or

Denied

b. Unprofessional.

Denied

14. The behaviours set out at paragraphs 1 – 13 above are in breach of UKCP Code of Ethics and Professional Practice 2019 ("the Code"). In particular, you:

a. Failed to act in Client A's best interests, thereby breaching clause 1 of the Code.

Denied

b. Failed to treat Client A with respect, thereby breaching clause 2 of the Code.

Denied

c. Failed to respect Client A's autonomy, thereby breaching clause 3 of the Code.

Denied

d. Abused and/or exploited your relationship with Client A for any purpose including your emotional gain, thereby breaching clause 5 of the Code.

Denied

e. Harmed Client A, thereby breaching clause 6 of the Code.

Denied

f. Engaged in a dual relationship with Client A, thereby breaching clause 8 of the Code.

Denied

- g. Failed to make considered and timely arrangements for the termination of the therapeutic relationship with Client A, thereby breaching clause 27 of the Code.

Denied

- h. Failed to ensure that any communication in which you took part was carried out in a manner consistent with this Code, thereby breaching clause 34 of the Code.

Denied

- i. 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.

Denied

- j. Failed to report potential breaches of the Code to UKCP, thereby breaching clause 37 of the Code.

Denied

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

Documents

The Panel had placed before it the following documents:

- A principal bundle on behalf of UKCP amounting to 846 pages, hereafter referred to as C1;
- Allegations on behalf of UKCP, amounting to 491 pages, hereafter referred to as C2;
- 34 Audio Recordings referred to in C1;
- A principal bundle on behalf of the Registrant amounting to 18 pages, hereafter referred to as (R1).
- A witness statement on behalf of the Registrant, amounting to 25 pages, hereafter referred to as (R2).
- Submissions on Facts on behalf of the Registrant, amounting to 9 pages, hereafter referred to as (R3).

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. Proceeding in the absence of the Registrant
 - b. The admission of the Registrant's bundles
 - c. Proceeding in private session for Client A's evidence
 - d. The Registrant's purported admissions.

3. Proceeding in Absence

(i) Submissions

Ms Walmsley applied to proceed in the absence of the Registrant. She submitted that the Registrant had been notified of the hearing, had responded with a full statement and that her submissions had been provided by lawyers acting on her behalf. Ms Walmsley submitted that the public interest was met by a timely disposal of serious allegations such as these and the Registrant had chosen not to attend.

(ii) Decision on proceeding in absence

The Panel determined that the proceedings should continue in the absence of the Registrant

(iii) Reasons

- (a) In coming to the above decision the Panel accepted the advice of the legal assessor that it had a discretion to proceed in the absence of the Registrant but that this should be exercised with caution balancing the public interest against the Registrant's right to attend.
- (b) The Panel noted that the Registrant has provided a full statement with exhibits, supporting references and that submissions had been lodged on her behalf. In addition neither the Registrant nor those acting on her behalf sought an adjournment of proceedings that are already more than a year old.
- (c) The Panel determined that the Registrant had engaged to the extent that she wished in the provision of documentation and submissions but had thereafter voluntarily absented herself. It was of the view that adjourning would not result in the Registrant's attendance. The Panel was of the view that it could hold a fair hearing to examine the allegations in the absence of the Registrant and that no adverse inferences would be drawn from her non-attendance.

4. Admission of Defence Documents

(i) Submissions

Ms Walmsley stated that the UKCP did not object to the admissibility of the Registrant's bundles nor to the submissions made on her behalf but, the fact that there was no opportunity to test the evidence and the fact that the submissions were made before all the evidence was complete meant the Panel should carefully assess the weight to be applied to each. She submitted that such weight should be "minimal".

(ii) Decision on Registrant's Documents

The Panel determined that the Registrant's bundles as detailed above, should be admitted into evidence.

(iii) Reasons

- (a) The Panel accepted the advice of the legal assessor that the statements, exhibits and references were admissible. The weight to be applied to Registrant's documents and submissions was a matter for the Panel to determine having heard all the evidence in the case.

- (b) The Panel determined that the Registrant's bundles should be admitted in order for her voice to be heard and for her side of events to be considered. It recognised that in her absence the contents of the statements and documents could not be challenged but, it accepted Ms Walmsley's submission and the advice of the legal assessor, that this should be considered in relation to weight rather than admissibility.
- (c) The Panel further determined that the weight to be applied to the Registrant's evidence and/or submissions was a matter for it to consider at the close of all the evidence following further submissions on behalf of the UKCP and the Registrant and any advice by the legal assessor.

5. Proceeding in private

(i) Submissions

Ms Walmsley invited the Panel to hear Client A's evidence in private. She submitted that although Client A's details were anonymised the case concerned details of her private life including her physical and mental health. She submitted that Client A's private interests outweighed the public interest of an open hearing and, despite the anonymisation of the documentation, there remained a potential risk of Client A being identified.

(ii) Decision on hearing evidence in private

The Panel determined that Client A's evidence should be heard in private.

(iii) Reasons

- (a) In coming to the above decision the Panel accepted the advice of the legal assessor. It recognised that although regulatory proceedings are usually held in public, where matters of a private nature such as health and welfare are to be considered, these may outweigh the public interest.
- (b) The Panel noted that the case involves the consideration of very personal matters that should be considered in private to protect her interests. In addition the Panel noted that Client A is vulnerable. If Client A were to be identified there is a risk of substantial harm. The Panel determined that Client A's private interest outweighed the public interest.
- (c) In terms of the public interest, the Panel noted that this is still protected by the fact that the UKCP is entitled to publish the result of hearings where there are findings adverse to a Registrant, and that as a professional regulatory body it may provide guidance to practitioners based upon the cases that come before it. This decision does not fetter the UKCP in how it provides such guidance.

6. The Registrant's purported admissions

(i) Submissions

- (a) Ms Walmsley submitted that although the Registrant admitted some of the alleged conduct she placed a caveat on her admissions stating that the conduct only occurred whilst she acted in her role as a 'professional mummy' and not as a regulated

psychotherapist. As such, Ms Walmsley invited the Panel to treat such purported admissions as denials.

- (b) Ms Walmsley submitted that the UKCP regulates psychotherapists not 'professional mummies' and a central issue to the case was whether and, if so how, the boundaries between them were blurred. She continued that it was the UKCP's case that the Registrant's conduct was such as to use the guise of a 'professional mummy' to in fact provide services akin to psychotherapy. The case was thus about blurring of boundaries.

(ii) Decision

The Panel determined that it would only accepted clear unequivocal admissions made without caveat. Anything else would be treated as a denial.

(iii) Reasons

- (a) The Panel accepted the advice of the legal assessor. It recognised that for an admission to be relied upon it should be freely made and without caveat or contradiction.
- (b) The Panel recognised that these proceedings concerned regulation of the Registrant as a psychotherapist not as a 'professional mummy'. As such the Registrant's admitted acts in her role as a 'professional mummy' were not the issue since they were not an admission by her in her regulated role as a psychotherapist.
- (c) The Panel was of the view that it was required to determine whether the conduct alleged occurred when the Registrant was, through a failure to maintain boundaries, at times in fact acting as a psychotherapist, despite her assertion that she was acting in her alternative unregulated role. The Panel considered this firmly disputed issue as central to the case between the UKCP and the Registrant.

Summary of the allegations

7. In summary, the UKCP allege that whilst practising as a registered psychotherapist the Registrant undertook a role for paying clients which she described as being a 'professional mummy'. She did this using the name "Mummy Grace". This is not a registered profession nor does the role appear to be defined or delineated in any reliable/professional way. The role includes the Registrant acting out the role of a mother-figure for her clients as she seeks to meet what is described as their "adult-baby needs" or their "little" side. After initial on-line contact the relationship between the Registrant and a client may progress to contact in person. In the case of Client A, there was frequent communication on social media by Twitter direct messaging and by email. In these and in online sessions the Registrant used terms of endearment and familial terms (sweetness, my love) and discussed and advised on personal issues. Subsequent in-person contact between Client A and the Registrant included social walking together, sitting cuddled together on a sofa watching television, physical (non-sexual) contact akin to a parent comforting a child/baby (cuddling, petting, stroking, platonic kisses, using a dummy, spoon-feeding) and more physically intimate contact such as undressing Client A, applying Sudocrem to her buttocks and dressing her in nappies. The UKCP alleged that Client A did not consent to such actions.

8. The UKCP alleged that the Registrant did not properly manage the boundaries between her work as a regulated psychotherapist and her role as a professional mummy. Rather she deployed and emphasised her experience as a psychotherapist to obtain clients and again when acting in her role of professional mummy to Client A such that this became indistinguishable from her work as a psychotherapist. Whilst it may be that the relationship between the Registrant and Client A commenced with the Registrant acting in the role of professional mummy, she quickly adopted the position of therapist to Client A and indeed Client A regarded her as such. Whilst acting as a therapist the Registrant continued to engage in the behaviour outlined above and set out in the Allegations. Such behaviour is not expected of a registered professional working in that capacity
9. The Registrant accepted that much of the alleged behaviour occurred however she asserted that this was only when she acted as a professional mummy. She said that Client A consented to all such behaviour. It was the Registrant's case that she did not advertise her position as a psychotherapist to support her professional mummy business and the two roles were entirely separate. Furthermore, she said she maintained that separation of roles and never worked as a psychotherapist for Client A. As such she said any conduct undertaken in her professional mummy role was not subject to regulation by UKCP nor was she in breach of the UKCP Code of Conduct.

Summary of Evidence

Evidence for the UKCP

10. Client A was called to give evidence. She adopted her statement and exhibits as true to the best of her knowledge and belief. These formed the basis of the Allegations listed above. Ms Walmsley then asked a number of supplementary questions.
11. Ms Walmsley first took Client A to documents in bundle C2 which Client A described as a website form filled out by people to apply to meet the Registrant who she called "Mummy Grace". She explained that she filled out the first form in 2018. She also said that she and the Registrant communicated through the Registrant's preferred medium of Twitter direct messages. Client A explained that she first came to know of the Registrant through an online forum and from someone who had seen her in her capacity as professional mummy. That person shared their "little side" and inner needs with the Registrant and she became their mummy. Client A explained that she was attracted to someone who would not judge her for needing to be nurtured. She explained that she was otherwise happy in her adult experience. Having been made aware of the Registrant Client A said that she reached out to her because in 2018 she had been approved for assisted suicide in Switzerland and she was advised to try anything before going down this route. She therefore filled in the forms and reached out to the Registrant.

12. When asked why she reached out to the Registrant in particular, Client A said that there are not many people who advertise what she offers. She said the Registrant offered a lot of services that she did not want, rather she needed someone who could provide unconditional love, understanding and would engage in playing games when the world felt scary. She said that other people who offer this sort of service do so as a hybrid sexual service and generally act for men. She did not want this. She said the Registrant offered psychotherapy and she wanted to know more about that and the boundaries involved before opening herself up and being vulnerable to someone. Client A said that she viewed the Registrant's therapy website and her shorter UKCP web listing.
13. Client A described various parts of the online form and said in email correspondence they discussed the expected impact of a visit. She said that the form asked her to present her "little needs" as a separate identity which is how it was conceptualised by the Registrant. However, Client A said she is not fragmented like this and she said, "it's all me". Client A said that she tried to think of characteristics and her younger developmental identification when filling in the form but these did not amount to a request to do these things to her. She said that other of the Registrant's clients had spoken of being held or embraced. When asked if there was any online conversation regarding physical touch Client A said that the Registrant would sometimes say she wanted to wrap her in cotton wool and hold her but there was nothing explicitly babyish. There was no reference to briefs or nappies in the messaging and this was not part of her personal world.
14. Client A said that she filled out a second form in 2020 because she had a job and she reached out to meet the Registrant remotely. She explained that she had cancelled the 2018 trip to which the earlier form referred but between 2018 and 2020 they remained in contact interacting through Twitter posts. This included at least one coded message sent publicly but intended for Client A alone. Client A said that the Registrant later confirmed this was specifically for her. Client has said that the nature of contact was weighted in different ways, she would share her difficulties and the Registrant would share more playful and fun things that brought a smile to the Registrant's face when she acted as a comforting figure. Client A said that the Registrant was aware that she was approaching her date to go to Switzerland (for assisted suicide) and knew that she (Client A) was ambivalent about this.
15. Regarding the box in the second form which mentions physical touch, Client A explained that she put "N/A" in the box since at the time they were only meeting online. She said she had no other support at the time and had recently ended a previous therapeutic relationship albeit she had done so positively. Client A was asked about her expectations when she reached out to the Registrant in 2020. She said that she had grown to trust the Registrant online and she wanted to meet someone in a structured connection to provide support as she was starting a new job. She did not want to role play, she wanted a 'non adult baby' relationship. She did not want the Registrant to act out one of her roles, such as a nurse, and she did not want to deep dive into herself, rather she simply wanted someone who cared a little bit.

16. When asked if there was any discussion about boundaries Client A said, “not a lot”. She described the Registrant saying that she (the Registrant) had a lot of difficulty in distinguishing between her therapist side and her ““Mummy Grace”” side. Client A said that she would follow the Registrant who should act as she (the Registrant) felt comfortable. She was asked if they discussed Client A’s wishes and she said that from memory she had said she was seeking someone with whom she felt safe and it would be like a friendly check in. However, she said that this evolved quickly as the Registrant talked of her clinical background and work with other clients. This quick expansion of the role occurred within the first couple of months. Client A said that the Registrant collected information about her family, her history, her development and her suicidal thoughts as if it was a standard therapy intake interview. She said she was very wary at the outset as she did not want this, rather she wanted a safe support to help her back into work mode but she trusted the Registrant.
17. Client A said that there were many virtual sessions before the two in-person meetings in 2023. Client A said that the Registrant would mention her MA (master’s degree) in person centred psychotherapy and refer to work she done with other clients albeit without specifics. The Registrant said that another of her clients reminded her of Client A. She described the Registrant as saying that she could understand Client A from a clinical perspective and they could ameliorate things together. She said that the Registrant would say ‘she understood, she had permission from Client A, be brave express your feelings’. Client A described that she felt the Registrant had become indispensable to her. Client A described the Registrant as saying that ‘only she could save herself, she should be brave’ and said the Registrant would reference formulations about her that she withheld. She described the Registrant as referencing something that would make or break her and so Client A questioned herself regarding what they were doing and felt that the Registrant was saying Client A should trust her and she would lead them somewhere.
18. Client A said that initially the Registrant was fun and bouncy and there were nurturing elements and she just enjoyed spending time with her. After two months it felt more like the Registrant was a helper. After six months “I felt she was my therapist because she was saying the same things to other clients, using clinical terms and also the way she referred to me.” Client A said, “I came to think of her as my therapist.”
19. Ms Walmsley asked if there had been any discussions regarding Client A’s health and personal circumstances. She said that the Registrant had thoughts about her upbringing and critical environment which the Registrant would invoke and criticise at times. She said the Registrant spoke of criticism, Client A’s perfectionism, not wanting to go over time, her willingness or reluctance to trust the Registrant and her complex grief over the loss of her dog. Client A said that she was hesitant to bring all this up because she did not know if the Registrant wanted to hear about it but rather if the Registrant brought it up she would respond. This was particularly the case if the Registrant had ‘practicals’ which she described as a way of changing things in her life as opposed to exploratory exercises. Client A said that at one point she asked the Registrant whether she should see another

therapist because the Registrant seemed to have moved away from therapeutic work. The Registrant did not answer the question directly but said that 'next time we will talk about the loss of your dog' which Client A understood to be a return to therapeutic work. Client A described them meeting weekly or nearly every week and for the first 20 minutes the Registrant would talk about what was on her mind but after that she would bring more needy things to the discussion. Client A described the Registrant reading chapters from Winnie the Pooh and Client A remembered referencing other people's experiences with her.

20. Client A was asked about the website 'FetLife' and she said she believed this was for people with kinks or fetishes. She said the Registrant had stopped using Twitter and moved to FetLife to get more clients. She said that she did not know anything about this side of the Registrant, they had stuck to little fluffy animals, so she set up an online ID to see what it was all about. Client A said that she then followed the Registrant on FetLife and the Registrant followed her back. Thereafter she revealed to the Registrant that it was her behind the online ID. She said it was confusing because the Registrant had sent out a friend request and it was not clear to Client A whether the Registrant knew it was actually her, so in March she told the Registrant that she was behind the online ID but she did not know whether the Registrant remembered this. She could not recall if they had any further discussion about this.
21. Concerning the in-person visits in January and August 2023, Client A said that the two visits were quite different to each other. She said that the first visit lasted 3 days and they spent six or seven hours per day in each other's company at the Registrant's home. She described the Registrant as from the outset adopting a very different role to how she was when they met online. She said the Registrant spoke of herself in the third person, eg. 'mummy did this, silly mummy, sweetheart mummy get this' and so on. Client A said that she had never called the Registrant 'mummy'. She then described watching television together whilst the Registrant held her, playing with trains and toys and the Registrant holding her and placing a pacifier (dummy) in her mouth and giving her drinks in a bottle. She said that on the second and third day the Registrant put briefs (nappies) on her. Client A said this is not how she was [REDACTED] She then described the second visit with the two of them walking the dogs, long days together, playing games such as Uno and Domino's. She described her experience with the Registrant thus, "the intensity of how she is in person is intoxicating . . . she is there tailoring decisions to make you feel loved" and she described being kissed on her head.
22. Client A described the in person meetings as being very different to the remote sessions. In person, the Registrant was playing the role of her mum or a 'mummy' but Client A said she was not that to her when they were online. She said that even though when online the Registrant would use terms such as 'darling' or other infantilising language, when they met in person she was taken aback to find her acting as if she was her mother rather than talking about deep issues.

23. When asked if there was any discussion regarding the pacifier/dummy, Client A said this was mostly through the online form. She described use of the dummy by the Registrant as “ok” but also said she did not want things like that on her body. She said it had not been discussed before the Registrant used it but it was OK because she regarded the Registrant as being safe. Client A said that if she could use the dummy as a soother and the Registrant did not judge her then that felt good. Client A regarded use of the bottle in the same way and it felt good to be with someone that she felt fond of.
24. Client A was asked whether she consented to the Registrant’s use of briefs/diapers/nappies and being spoon-fed. She said it was mixed; there was no consent form and the fact there was no such thing was confirmed by other clients of the Registrant who she had spoken to. She said that she fought with herself for not saying no to the Registrant but she was happy to be with the Registrant and over time she adapted into a younger role. She said she did not have a ‘little side’ and said she had real troubles afterwards. Client A said that she found speaking up to be challenging.
25. Client A described this part of the visit as being like a mock nursery with the Registrant asking if she wanted to get changed and, because of her history with the Registrant and because the Registrant did things that were contrary to what was agreed, she said she froze said things like she needed to adjust. Ms Walmsley asked Client A if she gave any verbal or physical indication that she did not want these things to happen. She said that she did try to delay things but she did not know if the Registrant picked this up. She described the Registrant as saying, “mummy fix you up, mummy change you” and she neither moved nor said yes or no, nor did she consent, rather the Registrant just went ahead. She said they did not speak about this afterwards instead they spoke of the visit overall and the Registrant focused on the positives but shut down any discussion of the negatives.
26. Concerning the second visit Client A said that the Registrant did not undress her, so on some level the Registrant must have understood what Client A had communicated to her even if it was not something explicitly said. Client A said that after the first visit she felt panicked about not seeing the Registrant again and after the above mentioned conduct it was not mentioned again. Client A described the second visit with the Registrant as being more like a friend who is sharing information about herself. She said the Registrant had said she was scared of sharing stuff and sharing her work. She said the Registrant talked about dog walking and spoke of her boyfriend Simon and she felt the Registrant was trying to make it the best possible visit by not mentioning the undressing etc. Client A said that she was “mortified and embarrassed” when the Registrant put cream on her bottom and she said that she was not sure how she (Client A) messed it up. She said it was ‘Sudocrem’ A protective barrier cream. She emphasised that its use was not necessary and they had never talked about it ever. She described the Registrant using baby lotion elsewhere on her body but not on her erogenous zones.
27. Client A was asked whether the in person sessions included therapy type information and she said no. She described the Registrant driving and saying that they had a ‘good relationship it was not therapy but it was therapeutic, it was a relationship’. Client A said that she was not sure if it was still OK for

the two of them to meet. It was put to Client A that the Registrant's case was the meetings were not therapeutic and she was not her therapist. Client A said that she would have agreed with this early on but by 3rd of November 2022 she was completely shocked when the Registrant said this because she was "very much my therapist". Client A said that the Registrant shared clinical ideas, encouraged her to share her thoughts and ideations and, for example, reading Winnie the Pooh was a way to engender emotional regulation. She said, " the Registrant called herself my therapist" and described them as talking every two weeks during which the Registrant said that she was increasing Client A's 'window of tolerance' and how she related to other people. Client A denied having problems relating to others. Client A said this was exactly what the Registrant spoke of in her thesis [doctoral thesis]. She described the Registrant saying, 'if you can't practise with your therapist then what the heck but then said "I'm not your therapist"' which came as a total shock.

28. Concerning paying for the Registrant's services, Client A said that the remote sessions cost £60. She described the Registrant accidentally sending an e-mail from her therapy address but she did not interpret this as meaning the Registrant was her therapist. She described the Registrant as saying, 'do we go back to silly stories or therapy or do we stop?' Client A said she chose therapy and felt she should pay more because she paid more in the USA and offered this to the Registrant. She described the Registrant as saying it was tempting but it was not fair to pay more simply because Client A was in the USA. Client A emphasised that the Registrant's rejection of additional funding was because it was not fair and not on the basis that it was not therapy. She said that when the Registrant got her doctorate her fee went up to £90.
29. Client A was asked if the therapeutic elements in their relationship were brought up because she (Client A) wanted this. She said she challenged that because she was not leading the charge. She described the Registrant as saying she wanted to be everything for Client A, she would write things down such as 'don't sit on your worries, don't edit yourself, just rely on me'. She had explained to the Registrant that she had come out of therapy and was hesitant and said that she was not sure she wanted all this.
30. Ms Walmsley took Client A to other areas of the bundle including screenshots of the Registrant's website which Client A had highlighted. One such was on the Registrant's archive website and another was after the Registrant claimed to have removed references to herself as a psychotherapist. Client A said that she would not want or expect love from a therapist and such comments suggested to her that the Registrant was not sure what she was offering. Client A was asked about a reference "therapy lite" and she said she was looking for a structured connection with someone, not therapy but a paid relationship for someone to meet her and make her feel better, to see someone she should get to know and could trust.
31. At page 104 of the bundle there is a comment in an e-mail 'you have put into words my own therapeutic approach' and Client A explained this was said after the Registrant had said she could not

disentangle therapy from “Mummy Grace”. Client A explained that she felt the Registrant was saying she could not do therapy and Client A had tried to disentangle things for her and messaged her. She said at this stage she did not think the Registrant was offering therapy but that the relationship could be beneficial (i.e. therapeutic) and indeed it felt therapeutic.

32. Client A was taken to p379-380 in the bundle and to discussions that she had with the Registrant. She described planned session number 56 in January 2024 at which the Registrant said she should ‘not edit herself, do the deep stuff’ and challenged Client A with the expectation that this would serve goals. She described the Registrant saying ‘it was not about just doing the nice things but about having concrete goals’.
33. Client A then answered questions from the Panel. She was asked why she had complained, which she agreed was something serious and not to be taken lightly. She said she was left feeling distressed and confused and without any chance of closure or understanding where it had gone wrong. Client A said the ending was not satisfactory, it was a three month process and described the Registrant saying that she was not sure and was seeking supervision. Client A described asking the Registrant how she presented it to her supervisor and said she (Client A) had started to extract herself. On the 31st of December Client A said that she felt the relationship had become more harmful and she had not realised how attached she had become to the Registrant. She said that she then panicked because although she wanted to create other support for herself she was holding on to the Registrant. She described the Registrant saying it was her fault and her issues and she now recognised the pain and that they had blurred the boundaries. However Client A said she did not believe this anymore. Client A said that they had a final meeting in February 2024 when she wrote to the Registrant and then the Registrant sent the termination message. She said that the Registrant said she was willing to help, loved her and cared for her but despite Client A’s attempts to remain in contact the Registrant did not actually do anything.
34. Client A was asked whether the Registrant ever explained that their contact or relationship could be harmful. She said that the Registrant had said she did not want to hurt her and saw her as something fragile to be scooped up and fed hot chocolate. She said that from her own experience being in the field, harm was always possible but it was not discussed. She said that she had been left with high levels of distress and confusion and not just the feeling of abandonment.
35. Client A was asked about reference to a payment or repayment being a gift and she said that she believed this was after she had cancelled the 2018 trip. She believed that the Registrant was saying she was not just filling in the gaps and that she mattered. She described the Registrant as saying that Client A paid for time but the love was free. Client A said she had no issue about paying for time if someone offers professional services but by the end she did not know what she was paying for and she did not want to cross boundaries so she resisted this. She said that she offered to pay for the many direct messages they exchange but the Registrant had said this was time freely given.

36. Client A was asked whether they had a therapeutic relationship or a friendly relationship. She said that she felt the issue of paying was confusing since paying to be with someone was not a service. She described herself as trying to understand what the relationship was since at times there was no work happening. Client A was asked whether she was aware of the Registrant's critical comments regarding other therapists and her mother at the time that they were made. She responded that at the time she did not realise the dependency but having read the messages over the weekend she was now aware of the negative comments. She had not been aware of the isolating element at the time. She noted that the Registrant had a poor family relationship and felt that some of her comments were judgmental of Client A's family. It was put to Client A that she had challenged the Registrant about regulation and she described the Registrant's response as saying 'there are no edges to "professional mummy"'. She said that she did not know whether any of this was being done intentionally by the Registrant and she regretted that the Registrant was absent from the hearing (for her to explain this to her). She described herself as not feeling like mentioning things as the sessions were not going anywhere. She said that she felt it could have caused her to fall apart but she now knew that she was not imagining things.
37. Client A was asked about the issue of love or care and she said that you can't pay for someone to love you but the Registrant would inject these statements into the sessions. Concerning the use of the pacifier/dummy and other things not consented to Client A said she did not anticipate its use but that was not a barrier. She described the Registrant as testing out that experience on others and then testing it out on herself. She felt it was reasonable at the time since she had discussed the role of professional mummy with the Registrant and knew of the Registrant's interactions. She said it was not sufficiently upsetting to raise alarms. She described the Registrant talking of herself in the third person as being embarrassing. When asked if she consented to some of these actions she said there was no consent because there was no asking by the Registrant it simply happened. She said she understood the Registrant would apply her clinical knowledge in her role as professional mummy.
38. In re-examination about consent, Client A said that she did not anticipate the Registrant using the dummy in the way that she did. She said that she felt herself to be responsible because she had a mouth and could say no and could move away but by the time it was used they had been together for 12 hours and she did not have access to her same levels of capacity and it made it hard to say no. She said that she wished they had simply stuck to what had been agreed and discussed in the form, the messages, the online discussions and in her own headspace but this was not honoured by the Registrant.

Evidence for the Registrant

39. The Registrant did not attend the hearing rather she submitted a statement and supporting documentation as set out above. In short she denied any wrongdoing and asserted that any conduct

about which complaint was made and any consequent suggestion of misconduct occurred whilst she acted as a professional mummy and not as a registered psychotherapist.

Amending the charges

40. Ms Walmsley applied to amend Allegation 6 such that this included the name of the cream applied to Client A by the Registrant. In addition, following Client A's evidence she conceded that Allegation 11 could not be proved and therefore sought to withdraw this.

Decision on amending the charges

41. The Panel accepted the advice of the legal assessor. It understood that the amendments sought were within its discretion provided they caused no unfairness to the Registrant or to the public interest.
42. The Panel consented to the application. The amended Allegations appear in the body of this document.

Reasons

43. The Panel determined that no unfairness was occasioned to either party since the amendment to Allegation 6 was a technical one which did not in any way alter the substance of the accusation. Furthermore, the withdrawal of Allegation 11 was in accordance with the evidence given by Client A and permitting the UKCP to withdraw this was fair to all parties.

Submission on the facts

44. Ms Walmsley provided written submissions to the Panel which were also served upon the Registrant's representatives. She relied upon these and amplified them in short oral submissions. She reminded the Panel that the burden of proving the case remained upon the UKCP and that the standard of proof was the balance of probabilities. She submitted that there was evidence upon which to find all the allegations proved. She observed that The Panel should consider all the evidence both written and oral and submitted that all the evidence supported the case presented by the UKCP. She said that Client A gave clear evidence as to the dynamic of her relationship with the Registrant and how this affected her. She considered the events from different perspectives and how the relationship developed. She submitted that it was clear that Client A regarded the relationship as therapeutic or therapy and reminded the Panel that there are the references two matters akin to therapy including therapy pre therapy inquiries as to Client A's psychological well-being and offers to assist with that.
45. Ms Walmsley submitted that Client A was credible reliable and her evidence was an indicator of what was likely to have occurred. Regarding the Registrant, she reminded the Panel that she had provided

an extensive written response and the Panel should carefully consider how she dealt with the allegations but also consider what weight could be applied to her evidence bearing in mind that it had not been challenged. She submitted that there were aspects of the Registrant's evidence which begged further questions because they were inconsistent with or undermined by the documentation. She submitted that minimal weight should be given to the Registrant's statement due to the lack of challenge. Regarding the submissions made by the Registrant's solicitors, she again cautioned the Panel regarding this since theses had been made without reference to all the evidence and in particular without hearing Client A. Whilst they were based upon the documents and the witness statements, they did not deal with the weight to be applied to the Registrant's evidence nor to the clear contradictions between her written evidence and that of Client A. In short Ms Walmsley submitted that Client A's evidence was to be preferred.

46. Ms Walmsley submitted that the principle issue relevant to all allegations was the nature of the relationship between Client A and the Registrant. She said this was more than just being a professional mummy and, whilst it may be labelled in that way by the Registrant, it expanded way beyond that. She reminded the Panel that there were discussions regarding Client A's eating disorder, her intent to take her own life, and other matters all of which had therapy related content. In addition there were discussions with therapeutic content which the Registrant brought forward.
47. Ms Walmsley suggested that Client A's reaction to events was entirely understandable, that is she was profoundly confused as to whether the Registrant was a mummy or a therapist which seemed to depend upon how the Registrant felt at the time. She suggested that the argument about being a mummy or therapist became circular and suggested (using an adage) that if the Registrant walked and talked like a therapist then she probably was a therapist. She submitted that even though therapy was not offered by the Registrant under her 'professional mummy' name it was very much a therapeutic relationship and that is what created the problems. Even though she purported to function as "Mummy Grace", because of the therapeutic relationship the Registrant failed to adhere to professional boundaries. She said this blurring of roles permeated the entire relationship and resulted in the consequences and allegations before the Panel.
48. Ms Walmsley said that several of the alleged facts were not actually in dispute, what was in dispute was whether the relationship was that of a professional mummy or a therapist and whether the events occurred during a therapeutic relationship. In addition, she said it appeared that the Registrant relied upon discussions/events being undertaken at Client A's request. She submitted that even if this was correct, it did not negate the fact that therapeutic services were rendered and these required clear delineation. Who started the process did not negate the need for boundaries.
49. As to the issue of consent, Ms Walmsley cautioned the Panel to treat verbal or implied consent with care. She said it was not clear what the Registrant was saying in regard to implied consent. She submitted that the Panel should pay attention to the pre-meeting discussions, the form in which Client

A had said she did not want to be undressed etc and consider Client A's vulnerability. She reminded the Panel that Client A had said she felt a need to please the Registrant and maintain their relationship. That was a clear power dynamic in play and she noted that Client A regretted that she could not say anything to stop the actions of the Registrant.

50. In answer to questions from the Panel, Ms Walmsley submitted the relationship between the Registrant and Client A was very confused over a long period of time. She conceded that it may be the relationship started with the Registrant acting as a professional mummy but it became otherwise from at least the 7th online session. From there it started to take a therapeutic course. She said that the way the Registrant delivered her services was well beyond the scope of "Mummy Grace", there was talk of therapeutic ideas and goals, and the Registrant had a therapeutic relationship with Client A. She submitted that from this point she was ethically within the confines of what the UKCP regulated and she needed to ensure the boundaries were clear, communicated, and upheld. Even when Client A said the Registrant was more of a friend, Ms Walmsley said there was a lack of care by the Registrant. This was because of the way the relationship was operated, provided and advertised as being provided by a psychotherapist drawing on therapeutic care and experience. All of this required clear boundaries.
51. When asked if there was in fact a triple relationship of psychotherapist, 'professional mummy' and friend, Ms Walmsley said it was not simply a question of the Registrant advertising herself as a psychotherapist and then providing this service. The issue was how the dynamic grew and the fact that psychotherapy permeated all of it. Ms Walmsley said it was not a binary choice between 'was the Registrant a mummy or a psychotherapist', since the "Mummy Grace" service itself was not the issue. The issue was that although she operated under that name the Registrant brought in all the therapeutic elements and placed herself in the role of psychotherapist. That being the case she was not simply "Mummy Grace"; she was "Mummy Grace" and a UKCP registered psychotherapist. Ms Walmsley said that the Panel was not being asked to consider whether such services as "Mummy Grace" were ever appropriate, they were being asked to consider whether there were sufficient boundaries in place in the relationship they were examining.

Determination of Facts

52. The Panel considered all of the documentary evidence before it, including the statements, documents and submissions lodged on behalf of the Registrant, and the written and oral submissions from Ms Walmsley summarised above.
53. The Panel accepted the advice of the Legal Assessor. This included advice as to the burden and standard of proof, that no adverse inference was to be drawn from the Registrant's non-attendance, if and how to consider the weight to be given to the Registrant's statement and documents, her good

character, the issue of consent, the meaning of inappropriate and unprofessional and a suggestion as to the order in which the allegations may be considered.

54. The Panel determined that it would draw no adverse inferences from the Registrant's non-attendance. Rather it considered that it should assess the written and oral evidence taking account of where assertions were supported or contradicted by documentation, or where they had or had not been challenged, and then draw such inferences or conclusions as seemed fair, sound and in accordance with the burden and standard of proof.
55. The Panel was of the view that it should first determine whether there was a psychotherapeutic relationship between the Registrant and Client A. The Panel considered this to be a precursor to the case, since if there was such a relationship (as contended by the UKCP) the Registrant was subject to regulation by the UKCP. Conversely if there was no such relationship and the Registrant's activities as "Mummy Grace" were entirely out with her practise as a psychotherapist (as argued by the Registrant) then her actions in that role are not subject to regulation.
56. On balance, having fully considered the above, the Panel made the following findings:

Allegation Three

Between November 2020 and February 2024, you engaged in both a professional mummy and psychotherapeutic relationship with Client A.

Denied – Found Proved

- (i) The Panel observed that in cases such as this the allegation is usually that a professional relationship turns into a personal one. Here the reverse was the case with the allegation being that a personal service provided by the Registrant, that of being a professional mummy, became a professional relationship in all but name. As such it was subject to professional regulation, boundaries and codes of conduct.
- (ii) The Panel noted that there is no boundary or agreed definition to the role of professional mummy other than that the 'mummy' should attend to the 'little state' of the client. There was a considerable amount of evidence from which to conclude the Registrant did not confine matters to Client A's 'little state' but actively engaged her adult state going into all manner of subjects that are the purview of a therapist. She brought her knowledge and understanding of her psychotherapeutic work to her role as a professional mummy, doing so from the outset through her "Mummy Grace" website in which she referred to herself as being a trained and regulated psychotherapist.
- (iii) Client A gave clear evidence of therapeutic issues being discussed. These included having therapeutic goals, the Registrant encouraging her to share everything and suggesting that she could only save herself if she did so. Client A referred to the Registrant having 'formulations' for her and it was notable that in the audio-clips the Registrant refers to therapeutic

metaphors and said she was acting as a therapist for Client A's 'big state'. Despite the Registrant denying that she was Client A's therapist, she also said on several occasions that she was, or that there was a crossover in the roles of therapist and mummy and she was applying her therapeutic knowledge to the latter.

- (iv) It was notable that it was Client A who sought to introduce boundaries and the Registrant said at one point that she (the Registrant) was *'fucking up because it was all about me and I do not know how to be accountable'*. The Panel took this to be a clear indicator that the Registrant was uncertain as to the boundaries of her role, whether she was crossing them and/or whether the relationship should be regulated by her professional body. In addition her supervisor informed her that she was breaching boundaries. She must have realised this was a clear indicator that she was in a therapeutic relationship.
- (v) The Panel recognised that the Registrant has an interest in the non-sexual needs of people within the fetish community and she is seeking to advocate for those who present in infantilised states. However, she failed to properly contract with Client A who is not part of that world and did not seek to have her 'little state' investigated or attended to by the Registrant. She sought friendship and support. The Panel understood the Registrant's stated intentions to be good but it regarded her practise of acting as a 'professional mummy' to be one which was confused with psychotherapeutic ideas in a way that was completely outside the norm.
- (vi) The Panel noted the characterisation of the relationship by Client A, that although it started as a professional mummy service, within about two months the Registrant was acting as a helper and within about seven months she was acting as therapist.

Allegation One

Between at least November 2018 and March 2024, you advertised your status as a registered psychotherapist to support your professional mummy business.

Denied – Found Proved

- (i) The Panel noted that the Registrant's website included reference to her experience as a nurse and a psychotherapist. The Panel could conceive of no reason other than that this was done to demonstrate her knowledge and experience and, as the Registrant observed, it was to demonstrate she was a safe person. By her own explanation she was using her professional status to promote herself as a reliable person when in the role of a professional mummy. In addition the UKCP logo was on her advertising and she referred to herself as a qualified and accredited psychotherapist. (She did the same in respect of being a qualified nurse.) All of this doubtless did and was intended to bolster her image in the eyes of her potential clients.
- (ii) Whilst the Registrant claims that her work streams as 'professional mummy' and psychotherapist are entirely different that is contradicted in her own statement (on her

website) where she says she cares for the 'littles' through a synthesis of her work as a qualified nurse and psychotherapist in which she works with adults.

- (iii) Client A gave clear evidence as to the effect of the Registrant's advertising and her inclusion of the information that she was a psychotherapist, namely that it had the desired effect of persuading Client A that the Registrant was indeed a safe pair of hands and someone she could trust and get in contact with which of course she subsequently did.

Allegation Two

Between November 2020 and February 2024, you did not manage the boundaries of your relationship with Client A in that you, at times, encouraged Client A to open up to you about her mental health and to see you as her psychotherapist.

Denied – Found Proved

- (i) The Panel noted that early in the relationship Client A disclosed that she had been approved for assisted suicide in Switzerland. With that knowledge it is questionable whether the Registrant should ever have engaged with Client A let alone doing so without the safety net provided to them both by the adherence to professional boundaries and codes of conduct. In addition the Registrant encouraged Client A to speak of her family, her eating disorder, her personal history and previous therapists. It was notable that the Registrant criticised those therapists and undermined the family support available to Client A creating a dependency to which Client A referred in her evidence.
- (ii) By December 2023 it was notable that the Registrant said she 'cannot switch off the psychological stuff'. The Registrant had previously commented that she 'loved Client A talking about her feelings' and she advised her that 'only she could save herself', and that to do so she should share everything with the Registrant.
- (iii) Client A was notably confused regarding the relationship between them and the role assumed by the Registrant. It reached a point where Client A even asked whether they should bring an intermediary between them to negotiate the relationship however this was something the Registrant did not respond to. Concerning the roles adopted by the Registrant, in the first in-person visit this included her role-playing the part of a mother with a baby which Client A explicitly said was not something she sought albeit she felt obliged to acquiesce in it. In the second in-person visit the Registrant took more of the role of a friend, going for walks, watching TV and playing games. The visits themselves were over several days and for many hours per day and appeared to be entirely without boundary. In addition the Registrant shared information about herself, her relationship with her boyfriend and where they may live and, she did not maintain the boundary of time within sessions.
- (iv) The Panel recognised that going for walks and having friendly chats, if managed appropriately, may not be objectionable but in this case they are to be seen in the context of the Registrant encouraging Client A to open up about her mental health in what she

described as a rapidly expanding role with the Registrant encouraged her to talk about her developmental history, family history and suicidal ideation. These are clear indicators of a therapeutic relationship that required professional boundaries to be in place.

- (v) The Panel observed that Client A appeared to have more awareness of boundaries being breached and she brought this to the Registrant who appeared unable or unwilling to recognise this. The Registrant referred to her experimental work and to herself as being Client A's therapist but she put no boundaries in place around what clearly and quickly became a therapeutic relationship.
- (vi) Finally the Panel noted that as far back as 2013 the Registrant took advice from her supervisor regarding boundaries. She was advised by her supervisor that the UKCP had said her role as a 'professional mummy' was not incompatible with her professional status provided the two were entirely separated and "*siloed*". The Panel was of the view that little if any of the facts or circumstances described by Client A and/or admitted by the Registrant, could be described as being in a silo.

Allegation Four

Between November 2020 and February 2024, you:

a. Engaged in a personal relationship with Client A;

Denied – Found Proved

- (i) Client A gave clear evidence that the Registrant shared details of her personal life such as her relationship with her boyfriend, where they may live, her feelings and actions such as possibly shaving her hair to represent the personal changes she had made. When they met they went on walks together, watched TV, and Client A spoke of the Registrant as being a paid friend. There was continued confusion due to the informality and lack of timekeeping.
- (ii) Many of the facts were not disputed, rather it was the Registrant's case that all of this was part of her work as a 'professional mummy' and entirely outside her work as a psychotherapist. The Panel rejected her view of events as being little more than the Registrant giving herself licence to do as she pleased when she ought to have understood that she was in a professional relationship which had become a personal one.

b. Sent hundreds of Twitter messages to Client A outside of scheduled sessions, including messages of a personal nature (Appendix A);

Denied – Found Proved

- (i) The Panel saw numerous such messages in the bundle spread over nearly 500 pages. They included clear references to personal matters and appeared to be sent, received and responded to at all times. This communication appeared to be without boundary and at a time when the Registrant was in and ought to have realised she was in a professional psychotherapeutic relationship as stated above.

- (ii) Again the Panel considered the Registrant's assertion that this had nothing to do with her practice as a psychotherapist. It rejected that assertion for the reasons given above.

c. Offered longer sessions to Client A at no extra cost;

Denied – Found Proved

- (i) The Panel noted that there were numerous occasions on which sessions overran with no additional charge. In addition Client A described her confusion regarding what she was paying for. On the one hand she said the Registrant was retracting services but charging therapeutic rates, on the other hand she declined Client A's offer to pay US rates. By the end of these events Client A said she was unsure what she was paying for.
- (ii) Again the Panel considered the Registrant's assertion that, if sessions overran, this had nothing to do with her practice as a psychotherapist. It rejected that assertion for the reasons given above.

d. Called Client A pet names, such as "sweetness" and "my love";

Denied – Found Proved

- (i) The Panel noted that there were numerous occasions when such terms of endearment were used by the Registrant as indeed were others. This was clear from Client A's evidence, the documentation and from the Registrant's own version of events.
- (ii) The Panel rejected the Registrant's assertion that this had nothing to do with her practice as a psychotherapist for the reasons set out above.

e. Told Client A you loved her and had the "warm fuzzies" for her;

Denied – Found Proved

- (i) This statement was audible in the sound clip of the 17 March 2021 and was evident from Client A's statement.
- (ii) The Panel rejected the Registrant's assertion that this had nothing to do with her practice as a psychotherapist for the reasons set out above.

f. Discussed your own personal issues with Client A.

Denied – Found Proved

- (i) Client A gave evidence of the Registrant discussing her personal relationship, where she and her boyfriend may live, her attitude to some of her friends and that she was considering shaving her hair. In addition it was notable that the Registrant gave voice to her personal feelings for Client A saying she 'genuinely loved her' and she had 'discovered what made her happy' which she said was Client A. She also disclosed her view of her NHS core skills as 'they rock' and being 'way above a statistical anomaly'.

- (ii) In the Panel's view all the above are personal matters. Again the Panel rejected the Registrant's assertion as to the context within which the statements should be viewed.

Allegation Five

Between 28 January and 30 January 2023, you saw Client A for an in-person professional mummy visit. During this visit, you kissed Client A's head, stroked her hair and cuddled her.

Denied – Found Proved

- (i) Client A gave clear evidence of the allegation both in her statement and in her oral evidence. It was notable how she appeared surprised and perplexed by the Registrant's actions and, owing to the power dynamic, she acquiesced in such conduct.
- (ii) Whilst the Panel recognised that the conduct occurred when the Registrant saw Client A in the guise of professional mummy, this did not absolve her from her professional responsibilities. They were at this time also clearly in a psychotherapeutic relationship which the Registrant conducted almost without boundary.
- (iii) The Panel rejected the Registrant's characterisation of events for the reasons set out above.

Allegation Six

On 29 January and 30 January 2023, you removed Client A's clothes, rubbed ~~baby lotion~~ Sudocrem onto her buttocks and put a nappy on her.

Denied – Found Proved

- (i) Client A gave clear evidence of the allegation both in her statement and in her oral evidence. It was also conduct the Registrant accepted had occurred.
- (ii) Client A described herself as being 'mortified' by what the Registrant did and explained why she felt unable to prevent it from happening. She explained that she had regressed somewhat and as a child felt less able to challenge the Registrant. In addition she felt a desire to please the Registrant who appeared disappointed when she did not at first want this.
- (iii) The Panel rejected the Registrant's characterisation of these events for the reasons set out above.

Allegation Seven

On 30 January 2023, you spoon-fed Client A.

Denied – Found Proved

- (i) Again Client A gave clear evidence of the allegation both in her statement and in her oral evidence. It was also conduct the Registrant accepted had occurred.

- (ii) The Panel rejected the Registrant's characterisation of the event for the reasons set out above.

Allegation Eight

On 30 January 2023, you removed Client A's nappy. You then used wipes on her.

Denied – Found Proved

- (i) Once more Client A gave clear evidence of the allegation both in her statement and in her oral evidence. It was also conduct the Registrant accepted had occurred.
- (ii) The Panel rejected the Registrant's characterisation of the event for the reasons set out above.

Allegation Nine

Your actions at paragraphs 6 – 8 above occurred without Client A's consent.

Denied – Found Proved

- (i) Within her statement and in her evidence Client A made it quite clear that she did not want the Registrant to rub Sudocrem on her buttocks or take her clothes off or put her in nappies. She described the Registrant being disappointed at this and her desire to make the Registrant happy.
- (ii) Whilst she did not specifically address being spoon-fed the Panel was of the view that there was a clear power dynamic in play and the Registrant should have been aware of this.
- (iii) The Panel noted that the first form completed by Client A is completed "N/A" with respect to physical contact – understandable since they were meeting online, but that the second form makes no mention of nappies. In addition there was no written consent form covering the Registrant's actions, and Client A said in 2022 that she did not wish to wear children's undergarments. There appeared to be no return to this issue in 2023 when these events occurred. [REDACTED]
- (iv) Client A expressed the view that she wished the Registrant had respected their discussions. She described being unable to say no due to her regression into an inner child, wishing to please the Registrant and she spoke of the Registrant's character.
- (v) The Panel was of the view that although Client A acquiesced in what the Registrant did she did not give informed consent. She may have consented procedurally and gone along with what the Registrant did in the moment but she explained why this was namely, to meet what she perceived to be the Registrant's needs and disappointment.
- (vi) The Panel accepted Client A's clear evidence that she did not in fact want such actions to occur and it concluded that her acquiescence was not consent as contended by the Registrant.

Allegation Ten

Between 12 August and 14 August 2023, you saw Client A for an in-person professional mummy visit. During this visit, you kissed Client A's head, cuddled her and went for public outings together.

Denied – Found Proved

- (i) Client A gave clear evidence of this visit in both her statement and in oral evidence.
- (ii) The visit and the facts alleged as occurring were not disputed by the Registrant
- (iii) The Panel rejected the Registrant's view that this was not part of her role as psychotherapist for the reasons set out above.

Allegation Twelve

On 28 February 2024, you ended your relationship with Client A via Twitter.

Denied – Found Proved

- (i) Client A provided clear evidence concerning this and it is evident from the bundle of Twitter communications.
- (ii) Client A described her attempts to remain in contact with the Registrant and that she received little if anything in reply. That too is evident from the bundle.
- (iii) The Panel was satisfied that the Registrant's communication on 28 February was intended to and did end the relationship. Whilst it may have 'sputtered on' for a short while it was to all intents and purposes over as the Registrant clearly intended.

Allegation Thirteen

Your actions at paragraphs 1 – 12 above were:

- a. Inappropriate; and/or

Denied – Found Proved

- (i) The Panel was of the view that the Registrant was clearly working in a therapeutic relationship with an extremely vulnerable and potentially suicidal client. She was doing so in a wholly unregulated and unboundaried way operating well beyond her expertise and beyond what was safe. The Panel was of the view that the Registrant's justification for her actions, that it was all part of an entirely different workstream, was self-serving and without merit.
- (ii) The Registrant's conduct as set out in the Allegations was inappropriate. She utilised her professional status to advertise and attract clients and, in the case of Client A, she was within months operating in a therapeutic relationship without safeguards or a clear contract. It included the above conduct which in the opinion of the Panel was individually and collectively inappropriate.
- (iii) The Panel regarded it as notable that despite her clear lack of animus toward the Registrant Client A, with hindsight, came to regard the Registrant's actions within her guise as "Mummy Grace" as "*predatory*".

- b. Unprofessional.

Denied – Found Proved

- (i) The Panel adopts the reasoning set out above.

- (ii) The Panel determined that the conduct was so serious as to properly attract the epithet of ‘unprofessional’.

Allegation Fourteen

The behaviours set out at paragraphs 1 – 13 above are in breach of UKCP Code of Ethics and Professional Practice 2019 (“the Code”). In particular, you:

- a. Failed to act in Client A’s best interests, thereby breaching clause 1 of the Code.

Denied – Found Proved

- (i) The Panel determined that the Registrant took on Client A, a vulnerable and suicidal person rather than signposting her to mainstream services. Thereafter she engaged in a process of her own devising with little or no scientific or professional basis, doing so in a way that can only be described as unboundaried and sidestepping the normal safeguards of professional practice and the specific safeguards adhered to by regulated psychotherapists. The Registrant engaged in all the conduct found proved in what she ought to have realised was a therapeutic relationship. None of this was in Client A’s best interests and it caused harm to her.

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

Denied – Found Proved

- (i) In conducting herself as described at ‘a.’ above the Registrant took little if any account of what Client A needed, rather she appears to have applied her experimental approach to Client A, unsupported by an accepted body of evidence, using baby-language and conduct that was neither sought by Client A nor was it respectful of her.

- c. Failed to respect Client A’s autonomy, thereby breaching clause 3 of the Code.

Denied – Found Proved

- (i) The Panel adopts its reasoning at ‘b.’ above and in addition observed that the Registrant failed to work within Client A’s wishes and expectations. She did not work in order to improve Client A’s autonomy but created a sense of dependence through which Client A was unable to resist or consent to the unwanted actions instigated by the Registrant.

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

Denied – Found Proved

- (i) The Panel noted Client A’s characterisation of the Registrant’s conduct as being “predatory”. Whilst the Panel has already observed that the Registrant appears to have started on this course of conduct with good intentions it is clear that she applied her own experimental, untested and unproven approach to Client A when assuming the role of “Mummy Grace”. Client A was particularly vulnerable and the Registrant ought to have realised this from the outset and acted upon it. Rather than decline to engage and

signpost/support Client A to professional services she applied the practises that she devised and wanted to apply rather than those Client A wanted or needed.

- (ii) The Panel regarded it as notable that by the end of the relationship Client A said she did not know what she was paying for. Furthermore when Client A challenged the Registrant regarding the lack of boundaries, the Registrant ignored or sidestepped this. Ending the relationship as she did, by text, after so many years was in itself abusive and harmful.

- e. Harmed Client A, thereby breaching clause 6 of the Code.

Denied – Found Proved

- (i) Client A spoke in her statement of being fragmented by her relationship with the Registrant. In addition certain aspects of her conduct had left her 'mortified'. She had clearly become dependent on the Registrant and spoke of the impact caused by the ending of the relationship, including an increase in panic, crying, grief and depression. This was harmful in itself but more so in the context of Client A's vulnerability.

- f. Engaged in a dual relationship with Client A, thereby breaching clause 8 of the Code.

Denied – Found Proved

- (i) Client A gave clear evidence of the confused dual and even triple relationship with the Registrant acting as therapist, mummy and friend. The style and content of the relationship was not disputed by the Registrant; rather she sought to justify it as being wholly out with her professional practice. The Panel has already rejected that suggestion and was satisfied that the Registrant did engage in a dual relationship doing so over a prolonged period.

- g. Failed to make considered and timely arrangements for the termination of the therapeutic relationship with Client A, thereby breaching clause 27 of the Code.

Denied – Found Proved

- (i) The Panel had sight of the Twitter communication in which the Registrant terminated the relationship. It noted the efforts Client A made to remain in contact and the minimal response by the Registrant.
- (ii) The Registrant's communication appeared to be self-serving and paid little if any regard to Client A's needs or to her potentially suicidal ideation.

- h. Failed to ensure that any communication in which you took part was carried out in a manner consistent with this Code, thereby breaching clause 34 of the Code.

Denied – Found Proved

- (i) The Panel was satisfied that in using her professional credentials when advertising services of her own devising and then in providing such services to Client A the Registrant adopted an approach that was entirely unprofessional. Her communications were

seemingly without boundary and used language that was outwith accepted professional practice.

- (ii) The Panel has already rejected the Registrant's justification for this namely that in her mind none of this was a part of professional therapeutic practice. The Panel would add that, even if this had been the case, elements of the advertising and communication were such as to adversely impact the profession and thereby were contrary to the Code.
- i. 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.

Denied – Found Proved

- (i) The Panel adopts its prior reasoning. In so doing the Panel noted the observation by Ms Walmsley that the role of 'professional mummy' may not itself be incompatible with that of the psychotherapist provided there were at all times secure professional boundaries. That was the advice given to the Registrant in 2013 – to keep her roles "siloed".
 - (ii) The Registrant did not keep her roles siloed, rather she used her professional status to attract clients. Having done so and attracted Client A she then used a number of therapeutic concepts in an uncoordinated and scattergun approach within the "Mummy Grace" role which was one of her own devising. She did so without boundaries and in a way that would in the view of this Panel horrify both colleagues and the public, bringing the profession into disrepute and undermining public confidence therein.
- j. Failed to report potential breaches of the Code to UKCP, thereby breaching clause 37 of the Code.

Denied – Found Proved

- (i) There is no evidence that the Registrant has reported herself to the UKCP.
- (ii) It is notable that prior to embarking on this course of conduct she was advised to keep matters siloed. She was challenged by Client A and she was advised by her supervisor that she was breaching boundaries. To date she appears to remain of the view that she has done nothing wrong.

57. In total the Panel found **10** breaches of UKCP's Ethical Principles and Code of Professional Conduct proved.

Determination of Misconduct and Impairment

58. This determination should be read in accordance with the Panel's previous decisions.

59. 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.

Submissions

60. The Panel received written submission from Ms Walmsley which she amplified in oral submissions. She invited the Panel to conclude that the facts found proved did constitute misconduct and submitted that the Registrant's fitness to practice is currently impaired. Ms Walmsley referred to the well-known authorities of *Roylance v GMC [1999] 1 A.C. 311* and *Nandi v GMC [2004] EWHC 2317* and the guidance they provide. She submitted that to constitute misconduct an act or omission must be serious. She submitted that the Registrant's proven conduct included an ongoing and lengthy therapeutic relationship which was poorly managed, conducted with profound difficulties and which involved significant and serious breaches of professional boundaries over a long period of time. She submitted this clearly amounted to misconduct.
61. As to current impairment, she referred to *Cohen v General Medical Councils [2008] EWHC 521* and the four questions from *CHRE v NMC and Grant [2011] EWHC 927* regarding prior conduct and future risk. She submitted that the Registrant had put clients at risk of harm, she had brought the profession into disrepute and had also breached one or more of the fundamental tenets of the profession. Ms Walmsley submitted that there was a continued risk of repetition regarding all three. (The fourth question which deals with dishonesty does not apply to this case.)
62. Ms Walmsley submitted that the Registrant used psychotherapeutic methods in her role as 'Mummy Grace' doing so despite persistent and ongoing breaches of boundaries and the Code. She suggested the evidence indicated the Registrant was aware of the blurring of boundaries, but even now there was no evidence of insight, reflection, learning from what had occurred nor consideration of what she needed to do to address these concerns. She said there was a risk going forward.
63. Ms Walmsley said the Registrant claimed to have changed her website to further delineate her 'professional mummy' role from her work as a psychotherapist but the screen shots from 2024 and 2025 demonstrated otherwise and the concerns remained. She said there were serious and extreme blurring of boundaries and the Registrant showed little if any insight into the concerns, rather she appeared to shift blame to Client A. She said the Registrant did not recognise the significant and serious nature of her conduct and she remained impaired.
64. Ms Walmsley suggested that the testimonials provided on behalf of the Registrant included statements from people who used her 'Mummy Grace' service and her supervisor. It was not clear how much of the case they knew about and the testimonials were now somewhat out of date. With regard to the submissions lodged on behalf of the Registrant, she submitted these should be treated with some caution since they were provided without hearing the evidence and without knowledge of the Panel's decision on the facts. Ms Walmsley submitted that both the testimonials and submissions should be afforded little weight.

65. The Panel received written submissions lodged on behalf of the Registrant and took note of the testimonials within the bundles. As to the submissions, it was averred that the Registrant's conduct only occurred when she acted in her role as 'professional mummy' and was not subject to regulation by the UKCP. It was said that this is an entirely separate business from her professional position as a psychotherapist and that the Registrant was at all times acting in the best interests of her clients. It was submitted that the Registrant's conduct did not amount to misconduct but that if the Panel found otherwise it could thereafter go on to consider the issue of impairment. It was submitted that the Registrant was a well-respected and diligent practitioner with no complaint made regarding her practice as a psychotherapist and that her actions as a 'professional mummy' did not render her currently impaired.

Decision on Misconduct

66. 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.

67. 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."*

68. In addition, the Panel had regard to the judgement of Collins J in *Nandi v GMC (2004) EWHC 2317 (Admin)* 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."*

69. The Panel determined that the conduct found proved does amount to misconduct.

70. In coming to the above conclusion Panel accepted that the Registrant believed she had identified a vulnerable group who are not well served with professional support and she sought to do so. However, the way she went about this as regards Client A, without direction, boundary or time limit led to Client A, in hindsight, to view her overall experience of the Registrant's conduct as 'predatory'. This was despite there being components within their relationship that she found positive and enjoyable. The Panel noted that Client A wished the Registrant had attended this hearing since she may then have understood more fully the harm caused to Client A. This is indicative of the fact that Client A had not felt heard especially regarding the ending of the relationship.

71. Despite Client A's overall misgivings and, with hindsight, her characterisation of the relationship as 'predatory' the Panel also noted that she did not consider the Registrant to have acted with ill intent. The Panel came to the same conclusion. There was no evidence to suggest sexual or financial exploitation on the part of the Registrant, rather the Panel concluded that she was sucked into her own beliefs regarding what she saw as a new methodology and blundered without direction.
72. The Panel determined that instead of the Registrant approaching this in a clear, carefully managed way to protect a vulnerable client and herself, she had no clear contract; she sought no professional guidance or feedback and she undertook no reflection upon what she was doing or where she was going. Had the Registrant sought guidance or reflected she may have recognised the dependency she created and fostered in Client A and she may have recognised that 150 sessions over a six-year period illustrated that she was working without direction or goal.
73. The Panel has already concluded that there was a therapeutic relationship between Client A and the Registrant, yet even now she does not accept this despite the fact that throughout the relationship she employed her psychotherapeutic knowledge and beliefs. In that relationship the Registrant acted on what she wanted to do (be a 'professional mummy') rather than act in accord with Client A's wants and needs. This was particularly apparent from the audio-clips and from Client A's reluctance to be treated as baby in nappies.
74. The Panel considered Client A to be particularly vulnerable and, the Registrant was aware of this. Despite this the Registrant imposed no professional or interpersonal boundaries on their relationship. The Panel has found that those professional boundaries that ought to have been in place were breached many times over an extended period. In addition, there was no consistent application of a coherent professional body of knowledge and real harm was caused to Client A.
75. Having determined that the Registrant's actions amounted to serious misconduct the Panel then went on to consider the question of impairment.

Decision on impairment

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

77. The Panel applied the approach to determine the question of impairment used by Dame Janet Smith as set out in the 5th Shipman Enquiry and cited with approval in the case of *CHRE v Grant* (above):
“Do our findings of fact in respect of the [Registrant’s] misconduct, deficient professional performance, adverse health, conviction, caution or determination show that his/her fitness to practise is impaired in the sense that s/he:

- a. Has in the past acted and/or is liable in the future to act so as to put a [client 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 [of psychotherapy] 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.*

78. 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.

79. 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.”

80. In considering the four questions a – c above (d being irrelevant to this case) the Panel concluded that all could be answered in the affirmative. The Panel found there were numerous fundamental breaches of professional standards by the Registrant and that she caused harm to Client A. From the outset the Registrant did not clearly contract or set out the process and she imposed no boundaries or guardrails to protect a very vulnerable client and/or to protect herself. She undertook no effective review of the relationship despite it continuing for 150 sessions over six years. Instead she purported to have frequent resets but did not follow these through with any clear or concerted change of direction. This was despite Client A’s explicit concerns. During that time, she denigrated other practitioners and Client

A's family, thereby isolating Client A and inducing a state of dependency. Having induced that state, the Registrant did nothing constructive to support Client A in moving forward. Indeed, it is clear that the Registrant's role as a 'professional mummy' explicitly fosters a state of dependency and did so in Client A. Having done this, the Registrant did not refer to any established guidance to temper or guide her work. The Registrant showed no attunement to Client A's needs or her distress at the lack of boundaries and failed to assess her negative impact on Client A.

81. The Panel has found that in acting as she did the Registrant did not act with malintent but, it is clear she undertook no professional evaluation of what she considered to be a pioneering process either before during or now after these events. There is no evidence of work with skilled colleagues or psychiatrists to inform her work with clients who experience dissociated states, rather she employed a somewhat mechanical and fetishised process with Client A that did not meet her needs.
82. The Panel has seen no evidence of reflection or recognition by the Registrant that she was in a therapeutic relationship with Client A or that her role as 'professional mummy' is likely to be one that required very careful and continued consideration by her in concert with other professionals. Whilst the Registrant expressed regret at causing harm to Client A this is very much caveated in the terms 'if I caused harm' it was unintentional and it was not during professional practice. It would appear that she still does not accept that her relationship with Client A was not siloed in the way that she was advised it should have been, and it clearly became a dual if not triple relationship.
83. The Panel concluded that the Registrant has shown no insight into the risks posed by her conduct or that the risk continues. There is no evidence of reflection and no learning to address them. As such the Panel concluded that there remains a risk to clients and to the standing of the profession and the Registrant's fitness to practice is indeed impaired.

Determination on Sanction

84. In accordance with rule 7.25 of UKCP's Complaints and Conduct Process, the Panel then went on to consider the question of sanction. This determination should be read in accordance with the Panel's previous determinations on the facts, misconduct and impairment.

Submissions on Sanction

85. Ms Walmsley reminded the Panel that the purpose of sanctions was to protect the public to 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. She suggested that there were the following aggravating features in the case; the course of conduct was prolonged and involved multiple breaches of boundaries, there was a detrimental effect upon Client A, boundaries were persistently breached including personal boundaries, although she emphasised that this was not a case in which

sexual boundaries had been breached. Nonetheless she submitted that because of the interpersonal contact this case went beyond a simple failure to maintain boundaries. Regarding the submissions lodged on behalf of the Registrant, again she said these predated the evidence and the findings and she submitted that a conditions of practise order was not appropriate.

86. Regarding any insight demonstrated by the Registrant, Ms Walmsley criticised the submissions lodged on behalf of the Registrant and said that the Panel had found and there was a lack of insight. As to the admissions made by the Registrant they were caveated on the basis that her conduct was undertaken when she was engaged in an entirely separate identity from that of her professional practise. That had already been rejected by the Panel and again it indicated that the Registrant had no insight into why all this had occurred.

87. In terms of mitigating factors Ms Walmsley said that it had not been the Registrant's intention to act in the way that she did, the issue here was her ongoing lack of insight. She said that it was important to note the Registrant had no previous complaints to her name.

88. Concerning why Ms Walmsley said that a Conditions of Practice Order was not appropriate she said it did not meet the seriousness of the case nor was it possible to formulate a workable set of conditions. In addition there was no evidence to suggest the Registrant was able or willing to abide by conditions even assuming they could be drawn up. Miss Walmsley suggested that none of the lesser sanctions met the seriousness of the case and that termination was the only sanction that reflected this.

89. The Panel received written submissions lodged on behalf of the Registrant. These addressed the basis for and purpose of sanctions, the issue of proportionality and the need to address whether there are particular aggravating or mitigating circumstances. The submissions outlined the various sanctions available and concluded as follows:

"...it is submitted [on behalf of the Registrant] that in the event that some or all of the allegations against her are found proved the most appropriate sanction would be one of conditions. If it was felt that the findings are so serious that a period of suspension is the only appropriate sanction, it is requested that any period is as short as commensurate with the findings of the Panel to protect not only CM's ability to practice going forward but also protect the interests of her clients and yet still protect the wider public from any future risk. When determining sanction, the Panel are invited to take into consideration the fact CM has already been penalised in respect of the complaint against her due to the 14-month interim suspension to CM's UKCP registration which has been in place whilst this complaint has been considered."

Decision on Sanction

90. In reaching its decision, the Panel had regard to the UKCP's Indicative Sanctions Guidance 2019 ("the ISG") but exercised its own independent judgement.

91. The Panel heard and 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 the least impactful to meet the risks identified by the Panel weighing the public interest with that of the Registrant.
92. 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.
93. 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 proportionate and appropriate in the circumstances.
94. The Panel first considered whether there were any particular aggravating or mitigating factors in the case. Concerning aggravating factors, the Panel has already found that the misconduct is serious. However, the Panel was of the view that the following factors did indeed aggravate that finding. The Registrant's contact with Client A commenced and continued without any form of contract, it was prolonged and damaging and, when Client A raised concerns regarding professional boundaries the Registrant ignored them. The course of conduct extended over six years without professional oversight and outside the auspices of the UKCP despite the fact the Registrant drew upon techniques used in mainstream psychotherapy which would have indicated that she was operating in a psychotherapeutic relationship.
95. The Panel was particularly concerned by the fact that from the outset the Registrant was aware she was dealing with an extremely vulnerable client and that her conduct held a potential life or death significance. Client A's suicidality should have been at the top of the Registrant's agenda but instead she denigrated Client A's professional and family support and provided little if any expert input to replace this. Her support was piecemeal and without direction. The Registrant overreached her position in way that indicated a gross lack of self-awareness and a gross misunderstanding of her position when in the guise of 'Mummy Grace'.
96. Regarding mitigating factors, the Panel recognised that the Registrant was a practitioner of good character and that others spoke highly of her. In addition, it recognised that this was not a case of sexual or financial exploitation. Furthermore, whilst the Registrant used her professional status to set up and legitimise her role as "Mummy Grace", she did not set out with the intention of creating the difficulties that ensued. There was no malintent. This was a case of the Registrant not recognising the risks that her course of action created, despite her years of experience and knowledge.

97. Whilst the Panel acknowledged that the Registrant has made some admissions and an apology these were caveated in terms “if I have harmed” rather than ‘I am sorry I have harmed’. The admissions were without recognition of the central issue in this case, namely that she acted as a psychotherapist when in the guise of ‘Mummy Grace’ and she still does not recognise this fact.
98. The Panel has set out in detail above the nature of the conduct found proved, the boundaries that were breached, the period of time over which this occurred and whether there is a likelihood of repetition. In short, the Registrant’s conduct was prolonged, serious and harmful to Client A. She has demonstrated no insight into this and has provided no evidence to suggest she is either willing or able to remediate her misconduct.
99. The Panel recognised that these proceedings have had an adverse impact upon the Registrant’s health and her financial situation. However, it also recognised the principle that being part of a regulated profession is a privilege, and this carries such consequences should complaints be made and misconduct proven. The Panel reminded itself that the public interest must necessarily outweigh private interest when considering the appropriate sanction necessary to protect the public and meet the overarching objective of these proceedings.
100. 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. No apology had been offered and there was no evidence from which to conclude that the Registrant would be willing to make such an apology now. There was no evidence to suggest an apology would be meaningful given the Registrant’s lack of insight.
 - b. Warning

The Panel adopts its above reasoning. Again, 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 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 no evidence that the Registrant had accepted and reflected upon her wrongdoing.
 - d. Further training

The Panel adopts the above reasoning. Furthermore, it had seen no evidence of learning to date or a willingness to undertake training to meet the risks identified by the Panel.

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. The Panel noted that such supervision as the Registrant undertook during her 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. Regarding therapy, whilst the Registrant may have health issues these were not causative or contributory to her misconduct.

f. Conditions of Practice Order

The Panel next considered whether the impairment could be addressed by placing conditions on the Registrant's practise. The Panel noted the submission's made on her behalf. However, the submissions were somewhat generic. They did not address the seriousness of this Panel's findings and what if any conditions would be needed to address these and the continuing risk to the public. No conditions were suggested and the Panel was of the view that none could be devised such as would protect the public.

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 boundaries and had caused harm to Client A. She had demonstrated no insight into this to date and there was no evidence from which to conclude that a period of suspension would engender such insight. The Panel noted the Registrant's concern at having been suspended during these proceedings. Her concerns were about herself, her practise and her finances. There was again no evidence of reflection or learning during or because of the suspension. There was no evidence to suggest that she had the capacity to learn if she were to be suspended for a further period.

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 serious misconduct and had no insight into her impairment. She ignored any indicators of error and appeared to have no understanding of the harm caused to Client A. There was no evidence of reflection, learning, insight or consideration of how she may change her work as a 'professional mummy' to protect the public and the reputation of the psychotherapeutic profession. The Panel saw no evidence to suggest that she was capable of such consideration or change and as such Removal was the only sanction that would protect the public and the profession.

101. The Panel determined that the appropriate sanction is Removal of the Registrant from the UKCP Register.

Application for an interim suspension order

102. Ms Walmsley 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.

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

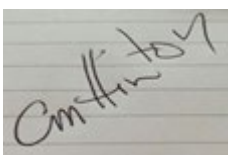
104. The Panel considered that an ISO in the terms sought by Ms Walmsley was necessary to protect the public and was in the public interest. In addition, not imposing an order would be inconsistent with the Panel's finding of an ongoing risk to the public and to the reputation of the profession.

Right of Appeal

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

106. 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 28th day.

Signed,

A handwritten signature in black ink on a white background. The signature appears to be 'C. Hinton' written in a cursive style.

Catherine Hinton, Lay Chair

11 July 2025