

Council, 2 December 2015

Audit of final fitness to practise decisions 01/04/15 – 30/09/15

Executive summary and recommendations

Introduction

The attached paper is a report of the audit of final fitness to practise hearing decisions, covering the period 1 April 2015 to 31 September 2015. The purpose of the audit is to review the quality of decisions reached by fitness to practise committee panels.

Decision

The Council is invited to discuss and approve the paper. No decision is required.

Background information

- Paper for Council, 30 June 2015, (enclosure seven at <http://www.hcpc-uk.org/aboutus/council/councilmeetings/index.asp?id=712>)

Resource implications

None at this time

Financial implications

None at this time

Appendices

- Audit form for final hearing decisions

Date of paper

16 November 2015

Audit of final fitness to practise decisions 1 April 2015 – 31 September 2015

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1. Introduction

About the audit

- 1.1 This audit of final hearing decisions is based on the practice note 'Drafting fitness to practise decisions', which provides guidance to panels on the content that should be included in written decisions. Eight audits of final fitness to practise hearing decisions using this format have been carried out by the Policy and Standards Department between April 2010 and March 2015.
- 1.2 The ninth audit—documented in this paper—was carried out between 1 April 2015 and 31 September 2015, and applies the same process as the previous audits. The audit assesses Fitness to Practise panel adherence to the applicable law and to HCPC policy in particular areas. The focus of the audit is on monitoring whether panels have followed correct process and procedure including whether sufficient reasons have been given for decisions made. The audit flags areas where further policy development or consideration is required, but does not go as far as to question the decisions of the panel, as this would jeopardise the independence of panels, which operate at arm's length from the Council and the Executive.
- 1.3 The learning points from the audit will be fed back into operational policy development and into training and appraisal processes.

About this document

- 1.4 This document summarises the results of the ninth audit. The document is divided into the following sections:
 - **Section two** explains the audit process, how the data from each decision has been handled and analysed, and provides the statistics for each question of the audit.
 - **Section three** provides a summary of emerging themes identified in the results and notes areas of change or improvement since the last audit.
 - **Section four** outlines the Fitness to Practise Department's response to the learning points from the audit and makes some recommendations for future action.
 - **Appendix one** contains the full set of questions each decision was audited against.

2. Analysing the decisions

Method of recording and analysis

- 2.1 The Policy and Standards Department has been responsible for carrying out the audit. The audit process and analysis have been carried out by the department's two policy officers. The auditors' understanding of the HCPC fitness to practise procedures is based on the relevant practice notes and policy summaries.
- 2.2 This analysis includes final hearings, restoration hearings, cases of fraudulent entry to the register, full discontinuance hearings, and Article 30 review cases, reviews of conditions of practice orders and suspensions. Interim order cases and cases which were adjourned and did not reach a final decision during the audit period do not fall within the scope of the audit.

Statistical analysis

- 2.3 A total of 159 decisions were analysed as part of the audit, of which 100 (63 per cent) were final hearing cases, and 59 (37 per cent) were Article 30 reviews. 147 (93 per cent) cases were considered by conduct and competence panels, eleven (7 per cent) cases were considered by health panels and one case was considered by an investigating panel.
- 2.4 This section provides indicative statistics for the answers to the audit questions. The percentages calculated are rounded to the nearest whole number so may not always add to 100 per cent.
- 2.5 These statistics do not include individual case details but where necessary contextual explanation has been provided to clarify the way the audit question was interpreted by the auditors and the reason for particular results.

Procedural issues

- 2.6 **If the registrant was not there and unrepresented, did the panel consider the issue of proceeding in absence?**

Yes	No	Not applicable
71 (45%)	1 (1%)	87 (55%)

During the audit period, there were 87 instances where the registrant was present at the hearing or represented. There were 71 hearings where the registrant did not attend or was not represented. In each of these cases, the panel considered appropriately proceeding in the absence and / or referred to the relevant practice note.

2.7 Did any other procedural issues arise?

Yes	No
98 (62%)	61 (39%)

Procedural issues noted by the auditors included amendments to, or withdrawals of allegations; applications for hearings to be heard in private; submissions of 'no case to answer'; admission and admissibility of further evidence; applications for adjournment; discontinuance; actual or perceived bias of panel members; and disposal via consent. Further discussion of emerging issues from this question is provided in section three.

2.8 Was Legal Assessor advice disregarded?

Yes	No	Not recorded
0 (0%)	142 (89%)	17 (11%)

The vast majority of cases considered during the audit period had due regard to the advice of the relevant legal assessor. There were a number of decisions which made no mention of any advice received from the legal assessor, which is discussed further in section three.

2.9 Was the three-stage test applied?

Yes	No	Not applicable
70 (44%)	0 (0%)	89 (56%)

The auditor interpreted this question to mean cases where the three-stage test was applied explicitly. The results show that in all applicable cases, the decisions clearly demonstrated the application of the three-stage test.

There are a number of decisions where the three-stage test does not need to be applied. These cases include review hearings and consent order cases where findings of facts, grounds and impairment have been proven either in a previous hearing or through consent. In practice some review and consent order decisions demonstrated that the three stage test had been applied but for the purposes of this audit have not been considered in this section.

The table below breaks down the number of cases where the three-stage test was not applicable by the type of decision hearing.

Type of decision hearing	Number of cases (from 88)
Review hearings	58
Consent orders	17
Other	13

The 'other' category refers to cases where alternative orders were made outside the range of usual sanctions. The 13 cases referred to above resulted in the hearings and / or allegations being discontinued.

2.10 Evidence by way of mitigation considered?

Yes	No
82 (52%)	77 (48%)

All of the decisions which recorded that mitigating evidence was presented demonstrated that it was appropriately considered by the panels. Evidence by way of mitigation was not considered in 77 (48%) cases.

These cases included the 17 consent order cases where the allegations had been accepted by the registrant and discontinuance cases.¹ In the remaining 60 cases, the registrant in question had not engaged with the fitness to practise process and / or had not provided any mitigating evidence for the panel to consider, as far as the auditors could determine from the written records of these decisions.

Drafting

2.11 Is the decision written in clear and unambiguous terms (does it avoid jargon, technical, or esoteric language)?

Yes	No
158 (99%)	1 (1%)

The auditors interpreted this question to mean that the language used in the decision was appropriate to the context. In some decisions, there were occasional instances of unclear wording or terms. These included use of esoteric language or examples of technical and profession-specific language and terminology which required additional explanation for a more general audience.

2.12 Is it written in short sentences?

¹ The discontinuance cases considered mitigating evidence in more detail in the opinion of the auditors.

Yes	No
147 (93%)	12 (8%)

The auditors interpreted the phrase to mean that the sentence length was appropriate to the subject. The vast majority of decisions audited demonstrated appropriate sentence length for the subjects being discussed. However, the auditor did conclude in a minority of instances that long sentences were frequently used and could have been broken down to ensure clarity.

2.13 Is it written for the target audience?

Yes	No
159 (100%)	0 (0%)

The auditors interpreted the phrase ‘target audience’ to mean members of the public and profession. This question refers to the previous two questions about the language and construction of the written decision. All decisions in the review process were aimed appropriately at the target audience.

2.14 Was the factual background of the case included in the decision?

Yes	No
152 (96%)	7 (4%)

A small number of decisions did not include strong enough reference to the factual background of the case; these included four review hearings and two consent order hearings where the facts had been previously established. The remaining case referred to a discontinuance hearing where the background information provided in the decision was limited.

2.15 If a review hearing, does the decision make reference to previous facts?

Review hearing	Not a review hearing
59 (37%)	100 (63%)

Review hearings	
Reference to facts	No reference to facts
59 (100%)	0 (0%)

The auditors concluded that all of the review hearings made adequate reference to the previous facts established at final hearing. A minority of review hearings could have included a stronger reference to the previous facts established at a final hearing. In many instances there was no separate background section in the decision. Although some of the content was covered in the wider decision document, a separate section for the background would make the decision clearer.

2.16 Is it a stand alone decision?

Yes	No
149 (94%)	10 (6%)

The vast majority of decisions made during the audit period could be reasonably considered as ‘stand alone’ decisions. This means the decision stands alone as a document of the hearing and decision-making process; and does not need additional explanatory material to be understood or to explain the outcomes or sanction imposed. There were 10 decisions that the auditors felt could not be considered stand alone.

- The majority of these cases were reviews. Two decisions were discontinuance hearings and one was a consent order.
- Three of these reviews did not state the existing conditions of practice, so it was unclear how the Panel decided whether the registrant had met them or not. Two of these resulted in suspension.
- Three decisions did not provide adequate background information. Two of these resulted in striking off and one a caution.
- Three decisions made reference to additional information or material not provided in the decision. This included the two discontinuance hearings and one suspension order.
- Two hearings did not clearly list the allegations. One was a discontinuance hearing which resulted in the allegations being discontinued, and the other was a consent order for a caution which was approved by the Panel.

2.17 Are there adequate reasons for the decision?

Yes	No
158 (99%)	1 (1%)

In interpreting this question the auditors assessed whether the reasoning process shown in the decision was adequate given the conclusion the panel reached. In doing so the auditors did not seek to go behind the decision of the panel. All of the decisions for this audit period, apart from one, demonstrated adequate reasoning, and on the whole the panels provided appropriate and clear explanations for the decisions reached.

The decision which was not considered to have adequate reasoning was unclear about what submissions were made, only stating that there was no information that would support a conclusion that fitness to practise is not impaired. Therefore it was unclear whether the decision to strike off was justified.

2.18 Conclusions on submissions (adjudged, facts, admissibility)?

Yes	No
158 (99%)	1 (1%)

As above, all decisions made during the audit period apart from one, made adequate conclusions on the information presented during the hearing.

This was the same decision that was not considered to have adequate reasoning due to the lack of conclusions on submissions.

2.19 Does it clearly set out the finding of facts (including disputed and undisputed facts and if disputed, why the decision was made)?

Yes	No
141 (89%)	18 (11%)

Most audit decisions clearly set out the finding of facts. The vast majority of the exceptions were consent orders. Consent orders do not usually include findings of facts as they have been admitted in total by the registrant in question. The two remaining hearings included one discontinuance hearing and one in which a half time submission of not well founded was successfully made.

2.20 What standards were referred to?

72 (45%) of decisions referenced standards and the following table sets out which standards were referred to in this audit period. 26 decisions referred to more than one set of standards; therefore the total number of references is greater than the number of decisions in this category.

Standards referred to	Number of decisions where standards were referred to
Standards of conduct, performance, and ethics ²	45
Standards of proficiency	38
Standards of another organisation (professional body etc)	16

Other standards or guidelines referred to by panels were:

- General Social Care Council's (GSCC) Code of Conduct or standards for social workers (13)
- HCPC's returning to practice requirements (3)
- Three references to specific guidelines in place by employers

2.21 Did a panel impose a sanction which required reference to standards?

FTP panel imposed relevant sanction	FTP panel did not impose relevant sanction
100 (63%)	59 (37%)

There are a number of decisions where the auditors concluded that it would not be necessary for the panel or decision to refer to a particular set of standards. These include: discontinuing an allegation; allegations which are not well founded; the panel not issuing another sanction or revoking an existing sanction at review stage.

2.22 Did decisions with a relevant sanction refer to the standards?

² A few decisions just referenced standards of professional conduct and ethics but not explicitly the HCPC's standards of conduct, performance and ethics. However, where relevant these have been included in this figure.

Yes	No
47 (47%)	53 (53%)

There were slightly more decisions with a relevant sanction that did not refer to the standards, than did. These sanctions included caution, conditions, suspension and strike-off orders. The majority of consent orders (16) did not refer to any standards in the decision.

Order

2.23 What was the panel's decision?

Sanction	Number of orders made (from 159)
Striking off	21 (13%)
Suspension	32 (20%)
Conditions	18 (11%)
Caution	13 (8%)
Mediation	0 (0%)
Not well founded	28 (18%)
No further action	0 (0%)
Consent order approved	16 (10%)
Consent order refused	3 (2%)
Discontinuance in full	11 (7%)
Other	17 (11%)

The vast majority of the consent orders audited in this period resulted in removal from the Register. The remaining four consent orders imposed either a caution or conditions of practice on the registrant in question.

The 'other' category refers to cases where alternative orders were made outside the range of the usual sanctions. These included hearing panels which either revoked an existing order or made no further order upon the expiry of the current order. One order was made to remove an incorrect entry from the register.

2.24 How long was the sanction imposed for?

This question applies only to suspension, condition of practice, and caution orders. This section sets out the lengths of these sanctions in this period, relevant to the type of sanction order made.

As the length of sanction that can be imposed varies between the different types of sanctions, the relevant sections of the indicative sanctions policy has been included alongside the relevant statistics.

Caution

The indicative sanctions policy states that *“a caution order must be for a specified period of between one year and five years...In order to ensure that a fair and consistent approach is adopted, panels should regard a period of three years as the ‘benchmark’ for a caution order. However, as panels must consider sanctions in ascending order, the starting point for a caution is one year and a panel should only impose a caution for a longer period if the facts of the case make it appropriate to do so.”*

Length of caution order	Number of orders (total 14)*
12 months/1 year	4
2 years	1
3 years	5
5 years	4

*This number includes one consent order in which a caution order was agreed by the panel.

Panels seemed to be consistent in their application of the guidance in the indicative sanctions policy, with the average length of a caution order being approximately three years.

Conditions

The indicative sanctions policy states that *“a conditions of practice order must be a specified period not exceeding three years. [...] Equally, in some cases it will be appropriate to impose a single condition for a relatively short period of time to address a specific concern...”*

Length of conditions	Number of orders (total 19)*
6 months	4
9 months	1

12 months/1 year	5
14 months	1
18 months	4
2 years	2
3 years	2

*This number includes one consent order in which a conditions of practice order was decided by the panel through consent.

The length of conditions of practice orders imposed seemed to be consistent with the guidance in the indicative sanctions policy. The longer conditions of practice orders were imposed on registrants with a greater need for support to reach full competence, and shorter periods imposed where there were fewer issues to be addressed.

Four of these orders were to vary existing conditions. One conditions of practice order was made during a review to replace a suspension order.

Suspension

The indicative sanctions policy states that *“a suspension order must be for a specified period not exceeding one year. [...] Suspension for short periods of time (i.e less than a year) is a sanction which panels should generally not use...however, short term suspension may be appropriate where any lesser sanction would be unlikely to provide adequate public protection, undermine public confidence or be unlikely to have a suitable deterrent effect upon the registrant in question and the profession at large.”*

Length of suspension	Number of orders (total 32)
3 months	1
4 months	1
6 months	11
9 months	3
12 months/1 year	16

There was an even split between the number of suspension orders imposed for a year or less than a year. The 16 cases where the panel imposed a period of suspension shorter than a year seems generally consistent with the guidance, as panels only imposed such orders where they had a specific reason to do so.

- The three and four month suspension orders were made at review hearings and the reasons for the shorter suspension period were adequately addressed in the decisions.
- Seven of the six month suspension orders were made during review hearings to extend existing suspension orders. The decisions provided clear reasoning as to why this period of suspension was deemed appropriate and what the expectations would be for the registrant prior to a review of the order. Four of the six month suspension orders referred to final hearings. The panels provided clear rationale for the shorter suspension orders which included allowing additional time for the registrants in question to reflect on and fully address the underlying issues which led to their fitness to practise being impaired.
- The three nine month suspension orders were considered appropriate by the panel. One of these orders related to extending existing suspension orders. One nine month suspension order related to a final hearing. The other suspension order replaced existing conditions of practice which the Panel felt had not been met. This period was considered appropriate for the registrant to demonstrate further insight and to provide additional information. This included undertaking relevant training, providing written reflections and testimonials.

2.25 Does the order accord with sanction policy?

Applicable decisions	Not applicable
100 (63%)	59 (37%)

Applicable decisions	
Accord with policy	Not accord with policy
100 (100%)	0 (0%)

The auditors found that all applicable cases appropriately accorded with the indicative sanctions policy. Only orders that applied a sanction are included in this category, including consent orders and removal orders. This question does not include decisions where no sanctions were imposed, i.e. decisions which were not well founded / no case to answer, where the case was discontinued or the panel decided that no further action was necessary, or transferred the case to a different panel.

2.26 Does it state the operative date of the order?

Applicable decisions	Not applicable
113 (71%)	46 (29%)

Applicable decisions	
State operative date	No operative date
111 (98%)	2 (2%)

This category includes all sanction orders, restoration orders and orders of 'no further action' where in reviewing a sanction order the panel decided that the registrant's fitness to practise was no longer impaired.

Two decisions did not record an operative date in the order and this consisted of the omission of 'from the date this order comes into effect' or 'with immediate effect'.

2.27 Does it state the end date of the order?

Applicable decisions	Not applicable
67 (42%)	92 (58%)

Applicable decisions	
State end date	No end date
67 (100%)	0 (0%)

All of the cases which imposed a sanction able to expire stated the end date of the order. This category includes suspension, conditions of practice and caution orders. Not applicable to this section were decisions that did not impose a sanction order, discontinuance orders, and consent orders for removal from the Register and orders to strike off which do not have end dates.

2.28 Conditions orders

Conditions were imposed in 19 cases; this number includes one consent order in which a conditions of practice order was agreed by the panel. The following tables analyse the conditions set and whether they accord with the guidance in the indicative sanctions policy.

Are they realistic (is the registrant able to comply)?

Yes	No
19 (100%)	0 (0%)

All of the conditions set during this audit period were sufficiently realistic.

Are they verifiable (are dates on which information is due specific and clear)?

Yes	No
19 (100%)	0 (0%)

The auditors found that all conditions imposed were verifiable and provided specific and clear information about what evidence would be required to meet the conditions and when it would be required.

Are they imposed on anyone other than the registrant?

Yes	No
0 (0%)	19 (100%)

The auditors interpreted this question to refer to decisions where persons other than the registrant were directly required by the panel to carry out an action to enable the registrant to meet conditions. Where the registrant was responsible for organising other people to carry out certain actions, the auditors understood that the conditions were only imposed on the registrant which could include formulating a personal development plan in conjunction with another professional.

Based on this interpretation, all of the conditions set in this period were imposed only on the registrants in question. Though many conditions of practice orders imposed a supervisory requirement they did not refer to supervision by any named person and stipulated that the registrant needed to organise these arrangements.

3. Emerging themes

This section discusses the emerging themes from specific audit questions, and where necessary provides more detailed results to reveal trends and potential areas for further consideration.

Procedural issues

- 3.1 There was a wide range of procedural issues considered by panels during the period of this audit and the following table sets out the number of instances different types of procedural issues occurred. Some cases considered a number of different procedural issues, so the total number of issues raised does not directly correspond to the total number of hearings (98) where procedural issues were considered.

Procedural issues	Number of instances
Request for hearing to be held in private	40
Amendments, corrections, withdrawal of allegations	47
Application for full or partial discontinuance of allegations ³	4
Application of no case to answer	5
Application for adjournment of hearing	6
Joinder	1
Other	18

- 3.2 Most procedural issues were relatively straightforward, such as minor amendments to allegations and applications for hearings to be heard in private.

³ The auditors have only recorded discontinuance as a procedural issue when it is considered separately or referred to in a relevant consent order.

The 'other' category relates to cases where more unusual procedural issues occurred, as summarised below.

- Where the panel considered the possibility of actual or perceived bias due to a panel member or the legal assessor's prior involvement or connection with an organisation or individual involved in the case.
- In cases panels considered the admissibility of particular pieces of evidence (on occasion this consideration was more implicit than explicit). This includes instances where an application was made that some evidence was inadmissible, and cases where new evidence was put forward and the panel considered whether it should be included.
- Where the panel considered special measures in relation to hearing evidence or representation at a hearing (on occasion this consideration was more implicit than explicit). Six cases related to hearing evidence or participating in the hearing via telephone; and one case related to hearing evidence or participating in the hearing via video link.
- One decision related to a combined case for three registrants. One of the registrants was found to be currently impaired, however the decision did not include the sanction or order made by the panel.

Legal advice

- 3.5 The majority of decisions stated that the panel accepted the advice of the legal assessor, and often provided some detail as to the advice they received.
- 3.6 However, 17 decisions (11%) in this audit period did not include any reference to the legal assessor. This is an improvement of 5 per cent from the previous audit.
- 3.7 Previous audits have referred to the difficulty in assessing whether legal advice is disregarded, as a number of decisions made no reference to the legal assessor, or any advice the panel may have received from them.

Considering sanctions in ascending order

- 3.8 The auditors have noticed that not all panels are considering the full range of sanctions in ascending order (9 cases). The most frequent omissions are for mediation and no further action. Although the auditor acknowledges that mediation is not considered a formal sanction.

Conviction and caution allegations

- 3.9 The auditors reviewed seven decisions which referred to a panel handling conviction and caution allegations. There is a separate practice note for handling such allegations by panels.
- 3.10 Two of these decisions did not provide a summary of the three stage test at the start of the decision. It was evident that the panels in question considered the facts and grounds (as a result of a caution or conviction being received by a registrant) at a single stage; before moving on to consider impairment separately. However, it would be clearer to a more general audience if all such decisions provided a summary of the three stage test at the start of the document.

Drafting

- 3.11 The drafting of decisions across the audit period was often of high quality and the majority of decisions were appropriately structured and written. The following provides further comment on drafting issues.

3.12 Use of language

Most decisions used simple language appropriate to the context. Some decisions included allegations which referred to technical skill or complex concepts, and in such decisions the auditors judged that it was appropriate for the issues to be discussed using the appropriate technical terms which were generally explained as necessary.

The auditor concluded that one decision made use of unclear language, by referring to multiple witnesses as 'person' which may be misleading as to the role of individuals in the decision.

3.13 Proof-reading and editing

The standard of proof reading and editing of decisions being released as final versions has been noted in previous audit reports. The last audit identified 63% of decisions with minor spelling, grammar, and formatting errors evident in the final decisions for that period.

However, this audit found that 59% of decisions (94) in this period contained some minor drafting errors. This marks a decrease of 4% from the previous audit.

Procedural issues

- 3.14 The auditor observed that the majority of procedural issues were recorded as part of preliminary matters at the start of the decision. However, in some instances the procedural issues were recorded later in the decision. Similar to the recommendation made in earlier audits, it would be helpful for future audit purposes if as many procedural issues as possible were recorded under preliminary matters at the start of the decision.

4. Learning points and recommendations

4.1 The Fitness to Practise Department made the following comments in relation to the report:

- The report continues to highlight the wide range of procedural issues that are dealt with by panels. Where possible, procedural issues will be dealt with by way of a preliminary hearing, in order to prevent any unnecessary delays to the start of final hearings. We will shortly be evaluating the 12 month pilot for the use of pre-hearing teleconferences which has been used to help identify preliminary issues in advance of the final hearing.
- We note that this audit has reported an improvement in the number of minor drafting errors, we hope that this improvement will continue. We have discussed the last audit findings at the Panel Chair and Legal Assessor review days which took place in June/July 2015. During these sessions some further process improvements were also identified.
- In order to improve the consistency in the formatting, language and appearance of decisions, an FTP decision formatting guide has been created to aid both Hearings Officers and panellists with the proof reading of decisions. In addition, all new starters continue to attend an external proof reading course as part of their induction.
- It is noted that in a small number of cases, explicit reference is not being made to the advice of the Legal Assessor. Since April, this has been covered at both the Legal Assessor review day and at each panel refresher training session.
- In addition, we continue to reinforce to Panel Chairs and Legal Assessors that decisions should be stand-alone and contain sufficient factual background to the case.
- A copy of the last audit report was also included in HCPC's Partner Newsletter for July 2015.

5. Appendix

Audit Form Final/Review Hearing Decisions

Case details	
Case name	
Case reference	FTP
Panel type	Conduct and Competence/ Health/Investigating/Review
Hearing date	
Legal Assessor	
Panel Chair	

1. Procedural issues

If the registrant was not there and unrepresented, did panel consider issue of proceeding in absence?	Yes/No/Registrant or representative attended
Did any other procedural issues arise?	Yes/No/Comments
Was Legal Assessor advice disregarded?	Yes/No/Comments
Was the three stage test applied?	Yes/No/Comments
Evidence by way of mitigation considered	

2. Drafting

Is decision written in clear and unambiguous terms (does it avoid jargon, technical, esoteric language)?	Yes/No/Comments
Is it written in short sentences?	Yes/No/Comments
Is it written of target audience?	Yes/No/Comments
Was the factual background of the case included in the decision?	Yes/No/Comments
If review hearing, does decision make reference to previous facts?	Yes/No/Comments/Not review hearing

Is it a stand alone decision?	Yes/No/Comments
Are there adequate reasons for the decision?	Yes/No/Comments
Conclusions on submissions (adjourned, facts, admissibility)	Yes/No/Comments
Does it clearly set out the finding of facts (including disputed and undisputed facts and if disputed, why decision was made)	Yes/No/Comments

3. Order

What was the panel's decision?	Not well founded/ no further action/ mediation/ caution/ conditions/ suspension/ striking off
How long was the sanction imposed for?	
Does the order accord with sanction policy?	Yes/No/Comments
Does it state the operative date of the order?	Yes/No/Comments
Does it state the end date of the order?	Yes/No/Comments
If conditions imposed:	
- are they realistic (is the registrant able to comply)?	Yes/No/Comments
- are they verifiable (are dates on which information is due specific and clear)?	Yes/No/Comments
- are they imposed on anyone other than the registrant?	Yes/No/Comments

4. Policy issues

Are there any emerging policy issues?

Audited by:

Date: