

**BEFORE THE FITNESS TO PRACTISE COMMITTEE
OF THE GENERAL OPTICAL COUNCIL**

GENERAL OPTICAL COUNCIL

F(22)03

AND

NASEEM SULEMAN (SD-7278)

**DETERMINATION OF A SUBSTANTIVE HEARING
03 – 12 JUNE 2024**

Committee Members:	Mr Graham White (Chair) Mr Ben Summerskill (Lay) Mr Nigel Pilkington (Lay) Ms Tracey Fellows (Dispensing Optician) Ms Gillian Perry (Dispensing Optician)
Legal adviser:	Ms Jennifer Ferrario
GOC Presenting Officer:	Ms Vida Simpeh, Counsel
Registrant present/represented:	No and not represented
Registrant representative:	N/A
Hearings Officer:	Ms Humera Asif
Facts found proved:	1, 2, 3 ,4, 5 ,6, 7a, 7b, 8a ,8b, 8c, 9a, 9b, 9c
Facts not found proved:	None
Misconduct:	Found
Impairment:	Found
Sanction:	Erasure
Immediate order:	Yes

Proof of service and Proceeding in the absence of the Registrant

1. The Committee heard an application from Ms Simpeh, Counsel for the General Optical Council ('the Council') for the matter to proceed in the Registrant's absence. Ms Simpeh submitted that the notice of hearing documents had been served in accordance with Section 23A of the Opticians Act 1989 and rule 61 of the Fitness to Practise Rules 2013 ('the Rules') and that the Registrant had confirmed that she consented to receiving correspondence by email on 17 January 2022. Ms Simpeh submitted that effective service had been carried out.

2. Ms Simpeh went on to make an application to proceed with the hearing in the absence of the Registrant. Ms Simpeh submitted that the Committee should consider the criteria laid down in the leading case authorities and take into account that the Registrant had not engaged with the fitness to practise process since January 2022; she had not requested an adjournment to enable her to attend; the allegations dated back to 2019 and witnesses had been warned to give evidence. Ms Simpeh said that any disadvantage to the Registrant in choosing not to attend is outweighed by the Council's responsibility to bring the matter to a conclusion as expeditiously as possible.

3. The Committee asked Ms Simpeh about the preliminary application in the Council's skeleton regarding an amendment of the allegations. Ms Simpeh told the Committee that the Council had informed the Registrant of the application to amend in September 2022 by email. Ms Simpeh went on to say that a further email had been sent to the Registrant on 3 June 2024 at 10.24 am to notify her that the Council intended to make a hearsay application to introduce the evidence of Person A as the witness had said that she would not attend the hearing in person. The email invited the Registrant to raise any response to the proposed application by 5 June 2024.

4. The Committee accepted the advice of the Legal Adviser which was that the Committee should first consider whether service of the notice of hearing had been effective and in accordance with the Rules. The Legal Adviser advised the Committee to have consideration for rule 34(2) and satisfy itself that notice of the hearing had been sent to the Registrant at least 28 days before the hearing. The Legal Adviser reminded the Committee that the notice of hearing had been sent on 1 March 2024 by email to the email address held by the Council on its register and that

on 17 January 2022, the Registrant had confirmed personally that she was prepared to accept correspondence from the Council by email to that address.

5. The Legal Adviser advised the Committee about the factors that it should take into account when considering the application to proceed in the Registrant's absence. This included reference to rule 22 of the Rules and the cases of ***R v Jones [2002] UKHL 5*** and ***The General Medical Council v Adeogba [2016] Civ 162***. The Legal Adviser advised the Committee that if having determined that all reasonable efforts had been taken by the Council to serve notice of the hearing, it should balance any disadvantage caused to the Registrant in choosing not to attend with the Regulator's overriding duty to bring the matter to a fair and expeditious conclusion. The Legal Adviser invited the Committee to consider whether it was able to arrive at a decision prior to the 5 June 2024 having regard to the content of the email sent by the Council to the Registrant about the hearsay application.

6. The Committee first considered whether it was fair to the Registrant to decide whether to proceed in her absence, having regard to the email sent by the Council to the Registrant on 3 June 2024 at 10.24am. The email from the Council read as follows:

'Dear Ms Suleman,

I write further to my email dated 9 My 2024, in which I provided a copy of the documents bundle the Council intend to rely upon at the hearing. Included within that bundle was the witness evidence of Person A and an email chain at tabs 6 and 13 respectively.

Person A will not be attending the hearing this week to give evidence and I am emailing you to give notice of the Council's intention to make an application to rely upon her evidence as hearsay. The application is pursuant to Rule 40 of the Fitness to practise Rules, which sets out what evidence the Committee may hear.

Please notify us as soon as possible and by no later than Wednesday 5 June 2024, if you have any objections. You will note that the hearing is due to start today and the Council will be making an application to proceed in your absence.'

7. The Committee noted that the Registrant had been informed in the morning of the 3 June 2024 of Council's intention to make the hearsay application and determined that the application may impact on whether she chooses to engage with the hearing. The Committee decided that in regard to the circumstances that its decision about proceeding in absence should wait until the 5 June 2024. The Committee in the hearing asked Ms Simpeh to arrange for the Council to send a further email to the Registrant, inviting her to respond to the hearsay application by 12 noon on the 5 June 2024. The Committee informed Ms Simpeh that it would arrive at a decision

regarding the application to proceed in absence once that deadline had passed. The Committee adjourned the hearing until 12 noon on the 5 June 2024.

8. When the hearing resumed at 12 noon on the 5 June 2024, Ms Simpeh confirmed that there had been no response from the Registrant to either of the emails sent to the Registrant by the Council on 3 June 2024. The Committee was informed that a telephone call was made to the Registrant on the 3 June 2024 by a Council investigating officer to the Registrant. A note of the telephone call was prepared which said;

'Call to registrant, I asked if this was Naseem Suleman and she confirmed it was and then proceeded to ask who she was speaking to. I gave my name and explained I was calling from the General Optical Council.

The registrant then proceeded to say "hello?", I also said "hello" and registrant repeated "hello", I asked if she could hear me, and then the line went silent however the call was still engaged. I hung up and called the registrant back.

The registrant didn't answer the phone when I called back. I left a voicemail advising that it was important that she provide a response to Person B's email as soon as possible. I also advised that I was available should she have any queries'.

9. The Committee proceeded to deliberate about the application to proceed in the Registrant's absence. First it considered whether there had been proper service. The Committee had regard to the service bundle and the submissions from Ms Simpeh and decided that it was satisfied that all reasonable efforts had been made to notify the Registrant of the hearing, and that notice had been served in accordance with the Rules.

10. The Committee went on to consider whether to proceed in the absence of the Registrant and in doing so had regard for the lack of engagement by the Registrant with the Council since January 2022. It noted that the Council had sent several emails to the Registrant since January 2022 and none had been shown as undelivered. The Committee was satisfied that the Registrant was fully aware of the hearing and had deliberately chosen not to attend. The Committee further noted that there had been no request from the Registrant to adjourn the hearing to enable her to attend on another date and an adjournment would serve no useful purpose.

11. The Committee determined that there may be a disadvantage to the Registrant in proceeding in her absence. The Committee balanced this with the lack of engagement by the Registrant and the Council's duty to bring the case to an expeditious hearing particularly since these matters first arose in 2019. The Committee decided that in the circumstances the Council had taken all reasonable efforts to notify the Registrant of the hearing, there was no reason provided by the

Registrant for her absence, and it is in the public interest to proceed with the hearing. The Committee agreed to the Council's application to proceed in the absence of the Registrant.

Application to amend the Allegation

12. Ms Simpeh made an application on behalf of the Council to amend the allegations. She referred the Committee to the hearing bundle and to the Council's skeleton and took the Committee to the proposed amendments which were as follows,

(1) On or around 8 September 2019 at *[redacted]* Practice A, you carried out restricted activities as a dispensing optician whilst unregistered and/or unsupervised, contrary to the Opticians Act 1989 as amended in 2005, Part 4 Subsection 27 (1) (b) section 25(1) and/or 27(1) of the Opticians Act 1989; to;

a. Patient 1;

(2) On or around 15 September 2019 at *[redacted]* Practice A, you carried out restricted activities as a dispensing optician whilst unregistered and/or unsupervised, contrary to the Opticians Act 1989 as amended in 2005, Part 4 Subsection 27 (1) (b) to section 25(1) and/or 27(1) of the Opticians Act 1989, to;

a. Patient 2; and/or

b. Patient 3; and/or

c. Patient 4; and/or

(3) On or around 14 September 2019 at *[redacted]* Practice B you carried out restricted activities as a dispensing optician whilst unregistered and/or unsupervised to Patient 7, contrary to the Opticians Act 1989 as amended in 2005, Part 4 Subsection 27 (1) (b) section 25(1) and/or 27(1) of the Opticians Act 1989

(4) On or around 8 September 2019, you provided *[redacted]* Practice A with the a false registration number, 'D-19364' despite knowing that this was not your temporary registration number given to you by the GOC

(5) On or around 14 September 2019, you provided *[redacted]* Practice B with the registration number 'D-17337' despite knowing that this was not your temporary registration number given to you by the GOC

5-6. (6) On or around 20 September 2019, you stated via electronic communication with Colleague A that you had "just qualified 2 weeks ago"

~~6.7.~~ (7) Your conduct at (4) and/or (5) above was inappropriate in that:

a. you knew that you had given [redacted] Practice A a different registration number in an attempt to conceal that you were an unregistered dispensing optician;

b. you knew that you had given [redacted] Practice A a different registration number in an attempt to conceal that you were an unregistered dispensing optician

~~7.8.~~ (8) Your conduct at (4) and/or (5) and/or (6) above was misleading in that:

a. you knew that you had given [redacted] Practice A a different registration number in an attempt to conceal that you were an unregistered dispensing optician;

b. you knew that you had given [redacted] Practice B a different registration number in an attempt to conceal that you were an unregistered dispensing optician;

c. you knew that you had not fully qualified as a Dispensing Optician;

~~8.9.~~ (9) Your conduct at (4) and/or (5) and/or 6 above was dishonest in that:

a. you attempted to deceive [redacted] Practice A by submitting a different false registration number to appear as a fully qualified Dispensing Optician when you were not;

b. you attempted to deceive [redacted] Practice B by submitting a different registration number to appear as a fully qualified Dispensing Optician when you were not;

c. you attempted to deceive Colleague A by suggesting you were a fully qualified Dispensing Optician, when you were not;

And by virtue of the facts set out above, your fitness to undertake training is impaired by reason of misconduct.

13. Ms Simpeh submitted that the proposed amendments serve to 'properly particularise' the particulars of the allegation and 'properly reflect' the evidence. Ms Simpeh said that the amendments are based on the same set of facts and evidence that was disclosed to the Registrant on 8 January 2024. She told the Committee that the Registrant had been provided with notice of the intention to make the application to amend the allegation, by email on 6 September 2022. Ms Simpeh provided a copy of that email to the Committee.

14. The Committee accepted the advice of the Legal Adviser. The Committee was advised to consider rule 46(20) of the Rules. The Legal Adviser said that the key issue is fairness to the Registrant and the Committee ought to decide whether the proposed amendments are minor or significant and if the latter, whether allowing the amendment would be unfair to the Registrant. The Legal Adviser referred to the cases of ***The PSA v The HCPC & Doree [2017]*** and ***Ahmedsowida v GMC [2021]***. She advised that if the Committee is satisfied that the Registrant would be aware of the case that they have to meet if the amendments were permitted, no injustice ought to be caused to the Registrant in allowing the application.

15. The Legal Adviser also referred to the discretion provided to the Committee by rule 46(20) of the Rules to amend the particulars to the allegation of their own volition. She advised that the Committee was under a duty to be proactive in making sure that the case before it was properly presented. This included ensuring that the allegation adequately reflected the alleged conduct as set out in the cases of ***Ruscillo v Council for the Regulation of Health Care Professionals [2004]*** ***EWCA Civ 1356*** and ***The PSA v The NMC and Macleod [2014] EWHC 4354 (Admin)***.

16. The Committee considered the proposed amendments and Ms Simpeh's submissions and determined that the amendments were minor and did not affect the nature of the allegations that had been communicated to the Registrant. They reflected more precisely the evidence served. The Committee was satisfied that the Registrant had had sufficient notice of the application and granted the Council's application. The Committee upon considering the proposed amendments decided of its own volition to re-frame paragraph 3 for the purpose of consistency with other Particulars of the allegation and paragraph 5, to reflect the evidence.

17. The Committee therefore granted the Council's application to amend the particulars of the allegation subject to the re-framing of Particulars 3 and 5 which were amended in line with the Committee's decision to introduce its own amendments.

ALLEGATION (AS AMENDED)

The Council alleges that you, Miss Naseem Suleman (SD-7278), a registered student dispensing optician:

(1) On or around 8 September 2019 at [redacted] Practice A, you carried out restricted activities as a dispensing optician whilst unregistered and/or unsupervised, contrary to the Opticians Act 1989 as amended in 2005, Part 4 Subsection 27 (1) (b) to;

a. Patient 1;

(2) On or around 15 September 2019 at [redacted] Practice A, you carried out restricted activities as a dispensing optician whilst unregistered and/or unsupervised, contrary to the Opticians Act 1989 as amended in 2005, Part 4 Subsection 27 (1) (b), to;

- a. Patient 2; and/or
- b. Patient 3; and/or
- c. Patient 4; and/or

(3) On or around 14 September 2019 at [redacted] Practice B, you carried out restricted activities as a dispensing optician whilst unregistered and/or unsupervised, contrary to the Opticians Act 1989 as amended in 2005, Part 4 Subsection 27 (1) (b) to;

a. Patient 7

(4) On or around 8 September 2019, you provided [redacted] Practice A with a false registration number, 'D-19364'

(5) On or around 14 September 2019, you provided [redacted] Practice B with the registration number 'D-17337' which was not yours.

(6) On or around 20 September 2019, you stated via electronic communication with Colleague A that you had "just qualified 2 weeks ago"

(7) Your conduct at (4) and/or (5) above was inappropriate in that:

- a. you knew that you had given [redacted] Practice A a different registration number in an attempt to conceal that you were an unregistered dispensing optician;
- b. you knew that you had given [redacted] Practice B a different registration number in an attempt to conceal that you were an unregistered dispensing optician

(8) Your conduct at (4) and/or (5) and/or (6) above was misleading in that:

- a. you knew that you had given [redacted] Practice A a different registration number in an attempt to conceal that you were an unregistered dispensing optician;

- b. *you knew that you had given [redacted] Practice B a different registration number in an attempt to conceal that you were an unregistered dispensing optician;*
- c. *you knew that you had not fully qualified as a Dispensing Optician;*

(9) Your conduct at (4) and/or (5) and/or 6 above was dishonest in that:

- a. *you attempted to deceive [redacted] Practice A by submitting a different false registration number to appear as a fully qualified Dispensing Optician when you were not;*
- b. *you attempted to deceive [redacted] Practice B by submitting a different registration number to appear as a fully qualified Dispensing Optician when you were not;*
- c. *you attempted to deceive Colleague A by suggesting you were a fully qualified Dispensing Optician, when you were not;*

And by virtue of the facts set out above, your fitness to undertake training is impaired by reason of misconduct.

Application to admit Hearsay Evidence

18. Ms Simpeh on behalf of the Council applied to admit the evidence of [redacted] Person A as hearsay evidence. She referred the Committee to the Council's skeleton argument in support of the application and said that the evidence is relevant and fair in line with rule 40(1) of the Rules. Ms Simpeh submitted that all reasonable efforts had been attempted to secure [redacted] Person A's attendance at the hearing but she has not engaged since 28 May 2024 when she spoke on the telephone with a Council representative. During this telephone conversation she said that she was no longer willing to provide evidence in person as she has caring responsibilities. Ms Simpeh submitted that the evidence is not sole and decisive, and her evidence may be regarded as reliable because evidence from other witnesses corroborates it.

19. The Committee accepted the advice of the Legal Adviser. The Committee was advised to have regard to the definition of hearsay evidence as provided for in civil proceedings which is 'a statement made otherwise than by a person while giving oral evidence, which is tendered as evidence of the matters stated.' The Legal Adviser said that the fundamental issues for the Committee to consider were relevance and fairness. She advised that there is a two-stage test to adopt, first the Committee should decide at this stage whether to admit the evidence. If it does so, the Committee should decide once it has heard all the evidence how much weight, if any, to attach to [redacted] Person A's witness statement.

20. The Legal Adviser referred to the cases of ***R (on the application of Bonhoeffer) v GMC [2011] EWHC 1585*** and ***Thorneycroft v NMC [2014] EWHC 1565*** and advised that the Committee should give consideration to the following;

- Whether the statement of **[redacted]** Person A is the sole or decisive evidence in support of the allegation
- Whether there has been a challenge to date of her witness evidence
- Whether there has been a suggestion that **[redacted]** Person A had a reason to fabricate her witness evidence
- The seriousness of the factual allegations and the impact any adverse findings may have for the Registrant
- Whether there is a good reason for **[redacted]** Person A's non-attendance
- Whether the Registrant had prior notice of the application to read the witness statement.

21. The Legal Adviser also referred to the case of ***Mansaray v NMC [2023] EWHC 730 (Admin)*** which provides that the lack of a good reason for the non-attendance of a witness *'is an important factor. However, the absence of a good reason does not automatically result in the exclusion of the evidence. Where such evidence is the sole or decisive evidence in relation to the charges, the decision whether or not to admit it requires a panel to make careful assessment, weighing up the competing factors. To do so, the panel must consider the issues in the case, the other evidence which is to be called and the potential consequences of admitting the evidence. The panel must be satisfied that the evidence is demonstrably reliable or alternatively, that there will be some means of testing its reliability.'*

22. The Committee noted rule 40(1) of the Rules which provides:

'The Fitness to Practise Committee may admit any evidence it considers fair and relevant to the case before it, whether or not such evidence would be admissible in a court of law.'

23. In reaching its decision, the Committee therefore considered whether the witness statement of **[redacted]** Person A was relevant and whether it would be fair to admit it as hearsay evidence. The Committee carefully considered the cases referred to by the Legal Adviser and applied the principles derived from them to its determination of this application.

24. The Committee considered the evidence of **[redacted]** Person A as contained in her witness statement and decided that the evidence is relevant. The Committee

went on to consider whether it would be fair to admit it and reminded itself that hearsay evidence should not be admitted as a matter of routine.

25. It was noted by the Committee that the proposed hearsay evidence is a formal witness statement dated 29 January 2021, signed by [redacted] Person A and contains a paragraph to say that the content is true. The Committee also noted that whilst [redacted] Person A had initially indicated that she would be prepared to attend the hearing, she had not heard from the Council for a considerable period of time during the investigation and had subsequently declined to attend. The Committee determined that the Council had not taken all reasonable steps to secure her attendance. However this in itself did not render the admission of the evidence as unfair. The Committee determined that there is other contemporaneous evidence that corroborated the evidence of [redacted] Person A and that her evidence was not sole or decisive. The Committee further determined that there is no indication that [redacted] Person A had fabricated her evidence.

26. The Committee, in considering unfairness, determined that whilst there may be some disadvantage to the Registrant in admitting the evidence; she had chosen not to attend the hearing. The Committee concluded that if the Registrant had disagreed with [redacted] Person A's evidence, she could have attended the hearing to challenge it. The Committee recognised that the allegations are serious and the potential impact an adverse finding might have on the Registrant's career and balanced this with the decision of the Registrant not to engage with the hearing.

27. The Committee noted that if it admits the hearsay evidence, it is not obliged to attach any weight to it and that it will exercise its judgement in this regard once it has heard the other evidence. In conclusion, having carefully analysed the relevant issues and factors, the Committee decided that it would not be unfair to the Registrant to admit the written evidence of [redacted] Person A. The Committee agreed to the Council's application.

Background to the allegations

28. The Registrant is a student Dispensing Optician and was entered onto the student dispensing register on the 14 January 2015.

29. In September 2019, the Registrant responded to an advert placed by [redacted] Practice A and [redacted] Practice B for the role of Locum Dispensing Optician/Dispensing Assistant. In her response, she described herself as a Locum Dispensing Optician and was subsequently taken on as such.

30. Upon attending for her first day of work on the 8 September 2019 at [redacted] Practice A, the Registrant provided a GOC registration number to the store manager and showed him an email from the Association of British Dispensing Opticians ('ABDO') which confirmed that the Registrant was a registered Dispensing Optician. The Registrant worked on that day, carrying out regulated and unsupervised activities, including supplying spectacles to a child under 16 years of age.

31. The Registrant next worked on the 14 September 2019, at the [redacted] Practice B store. She provided a different GOC registration number to the store manager. She worked that day as a Dispensing Optician and supervised a colleague when a child under the age of 16 collected their spectacles. On the 15 September 2019, the Registrant worked at [redacted] Practice A during which time she dealt with the collection of spectacles for two children under the age of 16 and authorised the collection of spectacles to a child under the age of 16.

32. On 20 September 2019, [redacted] Person A, a Dispensing Optician and Retail Director for the [redacted] Practice A and [redacted] Practice B contacted the Registrant to say that the GOC number that the Registrant had provided did not return her name. The Registrant said that this was because she had been provided with a temporary registration number as she had recently qualified.

33. The Registrant was due to work on the 22 September 2019 but cancelled her shift as she said that she was ill.

34. On 24 September 2019, [redacted] Person A spoke to the Council and was informed that the Registrant was a student Dispensing Optician. [redacted] Person A sent a message to the Registrant via WhatsApp to say that she had contacted the Council and that, as the Registrant was a student Dispensing Optician, she should not return to work until matters regarding her registration had been resolved.

35. The matter was referred to the Council and on 10 October 2019, the Council sent a letter to the Registrant to notify her that a concern had been received about her conduct.

Findings in relation to the facts

36. The Committee heard evidence from the following persons,

[redacted] Witness A

[redacted] Witness B

[redacted] Witness C

[redacted] Witness D

[redacted] Witness E

Richard Booth

Witness A

37. Witness A told the Committee that the content of her witness statement dated 2 September 2020 contained in the hearing bundle is true to the best of her knowledge and belief and she asked the Committee to adopt it as her evidence. She said that she was still employed by the Council as an Investigation Officer and described her role as creating investigation plans and gathering evidence with assistance from the legal team, to progress fitness to practise investigations.

38. In her statement Witness A confirmed that the Registrant had provided an indemnity insurance certificate in an email dated 8 November 2019. The Committee has seen that certificate which purports to have been issued by the Association of Optometrists in the name of the Registrant. The Committee noted that the certificate states that the Registrant was at the time a 'Dispensing Optician Newly Qualified'.

39. When answering questions from the Committee about paragraph 14 of her witness statement, Witness A said that in November 2019, she worked in an office with three internal advocates one of whom was Ross Price. When she asked Mr Price if student dispensing opticians could obtain indemnity insurance, he advised her that they could. She said that she did not query this advice because she was relatively new in the role and that had she been more experienced, she may have checked for herself.

Witness B

40. Witness B told the Committee that the content of her witness statement dated 16 December 2020 contained in the hearing bundle is true to the best of her knowledge and belief and she asked the Committee to adopt it as her evidence. She said that she is still employed as a Dispensing Optician and Practice Manager by [redacted] Practice B.

41. In her statement Witness B confirmed that the Registrant introduced herself when she came to work at [redacted] Practice B. A full name and GOC registration number was provided by the Registrant and she told Witness B that she had qualified as a Dispensing Optician a few weeks earlier. The Registrant worked unsupervised throughout the day.

42. During supplementary questions, Witness B told the Committee that when the Registrant first attended for work on 14 September 2019, she had asked the Registrant for her GOC registration number because she needed it to create a profile on the Specsavers computer system. Witness B said that she did not check the accuracy of the number that the Registrant had provided.

43. In terms of the age of the patients that were seen on the 14 September 2019 by the Registrant, Witness B said that she was aware that some had been under the age of sixteen because certain patients had been contacted by Specsavers to alert them to the fact that the Registrant had been a student at the time of their appointments. They had been provided with an opportunity to return to the store to have the spectacles re-checked. Witness B said that she had been part of this process. She said that she had not personally observed the Registrant attending upon patients.

44. Witness B told the Committee that had the Registrant been supervised whilst carrying out the work, this would have been acceptable. However Witness B went on to say that at the time, she herself had been less than two years qualified and even if she had known that the Registrant had been a student, she would have been unable to have supervised her. When asked by the Committee about 14 September 2019 and whether there had been other professional colleagues in the store, Witness B said that there had been two, an Optometrist and a second Locum Optometrist.

Witness C

45. Witness C told the Committee that the content of her witness statement dated 19 December 2023 contained in the hearing bundle is true to the best of her knowledge and belief and she asked the Committee to adopt it as her evidence. Witness C confirmed that she still works for the Council as *[redacted]*.

46. In her statement, and in response to questions from the Committee, Witness C confirmed that the Registrant was first entered onto the student Dispensing Optician register on the 14 January 2015. She further confirmed that the GOC registration number D-17737 related to another person, a fully qualified Dispensing Optician from the 4 June 2019. Witness C further confirmed that there is never an occasion where a student is provided with a temporary registration number.

47. Subsequently, the Committee re-called Witness C to clarify whether there had been any additional entries onto the Council register in terms of the Registrant's status. Witness C informed the Committee that the Registrant had been given the GOC number SD-7278 and that having checked the records, there had been no additional information entered onto the Council's register about the Registrant's status since the 14 January 2015.

48. Witness C told the Committee that the Council may issue a temporary registration number where an individual is a qualified Dispensing Optician and was studying a further Ophthalmic qualification or where they had come off the register and were seeking restoration. Witness C said that, according to the information held by the Council, the Registrant had not been in either of these categories.

Witness D

49. Witness D told the Committee that the content of his witness statement dated 19 March 2021 contained in the hearing bundle is true to the best of his knowledge and belief and he asked the Committee to adopt it as his evidence. He told the Committee that he is currently employed by Specsavers as an Optometrist at a store in [redacted]. At the time of his statement, he was [redacted] at [redacted] Practice A.

50. In his evidence Witness D said that in September 2019 whilst working as the Store Manager for at [redacted] Practice A, one of his responsibilities had been recruitment. He said that the store required a Dispensing Optician or a Dispensing Assistant and he told the Committee that he would have potentially recruited a student dispensing optician if they had had some experience. He said that he would have paid them the same as a Dispensing Assistant, which was a lower daily rate than a qualified Dispensing Optician.

51. When Witness D posted an advertisement on the social media platform LinkedIn, he was subsequently contacted by the Registrant on 2 September 2019. He said that he noted her profile on LinkedIn which made it clear to him that she had been working as a Locum Dispensing Optician for six years ten months and as a qualified registrant since 2015. He said that he cannot recall at the time if he had seen that she had also put in her profile that she had worked as a Locum from January 2013 which would have pre-dated her qualification status.

52. Witness D said that he knew the Registrant as 'Naseem Salim' because this was her name on the LinkedIn profile and this was the name that she continued to use. He formed a view from the information that he had at the time and the messages that they had exchanged, that she was a qualified Dispensing Optician and at no time did it occur to him that she had been or may have been a student dispensing optician.

53. He told the Committee that in September 2019, the practice was to ask for the Locum's registration number when they attended on their first day of work, and that is what he did. When the Registrant told him on the 8 September 2019 that she had had issues with her professional indemnity insurance which had affected her

registration number, he was satisfied at the time that this was a reasonable explanation and he was reassured that she was registered when she showed him a screenshot of the registration number D-19364. He said that he was further reassured when she showed him an email from ABDO confirming that she had professional indemnity insurance and was registered as a Dispensing Optician.

54. Witness D said that during the work day on the 8 September 2019, the Registrant carried out regulated activities including dispensing spectacles to children. He explained that the term 'focimeter' as it appears in paragraph 20 of his witness statement refers to the checking of the power of spectacles lenses and it is a particularly significant activity when dispensing for children because often they will not say or cannot say if the power of the lens is not as it should be. He said that an incorrectly powered lens can have a lasting impact on a child's vision.

55. In terms of Patient 1, Witness D told the Committee that the Registrant supervised the collection of spectacles on 8 September 2019 following a replacement of the frame, for a child under the age of sixteen. He said that he had not been in work on 15 September 2019 but the documents in the bundle demonstrate that for Patients 2, 3, 4, and 7, the Registrant had authorised the collection of spectacles for children under the age of sixteen. He told the Committee that the families were notified and offered an opportunity to return to the store to have the spectacles checked, and for those that did, that there were no issues arising.

56. In response to questions from the Committee, Witness D said that he had not checked the registration number that had been provided to him by the Registrant because he had had no reason to. He said that for the one day that he worked with her, she had demonstrated a 'very good work ethic' and had not given him any cause to believe that she was incapable of carrying out the role of a Dispensing Optician. He said that her student status had been discovered because Specsavers had carried out a routine internal audit and upon being told of her actual status he had been 'very surprised.' He said that he also felt disappointed that he had been deliberately misled and 'foolish' because two practices had been involved not just one. Witness D told the Committee that the daily rate in September 2019 for a Dispensing Assistant was £110 - £120 and for a qualified Dispensing Optician was £140 - £160.

Witness E

57. Witness E told the Committee that the content of his witness statement dated 18 January 2021 contained in the hearing bundle is true to the best of his knowledge and belief and he asked the Committee to adopt it as his evidence. He has been an

Optometrist Director of [redacted] Practice A since 2017. He explained that his role includes Optometry duties and ensuring that there is regulatory compliance in the store.

58. He said that he did not have any direct contact with the Registrant, having been on holiday on the 14 September 2019. He said that his involvement related to paying her for the locum work. He described how later that month when he came to arrange payment for the Registrant, he typed a registration number that the Registrant had provided into the Council's online register and despite trying several variations of the Registrant's name, was unable to locate her. He said that he cannot recall which registration number he had typed into the system. Witness E referred to WhatsApp messages that he exchanged with Person A and another colleague on or around 21 September 2019 that were in the bundle and said that he contacted his colleagues because he had been concerned that he could not locate the Registrant on the register and 'it did not make sense to me.'

59. Witness E told the Committee that he carried out enquiries over the subsequent days and ultimately contact was made with the Council to report the conduct.

Richard Booth

60. Mr Booth is a registered Optometrist and a member of the GOC panel of expert witnesses. He told the Committee of his qualifications and experience and said that the content of his report dated 1 October 2021 contained in the hearing bundle is true to the best of his knowledge and belief. He asked the Committee to adopt it as his evidence. Mr Booth said that with the status of a student dispensing optician, the Registrant can authorise a restricted or regulated activity such as dispensing and providing spectacles to children providing they are supervised. He said that a student registrant cannot supervise a colleague.

61. In relation to the collection of spectacles, Mr Booth said that the fitting of spectacles when they are collected is 'one of the most crucial elements when it comes to dispensing spectacles.' He said that clinical responsibility for spectacles that are authorised for collection, lies with the authorising supervisor and where spectacles are collected for children, the authorising supervisor will be carrying out a regulated activity. He explained that this supervision cannot be carried out by a student registrant.

62. In terms of Patient 1, Mr Booth referred to paragraph 3.2.6 of his report and said that in his view, the spectacles that had been repaired were 'supplied' to the patient in line with restricted activities referred to in the legislation, because the entire frame had been repaired. He qualified this by acknowledging that some practitioners may disagree. In his opinion, the spectacles had been 'supplied' and the student

Registrant had carried out a regulated activity when she did not have the status to do so. Mr Booth said that for patients two, three, four and seven, the Registrant had very clearly been involved in regulated activities.

63. In response to questions from the Committee, Mr Booth said that in his opinion, the Registrant had breached professional standards 5, 8 and 15 of the Council's Professional Standards for Optical students and he referred the Committee to paragraph 3.2.14 of his report;

Standard 5: Recognise and work within your limits of competence.

Standard 8: Ensure that supervision is undertaken appropriately and complies with the law.

Standard 15: Be honest and trustworthy.

64. He said that in his opinion, the Registrant knew that she was not in a position to supervise colleagues and should have been supervised herself. He went on to say that as she has breached fundamental and basic standards requiring trustworthy conduct, that this in itself is indicative in his view of conduct that falls far below the standard expected.

Submissions

65. Ms Simpeh provided written closing submissions on the facts. She took the Committee through the entirety of the document and highlighted that it is for the Council to prove its case, on a balance of probabilities. She invited the Council to find all paragraphs of the allegation proven.

66. The Committee accepted the advice of the Legal Adviser. She reminded the Committee that in accordance with rules 38 & 39 of the Rules, it is for the Council to prove their case on a balance of probability. She advised that each particular of the allegation should be considered separately including particulars 7, 8 and 9 which related to the Registrant's alleged state of mind. The Committee was advised to approach the witness statements of Person C dated 12 February 2020 and 24 August 2022 which had been exhibited to the witness statement of Witness C. The Committee approached these with caution as he had not been called as a witness, and determined whether having heard all the evidence, any weight should be attached to the hearsay evidence of Person A.

67. The Legal Adviser referred the Committee to the case of ***Ivey v Genting Casinos [2017] UKSC 67*** and the two stage test in relation to dishonesty, and to ***Raychaudhuri v GMC & PSA [2018] EWCA Civ 20127*** when considering whether

conduct is misleading or dishonest or both. The Committee was advised that the Registrant was of good character and whilst this in itself is not a defence, in line with ***Sawati v GMC [2022] EWHC 283 (Admin)***, it ought to take her good character into consideration when assessing propensity to carry out the alleged conduct. The Committee was advised to consider the legislation referred to in the allegations specifically the definition of 'restricted activity' and to have regard to all the evidence that it had been presented with both documentary and verbally during its deliberations.

The Committee's Decision

68. The Committee considered each individual paragraph of the allegation in turn. In reaching its decision the Committee gave consideration to how the witness evidence sat with facts that were not in dispute, contemporaneous documents, any consistent or inconsistent evidence and the inherent probability or improbability of any account of events.

69. In reaching its decision on the facts, the Committee took into account all evidence before it. This includes the written witness statements and subsequent oral evidence of the witnesses that attended the hearing, and the hearsay evidence of Person A. The Committee also took into account the Registrant's 'good character' in terms of her propensity to act as alleged and the closing submissions received in writing from Ms Simpeh.

70. The Committee considered Part 4 Subsection 27 of the Opticians Act 1989 which provides that;

(1) A person shall not sell

(a)

(b) Subject to the following provisions of this section, any optical appliance or zero powered contact lens unless the sale is effected by or under the supervision of a registered medical practitioner, a registered optometrist or a registered dispensing optician.

(2) Subsection (1) above shall not apply to any of the following sales –

(a) A sale for a person who has attained the age of sixteen ..

71. The Committee further noted that subsection 27(3)(d) states that,

(d) The Seller is or is under the general direction of, a registered medical practitioner, a registered medical practitioner, a registered optometrist or a registered dispensing optician.

Particular 1

On or around 8 September 2019 at [redacted] Practice A, you carried out restricted activities as a dispensing optician whilst unregistered and/or unsupervised, contrary to the Opticians Act 1989 as amended in 2005, Part 4 Subsection 27 (1) (b) to;

a. Patient 1;

72. The Committee noted that Mr Booth and the Council had used the terms 'restricted' and 'regulated' interchangeably during the hearing. In line with the allegation, the Committee went on to consider the definition of a restricted activity as provided in the Opticians Act and noted that it included 'supplying' spectacles to a person under the age of sixteen.

73. The Committee noted that Mr Booth had provided an expert opinion about whether the repairing of spectacles for patient one, amounted to 'supplying' the spectacles. The Committee deliberated very carefully about whether it regarded a repair of spectacle frames as 'supplying' spectacles. It considered the evidence of Mr Booth, an expert in the field of Optometry and noted that he had provided a fair opinion having taking into account an opposing view, when he had concluded that a repair in the circumstances had been a 'supply.' The Committee on balance, agreed with his opinion and determined that the Registrant had been carrying out a restricted activity.

74. The Committee then went on to consider whether the Registrant had acted as a dispensing optician, without supervision and when unregistered. The Committee reminded itself of Witness C's evidence that since being registered as a student dispensing optician on 14 January 2015, that there had been no change to the Registrant's status. The Committee had regard to the contemporaneous document in the bundle at page 41 which demonstrates that the Registrant authorised the collection of patient one's spectacles on the 8 September 2019 when she was unsupervised, and held the status of a student registrant. The sight test record for patient one records their year of birth as 2011 confirming that when they were supplied with the spectacles they were under the age of sixteen.

75. The Committee was satisfied on the balance of probability that on the 8 September 2019, the Registrant had carried out a restricted activity acting as a Dispensing Optician when she was neither supervised or registered as a Dispensing Optician.

76. Particular 1 is found proved.

Particular 2

On or around 15 September 2019 at [redacted] Practice A, you carried out restricted activities as a dispensing optician whilst unregistered and/or unsupervised, contrary to the Opticians Act 1989 as amended in 2005, Part 4 Subsection 27 (1) (b), to;

- a. Patient 2; and/or*
- b. Patient 3; and/or*
- c. Patient 4; and/or*

77. In relation to Patients 2, 3 and 4, having regard to its findings for paragraph one of the allegation, the Committee was satisfied that on the 15 September 2019, the Registrant was of student registrant status.

78. The Committee noted that the contemporaneous document at page 46 of the bundle demonstrates that on 8 September 2019, the Registrant authorised a collection of spectacles for patient two and at page 46 the patient's year of birth confirms that they were under sixteen at the time.

79. In view of the patient's age at the time, the Committee was satisfied that in supervising the collection of Patient 2's spectacles, the Registrant had carried out a restricted activity. The Committee was satisfied on the balance of probability that the Registrant had carried out a restricted activity acting as a Dispensing Optician when she was neither supervised as a student or registered as a Dispensing Optician.

80. Particular 2a is found proved.

81. The Committee had regard to the contemporaneous document at page 53 of the bundle which demonstrates that on 8 September 2019, the Registrant authorised a collection of spectacles for Patient 3. At page 48, the patient's year of birth showed in its redacted form that Patient 3 was sixteen or was turning sixteen in 2019. The Committee reminded itself that Mr Booth had informed the Committee that he had made an enquiry and established that they were not yet sixteen as at 8 September

2019. The Committee found Mr Booth to be a reliable witness and was satisfied that it had been established on the balance of probability that the patient had been under sixteen at the relevant time. The Committee determined from this evidence that the Registrant had carried out a restricted activity.

82. Having determined that the Registrant had carried out a restricted activity in terms of Patient 3, the Committee in accordance with its previous findings, concluded on the balance of probability that the Registrant had acted as a Dispensing Optician when she was neither supervised as a student or registered as a Dispensing Optician.

83. Particular 2b is found proved.

84. The Committee considered the contemporaneous document at page 55 of the bundle and noted from Patient 4's year of birth that on 8 September 2019, they had been under the age of sixteen. The Committee further noted that the document at page 60 of the bundle demonstrates that on the 8 September 2019, the Registrant authorised the collection of spectacles for Patient 4.

85. In view of the patient's age at the time, the Committee was satisfied that in supervising the collection of Patient 4's spectacles, the Registrant had carried out a restricted activity. The Committee was satisfied on the balance of probability that Registrant had carried out a restricted activity acting as a Dispensing Optician when she was neither supervised as a student or registered as a Dispensing Optician.

86. Particular 2c is found proved.

Particular 3

On or around 14 September 2019 at [redacted] Practice B, you carried out restricted activities as a dispensing optician whilst unregistered and/or unsupervised, contrary to the Opticians Act 1989 as amended in 2005, Part 4 Subsection 27 (1) (b) to;

a. Patient 7

87. The Committee considered the contemporaneous document at page 62 of the bundle and noted from Patient 7's year of birth that on 14 September 2019, they had been under the age of sixteen. The Committee further noted that the document at page 68 of the bundle demonstrates that on the 14 September 2019, the Registrant authorised the collection of spectacles for Patient 7.

88. In view of the patient's age at the time, the Committee was satisfied that in supervising the collection of Patient 7's spectacles, the Registrant had carried out a restricted activity. The Committee was satisfied on the balance of probability that Registrant had carried out a restricted activity acting as a Dispensing Optician when she was neither supervised as a student or registered as a Dispensing Optician.

89. Particular 3 is found proved.

Particular 4

On or around 8 September 2019, you provided [redacted] Practice A with a false registration number, 'D-19364'

90. The Committee considered the written and oral evidence of Witness D and found his evidence to be consistent. The Committee noted that the Registrant had provided the registration number D-19364 to Witness D on the 8 September 2019. The Committee found this to be an incorrect and false number because it was satisfied that her actual registration number was SD-7278 as demonstrated at page 114 of the bundle.

91. Having regard to the evidence the Committee concluded on the balance of probability that the Registrant provided [redacted] Practice A with a false registration number on 8 September 2019, namely D-19364.

92. Particular 4 is found proved.

Particular 5

On or around 14 September 2019, you provided [redacted] Practice B with the registration number 'D-17337 which was not yours.

93. The Committee considered the written and oral evidence of Witness B and found her evidence to be consistent. The Committee noted that the Registrant had provided the registration number D-17337 to Witness B on the 14 September 2019. The Committee found this to be a registration number that did not belong to the

Registrant because it was satisfied that her actual registration number was SD-7278 as demonstrated at page 114 of the bundle.

94. Having regard to the evidence the Committee concluded on the balance of probability that the Registrant provided [redacted] Practice B with a registration number that was not her registration number, on 14 September 2019, namely D-17337.

95. Particular 5 is found proved.

Particular 6

On or around 20 September 2019, you stated via electronic communication with Colleague A that you had “just qualified 2 weeks ago”

96. The Council noted that the primary evidence in support of this allegation arises from the witness statement evidence of Person A which the Committee has admitted into the hearing as hearsay evidence. The Committee considered that Person A’s witness statement was corroborated by WhatsApp messages at pages 27 – 32 of the bundle. At page 28, when Person A sends a message to the Registrant to say that she cannot locate the Registrant on the Council’s register, the Registrant’s response was ‘Hey [redacted], you probably won’t be able to see my GOC number on the register as of yet as I’ve only just qualified 2 weeks ago and received it then. I’m waiting on GOC/ABDO to change it over the next couple of week. I had mentioned this to [redacted] beforehand.’

97. The Committee also noted that at page 30 when Person A continued to query the Registrant’s student status on the Council’s register, the Registrant responded with ‘Yes it will still show up as student as I’ve only just qualified and applied for my full registration about 2 weeks ago.’ The Committee had regard to the evidence of Witness E when he had said that a newly qualified Dispensing Optician would ordinarily be placed on the public facing register ‘almost immediately.’

98. The Committee took into account that Person A’s evidence was supported by other evidence. Witness E had also raised concerns around this time about the Registrant’s status and he had spoken to Person A about his concerns. The Committee was satisfied that Person A’s witness statement evidence was not the sole and decisive evidence in relation to having communicated with the Registrant about her status because the contemporaneous WhatsApp messages together with the evidence of Witness E, corroborated her evidence. For these reasons the

Committee decided that it could place some weight on the evidence from Person A and went on to determine on the balance of probability, that the Registrant had sent the alleged message to her on or around 20 September 2019.

99. Particular 6 is found proved.

Particular 7a

Your conduct at (4) and/or (5) above was inappropriate in that:

- a. *you knew that you had given [redacted] Practice A a different registration number in an attempt to conceal that you were an unregistered dispensing optician;*

100. The Committee first considered whether on the balance of probability, the Registrant knew when she provided the registration number to [redacted] Practice A on the 8 September 2019 that it was different from her own registration number.

101. The Committee noted that the number provided was entirely different from her own registration number and determined that it was improbable that the Registrant had mistakenly provided a different registration number as opposed to her own. For this reason the Committee found that the Registrant knew that on the 8 September 2019, that she had knowingly provided a registration number to [redacted] Practice A that was different from her own.

102. The Committee went on to consider whether the Registrant knowingly provided the different registration number to conceal that she was an unregistered Dispensing Optician with student status. The Committee reminded itself of the evidence from Witness D and the LinkedIn profile that the Registrant had created in which she had declared herself to be a Dispensing Optician and upon attending work on the 8 September 2019, she had told Witness D that she had been experiencing difficulties in obtaining her General Optical Council registration number online. The Committee had regard to the telephone conversation between the Registrant and Witness A at page 98 of the bundle and noted that there was no other evidence to support the Registrant's claim that she had disclosed her student status. For this reason, the Committee determined that the Registrant had demonstrated a pattern of behaviour designed to conceal her student status.

103. Having determined that the Registrant knowingly attempted to conceal her status, the Committee went on to consider whether this was inappropriate conduct. The Committee having carefully considered the factual circumstances found on the

balance of probability that the Registrant's actions were wholly improper in the circumstances and therefore inappropriate.

104. Particular 7a is found proved.

Particular 7b

- b. you knew that you had given [redacted] Practice B a different registration number in an attempt to conceal that you were an unregistered dispensing optician*

105. The Committee considered the factual circumstances and noted that the Registrant conducted herself in a very similar manner as for Particular 7a. The Committee reminded itself of the evidence of Witness B. She told the Committee that the Registrant had provided her with a registration number on 14 September 2019 from memory, for the store's internal computer system. The Registrant told Witness B that she had qualified as a Dispensing Optician a few weeks prior. Witness B's evidence was that she had had no reason to question the validity of the registration number provided to her by the Registrant.

106. The Committee noted that the registration number was very different to the Registrant's own registration number and therefore it was improbable that she had mistakenly provided a different registration number. For this reason the Committee found that the Registrant knew that on the 14 September 2019, that she had knowingly provided a registration number to [redacted] Practice B that was different from her own.

107. Having regard to the pattern of deceptive behaviour determined by the Committee at Particular 7a of the allegation, the Committee went on to find that in providing a second registration number that was different from her own, the Registrant had continued to try and conceal her student status.

108. Having determined that the Registrant knowingly attempted to conceal her status for a second time, the Committee went on to consider whether this was inappropriate conduct. The Committee having carefully considered the factual circumstances found on the balance of probability that the Registrant's actions were wholly improper in the circumstances and therefore inappropriate.

109. Particular 7b is found proved.

Particular 8a

Your conduct at (4) and/or (5) and/or (6) above was misleading in that:

- a. you knew that you had given [redacted] Practice A a different registration number in an attempt to conceal that you were an unregistered dispensing optician;*

110. Having determined that the Registrant knowingly provided a registration number to [redacted] Practice A that was different from her own to try and conceal her student status, the Committee went on to consider whether these actions were misleading.

111. The Committee in assessing 'misleading' used the dictionary definition of the term and considered whether the Registrant's actions had 'given the wrong idea or impression.'

112. The Committee reminded itself of the factual circumstances. Witness D gave evidence about the Registrant's LinkedIn profile and provided screenshots which the Committee has seen. The Committee found that in this profile the Registrant clearly holds herself out to be a registered Dispensing Optician. Witness D told the Committee that when he met the Registrant at [redacted] Practice A, she had presented as a Dispensing Optician, her work ethic had been good and he had had no reason at the time to doubt the legitimacy of her status as a Dispensing Optician.

113. It is clear to the Committee that the Registrant set out to create the impression to [redacted] Practice A that she was a registered Dispensing Optician when she was not. Witness D gave evidence that had the Registrant declared her student status, that she would have been paid a lower daily rate than for a registered Dispensing Optician. It is not for the Committee to speculate about any motive for the Registrant's actions however this is a factor that the Committee has taken into account in reaching its decision.

114. The Committee determined that the actions of the Registrant on the balance of probability were misleading.

115. Particular 8a is found proved.

Particular 8b

Your conduct at (4) and/or (5) and/or (6) above was misleading in that:

- b. you knew that you had given [redacted] Practice B a different registration number in an attempt to conceal that you were an unregistered dispensing optician;*

116. The Committee noted that the factual circumstances are very similar as for Particular 8a of the allegation. Having created a LinkedIn profile in which the Registrant held herself out to be a registered Dispensing Optician, she continued to present as a Dispensing Optician on the 8 September 2019 at [redacted] Practice A and then again at the [redacted] Practice A store on 14 September 2019. The evidence of Witness B was that she had had no cause to be suspicious of the Registrant's status when she worked at the [redacted] Practice B on 14 September 2019.

117. It is clear to the Committee that for a second time, the Registrant set out to create an impression, this time to [redacted] Practice B, that she was a registered Dispensing Optician when she was not. The Committee determined that the actions of the Registrant on the balance of probability were misleading.

118. Particular 8b is found proved.

Paragraph 8c

Your conduct at (4) and/or (5) and/or (6) above was misleading in that:

- c. you knew that you had not fully qualified as a Dispensing Optician;*

119. The Committee considered the evidence of Witness C in relation to the registration status of the Registrant. It reminded itself of page 114 of the bundle which demonstrates the Registrant's student status from 14 January 2015 and Witness C's evidence when she told the Committee that the status had not changed to date. The Committee considered that had the Registrant qualified as a Dispensing Optician since 2015, her status on the online register would have reflected this.

120. Having determined that there had been a pattern of behaviour by the Registrant to try and conceal her student status, the Committee is satisfied on the balance of

probability that when the Registrant provided the two registration numbers that were different to her own, she knew at the time of doing so that she was not a fully qualified Dispensing Optician.

121. In relation to Particular (6) of the allegation, the Committee reminded itself of the screenshots provided by Person A at pages 28 and 30 of the bundle. It is very clear to the Committee that in these messages by declaring that she had qualified two weeks prior, the Registrant was attempting to give the impression that she was a qualified Dispensing Optician. The Committee is satisfied on the balance of probability that when the Registrant wrote these messages, she knew at the time of doing so that she had not qualified as a Dispensing Optician.

122. The Committee determined that the Registrant's actions in providing different registration numbers than her own and in writing the messages to Person A were on the balance of probability misleading.

123. Particular 8c is found proved.

Particulars 9a & 9b

Your conduct at (4) and/or (5) and/or 6 above was dishonest in that:

- a. you attempted to deceive [redacted] Practice A by submitting a different false registration number to appear as a fully qualified Dispensing Optician when you were not;*
- b. you attempted to deceive [redacted] Practice B by submitting a different registration number to appear as a fully qualified Dispensing Optician when you were not;*

124. The Committee had regard to the two-stage test laid out in ***Ivey v Genting Casinos (UK) Ltd t/a Crockfords [2017] UKSC 76***. The Committee determined that its factual findings thus far were relevant to the first stage of the ***Ivey*** test and took them into account where appropriate to do so when considering 9a and 9b.

125. Having regard to its factual findings the Committee determined that the Registrant knew in her mind that she was providing registration numbers that were

very different from her own. Further, that she knew this to be wrong. The Committee took into account that providing different registration numbers was part of a pattern of conduct by the Registrant beginning with the LinkedIn profile, designed to conceal her student registrant status.

126. The Committee noted that having provided the different registration numbers, the Registrant had continued with her deceptive behaviour by carrying out the role of a Dispensing Optician including restricted activities. The evidence from Witness D had informed the Committee that the Registrant's true status had been revealed because a routine internal audit had been carried out and this had coincided with concerns raised by Witness E. At no time had the Registrant disclosed to either the *[redacted]* Practice A or *[redacted]* Practice B that she had been registered as a student Dispensing Optician. The Committee is mindful of the position put forward by the Registrant in the telephone conversation with Witness A on the 24 October 2019 at page 98 of the bundle. The Committee on the evidence decided that it did not accept the Registrant's version of events.

127. The Committee considered the expert evidence of Mr Booth and assessed how it assisted if at all with the test for dishonesty. The Committee reminded itself of the evidence of Mr Booth and recalled that he had said that whether the Registrant had acted dishonestly was a matter for the Committee to determine.

128. The Committee went on to consider the second limb of the dishonest test in *Ivey*; would the Registrant's conduct be considered dishonest by the standards of ordinary decent people?

129. The Committee determined that for Particulars 9a and 9b, an ordinary decent person would consider the Registrant's actions to be dishonest. The Registrant had demonstrated a course of conduct designed to conceal her true status and the registration numbers that she had provided had played a significant part in the deception. The Committee decided on the balance of probability that the Registrant's conduct had been dishonest.

130. Particulars 9a and 9b are found proved.

Paragraph 9c

Your conduct at (4) and/or (5) and/or 6 above was dishonest in that

- c. you attempted to deceive Colleague A by suggesting you were a fully qualified Dispensing Optician, when you were not;*

131. The Committee recalled its findings in relation to Particular 8c. It had determined that when the Registrant sent the WhatsApp messages Person A at pages 28 and 30 of the bundle, the Registrant had knowingly tried to conceal her student status. The Committee had decided that at the time of sending the messages, the Registrant had known that she was not a qualified Dispensing Optician.

132. Having arrived at this decision, the Committee is satisfied that the first stage of **Ivey** is made out because the Registrant knew at the time that she was a student registrant and the information that she had provided was wrong.

133. The Committee went on to consider the second limb of the dishonest test in **Ivey**; would the Registrant's conduct be considered dishonest by the standards of ordinary decent people?

134. The Committee determined that for Particular 9c, an ordinary decent person would consider the Registrant's actions to be dishonest. The Registrant had continued during September 2019 to demonstrate a course of conduct designed to conceal her student status. It was on or around 20 September 2019 when she exchanged the relevant messages with Person A in which she had said that she had qualified as a Dispensing Optician when this was untrue. The Committee was satisfied on the balance of probability that at no time did the Registrant disclose her true status to Person A.

135. The Committee decided on the balance of probability that the Registrant's conduct had been dishonest.

136. Particular 9c is found proved.

Misconduct

137. Having found the alleged facts proved in their entirety, the Committee next considered whether the facts found proved amounted to the statutory ground of misconduct.

138. The Committee heard submissions on misconduct on behalf of the Council from Ms Simpeh. She provided the Committee with written submissions and she took the

Committee through them. Ms Simpeh submitted that the individual Particulars of the allegation amount to misconduct.

139. The Committee received and accepted advice from the Legal Adviser. The Committee was advised to remind itself of paragraphs 15.5 – 15.9 of the Council's Hearings and Indicative Sanctions Guidance which highlighted that there was no statutory definition of misconduct. For guidance on assessing misconduct, the Legal Adviser referred to the case of **Roylance v GMC [2000]1 AC 311** specifically,

'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 to be followed by a practitioner in the particular circumstances. The misconduct is qualified in two respects. First it is qualified by the word 'professional' which links the misconduct to the profession ...secondly the misconduct is qualified by the word 'serious.' It is not any professional misconduct which will qualify. The professional misconduct must be serious.'

140. The Legal Adviser also referenced **Nandi v GMC [2004] EWHC 2317 (Admin)** where the court referred to **Roylance** and described misconduct as conduct that would be *'regarded as deplorable by fellow practitioners.'*

141. The Registrant's conduct as proved involved her dishonestly holding herself out to be a registered Dispensing Optician on the LinkedIn platform and in person at **[redacted]** Practice A and **[redacted]** Practice B when she knew that she was not. She knowingly presented false and inaccurate information to Specsavers and proceeded to work as a registered Dispensing Optician including in restricted activities as governed by the Opticians Act 1989 which included patients under the age of sixteen. The Registrant continued with the deception and when her registration status was queried by Specsavers, she was untruthful and said that she had recently qualified as a Dispensing Optician. Her deception was discovered when internal enquiries revealed that she had been registered with the Council as a student Dispensing Optician.

142. The Committee took into account the evidence of Mr Booth and the submissions from Ms Simpeh in considering which if any of the relevant professional standards had been breached. The Council's Standards for Optical Students (2016) ('the Council's Standards') refer specifically to:

'Making the care of your patients your first and overriding concern

The care, well-being and safety of patients are at the heart of being a professional. Patients will often have the same expectations of students as they would of qualified

healthcare professionals and they must always be your first concern from the beginning of your study, through to your pre-registration training and beyond.'

143. The Committee determined that the following Council's Standards been breached:

- 5.1 *Recognise the limits of your scope of training including your knowledge, skills and experience.*
- 5.3 *Understand and comply with the requirements of student registration with the General Optical Council and the legal obligations of undertaking any Restricted functions.*
- 8.4 *Comply with all legal requirements governing the activity.*
- 10.1.2 *Consider the needs and welfare of your patients.*
- 15.1 *Act with honesty and integrity to maintain public trust and confidence in your profession.*
- 15.4 *Ensure that you do not make false or misleading statements when describing your individual knowledge, experience, expertise and specialities, including by the use of titles.*
- 15.6 *Do not make misleading, confusing or unlawful statements within your communications.*
- 16.1 *Ensure that your conduct, whether or not connected to your professional study does not damage public confidence in you or your profession.*
- 16.2 *Ensure your conduct in the online environment particularly in relation to social media, whether or not connected to your professional study does not damage public confidence in you or your profession.*

144. The Committee determined that each of these standards had been breached by the Registrant. The Committee found that the Registrant had carried out a course of dishonest conduct that had been pre-meditated and had been designed to deceive members of the public, Specsavers, patients and colleagues. It was the Committee's view that the Registrant in embarking on this course of conduct had shown a blatant disregard for the professional standards expected of an optical student.

145. The Committee found that the Registrant had demonstrated no consideration for colleagues or patients whom she involved in the deception including placing patients at risk of harm. The Committee was satisfied that the Registrant ought to have been aware that she had potentially placed patients at risk of harm. The Committee went on to determine that the Registrant had abused the trust placed in her by colleagues and patients and had been dishonest with Specsavers from the time that she had contacted Witness D on LinkedIn until her student status had been revealed.

146. It was the Committee's view that the Registrant's actions fell far below the professional standards expected of a student dispensing optician and her conduct would be regarded as deplorable by fellow practitioners.

147. The Committee decided that the Registrant's conduct was serious and occurred during the exercise of her professional practice.

148. The Committee consequently determined that the facts found proved amounted to misconduct.

Impairment

149. Having determined that the facts found proved amounted to misconduct, the Committee went on to consider whether the Registrant's fitness to practise is currently impaired. Ms Simpeh on behalf of the Council provided written submissions on impairment and took the Committee through the document in its entirety.

150. The Committee accepted the advice of the Legal Adviser which included reference to the principles established in the cases of ***CHRE v NMC and Grant EWHC 927 (Admin)*** and ***Cohen v GMC [2008] EWHC 581 (Admin)***. The Committee was advised to consider personal impairment first; specifically whether the Registrant had provided any evidence in terms of insight, reflection, remorse or remediation. The Legal Adviser advised the Committee to determine whether there was a risk of repeat conduct by the Registrant and advised that the Registrant's

decision not to engage in the hearing is a legitimate factor for the Committee to take into account.

151. The Committee was further advised by the Legal Adviser to consider the public interest element of impairment and whether an ordinary well-informed person would expect a declaration of current impairment in order to promote and maintain public confidence in the profession. The Legal Adviser summarised for the Committee's benefit the approach formulated by Dame Janet Smith in her Fifth Report from the Shipman case, cited with approval in Grant, namely whether the Registrant:

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

152. The Committee bore in mind the Council's overarching objective and gave equal consideration to each of its limbs as set out below,

'To protect, promote and maintain the health, safety and well-being of the public, the protection of the public by promoting and maintaining public confidence in the profession and promoting and maintaining proper professional standards and conduct.

153. The Committee first considered the questions endorsed in **Grant** in relation to past behaviour. It concluded that by carrying out restricted activities which involved children, without having the requisite qualification, the Registrant had in the past put patients at risk of harm. The Committee considered that in holding herself out to be a registered Dispensing Optician and acting dishonestly about her registration status, the Registrant had in the past brought the profession into disrepute and breached fundamental tenets of the profession, as demonstrated by the breaches of professional standards outlined above. The Committee has made findings of dishonesty and therefore an answer to the last question has already been provided.

154. Following on from the consideration of past behaviour, the Committee went on to consider the questions to be asked from the case of **Cohen** as follows:

- a. Whether the conduct leading to the allegations is easily remediable?
- b. If it is, whether it has been remedied, and then,
- c. Whether it is likely to be repeated?

155. The Committee considered that dishonest conduct is difficult, but not impossible to remediate. The lack of engagement however by the Registrant in this hearing meant that the Committee was left with no option but to conclude that this particular misconduct was not easily remediable. In the absence of evidence of any remedial activity, for example courses undertaken or reflection on the effect of the misconduct on patients, colleagues or the reputation of the profession, the Committee was unable to satisfy itself that there would be no repetition of the Registrant's conduct.

156. Given that the Registrant had not engaged with the hearing process it meant that the Committee had had no option but to conclude that the conduct had not been remedied. The Committee then returned to the questions posed by Dame Janet Smith above and concluded in light of the conduct not being remedied, that there was a future risk that patients would be placed at an unwarranted risk of harm. Furthermore, that the profession would be brought into disrepute, that fundamental tenets of the profession may be breached in future and that the dishonesty might recur. It determined in the circumstances that the risk of repetition was high.

157. On the basis that there remained a risk to the health, safety and wellbeing of the patients, the Committee concluded that the Registrant's current fitness to practise is impaired on a personal level.

158. The Committee then considered the wider public interest in maintaining public confidence in the profession and in promoting and maintaining proper professional standards and conduct. It determined that in circumstances where the Registrant had acted dishonestly towards patients, colleagues and to her employer, public confidence would be undermined if a finding of impairment were not made. The Committee concluded that all three limbs of the overarching objective were engaged.

159. The Committee accordingly concluded that the Registrant's fitness to practise is currently impaired.

Application to introduce new evidence

160. Ms Simpeh, on behalf of the Council made an application to adduce new evidence on the basis that it is relevant to the Committee's decision on sanction. She requested time to enable her instructing Solicitor to prepare a witness statement

exhibiting screenshots of the Registrant's recent LinkedIn profiles. She submitted that until recently the Registrant's LinkedIn profile had displayed the same profile as at page 76 of the bundle and that a more recent check of the profile had seen an amendment from 'Locum Dispensing Optician' to 'Locum Dispenser.' Ms Simpeh told the Committee that an email was to be sent to the Registrant this morning, advising her of the Council's intention to apply to have the new evidence introduced.

161. The Committee accepted the advice of the Legal Adviser. She reminded the Committee that according to rule 40(1) of the Rules, evidence may be admitted at any stage of the hearing where the Committee considers it to be fair and relevant to the case before it. The Legal Adviser said that whilst the Committee had not had sight of the new evidence, it had heard from Ms Simpeh about the proposed content.

162. In terms of fairness, the Committee was advised that whilst the Registrant was to be sent an email this morning, she was not aware of the content of the proposed witness statement as it had not yet been prepared. The Legal Adviser said that of particular significance is whether the proposed new evidence will be relevant to the case before it. The Committee was advised that the allegations found proven do not include a continuing course of dishonest conduct which continued until the present date. The Committee was invited to consider whether introducing evidence that may fall outside of the remit of the proven allegations would be fair to the Registrant.

163. The Committee first considered whether the proposed new evidence would be relevant to its decision on sanction.

164. The Committee, having reminded itself of the proven factual allegations, noted that the dishonest conduct was fact-specific and related to the Registrant's conduct in September 2019. There is no mention of a continuing course of conduct beyond this period. The Committee decided that it did not need to read the new evidence. Having regard to rule 40(1) of the Rules and the criteria for admitting evidence, the Committee was satisfied that the proposed new evidence was not relevant. Having made this decision, the Committee determined that it would be unfair to the Registrant to admit irrelevant evidence, regardless of the stage of the hearing.

165. The Committee refused the Council's application to adduce new evidence.

Sanction

166. Having determined that the Registrant's fitness to practise is currently impaired, the Committee went on to consider sanction. Ms Simpeh on behalf of the Council provided written submissions on the Council's position and took the Committee through the document in its entirety. Ms Simpeh informed the Committee that the Council considered the appropriate and proportionate sanction to be erasure.

167. The Committee accepted the advice of the Legal Adviser. She referred the Committee to the Hearings and Indicative Sanctions Guidance ('the Guidance') and reminded the Committee that it must come to its own independent view in terms of the most appropriate and proportionate sanction to impose. The Committee was advised that there was no burden or standard of proof at this stage of the hearing.

168. The Legal Adviser advised the Committee that the purpose of imposing a sanction is not to punish, but that the appropriate sanction may have a punitive effect. The Committee was advised to have regard to the principle of proportionality, balancing the Registrant's interests with the public interest. In accordance with the Guidance, the Committee was advised to consider aggravating and mitigating factors together with the extent of the dishonesty. The Legal Adviser said that the impact of the dishonesty ought to be considered both in terms of the Registrant's character and most importantly, on the wider reputation of the profession and public perception of the profession.

169. The Committee was advised to consider the least restrictive sanction first and, if not appropriate or proportionate, to move to the next available sanction in ascending order. The Legal Adviser reminded the Committee to be mindful of the overarching objective, specifically public protection when considering each available sanction and to have particular regard to those parts of the Guidance that refer to acts of dishonesty. The Legal Adviser referenced ***Tait v Royal College of Veterinary Surgeons [2003]*** which provided that '*For all professionals, a finding of dishonesty lies at the top end of the spectrum of gravity and misconduct.*' Also ***Bolton v Law Society [1994] WLR 512*** and '*The reputation of the profession is more important than the fortunes of any individual member. Membership of a profession brings many benefits but that is part of the price.*'

170. In reaching its decision on sanction, the Committee took into account the submissions on behalf of the Council by Ms Simpeh, the facts found proved and its previous findings on misconduct and impairment.

171. Throughout its deliberations the Committee had regard to the overarching objective, giving equal consideration to each of its limbs.

172. The Committee considered the following to be aggravating factors:

- a. The misconduct occurred in connection with and during the Registrant's professional practice.

- b. The dishonesty was repeated and covered up by the Registrant and on more than one occasion she had attempted to conceal her student status.
- c. The Registrant's dishonest behaviour only came to an end following an internal audit which revealed her student status.
- d. The Registrant breached a number of professional standards as outlined in the Impairment determination. Her conduct breached the trust of colleagues and patients.
- e. There was a potential for harm to patients including to children.
- f. No evidence of insight, remorse, reflection or remediation had been provided by the Registrant.

173. In mitigation, the Committee acknowledged that the Registrant had been of good character in that there had been no previous fitness to practise history. There was no evidence of repetition. The Committee had regard to the student status of the Registrant at the time of the misconduct and decided on balance that this could be either an aggravating or mitigating factor.

174. It was the Committee's assessment that on a scale of dishonest conduct, the Registrant's actions were at the higher level of seriousness, having considered the aggravating and mitigating factors. It took the view that an informed and reasonable member of the public would be deeply concerned by the Registrant's actions and that the impact on the reputation of the profession was significant. The Committee determined that this was particularly prevalent having regard to the Committee's finding that there remained a risk to public safety and the risk of repetition was high.

175. The Committee first considered taking no action. It determined, having regard to the Guidance, that there were no exceptional circumstances to justify it doing so. Taking no action would not protect the public or be in the wider public interest, it would not reflect the seriousness of the misconduct and therefore it would be entirely inappropriate.

176. The Committee decided that the imposition of a financial penalty was not appropriate or proportionate. It had regard to the financial motive that may have been behind the Registrant's dishonest conduct however it had no evidence that she had benefitted financially from her actions. The Committee's view is that in any event

a financial penalty would not reflect the seriousness of the misconduct and would not protect the public against the risk of repetition.

177. The Committee next considered a period of conditional registration. It took into account paragraph 21.25 of the Guidance and determined that the Registrant's lack of engagement meant that conditional registration was not appropriate. The Committee decided that having regard to the nature of the misconduct, it was not possible to formulate conditions to protect patients against the risk of a repetition of dishonest behaviour and there was no indication that the Registrant would comply with any conditions imposed.

178. Furthermore, it determined that the aggravating factors identified by the Committee were such that conditional registration would be a disproportionate sanction due to the seriousness of the misconduct.

179. The Committee next considered a suspension order and the relevant sections of the Guidance contained within paragraph 21.29 namely;

'This sanction may be appropriate when some or all of the following factors are apparent (this list is not exhaustive):

- a. Serious instance of misconduct where a lesser sanction is not sufficient.*
- b. No evidence of harmful deep-seated personality or attitudinal problems.*
- c. No evidence of repetition of behaviour since incident.*
- d. The Committee is satisfied the registrant has insight and does not pose a significant risk of repeating behaviour.*
- e. In cases where the only issue relates to the registrant's health, here is a risk to patient safety if the registrant continued to practise, even under conditions.*

180. The Committee considered that paragraph 21.29 part a) was engaged given the aggravating factors identified. In considering the limbs at parts b), c) and d), the Committee had regard to the Registrant's non-engagement. She has not provided the Committee with any evidence of insight, reflection, remorse or remediation. Therefore, the Committee could not rule out deep-seated personality or attitudinal problems. The Committee in particular could not be satisfied that the Registrant has insight. It has already determined that there is a high risk of repeat behaviour, albeit has accepted as a mitigating factor that there is no evidence of any repetition of the misconduct since the incidents, to date.

181. In accordance with paragraph 8.3 of the Guidance, the Committee considered whether a suspension order in the circumstances would sufficiently protect the public, promote and maintain public confidence in the profession and promote and maintain proper professional standards in line with the overarching objective.

182. The Committee went on to consider the sanction of erasure and had regard to paragraph 21.35 of the Guidance which states the following:

'Erasure is likely to be appropriate when the behaviour is fundamentally incompatible with being a registered professional and involves any of the following (this list is not exhaustive):

- a. Serious departure from the relevant professional standards as set out in the Council's Standards of Practice for registrants and the Code of Conduct for business registrants;*
- b. Creating or contributing to a risk of harm to individuals (patients or otherwise) either deliberately, recklessly or through incompetence, and particularly where there is a continuing risk of harm to patients;*
- c. Abuse of position/trust (particularly involving vulnerable patients) or violation of the rights of patients;*
- d. Offences of a sexual nature, including involvement in child pornography;*
- e. Offences including violence;*
- f. Dishonesty (especially where persistent and covered up);*
- g. Repeated breach of the professional duty of candour, including preventing others from being candid, that present a serious risk to patient safety; or*
- h. Persistent lack of insight into seriousness of actions or consequences.*

183. The Committee formed the view that paragraph 21.35 part a) was engaged. The Committee has highlighted the standards it found to be breached in its earlier

determination on misconduct and impairment. In relation to paragraph 21.35 part b), the Committee had determined that there had been a risk of harm to patients and that there remains a risk having regard to the absence of any insight, remorse or remediation. The Committee considered paragraph 21.35 part c) to be engaged as the Committee had previously found that the Registrant had acted in a dishonest fashion towards colleagues and patients in concealing her student status. In view of the persistent dishonest conduct found by the Committee, it determined that paragraph 21.35 part f) is engaged and in relation to part h), the Committee has not received any evidence of insight from the Registrant.

184. In considering the many factors in the Guidance in relation to erasure identified above as being relevant to the Committee's deliberations, the Committee determined that it had no option but to conclude that the Registrant's behaviour was fundamentally incompatible with continued registration. The Registrant's lack of engagement with the hearing process has meant that there is no information before the Committee upon which it could conclude that a lesser sanction would be effective in upholding the overarching objective. The lack of information from the Registrant about any aspect of her misconduct, including her current circumstances, made it difficult for the Committee to properly take account of her interests when balanced with the public interest. In circumstances where a high risk of repetition remained, where the public required protection and where public confidence and proper professional standards must be maintained, the Committee concluded that erasure was the appropriate and proportionate sanction.

185. The Committee therefore directs that the Registrant's name is erased from the register of student Dispensing Opticians.

Immediate Order


186. Ms Simpeh, on behalf of the Council, made an application for an immediate order of suspension to cover the appeal period, in accordance with Section 13I of the Opticians Act 1989. She submitted that an immediate interim order was necessary to protect the public and the wider public interest having regards to the Committee's findings on misconduct and impairment. Ms Simpeh informed the Committee that the Registrant was currently the subject of an interim suspension order which was due to expire on or around 29 March 2025.

187. The Committee accepted the advice of the Legal Adviser who said that the decision was a matter for the Committee's own professional judgement.

188. The Committee decided to impose an immediate order of suspension having regard to its findings. It determined that it was necessary for the protection of the

public and in the wider public interest. The Committee revoked the current interim order and imposed a suspension order.

Chair of the Committee: Graham White

Signature 

Date: 12 June 2024

Registrant: Naseem Suleman

Signaturesent via email.....

Date: 12 June 2024

FURTHER INFORMATION
Transcript
A full transcript of the hearing will be made available for purchase in due course.
Appeal
Any appeal against an order of the Committee must be lodged with the relevant court within 28 days of the service of this notification. If no appeal is lodged, the order will take effect at the end of that period. The relevant court is shown at section 23G(4)(a)-(c) of the Opticians Act 1989 (as amended).
Professional Standards Authority
<p>This decision will be reported to the Professional Standards Authority (PSA) under the provisions of section 29 of the NHS Reform and Healthcare Professions Act 2002. PSA may refer this case to the High Court of Justice in England and Wales, the Court of Session in Scotland or the High Court of Justice in Northern Ireland as appropriate if they decide that a decision has been insufficient to protect the public and/or should not have been made, and if they consider that referral is desirable for the protection of the public.</p> <p>Where a registrant can appeal against a decision, the Authority has 40 days beginning with the day which is the last day in which you can appeal. Where a registrant cannot appeal against the outcome of a hearing, the Authority's appeal period is 56 days beginning with the day in which notification of the decision was served on you. PSA will notify you promptly of a decision to refer. A letter will be sent by recorded delivery to your registered address (unless PSA has been notified by the GOC of a change of address).</p> <p>Further information about the PSA can be obtained from its website at www.professionalstandards.org.uk or by telephone on 020 7389 8030.</p>
Effect of orders for suspension or erasure
To practise or carry on business as an optometrist or dispensing optician, to take or use a description which implies registration or entitlement to undertake any activity which the law restricts to a registered person, may amount to a criminal offence once an entry in the register has been suspended or erased.
Contact
If you require any further information, please contact the Council's Hearings Manager at 10 Old Bailey, London, EC4M 7NG or, by telephone, on 020 7580 3898.