

**Professional Conduct Committee
Initial Hearing**

16 – 17 August 2023

Name: SATTAR, Haleema

Registration number: 259762

Case number: CAS-201098

General Dental Council: Christopher Saad, Counsel
Instructed by IHLPS

Registrant: Not present and not represented

Fitness to practise: Impaired by reason of misconduct

Outcome: Erased

Immediate order: Immediate suspension order

Committee members: Martin Isherwood (Chair, DCP member)
Gezala Umar (Dentist member)
Anita Clay (Lay member)

Legal adviser: Jeffrey Widdup

Committee Secretary: Sara Page

Preliminary matters

1. At the commencement of the hearing on 16 August 2023, the Committee was informed that Miss Sattar was neither present nor represented. As a result, Mr Saad, on behalf of the General Dental Council (GDC), made the following applications:

Decision on service of Notice of Hearing

2. In Miss Sattar's absence, the Committee first considered whether the Notice of Hearing ('the Notice') had been served on her in accordance with Rules 13 and 65 of the '*General Dental Council (Fitness to Practise) Rules Order of Council 2006*' ('the Rules').
3. The Committee had regard to the indexed hearing bundle of 72 pages, which contained a copy of the Notice, dated 12 July 2023. The Notice was sent to Miss Sattar's registered address by Special Delivery on 12 July 2023, in accordance with Section 50A of the '*Dentists Act 1984*' (as amended) ('the Act') and via email on the same date.
4. The Committee was satisfied that the Notice contained proper and correct information relating to today's hearing. This included the time, date, charges, and that it is being conducted remotely via Microsoft Teams, as well as notification that the Committee has the power to proceed with the hearing in Miss Sattar's absence.
5. The Committee was provided with information that demonstrated delivery of the Notice had been attempted on Thursday 13 July 2023 but there had been no answer at Miss Sattar's registered address. However, it noted that it is a requirement of the Rules that the Notice is served, not that it is received.
6. In light of the information available, the Committee was satisfied that Miss Sattar has been served with proper notification of this hearing, at least 28 days before its commencement, in accordance with the Rules.

Decision on whether to proceed in the absence of Miss Sattar

7. The Committee next considered whether to exercise its discretion to proceed with the hearing in the absence of Miss Sattar and any representative on her behalf. The Committee was mindful that its decision to proceed in the absence of Miss Sattar must be handled with the utmost care and caution.
8. Mr Saad invited the Committee to consider not only Miss Sattar's interests but also the public interest in the expeditious disposal of this case when coming to its decision on proceeding in her absence.
9. The Legal Adviser reminded the Committee of the requirement to be fair to both parties, as well as considering the public interest in the expeditious disposal of this case.
10. The Committee noted that no application for an adjournment had been made by Miss Sattar and, in the light of her non-engagement since May 2022, there was no information before the Committee that adjourning these matters would secure her attendance at a later date.
11. In all these circumstances, the Committee determined that it was fair and in the public interest to proceed with the hearing in the absence of Miss Sattar.

Decision and reasons on the facts

12. The Committee considered all the evidence presented to it and took account of the closing submissions made by Mr Saad on behalf of the GDC. The Committee accepted the advice of the Legal Adviser. It considered each head of charge separately, bearing in mind that the burden of proof rests with the GDC and that the standard of proof is the civil standard, that is, whether the alleged facts are proved on the balance of probabilities.

Evidence

13. The Committee had regard to three documents as follows:

- GDC hearings bundle, including two witness statements;
- Unredacted copy of the original web complaint form, dated 2 July 2021; and
- Copy of the second web complaint form, contained within an email dated 20 October 2021.

Committee's findings

14. The Committee's findings in relation to each head of charge are as follows:

Charge 1

"That, being a registered dental care professional, on 2 July 2021, you submitted a webform complaint to the General Dental Council ("the GDC") regarding another GDC registrant ("Person A") stating that:

- a) *"Person A smokes weed and takes other recreational drugs";*
- b) *"I could see that he had not slept and he was not making very much sense";*
- c) *"Every time I went to see him, he looked like he did not want to be there and like he was rushing to get me out of the surgery";*
- d) *"The treatment he carried out was not very good at all";*
- e) *"My teeth feel worse than they did before and i have a lot of sensitivity and my teeth keep on chipping";*
- f) *"He is also not very gentle, i got mouth sores and tears at the corner of my mouth";*
- g) *"I informed him that his gloves are hurting the corner of my mouth and he continued and did not listen"*
- h) *"He has had many previous complaints."*

PROVED, in its entirety

- 15. In coming to its decision, the Committee bore in mind all the evidence in this case, along with the advice provided by the Legal Adviser and the relevant case law referred to.
- 16. The Committee had regard to the document entitled 'Original Webform Complaint' (Exhibit 2) which clearly showed the name of the person completing the form as "Miss Haleema Sattar" along with her email address which corresponded with the email address recorded in the GDC Register.
- 17. There is no evidence that anyone other than Miss Sattar had completed the form and had contacted the GDC in May 2022 subsequent to being sent a letter regarding the complaint that she had made, and no objection was made by her that she had not completed the form.
- 18. In this regard, the Committee concluded that Miss Sattar had submitted the form, dated 2 July 2021, which included the statements detailed at charges 1a) to 1h), and therefore found **Charge 1 proved in its entirety**.

Charge 2

"That, being a registered dental care professional, on 18 October 2021, you submitted a webform complaint to the GDC stating that "I would like to withdraw a complaint made by me in June 2021 as none of the allegations are true. Reference- CAS-197824-R7Q0W3."

PROVED

19. The Committee had regard to an email, dated 20 October 2021, which included what appeared to be an excerpt from a webform in a similar format to Exhibit 2, but much condensed. The information included in that excerpt, including the case reference number and Miss Sattar's personal details, matched those in the original webform. The Committee also noted the statement within the webform which stated, "...complaint made by me..." which it accepted was confirmation that the person wishing to withdraw the complaint was the same person who had made it previously.
20. Although the Committee had not been provided with a copy of the webform in its entirety, it was satisfied that the information provided was sufficient for it to conclude that it was indeed a webform. The Committee found, on the balance of probabilities, that it was submitted by Miss Sattar because it contains the same personal data as the previous webform.
21. Therefore, the Committee concluded that Miss Sattar had submitted the webform withdrawing her previous complaint about Person A and found **Charge 2 proved**.

Charge 3

"That, being a registered dental care professional, your conduct in relation to allegation 1a) and/or 1b) and/or 1c) and/or 1d) and/or 1e) and/or 1f) and/or 1g) was:

- a) *Misleading;*
- b) *Dishonest, in that you knew that the information that you provided to the GDC was false as confirmed by yourself on the webform submitted to the GDC on 18 October 2021.*

PROVED, in its entirety

22. The Committee first considered charge 3a) and whether Miss Sattar's conduct in relation to Charge 1 was misleading. It referred to the advice of the Legal Adviser who reminded the Committee that information could be considered to be misleading if information was provided which was inaccurate.
23. The Committee bore in mind that Miss Sattar accepted that the allegations were not true citing this as the reason for her request to withdraw the complaint regarding Person A. In this regard, the Committee was satisfied that this was misleading as it was more likely than not that Miss Sattar knew at the time that she submitted Exhibit 2 that the information contained within it was not true.
24. Therefore, the Committee found **Charge 3a) proved**.
25. In its consideration of dishonesty, the Committee referred to the guidance provided in the GDC document, '*Guidance for the Practice Committees including Indicative Sanctions Guidance*'. In the section entitled 'Dishonesty', the Committee paragraph 54:

"When making decisions on charges involving dishonesty, the Committee must first establish whether or not the conduct took place, and if so, what the Registrant's state of mind was at the time."
26. On the basis of the information before the Committee, it accepted that the information provided was inaccurate in Exhibit 2 and Miss Sattar knew it not to be true, leading her to subsequently retract her complaint.
27. The Committee did not consider there to be any other reasonable explanation, nor any identifiable evidence, for Miss Sattar's conduct other than her having acted in a manner she knew to be dishonest in that she lied in making her initial webform complaint. The Committee also took into account the clear and cogent evidence that Miss Sattar herself said in the second webform that *"...none of the allegations are true."*
28. Having found that Miss Sattar was aware that the information she provided was not true, the

Committee was also satisfied that Miss Sattar must have been aware that any objective observer would consider that providing information that is known to be inaccurate would be considered dishonest.

29. Therefore, the Committee found **Charge 3b) proved**.

Charge 4

“That, being a registered dental care professional, you failed to cooperate with an investigation conducted by the GDC due to:

- a) Failing to respond to an email sent by the GDC to your registered email address on 11 May 2022 which asked for confirmation of your contact details;*
- b) Failing to respond to a letter sent by the GDC to your registered address on 16 May 2022 which asked for details of your working arrangements and proof of indemnity;*
- c) Failing to respond to a letter sent by the GDC to your registered address on 1 June 2022, which asked for the information requested on 16 May 2022;*
- d) Failing to provide evidence of your indemnity insurance as requested by the GDC.”*

4a), 4c) and 4d) PROVED

4b) NOT PROVED

- 30. In relation to Charge 4a), the Committee had regard to the email, dated 11 May 2022, in which the GDC contacted Miss Sattar asking her to confirm that the contact details held on record were correct. The email stated that if Miss Sattar did not provide a response by 13 May 2022, it would proceed to send a letter to the postal address held for Miss Sattar on the Register.
- 31. In his written witness statement, Mr Fisher (GDC Fitness to Practise Caseworker) confirmed that no response to the email has been received and, as a result, the GDC proceeded to send correspondence to Miss Sattar’s registered postal address after 13 May 2022.
- 32. The Committee accepted Mr Fisher’s evidence as there was no evidence to the contrary to dispute his account.
- 33. Therefore, the Committee concluded that Miss Sattar had failed to cooperate with the GDC investigation by failing to respond to the email dated 11 May and found **Charge 4a) proved**.
- 34. In relation to Charge 4b), the Committee had regard to the letter dated 16 May 2022. The Committee also had regard to the printout of the Royal Mail ‘Track and trace’ service showing delivery of the letter on 17 May 2022 at 12:02 and the ‘Record of telephone call’ document, dated 17 May 2022 and timed 12:30, created by Mr Fisher.
- 35. The ‘Record of telephone call’ showed that Miss Sattar had telephoned the GDC enquiring about the “*emp [employment] details*” and confirmed that she “*had not been working*”.
- 36. In his submissions, Mr Saad stated that the GDC did not consider Miss Sattar’s telephone call to be a response to the GDC’s letter as she did not provide the information that was requested in the letter dated 16 May 2022, namely:
 - **Working arrangements**
Details of where you are working now and where you were working at the time the concern relates to...
 - **Proof of indemnity**
Proof that you have indemnity arrangement in place both now and at the time the

concern relates to.

37. Mr Saad confirmed that the letter sent to Miss Sattar dated 16 May 2022 included a form which detailed the information that Miss Sattar was required to provide. He submitted that informing Mr Fisher over the telephone that she was not working was not adequate and completion of the form was required.
38. The Committee noted that the time of the telephone call was less than 30 minutes after the letter was recorded as having been delivered to Miss Sattar's postal address on 17 May 2022. The Committee considered that it appeared from the information before it that Miss Sattar had contacted the GDC as soon as she had received the 16 May 2022 letter and confirmed that she was not working. It noted that the allegation is that she failed to cooperate with the investigation by failing to respond to the letter asking for her employment details and information regarding her indemnity cover. Although the Committee accepted that Miss Sattar had not completed the form included with the 16 May 2022 letter, it did not consider that she had failed to cooperate with the GDC investigation as she had telephoned the GDC upon receipt of the letter to inform it that she *"had not been working"*. The Committee bore in mind that whilst Miss Sattar was not working, she did not require indemnity cover.
39. In this regard, the Committee concluded that the GDC had failed to prove that Miss Sattar had failed to cooperate with the GDC investigation as the allegation does not refer to the adequacy of her response.
40. Therefore, the Committee found **Charge 4b) not proved.**
41. In relation to Charge 4c), the Committee had regard to the letter, dated 1 June 2022, which reminded Miss Sattar of her obligation to provide the information requested in the 16 May 2022 letter. The Committee noted that in the telephone conversation with Mr Fisher on 17 May 2022, he had recorded, *"Said they had not been working. I said to state that in the form."* The Committee considered that it was clear from the information in the letter, as well as the oral confirmation from Mr Fisher over the telephone, that she was required to complete the form and provide the information requested in writing.
42. The Committee accepted Mr Fisher's evidence that Miss Sattar had not contacted or engaged with the GDC beyond the telephone call on 17 May 2022 and that attempts to contact her had been unsuccessful.
43. As Miss Sattar has not provided the GDC with a completed form, as required, or written confirmation of her employment details and indemnity cover relating to the relevant time period, the Committee was satisfied that she had failed to cooperate with the GDC investigation by failing to respond to the letter dated 1 June 2022.
44. Therefore, the Committee found **Charge 4c) proved.**
45. In relation to Charge 4d), the Committee bore in mind that no evidence has been adduced pertaining to Miss Sattar's indemnity cover, either currently or at the time of the concern.
46. The form included with the letters dated 16 May and 1 June 2022 required completion of two boxes – one regarding current indemnity cover and one regarding previous indemnity cover. Both boxes contain the statement, *"If you are/were not indemnified please provide reasons below."*
47. Although the Committee has already accepted that if a registrant is not working, they are not required to be indemnified, the Committee noted that Miss Sattar has not provided any information regarding her indemnity cover. In not having not provided any information regarding her indemnity cover, either in writing or otherwise, the Committee was satisfied that Miss Sattar has failed to cooperate with the GDC investigation.
48. Therefore, the Committee found **Charge 4d) proved.**

Decision and reasons on fitness to practise and sanction

49. Having announced its decision on Stage 1, the Committee then moved on to consider whether the facts found proved amount to misconduct and, if so, whether Miss Sattar's fitness to practise is currently impaired. In accordance with Rule 20 of the Fitness to Practise Rules 2006, the Committee heard submissions from Mr Saad, on behalf of the GDC, in relation to matters of misconduct, impairment and sanction.
50. The Committee heard and accepted the advice of the Legal Adviser.

Submissions

51. In his oral submissions, Mr Saad reminded the Committee that there is no statutory definition of misconduct. To assist the Committee, he referred it to the case of *Roylance v General Medical Council* [2000] 1 AC 311 where Lord Clyde described misconduct as "*a word of general effect, involving some act or omission which fell short of what would be proper in the circumstances.*"
52. Mr Saad confirmed that Miss Sattar has no previous fitness to practise history.
53. Mr Saad submitted that by lodging and subsequently withdrawing the complaint against Person A containing dishonest information and failing to cooperate with the GDC's investigation, Miss Sattar's actions clearly amount to misconduct.
54. On the matter of impairment, Mr Saad invited the Committee to consider the GDC document, 'Standards for the Dental Team (Revised 2014)' and referred to the particular standards which, in his submission, were relevant in this case. Mr Saad submitted that this is an evidence-driven process and the evidence before the Committee is unanswered in respect of Miss Sattar's dishonesty and failure to cooperate with the GDC. Due to Miss Sattar's complete disengagement from this process, there is no evidence of insight, remediation, or remorse. Therefore, he submitted that as a result of the risk of repetition, public safety and public confidence can only be maintained by a finding of current impairment.
55. On the matter of sanction, Mr Saad invited the Committee to consider paragraph 63 of the GDC document, '*Guidance for the Practice Committees, including Indicative Sanctions Guidance 2016 (ISG)*' (revised December 2020). He submitted that this paragraph was extremely important because it applies directly to the position this Committee is considering due to the seriousness and the nature of the dishonesty in this case.
56. In light of Miss Sattar's disengagement from this process and the absence of any explanation for her dishonest and uncooperative conduct, he submitted that her conduct is fundamentally incompatible with remaining on the Register. He stated that Miss Sattar allowed her dishonest representations regarding Person A to linger for a number of months and then failed in her unequivocal duty to cooperate with the GDC and frustrated the regulatory process.
57. Mr Saad referred the Committee to the case of *Professional Standards Authority v (1) Nursing and Midwifery Council (2) Judge* [2017] EWHC 817 (Admin) and reminded the Committee that any thoughts that Miss Sattar may choose to engage in the future and/or demonstrate remorse or remediation is unsupported "*wishful thinking*" as there is no evidence before the Committee to support this. He reminded the Committee that even when Miss Sattar withdrew her complaint, there was no apology for her having lied, or for the potential distress the complaint may have caused to others. He told the Committee that the complaint was not relayed to Person A but this was a matter of chance, and it may well have been the case that Person A would have had to contend with the GDC pursuing baseless allegations.
58. Therefore, Mr Saad submitted that the appropriate and proportionate sanction in this case is that of erasure.

Committee's findings on misconduct

59. In reaching its decision on misconduct, the Committee recognised its statutory duty to protect the public and maintain public confidence in the profession and exercised its own professional judgement.
60. The Committee was mindful of the principle that not every departure from required standards will be sufficiently serious to amount to misconduct. The departure must be sufficiently serious to be characterised properly as misconduct going to fitness to practise. The Committee bore in mind that in order to meet that threshold, the failure must be such that it would be regarded as 'deplorable' by fellow members of the profession.
61. The Committee considered the standards referred to by Mr Saad in his submissions and determined that Miss Sattar had breached the following:

Standard 1.3:

You must be honest and act with integrity

Standard 9.4:

You must co-operate with any relevant formal or informal inquiry and give full and truthful information

9.4.1

If you receive a letter from the GDC in connection with concerns about your fitness to practise, you must respond fully within the time specified in the letter. You should also seek advice from your indemnity provider or professional association.

62. The Committee noted that when Miss Sattar made the nine false allegations against Person A, she allowed them to remain in the GDC's system for three months before she withdrew them, stating only "...none of the allegations are true..."
63. Whilst the Committee acknowledged that she retracted her complaint and stated it was untrue, her dishonesty in having made the allegations in the first place was a direct breach of standards above.
64. Accordingly, the Committee determined that the facts found proved are serious and amount to misconduct.

Committee's decision on impairment

65. The Committee then considered whether Miss Sattar's misconduct is remediable, whether it had been remedied, and whether there was any risk of repetition. The Committee also had regard to the wider public interest, which includes the need to uphold and declare proper standards of conduct and behaviour to maintain public confidence in the profession and this regulatory process.
66. The Committee noted Mr Saad's submission that the Committee should not only consider whether Miss Sattar's fitness to practise was impaired at the time, but also whether it remains impaired today.
67. In this case, Miss Sattar has provided absolutely no evidence that she has any insight into her misconduct, beyond her email saying the allegations were not true. The email did not offer an apology or any acknowledgment of the potential harm she could cause to Person A, the wider public, or the GDC by making malicious and serious allegations that she knew not to be true. Miss Sattar has completely disengaged from the process and has failed in her duty to cooperate with her regulator to date.
68. In the absence of any evidence of remorse or apology, remediation, or insight, the Committee is of the view that there is a risk of repetition of dishonesty.

69. Miss Sattar's dishonesty had the potential to cause harm to Person A financially, professionally and personally. Therefore, a finding of impairment is necessary on the ground of public protection.
70. The Committee bore in mind the overarching objective to maintain public confidence in the profession and upholding standards. It concluded that public confidence would be undermined if a finding of impairment were not made in this case where a registrant had lied to their regulator and had not cooperated with the subsequent investigation and therefore also finds Miss Sattar's practice impaired on the ground of public interest.

Committee's decision on sanction

71. In coming to its decision on sanction, the Committee considered what action, if any, to take in relation to Miss Sattar's registration. It took into account the ISG. The Committee reminded itself that any sanction imposed must be proportionate and appropriate and, although not intended to be punitive, may have that effect.
72. The Committee took into account the following aggravating features:
 - Acted dishonestly;
 - Potential reputational and/or financial harm to Person A;
 - Breached trust that the public have in the profession;
 - Breached trust of the GDC as its regulator;
 - Wilful disregard of the role of the GDC and the systems regulating the profession; and
 - Lack of evidence of insight, remorse, or apology.
73. The Committee also took into account the following mitigating features:
 - No previous fitness to practise history;
 - Withdrawal of the false allegations; and
 - It appears to be an isolated event.
74. Due to the dishonesty identified in this case, the Committee referred to the ISG to assist it with deciding on a suitable sanction, in particular paragraph 63, which stated:

"Where dishonesty is a central feature of a Committee's decision, there will always be a severe risk of a registrant's name being erased from the register. Where little remorse, regret or insight is demonstrated, or where a registrant fails to cooperate with an investigation, engage with the final hearing or persists in misconduct, then this may point to a more serious sanction needing to be imposed to ensure public confidence in the profession is not undermined and that proper professional standards of conduct are maintained."
75. The Committee found paragraph 63 particularly helpful as this is a case where there has been absolutely no evidence from Miss Sattar demonstrating that she has any remorse, regret or insight. She has persistently failed to cooperate and therefore the Committee was satisfied that Miss Sattar's conduct, not only at the time of the incident but since, is a considerable departure from the conduct and behaviour expected of a registered professional.
76. In coming to its decision on sanction, the Committee had regard to its previous findings on misconduct and impairment and considered each sanction in ascending order of severity.
77. The Committee first considered whether to issue a reprimand but concluded that this would be inappropriate in view of the seriousness of the dishonesty and failure to cooperate with the GDC in this case. The Committee considered Miss Sattar's misconduct to be at the higher end of the spectrum and therefore it would be neither proportionate nor in the public interest to allow Miss Sattar to return to practice without some form of restriction in place.

78. The Committee next considered whether placing conditions on Miss Sattar's registration would be a sufficient and appropriate response. Given Miss Sattar's complete disengagement from the regulatory process, and in the absence of information pertaining to her current employment, it was of the view that there are no practical or workable conditions that could be formulated given the seriousness of the misconduct identified. In addition, it did not consider that conditions would adequately address the public interest in this case.
79. The Committee then went on to consider whether a suspension would be the appropriate sanction. The misconduct in this case was a serious and significant departure from the standards expected of a dental nurse, which has been followed by a persistent failure to engage with the GDC and the regulatory process.
80. In addition, the Committee bore in mind the submissions of Mr Saad, who advised the Committee against any "*wishful thinking*" that Miss Sattar may choose to engage on the future and/or demonstrate insight and remediation in the future. It also bore in mind paragraph 6.29 of the ISG which states:

"The PCC is able to specify appropriate and practical actions for the Registrant to carry out during the period of suspension. It should be possible to verify the completion or otherwise of any such actions. Impossible when there is a failure of the registrant to engage with the process."

81. In the absence of any engagement from Miss Sattar since May 2022, which was limited to a telephone call, the Committee could not be confident that Miss Sattar would be willing to reflect on her misconduct and engage with the process at a later date.
82. The Committee noted the serious breach of fundamental tenets set out in the Standards and therefore concluded that suspension would not adequately address the seriousness of the dishonesty and misconduct identified or satisfy the wider public interest in the matter.
83. Therefore, the Committee moved on to consider erasure. The ISG states removal from the register may be suitable where most of the following factors are present:
 - serious departure(s) from the relevant professional standards;
 - where serious harm to ... other persons has occurred, either deliberately or through incompetence;
 - serious dishonesty, particularly where persistent or covered up;
 - a persistent lack of insight into the seriousness of actions or their consequences.
84. The Committee has already identified that Miss Sattar lied to her regulator and then failed to cooperate with the subsequent regulatory process resulting in a serious departure from the GDC's standards. There has been no acknowledgment of the potential harm and distress caused to Person A as a result of Miss Sattar's deliberate false allegations and no explanation afforded for her behaviour. The Committee has not been provided with any evidence of apology, remorse, insight or remediation.
85. Balancing all these factors, the Committee directs Miss Sattar's name be erased from the Register. The Committee was of the view that the findings in this case demonstrate that allowing Miss Sattar to remain on the register would seriously undermine public confidence in the profession. Erasure is the only sanction that would appropriately address the misconduct in this case and send the public and the profession a clear message about the standards expected of a dental nurse. To adequately protect the public, including the wider public interest, nothing short of removal from the register would be sufficient.
86. The Committee now invites submissions as to whether an immediate order should be imposed to cover the 28-day appeal period.

Decision on immediate order

87. The erasure does not come into effect until the end of the appeal period or, if an appeal is lodged, until it has been disposed of. The appeal period expires 28 days after the date on which the notification of the determination is served on Miss Sattar.
88. In this regard, Mr Saad informed the Committee that Miss Sattar has been subject to an interim order prior to these proceedings and invited the Committee to revoke that order with immediate effect. In relation to the immediate order, he made an application for an immediate suspension to be imposed on Miss Sattar's registration on both grounds of public protection and in the wider public interest.
89. Having had regard to the submissions made by Mr Saad, and following its decision on the substantive order, the Committee was satisfied that it was appropriate to revoke the existing interim order imposed upon Miss Sattar's registration with immediate effect.
90. In relation to the immediate order, the Committee has determined that, given the risks that it has identified, it would be illogical and inconsistent to permit Miss Sattar to practise before the substantive direction of erasure takes effect and therefore an immediate order is necessary.
91. In all the circumstances, the Committee considers that an immediate order of suspension is consistent with the findings that it has set out in its main determination and is necessary to protect the public and is otherwise in the public interest.
92. The immediate suspension will remain in place until any appeal is disposed of or, if no appeal is lodged, the erasure will replace the immediate order 28 days after Miss Sattar is sent the decision of the Committee in writing.
93. That concludes this determination.