

Conduct and Competence Committee

Substantive Hearing

19 May 2017

Nursing and Midwifery Council, 61 Aldwych, London WC2B 4AE

Name of Registrant Nurse:	Theresa Okondunjokanma
NMC PIN:	15F1970E
Part(s) of the register:	Registered Nurse – sub part 1 RNA- Adult- February 2016
Area of Registered Address:	England
Type of Case:	Conviction
Panel Members:	Kenneth Caley (Chair Lay member) Julia Whiting (Registrant member) Thomas Woods (Lay member)
Legal Assessor:	Megan Ashworth
Panel Secretary:	Marina Jones
Registrant:	Not present and not represented
Nursing and Midwifery Council:	Represented by Grace Hansen, counsel, instructed by NMC Regulatory Legal Team.
Facts proved:	1; 2; 3
Facts not proved:	N/A
Grounds:	Conviction
Fitness to practise:	Impaired
Sanction:	Striking off order
Interim order:	Interim suspension order (18 months)

Details of charge (as amended):

That you, a Registered Nurse, on 02 September 2016 at Woolwich Crown Court were convicted of:

1. Failure to disclose information to make a gain for yourself or another or to cause loss to another or expose another to a loss on 11 July 2009, contrary to the Fraud Act 2006 s.1(2)(b)+s.3;
2. Sub-letting a dwelling let under an assured tenancy in breach of a term of tenancy from 15 October 2013 to 29 January 2016 contrary to the Prevention of Social Housing Fraud Act 2013 s.2(1);
3. Obtaining services by deception contrary to the Theft Act 1978 s.1;

AND, in light of the above, your fitness to practise is impaired by reason of your conviction.

Decision on Service of Notice of Hearing:

The panel was informed at the start of this hearing that written notice of this hearing had been sent to Ms Okondunjokanma's registered address by recorded delivery and by first class post on 12 April 2017. Royal Mail "Track and Trace" documentation confirmed that the notice of hearing was sent to Ms Okondunjokanma's registered address by recorded delivery on that date.

The panel took into account that the notice letter provided details of the allegation, the time, dates and venue of the hearing and, amongst other things, information about Ms Okondunjokanma's right to attend, be represented and call evidence, as well as the panel's power to proceed in her absence. The "Track and Trace" documentation also indicated that the notice was signed in the name of Ms Okondunjokanma's on the following day.

Ms Hansen submitted the NMC had complied with the requirements of Rules 11 and 34 of the Nursing and Midwifery Council (Fitness to Practise) Rules 2004, as amended ("the Rules").

The panel accepted the advice of the legal assessor.

In the light of all of the information available, the panel was satisfied that Ms Okondunjokanma has been served with notice of this hearing in accordance with the requirements of Rules 11 and 34. It noted that the rules do not require delivery and that it is the responsibility of any registrant to maintain an effective and up-to-date registered address.

Decision on proceeding in the absence of the Registrant:

The panel had regard to Rule 21 (2) (b) which states:

“Where the registrant fails to attend and is not represented at the hearing, the Committee...may, where the Committee is satisfied that the notice of hearing has been duly served, direct that the allegation should be heard and determined notwithstanding the absence of the registrant...”

Ms Hansen set out the background to this matter. She told the panel that there was a substantive hearing of this matter scheduled for 07 April 2017, which Ms Okondunjokanma did not attend and which did not proceed in her absence. On that occasion, that panel concluded that Ms Okondunjokanma’s non-attendance may have been the result of her health rather than her voluntarily absenting herself.

Ms Hansen referred the panel to an email dated 10 May 2017 from Ms Okondunjokanma stating “[I] am fed up with this. Why was the hearing not heard?” Ms Hansen referred the panel to further emails from Ms Okondunjokanma which reiterate this sentiment. Ms Hansen referred the panel to an email from Ms Okondunjokanma, dated 12 April 2017, stating that her health was not the reason for her lack of attendance. That email states that Ms Okondunjokanma’s reason for not attending is that the hearing is held in public.

Ms Hansen submitted that there is no live health issue in this case. She submitted that Ms Okondunjokanma has made it very clear that she does not wish to attend the hearing and would like the hearing to proceed in her absence. She referred the panel to an email dated 13 April 2017 stating “I will not be attending the hearing. Yes the hearing should go ahead in my absence.” A further email from Ms Okondunjokanma dated 04 May 2017 provides her phone number, which has been given in response to a request from her case officer who states that the panel may wish to speak to her on the phone.

Ms Hansen submitted that in providing her telephone number, Ms Okondunjokanma is not requesting to be able to participate in the hearing via telephone. Ms Hansen submitted that Ms Okondunjokanma has made it clear that she wishes the hearing to proceed in her absence and Ms Hansen invited the panel to do so.

The panel accepted the advice of the legal assessor. The panel noted that its discretionary power to proceed in the absence of a registrant under the provisions of Rule 21 is one that should be exercised “*with the utmost care and caution*” as referred to in the case of *R. v Jones (Anthony William), (No.2) [2002] UKHL 5*.

The panel has decided to proceed in the absence of Ms Okondunjokanma. In reaching its decision it noted the history of this case. It was of the view that Ms Okondunjokanma is unlikely to attend on a future occasion if this matter was adjourned. This matter has already been adjourned in order to facilitate Ms Okondunjokanma’s attendance and Ms Okondunjokanma has indicated that the ongoing proceedings have had a negative effect on her. The panel is satisfied that Ms Okondunjokanma is aware of today’s proceedings and has explicitly stated that she wishes the hearing to proceed without her.

The panel is of the view that it is in the public interest to proceed with the hearing today. The panel decided that the provision of a telephone number by Ms Okondunjokanma was a safety net in case anything should arise during the course of the hearing which would necessitate the panel requiring to speak to Ms Okondunjokanma, and was not a request to fully participate in the hearing today.

In these circumstances, the panel has decided that it is fair, appropriate and proportionate to proceed in the absence of Ms Okondunjokanma. The panel will draw no adverse inference from Ms Okondunjokanma’s absence in its findings of fact.

Decision and reasons on application to amend charge

Ms Hansen made an application to amend the charge on the basis that the wrong date and the wrong offence is contained in the original charges. She told the panel that the original charges were drafted on the basis of the PNC document, which is inaccurate, in that it states that Ms Okondunjokanma was convicted on 18 July 2016 for obtaining property by deception. She referred the panel to the certificate of conviction from Southwark Crown Court, which contains a different date and offence, setting out that Ms Okondunjokanma was in fact convicted on 02 September 2016 for obtaining services by deception.

Ms Hansen apologised for the error on the part of the NMC, which should have been picked up before the hearing. However, she submitted that it must be in the interests of justice for the charges to be factually correct. She submitted that there is no prejudice caused to Ms Okondunjokanma in this amendment. It is apparent from her correspondence that she knows precisely case she has to meet and in respect of which offence and on which date she was convicted.

The panel accepted the advice of the legal assessor who advised that Rule 28 of the Rules states:

28 (1) At any stage before making its findings of fact ...

(i) ... the Conduct and Competence Committee, may amend

(a) the charge set out in the notice of hearing ...

unless, having regard to the merits of the case and the fairness of the proceedings, the required amendment cannot be made without injustice.

The panel was of the view that such an amendment, as applied for, was in the interests of justice. The panel was satisfied that there would be no prejudice to Ms Okondunjokanma and was made in the interests of accuracy. The panel accepts the application and amends the charges accordingly.

Decision and Reasons on application under Rule 19

In her correspondence to the NMC, Ms Okondunjokanma requested that the hearing should be held entirely in private. In an email dated 23 March 2017 she states that she “does not want media involve[d] in my case” and states that she would like the hearing to be private for the sake of her family. The panel treated this as an application under Rule 19.

Ms Hansen submitted that the NMC opposes that application. Ms Okondunjokanma’s Crown Court trial and the subsequent sentencing hearing were heard in public and therefore these matters are already in the public domain, thereby negating the reasons behind Ms Okondunjokanma’s application. She further submitted that there is a high public interest in this case and there is no need to deviate from the standard position of holding Conduct and Competence Committee hearings in public. She submitted that any reference to the registrant’s health could and should be discussed in private.

The legal assessor reminded the panel that, Rule 19 (3) states that the panel may hold hearings partly or wholly in private if it is satisfied that this is justified by the interests of any party or by the public interest.

The panel refused Ms Okondunjokanma’s application for the entire hearing to be held in public. The starting point for these hearings is that they should be held in public. The panel carefully considered the representations that Ms Okondunjokanma has made, particularly in relation to members of her family. However, the panel was aware that the matters involved in this case are already in the public domain as a result of her Crown Court trial and sentencing hearing. The panel therefore decided that this hearing will be

held in public. However, if there is any reference to matters regarding Ms Okondunjokanma's health, those matters will be dealt with in private.

Background

Ms Okondunjokanma obtained a tenancy on 17 May 2004. She moved out of London in 2009/2010 and did not inform the council. Rather, she sub-let the tenancy to her sister.

On the 02 September 2016 at Woolwich Crown Court, Ms Okondunjokanma pleaded guilty to offences as set out below:

- Failure to disclose information to make a gain for yourself or another or to cause loss to another or expose another to a loss on 11 July 2009, contrary to the Fraud Act 2006 s.1(2)(b)+s.3;
- Sub-letting a dwelling let under an assured tenancy in breach of a term of tenancy from 15 October 2013 to 29 January 2016 contrary to the Prevention of Social Housing Fraud Act 2013 s.2(1);
- Obtaining services by deception contrary to the Theft Act 1978 s.1;

Ms Okondunjokanma was sentenced to 18 months' imprisonment. The circumstances are that Ms Okondunjokanma provided fraudulent documentation stating that she had leave to remain when she did not, and birth certificates for children that were not hers, in support of a Homeless application made on 31 December 2003. This was accepted as a result of a bribe provided to a corrupt council officer and she was provided with council housing (charge 3). She then left London in 2009/2010, which she failed to declare to the council (charge 1) and then sub-let the council housing to her sister (charge 2).

Decision on the findings on facts and reasons

Having been provided with a copy of the certificate of conviction, the panel finds that the facts are found proved in accordance with Rule 31 (2) which states:

31 (2) Where a registrant has been convicted of a criminal offence –

(a) a copy of the certificate of conviction, certified by a competent officer of a Court in the United Kingdom (or, in Scotland, an extract conviction) shall be conclusive proof of the conviction; and

(b) the findings of fact upon which the conviction is based shall be admissible as proof of those facts.

In reaching its decisions on the facts, the panel considered all the evidence adduced in this case together with the submissions made by Ms Hansen on behalf of the NMC.

The panel heard and accepted the advice of the legal assessor.

The panel was aware that the burden of proof rests on the NMC, and that the standard of proof is the civil standard, namely the balance of probabilities. This means that the facts will be proved if the panel was satisfied that it was more likely than not that the incidents occurred as alleged.

The panel has drawn no adverse inference from the non-attendance of Ms Okondunjokanma.

The panel considered each charge and made the following findings:

Charge 1:

1. Failure to disclose information to make a gain for yourself or another or to cause loss to another or expose another to a loss on 11 July 2009, contrary to the Fraud Act 2006 s.1(2)(b)+s.3;

This charge is found proved.

In considering this charge, the panel had regard to the certificate of conviction showing that Ms Okondunjokanma was convicted of failing to disclose information on 02 September 2016. The panel also noted that Ms Okondunjokanma has effectively admitted the substance of this charge, before the amendments, in the standard direction form (SDF), dated and signed by her on 13 December 2016.

The panel therefore found charge 1 proved.

Charge 2:

2. Sub-letting a dwelling let under an assured tenancy in breach of a term of tenancy from 15 October 2013 to 29 January 2016 contrary to the Prevention of Social Housing Fraud Act 2013 s.2(1);

This charge is found proved.

In reaching this decision, the panel took into account the certificate of conviction which shows that Ms Okondunjokanma was convicted of dishonestly sub-letting a house under secure tenancy on 02 September 2016. The panel also noted that Ms Okondunjokanma has effectively admitted the substance of this charge, before the amendments, in the SDF, dated and signed by her on 13 December 2016.

The panel therefore found charge 2 proved.

Charge 3:

3. Obtaining services by deception contrary to the Theft Act 1978 s.1;

In reaching this decision, the panel noted the certificate of conviction which shows that Ms Okondunjokanma was convicted of obtaining services by deception on 02 September 2016. The panel also noted that Ms Okondunjokanma has effectively admitted the substance of this charge, before the amendments, in the SDF, dated and signed by her on 13 December 2016.

The panel therefore found charge 3 proved.

Decision and reasons on impairment:

The panel then went onto consider whether, as a result of her conviction, Ms Okondunjokanma's fitness to practise is currently impaired.

The panel considered all of the evidence before it. It heard submissions from Ms Hansen. It accepted the advice of the legal assessor.

Ms Hansen submitted that fitness to practise is a matter for the panel having regard to the public interest in upholding public confidence in the profession and in the NMC as a regulator. She submitted that defrauding public money is a serious matter and there is a high public interest in this case.

Ms Hansen submitted that Ms Okondunjokanma has demonstrated serious and persistent dishonesty and the panel may surmise that this demonstration of dishonesty in her personal life may indicate that she would act dishonestly in her professional life. She submitted that she has breached one of the fundamental tenets of the profession in not acting with honesty and integrity.

Ms Hansen submitted that there is a risk of repetition in this case. She submitted that Ms Okondunjokanma has sought to go behind the facts of her conviction and has presented herself as a victim, placing the blame on her partner and stating that she did not know what was going on. Ms Hansen submitted that this demonstrates that she lacks insight into her previous conduct.

Ms Hansen set out the case contained within documents provided by Ms Okondunjokanma. She said that Ms Okondunjokanma states that she had only lived in the UK for two months at the time of her Homeless application and she did not know how such matters worked and did not know she was doing anything criminal. Ms Hansen also referred to the role of Ms Okondunjokanma's partner in the deception, which the sentencing judge found was greater than her own. Ms Hansen stated that Ms Okondunjokanma has admitted that her fitness to practise is impaired and so that demonstrates a degree of insight. She also referred to Ms Okondunjokanma's comment that she has "learned her lesson" and will not repeat her actions.

Ms Hansen invited the panel to find that Ms Okondunjokanma's fitness to practise is impaired on the grounds of it being necessary to satisfy the public interest.

Nurses occupy a position of privilege and trust in society and are expected at all times to be professional and to maintain professional boundaries. Patients and their families must be able to trust nurses with their lives and the lives of their loved ones. To justify that trust, nurses must be honest and open and act with integrity. They must make sure that their conduct at all times justifies both their patients' and the public's trust in the profession. In this regard the panel considered the judgement of Mrs Justice Cox in the case of *Council for Healthcare Regulatory Excellence v (1) Nursing and Midwifery Council (2) Grant* [2011] EWHC 927 (Admin) in reaching its decision, in paragraph 74 she said:

In determining whether a practitioner's fitness to practise is impaired by reason of misconduct, the relevant panel should generally consider not

only whether the practitioner continues to present a risk to members of the public in his or her current role, but also whether the need to uphold proper professional standards and public confidence in the profession would be undermined if a finding of impairment were not made in the particular circumstances.

Mrs Justice Cox went on to say in Paragraph 76:

I would also add the following observations in this case having heard submissions, principally from Ms McDonald, as to the helpful and comprehensive approach to determining this issue formulated by Dame Janet Smith in her Fifth Report from Shipman, referred to above. At paragraph 25.67 she identified the following as an appropriate test for panels considering impairment of a doctor's fitness to practise, but in my view the test would be equally applicable to other practitioners governed by different regulatory schemes.

Do our findings of fact in respect of the doctor's misconduct, deficient professional performance, adverse health, conviction, caution or determination show that his/her fitness to practise is impaired in the sense that s/he:

- a. ...*
- b. has in the past brought and/or is liable in the future to bring the medical profession into disrepute; and/or*
- c. has in the past breached and/or is liable in the future to breach one of the fundamental tenets of the medical profession; and/or*
- d. has in the past acted dishonestly and/or is liable to act dishonestly in the future.*

Ms Okondunjokanma has three convictions which centre around dishonesty and which took place over a not inconsiderable period of time. The panel therefore found that she has in the past acted dishonestly, breached fundamental tenets of the profession and brought the nursing profession into disrepute.

In the panel's view Ms Okondunjokanma's three convictions are serious. They represent sustained and highly dishonest conduct by Ms Okondunjokanma involving fraudulent documentation and obtaining by deception the use of council housing. This took place over a long period of time, from 2004 onwards and appearing in court in 2016. From around 2009, Ms Okondunjokanma allowed her sister to live in a council tenanted property to which she was not entitled. As a result of her actions, there was a loss to the public purse estimated at around £100,000 and Ms Okondunjokanma received an immediate prison sentence of 18 months.

The panel has no evidence before it of any steps taken by Ms Okondunjokanma to remediate her actions. The panel noted that it is hard to remediate dishonesty. The panel noted that there are different scales of dishonesty however Ms Okondunjokanma's is at the higher end of the scale.

The panel assessed the level of insight that Ms Okondunjokanma has shown with regard to her actions. It noted that Ms Okondunjokanma, who was legally represented at the Crown Court, pleaded guilty at her criminal trial and admitted the facts in relation to these proceedings; she has also accepted that her fitness to practise is impaired as a result of her convictions. The panel noted that Ms Okondunjokanma claimed that she did not know that what she was doing was criminal and has minimised her own role, stating that her partner played the central role in the deception. The panel took into account the judge's sentencing remarks, made in full knowledge of the mitigation put forward on her behalf Ms Okondunjokanma, which state "It is not possible to suspend any of these sentences...each of them involves serious and persistent dishonesty that went on over a long period of time and caused substantial loss to the London Borough of Southwark and therefore ultimately to the taxpayer."

The panel also noted that Ms Okondunjokanma has continued to portray herself as the victim in her emails and statements to the NMC. In her letter dated 24 April 2017 she states “Having gone through the trauma of crown court, imprisonment and compensation of £20,000 paid to Southwark council for a case I’m only a victim of circumstance”. Whilst Ms Okondunjokanma states “I made [a] mistake and I am very sorry about it”, the panel was of the view that she has not taken responsibility for her role in her crime and she has not reflected on the impact of her crime on the reputation of her profession or the consequences to the public of her crime itself.

In conclusion, the panel took the view that this case is very serious. It decided that Ms Okondunjokanma’s actions fell significantly short of what the public would expect of a registered nurse, which is to act with honesty and integrity. It concluded that she had breached a fundamental tenet of the profession and brought the profession into disrepute. The panel was of the view that the public would not expect a registered nurse who has been convicted of multiple counts of dishonesty to return to unrestricted practice.

The panel bore in mind the overarching objective of the NMC: to protect, promote and maintain the health safety and well-being of the public and patients and the wider public interest which includes promoting and maintaining public confidence in the nursing and midwifery professions and upholding the proper professional standards for members of those professions.

Having regard to all of the above, the panel was satisfied that Ms Okondunjokanma’s fitness to practise is currently impaired on public interest grounds.

Determination on sanction:

The panel has considered this case very carefully and has decided to make a striking-off order. It directs the registrar to strike Ms Okondunjokanma off the register. The effect of this order is that the NMC register will show that Ms Okondunjokanma has been struck-off the register.

In reaching this decision, the panel has had regard to all the evidence that has been adduced in this case.

The panel had regard to the submissions of Ms Hansen who submitted that sanction is a matter for the panel's judgement having regard to the need to maintain proper standards of conduct and performance and to uphold public confidence in the profession and in the NMC as its regulator.

Ms Hansen submitted that, although Ms Okondunjokanma has been released from prison, her sentence of 18 months has not yet been completed and asked the panel to bear this in mind.

The panel has also had regard to all the written representations made by Ms Okondunjokanma in relation to this case generally.

The panel accepted the advice of the legal assessor. The panel has borne in mind that any sanction imposed must be appropriate and proportionate and, although not intended to be punitive in its effect, may have such consequences. The panel had regard to the Indicative Sanctions Guidance ("ISG") published by the NMC. It recognised that the decision on sanction is a matter for the panel, exercising its own independent judgement.

The panel identified the following aggravating factors:

- There are three convictions, each involving dishonesty, and which fall far below the standards expected of a registered nurse.
- The dishonesty was serious, repeated and persistent and took place over significant period of time;
- Ms Okondunjokanma's actions had a significant impact upon the public purse resulting in the loss of approximately £100,000.

Given that this case involves the aggravating feature of dishonesty, the panel had regard to ISG which deals specifically with dishonesty:

36 Dishonesty, even where it does not result in direct harm to patients but is related to matters outside of a nurse or midwife's professional practice, for example, fraudulent claims for monies, is particularly serious because it can undermine the trust the public place in the profession. Honesty, integrity and trustworthiness are to be considered the bedrock of any nurse or midwife's practice.

The panel identified the following mitigating factors:

- Ms Okondunjokanma has demonstrated some insight in pleading guilty at her criminal trial, accepting the charges in these proceedings and accepting that her fitness to practise is impaired by reason of her convictions.

The panel first considered whether to take no action but concluded that this would be manifestly inappropriate in view of the seriousness of the case. The panel decided that it would be neither proportionate nor in the public interest to take no further action.

Next, in considering whether a caution order would be appropriate in the circumstances, the panel took into account the ISG, which states that a caution order may be appropriate where *'the case is at the lower end of the spectrum of impaired fitness to practise and the panel wishes to mark that the behaviour was unacceptable and must not happen again.'* The panel considered that Ms Okondunjokanma's conduct was not at the lower end of the spectrum and that a caution order would be inappropriate in view

of the seriousness of the case. The panel decided that it would be neither proportionate nor in the public interest to impose a caution order.

The panel next considered a conditions of practice order but decided that this would be inappropriate. There are no clinical issues in this case. Ms Okondunjokanma's fitness to practise has been found to be impaired on public interest grounds rather than on grounds of public protection. This case is serious and the panel determined that a conditions of practice order would not satisfy the public interest. In any event, the panel could not formulate any conditions that would address the serious dishonesty in this case.

The panel then went on to consider whether a suspension order would be an appropriate sanction. Paragraph 68 of the ISG indicates:

68 This sanction may be appropriate where the misconduct is not fundamentally incompatible with continuing to be a registered nurse or midwife in that the public interest can be satisfied by a less severe outcome than permanent removal from the register. This is more likely to be the case when some or all of the following factors are apparent (this list is not exhaustive):

68.1 A single instance of misconduct but where a lesser sanction is not sufficient.

68.2 No evidence of harmful deep-seated personality or attitudinal problems.

68.3 No evidence of repetition of behaviour since the incident.

68.4 The panel is satisfied that the nurse or midwife has insight and does not pose a significant risk of repeating behaviour.

The panel noted that there was not one instance of dishonesty in this case but three offences of dishonesty which took place over a long period of time. The panel was not satisfied that Ms Okondunjokanma has developed sufficient insight into her offending. The panel determined that this is not a case where a period of suspension from the register would serve to satisfy the public interest. The panel determined that a

suspension order was not sufficient in order to safeguard the NMC's reputation as a regulator and to uphold and maintain the proper standards of conduct and behaviour.

Finally, in looking at a striking-off order, the panel had regard to the following paragraphs of the ISG:

71.1 Is striking-off the only sanction which will be sufficient to protect the public interest?

71.2 Is the seriousness of the case incompatible with ongoing registration?

71.3 Can public confidence in the professions and the NMC be sustained if the nurse or midwife is not removed from the register?

The panel answered the three questions above in the affirmative.

72 This sanction is likely to be appropriate when the behaviour is fundamentally incompatible with being a registered professional, which may involve any of the following (this list is not exhaustive):

72.6 Dishonesty, especially where persistent...

72.8 Convictions or cautions involving any of the conduct or behaviour set out above

Ms Okondunjokanma has made fraudulent claims leading to her obtaining a property from Southwark Council which she sub-let to her sister, which resulted in a substantial financial loss to the Council and, ultimately, to the public. Ms Okondunjokanma has received three convictions and 18 months' immediate imprisonment as a result of these crimes. The seriousness of the dishonesty led the panel to conclude that Ms Okondunjokanma's behaviour is fundamentally incompatible with being a registered professional. The panel is of the view that the public would expect Ms Okondunjokanma

to be removed from the NMC's register as a result of her actions. The panel is of the view that a striking off order is the only sanction that would satisfy the public interest in order to maintain public confidence in the profession and the NMC as its regulatory body.

The panel noted that this may have a punitive effect on Ms Okondunjokanma in that it may have a detrimental financial impact on her and will prevent her from working in her chosen profession. However, Ms Okondunjokanma's actions fell far below the standards expected of a registered nurse and the panel was of the view that the public interest far outweighed Ms Okondunjokanma's interests in this respect.

Determination on Interim Order

The panel has considered the submissions made by Ms Hansen that an interim order should be made on the grounds that it is otherwise in the public interest.

The panel accepted the advice of the legal assessor.

The panel was satisfied that an interim suspension order is required to satisfy the public interest. The panel was aware that there is a high bar for imposing interim orders solely on public interest grounds. However, the panel had regard to the seriousness of Ms Okondunjokanma's convictions and to the reasons set out in its decision for the substantive order, and was of the view that this high bar has been met. Not to impose an interim suspension order would be incompatible with its earlier findings and would undermine public confidence in the profession and the NMC as its regulator.

The period of this order is for 18 months to allow for the possibility of an appeal to be made and determined.

If no appeal is made, then the interim order will be replaced by the striking-off order 28 days after Ms Okondunjokanma is sent the decision of this hearing in writing.

That concludes this determination.