

**Nursing and Midwifery Council
Fitness to Practise Committee**

**Substantive Order Review Hearing
Friday 20 February 2026**

Virtual Hearing

Name of Registrant: Angela Unufe-Eguakhide

NMC PIN: 15F0050C

Part(s) of the register: Registered Nurse – Sub Part 1
Learning Disabilities – 2 June 2015

Relevant Location: Nottinghamshire

Type of case: Misconduct

Panel members: Serene Rollins (Chair, Lay member)
Charlotte Cooley (Registrant member)
Ray Salmon (Lay member)

Legal Assessor: Gillian Hawken

Hearings Coordinator: Jumu Ahmed

Nursing and Midwifery Council: Represented by Nawazish Choudhury, Case
Presenter

Mrs Unufe-Eguakhide: Not present and not represented in the hearing

Order being reviewed: Conditions of practice order (12 months)

Fitness to practise: Impaired

Outcome: **Conditions of practice order (12 months) to
come into effect on 27 March 2026 in
accordance with Article 30 (1)**

Decision and reasons on service of Notice of Hearing

The panel was informed at the start of this hearing that Mrs Unufe-Eguakhide was not in attendance and that the Notice of Hearing had been sent to Mrs Unufe-Eguakhide's registered email address by secure email on 21 January 2026.

Further, the panel noted that the Notice of Hearing was also sent to Mrs Unufe-Eguakhide's representative at the Royal College of Nursing (RCN) on 21 January 2026.

Mr Choudhury, on behalf of the Nursing and Midwifery Council (NMC), submitted that it 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.

The panel took into account that the Notice of Hearing provided details of the substantive order being reviewed, the time, date and that the hearing was to be held virtually, including instructions on how to join and, amongst other things, information about Mrs Unufe-Eguakhide's right to attend, be represented and call evidence, as well as the panel's power to proceed in her absence.

In the light of all of the information available, the panel was satisfied that Mrs Unufe-Eguakhide has been served with notice of this hearing in accordance with the requirements of Rules 11 and 34.

Decision and reasons on proceeding in the absence of Mrs Unufe-Eguakhide

The panel next considered whether it should proceed in the absence of Mrs Unufe-Eguakhide. The panel had regard to Rule 21 and heard the submissions of Mr Choudhury who invited the panel to continue in the absence of Mrs Unufe-Eguakhide. He submitted that the RCN, on behalf of Mrs Unufe-Eguakhide, had stated that she had received the notice of the hearing and is happy for the hearing to proceed in her absence.

Mr Choudhury referred the panel to the email from the RCN dated 10 February 2026. It stated:

'Mrs Unufe-Eguakhide will not be attending the hearing nor will she be represented. No disrespect is intended by her non-attendance. Mrs Unufe-Eguakhide has received the notice of hearing and is happy for the hearing to proceed in her absence. She remains engaged with the proceedings.'

The panel accepted the advice of the legal assessor.

The panel has decided to proceed in the absence of Mrs Unufe-Eguakhide. In reaching this decision, the panel has considered the submissions of Mr Choudhury, the representations made on Mrs Unufe-Eguakhide's behalf, and the advice of the legal assessor. It has had particular regard to relevant case law and to the overall interests of justice and fairness to all parties. It noted that:

- No application for an adjournment has been made by Mrs Unufe-Eguakhide;
- The RCN, on Mrs Unufe-Eguakhide's behalf, has informed the NMC that she has received the Notice of Hearing and confirmed she is content for the hearing to proceed in her absence;
- The RCN has provided the panel with written representations;
- There is no reason to suppose that adjourning would secure her attendance at some future date; and
- There is a strong public interest in the expeditious review of the case.

It is noted that proceeding in the absence of a registrant could cause some disadvantage to her but bearing in mind the circumstances mentioned above, the panel has decided that it is fair to proceed in the absence of Mrs Unufe-Eguakhide.

Decision and reasons on review of the substantive order

The panel decided to extend the current conditions of practice order.

This order will come into effect at the end of 27 March 2026 in accordance with Article 30(1) of the 'Nursing and Midwifery Order 2001' (the Order).

This is the first review of a substantive conditions of practice order originally imposed for a period of 12 months by a Fitness to Practise Committee panel on 27 February 2025.

The current order is due to expire at the end of 27 March 2026.

The panel is reviewing the order pursuant to Article 30(1) of the Order.

The charges found proved and by way of admission which resulted in the imposition of the substantive order were as follows:

That you, a registered nurse:

1. On an unknown date,
 - a. ...
 - b. ...
 - i. ...
 - ii. ...
 - c. ...
 - d. ...
 - e. ...
 - f. Overrode the decision by a consultant psychiatrist to rescind a patient's community leave.
2. In February 2021, failed to maintain professional boundaries with Patient A, namely that you,
 - a. Provided your personal email and telephone number to them.
 - b. Exchanged a number of text messages with them that were outside of your professional capacity.
3. On 17 February 2021, during a community meeting, behaved inappropriately by referring to the person who complained about you as a coward.

4. On 18 February 2021, in relation to Patient B,
 - a. Caused distress by instructing staff to:
 - i. Remove their soft toy from them.
 - ii. Restrain them.
Without clinical justification
 - b. Did not consult with the multi-disciplinary team before instructing staff to:
 - i. Remove their soft toy from them.
 - ii. Restrain them.

And in light of the above, your fitness to practise is impaired by reason of your misconduct.

The original panel determined the following with regard to impairment:

'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 judgment of Mrs Justice Cox in the case of CHRE v NMC and Grant 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.'

In paragraph 76, Mrs Justice Cox referred to Dame Janet Smith's "test" which reads as follows:

'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) has in the past acted and/or is liable in the future to act so as to put a patient or patients at unwarranted risk of harm; and/or*
- 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.'*

The panel considers that limbs a, b and c are engaged the above test in relation to the charges.

The panel finds that patients were put at risk of harm as a result of your misconduct. Your misconduct had breached the fundamental tenets of the nursing profession and therefore brought its reputation into disrepute. It was satisfied that confidence in the nursing profession would be undermined if its regulator did not find the charges, as proved, extremely serious.

In relation to charges regarding professional boundaries, the panel consider that your insight is well developed. You have provided evidence of training and understanding of your learnings.

[PRIVATE], the panel consider that your insight is still developing. It had regard to

your detailed reflection [PRIVATE], however you have not mentioned the impacts your actions have had upon patients, colleagues and the profession.

The panel was satisfied that the misconduct in this case is capable of being addressed. The panel had sight of several testimonials in which you and your practise has been described as 'empathetic', always ready to support your patients and 'diligently committed' to helping those less fortunate than yourself. The testimonials are from colleagues in different roles and workplaces and speak to your character and professionalism as a nurse. The panel also took into account that you have undertaken training modules in 'Communication Skills for Professionals' and 'Professional Boundaries in Health and Social Care', however did not see evidence of training in relation to dealing with vulnerable patients or working with multidisciplinary teams.

However, the panel is of the view that there is a risk of repetition based on your developing insight [PRIVATE], the removal of Floppity and restraint without clinical justification. It is also of the view that there remains a risk due to your limited remediation. The panel therefore decided that a finding of impairment is necessary on the grounds of public protection.

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

The panel was of the view that a reasonable and well-informed member of the public would be concerned if a finding of impairment was not found, and as such, determined that a finding on public interest grounds is also necessary.

Having regard to all of the above, the panel was satisfied that your fitness to practise is currently impaired.'

The original panel determined the following with regard to sanction:

The panel took into account the following aggravating features:

- *Your behaviour was an abuse of position of trust in that at the time the charges arose, you were a senior member of staff; and*
- *A vulnerable patient was caused distress as a result of your misconduct.*

The panel also took into account the following mitigating features:

- *You made admissions to some of the charges at the outset of these regulatory proceedings;*
- *You have demonstrated insight into some of your failings;*
- *[PRIVATE]; and*
- *The panel have before it a number of positive testimonials attesting to your good character and practise as a registered nurse.*

The panel next considered the NMC's submission that your misconduct is indicative of a deep seated attitudinal issue. [PRIVATE]. It considered the fact that, at the time the misconduct arose, you were newly promoted and working within newly established ward, which the panel heard evidence was challenging. Additionally, the panel noted that no previous concerns have ever been raised regarding your attitude whilst you were practicing as a registered nurse. In light of this information, and when considering the context surrounding your behaviour, the panel determined that the misconduct was ill informed and as a result of poor judgement rather a consequence of any deep seated attitudinal issue.

The panel next considered whether to take no action but concluded that this 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 take no further action.

It then considered the imposition of a caution order but again determined that, due to the seriousness of the case, and the public protection issues identified, an order that does not restrict your practice would not be appropriate in the circumstances. The SG 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 your misconduct was not at the lower end of the spectrum and that a caution order would be inappropriate in view of the issues identified. The panel decided that it would be neither proportionate nor in the public interest to impose a caution order.

The panel next considered whether placing conditions of practice on your registration would be a sufficient and appropriate response. The panel is mindful that any conditions imposed must be proportionate, measurable and workable. The panel took into account the SG, in particular:

- No evidence of harmful deep-seated personality or attitudinal problems;*
- Identifiable areas of the nurse or midwife’s practice in need of assessment and/or retraining;*
- No evidence of general incompetence;*
- Potential and willingness to respond positively to retraining;*
- Patients will not be put in danger either directly or indirectly as a result of the conditions;*
- The conditions will protect patients during the period they are in force;*
and
- Conditions can be created that can be monitored and assessed.*

The panel determined that it would be possible to formulate appropriate and practical conditions which would address the failings highlighted in this case. The panel accepted that you would be willing to comply with conditions of practice, given your engagement with these proceedings, your ongoing interest in health care and your hope to return to nursing practice. It also had regard to the fact that, other than these incidents, there is no evidence of any previous concerns having ever been raised regarding your practice as a registered nurse. The panel was of the view that it was in the public interest that, with appropriate safeguards, you should be able to return to practise as a nurse.

Balancing all of these factors, the panel determined that that the appropriate and proportionate sanction is that of a conditions of practice order.

The panel did seriously consider imposing a suspension order given the seriousness of the case and the public interest in this regard. However, the panel determined, on balance, that the public interest concerns identified in your case, can be addressed by way of a lesser sanction.

Having regard to the matters it has identified, the panel has concluded that a conditions of practice order will mark the importance of maintaining public confidence in the profession, and will send to the public and the profession a clear message about the standards of practice required of a registered nurse. The panel determined that a fully informed member of the public would be satisfied by the imposition of a conditions upon your practice.

The panel determined that the following conditions are appropriate and proportionate in this case:

'For the purposes of these conditions, 'employment' and 'work' mean any paid or unpaid post in a nursing, midwifery or nursing associate role. Also, 'course of study' and 'course' mean any course of educational study connected to nursing, midwifery or nursing associates.

- 1. You must not be the nurse in charge on any shift.*
- 2. You must be indirectly supervised, working at all times on the same shift as, but not always directly observed by another registered nurse.*
- 3. You must meet with your line manager, mentor and/or supervisor on a monthly basis to discuss the following areas of your practice:*
 - a) Working with vulnerable patients*
 - b) Working within a multidisciplinary team*
- 4. You must work with your line manager, mentor and/or supervisor to*

create a personal development plan (PDP). Your PDP must address the concerns about:

- a) Working with vulnerable patients*
- b) Working within a multidisciplinary team*

5. You must send a copy of your PDP to the NMC before any review hearing.

6. You must keep us informed about anywhere you are working by:

- a) Telling your case officer within seven days of accepting or leaving any employment.*
- b) Giving your case officer your employer's contact details.*

7. You must keep us informed about anywhere you are studying by:

- a) Telling your case officer within seven days of accepting any course of study.*
- b) Giving your case officer the name and contact details of the organisation offering that course of study.*

8. You must immediately give a copy of these conditions to:

- a) Any organisation or person you work for.*
- b) Any agency you apply to or are registered with for work.*
- c) Any employers you apply to for work (at the time of application).*
- d) Any establishment you apply to (at the time of application), or with which you are already enrolled, for a course of study.*

- e) *Any current or prospective patients or clients you intend to see or care for on a private basis when you are working in a self-employed capacity*
9. *You must tell your case officer, within seven days of your becoming aware of:*
- a) *Any clinical incident you are involved in.*
b) *Any investigation started against you.*
c) *Any disciplinary proceedings taken against you.*
10. *You must allow your case officer to share, as necessary, details about your performance, your compliance with and / or progress under these conditions with:*
- a) *Any current or future employer.*
b) *Any educational establishment.*
c) *Any other person(s) involved in your retraining and/or supervision required by these conditions*

The period of this order is for 12 months.

Before the order expires, a panel will hold a review hearing to see how well you have complied with the order. At the review hearing the panel may revoke the order or any condition of it, it may confirm the order or vary any condition of it, or it may replace the order for another order.

Any future panel reviewing this case would be assisted by:

- *Your attendance at the hearing;*
- *Any up to date testimonials; and*
- *An up to date reflective statement.'*

Decision and reasons on current impairment

The panel has considered carefully whether your fitness to practise remains impaired. Whilst there is no statutory definition of fitness to practise, the NMC has defined fitness to practise as a registrant's ability to practise safely and effectively without restriction. In considering this case, the panel has carried out a comprehensive review of the order in light of the current circumstances. Whilst it has noted the decision of the last panel, this panel has exercised its own judgement as to current impairment.

The panel has had regard to all of the documentation before it, including the NMC bundle and the RCN's written representations dated 10 February 2026. It has taken account of the submissions made by Mr Choudhury on behalf of the NMC.

Mr Choudhury referred the panel to the case of *Abrahaem v General Medical Council* [2008] EWHC 183 (Admin) and submitted that the persuasive burden is on Mrs Unufe-Eguakhide to demonstrate that she is no longer impaired through insight, reflecting and taking steps to strengthen her practice. Mr Choudhury told the panel that Mrs Unufe-Eguakhide has been engaging with the proceedings in so far as she is represented by the RCN, and that the RCN has provided the panel with positive submissions to take into account today. However, Mrs Unufe-Eguakhide has not provided evidence of any developing insight, any up to date testimonials, or an up to date reflective statement nor any evidence of the steps she has taken to strengthen her practice and to address the concerns.

Mr Choudhury informed the panel that Mrs Unufe-Eguakhide has not been practising as a registered nurse since the imposition of the conditions of practise order. He said that it is clear from the RCN's written representation that she is not able to practise or comply with the conditions due [PRIVATE]. However, that this does not stop her from taking steps to keep up with her nursing practice.

In the absence of any evidence of safe practice Mr Choudhury submitted that there remains a risk of repetition if an order was not in place. He, therefore, invited the panel to find that an order is necessary on the ground of public protection.

Mr Choudhury also submitted that the substantive order is also required in the wider public interest.

Mr Choudhury invited the panel to extend the current conditions of practice order to allow Mrs Unufe-Eguakhide to comply with the conditions of practice as and when [PRIVATE].

The panel also had regard to the RCN's written representations made on behalf of Mrs Unufe-Eguakhide, dated 10 February 2026:

[PRIVATE], Mrs Unufe-Eguakhide has therefore been prevented from working as a nurse since that time.

[PRIVATE].

[PRIVATE].

We invite the Panel to continue the COP unchanged [PRIVATE]. In either circumstance, she will then be able to secure work as a nurse, fully comply with the COP and demonstrate at a future review hearing that she is fit to practise as a nurse unrestricted.

If the Panel is not minded to agree with our submission then we respectfully request the Panel adjourns this review to the earliest available date to allow Mrs Unufe-Eguakhide to attend and be represented.'

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

In reaching its decision, the panel was mindful of the need to protect the public, maintain public confidence in the profession and to declare and uphold proper standards of conduct and performance.

The panel considered whether Mrs Unufe-Eguakhide's fitness to practise remains impaired.

The panel had regard to the NMC's guidance on 'Standard reviews of substantive orders before they expire' (Reference: REV-2a, Last Updated 30/08/2024). [PRIVATE]

The panel noted that Mrs Unufe-Eguakhide has been engaging with the NMC proceedings through her representative. However, it was of the view that there has not been any material change since the substantive hearing. [PRIVATE] on 20 June 2022 which has been prevented from working as a nurse since that time, it reminded itself that its overarching principle is to protect the public and the wider public interest, independently of [PRIVATE].

Whilst Mrs Unufe-Eguakhide stated that she is not able to practise a registered nurse and comply with her conditions because of [PRIVATE], the panel was of the view that she could have provided evidence of developing insight, further reflective statement and any steps she has taken to strengthen her practice, such as undertaking courses, to address the concerns and mitigate the risks identified.

In light of this, this panel determined that Mrs Unufe-Eguakhide remains liable to repeat matters of the kind found proved. The panel therefore decided that a finding of continuing impairment is necessary on the grounds of public protection.

The panel has borne in mind that its primary function is to protect patients and the wider public interest which includes maintaining confidence in the nursing profession and upholding proper standards of conduct and performance. The facts found proved related to a senior nurse who was a leader of different teams and had been found to be in a position of misconduct and a risk of harm to patients. The panel has been provided with no evidence that these matters have been addressed by Mrs Unufe-Eguakhide. There, therefore, remains a real risk that these behaviours could be repeated reducing public confidence in the profession and a failure to uphold professional standards. The panel determined that, in this case, a finding of continuing impairment on public interest grounds is also required.

For these reasons, the panel finds that Mrs Unufe-Eguakhide's fitness to practise remains impaired.

Decision and reasons on sanction

Having found Mrs Unufe-Eguakhide's fitness to practise currently impaired, the panel then considered what, if any, sanction it should impose in this case. The panel noted that its powers are set out in Article 30 of the Order. The panel has also taken into account the 'NMC's Sanctions Guidance' (SG) and has borne in mind that the purpose of a sanction is not to be punitive, though any sanction imposed may have a punitive effect.

The panel first considered whether to take no action but concluded that this 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 take no further action.

It then considered the imposition of a caution order but again determined that, due to the seriousness of the case, and the public protection issues identified, an order that does not restrict Mrs Unufe-Eguakhide's practice would not be appropriate in the circumstances. The SG states that a caution order may be appropriate where *'the case is at the lower end of the spectrum of impaired fitness to practise, but the Committee wants to mark that what happened was unacceptable and must not happen again.'* The panel considered that Mrs Unufe-Eguakhide's misconduct was not at the lower end of the spectrum and that a caution order would be inappropriate in view of the issues identified. The panel decided that it would be neither proportionate nor in the public interest to impose a caution order.

The panel next considered whether imposing a further conditions of practice order on Mrs Unufe-Eguakhide's registration would still be a sufficient and appropriate response. The panel is mindful that any conditions imposed must be proportionate, measurable and workable.

The panel determined that it would be possible to formulate appropriate and practical conditions which would address the failings highlighted in this case. The panel accepted that Mrs Unufe-Eguakhide has been unable to comply with conditions of practice due to [PRIVATE] but noted that she is engaging with the NMC and is willing to comply with the conditions.

[PRIVATE], the panel determined that the current conditions of practice order is sufficient to protect patients and the wider public interest, as well as allow her the opportunity to comply with the conditions and to demonstrate safe practice. In this case, it is considered

there are workable conditions which would protect patients during the period they are in force.

The panel was of the view that to impose a suspension order or a striking-off order would be disproportionate at this stage and would not be a reasonable response in the circumstances of Mrs Unufe-Eguakhide's case.

Accordingly, the panel determined, pursuant to Article 30(1)(c) to make a conditions of practice order for a period of 12 months, which will come into effect on the expiry of the current order, namely at the end of 27 March 2026. It decided to impose the following conditions which it considered are appropriate and proportionate in this case:

For the purposes of these conditions, 'employment' and 'work' mean any paid or unpaid post in a nursing, midwifery or nursing associate role. Also, 'course of study' and 'course' mean any course of educational study connected to nursing, midwifery or nursing associates.

1. You must not be the nurse in charge on any shift.
2. You must be indirectly supervised, working at all times on the same shift as, but not always directly observed by another registered nurse.
3. You must meet with your line manager, mentor and/or supervisor on a monthly basis to discuss the following areas of your practice:
 - a. Working with vulnerable patients
 - b. Working within a multidisciplinary team
4. You must work with your line manager, mentor and/or supervisor to create a personal development plan (PDP). Your PDP must address the concerns about:
 - a. Working with vulnerable patients
 - b. Working within a multidisciplinary team

5. You must send a copy of your PDP to the NMC before any review hearing.

6. You must keep us informed about anywhere you are working by:
 - a. Telling your case officer within seven days of accepting or leaving any employment.
 - b. Giving your case officer your employer's contact details.

7. You must keep us informed about anywhere you are studying by:
 - a. Telling your case officer within seven days of accepting any course of study.
 - b. Giving your case officer the name and contact details of the organisation offering that course of study.

8. You must immediately give a copy of these conditions to:
 - a. Any organisation or person you work for.
 - b. Any agency you apply to or are registered with for work.
 - c. Any employers you apply to for work (at the time of application).
 - d. Any establishment you apply to (at the time of application), or with which you are already enrolled, for a course of study.
 - e. Any current or prospective patients or clients you intend to see or care for on a private basis when you are working in a self-employed capacity

9. You must tell your case officer, within seven days of your becoming aware of:
 - a. Any clinical incident you are involved in.

- b. Any investigation started against you.
- c. Any disciplinary proceedings taken against you.

10. You must allow your case officer to share, as necessary, details about your performance, your compliance with and / or progress under these conditions with:

- a. Any current or future employer.
- b. Any educational establishment.
- c. Any other person(s) involved in your retraining and/or supervision required by these conditions

The period of this order is for 12 months.

This conditions of practice order will take effect upon the expiry of the current conditions of practice order, namely the end of 27 March 2026 in accordance with Article 30(1).

Before the end of the period of the order, a panel will hold a review hearing to see how well Mrs Unufe-Eguakhide has complied with the order. At the review hearing the panel may revoke the order or any condition of it, it may confirm the order or vary any condition of it, or it may replace the order for another order.

Any future panel reviewing this case would be assisted by:

- Your attendance at the next review hearing;
- Any up to date testimonials;
- An up to date reflective statement; and
- [PRIVATE].

This will be confirmed to Mrs Unufe-Eguakhide in writing.

That concludes this determination.