



Mr Michael Duodu: Professional conduct panel outcome

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

October 2026

Contents

Introduction	3
Allegations	4
Summary of evidence	6
Documents	6
Witnesses	7
Decision and reasons	7
Findings of fact	8
Panel's recommendation to the Secretary of State	15
Decision and reasons on behalf of the Secretary of State	18

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

Teacher: Mr Michael Duodu

Teacher ref number: 4033935

Teacher date of birth: 22 September 1965

TRA reference: 25477

Date of determination: 12 October 2026

Former employer: Bright Minds Creative Academy, Croydon

Introduction

A professional conduct panel (“the panel”) of the Teaching Regulation Agency (“the TRA”) convened on 28 to 30 September 2026 and 12 October 2026 by way of a virtual hearing, to consider the case of Mr Michael Duodu.

The panel members were Mr Tony Coyne (Lay Panellist – in the chair), Ms Claire Shortt (Teacher Panellist) and Mr Benjamin Drouet (Teacher Panellist).

The legal adviser to the panel was Mrs Lucy Mosley of Blake Morgan Solicitors.

The presenting officer for the TRA was Mr Silas Lee, Counsel, instructed by Brabners Solicitors.

Mr Duodu was present and was not represented.

The hearing took place in public and was recorded.

Allegations

The panel considered the allegations set out in the notice of hearing dated 18 June 2026.

It was alleged that Mr Duodu was guilty of unacceptable professional conduct and/or conduct that may bring the profession into disrepute in that:

While a teacher at the Bright Minds Creative Academy (“the Academy”):

1. On or around 25 November 2023 you provided an employment reference for Person A, which stated that:
 - a. Person A had not been subject to disciplinary procedures;
 - b. Person A had not been subject to any safeguarding investigations;
 - c. You were not aware of any material reason why Person A was unsuitable to work with children and/ or vulnerable adults;
 - d. You were a member of the Senior Leadership Team at the Academy.
2. At the time of your conduct as described at paragraph 1 above you knew:
 - a. You were providing a reference which would be understood as being provided on behalf of the Academy
 - b. You were not permitted to provide a reference on behalf of the Academy, as you were not a member of the Senior Leadership Team;
 - c. You had not verified the accuracy of your statements at paragraphs 1a) and/ or 1b) and/ or 1c) with the Academy.
3. Your conduct as described at paragraphs 1 and/ or 2 displayed a lack of integrity.
4. Your conduct as described at paragraph 1d) was dishonest, as you knew that you were not a member of the Senior Leadership Team at the Academy.

Mr Duodu denied the allegations in full.

Mr Duodu further denied that his actions amounted to unacceptable professional conduct and/or conduct that may bring the profession into disrepute.

Summary of evidence

Documents

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

Section 1: Notice of hearing and response – pages 3 to 10

Section 2: Teaching Regulation Agency witness evidence – pages 11 to 149

Section 3: Teaching Regulation Agency documents – pages 150 to 173

Section 4: Teacher documents – pages 174 to 184

In addition, the panel agreed to accept the following:

- The second witness statement of Witness A dated 18 August 2026;
- Exhibits CH1a- CH2a; and
- An email chain between Mr Duodu and [REDACTED]

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

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 witness called by the presenting officer:

Witness A – [REDACTED].

Mr Duodu gave oral evidence. He did not call any witnesses.

Decision and reasons

The panel announced its decision and reasons as follows:

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

Horizon is a company that supports over 800 children and young people across England. They have 12 Special Educational Needs ("SEN") schools across the country and 48

children's homes for children aged between 8 and 16. They also have supported accommodation for young adults between 18 and 24 who need extra support.

Bright Minds Creative Academy ("the Academy") is one of Horizon's SEN schools. It is an independent special day school providing education to vulnerable children and young people with SEN.

Mr Duodu worked as a Qualified Teacher at the Academy from 8 September 2022 until his dismissal on 28 February 2025.

On 29 September 2023, an incident took place involving Person A, [REDACTED], which led to safeguarding concerns. T[REDACTED].

As part of Horizon's investigation into Person A, in January 2025 a Disclosure and Barring Service referral review exercise was carried out. A check on Person A's emails revealed an employment reference provided by Mr Duodu for Person A to [REDACTED] on 25 November 2023. Horizon was concerned that Mr Duodu did not have the requisite authority to provide such a reference and had provided false information. As a result, an investigation was commenced into his conduct.

On 6 February 2025, Mr Duodu was suspended from the Academy.

On 11 February 2025, an investigation meeting took place.

On 28 February 2025, a disciplinary hearing was held. Mr Duodu was dismissed from his post. He appealed his dismissal.

On 20 March 2025, an appeal hearing took place. Mr Duodu's appeal was not upheld.

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:

While a teacher at the Bright Minds Creative Academy ("the Academy"):

- 1. On or around 25 November 2023 you provided an employment reference for Person A, which stated that:**
 - a. Person A had not been subject to disciplinary procedures;**
 - b. Person A had not been subject to any safeguarding investigations;**

- c. You were not aware of any material reason why Person A was unsuitable to work with children and/ or vulnerable adults;**
- d. You were a member of the Senior Leadership Team at the Academy.**

These allegations were all denied by Mr Duodu on the basis that, although he admitted providing a reference for Person A on 25 November 2023, the reference provided was a character reference and not an employment reference.

As allegations 1.a. to 1.d. all relate to the same document and are closely linked factually, the panel considered them together.

The panel had sight of two versions of the reference in question. One was provided by Witness A and one was provided by Mr Duodu. The version provided by Witness A had been attached to the email sent by Mr Duodu to [REDACTED] on 25 November 2023. This had been obtained when Horizon had accessed his Academy email address. Mr Duodu told the panel that the version he provided had come from his personal emails.

The panel noted that the only substantive difference between the two versions was that the version provided by Witness A gave the organisation that the referee worked at with the candidate as 'Bright Minds Creative Academy' whilst the version provided by the Teacher left that box blank.

In the section of the reference dealing with safeguarding, Mr Duodu had put a 'x' in the 'no' box in response to the question of whether the candidate had been subject to any disciplinary procedures and he had indicated the same response when asked whether the candidate had been subject to any safeguarding investigations and whether he was aware of any material reason why the candidate was unsuitable to work with children and/ or vulnerable adults. Mr Duodu did not dispute answering no to the three questions posed, but told the panel that he had done so based on his personal knowledge and belief at the time of completing the form. He stated that had there been any concerns of this nature, Person A would not have been working at the Academy in any event, although it was pointed out to him by the TRA that Person A was no longer working at the Academy when Mr Duodu completed the reference.

Mr Duodu signed off the reference by stating that his position was '*SLT/ Line Manager/ Science Teacher*'. He provided the reference to [REDACTED] from his work email address which displayed Horizon's email signature and logo at the bottom. The reference was also sent to Person A's private email address.

The panel noted that in his response to the TRA's investigation dated 17 September 2025, Mr Duodu had written:

“On the form, I identified myself as SLT, a position never conferred on me by both BMCA or Horizoncare.”

The panel also noted that in his without prejudice offer for settlement dated 17 September 2025, Mr Duodu had written:

“... I identified myself as SLT, a title I do not hold in the school...”

However, in his oral evidence Mr Duodu told the panel that he could not recall whether he had written ‘SLT/ Line Manager’ or whether those options pre-existed on the form for the referee to delete as appropriate. Mr Duodu only recalled writing ‘Science Teacher’ in the position box.

Mr Duodu told the panel that at the time he completed the reference he was not aware that Person A had been subject to any disciplinary procedures or safeguarding investigations. This was accepted by the TRA. Mr Duodu explained that he understood that the reference he was providing for Person A was a personal character reference, and was not intended to be an employment reference on behalf of Horizon. Mr Duodu accepted in his oral evidence that he understood that employment references had to be completed by the headteacher.

The panel first considered whether the reference provided by Mr Duodu for Person A was an employment reference (as alleged by the TRA) or a character reference (as put forward by Mr Duodu). The panel was satisfied that the reference provided was an employment reference for the following reasons:

- The reference form was provided to Mr Duodu to complete in order for Person A to obtain future employment in the teaching profession.
- The reference form required Mr Duodu to provide the following information:
 - dates of employment;
 - an opinion as to whether he would re-employ Person A;
 - work-related general conduct information, including punctuality, professional conduct, reliability and attendance record;
 - an opinion as to whether Person A was suitable for supply work;
 - details of any safeguarding concern(s);
 - details of any disciplinary investigation(s);
- Mr Duodu had indicated on the form that he was employed in a senior position to Person A ([REDACTED]);

- The reference form indicated that Mr Duodu held the position of “*SLT/ Line Manager/ Science Teacher*”;
- Mr Duodu had both received and submitted the reference form using his Academy email address rather than his personal email address;
- Mr Duodu’s Academy emails included a signature bar confirming that he was a Teacher at the Academy and containing Horizon’s logo and website.

The panel considered that the questions that Mr Duodu answered on the reference were specific to Person A’s employment and were clearly posed to enable [REDACTED] to assess his suitability for a future teaching position. There were no particular questions about his character. In addition, in his oral evidence to the panel, Mr Duodu stated that his understanding of an employment reference as opposed to a character reference was that an employment reference would contain information such as how long the person had worked there, their work record and matters arising during employment. The panel noted that similar questions were contained within the reference he provided to [REDACTED].

The reference specifically asked whether the referee would re-employ Person A, and Mr Duodu had answered ‘yes’. He confirmed this in his oral evidence. The panel was of the view that questions about re-employment would only be asked on an employment reference and not on a character reference.

In all the circumstances, the panel was satisfied that the reference provided by Mr Duodu was an employment reference and not a character reference. It was of the view that this should have been obvious to Mr Duodu as an experienced teacher.

The panel noted that there was a discrepancy in the two versions of the reference it had been provided with. It concluded that, regardless of whether ‘Bright Minds Creative Academy’ had been included as the referee’s organisation when the form was completed or the box had been left blank, it was still of the view that the reference was clearly intended to be an employment reference.

Having established that the reference provided was an employment reference, the panel next considered whether Mr Duodu had stated on the reference that Person A had not been subject to disciplinary procedures, had not been subject to safeguarding investigations and/ or that he was not aware of any material reason why Person A was unsuitable to work with children and/ or vulnerable adults. The panel had sight of the reference and could clearly see that Mr Duodu had put an ‘x’ in the ‘no’ box in response to these questions under the section of the form entitled ‘safeguarding’.

On the balance of probabilities, the panel found allegations 1.a. to 1.c. proven.

The panel further considered whether Mr Duodu had stated on the employment reference that he was a member of the Senior Leadership Team ("SLT"). It noted the inconsistencies in the account previously provided in response to the TRA and to the panel at this hearing. It was of the view that, regardless of whether Mr Duodu had written '*SLT/ Line Manager*' or whether those options pre-existed on the form for the referee to delete as appropriate and Mr Duodu had not done so, he had clearly given the impression to [REDACTED] that he was of sufficient seniority to provide an employment reference on behalf of the Academy.

On the balance of probabilities, the panel found allegation 1.d proven.

2. At the time of your conduct as described at paragraph 1 above you knew:

- a. You were providing a reference which would be understood as being provided on behalf of the Academy**
- b. You were not permitted to provide a reference on behalf of the Academy, as you were not a member of the Senior Leadership Team;**
- c. You had not verified the accuracy of your statements at paragraphs 1a) and/ or 1b) and/ or 1c) with the Academy.**

These allegations were all denied by Mr Duodu.

As allegations 2.a to 2.c. all relate to the same document and are closely linked factually, the panel considered them together.

Witness A told the panel that Horizon's policy was that employment references were completed by the Employee Relations Team as they had access to staff folders and so could check whether there were ongoing concerns or investigations into an employee. She explained that Mr Duodu did not have access to staff folders and so did not have access to this information.

Witness A confirmed that Mr Duodu did not contact the Employee Relations Team or anyone in the Academy's SLT to check whether there were ongoing safeguarding concerns or disciplinary procedures against Person A before providing him with a reference.

Witness A explained that had the Employee Relations Team completed the reference, the responses to the questions in the safeguarding section would have been entirely different. It would have been disclosed to [REDACTED] that Person A was "[REDACTED]", that he had been subject to disciplinary procedures and safeguarding investigations [REDACTED].

Mr Duodu told the panel that he had both received and submitted the reference form using his professional email address rather than his personal email address. The panel noted that the email sent to [REDACTED] by Mr Duodu attaching the reference included a signature bar confirming that he was a teacher at the Academy and containing Horizon's logo and website. It concluded that by providing a reference using his professional email address, Mr Duodu knew this would be understood by [REDACTED] as being provided on behalf of the Academy.

The panel accepted that Mr Duodu was not part of the SLT and so was not included in any discussions relating to the dismissal or sanction of employees. However, it considered that even had Mr Duodu been unaware of the safeguarding concerns and disciplinary procedures in relation to Person A, as an experienced teacher trained in safeguarding, he should have checked this information with someone in the SLT before submitting the reference. Further, despite admitting that any issues concerning Person A's employment were outside his knowledge, Mr Duodu made no attempt to caveat his responses with words to the effect of 'to the best of my knowledge and belief' or 'unknown' on the reference form, nor did he leave sections blank or provide any explanatory information in the covering email.

Mr Duodu confirmed that he had undertaken annual safeguarding training and had conducted safeguarding training for junior colleagues.

The panel took into account the following relevant sections of Keeping Children Safe in Education ("KCSiE") 2023:

Part 3: Safer Recruitment, paragraph 223:

"Schools and colleges should... ensure any references are from the candidate's current employer and have been completed by a senior person with appropriate authority (if the referee is school or college based, the reference should be confirmed by the headteacher/principal as accurate in respect of any disciplinary investigations)."

Part 3: Safer Recruitment, paragraph 224:

"When asked to provide references, schools and colleges should ensure the information confirms whether they are satisfied with the applicant's suitability to work with children and provide the facts (not opinions) of any substantiated safeguarding concerns/allegations that meet the harm threshold."

Part 4: Safeguarding concerns or allegations made about staff, including supply teachers, volunteers and contractors, paragraph 419:

“Substantiated safeguarding allegations that meet the harm threshold should be included in references, provided that the information is factual and does not include opinions.”

Mr Duodu’s actions meant that Horizon had breached KCSiE. In the panel’s view, Mr Duodu as an experienced teacher trained in safeguarding should have been aware that he was not permitted to provide an employment reference on behalf of the Academy as he was not a member of the SLT.

On the balance of probabilities, the panel found allegations 2.a. to 2.c. proven.

3. Your conduct as described at paragraphs 1 and/ or 2 displayed a lack of integrity.

This allegation was denied by Mr Duodu.

The panel took account of the decision of the Court of Appeal in *Wingate v SRA; SRA v Mallins* [2018] EWCA Civ 366. It recognised that integrity denotes adherence to the ethical standards of the profession and the panel therefore considered whether, by his actions, Mr Duodu failed to adhere to those standards.

The panel concluded that Mr Duodu’s conduct as described at paragraphs 1 and 2 did amount to a lack of integrity. He provided incorrect information on an employment reference for a professional colleague and misrepresented himself on the form as a member of the SLT when he was not. Further, Mr Duodu used his professional email account to submit the reference which indicated that he was providing the reference on behalf of the Academy, when he was not authorised to do so.

Mr Duodu’s actions had the potential to mislead [REDACTED] into believing that there were no safeguarding concerns or outstanding disciplinary matters relating to Person A and that he was a suitable candidate for supply work, when he was not. This placed pupils at a potential risk of harm and was in breach of statutory frameworks.

In addition, the panel considered that even if Mr Duodu had been unaware of any safeguarding concerns or disciplinary matters relating to Person A, he had the opportunity, and indeed it was incumbent upon him as an experienced teacher, to make further enquiries before submitting an employment reference. He did not do so. As such, he showed a disregard for the duties and responsibilities upon him in his professional role.

On the balance of probabilities, the panel found allegation 3 proven.

4. Your conduct as described at paragraph 1.d. was dishonest, as you knew that you were not a member of the Senior Leadership Team at the Academy.

This allegation was denied by Mr Duodu.

In determining whether his conduct as described at paragraph 1.d. was dishonest, the panel considered Mr Duodu's state of knowledge or belief as to the facts before determining whether his conduct was dishonest by the standards of ordinary decent people.

The panel took account of the following matters regarding his state of mind at the time:

- Mr Duodu knew that he was not a member of the SLT;
- Mr Duodu was aware that a member of the SLT was required to complete the employment reference; and
- The majority of the teachers at the Academy were unqualified. As Mr Duodu was one of only a small number of qualified teachers, he believed himself to hold a senior role at the Academy, without being formally appointed as such.

Mr Duodu had, by his own admission, recorded on the form that he was a member of the SLT. It followed that, in recording on the reference form that he was a member of the SLT when he was not, his actions were deliberately misleading and tantamount to deception.

This was, in the panel's view, dishonest conduct by the standards of ordinary decent people.

On the balance of probabilities, the panel found allegation 4 proven.

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

Having found all of the allegations proven, the panel went on to consider whether the facts of those proven 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 first considered whether the conduct of Mr Duodu, in relation to the facts found proved, involved breaches of the Teachers’ Standards Guidance for School Leaders, School Staff and Governing Bodies (“the Standards”).

The panel was satisfied that the conduct of Mr Duodu in relation to the facts found proven involved breaches of the Standards. The panel considered that, by reference to Part 2, Mr Duodu 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 an understanding of, and always act within, the statutory frameworks which set out their professional duties and responsibilities.

The panel also considered whether Mr Duodu'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 none of these offences was relevant.

The panel was satisfied that the conduct of Mr Duodu amounted to misconduct of a serious nature which fell significantly short of the standards expected of the profession, and thereby was unacceptable professional conduct.

In making this judgment, the panel drew upon its knowledge and experience of the teaching profession.

The panel would have expected Mr Duodu, as an experienced teacher, to have recognised the importance of providing accurate information in an employment reference in accordance with statutory frameworks. Further, as Mr Duodu had been trained in safeguarding and had delivered such training to junior colleagues, the panel considered that he should have been cognisant of ensuring that only persons who were safe to do so should be allowed to work with children. Providing assurance of a colleague's suitability to work with children without being in possession of the necessary information, and failing to obtain it, fell significantly short of the standards expected of a teacher.

In considering whether Mr Duodu'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 Mr Duodu'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 Mr Duodu was guilty of unacceptable professional conduct, the panel found that none of these offences were relevant.

The panel's findings of misconduct were serious and it considered that the conduct displayed would be likely to have a negative impact on Mr Duodu's status as a teacher, and damaging to the public perception of the teaching profession.

The panel therefore found that Mr Duodu's actions constituted conduct that may bring the profession into disrepute.

In summary, the panel found that Mr Duodu's 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. 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 safeguarding and wellbeing of pupils;
- the maintenance of public confidence in the profession; and
- declaring and upholding proper standards of conduct.

Given that the panel was concerned with the non-disclosure of safeguarding matters, the safeguarding and wellbeing of pupils was clearly engaged by its findings.

Similarly, the panel considered that public confidence in the profession could be seriously weakened if conduct such as that found against Mr Duodu 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 Mr Duodu was 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 Mr Duodu in the profession.

The panel was provided with very limited evidence about Mr Duodu's practice as a teacher. Although he was an experienced practitioner, he did not present any references or testimonials. However, the panel bore in mind that no doubt had been cast upon his abilities as a teacher. It therefore considered that there was a degree of public interest in retaining Mr Duodu in the profession, albeit that this was limited in the circumstances.

The panel carefully considered 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 whether or not it would be proportionate to impose a prohibition order, taking into account the effect that this would have on Mr Duodu.

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; and
- dishonesty or a lack of integrity.

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 the following mitigating factors were present in this case:

- Mr Duodu had an otherwise unblemished record in that there were no adverse regulatory findings against him.
- Mr Duodu had fully engaged with the TRA's investigation and attended the final hearing.
- This was an isolated episode in the context of Mr Duodu's teaching career as a whole.

- There was clear evidence of regret, remorse and insight in relation to his conduct. Mr Duodu fully understood that his actions were wrong, accepted responsibility for them and apologised to the panel.
- It had taken a prolonged period of time to reach this stage, such that the impact of these proceedings had been felt by Mr Duodu for some 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, on balance, a recommendation of no prohibition order would be both a proportionate and an appropriate response.

On the basis of the evidence available, the proven conduct was an isolated incident in the context of Mr Duodu's career as a whole. Whilst his actions may have put pupils at a potential risk of future harm, there was no evidence of actual harm.

The panel considered that Mr Duodu's actions amounted to a misguided attempt to assist a professional colleague with a reference. During the final hearing, Mr Duodu had sought to raise failings in the Academy's investigative processes as an excuse for his conduct. The panel regarded this as unpersuasive. Regardless of any shortcomings in the investigation, the panel was of the view that Mr Duodu had clearly demonstrated poor judgment and a disregard for statutory frameworks.

However, on balance, the panel determined that, in the specific circumstances of the allegations found proven, the conduct was not sufficiently serious to warrant a prohibition order, which was accordingly not necessary or proportionate to safeguard the public interest considerations Mr Duodu's actions gave rise to.

Having gone through this experience, and noting his expressions of regret and remorse, the panel considered it was unlikely that Mr Duodu would put himself in the same situation again. The panel considered it was more likely than not that Mr Duodu has learnt important lessons and his mistakes were unlikely to be repeated. It also noted that the teacher had continued to work at the Academy for two years after the reference was submitted (and before it was discovered) without further complaint or incident.

Further, whilst the conduct found proven could be said to be reflective of Mr Duodu's lack of understanding of safeguarding, the panel considered that, having gone through the Academy's disciplinary process and the TRA's proceedings, the need for Mr Duodu to reflect and learn from these events will be all too apparent to him.

In all the circumstances, whilst it was, inevitably, not possible to say that there was no risk of repetition, the panel was satisfied that the risk was sufficiently reduced in this case.

For these reasons and having weighed all relevant considerations, whilst fully recognising the seriousness of the conduct, the panel concluded that a recommendation for a prohibition order would not be appropriate or proportionate in this case.

Having very carefully taken account of the public interest considerations Mr Duodu's proven conduct gave rise to, the panel considered that the publication of the adverse findings it has made would be sufficient to send an appropriate message as to the standards of behaviour that were acceptable, and the publication would maintain public confidence in the profession.

The panel considered this was a proportionate outcome, particularly in circumstances where the panel's published findings may have a residual impact in terms of Mr Duodu's professional reputation and future employment prospects.

Further, the panel considered that the passage of time since these concerns first came to light and the repercussions there had been for Mr Duodu, meant that a prohibition order would be punitive and disproportionate.

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 sanction.

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 Mr Michael Duodu should not be the subject of a prohibition order. The panel has recommended that the findings of unacceptable professional conduct and conduct likely to bring the profession into disrepute should be published and that such an action is proportionate and in the public interest.

In particular, the panel has found that Mr Duodu 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 an understanding of, and always act within, the statutory frameworks which set out their professional duties and responsibilities.

The panel has found that Mr Duodu's actions led to breaches of the statutory guidance Keeping children safe in education (KCSIE).

The panel has found that the conduct of Mr Duodu fell significantly short of the standards expected of the profession.

The findings of misconduct are serious as they include a finding of dishonesty.

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 Mr Duodu, 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:

"The panel would have expected Mr Duodu, as an experienced teacher, to have recognised the importance of providing accurate information in an employment reference in accordance with statutory frameworks. Further, as Mr Duodu had been trained in safeguarding and had delivered such training to junior colleagues, the panel considered that he should have been cognisant of ensuring that only persons who were safe to do so should be allowed to work with children. Providing assurance of a colleague's suitability to work with children without being in possession of the necessary information, and failing to obtain it, fell significantly short of the standards expected of a teacher."

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 has set out as follows:

“There was clear evidence of regret, remorse and insight in relation to his conduct. Mr Duodu fully understood that his actions were wrong, accepted responsibility for them and apologised to the panel.”

I have therefore given this element 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 has observed:

“The panel’s findings of misconduct were serious and it considered that the conduct displayed would be likely to have a negative impact on Mr Duodu’s status as a teacher, and damaging to the public perception of the teaching profession.”

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 Mr Duodu himself. The panel has commented:

“The panel was provided with very limited evidence about Mr Duodu’s practice as a teacher. Although he was an experienced practitioner, he did not present any references or testimonials. However, the panel bore in mind that no doubt had been cast upon his abilities as a teacher. It therefore considered that there was a degree of public interest in retaining Mr Duodu in the profession, albeit that this was limited in the circumstances.”

I have also noted the panel’s comments that Mr Duodu had an otherwise unblemished record with no adverse regulatory findings, that he had fully engaged with the TRA’s investigation and that this was an isolated incident in his teaching career.

A prohibition order would prevent Mr Duodu from teaching. A prohibition order would also clearly deprive the public of his contribution to the profession for the period that it is in force.

I have carefully considered the panel's comments on the mitigating factors in this case and its recommendation that a prohibition order would not be necessary or proportionate.

I have also carefully considered what the Advice says about the criteria that could lead to a panel determining that it would not be appropriate to recommend a prohibition order. None of the three criteria are present in this case.

There is no evidence that Mr Duodu's actions were not deliberate or that he was acting under extreme duress. In fact, the panel has stated that "in recording on the reference form that he was a member of the SLT when he was not, his actions were deliberately misleading and tantamount to deception" and that his "actions amounted to a misguided attempt to assist a professional colleague with a reference."

There is also no evidence that Mr Duodu demonstrated exceptionally high standards in both personal and professional conduct and has contributed significantly to the education sector. The panel has stated that it "was provided very limited evidence about Mr Duodu's practice as a teacher" and has found that Mr Duodu's proven behaviour lacked integrity and was dishonest.

Although the panel has found that there was evidence of insight and remorse, it has also noted that "During the final hearing, Mr Duodu had sought to raise failings in the Academy's investigative processes as an excuse for his conduct. The panel regarded this as unpersuasive." In my judgment, this raises concerns about the extent of Mr Duodu's insight and remorse.

I have also taken a different view to the panel on the seriousness of Mr Duodu's conduct. The panel has said that "the proven conduct was an isolated incident in the context of Mr Duodu's career as a whole" and that while "his actions may have put pupils at a potential risk of future harm, there was no evidence of actual harm." By providing a reference that he did not have the authority to provide, and which contained false information, Mr Duodu heightened the risk that an individual who had been dismissed for gross misconduct could take up a position in another school without a full risk assessment. In my judgment, this is a very serious matter which could have undermined the safety and well-being of pupils in that school.

Having weighed all these factors, I have concluded that 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, 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. The Advice sets out that a review period may not be less than two years. It also states that where a case involves serious dishonesty “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”.

I have taken into account that Mr Duodu did not benefit personally from his dishonesty and that this was a one-off incident. In view of these and the other mitigating factors I have concluded that a two-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 my judgement, a two-year period will also provide sufficient time for Mr Duodu to develop his understanding of safeguarding requirements and how to apply them should he wish to apply for the prohibition order to be set aside.

I have decided therefore that 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.

This means that Mr Michael Duodu is prohibited from teaching indefinitely and cannot teach in any school, sixth form college, relevant youth accommodation or children’s home in England. He may apply for the prohibition order to be set aside, but not until 22 October 2028, 2 years from the date of this order at the earliest. This is not an automatic right to have the prohibition order removed. If he does apply, a panel will meet to consider whether the prohibition order should be set aside. Without a successful application, Mr Duodu remains prohibited from teaching indefinitely.

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

Mr Duodu has a right of appeal to the King’s Bench Division of the High Court within 28 days from the date he is given notice of this order.

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

Decision maker: David Oatley

Date: 14 October 2026

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