



Teaching  
Regulation  
Agency

# **Miss Angela Hughes: Professional conduct panel outcome**

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

**November 2023**

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

<b>Teacher:</b>	Miss Angela Hughes
<b>Teacher ref number:</b>	1283004
<b>Teacher date of birth:</b>	29 November 1974
<b>TRA reference:</b>	18403
<b>Date of determination:</b>	2 November 2023
<b>Former employer:</b>	SS Peter and Paul's Catholic Primary School, Ilford

### **Introduction**

A professional conduct panel (“the panel”) of the Teaching Regulation Agency (“the TRA”) convened virtually on 30 October 2023 to 2 November 2023, to consider the case of Miss Angela Hughes.

The panel members were Mr Terry Hyde (former teacher panellist – in the chair), Ms Jo Palmer-Tweed (teacher panellist) and Ms Debra Vaughan (lay panellist).

The legal adviser to the panel was Mr Ben Schofield of Blake Morgan LLP.

The presenting officer for the TRA was Ms Holly Quirk of Brown Jacobson LLP.

Miss Hughes was present and was not represented.

The hearing took place in public (save for parts of the evidence considered in private) and was recorded.

## Allegations

The panel considered the allegations set out in the notice of proceedings dated 7 August 2023.

It was alleged that Miss Hughes was guilty of unacceptable professional conduct and/or conduct that may bring the profession into disrepute, in that whilst employed at SS Peter and Paul's Catholic Primary School, between 1 September 2016 and 15 February 2019, she:

1. Between September 2016 and October 2018 engaged in inappropriate and/or unprofessional behaviour on one or more occasions towards one or more pupils, including by:

- a. On or around 24 September 2018, she dragged and/or pulled one or more pupils to a different area of the Nursery, by their arm;
- b. On one or more occasions, she used inappropriate language when referring to pupils including:
  - i. 'little gits' and/or 'little shits'
  - ii. Referring to a pupil as 'thick'
  - iii. Stating 'could you get him out of my face before I do some serious damage' when referring to a pupil.
- c. On one or more occasions, she shouted at one or more pupils;
- d. On one or more occasions in or around, September 2018, she snatched a toy and/or toybox from one or more pupils.

2. She failed to take appropriate action and/or ensure appropriate action was taken to safeguard pupils by, on one or more occasions, condoning children being knocked on the back of the knee by another member of staff, so they fell.

In a statement of agreed facts, Miss Hughes denied the allegations.

## Preliminary applications

### Admission of late documents

At the start of the hearing, the panel accepted into the evidence, a six page statement of agreed facts between the parties.

### Privacy

The TRA highlighted that parts of the evidence might touch on [REDACTED] and that the panel may wish to consider those discrete elements of the evidence in private. This

position was not opposed by Miss Hughes. The panel agreed that those elements of the evidence should be heard in private.

## Summary of evidence

### Documents

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

Section 1: Index, chronology and anonymised pupil list – pages 1 to 6

Section 2: Notice of proceedings and response – pages 7 to 16

Section 3: Teaching Regulation Agency witness statements – pages 18 to 29

Section 4: Teaching Regulation Agency documents – pages 30 to 162

Section 5: Teacher documents – pages 163 to 171

In addition, the panel agreed to accept the following:

Statement of agreed facts – pages 172 to 177

The panel members confirmed that they had read all of the documents within the bundle, in advance of the hearing and the additional document that the panel decided to admit.

### Witnesses

The panel heard oral evidence from:

- Witness A ([REDACTED]);
- Witness B ([REDACTED]);
- Witness C ([REDACTED]);
- Witness D ([REDACTED]);
- Miss Angela Hughes (the teacher).

## Decision and reasons

The panel announced its decision and reasons as follows:

The panel carefully considered the case before it and reached a decision. Whilst the panel has considered all of the evidence before it, not every piece of evidence has been referred to in these reasons.

Miss Hughes was employed at SS Peter and Paul's Catholic Primary School (the "School") as a nursery teacher from 1 September 2016. The children in her class were 'pre-school' and would have been aged three to four years old. This was Miss Hughes' second teaching post following her qualification as a teacher in July 2016.

On 24 September 2018, a parent of one of the children in Miss Hughes' class raised a concern to the School's [REDACTED] about the way she saw Miss Hughes physically handling one of the children in the class.

As a result of this, the School started an investigation. This incident and other concerns raised were looked into. Miss Hughes left the employment of the School following the conclusion of that investigatory process in February 2019. In May 2019, the School made a referral to the TRA regarding Miss Hughes' conduct, which has resulted in this hearing.

## **Findings of fact**

The findings of fact are as follows:

### **1. Between September 2016 and October 2018 engaged in inappropriate and/or unprofessional behaviour on one or more occasions towards one or more pupils, including by:**

#### **a. On or around 24 September 2018, you dragged and/or pulled one or more pupils to a different area of the Nursery, by their arm;**

Witness C's evidence was that a number of her children had previously attended the School. Her youngest child had [REDACTED] in Miss Hughes' class that [REDACTED]. At around 11:30-11:45am on [REDACTED], Witness C was standing outside the nursery waiting to collect her child at the end of the morning. She stated that she looked through the glass doors of the nursery and could see through to the other side where there was an outdoor garden used by the nursery.

Witness C stated that she saw Miss Hughes 'grab' a child by their arm and pull them into the nursery room from the garden. Witness C further stated, shortly after seeing this, she witnessed Miss Hughes 'grab' another child by the arm and also pull them into the nursery room. Witness C described the two children as just playing like the rest of the children before Miss Hughes physically handled them.

At this time, Witness C was standing next to Witness D whilst both were looking into the classroom. She asked Witness D if she 'saw what I just saw', and Witness D confirmed she did. Witness C stated she then reported it to the [REDACTED] who asked her to provide a written statement of what she had seen.

Before the panel was a copy of a letter written by Witness C. It was dated [REDACTED] and was also stamped 'RECEIVED [REDACTED]'. It was addressed to Witness A and stated that:

*"Miss Hughs [sic] had grabbed a child by the arm and pulled them away towards her. At that point I felt sick to my stomach and full of fear because does this happen to my child on a daily basis. This has really upset and scared me in equal measures and now my confidence in your nursery staff has gone."*

Witness C also stated that she informed the [REDACTED] that Witness D had seen the events.

Witness D's evidence was that her child was in Miss Hughes' class, and she had attended the nursery to pick them up at the end of that morning. She was standing outside the nursery doors talking with other parents. Witness D stated that she saw Miss Hughes approaching the garden area towards a child who was holding onto a toy trolley. She then described seeing Miss Hughes harshly take the trolley away from the child and drag the child back inside to the nursery room. She understood that Witness C was going to raise the issue with the [REDACTED]. In the following days, the [REDACTED] contacted her and she provided a written letter which stated:

*"With great shock and sadness we saw a member of nursery staff grab hold of another child[']s hand and drag her into the nursery carpet area. Within another few minutes I observed that the same member of staff again harshly took a trolley of some sort from another child and again dragged this child into the carpet area."*

In her evidence, Witness A stated that on [REDACTED] she received a phone call from Witness C who explained that she had been waiting outside of the School and had seen a concerning incident in the nursery garden through the window. Witness A explained that Witness C described that she saw Miss Hughes being rough with a child grabbing and pulling them. Witness A agreed that Witness C would put in writing what she had seen. Witness C told her that Witness D had also witnessed the event. Witness A stated she had spoken with Witness D on 24 September 2018 and also asked her to provide a written account.

Both parents' letters included a diagram setting out that they had seen Miss Hughes pulling a child by their arm in the nursery garden area and Witness C indicated that the second child who she had seen being pulled by Miss Hughes was just inside the garden door.

In a disciplinary investigatory meeting on 7 November 2018, Miss Hughes was recorded as saying that she could not understand how any parent could have a clear view into the nursery garden from outside. In her written statement to the TRA, Miss Hughes explained that one of the children had refused to move after hurting another child. However, in her

oral evidence before the panel, Miss Hughes stated that she had needed to intervene as two children were fighting each other.

In assessing this evidence the panel took into account the passage of time since the date of these events. On that basis, the panel placed significant weight on the contemporaneous accounts provided at the time. The panel considered that the evidence of Witness C and Witness D had a level of consistency between each of their accounts and with the surrounding evidence of the [REDACTED]. The panel noted that Mrs Hughes' account had evolved over time, including at this hearing that she was intervening in two children fighting, which had not been previously mentioned in her accounts. The panel considered this explanation as unlikely, taking into account the evidence of Witness C and Witness D who described the children as behaving unremarkably before Miss Hughes grabbed them.

Accordingly, based on this evidence the panel was satisfied that it was more likely than not that Miss Hughes had grabbed more than one pupil by the arm to bring them back into the nursery room at the end of the morning, rather than to prevent fights between them. The panel considered such actions inappropriate and unprofessional as a method of controlling the movements of children around the nursery environment.

Therefore, the panel found this allegation proved.

**b. On one or more occasions, you used inappropriate language when referring to pupils including:**

**i. 'little gits' and/or 'little shits'**

**ii. Referring to a pupil as 'thick'**

**iii. Stating 'could you get him out of my face before I do some serious damage' when referring to a pupil.**

Witness B was [REDACTED] at the School and had been there since [REDACTED]. In her evidence she described how she worked closely with Miss Hughes on a daily basis. She stated that on one occasion, whilst in the nursery, she overheard Miss Hughes saying to Individual E ([REDACTED]) that the children were 'little shits' and 'little gits'. She said the comments weren't directly aimed at the children, but the children were within earshot when Miss Hughes made them.

Witness B described another occasion when she was discussing a specific pupil with Miss Hughes and explaining she was looking forward to him progressing through the school. Witness B said that Miss Hughes responded along the lines of 'it's never going to happen he's thick'. Again Witness B was concerned that this was said within earshot of the children in the nursery.



Witness B also gave evidence that on more than one occasion Miss Hughes said to other staff members words to the effect of 'to get children out of her face before she did some serious damage'.

Before the panel, was information from the School's investigation which suggested that when Individual E was interviewed during that process she confirmed that lots of derogatory language was used about the children in the nursery. It was noted that Individual E stated that both she and Miss Hughes would refer to the children as 'little shits' and that she had heard Miss Hughes use the word 'git'.

Miss Hughes denied these instances. She explained that Witness B had made these allegations up about her as they did not have a good working relationship. She accepted that she may have referred to children as 'little gits' but this would have only been in a social situation not in the classroom.

The panel considered that Witness B's recollection was reliable in regards to these events, as she readily conceded parts she could not fully recall and was able to link certain events and attribute reasons as to why she could remember specific details about other instances. Whilst Individual E was not before the panel to give oral evidence and therefore her remarks in the documentary evidence were hearsay, the panel considered her account lent support to the reliability of Witness B's account.

Accordingly, the panel considered it was more likely than not that Miss Hughes used the language described in sub-allegations i to iii. The panel considered use of such language, some of which could be described, in part, as overtly threatening to the children, as inappropriate and unprofessional.

Therefore the panel found this allegation proved.

**c. On one or more occasions, you shouted at one or more pupils;**

Witness A explained that on 28 September 2018, she entered the nursery through the garden rather than the main door and that Miss Hughes was not aware that she had entered the nursery. She described that Miss Hughes was shouting at the children in an uncontrolled manner and the children looked frightened as a result.

Witness B stated in her evidence that she would regularly raise her voice in front of the children in the nursery.

Miss Hughes explained that she would raise her voice in front of the children on occasions, but this did not occur on 28 September, but rather on 17 September. She explained that following a [REDACTED] and [REDACTED], she was overwhelmed and about to burst into tears. She denied it was a regular occurrence that she raised her voice at the children.

The panel was satisfied that the accounts of Witness B and Witness A and the surrounding evidence demonstrated how Miss Hughes would interact with the children. This suggested it was more likely than not that, on more than one occasion, Miss Hughes had shouted at the children. The panel considered this was inappropriate and unprofessional as a method of communicating with children of such a young age.

Accordingly the panel found this allegation proved.

**d. On one or more occasions in or around, September 2018, you snatched a toy and/or toybox from one or more pupils.**

In their accounts, both Witness C and Witness D described Miss Hughes pulling away the toybox (or trolley) from one of the children.

Witness A's evidence was that when she entered the nursery on 28 September, she also witnessed Miss Hughes snatching a toybox away from a child and forcibly throwing the toys into the box.

Miss Hughes accepted that on an occasion she did snatch a toybox from a child on 17 September, which occurred whilst she was overwhelmed by her [REDACTED].

The panel considered that the evidence showed it was more likely than not Miss Hughes had snatched toys from more than one pupil during September and therefore the panel found this allegation proved.

**2. You failed to take appropriate action and/or ensure appropriate action was taken to safeguard pupils by, on one or more occasions, condoning children being knocked on the back of the knee by another member of staff, so they fell.**

Witness B's evidence was that on occasions she saw Individual E attempting to get the children to sit down by kicking the back of the children's legs so they fell, albeit it was done in a 'jokey' manner rather than maliciously. She described how Miss Hughes would laugh during these instances.

Miss Hughes' evidence was that she had no concerns regarding Individual E's interactions with the children. She recalled there was one child who she described as a 'drama queen' and who would laugh and roll around on the floor as a result of Individual E's actions.

The panel considered that as Witness B's evidence was credible in other areas, it lent to her reliability in her recollection of these events. Even if Individual E's actions were undertaken in a 'jokey' manner, it was an inappropriate method of enforcing the instructions given to the children. This was particularly as the children, at that age, are unable to distinguish between reality or make believe, so at best this would have been poor modelling. The panel considered that as the senior member of staff in the nursery,

Miss Hughes held the ultimate responsibility for addressing the inappropriate actions of her more junior staff. By not dealing with Individual E' inappropriate actions she failed in her safeguarding duties.

Therefore the panel found this allegation proved.

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

Having found 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 Hughes in relation to the facts found proved, involved breaches of the Teachers' Standards. The panel considered that, by reference to Part 2, Miss Hughes 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
  - treating pupils with dignity, building relationships rooted in mutual respect, and at all times observing proper boundaries appropriate to a teacher's professional position
  - 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 also considered whether Miss Hughes' conduct displayed behaviours associated with any of the offences listed on pages 12 to 14 of the Advice. The Advice indicates that where behaviours associated with such an offence exist, a panel is likely to conclude that an individual's conduct would amount to unacceptable professional conduct. The panel found that none of these offences was relevant.

The panel considered that the evidence demonstrated a regular pattern of behaviour in the presence of children which was not acceptable. The seriousness of these actions was aggravated by the very young age of the children who are more reliant on their teachers and more impressionable than children of an older age.

The panel has considered each of the allegations separately and considered they each cross the threshold into serious misconduct. If the panel had found that Miss Hughes' comments about the children being 'little gits' had taken place away from the children, it would have considered it as being below the threshold. However, as it was within their earshot, the panel considered this factor crossed the threshold into serious misconduct.

In her evidence Miss Hughes asserted that she had not received any positive handling training. The panel considered this was unlikely given the evidence of training given at the School. Nonetheless the panel considered that even without this training a teacher should not consider it as acceptable to move a young child by grabbing or pulling at their arm, or their jumper as Miss Hughes asserted in her evidence in relation to 24 September 2018.

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

Accordingly, the panel was satisfied that Miss Hughes 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 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 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's perception. Parents and the community place their utmost trust in teachers whilst children are in their care. In this case, there was evidence of parents being concerned about leaving their children in the care of the School after seeing Miss Hughes act in the way she did. This was a clear example of how the reputation of the teaching profession might be significantly weakened, if that fundamental trust were broken.

The panel therefore found that Miss Hughes' actions constituted 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. 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;
- declaring and upholding proper standards of conduct;

In the light of the panel's findings against Miss Hughes which involved inappropriate physical handling of pupils, inappropriate verbal communications and failures in safeguarding, there was a public interest consideration in respect of the protection of pupils. Similarly, the panel considered that public confidence in the profession could be weakened if conduct such as that found against Miss Hughes were not treated with the utmost seriousness when regulating the conduct of the profession. The panel was of the view that a public interest consideration in declaring proper standards of conduct in the profession was also present as the conduct found against Miss Hughes was outside that which could reasonably be tolerated.

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 Hughes.

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 Hughes. 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 safeguarding and well-being of pupils, and particularly where there is a continuing risk;
- abuse of position or trust (particularly involving pupils);
- failure in their duty of care towards a child, including exposing a child to risk or failing to promote the safety and welfare of the children (as set out in Part 1 of KCSIE);

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.

The panel considered there was no evidence to suggest that Miss Hughes' actions were not deliberate or that she was acting under duress. Miss Hughes did not provide the panel with any documentary evidence or character references attesting to her abilities as an educator.

Miss Hughes did explain to the panel that although she was not currently working in the education sector, she had continued to keep up to date with good teaching practices.

The panel took into account the evidence of other members of staff from the School, which suggested there were ongoing concerns about Miss Hughes' practice. The panel also took into account the evidence from Witness C who stated that prior to the incident on 24 September 2018, she had no concerns about Miss Hughes and initially had found her to be professional and was reassured that her child would be 'in safe hands'.

Miss Hughes' evidence was that at the time of these allegations, [REDACTED]. The panel considered that Miss Hughes' misconduct could not be categorised as an isolated incident or momentary lapse. The panel had significant concerns about a risk of repetition of such misconduct should Miss Hughes return to the classroom at this point in time.

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 Hughes 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 Hughes. The current risk of repetition of similar misconduct was the 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 two years.

The Advice indicates that there are behaviours that, if proved, would militate against the recommendation of a review period. The panel did not consider any of these factors as being relevant in this case.

The panel considered that Miss Hughes was not incapable of remediating the current risks in this case. The panel envisaged that with clear evidence of an increased understanding of positive handling, behaviour management of pupils and self-regulation in the classroom in line with professional expectations, Miss Hughes might be able to suitably ameliorate those risks.

The panel decided that these 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 provision for a review period after two 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 Hughes should be the subject of a prohibition order, with a review period of two years.

In particular, the panel has found that Miss Hughes 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
  - treating pupils with dignity, building relationships rooted in mutual respect, and at all times observing proper boundaries appropriate to a teacher's professional position
  - 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 Hughes involved breaches of the responsibilities and duties set out in statutory guidance Keeping children safe in education (KCSIE), namely failure in the duty of care towards a child, including exposing a child to risk or failing to promote the safety and welfare of the children (as set out in Part 1 of KCSIE).

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

The findings of misconduct are particularly serious as they include inappropriate physical handling of pupils, inappropriate verbal communications and failures in safeguarding.

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 likely to 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 Hughes, and the impact that will have on the teacher, is proportionate and in the public interest.

In this case, I have considered the extent to which a prohibition order would protect children and safeguard pupils. The panel has observed that “the evidence demonstrated a regular pattern of behaviour in the presence of children which was not acceptable. The seriousness of these actions was aggravated by the very young age of the children who are more reliant on their teachers and more impressionable than children of an older age.” A prohibition order would therefore prevent such a risk from being present in the future.

The panel does not comment directly on whether Miss Hughes showed insight and remorse. However Miss Hughes denied the allegations and the panel said that it “had significant concerns about a risk of repetition of such misconduct should Miss Hughes return to the classroom at this point in time.” In my judgement, the lack of evidence of insight and remorse means that there is some risk of the repetition of this behaviour and this puts at risk the future wellbeing of pupils. 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. The panel observe, “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's perception. Parents and the community place their utmost trust in teachers whilst children are in their care. In this case, there was evidence of parents being concerned about leaving their children in the care of the School after seeing Miss Hughes act in the way she did. This was a clear example of how the reputation of the teaching profession might be significantly weakened, if that fundamental trust were broken." I am particularly mindful of the finding of inappropriate handling of children and inappropriate language in this case and the impact that such a finding has on the reputation of the profession.

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 and conduct likely to bring the profession into disrepute 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 Hughes. The panel comment:

"Miss Hughes did not provide the panel with any documentary evidence or character references attesting to her abilities as an educator."

"Miss Hughes did explain to the panel that although she was not currently working in the education sector, she had continued to keep up to date with good teaching practices."

"The panel took into account the evidence of other members of staff from the School, which suggested there were ongoing concerns about Miss Hughes' practice."

A prohibition order would prevent Miss Hughes 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 that the Advice suggests that a prohibition order may be appropriate if certain behaviours of a teacher have been proved, and that behaviours relevant in this case included:

- serious departure from the personal and professional conduct elements of the Teachers' Standards;

- misconduct seriously affecting the education and/or safeguarding and well-being of pupils, and particularly where there is a continuing risk;
- abuse of position or trust (particularly involving pupils);
- failure in their duty of care towards a child, including exposing a child to risk or failing to promote the safety and welfare of the children (as set out in Part 1 of KCSIE).

I have also placed considerable weight on the finding of the panel that “the public interest considerations outweighed the interests of Miss Hughes. The current risk of repetition of similar misconduct was the 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.”

I have given less weight in my consideration of sanction therefore, to the contribution that Miss Hughes 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 backed up by insight and remorse, 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 two-year review period.

I have considered the panel’s comments, “The panel considered that Miss Hughes was not incapable of remediating the current risks in this case. The panel envisaged that with clear evidence of an increased understanding of positive handling, behaviour management of pupils and self-regulation in the classroom in line with professional expectations, Miss Hughes might be able to suitably ameliorate those risks.” The panel recommended that a review period of two years would be proportionate to the circumstances in this case.

I have decided that a two-year review period is proportionate and is required to satisfy the maintenance of public confidence in the profession.

**This means that Miss Angela Hughes 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 17 November 2025, two 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 Hughes remains prohibited from teaching indefinitely.

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

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

A handwritten signature in black ink, appearing to read 'D Oatley', with a large, sweeping flourish at the end.

**Decision maker: David Oatley**

**Date: 10 November 2023**

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