

First-tier Tribunal Care Standards

The Tribunal Procedure (First-tier Tribunal) (Health, Education and Social Care) Rules 2008

NCN: [2025] UKFTT 00431 (HESC)
2024-01239.EY

Heard at Birmingham Civil Justice Centre
On 1, 2 and 7 April 2025

BEFORE:
Tribunal Judge Siobhan Goodrich
Specialist Member Ms L Bromley
Specialist Member Ms M Harris

Between:

Joanne Tracey & Libra Children Services Ltd

Appellants

v

Ofsted

Respondent

DECISION AND REASONS

Representation

For the Respondent: Mr Neil Smart, Ward Hadaway, instructed by Ofsted Legal Services

The Appellant: Ms Tracey in person, supported by Mr Richard Williams

The Appeal

1. The First and Second Appellants appeal against the decisions made by the Respondent under section 13 of the Care Standards Act 2000 on 2 September 2024 to refuse the application for registration as the provider and manager of a children's home, Elmdene House. The right of appeal lies under section 21 of the Care Standards Act 2000.
2. The evidence regarding both the decisions under appeal is inextricably interlinked and the appeals were therefore consolidated on 15 November 2024 at the request of the parties.

The Parties

3. The Appellant has worked in a variety of roles in the care sector for over some 30 years. Often her work has been on an agency basis and, on occasions, via direct employment. She was appointed as a Responsible Individual (RI) and was considered suitable to be the RI for Coven Homes by the Respondent in August 2023. She resigned from that position on 12 October 2023.
4. She and her partner, Mr Williams, are co-directors of Libra Children's Services Ltd. The applications made on 19 February 2024 relate to the provision of a children's home at Elmdene House ("the Home") at 1072 Chester Road, Erdington, Birmingham. The registration sought is for up to three children with emotional and/or behavioural difficulties (EBD). It is intended that Mr Williams will work off site and be responsible for overall organisation matters, such as pay roll.
5. The Respondent is the Office for Standards in Education, Children's Services and Skills (Ofsted) and is the statutory authority responsible for the registration and regulation of children's homes under the Care Standards Act 2000, and the regulations made thereunder, which include the Children's Homes (England) Regulations 2015.

The Hearing

6. We had received an indexed and paginated bundle (630 pages pdf). This included the witness statements, exhibits and other documents which the parties provided pursuant to case management directions regarding the exchange of evidence. In preparation the panel read the bundle as a whole, and with particular regard to essential reading list. We had also received and read the parties' skeleton arguments.
7. During the oral evidence of Ms Tracey it emerged that, pursuant to the direction of Judge Khan on 13 March 2024, she had provided a witness statement and documents in response to the third statement of Mrs Cardozo-Evans dated 4 March 2025. Contrary to the directions order made by Judge Khan the Respondent had not ensured that this late evidence was included in the hearing bundle and had not bought hard copies of these documents to the hearing. The further bundle was, however, then provided to the panel both electronically and copies were provided by the court clerk, which we marked as Exhibits M 1-9. Ms Tracey adopted her undated statement during her evidence and spoke to the further documents which included the witness statements from Ms Liz Jones and Ms Kehinde Olaniyan in support of the appeal.

Restricted Reporting Order

8. The Tribunal made a restricted reporting order under Rule 14(1) (a) and (b) of the 2008 Rules, prohibiting the disclosure or publication of any documents or matters

likely to lead members of the public to identify the children to whom reference might be made so as to protect their interests. We will anonymise the names of children by using initials as necessary.

The Chronology regarding the decision under appeal

9. The main dates are as follows:

19 February 2024: the First Appellant applied with Ofsted to register Elmdene House and to be the registered manager (RM) for the home. Ms Yvette Powell applied to be the responsible individual.

22 and 23 April 2024: Ofsted contacted the Appellant to mutually agree a date for the registration visit and to request information prior to the visit. The Appellant provided the requested information and a date for the registration visit was agreed for 5 June 2024.

5 June 2024: Mrs Cardozo-Evans conducted the registration visit to the Home. She considered that a number of the regulation requirements were not met.

6 - 12 June 2024: The Appellant liaised with Ofsted via email providing further information following the visit including a screen shot of her account balance of £20,424.19. During further email exchanges with the Appellant, (12 June) Ofsted informed her that no email had been received from her accountant.

21 June 2024: Ofsted served Notice of Proposals (NoPs) to refuse the Appellant's applications to register Elmdene House and the application to register as manager. These set out in detail the matters of concern at that time.

16 July 2024: The Appellant submitted written representations to the proposals by Ofsted.

7 August 2024: Ofsted emailed Ms Tracey requesting further information following her written representations.

13 August 2024: The Appellant made representations in person via Teams. On 15 August 2024 Ofsted emailed the Appellant to inform her that Ofsted had considered the representations and a decision was made to carry out a second visit to Elmdene House on 22 August 2024.

22 August 2024: Mrs Cardozo-Evans undertook a further visit to Elmdene House. Mr Wilton was also present. A second fit person interview (FPI) took place in respect of both Ms Tracey and Ms Powell separately. Mrs Cardozo-Evans considered that whilst some improvements had been observed at the second visit, such as the living conditions within the home and some improvements to Ms Tracey's knowledge of the regulations re safeguarding, several requirements under the regulations remained unmet. Mr Wilton had reviewed safe recruitment and found that the requirements of regulation 32 and Schedule 2 had not been met in a number of respects.

23 August 2024: Ms Powell withdrew her application to be the responsible individual.

2 September 2024: The Respondent issued Notice of Decisions (NoDs) to refuse Ms Tracey's applications to register the Home and to register her as the manager.

6 September 2024; Ofsted received an application from Libra Children Services for a new responsible individual.

16 September 2024: the appeals were lodged.

On 14 January 2025, and again on 21 January 2025, Ofsted contacted the new proposed responsible individual (Ms Eacott). No response was received.

On 10 February 2025: Ms Tracey sent an email to Ofsted Legal Services stating that they have a young person on a DoLs order who had been placed in the setting since November 2024. Ms Tracey's email asserted that Ofsted were already aware of this.

21 February 2025: Ofsted sent a warning letter to Libra Children Services Ltd stating that on 11 February 2024 Ofsted was informed by Birmingham Children's Trust (BCT) of the placement of the child on a DoLs order referred to above. The letter included the warning that "You must cease operating. It is an offence to operate a children's home setting until it is registered, including if an application is in progress."

26 February 2025: the Appellant's application for Ofsted to register a new Responsible Individual (Ms Benson) was "accepted" by Ofsted.

The Decisions under Appeal

10. We will not set out all of the detail of the NoDs. The application to register Libra Childcare Services as the provider at Elmdene house was refused as the Appellant did not meet regulation 28 (Fitness of manager), regulation 26 (Fitness of registered provider), regulation 32 (Fitness of worker), and regulation 13, (the leadership and management standard.) There were also concerns about Ms Tracey's integrity.
11. The application to register Ms Tracey as manager was refused because it was considered that she did not meet all the requirements of regulation 28 (Fitness of manager). The Respondent had concerns about Ms Tracey's integrity. The Respondent's case is that it is not satisfied that Ms Tracey has shown that the regulations will be met and/or continue to be complied with.
12. It was accepted in the NoD that Ms Tracey had worked for 31 months in a role relevant to the residential care of children and had therefore complied with regulation 28 (2) (a). Some of the matters on which reliance was placed included that, in her manager application, Ms Tracey:

- a) had failed to demonstrate the necessary skills and experience.
- b) had not ensured that staff were safely recruited.
- c) failed to provide a full employment history in the application which had resulted in some references not being obtained.
- d) there were concerns about the credibility of the employment history.
- e) there were also concerns about Ms Tracey's assessment or evaluation of location risks (the LRA).
- f) The Children's Guide included material that was inappropriate, punitive and inconsistent with the therapeutic approach outlined in the Statement of Purpose. Despite discussions regarding the appropriateness of inclusion that bedtime for children of seven years old would be at midnight at weekends, this has remained unaltered. This did not reflect an understanding of age-appropriate boundaries for children.
- g) In the June visit there was a significant gap in knowledge of the roles and responsibility of the RM of a children's home. During the second visit (August 2024) Ms Tracey shared the detail of the monitoring and review of systems implemented to ensure oversight of the Home. However, Ms Tracey said that she would rely on staff to tell her if incidents had been managed appropriately.

The Appeals

13. In the reasons for appeal (section H) Ms Tracey contended, amongst other matters, that:

- i. The initial visit was clearly flawed which is why it had to be repeated.
- ii. Issues regarding the RI have been addressed because a new Responsible Individual is employed 3 days a week and her application has been accepted by Ofsted.
- iii. Several of the issues were addressed in the written representation on the 16.07.2024 but seem to have been overlooked or repeated. The children's guide and location risk assessment had been updated.
- iv. In August 2023 she had satisfied Ofsted's FPI for the Responsible Individual role at another children's home (Coven Care). The Responsible Individual role sits alongside the Registered Manager role as well as supervising the Registered Manager, so she had shown experience and skill at that level. She was also designated safeguarding lead for that home.
- v. She sent an email to the inspector on the 10 June 2024 with the referenced details for "Care for me housing" but the Respondent has said this was not received. She was asked to resend it along with staff details at the visit on the 22 August 2024 but she received a call at 9.09am the following working day to say her application had been refused so she wasn't given time to send any details.
- vi. Coven Homes was always happy with her work until she felt she had to raise the regulation 40 notification to safeguard a young person and a member of staff. Following this she was removed from all communications the next day. There are references available so there is no proof that she does not satisfy Regulation 28.
- vii. She does not believe that a reference that is not related to any safeguarding matters should be a reason to refuse her registration.

The Response

14. Essentially the Respondent maintained its decisions. As made clear in the skeleton and in the third statement of Mrs Cardozo-Evans dated 4 March 2025, and the consequential amendment to the Scott Schedule, the original concerns regarding integrity have since been amplified by the fact that Ofsted has since learned that Ms Tracey had accepted the placement of a child in November 2024 at the request of the local authority - Birmingham Children's Trust.

The Legal Framework

15. The provisions of the Childcare Act 2000 include the following:

“11 Requirement to register.

(1) Any person who carries on or manages an establishment or agency of any description without being registered under this Part in respect of it (as an establishment or, as the case may be, agency of that description) shall be guilty of an offence...”

“13. Grant or refusal of registration.

(1) Subsections (2) to (4) apply where an application under section 12 has been made with respect to an establishment or agency in accordance with the provisions of this Part.

(2) If the registration authority is satisfied that—

(a) the requirements of regulations under section 22; and

(b) the requirements of any other enactment which appears to the registration authority to be relevant,

are being and will continue to be complied with (so far as applicable) in relation to the establishment or agency, it shall grant the application; otherwise it shall refuse it.

(3) The application may be granted either unconditionally or subject to such conditions as the registration authority thinks fit.

(4) On granting the application, the registration authority shall issue a certificate of registration to the applicant.

(5) The registration authority may at any time—

(a) vary or remove any condition for the time being in force in relation to a person's registration; or

(b) impose an additional condition.”

The Children's Homes (England) Regulations 2015

16. The 2015 Regulations made under section 22 of the Act provide as follows:

“Fitness of manager

28.—(1) A person may **only manage a children's home if—**

- (a) the person is of **integrity and good character**;
- (b) **having regard to the size of the home, its statement of purpose, and the number and needs (including any needs arising from any disability) of the children—**
 - (i) the person has **the appropriate experience, qualification and skills** to manage the home effectively and lead the care of children; and
 - (ii) the person is physically and mentally fit to manage the home; and
- (c) **full and satisfactory information is available in relation to the person in respect of each of the matters in Schedule 2.**

(2) For the purposes of paragraph (1)(b)(i), a person **has the appropriate experience and qualification** if the person has—

- (a) **within the last 5 years, worked for at least 2 years in a position relevant to the residential care of children;**
- (b) **worked for at least one year in a role requiring the supervision and management of staff working in a care role; and**
- (c) by the relevant date, attained—
 - (i) the Level 5 Diploma in Leadership and Management for Residential Childcare (England) (“the Level 5 Diploma”); or
 - (ii) a qualification which the registered provider considers to be equivalent to the Level 5 Diploma.”

(Subsections (3) and (4) then go on to define “the relevant date”).

(our **bold**)

Fitness of workers

32.—(1) The registered person must recruit staff using recruitment procedures that are designed to ensure children's safety.

(2) The registered person may only—

- (a) employ an individual to work at the children's home; or
- (b) if an individual is employed by a person other than the registered person to work at the home in a position in which the individual may have regular contact with children, allow that individual to work at the home,

if the individual satisfies the requirements in paragraph (3).

(3) The requirements are that—

- (a) the individual is of integrity and good character;
- (b) the individual has the appropriate experience, qualification and skills for the work that the individual is to perform;
- (c) the individual is mentally and physically fit for the purposes of the work that the individual is to perform; and
- (d) full and satisfactory information is available in relation to the individual in respect of each of the matters in Schedule 2.

(4) For the purposes of paragraph (3)(b), an individual who works in the home in a care role has the appropriate qualification if, by the relevant date, the individual has attained—

- (a) the Level 3 Diploma for Residential Childcare (England) (“the Level 3 Diploma”); or
- (b) a qualification which the registered person considers to be equivalent to the Level 3 Diploma....

(Subsections (5) and (6) then go on to define the relevant date)

(7) The registered person may permit an individual to start work at the home despite the fact that the requirement in paragraph (3)(d) has not been met if—

- (a) the registered person has taken all reasonable steps to obtain full information about each of the matters in Schedule 2 in respect of the individual, but the enquiries in relation to any of the matters in paragraphs 3 to 6 of Schedule 2 are incomplete;
- (b) full and satisfactory information in respect of the individual has been obtained in relation to the matters in paragraphs 1 and 2 of Schedule 2;
- (c) the registered person considers that the circumstances are exceptional; and
- (d) the registered person ensures that the individual is appropriately supervised while carrying out the individual's duties, pending receipt of any outstanding information on the matters in paragraphs 3 to 6 of Schedule 2, which is then considered satisfactory by the registered person.

(8) The registered person must take reasonable steps to ensure that any individual who is working at the home and who does not fall within paragraph (2)(a) and (b) is appropriately supervised while carrying out the individual's duties.

SCHEDULE 2 of the Regulations sets out the Information required in respect of persons seeking to carry on, manage or work at a children's home with reference to Regulations 26, 28, and 32.

1. Proof of identity including a recent photograph.

2. Either—

(a) where the position falls within regulation 5A of the Police Act 1997 (Criminal Records) Regulations 2002, an enhanced criminal record certificate issued under section 113B of the Police Act 1997 which includes, where applicable, suitability information relating to—

- (i) children (within the meaning of section 113BA(2) of the Police Act 1997);
- (ii) vulnerable adults (within the meaning of section 113BB(2) of the Police Act 1997; or

(b) in any other case, a criminal record certificate issued under section 113A of the Police Act 1997.

3. Two written references, including a reference from the person's most recent employer, if any.

4. If a person has previously worked in a position involving work with children or vulnerable adults, verification so far as reasonably practicable of the reason why the employment or position ended.

5. Documentary evidence of any qualifications which the person considers relevant for the position.

6. A full employment history, together with a satisfactory explanation of any gaps in employment, in writing.

17. The Regulations, enacted under section 23 of the Care Standards Act 2000, set out the Quality Standards that “must be met” in homes – see regulation 4. The quality standard on which the Respondent relies is the leadership and management standard under regulation 13. We have considered this and also the Respondent’s *“Guide to Children’s Homes Regulations including the quality standards”* published in April 2015. We set out below relevant parts of the standard under regulation 13.

“The leadership and management standard

13.—(1) The leadership and management standard is that the registered person enables, inspires and leads a culture in relation to the children's home that—

- (a) helps children aspire to fulfil their potential; and
- (b) promotes their welfare.

(2) In particular, the standard in paragraph (1) requires the registered person to—

- (a) lead and manage the home in a way that is consistent with the approach and ethos, and delivers the outcomes, set out in the home's statement of purpose;
- (b) ensure that staff work as a team where appropriate;
- (c) ensure that staff have the experience, qualifications and skills to meet the needs of each child;
- (d) ensure that the home has sufficient staff to provide care for each child;
- (e) ensure that the home's workforce provides continuity of care to each child;....”

18. We have considered, but need not set out, the other requirements of 2015 regulations on which the Respondent relies regarding:

- 26 (Fitness of registered provider),
- 46 (Review of premises).

The Hearing

19. At the outset of the hearing the judge outlined the burden and standard of proof in a registration appeal and the Tribunal's powers and function, which had also been explained in the response to the appeal, in the case summary, and also in the Respondent's skeleton argument. Both parties confirmed that they understood these. The judge also asked if any reasonable adjustments needed to be made but neither party requested these. The judge explained that regular breaks would be taken but if the Appellant required a break she need only ask, and also that she could ask for clarification of anything she did not understand. Amongst other matters, it was also explained to Ms Tracey that when the time came for her to give evidence the judge would assist her in introducing her evidence and by asking questions in chief if she wished

Witnesses

20. With the agreement of the parties, we received witness statements to be treated as read from Mr Wilton, Social Care Regulatory Inspector and Ms Higham, Senior his Majesty's Inspector, for the Respondent. Similarly, we received statements from Ms Jones, former RI at Glenavon House, and Ms Olaniyan, a former support worker at Glenavon House, for the Appellant. The judge explained that although neither party sought to cross examine these witnesses their statements were not agreed evidence as such. The statements of witnesses whose evidence is treated as read falls to be assessed in the round along with all the other evidence, and in the context that their evidence has not been tested.

21. We heard oral evidence as follows:

For the Respondent:

Mrs Nateisha Cardozo Evans, Social Care Regulatory Inspector

For the Appellant:

Ms Tracey

The Oral Evidence

22. The statements of witnesses who gave live evidence are a matter of record and we directed that these stand as the main evidence in chief. However, given that the Appellant represented herself we asked the Respondent to make sure that the key elements of Mrs Cardozo-Evans' evidence regarding the visits/interviews and her concerns were covered in chief. When Ms Tracey gave evidence the judge assisted her in the adoption of her statements, and asked questions regarding the main other aspects of her case in chief. We will not set out all the oral evidence given but will refer to parts as necessary when giving our reasons.

The Burden and Standard of Proof

23. In an appeal against the refusal of registration it is for the Appellant to satisfy us that she meets and will continue to meet all the requirements of the regulations. The standard of proof is the balance of probabilities - see ***Jones v Commission for Social Care Inspection [2004] EWCA Civ 1713***.

Our Consideration of the evidence

24. It is common ground that, standing in the shoes of the Regulator, we are required to determine the matters before us afresh and to make our own decision on the evidence as at today's date.
25. In practical terms the outcome/resolution of the provider application is dependent on the merits of the manager appeal. This is not simply because regulation 26 (5) (a) mirrors the requirement that the provider "is of integrity and good character". It arises also because regulation 27 requires that the registered provider must appoint a person to manage the children's home. In turn, a registered manager "may only manage a children's home" if she meets all the requirements of regulation 28. Our focus is therefore on the appeal against the refusal to register Ms Tracey as manager.
26. Subject to fairness, we can consider any new information or material that was not available at the date of decision which is relevant in our "de novo" decision-making. It is, for example, open to any appellant in any given case to rely on evidence to show that the facts and circumstances were not as alleged and/or to contend that opinions or views reached were wrong and/or mistaken and/or unjustified/unreasonable and/or that the issues have since been addressed and/or that her attitude/insight has developed. In other words, it is open to any appellant to show that she meets the requirements of the regulations today and will continue to do so. Subject to fairness, it is open to either party to rely on circumstances that have arisen since the NoDs.
27. The redetermination in this appeal includes consideration of the evidence provided by both sides in this appeal as well as the oral evidence which has now been tested in cross-examination. We have considered all the evidence and submissions before us with care. We make findings regarding the issues that we consider to be of most importance. If we do not refer to any particular aspect of the evidence it should not be assumed that we have not taken all of the evidence or submissions into account.
28. In essence, the Appellant's case in closing is that she accepts that she may not have fully articulated her strengths during interview. However, her Fit Person documentation, qualifications, and the evidence submitted all show that she possesses the experience, skills, and leadership required to manage a solo placement children's home competently and safely.
29. In contrast, the Respondent's case remains that the evidence, now tested, should lead to dismissal of the appeals.
30. Amongst other matters, the Appellant contends that it was unfair or inappropriate for the Respondent to conduct a second visit and/or interviews. She suggests that the second visit was undertaken because the first interview was flawed in some way. We disagree. Having considered the record of the interview in June 2014 we consider that this was conducted in a fair and transparent manner. The Appellant was given ample opportunity to answer questions and was given prompts when it was apparent that she was in difficulty. She was also requested to provide further documents. She made lengthy written representations and also attended a Teams meeting. In our view some aspects of her representations did need further

consideration, including her assertion that she had now remedied the deficiencies that had been identified at the first interview in June 2024 regarding safe recruitment. In this and other respects, some of the documents requested had still not been provided (and some have still not been provided to date). We accept Mrs Cardozo-Evans's evidence that the second visit in August 2024 was arranged so that the Respondent could interview Ms Tracey and Ms Powell in the light of the further representations that had been made. In the event this led to more favourable views being reached in some respects. For example, we accept Mrs Cardozo-Evans' evidence that it was the production of the HMRC documents at that meeting that showed that Ms Tracey's work at Coachild that resulted in a change of view regarding the length of the Appellant's experience under 28 (2) (a). More favourable views were also reached regarding the physical premises. Ms Tracey was also able to demonstrate better knowledge of the regulations and in relation to aspects of safeguarding. In our view the decision to conduct a second visit/interview was both sensible and fair. We have also considered the interview record regarding the second visit in August 2024. In our view the interview was fairly conducted.

31. We noted that Ms Tracey's Level 5 qualification in Residential Care was in "Adult Services". She explained that she had been able to access funding for this specific course but that the modules she undertook mainly related to children's care. There was no challenge to her evidence that in her application she had uploaded the list of modules undertaken. Although mentioned by Mrs Cardozo- Evans in her second witness statement, there was no significant issue raised by the Respondent in interview, or in the NoDs, as to whether Ms Tracey met the requirements of regulation 28 (2) (c), either by reference to consideration of these modules or any assessment of equivalence. For the avoidance of any doubt we find that regulation 28 (2) (c) was always satisfied.
32. The Respondent accepted in the Scott Schedule and in its closing submissions that, for the purposes of Regulation 1(b)(i), the Appellant has satisfied regulation 28(2)(a) and 28 (2)(b), with reference to "appropriate experience" and "qualifications". in our view the effect of regulations 28 is that the Respondent's acceptance that the requirement of 28 (2) (a) and (b) satisfied is dispositive as to the issue of "experience" and "qualifications" under 28 (1) (a). However, this is not the case regarding the issue of skills.
33. We considered the evidence regarding Ms Tracey's employment/work history which includes:
 - 1) The Appellant was employed by Care for Me as a senior support worker from about July/August 2018 until in or about August 2020. This was supported accommodation provision for looked after children aged between 17 and 18. The Appellant's evidence was that she had worked on a shift pattern between 10 am and 10 pm and 12 pm to 12 am for three or four days a week. She produced a rota for July 2018 which showed that she completed about 185 hours that month which equates to a full-time post of 40 or more hours a week. Ms Tracey confirmed that her hours were about 170 per month on average.
 - 2) Whilst employed by Care for Me she also worked for two other businesses. She told us that her contract hours at Raw Granite Ltd (3 November 2018

to 13 March 2020) as an auditor were from 9 am to 4 pm four days a week, and her work only required two site visits each week. She was able to complete her audit work as and when she chose. In the application she stated that she left Raw Granite because the business was laying off people due to the pandemic and she was on the point of setting up her 16+ service, Coached Child Care Ltd, (also referred to as “Coachchild”).

- 3) The Appellant was also employed full time as a service manager working between 9am and 5 pm at Sil Services between October 2019 to July/August 2020. In the FPI Ms Tracey described this as accommodation for children 16 +.
 - 4) Ms Tracey owned and managed her own 16+ supported accommodation - Coached Childcare Ltd (Coachchild) - between July 2020 and April 2021.
 - 5) The Appellant worked at Service Care solutions as a care coordinator between January 2022 and April 2022. This was an agency assignment and she ceased work due to a serious car accident.
 - 6) The Appellant was engaged as the Responsible Individual at Coven Care Home between 30 June 2023 and 12 October 2023.
 - 7) The Appellant worked for Next Step Residential Care (Glenavon Children’s Home) as interim manager for a very short period between 20 November 2023 and 15 December 2023.
34. On the face of it is difficult to understand how Ms Tracey managed to fulfil the duties of the three roles referred to at paragraph 33 1) -3) above. Ms Tracey’s case is that she provided referee details regarding Care for Me to the Ofsted by email but Ofsted’s position is that these were not received. We accept the evidence of Mrs Cardozo-Evans that she again requested referee details for Care for Me during the visit on 22 August 2024 but to date the referee details have not been provided. We noted also that Ms Tracey had not referred to Care for Me in her application at all. Ms Tracey told Mrs Cardozo-Evans that she had forgotten about it. In our view this would be strange given that it was one of her longer employments and was highly relevant to the application. In her oral evidence Ms Tracey said she did not mention Care for Me in the application because “the on-line set up did not lend itself to overlap and I put in the most recent ones.” In our view this does not make much sense because the posts she included went back to early 2000. We noted that she had also not included Sil Services which was an overlapping employment. In our view, at the very least, Ms Tracey’s account suggests that she has poor organisational skills.
35. Another aspect of Ms Tracey’s work history is that she provided supported living services for children aged 16+ on her own account at 1072 Chester Road between July 2020 and April 2021 (Coached Child Care Ltd or “CoaChild”). The details of the extent of this were discussed in interview. One child had lived in the service for 6-8 weeks and then returned home to family. The other child was accommodated between November 2019 and March 2020 and for most of this time was staying with his girlfriend. The Appellant explained that she would meet this child twice each week to hand over pocket money.

Skills

36. As to skills we refer to our findings above. The issue of skills has to be considered:
“(b) having regard to the size of the home, its statement of purpose, and the number and needs (including any needs arising from any disability) of the children—”
37. Whilst the Respondent accepts that Ms Tracey has satisfied the time requirements regarding qualifications and the length of experience under regulation 28 (2) (a) and (b) the burden is on her to show that she has the skills to be a manager of a children’s home.
38. We recognise that Ms Tracey has demonstrated some skills in managing young adults living in supported accommodation. We took into account the character reference of Mr Merrick who worked for the Sandwell Children’s Trust and with two children who lived in the setting provided by Sil Services when Ms Tracey worked there. He speaks in very favourable terms of his experience of her work and her ability to care for young adults in supported accommodation.
39. In our view, there are differences between the skills involved in leading and managing supported accommodation and those needed to lead and manage a children’s home. Supported accommodation typically (but not invariably) involves the care of young people of 16 years plus who are moving towards independence. The needs of children with emotional and behavioural difficulties who are placed in a children’s home are likely to be much more acute, and more demanding/challenging. They may frequently involve complex difficulties such as fractured or non-existent family relationships, past abuse, criminal and sexual exploitation, county lines, self-harm and/or significant emotional and behaviour difficulties often due to significant adverse life and family circumstances. In our view the extent to which Ms Tracey is able to demonstrate skills regarding her ability to respond to the needs of children with EBD in homes has been inevitably limited because her recent employment as a manager in such homes has been of short duration. That said, in our view the Appellant has had ample opportunity to demonstrate her skills in the setting of a children’s home within the interview and representations process, and also during the appeal process.
40. Ms Tracey contends that the Respondent did not take proper account of all the material she provided in her Fit Person questionnaire (the FPQ or questionnaire). We had noted this was a matter of concern to Ms Tracey and we asked for, and the Respondent provided, the questionnaire which we then added to the bundle. We have considered the information Ms Tracey provided in her responses in the FPQ. In our view the point and purpose of the FPQ was to provide a backdrop for exploration at interview as necessary. We consider that in the main Ms Tracey’s responses in the FPQ recited what she will do: i.e. were aspirational /theoretical rather than evidence based. She did not provide many examples to illustrate her skills, and this was largely the case even when she had been expressly asked to provide an example – see, for example, Q 11 (the positive relationships standard) in which she was asked to provide an example from her own practice where she had improved staff knowledge and understanding of children’s emotional and behavioural needs. We recognise that Ms Tracey did provide an example regarding Q12 (the protection of children standard) in the context of a service run

by senior staff and a director, which concerned her reporting her concerns to the LADO.

41. We consider that the aspects that Mrs Cardozo-Evans explored in interview were on point regarding the key lines of enquiry she had formulated and were appropriate. We have studied both interviews as well as the evaluative comments made by Mrs Cardozo-Evans some of which were positive. We consider that Mrs Cardozo-Evans was fair-minded, balanced and conscientious in her approach in the interviews, and in her evidence.
42. Ms Tracey contends that the fact that she is responsible for establishing and managing an accredited training centre that delivers the Level 3 (and Level 5) Diploma in Residential Childcare “demonstrates not only that she meets the requirements under Regulation 28, but that she possesses the skills and sector-specific knowledge to effectively manage and develop a capable workforce.” We acknowledge that the Appellant is an accredited trainer. However, the possession of knowledge and/or the ability to train are different attributes to the skills involved in managing and leading a children’s home. The latter involves the assessment of the applicant’s skills regarding the application of the regulations in practice. In our view Ms Tracey did not demonstrate that she has the necessary skills to lead and manage a children’s home. This is illustrated below with regard to the issue of safe recruitment.

Safe recruitment and the Fitness of workers

43. It should go without saying that the regulations regarding safe recruitment of workers under regulation 32 are extremely important. The same requirements apply regarding regulations 26 (Fitness of provider) and 28 (Fitness of manager). In other words, there is a clear objective that anyone who works in a children’s home has been safely recruited. The children who live in children’s homes are usually very vulnerable and their needs are often very complex. The care and protection of children who may be placed in a home is dependent upon the fulfilment of proper recruitment practices to seek to ensure that children will be cared for by individuals whose background and character employment history, skills and experience have been carefully assessed. To do otherwise runs the risk of placing very vulnerable children at risk of harm. In our view regulation 32, the quality standard in regulation 13, and Schedule 2 of the Regulations provide clear and unambiguous requirements.
44. At her first visit in June 2024 Mrs Cardozo-Evans had significant concerns regarding the issue of safe recruitment by Ms Tracey. On review of the staff files during the first visit several shortfalls identified, such as references not received, and one staff member had no DBS. Amongst other matters, this included that there were no records of interview, discussion or evaluation regarding the applications made. Ms Tracey’s explanation was that she had worked with the applicants at Glenavon House but she had only worked there for less than a month. Further Ms Tracey had not noted in writing the reasons for any gaps in employment.

45. We noted that Ms Tracey's case is that: "There is not a requirement to contact previous employers unless I have concerns which I didn't have". We agree with Mrs Cardozo-Evans' view this demonstrates a lack of knowledge and understanding of the regulations and basic safeguarding in the context of recruitment and keeping children safe.
46. There was no significant challenge to the findings made by Mr Wilton when he reviewed the recruitment files at the second visit in August 2024. The point of the review was to see whether Ms Tracey had addressed the safe recruitment issues that had been explained in detail both at the June visit by Mrs Cardozo-Evans, and also in the NOPs. It is important to note that Ms Tracey had maintained in the written representations, and in the representation meetings, that safe recruitment issues had been addressed. Mr Wilton made detailed contemporaneous notes and we consider that these are reliable.
47. Mr Wilton examined four files. He found that none of the files met the required standard set out in the Children's Homes (England) Regulations 2015. For example, the Appellant did not ensure that a full employment history was obtained for staff to enable her to identify and explore gaps in employment. The Appellant was unable to provide a clear record of the reasons individuals had left their previous roles when working with children and vulnerable adults. Some references were not obtained, and there were no records to demonstrate that some references provided were verified. The Appellant shared that one staff member had a previous criminal conviction. However, the Appellant could not provide evidence of what the conviction was for, or what action had been taken to review this matter or consider the risk to children arising from the conviction. When discussing the shortfalls identified and reviewing the specific details of the regulation with the Appellant, Ms Tracey accepted that the files reviewed did not meet the regulations, but she said she will continue to work on them and asked for more time.
48. We noted Ms Tracey's evidence that she had offered that day to fetch from elsewhere the DBS certificate for the employee with previous convictions but there was insufficient time. On the evidence before us the convictions were for shoplifting on more than one occasion, and there was a conviction for assault. We recognise that Ms Tracey's case is that the convictions were some 40 years old, but in our experience it is not usual for convictions of that age to appear on an updated DBS. Mr Wilton said that Ms Tracey agreed to send in this DBS certificate to Mrs Cardozo-Evans but this was never provided. We noted that Ms Tracey has not taken the opportunity to provide this DBS in this appeal.
49. Mrs Cardozo-Evans told us that it stood out in her memory that that Mr Wilton had had to go through Schedule 2 with Ms Tracey in an effort to explain why, contrary to her original belief, recruitment had not been in accordance with the regulations.
50. We have also considered the evidence regarding safe recruitment when Ms Tracey was asked by Birmingham Children's Trust (BCT) to agree to the placement of NS, for whom a DoLs order was in place requiring a 3:1 staff ratio. On Ms Tracey's evidence the request was made on Friday 22 November and NS arrived on Tuesday 26 November 2024. Ms Tracey said within that very short time span she had set up a staffing rota covering two shifts a day, 10am to 10 pm and 10 pm to

10 am (with no waking night-staff). She said that there were 6 staff on days and sometimes she was the sixth MoS. She said that there were 12 MoS available when the placement started, and it went up to 15 or 16 over time. There were 7 core staff covering the shifts obtained via an agency.

51. The overall effect of Ms Tracey's evidence was that in the very short time between agreeing to accept NS and her arrival on 26 November, six members of staff had been safely recruited which, by use of the exceptional circumstances provision, meant that other members of staff could only work under supervision. In our view if this was achieved it would be remarkable. Ms Tracey has not taken the opportunity to produce any documentary evidence to show that the staff engaged in November 2024 had been safely recruited. Such documentation would include, copies of identification and DBS documents, receipt of two written references including one from the most recent employer, records regarding verification, so far as reasonably practicable, as to why the employment had ended, a full employment history together with a satisfactory explanation of any gaps in employment in writing, and risk assessments regarding staff working under supervision. No documentary evidence has been produced. Ms Tracey said that Ms Benson (the current proposed RI) had been involved in the recruitment but she has not provided a statement.
52. We are also asked to accept that in addition to recruitment, staff had been adequately trained/inducted. Again, no documentary evidence has been provided to support Ms Tracey's evidence, nor any confirmatory evidence from Ms Benson.
53. There are other features of the Respondent's reasoning that require consideration regarding the depth and quality of Ms Tracey's skills regarding the leadership and management of a home for children with EBD.

The Children's Guide

54. We find that the first draft of the Children's Guide (the CG) was inappropriate in a number of respects including that it referred to the issue of restraint. This and other matters were remedied by the August 2024 visit. However, if Mrs Cardozo-Evans is right in her evidence, at the August visit Ms Tracey maintained her view that the CG should continue to state that bedtime was midnight at weekends (for children as young as seven years old, even though Mrs Cardozo-Evans and Ms Powell considered this inappropriate, and suggested that the reference to any stated bedtimes should be omitted. We noted that in her response to the Scott Schedule, Ms Tracey said that set times for bedtimes, meal-times etc. is institutional abuse and she believes bedtimes and processes in the home need to be put together with each individual child. It is difficult to understand why she did not therefore simply delete the generic statement she had included in the CG.
55. We consider that Mrs Cardozo-Evans's account is reliable. In our view Ms Tracey was reluctant to accept that to state bedtimes to cover a range of children was inappropriate and failed to set proper boundaries for young children. Mrs Cardozo-Evans said that Ms Powell, the (then) proposed RI agreed with her. In particular, as Mrs Cardozo-Evans said, the CG is the primary tool that will be used by a social worker when seeking to engage a child regarding choice of placement. It is therefore unwise if the language used in the CG sets up a false expectation

regarding bedtimes. In our view the fact that this issue has persisted reflects poorly on Ms Tracey's ability to acknowledge that there may be a different perspective to her own, (which includes the views of the then proposed RI), and to adapt accordingly. It suggests a rigidity in thinking/understanding, and that Ms Tracey lacks the skills or attributes needed to consider and reflect on other views.

56. We accept that at the August visit Ms Tracey provided the Respondent with documentation regarding the adoption of various review procedures regarding the quality of care. In our view it is very notable that when asked how she would ensure she will have oversight of safeguarding incidents she said she would rely on staff to tell her if incidents were managed appropriately. In our view this is naive. It is one thing to produce a policy or review document template but quite another to ensure that there is effective leadership and management oversight of incidents. Incidents in children's homes meeting the needs of children with EBD are common. They may very often involve allegations against staff. The incidents that arise in children's homes always require management and leadership oversight of all the circumstances in order to inform the assessment of future risk and the steps necessary to address child protection/welfare. It is of critical importance to listen to the voice of the child and not to just rely on staff. If a member of staff is at fault, they may be less likely to report an incident or concern to the manager. In our view Ms Tracey's reliance on staff to let her know if incidents were managed properly is unsafe practice.

57. There were inconsistencies with the information in Ms Tracey's application and the information shared at the interview. She had stated in the form that she lived at 1072 Chester Road, Erdington, B24 0SA from 19 May 2006 and 15 July 2023 but Ms Tracey informed the inspector at interview that she lived in Wolverhampton whilst she operated the supported living provision (Coachchild) from 1072 Chester Road. It is common ground that Mrs Cardozo-Evans asked Ms Tracey for evidence to show that she had lived in Wolverhampton at the relevant time. Ms Tracey did not produce this at the time but has produced a bank statement addressed to her in Wolverhampton. Whilst we do not consider that this issue is overly important in the context of other matters requiring our consideration, we do not consider that a bank statement shows that Ms Tracey resided at the address in Wolverhampton.

References

58. Mrs Cardozo-Evans contacted the referees nominated to verify their references as required under Schedule 2. The information provided by two referees, Mr Newman and Mr Challinor, concerning past employment was negative. Another, (Red Door) was positive but related to work with adults over 25 years old.

59. We have carefully considered Ms Tracey's views which are to the effect that Mr Newman and Mr Challinor were both motivated to provide a poor reference. We recognise the risk that a reference from an employer may well be affected by personal issues and/or grievances.

60. Mr Newman (Next Step Residential Care - Glenavon House) stated that Ms Tracey still owed him in excess of £5000 for work he had undertaken with contractors to renovate Elmdene House. He said he would not employ Ms Tracey again. In considering his views as a whole we bear in mind that Ms Tracey was interim

manager with Next Step Residential Care for a very short period and had stepped into that role when the service was in crisis and had substantial compliance issues. In our view the supportive evidence of Ms Lee, who had been the RI at Glenavon House at the relevant time, places the matter into overall perspective.

61. Mr Challinor of Coven Homes said that in the last few weeks of her employment as RI Ms Tracey did not communicate well, failed to turn up to meetings and breached confidentiality by discussing management conversations during staff training. Amongst other matters, Mr Challinor explained his perspective regarding the regulation 40 notice made by Ms Tracey which was that she got the “wrong end of the stick” in a conversation about the member of staff (MoS) driving. She had wanted to stop the MoS driving immediately. Instead, risk assessments were put in place. Ms Tracey had said in a general discussion that this was fine. She then sent a regulation 40 notice to Ofsted.
62. Mr Challinor also said that Ms Tracey had wanted him to manage in the company she was setting up. He had declined this, and the relationship went downhill from there. He said that Ms Tracey is a very knowledgeable lady within unregulated/unregistered settings. He said also that “she talks the talk but she will be massively out of her depth without a massive amount of support around her.”
63. There is an inconsistency in Ms Tracey’s evidence in that she said in the application to Ofsted that her reasons for leaving Coven Homes was that it “became difficult to work there after I made a reg 40 notification.” On the facts, as shown by the regulation 40 notification on which she relies and the WhatsApp messages are that Ms Tracey resigned at the very same time that she provided the regulation 40 notification. That said, we recognise that the import of her evidence was that Coven Homes were ill-disposed towards her because of the regulation 40 notification.
64. We noted in passing that the concerns raised by Ms Tracey in the regulation 40 notification were not regarded as justified by the inspector who considered the matter. This does not negate that the fact of a regulation 40 notification might well have given rise to ill-feeling against Ms Tracey. We bore this fully in mind when considering the comments made by Mr Challinor to Mrs Cardozo-Evans. We noted that positive and negative comments were made. Overall, we came to the view that the views expressed by Mr Challinor were probably conscientiously made. He reflected on both favourable and negative aspects regarding Ms Tracey’s skills.
65. We consider that, of the two references from former employers that from Coven Homes appears more balanced and cogent.
66. It was wholly fair and appropriate for Ofsted to suggest that a character reference be obtained. We have taken into account the views of Mr Merrick as well as the positive character evidence of Ms Lee and Ms Olaniyan. Amongst other matters, we accept, as did Mrs Cardozo-Evans, that there are positive aspects regarding Ms Tracey’s practice in meeting the needs of children living in supported accommodation.
67. In our view, even if we discount the reference of Mr Newman, the positive evidence received does not provide adequate reassurance regarding the concerns raised by

Mr Challinor regarding Ms Tracey's communication and leadership skills. In our view the views he expressed resonate with the some of the issues of concern that emerged in the FPIs.

68. Finally, we note that Ms Tracey considers that a reference that is not related to any safeguarding matters is not a reason to refuse her application. We disagree because it is to be expected that a reference will refer to a range of matters including skills, professionalism and integrity. The fact that Ms Tracey still holds this view illustrates that her understanding as to the scope of safe recruitment, which includes the verification of references, is poor.

The use of passport/Deed poll issue

69. We find that the facts are that Ms Tracey used her former married name of Regnart to register her company in 2020. The fact is that the declaration which the Appellant signed on the deed Poll grant was very clear. It said this: "I shall at all times hereafter in all records, deeds, documents and other writings and on all occasions whatsoever shall use and subscribe the said name of Ms Joanne Tracey".

70. Mr Tracey's explanation is that:

- a) she used her old passport (in her former married name) as a matter of expedience because she did not want to apply for a new passport given the delays and cost involved in the context of the pandemic, and given that she did not need a passport in any event.
- b) she had been advised by a solicitor that this was in order provided she was not seeking to deceive anyone. She also told us that a google search had yielded the same information.

71. Ms Tracey also said that this issue was raised by an Inspector when she applied to be an RI in 2023 and her explanation was accepted. There was no challenge to this evidence. In our view in all the circumstances the use of her former name, in and of itself, is not sufficient for us to make a finding that Ms Tracey lacks integrity.

Integrity and good character regarding the appellant's decision to accept the placement of a child on 26 November 2025 in an unregistered setting

72. We considered **Wingate and Anr v SRA; SRA v Malins** [2018] EWCA Civ 366 where Lord Justice Rupert Jackson said at [102]:

"Obviously, neither courts nor professional tribunals must set unrealistically high standards, as was observed during argument. The duty of integrity does not require professional people to be paragons of virtue. In every instance, professional integrity is linked to the manner in which that particular profession professes to serve the public...."

In our view the importance of integrity, applying regulation 28, goes to the issue of whether the Respondent can reasonably trust that the applicant will be open and transparent with the regulator.

73. Ms Tracey said in her oral evidence that it is not uncommon for providers to operate without/before registration. Based on our experience in this field we are aware that there is a very marked shortage in the provision of children's homes across the UK and, in particular, settings able to provide the level and intensity of care that is required for children who are under a DoLs (Deprivation of Liberties) order. We are aware that local authorities (LAs) are hard pressed to find suitable accommodation for such children who are among the most vulnerable in society. We recognise that LAs do place children in unregistered homes. We are also aware that it has been known for Ofsted to register providers and/or managers who have been involved in the provision of unregistered care.
74. We have to decide the issues based on the facts before us and against the background that we have acknowledged. We recognise that Ms Tracey did inform BCT that her application for registration of Elmdene House had been refused and that she had provided BCT with the suite of documents they requested which included the NoPs and NoDs.
75. The fact is that Ms Tracey had been informed in both NoDs of the many reasons why Ofsted, the body responsible for registration, considered that Ms Tracey did not meet the requirements of regulations and, importantly, informed her that it is a criminal offence to operate without registration. In our view the core issue is what was going through Ms Tracey's mind when she decided to provide a home to a child at the request of BCT, despite her knowledge that the statutory body responsible for registration and regulation has refused her applications. Her oral evidence as to why she acted as she did was that she had spoken with BCT at length and had spoken with the placement manager for three hours. It was not a last-minute decision. The impact of her evidence was that she knew there was a department (i.e. in Ofsted) that does allow it, that they (i.e. BCT) would give feedback on her performance, and that her expertise is with these sorts of children. It was a combination of things. She also said that because of reassurances from the BCT that they were in communication with Ofsted she believed "it was okay".
76. In our view it is notable that Ms Tracey's consideration of the "combination of things" did not involve that Ofsted, the statutory regulator, had raised serious issues regarding the Appellant's skill as a manager and, not least, her ability to recruit staff in accordance with the regulation 32 and Schedule 2.
77. Ms Tracey says that she had been told by BCT that they would inform Ofsted of the placement. The email from Ms Knowles, Placements Commissioning Manager at BCT, dated 22 November 2024 states: "we do tell Ofsted if we place a child in an unregistered setting – they know these placements have to happen sometimes and we'd rather be transparent with them" On the evidence before us it is clear that BCT did not inform Ofsted that they had placed a child in an unregistered children's home, (and despite Ofsted's refusal of the applications), until early February 2025, but this is beside the point. Ms Tracey did not inform Ofsted herself until 11 February 2025 when she wrote to Ofsted Legal Services as follows:

"As Ofsted are aware we have a young lady with our service on a DoLs order since November 2024 and the local authority have completed monthly unannounced visits, the independent reviewing officer as well as the BCT TESS consultations,

the social workers and the head of service have been very happy with the work we have completed with the young person in such a short space of time so we have requested a reference or something similar to support our tribunal hearing, we weren't in a position to request this previously so I would like the opportunity to submit this."

78. Leaving aside the assertion as to Ofsted's knowledge, in our view the contents of this email and Ms Tracey's oral evidence tend to support that she had it in mind that she would be able rely on (future) evidence from BCT that would support her appeal. We note that there is no evidence from BCT within the bundle to express or support their view of Ms Tracey's work with NS.
79. We do not accept that Ms Tracey believed "it was okay" to proceed simply because of BCT's reassurance. In our view it is probable that she decided that her interests would be best served by proceeding to run an unregistered home. We also consider that if she had considered that the view of the statutory regulator commanded respect, (even though she disagreed with it), she would have informed Ofsted herself.
80. In her written closing submissions Ms Tracey stated "We always knew we had the option of applying to a number of local authorities and to open as an unregulated service, but we chose not to. It was the contact from the local authority and the reassurance that Ofsted would be notified and receiving this assurance in writing that convinced me to accept the referral. It was a mistake but it doesn't change the fact that I am of good character and integrity and this mistake doesn't change that."
81. In our view the simple fact that Ms Tracey chose to accept a placement from BCT and run an unregistered home contrary to section 11 of the Act does impact adversely on her integrity because it shows a disregard for the law. We can see that she was influenced by BCT. It is apparent that she thought that she might gain the support of BCT regarding her appeal. In our view the only real and proper "option" before her was to decide whether to act contrary to section 11 or not. There are very many situations where a registered provider or manager of a children's home has to place respect for the law and the regulations above their own interests, and to "do the right thing". She did not do "the right thing" because her choice involved breaking the law. She seeks to rely upon the success of the placement but this is, at best, retrospective justification. (As noted above the Appellant has not provided any supporting evidence from the BCT about the success of the placement or otherwise but this is beside the point). In our view the decision Ms Tracey made to disregard the law by operating an unregistered setting after she had been refused registration shows a profound lack of insight and very poor judgement. It also appears to us that her approach has been to seek to avoid responsibility for her own decision.
82. Ms Tracey has not satisfied us that she would not again disregard the law or the 2015 regulations in future. In our view she has demonstrated in this appeal that her interpretation of what is required to respect the regulations, and the law, is selective. We find that she has not demonstrated that she satisfies the requirements of regulation 28 (1) (a) as to integrity. Although there is a statutory power to impose conditions this is not realistic in a case where fundamental

aspects of the requirements have not been met, and were we have no real confidence that they will be met in future.

Summary

83. We acknowledge that Ms Tracey has worked in care for many years and has many strengths in her childcare practice. We have little doubt that she is a good support worker, and has some management skills. We do not doubt that her wish to provide a home for children with EBD is well-intentioned, and she has some relevant skills in this regard. She is also an accredited trainer. However, being a registered manager of a children's home is a challenging role that demands judgement and considerable skills (including organisational skills), as well as a thorough understanding of the regulations which are designed to ensure that very vulnerable children are kept safe and are able to fulfil their potential. For the reasons we have set out above, Ms Tracey has not satisfied us that she has the skills to be a registered manager of a children's home. In particular, we have little confidence that she understands or will meet the requirements of the regulations regarding safe recruitment. Further, Ms Tracey has not satisfied us that her integrity is such that she meets and will continue to meet all the requirements of the regulations.

84. In our view the application to be a registered provider falls at the first hurdle of regulation 26 (1) (a). In any event the provider appeal inevitably fails because there is no registered manager appointed as required under regulation 27.

Decision

Both appeals are dismissed. The Respondent's decisions dated 2 September 2025 are confirmed.

Judge Siobhan Goodrich

First-tier Tribunal (Health Education and Social Care)

Date Issued 16 April 2025