

Equality Impact Assessment (Level 2)

Section 1: Project overview

Project title: Proposed Sanctions Policy Review 2025	
Name of assessor: Allison Whitenack	Version: 1

What are the intended outcomes of this work?

The work is intended to set out the principles that practice committee panels (panels) should consider when deciding on the appropriate sanction, if any, in fitness to practise (FTP) cases. It is also intended to provide more clarity on the policy and to ensure the content is relevant and up to date. Since the last review in 2019, we have revised our standards¹ and updated and produced new Health and Care Professions Tribunal Service (HCPTS) Practice Notes.²

The HCPC recognises the significant impact of the proposed sanctions policy on both registrants and the general public, including service users and colleagues in health and care. As a core aspect of our regulatory function, it is essential that the policy is applied in a way that is fair, consistent, and free from bias.

The policy plays a key role in supporting panel members to make transparent, proportionate and equitable decisions that uphold public protection and maintain confidence in the regulatory process. The aim of the proposed changes is to ensure that decisions are fair, proportionate and consistent, and that sanctions are sufficient to protect the public and to promote and maintain appropriate standards and public confidence in the professions regulated by the HCPC.

The proposed changes are intended to support implementation of updated professional standards which came into effect on 1 September 2023 (standards of proficiency) and 1 September 2024 (standards of conduct, performance, and ethics), and reflect emerging caselaw and feedback from key stakeholders. They aim to provide greater clarity on the factors panels should consider in relation to apology and insight, professional boundaries, discrimination, seriousness and culpability, reasons for sanctions and striking off.

The HCPC has carefully considered the impact of the policy's position on discrimination, victimisation and harassment and has revised these sections accordingly to increase consistency, equity and clarity in the execution of the sanctions policy and tribunal process. We've also proposed some minor changes to style, language and tone to improve the accessibility and clarity of the document.

Who will be affected?

- panels;

¹ [Standards of proficiency](#) and [Standards of conduct, performance and ethics](#).

² [hcpts-practice-notes---consolidated.pdf](#)

- registrants³ and potential registrants, including students or trainees;
- the public, including service users and colleagues in health and care;
- education and training providers;
- legal representatives;
- health and care providers, professional bodies and consumer groups; and
- HCPC employees and partners.

Section 2: Evidence and Engagement

What evidence have you considered towards this impact assessment?

- new and relevant case law;
- revised standards and new Practice Notes;
- feedback and guidance from the Professional Standards Authority (PSA);
- HCPC fitness to practise annual report 2024;
- stakeholder feedback from pre-consultation engagement activities (described in the next section);
- internal team discussions, meetings or minutes; and,
- relevant published research.

How have you engaged stakeholders in gathering or analysing this evidence?

- We have discussed the proposals and collected feedback from the Equity, Diversity and Inclusion (EDI) Forum. Members of the forum are external stakeholders with expertise in EDI and lived experience; membership includes registrants and EDI professionals in relevant stakeholder organisations.
- We engaged the HCPC FTP Partnership Forum comprised of individuals from FTP and key professional bodies and unions.
- We've also engaged FTP partners who consist of panel members with expertise in FTP processes.
- We will continue to seek feedback from external stakeholders including professional bodies, the PSA, other regulators such as NMC and GMC, and employers, through our standing meetings and on an ad-hoc basis where necessary.
- We have discussed our proposals with HCPC's Council, which includes both registrant and lay members.

³ HCPC Regulates 15 professions: Arts therapists, Biomedical scientists, Chiropractors / podiatrists, Clinical scientists, Dietitians, Hearing aid dispensers, Occupational therapists, Operating department practitioners, Orthoptists, Paramedics, Physiotherapists, Practitioner psychologists, Prosthetists / orthotists, Radiographers, Speech and language therapists.

- We will carry out a public consultation on our proposed changes and ask the respondents to reflect on the impact of on groups with protected characteristics. Following the consultation period, we will analyse the responses and reshape our proposals where necessary.

Section 3: Analysis by equality group

The Equality and Human Rights Commission offers information on the [protected characteristics](#).

Summary

The proposed changes to the sanctions policy are intended to improve clarity for panels when applying sanctions; support fair and proportionate decision-making in FTP cases; reflect recent legal developments and feedback from key stakeholders; strengthen public protection and maintain trust in the regulatory process.

Overall, we believe that the changes will promote equality and fairness in the interpretation and application of the sanctions policy for all of the below groups. Most notably, we are proposing to clarify that all forms of discrimination are unacceptable and ensure appropriate action is taken in response to failure to maintain professional boundaries. This will support the protection of the public by providing a clearer context for how panels should address these issues.

Age

Registrants

- According to the HCPC fitness to practise annual report 2024,⁴ older registrants are more likely to be subject to decisions under our sanctions policy. This means that older registrants are more likely to be involved in the FTP process and therefore, more likely to be affected by the proposed changes. In particular older male registrants are overrepresented among those involved in the FTP process and are therefore likely to be disproportionately impacted by the FTP process.
- We will continue to explore the underlying causes of these trends and consider appropriate steps to mitigate any disproportionate impacts on particular groups where possible and appropriate.

General Public

- The general public, including service users and colleagues in health and care, are likely to be positively impacted by the proposals which are designed to ensure strong regulation and consistency in the sanctions process which safeguards public safety.

We are seeking feedback on equality impacts such as which service users are more or less likely to be impacted by breach of professional boundaries in our consultation and will ensure any identified impacts are considered in our analysis and response.

Disability

Registrants

- Registrants with disabilities are over-represented in FTP data.⁵ This is not unexpected as a registrant's failure to manage a health condition or disability could be a factor in their FTP

⁴ [hcpc-fitness-to-practise-annual-report-2023-24.pdf](#)

⁵ [fitness-to-practise-data---supplementary-analysis-2023-24.pdf](#)

referral process.⁶ This means that registrants with disabilities are more likely to be involved in the FTP process and therefore be disproportionately affected by the proposed changes.

- The proposed sanctions policy indicates that [effective remediation](#) may require a registrant to address concerns about their ability to manage their health to ensure they can practise safely. However, for some registrants with disabilities, the ability to fully remediate such concerns may be limited by the nature or severity of their condition. Therefore, the mitigating factors typically available to registrants in the FTP process may not always be available to registrants with disabilities. Registrants with disabilities are likely to be considered differently – although not less favourably – by this policy. However, these impacts may be unavoidable, given the central goal of public protection.
- The proposed sanctions policy identifies CPD and training as mitigating factors which should be considered by panels to assess seriousness and culpability during the FTP process. Registrants with disabilities are less likely to be in full-time employment,⁷ so remedial training may be less available to them.
- Furthermore, registrants with disabilities are more likely to be lower paid and may be less likely to afford the costs associated with CPD remediation.⁸
- Similarly, registrants with neurodiversity and/or cognitive differences may also be disproportionately impacted by the policy's clauses on remorse and apology if they do not make an apology or their apology is not considered sincere. Cultural factors may also affect whether or not somebody apologises, and how they frame an apology. The proposed sanctions policy [outlines that panels should be mindful](#) that neurodiversity and cultural differences may impact the expression of insight, remorse, or apology.
- Finally, registrants who have a disability are likely to benefit from the proposed changes which aim to increase protections against all forms of discrimination. Panels will be better able to identify and act on concerns raised in the FTP process where discrimination on these grounds has occurred.

We are seeking feedback on equality impacts such as whether registrants with specific characteristics are more or less likely to work independently or for an employer and how these impacts on access to training in our consultation and will ensure any identified impacts are considered in our analysis and response.

General Public

- We have proposed changes to emphasise the importance of panels providing reasons for their decisions at every stage. We anticipate this proposed change will better support the general public, including service users and colleagues in health and care with disabilities, in understanding the outcomes of the FTP process.
- We are continuing to investigate ways to engage service users in the FTP process to improve accessibility and transparency in the process while maintaining confidentiality. We are seeking feedback on this and other equality impacts in our consultation and will ensure any identified impacts are considered in our analysis and response.
- The general public, including service users and colleagues in health and care, are likely to benefit from the proposals which are designed to ensure strong regulation and consistency in the sanctions process to safeguard public safety.

⁶ [standards-of-conduct-performance-and-ethics-2024.pdf](#)

⁷ [The employment of disabled people 2024 - GOV.UK](#)

⁸ [Estimated £2 per hour pay gap for Disabled employees | Disability Rights UK](#)

Gender reassignment

Registrants

- When a sanction is applied to a registrant, the HCPC usually publishes details of that sanction, including the reason for the decision, online so that members of the public are able to see the registrant's FTP history. We are continuing to review how our approach to information governance and publication of FTP and sanctions data may disproportionately impact registrants who are transitioning. Our core objective remains public protection. Therefore, it is essential that all registrants remain identifiable and associated with the individual practitioner, and that when a registrant changes their name, or any other relevant identifying information, this association is not lost.
- We are committed to managing registrants' gender reassignment rights sensitively and lawfully in accordance with the Equality Act 2010 and the Gender Recognition Act 2004.
- The proposed sanctions policy aims to provide more information to increase protections against all forms of discrimination. Registrants who are transitioning are likely to be benefitted by the proposals which are designed to ensure strong regulation and protection against all forms of discrimination.

General Public

- Service users and colleagues in health and care who are undergoing gender reassignment are likely to benefit from the proposed changes which aim to increase protections against all forms of discrimination. Panels will be better able to identify and act on concerns raised in the FTP process where discrimination on these grounds has occurred.
- The general public, including service users and colleagues in health and care, are likely to benefit from increased consistency and robustness of the sanctions process which is intended to enhance public protection.
- Through our proposals, we propose to clarify our commitment to preventing discrimination against all individuals on the basis of any protected characteristics, while also safeguarding the interests of the wider public. We believe that not implementing these proposals, could undermine both regulatory effectiveness and public confidence.

Marriage and civil partnerships

Registrants

- No differential impacts have been identified relating to registrants who are married or in civil partnerships. Registrants who are divorced or separated are more likely to be involved in our FTP processes.⁹ Although this is not covered by this protected characteristic, we are seeking feedback on equality impacts in our consultation and will ensure any identified impacts are considered in our analysis and response.

General Public

- No differential impacts have been identified relating to the general public, including service users and colleagues in health and care, who are married or in civil partnerships. The HCPC online concerns form¹⁰ will enable us to gather more information about protected characteristics of those who make a complaint enabling us to gather more information about this in the future. We are seeking feedback on equality impacts in our consultation and will ensure any identified impacts are considered in our analysis and response.

⁹ Table 8: Registrants with one or more FTP concern in 2023/24, counts and percents by marriage and civil partnership, <https://www.hcpc-uk.org/globalassets/resources/2024/fitness-to-practise-data---supplementary-analysis-2023-24.pdf>

¹⁰ [How to make a complaint to the Health and Care Professions Council \(HCPC\) | The HCPC](#)

- The general public, including service users and colleagues in health and care, are likely to be positively impacted by the proposals which are designed to ensure strong regulation and consistency in the sanctions process to safeguard public safety.

Pregnancy and maternity

Registrants

- Because of the temporary nature of the protected characteristic, the data we have for this is limited – for example, we would not be able to definitively say if the women involved in our FTP processes had ever been covered by the protection in the Equality Act, so could not say whether being pregnant or recently giving birth affected the likelihood of being impacted by the proposed sanctions policy. However, research has shown that people returning to work after breaks in practice can need additional support to ensure they are able to practise safely¹¹ and that without this support, there is a risk that they could be more likely to be involved in fitness to practise processes.
- The proposed sanctions policy identifies CPD and training as mitigating factors which should be considered by panels to assess seriousness and culpability during the FTP process. Remedial training including CPD may be more accessible to registrants in full-time employment. However, registrants who are pregnant, on maternity leave, or have caring responsibilities are less likely to be in full-time employment or may have taken career breaks, so these mitigating factors may be less available to them. As a result, they may have fewer opportunities to demonstrate the types of actions or behaviours that are viewed favourably in the FTP process.
- Our proposals recognise the potential barriers faced by some registrants such as those who are pregnant, on maternity leave or have caring responsibilities.

General Public

- Service users and colleagues in health and care who are pregnant, on maternity leave or have childcare responsibilities are likely to be positively benefited by the proposed changes which aim to increase protections against all forms of discrimination. Panels will be better able to identify and act on concerns raised in the FTP process where discrimination on these grounds has occurred.
- The general public, including service users and colleagues in health and care, who are pregnant, on maternity or have caring responsibilities, is expected to benefit from the proposed changes, which aim to strengthen regulation and promote greater consistency in the sanctions process to safeguard public safety.

Race

Registrants

- Registrants who may be subject to race-based discrimination by their HCPC-registered colleagues are likely to be positively impacted by the proposed changes to the policy which increase protection against all forms of discrimination.
- One of the proposed changes to the policy is to clearly define insight, remorse, and apology as distinct mitigating factors in the sanctions process to provide clarity and more tailored guidance for panels. However, registrants from overseas, and those from non-UK backgrounds, and other countries may have different cultural understandings of the

¹¹ <https://www.gmc-uk.org/education/hidden-documents/sharing-good-practice/supporting-those-returning-from-a-break-in-clinical-work>

appropriateness or expression of apologies in FTP processes.¹² Different cultural factors and lived experience may impact on whether or not someone apologises, or how they frame an apology or insight.

- To support fairer assessments, explanations of apologies and remorse have been expanded to support the panel in assessing the impact of presence of an apology during the sanction process. The proposed change includes clarifying that while an apology might be considered a mitigating factor, it should not be considered an admission of guilt and should not be considered an aggravating factor when assessing appropriate sanctions. This proposed change should increase fairness and ultimately serve in the best interest of the public. Furthermore, guidance has been added to ensure panels consider the various reasons why an apology may not be given.
- According to the Fitness to Practise Data: Supplementary Analysis 2023-24,¹³ while most FTP concerns are for registrants reporting white ethnicities, registrants reporting non-white ethnicities are more likely to be subjected to an FTP concern than their white counterparts. Therefore, non-white registrants are likely disproportionately impacted by the proposed sanctions policy.
- Similarly, the above Supplementary Analysis shows that while the majority of registrants with one or more FTP concern are UK nationals, registrants from Africa and North and South America are more likely to have one or more FTP concern. Therefore, registrants from these continents are more likely to be subject to a decision under the proposed sanctions policy and our proposed changes.
- One of the key determinants in the outcomes of the FTP process is whether or not a registrant has legal representation. Registrants who are of non-UK nationality or national origin are less likely to have access to legal representation and may be disproportionately impacted by the policy as a result. We encourage panels to apply the sanctions policy consistently, reducing the impact of having legal representation.

We are seeking feedback on equality impacts in our consultation and will ensure any identified impacts are considered in our analysis and response.

General Public

- The proposed changes broaden the scope of discrimination that panels should consider in FTP cases to more inclusively encompass people's experiences of discrimination – not only unlawful discrimination related to protected characteristics but also all forms of discrimination.
- The general public, including service users and colleagues in health and care, are likely to be positively impacted by the proposals which are designed to ensure strong regulation which safeguards public safety.

Religion or belief

Registrants

- Registrants who are subjected to discrimination on the basis of religion are likely to be positively benefited by the proposed changes which aim to increase protections against all forms of discrimination. Panels will be better able to identify and act on concerns raised in the FTP process where discrimination on these grounds has occurred.
- No further differential impacts have been identified relating to registrants based on religion or belief. Our data does not show any significant relationships between religion and the

¹² [Maddux, W., Kim, P.H., Okumura, T. and Brett, J.M. 2011. Cultural differences in the function and meaning of apologies. *International Negotiation*, 16\(3\): 405-425.](#)

¹³ [fitness-to-practise-data---supplementary-analysis-2023-24.pdf](#)

likelihood of being involved in our FTP processes. We are seeking feedback on equality impacts in our consultation and will ensure any identified impacts are considered in our analysis and response.

General Public

- Similarly, service users and colleagues in health and care who are subjected to discrimination on the basis of religion are likely to be positively benefited by the proposed changes which aim to increase protections against all forms of discrimination. Panels will be better able to identify and act on concerns raised in the FTP process where discrimination on these grounds has occurred.
- No further differential impacts have been identified relating to the general public, including service users and colleagues in health and care, based on religion or belief. We are seeking feedback on equality impacts in our consultation and will ensure any identified impacts are considered in our analysis and response.
- The general public, including service users and colleagues in health and care, are likely to be positively impacted by the proposals which are designed to ensure strong regulation to safeguard public safety.

Sex

Registrants

- FTP data¹⁴ shows that males are consistently more than two times more likely to have one or more FTP concerns than women of the same age group. Furthermore, the percentage of males with an Investigating Committee Panel decision is considerably higher than females by nearly ten percentage points. However, females are more likely to receive a sanction from tribunals than males. The HCPC is continuing to investigate these data and consider the differential impacts on registrants by sex.
- As mentioned previously regarding disability, pregnancy, and maternity, registrants who take time off or have career breaks may find that remedial training is less available to them. Women are more likely to take career breaks or work part time due to pregnancy/maternity or other caring responsibilities and, therefore, be disproportionately impacted.
- The proposed changes now include greater clarity regarding sexually motivated misconduct to support panels considering matters involving sexual misconduct or sexually motivated misconduct. This aims to ensure panels have a consistent and fair approach in their decision making for registrants.

We are seeking feedback on equality impacts in relation to failures to maintain professional boundaries or discrimination in our consultation, and will ensure any identified impacts are considered in our analysis and response.

General Public

- The changes to the policy's section on sexual misconduct and sexually motivated misconduct will add clarity and support the general public, including service users and colleagues in health and care, who raise concerns and reports to the HCPC.
- The general public, including service users and colleagues in health and care, are likely to be positively impacted by the proposals which are designed to ensure strong regulation which safeguards public safety.

¹⁴ [fitness-to-practise-data---supplementary-analysis-2023-24.pdf](#)

Sexual orientation

Registrants

- Registrants who are subjected to discrimination on the basis of sexual orientation are likely to be positively benefited by the proposed changes which aim to increase protections against all forms of discrimination. Panels will be better able to identify and act on concerns raised in the FTP process where discrimination on these grounds has occurred.
- No further differential impacts have been identified relating to the sexual orientation of registrants, and our data does not show any significant or strong relationships between sexual orientation and the likelihood of being involved in our FTP processes. We are seeking feedback on equality impacts in our consultation and will ensure any identified impacts are considered in our analysis and response.

General Public

- Similarly, service users and colleagues in health and care who are subjected to discrimination on the basis of sexual orientation are likely to be positively benefited by the proposed changes which aim to increase protections against all forms of discrimination. Panels will be better able to identify and act on concerns raised in the FTP process where discrimination on these grounds has occurred.
- No further differential impacts have been identified relating to the general public, including service users and colleagues in health and care, based on sexual orientation. We are seeking feedback on equality impacts in our consultation and will ensure any identified impacts are considered in our analysis and response.
- The general public, including service users and colleagues in health and care, are likely to be positively impacted by the proposals which are designed to ensure strong regulation to safeguard public safety.

Other identified groups

1. Socio-economic background:

- One of the key determinants in FTP outcomes is whether a registrant has legal representation.¹⁵ Registrants from a lower socio-economic background or those with limited access to family or community resources may be less likely to access legal representation in the FTP process meaning they could be disproportionately impacted as a result of this lack of access. This could be particularly exacerbated by other intersecting factors such as nationality or national origin.

2. Criminal justice history

- The proposed sanctions policy has a general policy of not allowing registrants who have been convicted of a serious criminal offence, conviction, or caution from continuing to or return to unrestricted practice until their sentence has been satisfactorily completed. Given the known and well-documented disparities within the criminal justice system, those groups that are overrepresented in the criminal justice system may be impacted disproportionately by this policy. However, panels are instructed that it may be disproportionate to impose a suspension or removal from the Register solely because part of the sentence remains outstanding. Therefore, panels should carefully consider the nature of the offence, the stage of the sentence, and any evidence of rehabilitation when determining an appropriate sanction.
- The proposed sanctions policy clearly states that the role of the panel is not to impose additional punishment to any already imposed by the courts, but to protect the public and the wider public interest. Therefore, the panel must provide clear reasoning for its

¹⁵ [The concept of seriousness in fitness to practise – a cross-regulatory research](#)

decisions at every stage of the process to provide clarity for both the registrant and the general public.

We are seeking feedback on any further equality impacts in our consultation and will ensure any identified impacts are considered in our analysis and response.

Four countries diversity

We will be engaging stakeholders across the UK nations to seek their feedback on our proposals. Any issues identified through our consultation and engagement process that are specific to any of the UK nations will be carefully considered in preparing our response to the consultation.

Section 4: Welsh Language Standards

What effects does this policy have on opportunities for persons to use the Welsh language and engage with our commitments under the Welsh Language Standards?

The new revised policy will be translated and published in Welsh.

Overall, the proposed changes to the policy intend to provide greater clarity and support for panels and registrants as well as to protect the public. Given that the changes are largely in language, style and tone to remain consistent with new Practice Notes and case law, we do not believe that these proposals impact our commitments under the Welsh Language standards.

How does this policy treat the Welsh language no less favourably than the English language?

The proposed policy will be translated and published in Welsh and English.

Otherwise, we do not believe that these proposals impact on our commitments under the Welsh Language standards.

Section 5: Summary of Analysis

What is the overall impact of this work?

We expect the proposed changes to have overall positive impacts for registrants and the general public, providing clarity and consistency for the sanctions process to stay up to date with new Practice Notes and case law.

Most of the impacts indicated above in section 3 highlight the ways that the proposed sanctions policy more broadly might impact different groups in different ways. We acknowledge that the changes to the policy may also disparately impact these groups in similar ways. Generally, the changes that we are proposing are aimed at increasing the clarity and consistency of the policy and an appropriate response to all forms of discrimination and failures to maintain professional boundaries which we believe will mitigate instances of inequitable impacts to various groups.

The proposed changes relate to interim orders, insight and remorse, seriousness and culpability, sexual misconduct and sexually motivated misconduct and discrimination. The improved clarity of the guidance on these issues is intended to support the panel in making fair and consistent decisions. Therefore, we anticipate this to have a positive impact on fairness and equity in the sanctions process.

Proposed changes to suspension orders, interim orders, striking off, assessing seriousness and culpability, professional boundaries and dishonesty all include clarification and expansion of guidance on these topics in order to support the panel in their function. Each of these changes is anticipated to provide a clearer context and lead to more consistent and reasoned decision-making. It is possible that the proposed changes may impact certain groups differently. Some of these differences may be as a consequence of some groups being disproportionately represented within our FTP processes (which this policy has no influence over), and some may be because certain mitigating factors may be more difficult for some groups to evidence, as described above. HCPC will continue to consider how to mitigate disproportionate impacts where appropriate and possible.

Overall, we believe these proposed changes are necessary to ensure we can continue to meet our public protection obligations. We are committed to exploring these issues further and to adding suitable mitigations into any final policy materials and guidance.

Section 6: Action plan

Summary of action plan

As indicated above, we are seeking views on our changes to the proposed sanctions policy. Our proposal aims to create an equitable, fair, and transparent policy for sanctions in use by the sanctions panels. We will seek to minimise and mitigate any adverse impacts.

We will undertake the following actions to review and improve our proposals where necessary and monitor EDI impacts:

- We will carry out a full public consultation on our proposed changes. The consultation will ask respondents a series of questions to obtain feedback on our proposals. The consultation will specifically inquire for additional information about the potential negative or positive equality impacts of these proposals and for information about potential mitigations to those with protected characteristics.
- We will seek input from groups who share protected characteristics and organisations that represent them about the impacts of the proposals in respect of their protected characteristics as well as seeking general feedback on these issues from employers, professional bodies, panels, and service users.
- If our proposals are accepted, we will continue to monitor any potential impacts of these changes on registrants and members of the general public with one or more protected characteristics who engage with or are impacted by the sanctions policy. We will take appropriate action to redress any negative effects.
- We will also continue to take feedback from our EDI forum and external informal feedback from any interested parties, with a view to informing any future policy development in this area.

How will the project eliminate discrimination, harassment and victimisation?

Maintaining HCPC's ability to be an effective regulator is key to ensuring that registrants and members of the public needing and receiving healthcare are not subject to discrimination, harassment and victimisation, either by prevention or by addressing through our work registering and supporting our registrants or our FTP process. We believe this proposed policy clarifies elements of the sanctions policy to further promote this aim, to provide fairness and equity in the sanctions process, and generally promote the protection of the public.

How will the project advance equality of opportunity?

Maintaining the HCPC's ability to be an effective regulator is key to ensuring that registrants are able to provide healthcare services equitably and based upon patient need, and that members of the public are able to access effective and appropriate healthcare services in a timely manner. This proposal will ensure that the sanctions policy is executed with more fairness and clarity for registrants and members of the public.

How will the project promote good relations between groups?

Securing these changes will support equality by maintaining public protection and ensuring positive service outcomes are delivered for the public irrespective of their background, including their protected characteristics.

Reflection completed by: Allison Whitenack

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Reflection approved by: Eniola Awoyale

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