



Teaching
Regulation
Agency

Ms Deborah Frost: Professional conduct panel outcome

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

February 2026

Contents

Introduction	3
Allegations	4
Summary of evidence	4
Documents	4
Witnesses	5
Decision and reasons	5
Findings of fact	5
Panel's recommendation to the Secretary of State	13
Decision and reasons on behalf of the Secretary of State	17

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

Teacher:	Ms Deborah Frost
Teacher ref number:	2457557
Teacher date of birth:	29 August 1965
TRA reference:	22665
Date of determination:	17 February 2026
Former employer:	Moorland School, Lancashire (the “School”)

Introduction

A professional conduct panel (“the panel”) of the Teaching Regulation Agency (“the TRA”) convened on 16 February 2026 to 17 February 2026 by way of a virtual hearing, to consider the case of Ms Deborah Frost.

The panel members were Mr Francis Murphy (teacher panellist – in the chair), Mr Robert Della-Sala (lay panellist) and Mrs Anila Rai (lay panellist).

The legal adviser to the panel was Mr James Corrish of Birketts LLP solicitors.

The presenting officer for the TRA was Ms Caroline Collins of Capsticks LLP solicitors.

Ms Frost was not present and was not represented.

The hearing took place in public, except those parts which were in private, and was recorded.

Allegations

The panel considered the allegations set out in the notice of proceedings dated 1 December 2025.

It was alleged that Ms Frost was guilty of unacceptable professional conduct and/or conduct that may bring the profession into disrepute in that, while employed as teacher at Moorland School ('the School'):

1. She improperly amended the mark slip for Pupil A to increase his mark for OCR Cambridge National in Enterprise and Marketing RO65/A ('the Coursework').
2. On or around 24 September 2022 she falsely told the parent of Pupil A that:
 - a. An error with allocation of marks to the Coursework had occurred; and/or
 - b. The error was attributable to OCR.
3. Her conduct as may be proven at allegations 1 and/or 2 above was dishonest and/or lacked integrity.

Ms Frost admitted allegations 1, 2(a), 2(b) and 3, but had not, at least in the notice of proceedings form of 1 December 2025, admitted that her conduct amounted to unacceptable professional conduct and conduct that may bring the profession into disrepute. The panel proceeded on the basis that this was a fully contested hearing.

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 3 to 5

Section 2: Notice of proceedings and response – pages 6 to 37

Section 3: Teaching Regulation Agency witness statements – pages 38 to 177

Section 4: Teaching Regulation Agency documents – pages 178 to 227

In addition, the panel had access to, and considered, a 'proceeding in absence' bundle provided by the presenting officer and written submissions provided by the presenting officer on the matter of jurisdiction as well as her final submissions.

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

In the consideration of this case, the panel had regard to the document Teacher misconduct: Disciplinary Procedures for the Teaching Profession 2020, (the “Procedures”).

Witnesses

The panel heard oral evidence from the following witnesses called by the presenting officer:

Witness A – [REDACTED]

Person B – [REDACTED]

Decision and reasons

The panel announced its decision and reasons as follows:

On 5 January 2015, Ms Frost commenced employment at Moorland School (the ‘School’) becoming Headteacher in 2021. She was also Exams Officer at the relevant time.

On 22 August 2022 Pupil A received his GCSE results.

On 24 August 2022 Person B raised concerns to Ms Frost about Pupil A’s marks as he had received a mark of zero on one module and had received a mark for a module that was not assessed.

On 24 September 2022 Ms Frost allegedly told Person B that OCR (the examinations body) had made an error and she allegedly provided to Person B a revised statement of marks.

On 22 November 2022 Person B contacted OCR directly to raise further issue.

On 14 February 2023 the School informed Person B that the revised statement of marks provided to him had not been produced by OCR.

On 3 August 2023 Ms Frost was barred from delivering OCR assessments.

On 19 October 2023 the TRA received a referral from OCR.

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

Findings of fact

The findings of fact are as follows:

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

1. You improperly amended the mark slip for Pupil A to increase his mark for OCR Cambridge National in Enterprise and Marketing RO65/A ('the Coursework').

The panel noted that in her notice of referral form dated 7 June 2024 and in her notice of proceedings form dated 1 December 2025, Ms Frost had admitted this allegation. Notwithstanding this, and conscious of Ms Frost's absence from the proceedings, the panel proceeded to consider the evidence in front of it before making a finding.

The panel understood that "*mark slip*" in the allegation was a reference to the documents entitled "Statement of Marks" within the bundle of documents.

The panel carefully considered the 2 versions of those statements of marks documents. The panel noted Witness A's evidence that the first statement of marks was the genuine document from the OCR (dated 24 August 2022) the "First Marks Slip", and that the second statement of marks was the document amended by Ms Frost, as provided by her to Person B (dated 21 September 2022) the "Second Marks Slip". The panel noted the differences in the Second Marks Slip included that the overall mark was 94/240 rather than 87/240, that the R065/A score was 0/60 (rather than 22/60 in the First Marks Slip) and the R066/A score was a dash (rather than 15/60 in the First Marks Slip).

The panel further considered the oral evidence and written statement of Witness A. Witness A stated that OCR processes require schools, for the R065/A (the 'Coursework'), to submit pupils' marks onto "*the Repository*", an online system that assists with moderating the assessment.

Witness A stated that marks did not need to be submitted for R064 as the examiner will provide the grade, but that the School had to submit marks for the R065/A and R066/A assessments. He stated that in relation to Pupil A, the School did submit their mark for R065/A being a mark of 0 out of 60 and this had been submitted by Ms Frost.

Witness A further explained that after the marking and moderation process a 'statement of marks' can be provided by OCR. He stated that unless the moderator amended the marks, this would be consistent with the marks the School provided to OCR and is usually issued to pupils after moderation has been approved. Witness A explained that the School is able to print off an interim statement of marks if they wish to, which is what he understood Ms Frost did for the statement of marks of Pupil A on 24 August 2022.

Witness A stated that one month later, he understood that Ms Frost informed Person B that OCR had sent her another statement of marks for Pupil A in which a "*mark of 22*" was provided for the Coursework. Witness A stated his understanding that Person B was told by Ms Frost that OCR had made an error. He submitted that this was untrue as OCR were never contacted and Ms Frost had fraudulently produced the Second Marks Slip.

The panel also considered the OCR communications arising from the Person B's formal complaint submitted on 22 November 2022. The panel noted that OCR emailed Ms Frost

on 11 January 2023, further to their investigation of Person B's complaint, and arranged to speak with Ms Frost on 2 February 2023. The panel noted Witness A's evidence that "8 minutes" before that meeting, Ms Frost emailed a statement "*admitting she had falsified the second statement of marks*". OCR subsequently wrote to Person B on 14 February 2023 confirming that "*the revised Statement of Marks was not produced by OCR*" and that the original 0/60 was the only legitimate mark recorded at the time.

The panel considered the oral evidence and written statement of Person B, who explained that on 22 August 2022 he collected Pupil A's GCSE results and received the First Marks Note which recorded the R065/A coursework module as "*unclassified with 0/60 marks*". He indicated that he was concerned about this for reasons including that he knew Pupil A had submitted the work and had seen it for himself.

Person B stated that he sent an email to Ms Frost on 24 August 2022 seeking clarification regarding these results. He stated that he did not receive a response, so sent a chaser on 6 September 2022.

Person B explained that on 24 September 2022 he received a response from Ms Frost stating that OCR had sent a revised statement of marks and that the issue was caused by a glitch in the system. Person B explained he queried this in an e-mail of 26 September and that on 29 September he received a response from Ms Frost stating that OCR marked all of their business status qualifications out of 240.

Person B explained that he did not correspond further with Ms Frost after 29 September 2022, as the response did not address his concerns, and he therefore raised the matter to the Executive Headteacher and OCR directly.

The panel considered an email before it from Ms Frost of 24 September 2022, in which she stated that "*OCR had sent a revised Statement of Marks*" and that "*the issue was caused by a glitch in the system,*" and attached what she described as a "*revised Statement of Marks*".

The panel considered a further e-mail from Person B to Ms Frost of 26 September 2022 raising additional concerns about the figures presented in the Second Marks Slip.

The panel then considered Ms Frost's subsequent email of 29 September 2022 which stated that "*OCR marked all of their Business Studies qualifications out of 240*" and indicated she had raised this with OCR.

The panel considered a transcript which it had been provided of a conversation between OCR and Ms Frost, dated 2 February 2023. The panel noted that, as it had no direct evidence from Ms Frost, it placed reasonable weight on this transcript as setting out Ms Frost's position on some of the facts. The panel noted that Witness A's evidence was that Ms Frost agreed that this was an accurate reflection of that meeting. The panel noted that Ms Frost detailed the history of how Pupil A's results came to be recorded including

concerns from one of his previous teachers that one of his items of coursework had been awarded a zero mark, out of concern that it had not been Pupil A's work.

Ms Frost was recorded as recognising that she had made a "*huge error*" of judgement in relation to the handling of that matter in May 2022, including in not raising concerns about that coursework with the head of centre at that point.

Ms Frost went on to express that her actions in falsifying the Second Marks Slip had been taken in sheer panic "*to cover it up, to make the problem go away*".

The Panel considered the evidence before it. It noted the evidence of both live witnesses was consistent with Person B having received, by e-mail, an amended marks slip from Ms Frost which had not been produced by OCR. The panel noted that Ms Frost admitted that she had sent this e-mail and the Second Marks Note within these proceedings and in her discussions with OCR.

In light of the evidence provided, the panel was satisfied on the balance of probabilities that Ms Frost had amended the mark slip for Pupil A in that she amended and produced a false "*revised*" marks slip to increase the Coursework mark from "*0/60*" to "*22/60*" and provided this document to Person B. The panel considered that this action was clearly improper on any objective basis.

The panel found allegation 1 proven.

2. On or around 24 September 2022 you falsely told the parent of Pupil A that:

a. An error with allocation of marks to the Coursework had occurred; and/or

b. The error was attributable to OCR.

The panel noted that in her notice of referral form dated 7 June 2024 and in her notice of proceedings form dated 1 December 2025 Ms Frost had admitted this allegation. Notwithstanding this, and conscious of Ms Frost's absence from the proceedings, the panel proceeded to consider the evidence in front of it before making a finding.

The panel again considered the written and oral evidence of Person B, who explained that on 24 September 2022 he received an email from Ms Frost in which she wrote that "*OCR had sent the revised Statement of Marks*" and that the issue was caused by a "*glitch*" in the system; that he queried the situation by e-mail of 26 September 2022 and received a further e-mail from Ms Frost of 29 September 2022.

The panel again considered the written and oral evidence of Witness A, who confirmed that OCR had not issued any revised statement of marks. He stated that OCR was "*oblivious*" to any alleged error until the parent's complaint of 22 November 2022, and that Ms Frost later admitted, on 2 February 2023, that she had fabricated the "*revised*" document herself.

The panel carefully considered the e-mail correspondence which had passed between Person B and Ms Frost between 24 September 2022 and 29 September 2022. The panel noted that the e-mail of 24 September 2022 recorded Ms Frost as stating “OCR have now sent the revised statement of marks for [Pupil A's] business studies exam which I attach here”, and “The issue is caused due to the concession made regarding unit R066/A which is the one that students did not take this year and a glitch whereby some students had marks not allocated properly by their system despite OCR being advised that this was the unit we were not submitting for. This has been rectified now with the marks added for R065/A and the overall mark adjusted accordingly”

The panel noted that in the e-mail of 29 September 2022 Ms Frost is recorded as saying to Person B that “I have raised your further queries with OCR” and “I have asked if they can provide any further clarification” and “OCR have used the /240 for all candidates” and “I have not been able to find any information on how their algorithms have been applied this year so, again, have cleared that with them”.

The panel carefully considered the evidence which it had before it. The panel noted the contents of the emails of 24 and 29 September 2022 from Ms Frost to Person B, the parent of Pupil A, which it had reviewed clearly conveyed to Person B that an error with allocation of marks to the Coursework had occurred and that that error was attributable to OCR. The panel noted that it had considered Person B's evidence that he had received those emails and Witness A's evidence that those representations, as made by Ms Frost, were false. The panel also noted Witness A's evidence that no mistake had been made by OCR in connection with the marks provided. The panel also noted that this allegation was admitted by Ms Frost.

The panel found it proven to the standard of the balance of probabilities that on or around 24 September 2022 Ms Frost falsely told the parent of Pupil A, (i.e. Person B) that an error with allocation of marks to the Coursework had occurred and that that error was attributable to OCR.

Therefore, the panel found allegation 2 (a) and allegation 2 (b) proven.

3. Your conduct as may be proven at allegations 1 and/or 2 above was dishonest and/or lacked integrity.

The panel noted that in her notice of referral form dated 7 June 2024 and in her notice of proceedings form dated 1 December 2025 Ms Frost had admitted this allegation. Notwithstanding this and conscious of Ms Frost's absence from the proceedings the panel proceeded to consider the evidence in front of it before making a finding.

The panel considered whether Ms Frost had acted dishonestly. In doing so, the panel applied the test set out in *Ivey v Genting Casinos (UK) Ltd t/a Crockford*.

The panel first considered its findings on Ms Frost's actual knowledge or belief as to the facts. The panel again noted the e-mail from Ms Frost to Person B of 24 September 2022 in which she told Person B that "*OCR have now sent the revised statement of marks*" and that "*the issue was caused... by a glitch,*" and attached the Second Marks Note.

Per the panel's findings these statements were made by Ms Frost despite Ms Frost clearly knowing they were false. The panel noted that it had also found that the Second Marks Note, which Ms Frost had provided to Person B with that e-mail, had been actively amended by her, rather than provided by OCR, and, again, that Ms Frost clearly knew that the document was false. The panel reminded itself of Witness A's evidence that "*8 minutes*" before an arranged meeting on 2 February 2023 to discuss these issues, Ms Frost emailed OCR "*admitting she had falsified the second statement of marks.*"

The panel noted that Ms Frost's evidence, as provided to the OCR, appeared to include that [REDACTED]. The panel did though note that Ms Frost's actions were clearly knowing and deliberate and that she was highly experienced in relation to examination administration and that it was part of her then current role as headteacher.

The panel was satisfied from the matters which it had found proven in allegations 1 and 2 that Ms Frost was entirely aware that both the document she was providing and the information which she was communicating to Person B were false. The panel was clear that Ms Frost, in the actions she took, was seeking to assign blame for something, for which she was responsible, onto the examinations body which had not done anything wrong.

The panel again considered the note of the telephone interview between Ms Frost and OCR dated 2 February 2023 which recorded that Ms Frost asserted that her actions arose from "*sheer panic*" and realisation that she had made a "*huge error*" and she did not know why she had not raised the matter at the outset with OCR and that she indicated she recognised that she should have done. The panel also again noted though, as above, that Ms Frost's admission as to her wrongdoing did not occur until very shortly before she was due to provide an oral explanation to OCR. The panel noted that this was many months after the actual events and Ms Frost would have had any number of opportunities before then to acknowledge what she had done and to seek to remedy it as she appeared to acknowledge in that interview of 2 February 2023.

The panel considered whether Ms Frost's conduct would be regarded as dishonest by the standards of ordinary decent people. The panel was satisfied that ordinary decent people would view as dishonest a headteacher creating a false marks slip. The panel considered that such people would also consider a teacher falsely telling a parent that there had been an error with examination results which had been the fault of the examination body, to be dishonest.

The panel therefore concluded that Ms Frost's conduct, as found proved in relation to allegation 1 and allegations 2 (a) and 2 (b), was dishonest.

The panel then considered whether Ms Frost's conduct demonstrated a lack of integrity. In doing so, the panel had regard to the principles set out in *Wingate & Anor v The Solicitors Regulation Authority* and was mindful that professionals are not expected to be "paragons of virtue".

The panel considered that deliberately falsifying a coursework results slip, falsely attributing it to the exam body, and presenting a false explanation to a parent are actions that fall significantly below the standards expected of a teacher, even more so a teacher responsible for public examinations. The panel noted in this regard that Ms Frost was responsible for examinations at the School and that there could be no question that Ms Frost had not been fully aware of the importance of the integrity of that exams process and the importance of teachers seeking to uphold the integrity of those processes.

The panel therefore found that Ms Frost's conduct, as found proved in relation to allegations 1 and 2 (a) and 2 (b), was both dishonest and demonstrated a lack of integrity. Allegation 3 was therefore found proved.

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 2022, which is referred to as "the Advice".

The panel was satisfied that the conduct of Ms Frost, in relation to the facts found proved, involved breaches of the Teachers' Standards. The panel considered that, by reference to Part 2, Ms Frost 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 [..]
- 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 Ms Frost's conduct displayed behaviours associated with any of the offences listed on pages 12 and 13 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 the offence type of fraud or serious dishonesty was relevant.

The panel considered again the allegations which it had found proven. The panel noted that it found Ms Frost had effectively deliberately fabricated a false document purported to contain exam results and provided it to the parent of a pupil. The panel noted that it found that Ms Frost had sought to create a false narrative with that parent in which she had suggested, again falsely, that a mistake had been made by the examinations board. The panel noted that Ms Frost was responsible for exams at the School and that she was the Headteacher. The panel had found Ms Frost's actions to be dishonest and to lack integrity. The panel considered that failures of this nature constituted very serious misconduct and that, were teachers to behave like this in general terms, it would completely undermine the integrity of, and trust in, the examinations process.

Whilst the panel noted Ms Frost's submission that [REDACTED] noted that she was an experienced examinations officer. The panel considered it clear on the evidence which it had that Ms Frost would have been fully aware that her actions, which were clearly deliberate and considered, were manifestly wrong.

For these reasons, the panel was satisfied that the conduct of Ms Frost amounted to misconduct of a serious nature which fell significantly short of the standards expected of the profession.

Accordingly, the panel was satisfied that Ms Frost was guilty of unacceptable professional conduct.

In relation to whether Ms Frost's actions amounted to conduct that may bring the profession into disrepute, the panel took into account the way the teaching profession is viewed by others. It 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.

In considering the issue of disrepute, the panel also considered whether Ms Frost's conduct displayed behaviours associated with any of the offences in the list that begins on page 12 of the Advice.

As set out above in the panel's findings as to whether Ms Frost was guilty of unacceptable professional conduct, the Panel found that the offence type of fraud or serious dishonesty was relevant.

The panel carefully considered how the public would view Ms Frost's action. The panel noted that it had found that Ms Frost had deliberately lied to a parent about their child's exam results including in effectively falsifying a document about those results and misleading the parent as to the facts of the situation. The panel considered it to be self-evident, as well as it having been evidenced by Person B, just how important a child's exam results, and any matter concerning them, would be to a parent and to a pupil. The panel considered that the public would rightly be outraged that a teacher, in fact a headteacher and one in charge of examinations, would dishonestly take these actions.

The panel considered that Ms Frost's conduct could potentially damage the public's perception of a teacher.

For these reasons, the panel found that Ms Frost's 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 maintenance of public confidence in the profession and the declaring and upholding proper standards of conduct.

In the light of the panel's findings against Ms Frost, which involved falsifying a mark slip and misrepresenting the cause of the altered marks to Pupil A's father, including by falsely blaming OCR, and acting dishonestly and without integrity in doing so, there was a strong public interest consideration in declaring and upholding proper standards of conduct in the teaching profession.

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

The panel was also satisfied that maintaining proper standards of conduct within the profession required a clear response, as the conduct found proved against Ms Frost fell outside that which could reasonably be tolerated.

In addition to the public interest considerations set out above, the panel went on to consider whether there was a public interest in retaining Ms Frost in the profession.

The panel had no evidence from any person as to Ms Frost's ability as an educator and the panel considered that the adverse public interest considerations above outweighed any interest in retaining Ms Frost in the profession, since her behaviour fundamentally breached the standard of conduct expected of a teacher.

The panel considered carefully the seriousness of the behaviour, noting that the Advice states that the expectation of both the public and pupils, is that members of the teaching profession maintain an exemplary level of integrity and ethical standards at all times.

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 Ms Frost.

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;
- abuse of position or trust [..];
- dishonesty or a lack of integrity, including the deliberate concealment of their actions or purposeful destruction of evidence, especially where these behaviours have been repeated or had serious consequences, [...]
- collusion or concealment including: [...]
 - lying to prevent the identification of wrongdoing;

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.

In the light of the panel's findings, the panel considered whether any of the mitigating factors set out in the Advice were present.

Ms Frost's actions were clearly deliberate.

There was no evidence to suggest that Ms Frost was acting under extreme duress.

The panel noted that there was no evidence before it that Ms Frost had demonstrated exceptionally high standards in her personal and professional conduct, nor that she had made a significant or outstanding contribution to the education sector. Though noting the [REDACTED] suggestion Ms Frost was “*highly embarrassed and profusely apologetic for her out of character actions*” in his correspondence with the OCR, the panel had no material evidence to form a view on whether the actions were, in fact, out of character and no character evidence to consider.

The panel considered whether there were any further mitigating factors. The panel noted that Ms Frost had admitted the allegations and that she had expressed embarrassment and apologised for her actions within her interview with OCR. The panel also noted that whilst it had found Ms Frost’s actions to be deliberate they did not appear to be actions from which she had anything to gain personally beyond the concealment of her previous actions.

The panel reminded itself of its concern that Ms Frost’s admission as to her wrongdoing (then to OCR) came only “*8 minutes*” before her scheduled interview with OCR and that she had, as she acknowledged, had many months to bring to light and seek to remedy her actions before that.

The panel considered then that it had very limited evidence of insight and remorse and limited evidence of acceptance and realisation on Ms Frost’s part of the impact which her actions had, and could have had, on the School, the pupil and the wider profession.

The panel noted that Ms Frost had chosen not to materially engage with the TRA process or these proceedings and had chosen not to actively explain her admitted actions or put forward, either in writing or in person, any evidence of her steps towards gaining insight.

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 or appropriate response to recommend no prohibition order.

In reaching this conclusion, the panel noted the matters which it had itemised from the Advice to be matters which would make it likely a panel would consider a teacher’s behaviour to be incompatible with being a teacher. The panel also attached significant weight to its findings that Ms Frost had acted dishonestly and demonstrated a serious lack of integrity, that the conduct was deliberate and that she had falsified a statement of marks and knowingly misled Person B, attributed fault to OCR when she was aware this was not true and only admitted wrongdoing when placed in a position where she would be forced to engage with the facts by OCR.

The panel concluded that prohibition was both proportionate and appropriate.

For reasons including the above the panel decided that the public interest considerations outweighed the interests of Ms Frost and therefore 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 certain types of case where, if relevant, the public interest will have greater relevance and weigh in favour of not offering a review period.

None of the listed characteristics were engaged by the panel's findings.

The Advice also indicates that there are certain other types of cases where it is likely that the public interest will have greater relevance and weigh in favour of a longer period before a review is considered appropriate. The panel found one of these: serious dishonesty, engaged by its findings.

The panel again considered Ms Frost's assertion that she was [REDACTED] her taking actions so very clearly against the fundamental integrity of the profession. The panel also had no evidence providing an explanation as to why, having taken the steps she now admits she did, she did not, on reflection, admit to that behaviour and seek to address it until such time as she was basically obliged to.

The panel again noted that it had found very limited evidence of insight or remorse on Ms Frost's part and that she had not engaged in the regulatory process. The panel again reminded itself that it had found that Ms Frost, a Headteacher and exams officer, had deliberately engaged in creating a false document and falsely sought to mispresent to Person B that her own wrongdoing was, in fact, the mistake of the external exam body. The panel had found this behaviour to be extremely serious, dishonest and lack integrity.

The panel noted that it was simply not in the position to form a view as to the likelihood that this conduct would be repeated not least given that Ms Frost had not engaged in this process or presented any written submissions or explanations for her admitted dishonest behaviour.

After carefully considering all of the above and the seriousness of the behaviour 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 provision for a 3 year review period.

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 Ms Deborah Frost should be the subject of a prohibition order, with a review period of three years.

In particular, the panel has found that Ms Frost 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 [..]
- 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 Ms Frost fell significantly short of the standards expected of the profession.

The findings of misconduct are serious as they include a finding of dishonesty on the part of a headteacher in creating a false narrative with a parent to suggest that a mistake had been made by the examinations board.

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 Ms Frost, 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 pupils. The panel has observed, “...that failures of this nature constituted very serious misconduct and that, were teachers to behave like this in general terms, it would completely undermine the integrity of, and trust in, the examinations process”. 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 panel noted that Ms Frost had admitted the allegations and that she had expressed embarrassment and apologised for her actions within her interview with OCR. The panel also noted that whilst it had found Ms Frost’s actions to be deliberate they did not appear to be actions from which she had anything to gain personally beyond the concealment of her previous actions”.

The panel has also commented “The panel considered then that it had very limited evidence of insight and remorse and limited evidence of acceptance and realisation on Ms Frost’s part of the impact which her actions had, and could have had, on the School, the pupil and the wider profession”. In my judgement, the lack of insight 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, “...that Ms Frost’s conduct could potentially damage the public’s perception of a teacher”. I am particularly mindful of the finding of dishonesty 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 Ms Frost herself. The panel comment “The panel noted that there was no evidence before it that Ms Frost had demonstrated exceptionally high standards in her personal and professional conduct, nor that she had made a significant or outstanding contribution to the education sector. Though noting the [REDACTED] suggestion Ms Frost was “highly embarrassed and profusely apologetic for her out of character actions” in his correspondence with the

OCR, the panel had no material evidence to form a view on whether the actions were, in fact, out of character and no character evidence to consider”.

A prohibition order would prevent Ms Frost 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 the lack of insight or remorse, *“The panel again noted that it had found very limited evidence of insight or remorse on Ms Frost’s part”.*

I have also placed considerable weight on the finding of the panel that *“...Ms Frost had acted dishonestly and demonstrated a serious lack of integrity, that the conduct was deliberate and that she had falsified a statement of marks and knowingly misled Person B, attributed fault to OCR when she was aware this was not true and only admitted wrongdoing when placed in a position where she would be forced to engage with the facts by OCR”.*

I have given less weight in my consideration of sanction therefore, to the contribution that Ms Frost 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 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 three year review period.

I have considered the panel's comments *“The panel again reminded itself that it had found that Ms Frost, a Headteacher and exams officer, had deliberately engaged in creating a false document and falsely sought to mispresent to Person B that her own wrongdoing was, in fact, the mistake of the external exam body. The panel had found this behaviour to be extremely serious, dishonest and lack integrity. The panel has also said that “it was simply not in the position to form a view as to the likelihood that this conduct would be repeated”.*

I have considered whether a three 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.

In light of the panel's findings of dishonesty and the limited evidence of insight and remorse, I consider that a three year review period is required to satisfy the maintenance of public confidence in the profession.

This means that Ms Deborah Frost 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 26 February 2029, three 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, Ms Frost remains prohibited from teaching indefinitely.

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

Ms Frost has a right of appeal to the High Court within 28 days from the date she is given notice of this order.



Decision maker: Stuart Blomfield

Date: 19 February 2026

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