

**Nursing and Midwifery Council
Investigating Committee**

**Fraudulent/Incorrect Entry Hearing
Tuesday 30 December 2025**

Virtual Meeting

Name of registrant:	Sonia Jane Tudor
NMC PIN:	12I0994E
Part(s) of the register:	Registered Nurse – Adult
Type of case:	Fraudulent/Incorrect entry
Panel members:	Christopher Taylor (Chair, Registrant member) Kathryn Evans (Registrant member) Cheryl Hobson (Lay member)
Legal Assessor:	Richard Ferry-Swainson
Hearings Coordinator:	Maya Khan
Facts proved:	Charges 1 and 2
Outcome:	Entry onto NMC Register fraudulently procured
Direction:	The panel directs the NMC Registrar to remove Mrs Tudor's entry on the NMC Register in accordance with Article 26(7) of the Order
Interim order:	Interim suspension order (18 months)

Service of Notice of Meeting

The panel was provided with a copy of the notice for this meeting that was sent to Mrs Tudor's registered email address by secure email on 18 November 2025.

The notice of meeting informed Mrs Tudor that a meeting would be held on or after 23 December 2025. It detailed the charges against her and enclosed the bundle of evidence that the panel would consider. It also informed her that if she wished to provide a written response, she should do so no later than 22 December 2025. The panel had regard to the attempts made by the NMC to secure Mrs Tudor's engagement by email, telephone and post. Mrs Tudor had not responded to those communications or the notice of meeting, nor had she provided any written response to the notice.

The panel accepted the advice of the legal assessor.

In the light of the information available, the panel was satisfied with service in this case.

Details of charge

That you

1. On your online application for revalidation dated 31 March 2025, stated you had a reflective discussion with Colleague A on 31 March 2025 when no such reflective discussion had taken place.
2. On your online application for revalidation dated 31 March 2025, stated that you had received confirmation from Colleague A on 31 March 2025 when you had not received such confirmation.

And thereby an entry on sub part 1 of the NMC register in the name of Mrs Sonia Jane Tudor, NMC PIN 12I0994E was fraudulently procured/incorrectly made.

Background

To remain on the NMC register, a nurse, midwife, or nursing associate in England must renew their registration every three years. To renew their registration, nurses, midwives and nursing associates have to pay a fee and complete an online

revalidation submission, declaring that they have complied with the revalidation requirements.

Nurses, midwives and nursing associates are required to complete their revalidation via their NMC online account. The information is then uploaded on to the NMC's Workflow and Imaging System for Effective Regulation (WISER). In 2020 the NMC started migrating over to a new database system known as Microsoft Dynamics 365 system (MSD) and now information is uploaded from their NMC online account to MSD.

The purpose of revalidation is to give nurses, midwives and nursing associates the opportunity to inform the NMC that they have completed the required number of registered practice hours and continuing professional development (CPD). In addition, nurses, midwives and nursing associates are asked to declare whether they are of good health and character and in particular whether they have been made the subject of any police charge, conviction or caution. If the nurse, midwife, or nursing associate states that they have completed the required CPD, practice hours and paid the fee, their registration will be renewed on WISER, subject to the assessment of any criminal charges, convictions or cautions which may have been declared.

Registration lasts for 3 years however nurses must pay their annual fee, or their registration will lapse. Declarations of charges, cautions and convictions are formally considered at the NMC by the Registrar or Assistant Registrar. As part of the process the Registrar or Assistant Registrar may ask the professional opinion of colleagues and/or others, prior to making their decision.

When completing her online revalidation on 31 March 2025, Mrs Tudor answered "YES" to the declaration: "*I declare that I've had a reflective discussion with an NMC registered nurse, midwife or nursing associate in line with 'How to revalidate'.*" Mrs Tudor then provided Colleague A's name, email, work address and telephone number and recorded the date of the discussion as 31 March 2025. She also answered "YES" to the box that states: "*The above named nurse/midwife/nursing associate has given their consent to be contacted by the NMC if needed to verify the information I've provided, and I agree for this nurse/midwife/nursing associate to be contacted by the NMC for this reason.*"

Under the heading tilted 'Confirmation', Mrs Tudor again provided Colleague A's details as the person confirming that she had met the revalidation requirements.

A statement from an NMC Registrations Manager, detailed the revalidation process and explained how none of the answers on the form are pre-populated, so all have to be manually entered by the registrant completing the form. He exhibited screenshots from the form completed by Mrs Tudor on 31 March 2025.

On 9 April 2025, the NMC received a call from Colleague A stating that he received an automated email thanking him for confirming Mrs Tudor's revalidation application and he called to dispute this as he did not agree to be her confirmor.

Colleague A then sent a follow up email on 9 April 2025 to reiterate that he did not assist with Mrs Tudor's revalidation. Colleague A explained that he used to work with Mrs Tudor at Cygnet Hospital Derby and he did support her by acting as her reflective discussion partner and confirmor for her previous revalidation in 2022. However, Mrs Tudor left Cygnet shortly after the previous revalidation, three years ago and Colleague A has not had contact with her since. Colleague A is unaware of where Mrs Tudor is currently employed or whether she meets the requirements for the revalidation of her registration.

As a result, the NMC opened this case on 12 May 2025 to investigate these concerns.

Decision and reasons on the facts

In reaching its decisions on the disputed facts, the panel took into account all the documentary evidence in this case which included: the statement from the NMC's registrations manager and Mrs Tudor's online revalidation application form.

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 a fact will be proved if a panel is satisfied that it is more likely than not that the incident occurred as alleged.

The panel also had regard to the written statement of the following witness:

- Colleague A, employed by Cygnet Hospital Derby as a Senior Staff Nurse and worked as a staff nurse with Mrs Tudor in 2022

Before making any findings on the facts, the panel heard and accepted the advice of the legal assessor.

Charge 1

On your online application for revalidation dated 31 March 2025, stated you had a reflective discussion with Colleague A on 31 March 2025 when no such reflective discussion had taken place.

This charge is found PROVED.

In reaching its decision, the panel considered Mrs Tudor's revalidation application form in which Mrs Tudor selected 'yes' to the statement: *'I declare that I've had a reflective discussion with an NMC registered nurse, midwife or nursing associate online with 'How to revalidate'.'*

Mrs Tudor then provided Colleague A's name, email, work address and telephone number and recorded the date of the discussion as 31 March 2025. She also answered "YES" to the box that states: *"The above named nurse/midwife/nursing associate has given their consent to be contacted by the NMC if needed to verify the information I've provided, and I agree for this nurse/midwife/nursing associate to be contacted by the NMC for this reason."*

The panel also considered Colleague A's witness statement which stated:

'I do not recall when I first met Sonia or when she first joined Cygnet Hospital Derby, however, we both worked as Staff Nurses on the Litchurch Ward. We were colleagues who used to occasionally see each other during our shifts and I helped Sonia with her revalidation application in 2022, acting as her confirmer and reflective discussion partner.'

On 31 March 2025, I received a no reply email from the NMC thanking me for supporting Sonia with her revalidation. I was confused and thought this may have

been a mistake given my role in her previous revalidation. After checking the date, I called the NMC to advise them that I did not act as Sonia's confirmor or reflective discussion partner in 2025. I then sent a follow-up email to the NMC on 04 April 2025...'.

In light of all the evidence, the panel was satisfied that the NMC had discharged the burden of proof and that Mrs Tudor had stated she had a reflective discussion with Colleague A on 31 March 2025 when no such reflective discussion had taken place. It therefore found this charge proved.

Charge 2

On your online application for revalidation dated 31 March 2025, stated that you had received confirmation from Colleague A on 31 March 2025 when you had not received such confirmation.

This charge is found PROVED.

In reaching its decision, the panel considered Mrs Tudor's revalidation application form in which Mrs Tudor selected 'yes' to the statement: '*The above named nurse/midwife/nursing associate has given their consent to be contacted by the NMC if needed to verify the information I've provided, and I agree for this nurse/midwife/nursing associate to be contacted by the NMC for this reason.*'

Under the heading titled 'Confirmation', Mrs Tudor again provided Colleague A's details as the person confirming that she had met the revalidation requirements.

The panel also considered Colleague A's witness statement which stated:

'Shortly after her 2022 revalidation, due to COVID I was clinically vulnerable and not working on the ward. Upon my return, I believe Sonia left Cygnet Hospital Derby. However, she may still be a part of the bank staff but I am unsure.'

On 31 March 2025, I received a no reply email from the NMC thanking me for supporting Sonia with her revalidation. I was confused and thought this may have been a mistake given my role in her previous revalidation. After checking the

date, I called the NMC to advise them that I did not act as Sonia's confirmer or reflective discussion partner in 2025. I then sent a follow-up email to the NMC on the 4 April 2025...

I did not speak to Sonia about this at any point as I have not seen her since and I am not aware whether she knows of this investigation.'

In light of all the evidence, the panel was satisfied that the NMC had discharged the burden of proof and that Mrs Tudor had stated that she had received confirmation from Colleague A on 31 March 2025 when she had not received such confirmation.

Decision on fraudulently/incorrect entry

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

Having found charges 1- 2 proved, the panel focused on whether the entry was incorrectly made or fraudulently procured.

The panel had regard to the NMC's Guidance on Fraudulent or Incorrect entry to the Register (the Guidance). It noted that it had no information from Mrs Tudor.

The panel first considered if the decision to allow renewal of Mrs Tudor's registration was based on wrong information. Mrs Tudor's revalidation form shows that she selected the option 'yes' to the statements:

- *'I declare that I've had a reflective discussion with an NMC registered nurse, midwife or nursing associate in line with 'How to revalidate'.*
- *'The above named nurse/midwife/nursing associate has given their consent to be contacted by the NMC if needed to verify the information I've provided, and I agree for this nurse/midwife/nursing associate to be contacted by the NMC for this reason.'*

The panel then considered if Mrs Tudor's entry was fraudulently procured.

The panel noted the NMC guidance titled 'Incorrect or Fraudulent entry' that states '*An allegation that an entry has been made fraudulently will always involve an element of dishonesty.*'

The panel noted that Mrs Tudor had completed her revalidation form in 2025 and had not been in contact with Colleague A since 2022. It further noted that the online application form was not pre-populated and there are prompts to check the accuracy of the information, Mrs Tudor would have deliberately inserted Colleague A's details which he did not consent to.

The panel concluded that Mrs Tudor did intend to mislead the NMC when completing her revalidation declaration.

The panel determined, on the balance of probabilities, that Mrs Tudor had deliberately submitted an inaccurate online application form for the purposes of misleading the NMC Registrar and fraudulently procuring her entry on the NMC Register.

The panel therefore found Mrs Tudor's entry on the NMC Register to be fraudulently procured.

Decision and reasons on direction

Having determined that Mrs Tudor had incorrectly and fraudulently procured an entry on the NMC's register, the panel went on to decide what direction, if any, to make under Article 26(7) of the 'Nursing and Midwifery Order 2001' (the Order).

Article 26(7) states:

'...If the Investigating Committee is satisfied that an entry in the register has been fraudulently procured or incorrectly made, it may make an order that the Registrar remove or amend the entry and shall notify the person concerned of his right of appeal under article 38.'

The panel bore in mind its overarching duty, namely the protection of the public and its duty to protect the public interest, in particular to uphold the integrity of the register.

Firstly, the panel determined that Mrs Tudor's case is not one in which it would be appropriate to take no action. The panel considered that the issue in question is not trivial or immaterial.

The panel went on to consider whether the entry on the register should be amended, however this case does not involve an error on the register that can simply be amended, such as a typographical error.

The panel therefore carefully considered whether to direct that Mrs Tudor's entry from the register be removed. The panel took into account the NMC's guidance in respect of making an order to remove the entry where it states:

'The fact that the person's application to gain, maintain or renew their registration was supported by deliberately misleading information is likely to be a strong factor in favour of removing the entry because our duty to maintain the register is a vital part of protection of the public.'

The panel determined that it is necessary to direct that Mrs Tudor's entry be removed from the register. It had regard to the fact that the false information provided by Mrs Tudor on her online application was neither trivial nor immaterial. The panel recognised the importance of maintaining the integrity of the NMC Register.

The panel reminded itself that it is not the function of the Investigating Committee to determine whether or not Mrs Tudor now meets the relevant entry requirements to be on the NMC Register. This is the function of the NMC Registrar. The panel draws Mrs Tudor's attention to the NMC Guidance that states:

'If their entry is removed, the person concerned can subsequently apply for registration. If they do this, the Registrar (or one of our Assistant Registrars who also make decisions on behalf of the Registrar) can make a new registration decision, using their specialism and our health and character guidance to help them reach the right decision.'

The panel considered that, should Mrs Tudor make a further application for readmission to the NMC Register, the NMC Registrar should be afforded an opportunity to consider her suitability to be on the NMC register, taking account of all the relevant information.

The panel decided to direct the NMC Registrar to remove Mrs Tudor entry on the NMC Register in accordance with Article 26(7) of the Order.

Mrs Tudor will be notified of the panel's decision in writing. Mrs Tudor has the right to appeal the decision under Article 38 of the Order.

This direction does not take effect until the end of 28 days from the date on which Mrs Tudor receives notice of the decision or, if an appeal is made, until the appeal has been determined.

Decision and reasons on interim order

Having directed that the Registrar remove Mrs Tudor's entry from the NMC Register, the panel then considered whether an interim order was required under Article 26(11) of the Order, in relation to the appeal period.

In reaching its decision on whether to impose an interim order, the panel had regard to the reasons set out in its decision on the facts and its decision to direct the Registrar to remove Mrs Tudor's entry from the Register. It also had regard to the NMC's published Guidance on Fraudulent and Incorrect entry cases. It noted that the imposition of an interim order is not an automatic outcome but is a matter for the panel's discretion in the circumstances of the case, having regard to the public interest in maintaining the integrity of the register. It also had regard to Article 31 of the Order and the NMC's Guidance on interim orders.

The panel bore in mind that the matters found proved in this case are serious. However, it concluded that there was no evidence of any specific public protection concerns and the concerns do not relate to Mrs Tudor's clinical practice, but rather her integrity. Whilst the panel considered that although an interim order on this ground may be desirable, there is insufficient evidence before it to establish a risk of harm. Accordingly, the panel concluded that an interim order is not necessary on the ground of public protection.

The panel then considered the public interest in this matter. It was of the view that serious damage to public confidence in the profession and in the NMC as the regulator would be caused if a registrant were allowed to practise without any restriction following a finding of fraudulent entry in the NMC register, and a direction for removal. The panel

noted that the revalidation process is to reassure members of the public of the integrity of the NMC register. Accordingly, the panel determined that an interim order is required on the sole ground of public interest. The panel further recognised that the threshold for an order on public interest grounds alone is high. It took the view that the seriousness of Mrs Tudor's dishonesty in this case meets that high threshold.

The panel first considered whether to impose an interim conditions of practice order. It determined that an interim conditions of practice order is not appropriate in this case as it would be inconsistent with the panel's direction to remove Mrs Tudor's entry from the register to allow her to practise pending any appeal.

Accordingly, the panel determined that an interim suspension order is necessary in the public interest to protect the reputation of the profession, the integrity of the register and the NMC as 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 lapse upon the removal of Mrs Tudor's entry in the Register 28 days after she is sent the decision of this hearing in writing.

That concludes this determination.