

Miss Sara Williams: Professional conduct panel outcome

Panel decision and reasons on behalf of the Secretary of State for Education

October 2021

Contents

Introduction	3
Allegations	4
Preliminary applications	4
Summary of evidence	5
Documents	5
Witnesses	5
Decision and reasons	6
Findings of fact	9
Panel's recommendation to the Secretary of State	10
Decision and reasons on behalf of the Secretary of State	13

Professional conduct panel decision and recommendations, and decision on behalf of the Secretary of State

Teacher: Miss Sara Williams

Teacher ref number: 1677181

Teacher date of birth: 13 April 1985

TRA reference: 19417

Date of determination: 18 October 2021

Former employer: Normandy Primary School part of the Pelham Academy Trust,

Bexleyheath

Introduction

A professional conduct panel ("the panel") of the Teaching Regulation Agency ("the TRA") convened on 18 October 2021 by way of a virtual hearing to consider the case of Miss Sara Williams.

The panel members were Mr Steve Woodhouse (teacher panellist – in the chair), Ms Caroline Downes (lay panellist) and Mr Alf Bean (lay panellist).

The legal adviser to the panel was Ms Josie Beal of Birketts LLP solicitors.

The presenting officer for the TRA was Ms Fallon Alexis of QEB Hollis Whiteman.

Miss Williams was not present and was not represented.

The hearing took place by way of a virtual hearing in public and was recorded.

Allegations

The panel considered the allegations set out in the notice of proceedings dated 9 August 2021.

It was alleged that Miss Williams was guilty of unacceptable professional conduct and/or conduct that may bring the profession into disrepute, in that whilst employed by Normandy Primary School:

- 1. On or around 2 December 2019, she attended school whilst under the influence of alcohol.
- 2. On or around 4 February 2020, she attended school whilst under the influence of alcohol.
- 3. On or around 4 February 2020, she brought alcohol onto the school premises.
- 4. On or around 4 February 2020, she failed to identify that one or more pupils attending a school trip had not returned their parent/carer's permission slip.
- 5. Her actions outlined in one or more of the above paragraphs constituted a safety risk to one or more pupils.

Miss Williams admitted the facts of the allegations, as set out in the response to the notice of the referral, signed on behalf of Miss Williams by Ms Susanna Thompson of NASUWT (Miss Williams' former representative) on 12 May 2021.

Miss Williams further admitted that the facts of the allegations amounted to unacceptable professional conduct and/or conduct that may bring the profession into disrepute.

Preliminary applications

Application to proceed in the absence of the teacher

Miss Williams was not present at the hearing nor was she represented. The presenting officer made an application to proceed in the absence of Miss Williams.

The panel accepted the legal advice provided in relation to this application and took account of the various factors referred to it, as derived from the guidance set down in the case of *R v Jones* [2003] 1 AC 1 (as considered and applied in subsequent cases, particularly *GMC v Adeogba*).

The panel was satisfied that the notice of proceedings had been sent to Miss Williams in accordance with the Teacher Misconduct: Disciplinary Procedures for the Teaching Profession 2020 (the "Procedures").

The panel concluded that Miss Williams' absence was voluntary and that she was aware that the matter would proceed in her absence. The presenting officer had attempted to contact Miss Williams via her former representative and directly via post, email and telephone.

The panel noted that Miss Williams had not sought an adjournment to the hearing and the panel did not consider that an adjournment would procure her attendance at a hearing. There was no medical evidence before the panel that Miss Williams was unfit to attend the hearing. The panel considered that it was in the public interest for the hearing to take place.

Having decided that it was appropriate to proceed, the panel agreed to seek to ensure that the proceedings were as fair as possible in the circumstances, bearing in mind that Miss Williams was neither present nor represented.

Part of the hearing to be heard in private

Whilst there was no formal application for part of the hearing to be heard in private, it was noted that the bundle of documents before it contained information relating to [REDACTED]. The panel and the presenting officer agreed that any matters relating to [REDACTED] health should be heard in private, if applicable.

Summary of evidence

Documents

In advance of the hearing, the panel received a bundle of documents which included:

- Section 1: Chronology, anonymised pupil list and list of key people pages 1 to 2
- Section 2: Notice of referral response, statement of agreed facts, virtual hearing application and notice of proceedings and response – pages 3 to 21
- Section 3: Teaching Regulation Agency witness statements pages 22 to 114
- Section 4: Teacher documents pages 115 to 116
- Section 5: Correspondence page 117 to 128

The panel members confirmed that they had read all of the documents within the bundle, in advance of the hearing.

Witnesses

No witnesses were called to give oral evidence at the hearing.

Decision and reasons

The panel announced its decision and reasons as follows:

The panel carefully considered the case before it and reached a decision.

In summary, Miss Williams was employed as a teacher by Normandy Primary School ('the School') from 1 September 2017.

On 2 December 2019, Miss Williams attended the School under the influence of alcohol, and admitted to being under the influence of alcohol. The School took advice from the Local Authority Designated Officer ('LADO') and occupational health and a risk assessment was put in place to seek to support Miss Williams.

On 4 February 2020 concerns were raised by members of staff regarding Miss Williams, and the leadership and organisation of a school trip.

On 6 February 2020 an internal investigation commenced and Miss Williams was suspended pending an outcome.

The matter was referred to the TRA on 20 July 2020.

Findings of fact

The findings of fact are as follows:

The panel was aware that there was hearsay evidence in the hearing bundle. The panel noted that hearsay evidence was admissible in civil proceedings but that it should be recognised as hearsay and the panel should determine the weight to be placed on it. In the absence of any oral witness evidence, the panel considered all of the evidence in the bundle. In particular, it found that the evidence presented as part of the School's disciplinary process was consistent with the admissions made by Miss Williams' in her response to the notice of referral (sent via her representative).

The panel found the following particulars of the allegations against you proved, for these reasons:

1. On or around 2 December 2019, you attended school whilst under the influence of alcohol.

The panel noted that within the response to the notice of referral, signed on behalf of Miss Williams by Ms Susanna Thompson of NASUWT (Miss Williams' former representative) on 12 May 2021, Miss Williams admitted the facts of allegation 1. Furthermore, a letter from NASUWT dated 20 January 2021, confirmed that Miss Williams did not deny the facts of allegation 1.

Notwithstanding this, the panel made its own determination on the facts of the allegation on all of the evidence before it.

The panel was of the view that, save for Miss Williams' admission in the response to the notice of referral and the correspondence from her representative, there was limited information within the bundle in respect of this allegation. However, the panel accepted that, following this incident, a risk assessment was put in place and Miss Williams was referred to an occupational health service. Given Miss Williams' admission in the response to the notice of referral, the panel found the facts of allegation 1 proved.

2. On or around 4 February 2020, you attended school whilst under the influence of alcohol.

The panel noted that within the response to the notice of referral, signed on behalf of Miss Williams by Ms Susanna Thompson of NASUWT (Miss Williams' former representative) on 12 May 2021, Miss Williams admitted the facts of allegation 2. Furthermore, a letter from NASUWT dated 20 January 2021, confirmed that Miss Williams did not deny the facts of allegation 2.

Notwithstanding this, the panel made its own determination on the facts of the allegation on all of the evidence before it.

The panel considered the investigation report prepared by the School and the statements and information provided as part of the School's disciplinary process. Statements from members of staff at the School indicated that, on 4 February 2020 whilst at school, Miss Williams smelt of alcohol, was "shouty" and/or "screechy" and did not appear to be concentrating and/or seemed "vague" or "dreamy".

During the School's investigation meeting on 27 February 2020 and 3 March 2020, Miss Williams admitted that she had been drinking the night before the school trip on 4 February 2020. Miss Williams also stated that, when she came into school that morning (4 February 2020), she believed she was still under the influence of alcohol.

The panel found the facts of allegation 2 proved.

3. On or around 4 February 2020, you brought alcohol onto the school premises.

The panel noted that within the response to the notice of referral, signed on behalf of Miss Williams by Ms Susanna Thompson of NASUWT (Miss Williams' former representative) on 12 May 2021, Miss Williams admitted the facts of allegation 3. Furthermore, a letter from NASUWT dated 20 January 2021, confirmed that Miss Williams did not deny the facts of allegation 3.

Notwithstanding this, the panel made its own determination on the facts of the allegation on all of the evidence before it.

The panel considered the investigation report prepared by the School and the statements and information provided as part of the School's disciplinary process. Statements from members of staff at the School indicated that Miss Williams had a bottle in her bag (on the School's premises) that contained liquid, which smelt like wine.

During the School's investigation meeting on 27 February 2020 and 3 March 2020, when Miss Williams was asked if she had drunk alcohol whilst on school premises on 4 February 2020, she replied: "I did not drink in school that day but I did have alcohol in my bag that day."

The panel found the facts of allegation 3 proved.

4. On or around 4 February 2020, you failed to identify that one or more pupils attending a school trip had not returned their parent/carer's permission slip.

The panel noted that within the response to the notice of referral, signed on behalf of Miss Williams by Ms Susanna Thompson of NASUWT (Miss Williams' former representative) on 12 May 2021, Miss Williams admitted the facts of allegation 4. Furthermore, a letter from NASUWT dated 20 January 2021, confirmed that Miss Williams did not deny the facts of allegation 4.

Notwithstanding this, the panel made its own determination on the facts of the allegation on all of the evidence before it.

The panel considered the investigation report prepared by the School and the statements and information provided as part of the School's disciplinary process. Statements from members of staff at the School indicated that Miss Williams' paperwork in respect of the school trip was muddled and that she did not have permission slips for all of the pupils who were marked as attending the trip.

The panel found the facts of allegation 4 proved.

5. Your actions outlined in one or more of the above paragraphs constituted a safety risk to one or more pupils

The panel noted that within the response to the notice of referral, signed on behalf of Miss Williams by Ms Susanna Thompson of NASUWT (Miss Williams' former representative) on 12 May 2021, Miss Williams admitted the facts of allegation 5. Furthermore, a letter from NASUWT dated 20 January 2021, confirmed that Miss Williams accepted allegation 5.

Notwithstanding this, the panel made its own determination on the facts of the allegation on all of the evidence before it.

The panel was of the view that attending school whilst under the influence of alcohol, bringing alcohol onto school premises and failing to ensure that pupils attending a school

trip had returned their parent/carer's permission slip constituted a safety risk to one or more pupils. In particular, the panel considered that if Miss Williams had attended the school trip on 4 February 2020, and been responsible for pupils whilst under the influence of alcohol, this would have been a significant safety risk.

The panel found the facts of allegation 5 proved.

In respect of all of the allegations, the panel noted that Miss Williams stated she felt unprepared to take on the role of music lead, due to her lack of experience (being a relatively newly qualified teacher), and felt under pressure. The panel appreciated that Miss Williams had been given the responsibility of music lead, leading the school trip and the school choir. The panel also understood that Miss Williams was [REDACTED]. Whilst the panel sympathised with all of these factors, it did not consider that they changed the panel's findings in respect of the allegations.

Findings as to unacceptable professional conduct and/or conduct that may bring the profession into disrepute

Having found all of the allegations proved, the panel went on to consider whether the facts of those proved allegations amounted to unacceptable professional conduct and/or conduct that may bring the profession into disrepute.

In doing so, the panel had regard to the document Teacher Misconduct: The Prohibition of Teachers, which is referred to as "the Advice".

The panel was satisfied that the conduct of Miss Williams in relation to the facts found proved, involved breaches of the Teachers' Standards. The panel considered that, by reference to Part 2, Miss Williams was in breach of the following standards:

- Teachers uphold public trust in the profession and maintain high standards of ethics and behaviour, within and outside school, by
 - having regard for the need to safeguard pupils' well-being, in accordance with statutory provisions
- Teachers must have proper and professional regard for the ethos, policies and practices of the school in which they teach.
- Teachers must have an understanding of, and always act within, the statutory frameworks which set out their professional duties and responsibilities.

The panel was satisfied that the conduct of Miss Williams amounted to misconduct of a serious nature which fell significantly short of the standards expected of the profession.

The panel was of the view that attending school under the influence of alcohol or bringing alcohol onto school premises was hugely inappropriate, in particular in circumstances

where a teacher was expected to be in charge of an external school trip. Whilst the School took action and prevented Miss Williams from attending the school trip, the panel was concerned about the potential implications had Miss Williams attended the trip whilst under the influence of alcohol and with alcohol in her bag.

The panel also considered whether Miss Williams' conduct displayed behaviours associated with any of the offences listed on pages 10 and 11 of the Advice, but found that none of these offences were relevant.

Accordingly, the panel was satisfied that Miss Williams was guilty of unacceptable professional conduct.

The panel took into account the way the teaching profession is viewed by others and considered the influence that teachers may have on pupils, parents and others in the community. The panel was of the view that parents, pupils and members of the public would not expect a teacher to attend school under the influence of alcohol, bring alcohol onto school premises or fail to ensure that pupils who were to attend a school trip had provided parent/carer permission slips.

The panel also took account of the uniquely influential role that teachers can hold in pupils' lives and the fact that pupils must be able to view teachers as role models in the way that they behave. The panel did not consider that Miss Williams had acted as a role model by being under the influence of alcohol and/or in possession of alcohol whilst responsible for pupils.

The findings of misconduct are serious, and the conduct displayed would be likely to have a negative impact on the individual's status as a teacher, potentially damaging the public perception.

The panel therefore found that Miss Williams' actions constituted conduct that may bring the profession into disrepute.

Having found the facts of allegations 1 to 5 proved, the panel further found that Miss Williams' conduct amounted to both unacceptable professional conduct and conduct that may bring the profession into disrepute.

Panel's recommendation to the Secretary of State

Given the panel's findings in respect of unacceptable professional conduct and conduct that may bring the profession into disrepute, it was necessary for the panel to go on to consider whether it would be appropriate to recommend the imposition of a prohibition order by the Secretary of State.

In considering whether to recommend to the Secretary of State that a prohibition order should be made, the panel had to consider whether it would be an appropriate and proportionate measure, and whether it would be in the public interest to do so.

The panel were aware that prohibition orders should not be given in order to be punitive, or to show that blame has been apportioned, although they are likely to have punitive effect.

The panel had regard to the particular public interest considerations set out in the Advice and, having done so, found a number of them to be relevant in this case, namely: the protection of pupils, the maintenance of public confidence in the profession and declaring and upholding proper standards of conduct.

In the light of the panel's findings against Miss Williams, which involved being under the influence of alcohol whilst on school premises, and bringing alcohol onto school premises, there was a strong public interest consideration in respect of the protection of pupils.

Similarly, the panel considered that public confidence in the profession could be seriously weakened if conduct such as that found against Miss Williams was not treated with the utmost seriousness when regulating the conduct of the profession.

The panel was of the view that a strong public interest consideration in declaring proper standards of conduct in the profession was also present as the conduct found against Miss Williams was outside that which could reasonably be tolerated.

The panel decided that there was a public interest consideration in retaining the teacher in the profession, since (save for the allegations in front of the panel) no doubt had been cast upon her abilities as an educator and/or her ability to contribute to the teaching profession, particularly given that she was in the early stages of her career at the School.

In view of the clear public interest considerations that were present, the panel considered carefully whether or not it would be proportionate to impose a prohibition order, taking into account the effect that this would have on Miss Williams.

In carrying out the balancing exercise, the panel had regard to the public interest considerations both in favour of, and against, prohibition as well as the interests of Miss Williams. The panel took further account of the Advice, which suggests that a prohibition order may be appropriate if certain behaviours of a teacher have been proved. In the list of such behaviours, those that were relevant in this case were:

 serious departure from the personal and professional conduct elements of the Teachers' Standards; misconduct seriously affecting the education and/or well-being of pupils, and particularly where there is a continuing risk.

Even though some of the behaviour found proved in this case indicated that a prohibition order would be appropriate, the panel went on to consider the mitigating factors. Mitigating factors may indicate that a prohibition order would not be appropriate or proportionate.

There was no evidence that Miss Williams' actions were not deliberate. There was no evidence to suggest that Miss Williams was acting under duress.

[REDACTED]

Following the incident on 2 December 2019, the School had put a risk assessment in place to seek to support Miss Williams when she became [REDACTED].

The documents also indicated that Miss Williams was [REDACTED]. In addition, Miss Williams was a recently qualified teacher and was given more responsibility within the school, including the role of music lead. This was a sole responsibility role, with no shadow lead or supporting member of staff.

The letter from Miss Williams' representative states that she has taken time to address her [REDACTED].

The panel sympathised with Miss Williams and the circumstances that lead to the incidents in December 2019 and February 2020. However, the panel was concerned that, despite some support mechanisms being put in place by the School after the first incident, the second incident occurred in a matter of months. This demonstrated to the panel that there may have been a lack of learning on Miss Williams' part, or the potential for this issue to reoccur. The panel was further concerned that Miss Williams had initially denied being under the influence of alcohol when asked by the School on 4 February 2020. However, it noted that she had been honest since then.

The panel considered that it would have benefitted from additional evidence in respect of mitigation and from hearing oral evidence from Miss Williams to enable it to fully assess insight, mitigation and the likelihood of her conduct reoccurring.

The panel first considered whether it would be proportionate to conclude this case with no recommendation of prohibition, considering whether the publication of the findings made by the panel would be sufficient.

The panel was of the view that, applying the standard of the ordinary intelligent citizen, it would not be a proportionate and appropriate response to recommend no prohibition order. Recommending that the publication of adverse findings would be sufficient would

unacceptably compromise the public interest considerations present in this case, despite the severity of the consequences for Miss Williams of prohibition.

The panel was of the view that prohibition was both proportionate and appropriate. The panel decided that the public interest considerations outweighed the interests of Miss Williams. The fact that Miss Williams' conduct constituted a serious departure from the Teachers' Standards was a significant factor in forming that opinion. Accordingly, the panel made a recommendation to the Secretary of State that a prohibition order should be imposed with immediate effect.

The panel went on to consider whether or not it would be appropriate for it to decide to recommend a review period of the order. The panel was mindful that the Advice states that a prohibition order applies for life, but there may be circumstances, in any given case, that may make it appropriate to allow a teacher to apply to have the prohibition order reviewed after a specified period of time that may not be less than 2 years.

The Advice indicates that there are behaviours that, if proved, would militate against the recommendation of a review period. The panel found that Miss Williams was not responsible for any of these behaviours.

The panel decided that the findings indicated a situation in which a review period would be appropriate and, as such, decided that it would be proportionate, in all the circumstances, for the prohibition order to be recommended with provisions for a 2 year review period. The panel considered that this allowed sufficient time for Miss Williams to demonstrate the steps she has taken since her misconduct occurred, and to communicate her insight and mitigation. The panel was mindful that Miss Williams was an inexperienced teacher at the time the misconduct occurred, and that she was [REDACTED]. The panel was of the view that the School should have provided Miss Williams with more support and/or reviewed the decision to give her the responsibility of leading the school trip given the recent circumstances and her level of experience. The panel concluded that it would be proportionate for Miss Williams to have the opportunity to apply to set aside any prohibition order after a period of 2 years.

Decision and reasons on behalf of the Secretary of State

I have given very careful consideration to this case and to the recommendation of the panel in respect of both sanction and review period.

In considering this case, I have also given very careful attention to the Advice that the Secretary of State has published concerning the prohibition of teachers.

In this case, the panel has found all of the allegations proven and found that those proven facts amount to unacceptable professional conduct and conduct that may bring the profession into disrepute.

The panel has made a recommendation to the Secretary of State that Miss Sara Williams should be the subject of a prohibition order, with a review period of two years.

In particular, the panel has found that Miss Williams is in breach of the following standards:

- Teachers uphold public trust in the profession and maintain high standards of ethics and behaviour, within and outside school, by
 - having regard for the need to safeguard pupils' well-being, in accordance with statutory provisions
- Teachers must have proper and professional regard for the ethos, policies and practices of the school in which they teach.
- Teachers must have an understanding of, and always act within, the statutory frameworks which set out their professional duties and responsibilities.

The panel finds that the conduct of Miss Williams fell significantly short of the standards expected of the profession.

The findings of misconduct are serious as they include a finding being under the influence of alcohol on school premises, bringing alcohol onto school premises and actions that could have led to a safety concern for pupils.

I have to determine whether the imposition of a prohibition order is proportionate and in the public interest. In considering that for this case, I have considered the overall aim of a prohibition order which is to protect pupils and to maintain public confidence in the profession. I have considered the extent to which a prohibition order in this case would achieve that aim taking into account the impact that it will have on the individual teacher. I have also asked myself, whether a less intrusive measure, such as the published finding of unacceptable professional conduct and conduct that may bring the profession into disrepute, would itself be sufficient to achieve the overall aim. I have to consider whether the consequences of such a publication are themselves sufficient. I have considered therefore whether or not prohibiting Miss Williams, and the impact that will have on her, is proportionate and in the public interest.

In this case, I have considered the extent to which a prohibition order would protect children. The panel has observed, "the panel considered that if Miss Williams had attended the school trip on 4 February 2020, and been responsible for pupils whilst under the influence of alcohol, this would have been a significant safety risk." A prohibition order would therefore prevent such a risk from being present in the future.

I have also taken into account the panel's comments on insight and remorse, which the panel sets out as follows, "The letter from Miss Williams' representative states that she has taken time to address her [REDACTED]" The panel also commented "it would have

benefitted from additional evidence in respect of mitigation and from hearing oral evidence from Miss Williams to enable it to fully assess insight, mitigation and the likelihood of her conduct reoccurring." In my judgement, the lack of full insight means that there is some risk of the repetition of this behaviour and this puts at risk future pupils' safety. I have therefore given this element considerable weight in reaching my decision.

I have gone on to consider the extent to which a prohibition order would maintain public confidence in the profession and the panel observe, "a strong public interest consideration in declaring proper standards of conduct in the profession was also present as the conduct found against Miss Williams was outside that which could reasonably be tolerated."

I have had to consider that the public has a high expectation of professional standards of all teachers and that the public might regard a failure to impose a prohibition order as a failure to uphold those high standards. In weighing these considerations, I have had to consider the matter from the point of view of an "ordinary intelligent and well-informed citizen."

I have considered whether the publication of a finding of unacceptable professional conduct, in the absence of a prohibition order, can itself be regarded by such a person as being a proportionate response to the misconduct that has been found proven in this case.

I have also considered the impact of a prohibition order on Miss Williams herself "The panel decided that there was a public interest consideration in retaining the teacher in the profession, since (save for the allegations in front of the panel) no doubt had been cast upon her abilities as an educator and/or her ability to contribute to the teaching profession, particularly given that she was in the early stages of her career at the School." A prohibition order would prevent Miss Williams from teaching. A prohibition order would also clearly deprive the public of her contribution to the profession for the period that it is in force.

In this case, I have placed considerable weight on the panel's comments concerning mitigation, along with the risk of repetition. The panel has said, "The panel sympathised with Miss Williams and the circumstances that lead to the incidents in December 2019 and February 2020. However, the panel was concerned that, despite some support mechanisms being put in place by the School after the first incident, the second incident occurred in a matter of months. This demonstrated to the panel that there may have been a lack of learning on Miss Williams' part, or the potential for this issue to reoccur."

I have given less weight in my consideration of sanction therefore, to the contribution that Miss Williams has made to the profession. In my view, it is necessary to impose a prohibition order in order to maintain public confidence in the profession. A published decision, in light of the circumstances in this case, that is not fully evidenced by remorse

or insight, does not in my view satisfy the public interest requirement concerning public confidence in the profession.

For these reasons, I have concluded that a prohibition order is proportionate and in the public interest in order to achieve the intended aims of a prohibition order.

I have gone on to consider the matter of a review period. In this case, the panel has recommended a 2 year review period.

I have considered the panel's comments "The panel considered that this allowed sufficient time for Miss Williams to demonstrate the steps she has taken since her misconduct occurred, and to communicate her insight and mitigation. The panel was mindful that Miss Williams was an inexperienced teacher at the time the misconduct occurred, and that she was [REDACTED]. The panel was of the view that the School should have provided Miss Williams with more support and/or reviewed the decision to give her the responsibility of leading the school trip given the recent circumstances and her level of experience."

I have considered whether a 2 year review period reflects the seriousness of the findings and is a proportionate period to achieve the aim of maintaining public confidence in the profession and in this case I have determined it does.

This means that Miss Sara Williams is prohibited from teaching indefinitely and cannot teach in any school, sixth form college, relevant youth accommodation or children's home in England. She may apply for the prohibition order to be set aside, but not until 28 October 2023, 2 years from the date of this order at the earliest. This is not an automatic right to have the prohibition order removed. If she does apply, a panel will meet to consider whether the prohibition order should be set aside. Without a successful application, Miss Sara Williams remains prohibited from teaching indefinitely.

This order takes effect from the date on which it is served on the teacher.

Miss Sara Williams has a right of appeal to the Queen's Bench Division of the High Court within 28 days from the date she is given notice of this order.

Decision maker: Sarah Buxcey

Date: 21 October 2021

This decision is taken by the decision maker named above on behalf of the Secretary of State.