



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

**3 November and 5 December 2025
ONLINE**

Name of Registrant:	Steve Williams (HIPC)
Heard by:	Adjudication Panel
Panel Members:	David Crompton (Chair) Maureen Anderson (HIPC) Stephen Coulter (CFCST)
Legal Assessor:	Martin Lanchester, Guildhall Chambers
Panel Secretary:	Bethany Rees
UKCP Presenting Officer:	Kriti Upadhyay, Guildhall Chambers
Registrant's Representative:	Unrepresented and present
Charges found proved:	1, 1a, 1b, 1c, 1d, 1e, 1f, 1g, 2, 3a, 3b, 4a, 4b, 4d, 4e, 4f
Charges found not proved:	4c
Panel decision:	Misconduct found, not currently impaired.
Sanction:	No sanction to be imposed.

Detail of allegations

That being a UKCP registered psychotherapist since 1 July 2003, you, Steve Williams, (the Registrant), who were in a therapeutic relationship with Client A from May 2022 to December 2024:

1. Whilst in a therapeutic relationship with Client A, you sent a series of inappropriate text messages to her including: admitted
 - a. "you needed a fucking ambulance yesterday, you need one today! For fuck sake"
Admitted
 - b. "no you listen to me for once. For fuck sake!"
Admitted
 - c. "can't see now either or you would ring for a fucking ambulance"
Admitted
 - d. "ok I give up. AGAIN. You win"
Admitted
 - e. "as per you have made it impossible for anyone to help you"
Admitted
 - f. "you consistently make life so difficult for those around you who care"
Admitted
 - g. "I guess you're are giving everyone the great privilege of understanding just how helpless you feel"
Admitted
2. Whilst in a therapeutic relationship with Client A, you allowed her to accrue a debt of £800 in unpaid therapy sessions.
Admitted
3. Your conduct in Allegation 1-2 was:
 - a. Inappropriate; and/or
Denied
 - b. Unprofessional; and/or
Denied
4. The behaviour set out at allegations 1 - 3 above is in breach of the UK Council for Psychotherapy Code of Ethics and Professional Practice 2019 (the Code). In particular:
 - a. Failed to act in Client A's best interests, thereby breaching paragraph 1 of the Code.
Denied
 - b. Failed to treat Client A with respect, thereby breaching paragraph 2 of the Code.
Admitted

- c. Harmed Client A, thereby breaching paragraph 6 of the Code.
Denied
- d. You failed to manage boundaries with Client A, thereby breaching paragraph 8 of the Code.
Admitted
- e. You did not act in a way which upholds the profession's reputation and promotes public confidence in the profession and its members, thereby breaching paragraph 32 of the Code.
Admitted
- f. Failed to ensure that any communication in which you take part, and in particular your participation in social media, is carried out in a manner consistent with this Code, thereby breaching paragraph 34 of the Code.
Denied

Documents

The Panel had placed before it the following documents:

- A principal bundle on behalf of UKCP amounting to 81 pages, hereafter referred to as C1;
- A correspondence bundle on behalf of UKCP amounting to 48 pages, hereafter referred to as C2;
- Written submissions made on behalf of UKCP, amounting to 6 pages;
- The report case of *Thornycroft v Nursing and Midwifery Council* [2014] EWHC 1565 (Admin);
- A statement from the Registrants supervisor, dated 25 November 2025, amounting to 1 page, hereafter referred to as R1.

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. UKCP application to amend the allegations to revise the layout of the allegations
 - b. UKCP further application to amend the allegations to include a further breach at 4d.
 - c. UKCP further application to rely upon hearsay evidence

Amendment of Allegations

3. The Panel heard submissions from Ms Upadhyay in support of the proposed amendments to the allegations made up of a revised layout and the addition of a further allegation.

4. The Registrant did not oppose the amendments but noted that the late application to add a further allegation was stressful.
5. The Panel accepted the advice of the Legal Assessor.
6. The Panel decided to allow the proposed amendments having considered fairness to both parties. The change of layout of the charges did not materially change the nature of the allegations made and was therefore allowed.
7. UKCP's application to include a further new allegation was also allowed as it arose out of the same factual evidence as had already been served and was partially covered by the responses already provided by the Registrant. It was regrettable that the amendment was applied for at the very last moment as this was likely to have caused the Registrant unnecessary additional stress, but this did not result in any material unfairness to the Registrant.

Hearsay Application

8. Ms Upadhyay applied on behalf of UKCP to rely upon hearsay evidence in support of the allegations. Ms Upadhyay relied on the guidance provided in *Thorneycroft v NMC* in support of her application. The Registrant did not oppose the application although he did not agree with the opinion evidence that was included in the hearsay evidence that UKCP sought to rely upon.
9. The Panel accepted the advice of the Legal Assessor.
10. The Panel balanced the factors identified in the case of *Thorneycroft* and noted that there was no reason to suspect that the contents of the messages sent to Client A were not genuine or accurate and had been sent by the Registrant. In reaching these conclusions the Panel noted that the Registrant fully accepted sending the messages to Client A whilst she was in a therapeutic relationship with him. It was also noted that the Registrant accepted that he allowed Client A to accrue outstanding debts and that this evidence was also not in dispute.
11. The Panel concluded that having taken all the circumstances into account and notwithstanding the fact that the entirety of UKCP's evidence was hearsay and unsupported by any direct witness evidence, the evidence relating to the messages sent to Client A and debts that she had accrued were admissible hearsay evidence.
12. The Panel then considered other parts of the hearsay evidence and concluded that sections that included opinion evidence of witnesses with unknown knowledge, experience or qualifications was not relevant to the issues that remained in dispute and decided to exclude evidence that expressed opinion evidence relating to Client A. The Panel thereafter excluded all sections of the material relied upon by UKCP that included hearsay opinions held by others from their deliberations.

Determination of Facts

13. The Panel considered the documentary evidence before it and heard oral submissions from Ms Kriti Upadhyay on behalf of UKCP and the Registrant.
14. No live oral evidence was called on behalf of UKCP, and the case was presented on the basis of the hearsay evidence that had been admitted into evidence by the Panel.
15. The Panel heard evidence on behalf of the Registrant who gave evidence on affirmation. The Registrant gave details of the therapeutic relationship he had with Client A from May 2022 and the pressures that led to his sending Client A messages in June 2024 via WhatsApp as alleged. The Registrant detailed the complex difficulties Client A described that she experienced as she was struggling to manage complex mental health needs with limited support from service providers and showed signs of increasing dissociative episodes. The Registrant stated that he raised his concerns with his supervisor but had decided in the weeks leading up to his sending the WhatsApp messages to finish the therapeutic relationship with Client A as she was not well enough to be able to engage fully with psychotherapy. The Registrant gave further details of his increasing concerns for Client A's physical and mental health and his frustration and anger with her refusing to accept assistance from emergency services and that this led to him "flying off the handle" and sending the messages to Client A. The Registrant stated that he apologised to Client A afterwards and continued to work with her until the end of 2024. In hindsight, he accepted that his continued work with Client A was a mistake, and the situation was getting out of hand. This applied also to Client A's increasing debt which the Registrant admitted he should have dealt with differently and should not have allowed the debt to get out of control.
16. In answer to questions from the Panel the Registrant admitted in evidence that in relation to sending the WhatsApp messages to Client A and in relation to allowing Client A to accrue debts for his services that his behaviour was inappropriate and unprofessional as alleged in allegation 3a. and 3b.
17. The Registrant further accepted in evidence when asked that he did not act in Client A's best interests when he sent the WhatsApp messages to Client A and accepted the allegation 4a.
18. The Registrant accepted that his actions had the potential to cause harm to Client A but was not able to say whether in fact they had done so. He accepted that Client A would have been hurt by the messages that he sent to her.
19. The Registrant admitted in evidence that the messages that he sent to Client A were not carried out in a manner consistent with para 34 of the Code and he accepted the allegation 4f.

20. The Registrant was asked questions by Ms Upadhyay on behalf of UKCP.

21. The Panel heard and accepted the advice of the Legal Assessor.

22. On balance, having fully considered the above, the Panel made the following findings:

a. Allegation Three. Found Proved.

Your conduct in Allegation 1-2 was:

- a. Inappropriate; and/or - **Found proved**
- b. Unprofessional; **Found Proved**

Reasons for determination

The Registrant gave clear and unequivocal evidence on affirmation that he accepted that sending the messages to Client A was both inappropriate and unprofessional. The Panel found that the messages were clearly inappropriate for a vulnerable client with complex mental health needs and further that sending messages of this nature was also clearly unprofessional. The Registrant further admitted that allowing Client A to accrue debts of £800 was also inappropriate and unprofessional and the panel accepted this evidence.

b. Allegation Four (a) Found proved

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

Reasons for determination

The Registrant gave clear and unequivocal evidence on affirmation that he accepted that sending the messages to Client A was not acting in her best interests. The Panel further found that having heard from the Registrant about Client A's complex needs the decision to send the messages to Client A could not have been in her best interests and that the allegation was found proved.

c. Allegation Four (c). Found not proved.

Harmed Client A, thereby breaching paragraph 6 of the Code

Reasons for determination

The Panel found that there was no direct evidence of harm provided by UKCP either from Client A or anyone on behalf of Client A. There was no medical evidence or medical notes that could show any harm was caused to Client A as result of the allegations.

Whilst the Registrant accepted that there was a risk of harm arising out of his actions involving the messages that he accepted sending and Client A's accrued debt there was insufficient evidence to establish that Client A had, in fact, sustained any harm.

The Panel noted that the agreed facts concerning the WhatsApp messages and accrual of debt did not, of themselves, prove that harm was suffered by Client A or that harm was likely to be suffered. The fact that Client A did not want the complaint to be pursued and remained in therapy with the Registrant after the relevant events took place, and did not seek to bring any evidence against the Registrant was relevant to the issue of whether harm was caused.

The Panel took into account the content of the text messages between the Registrant and Client A and the accepted accrual of a debt but on balance found there was insufficient evidence that this caused Client A to suffer harm and the allegation was found not proved.

d. Allegation Four (f). **Found proved.**

Failed to ensure that any communication in which you take part, and in particular your participation in social media, is carried out in a manner consistent with this Code, thereby breaching paragraph 34 of the Code

Reasons for determination

It was accepted by UKCP that there was no suggestion that the messages were published or accessed by the public via social media but were instead direct messages via WhatsApp. Nevertheless, the messages clearly constituted 'communication' as set out in the allegation. The Registrant gave clear and unequivocal evidence on affirmation that he fully accepted that sending the messages was inconsistent with the Code and the allegation was admitted. The Panel found the allegation proved as the messages clearly were a form of communication which was carried out in a manner inconsistent with the Code in breach of para 34 of the Code.

23. In total the Panel found 16 breaches of UKCP's Ethical Principles and Code of Professional Conduct proved.

Determination of Misconduct

24. In accordance with rule 7.23 of UKCP's Complaints and Conduct Process, the Panel then went on to consider the question of misconduct. In addressing this question, the Panel took into account of the relevant information before it.

25. The Panel heard further submissions from Ms Upadhyay on behalf of UKCP on misconduct and impairment.

26. Ms Upadhyay, on behalf of UKCP, reminded the Panel of the 16 charges that were admitted or found proved and summarised parts of the Registrant's evidence concerning the events that led to the charges. Ms Upadhyay referred the Panel to the guidance provided in *Roylance v. General Medical*

Council [2001] 1 AC 311 concerning serious professional misconduct before moving on to issues surrounding impairment. Ms Upadhyay highlighted the need to consider whether the Registrant was impaired currently, rather than at the time of the events that led to the charges. Ms Upadhyay referred the Panel to the three stage test in the case of *Cohen v GMC [2008] EWHC 581* submitting that UKCP were content that the conduct that led to the charges was remediable but that the Panel would need to consider the second and third questions as to whether the impairment had in fact been remediated and whether it was highly unlikely to be repeated. Ms Upadhyay referred the Panel to the case of *CHRE v Grant [2011] EHC 927* concerning the Registrant's past conduct and the issue of future risk and conceded on the facts of this case that UKCP did not seek a finding of impairment based on bringing the profession into disrepute or dishonesty.

27. The Registrant relied upon a letter provided by his supervisor as part of his evidence and gave oral evidence to the Panel about the steps he had taken since the events that led to the charges. The Registrant confirmed that he was continuing with fortnightly supervision with his current supervisor and would remain in supervision until the end of his career. The Registrant gave evidence on how he had reviewed and considered the events that led to the charges and the impact his actions had and how seriously he took his actions. The Registrant described the extensive supervision and reflection that he had undergone and expressed his belief that he would never let himself get into the position that he had found himself in at the time and was now aware of the options that he could utilise should any similar circumstances arise. The Registrant stated that he recognised that his work with clients with trauma was challenging, and there was a line that had to be drawn when trying to offer psychotherapy and not drawing this line could inadvertently make matters worse. The Registrant stated that he had found the events that led to the charges had been a salutary lesson.

28. 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.

29. In addressing whether the facts proved amounted to misconduct, the Panel had regards to the words of Lord Clyde in the case of *Roylance v. General Medical Council*. He stated:

"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."

30. The Panel had regard to the judgement of Collins J in the case of *Nandi v General Medical Council (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."*

31. The Panel first considered the issue of misconduct. It determined that the Registrant's actions were serious breaches of the UKCP Code and would be found deplorable by members of the profession. The Panel found that the Registrant's conduct clearly did not meet the standards expected of a registered professional and had the capacity to adversely affect public confidence in the profession.
32. In light of the above, the Panel determined that the admitted and proved facts amounted to misconduct.

Determination of Impairment

33. The Panel then went on to consider the question of impairment. This determination should be read in accordance with the Panel's previous decisions in this case.
34. 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.
35. The Panel applied the approach to determine the question of impairment by Dame Janet Smith as set out in the 5th Shipman Enquiry and cited with approval in the case of *CHRE v Grant (2011) EWHC 927 (Admin)*:

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

- a. Has in the past acted and/or is liable in the future to act so as to put a patient or patients at unwarranted risk of harm; and/or*
- b. Has in the past brought and/or is liable in the future to bring the medical profession into disrepute; and/or*
- c. Has in the past breached and/or is liable in the future to breach one of the fundamental tenets of the medical profession; and/or*
- d. Has in the past acted dishonestly and/or is liable to act dishonestly in the future.*

36. 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 (2008) EWHC 581* and considered whether the Registrant's misconduct is easily remediable; has already been remediated; and whether it is likely to be repeated.

37. The Panel noted the view expressed by UKCP that issues regarding the wider public interest were not being put forward as a basis for the Registrants ongoing impairment. Nevertheless, the Panel was mindful that when considering impairment, it was 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. This was considered in the case of *CHRE v 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."

38. The Panel considered the questions posed in *CHRE v Grant* and *Cohen v GMC* in the context of the evidence that it had heard. The Panel considered the fact that the majority of the charges were admitted by the Registrant and were impressed by the open way in which the Registrant had approached the proceedings and the manner in which he gave his evidence. The Panel noted the Registrant had provided detailed and thoughtful insights about what led to his behaviour and the effect that it had on Client A. The Panel considered the events to be relatively isolated and confined to a short but difficult period of time for the Registrant. The Panel were reassured that the Registrant had no other matters brought to their attention in a long career working with challenging and complex clients. The Panel considered the Registrant to have shown appropriate levels of remorse and were reassured by the practical steps he had taken to avoid returning to a situation where similar events could occur.

39. The Panel concluded that the Registrant had remediated his impairment and it was highly unlikely that any similar behaviour would be repeated.

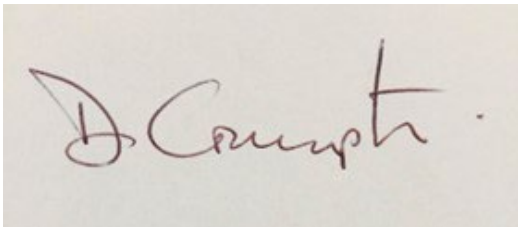
40. The Panel considered whether the Registrant was impaired by reason of a future risk of bringing the profession into disrepute or breaching a fundamental tenet of the profession. The Panel found that in the circumstances of this case and the work that the Registrant had undertaken public confidence in the profession would not be undermined if no impairment was found. The Panel concluded that in the all the circumstances of this case that a member of the public fully acquainted with all the evidence of the case would not find it necessary to make a finding of impairment or would be unduly concerned that no finding of impairment was made.

41. The Panel therefore determined in its professional judgement that the Registrant is not currently impaired, and no sanction needs to be considered.

Right of Appeal

42. Both the Registrant and UKCP have 28 days from when the written decision is served in which to exercise their right of appeal.
43. 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 dark ink, reading "D Crompton". The signature is written in a cursive style with a large initial 'D' and a trailing dot at the end.

David Crompton, Lay Chair

5 December 2025