

Notice of Decision of the Northern Ireland Social Care Council's Fitness to Practise Committee

Name: Malgorzata Anna Antonowicz

SCR No: 6030814

NOTICE IS HEREBY GIVEN THAT the Fitness to Practise Committee of the Northern Ireland Social Care Council, at its meeting on **15 August 2019**, made the following decision about your registration with the Northern Ireland Social Care Council:

The Committee found the facts proved by admission;

The Committee found that your fitness to practise is impaired by reason of your Caution;

The Committee decided to make a Conditions of Practice Order for a specified period of SIX months.

The Conditions of Practice are:

1. You must notify the Social Care Council within 14 days of any social care appointment (whether paid or unpaid) you accept within the UK or elsewhere, and provide the Social Care Council with contact details of your employer.
2. You must inform the Social Care Council of any professional investigation started against you and / or any professional disciplinary proceedings taken against you within 14 days of you receiving notice of them.
3. (a) you must within 14 days of accepting any post or employment requiring registration with the Social Care Council, or any course of study connected with social work or social care, provide the Social Care Council with the name / contact details of the organisation offering the post, employment or course of study.

(b) you must within 14 days of entering into any arrangements required by these conditions of practice provide the Social Care Council with the name and contact details of the individual / organisation with whom you have entered into the arrangement.
4. At any time you are employed or otherwise providing social care, you must place yourself and remain under the supervision of a workplace line manager, mentor or supervisor nominated by your employer. You must confine your practice in social care to working at all times with another social care worker.
5. You must work with your line manager, mentor or supervisor to formulate a Personal Development Plan specifically designed to address the deficiencies in the following areas of practice:
 - Undertake training in the management of service users with behaviours of concern.

6. You must meet with your line manager, mentor or supervisor at least every month to discuss the standard of your performance and your progress towards achieving the aims set out in your Personal Development Plan.
7. You must forward to the Social Care Council a copy of your Personal Development Plan within 28 days of you taking up an appointment as a social care worker.
8. Within 3 months of these conditions coming into effect, you must submit a written reflective account, the content of which must be to the satisfaction of the Social Care Council. Your reflective account should specifically address:
 - a. An understanding of why and how your behaviour and practice breached the Standards of Conduct and Practice;
 - b. An understanding of the potential impact of your behaviour on Service User A;
 - c. What your subsequent learning has been;
 - d. What you would do differently in the future.
9. You must send a report from your line manager, mentor or supervisor setting out the standard of your performance and your progress towards achieving the aims set out in your Personal Development Plan to the Social Care Council no earlier than **03 February 2020** and no later than **14 February 2020**.
10. You must allow the Social Care Council to exchange, as necessary, information about the standard of your performance and your progress towards achieving the aims set out in your Personal Development Plan with your line manager, mentor or supervisor or any other person who is or will be involved in your training and supervision with any employer, prospective employer, and at any educational establishment.
11. You must immediately inform the following parties that you are subject to a Conditions of Practice Order under the Social Care Council's fitness to practise procedures, and disclose the conditions listed at 1 to 10 above, to them:
 - Any organisation or person employing, contracting with, or using you to undertake social care;
 - Any agency you are registered with or apply to be registered with (at the time of application);
 - Any prospective employer (at the time of application);
 - Any educational establishment at which you are undertaking a course of study connected with social work or social care, or any such establishment to which you apply to take such a course (at the time of application).
12. The Conditions of Practice Order is imposed for a period of 6 months.

Particulars of the Allegation:

That, being registered under the Health and Personal Social Services Act (Northern Ireland) 2001 (as amended), and whilst working as a Care Assistant for Homecare Independent Living (employer):-

1. On or about the 16 August 2018 at Newry Courthouse, you accepted a Police Caution for the offence of Common Assault on Service User A in their home on 27 September 2017.

And that by reason of the matters set out above, your fitness to practise is impaired by reason of your Caution in the United Kingdom for a criminal offence.

Procedure:

The hearing was held under the fitness to practise procedure.

Attendance:

The Registrant was in attendance and was represented by Lindsay Boal, Counsel, instructed by Carson Thompson Solicitors. The Council was represented by Miss Helen Bergin, Solicitor, DLS.

Application to Admit Hearing Bundle

Miss Bergin confirmed to the Committee that the hearing bundle provided to it complied with the requirements of relevance and fairness, and that the Registrant had made no objections to its contents. Ms Boal confirmed this position. The Committee accepted the bundle into evidence and marked it as Exhibit 1.

Background

The Registrant is registered as a care assistant on Part 2 of the Register. She commenced employment as a care assistant for Homecare Independent Living on 19 January 2007. She worked in the Banbridge area and provided care to service users in a community setting. The Northern Ireland Social Care Council ('the Council') received an Employer Referral Form regarding the Registrant dated 26 October 2017.

On 16 August 2018, the Registrant accepted an Adult Caution for common assault on Service User A. A copy of the Certificate of Caution is contained within the bundle before the Committee. The bundle also contained statements, one from a witness who alleged that she observed the Registrant acting in the manner complained of, together with three other witness statements from persons in managerial roles with the Registrant's employer, who were involved in the subsequent disciplinary enquiry into the Registrant's actions.

The Committee noted that the Registrant had in November 2018 written to the Council to give an explanation for what occurred on the date in question. She described Service User A's challenging behaviour and her concerns about Service User A, which she had raised with management and were not addressed.

Finding of Facts

The Registrant admitted the Particulars of the Allegation and signed an Agreed Statement of Facts:

- The Registrant is a Domiciliary Care Worker registered on Part 2 of the Northern Ireland Social Care Council Register.
- The Registrant was admitted to Part 2 of the Register on 7th April 2017.
- The Registrant commenced employment as a Care Assistant for Homecare Independent Living on 19 January 2007. She worked in the Banbridge area.
- On Wednesday 27th September 2017 the Registrant, alongside Care Assistant [NAME REDACTED], attended a morning call with Service User A at their home.
- Upon their arrival, the service user was in bed. The Registrant prepared her medication and [NAME REDACTED] prepared her clothes and water for her personal care.
- [NAME REDACTED] started to undress the service user, and both she and the Registrant then started to wash her.
- The Registrant washed the top half of the service user's body, whilst [NAME REDACTED] washed the bottom half.
- The Registrant did not offer the face cloth to the service user.
- Whilst washing the service user the Registrant opened out the face cloth and with pressure covered the service user's face, with the face cloth, for approximately 5-10 seconds.
- The Registrant then repeated that process to dry the service user's face in the same way with a large bath towel.
- When washing the service user's chest, the Registrant put her left arm over the service user's arms and held her down.
- The Registrant washed the service user in a rough manner, leaving her chest red.
- [NAME REDACTED] reported the incident to her manager, [NAME REDACTED] on 29th September 2017.
- The Registrant was suspended by her employer on 9th October 2017 and the matter was reported to Adult Safeguarding and the PSNI.
- The Registrant was referred by her employer to the Council on 27th October 2017.
- The allegation against the Registrant on the Employer Referral Form was that on 27th September 2017, the Registrant was physically rough with the service user A and used inappropriate restraint whilst carrying out personal care.
- [NAME REDACTED] provided a witness statement to the PSNI on 11th November 2017.
- The Registrant was interviewed by the PSNI on 22nd November 2017 at 1355hours and 1416hours.
- The Public Prosecution Service proceeded to prosecute the Registrant for common assault arising out of events on 27th September 2017.

- The Registrant admits she accepted a Police caution for common assault on Service User A in their home at Newry Courthouse on 16th August 2018.
- The Registrant admits that she was physically rough with Service User A in their home whilst carrying out personal care on 27th September 2017.
- The Registrant admits that she used inappropriate restraint on Service User A in their home whilst carrying out personal care on 27th September 2017.
- The Registrant admits that her actions amounted to misconduct.
- The Registrant admits that at this time, her fitness to practise was impaired.'

The facts were found proved by admission.

Fitness to Practise

The Committee proceeded to consider if the Registrant's practise is currently impaired. The Committee heard a submission from Miss Bergin, who said that the Registrant's Caution for Common Assault called into question her ability to work in social care services and to remain on the Register without restriction or to be registered at all. She referred the Committee to the Standards of Conduct and Practice for Social Care Workers, which she submitted that the Registrant's Caution breached as follows: 1 – 1.2, 5 – 5.1, 5.8 and 6 – 6.1, 6.3 and 6.11.

She told the Committee that the Registrant's Caution and conduct fell far below the minimum standard expected of a registered social care worker, and called into question her fitness to practise. She submitted that the Registrant's actions constituted ill treatment and an assault on Service User A in her own home. In considering insight, she referred the Committee to the notes of the PSNI interview carried out with the Registrant, and suggested that at this stage the Registrant had not fully admitted the allegation. However, in her solicitor's letter, dated 07 May 2019, the Registrant then confirmed that she was aware that her actions were inappropriate and expressed great remorse. Miss Bergin submitted that there remained a risk that the Registrant would repeat her actions unless she demonstrated that she no longer presented an ongoing risk of doing so. In addressing the public interest, Miss Bergin said that the Registrant's actions on 27 September 2017 were serious, resulting in her accepting a Police Caution for Common Assault on Service User A. She referred the Committee to the case of CHRE v NMC & Grant 2011 and submitted that the public interest and confidence in the social care profession would be undermined if a finding of current impairment was not made in these particular circumstances.

The Committee considered the submissions from Miss Bergin and Miss Boal, and had regard to all of the evidence in the case.

The Committee heard a submission from Ms Boal on behalf of the Registrant. She referred the Committee to the letter from the Registrant's solicitor, dated 07 May 2019. She said that the Registrant does not wish to minimise this incident. She said that she is remorseful and horrified that this has happened. However, there was an extreme lead up to this incident. She told the Committee that Service User A was very unpleasant to care workers and, in particular, to the Registrant because she is Polish. She said that Service User A was abusive to

the Registrant and spat at her. The Registrant was therefore reluctant to attend to Service User A, and notified her manager of the difficulties and tried to exchange her duties with other care workers. She said that the Registrant felt alone when dealing with this and, on this occasion, was pushed to her limit. She submitted that the Registrant had done her best for this service user in the past, and had on one occasion purchased food for her from her own funds. She said that she has reflected considerably on this incident and now knows that her mistake was not taking her concerns higher up the management chain. She further stated that the Registrant now knows that when pushed to her limits, to remove herself from the situation. She advised that the Registrant had been working with Homecare Independent Living for ten years as a carer before this incident, and that there had been no previous complaints regarding her work. She is still working for Homecare Independent Living in a non-caring role. However, she wishes to return to work as a carer as she has a love for this job. She wishes to earn the trust of her colleagues and demonstrate that she will not repeat her actions.

The Committee accepted the advice of the Legal Adviser. She referred the Committee to the Standards of Conduct and Practice for Social Care Workers, and advised it to adopt a sequential approach when considering the application on impairment. In particular, she asked it to take into account the nature of the Caution for Common Assault against the Registrant, and reminded the Committee that it is being asked to determine whether the Registrant's fitness to practise is impaired because of this Caution. She referred the Committee to Paragraph 24 Schedule 2 of the Rules, and the requirements as set out in the case of the GMC v Cohen, looking at the current competence and behaviour of the Registrant along with the need to protect service users, members of the public, the upholding of proper standards of behaviour and maintaining of public confidence in the social care profession. She further referred the Committee to the findings of Dame Janet Smith in the 5th Shipman Report as regards the potential causes of impairment. She also referred the Committee to the cases of GMC v Meadows 2006 and CHRE v NMC & Grant 2011.

The Committee considered whether the Registrant's fitness to practise is impaired by reason of her Caution as set out in the Particulars of the Allegation.

The Committee, in considering the issue of impairment of fitness to practise, took account of Paragraph 24 (3) of Schedule 2 of the Rules which states that it should have regard to:

- (a) whether it is satisfied as to the reason for the alleged impairment of fitness to practise;
- (b) the Standards of Conduct and Practice issued by the Council under Section 9 of the Act;
- (c) whether the impairment is capable of remediation;
- (d) whether the impairment has been remediated;
- (e) the risk of repetition; and
- (f) the public interest.

The Committee noted that the Registrant's Caution for Common Assault was a serious matter, involving a vulnerable service user receiving care from the Registrant in her own home.

The Committee had regard to the Standards of Conduct and Practice for Social Care Workers and the Council guidance entitled 'Making a Determination of Impaired Fitness to Practise: Guidance for Committees on Remediation'. The Committee is satisfied that the Registrant's actions were in breach of the following Standards of Conduct:

Standard 1: As a social care worker, you must protect the rights and promote the interests and wellbeing of service users and carers. This includes:

- 1.2 Treating people with consideration, respect and compassion; and
- 1.8 Respecting and maintaining the dignity and privacy of service users.

Standard 5: As a social care worker, you must uphold public trust and confidence in social care services. In particular you must not:

- 5.1 Abuse, neglect or harm service users, carers or colleagues; or
- 5.8 Behave in a way, in work or outside work, which would call into question your suitability to work in social care services.

Standard 6: As a social care worker, you must be accountable for the quality of your work and take responsibility for maintaining and improving your knowledge and skills. This includes:

- 6.1 Meeting relevant standards of practice and working in a lawful, safe and effective way.

In considering the issue of insight by the Registrant into her actions on 27 September 2017, the Committee took into account her documentary submission and the submission from Ms Boal, along with the testimonial from her employer dated 08 June 2017. The Registrant has also expressed remorse and regret for her behaviour and indicated what she would do differently, if presented with similar circumstances. Whilst the Registrant has continued her employment with Homecare Independent Living, she has not worked as a carer since this incident and therefore the Committee has no evidence as regards her putting into practice what she has learned from the past. The Registrant, in providing care to Service User A, was in a position of trust and her actions amounted to a serious breach of this trust. The Committee therefore considered that there continues to be risk of repetition of her behaviour as the Registrant, although expressing genuine remorse for her actions, has not had an opportunity to remediate her behaviour.

The Committee concluded that the Registrant's Caution for Common Assault brings the social care profession into disrepute, and that the public would find it totally unacceptable that a registrant cautioned in these circumstances remained on the Register without restriction. Although the Registrant accepted the Caution for Common Assault and indicated what she would do differently, the Committee is concerned that there remains a risk that the Registrant could repeat her behaviour, particularly as she has not worked in a caring role since this incident.

In all of the circumstances, the Committee concluded that a finding of impaired fitness to practise is, therefore, necessary for the maintenance of public confidence in the social care profession and the Council as its regulator,

and that public confidence in the social care profession would be undermined if a finding of impaired fitness to practise was not made.

Therefore, the Committee concluded that the Registrant's fitness to practise is currently impaired by reason of her Caution.

Sanction

In reaching its decision on sanction, the Committee considered the submissions from Miss Bergin and Ms Boal, on behalf of the Registrant, and had regard to all of the evidence in this case.

Miss Bergin referred the Committee to the Northern Ireland Social Care Council Indicative Sanctions and Use of Interim Orders: Guidance for Fitness to Practise Committees ('the Guidance'). She said that there were no previous disciplinary matters as regards this Registrant and that the issue of sanction was a matter of decision for the Committee. She reminded the Committee that the Registrant's Caution for Common Assault was a serious matter which raised issues of public interest. She acknowledged that the Registrant now shows evidence of insight, has expressed regret and has indicated a willingness to change her behaviour. In considering the risk of repetition, she asked the Committee to note that the Registrant has not worked in social care since 2017 and therefore was unable to provide evidence that she has mitigated against the risk of repetition.

Ms Boal submitted to the Committee that in light of its findings at the fitness to practise stage, the Committee would be likely to consider a sanction appropriate. She accepted that, equally, a Warning would not address the Committee's concerns. She suggested that the Committee consider imposing a Conditions of Practice Order, which would allow the Registrant to be tested on her performance. She said that the sanctions of suspension and removal were neither suitable nor required in these circumstances. She reminded the Committee that the Registrant has engaged throughout the Council's investigation and would like the opportunity to demonstrate how she would do things differently.

The Committee accepted the advice of the Legal Adviser. She referred the Committee to the Indicative Sanctions and Use of Interim Orders: Guidance for Fitness to Practise Committees ('the Guidance'), and reminded the Committee to consider the question of sanction in ascending order of severity, paying particular attention to the issue of proportionality.

She referred the Committee to Paragraph 26 of Schedule 2 of the Rules which provides that, upon a finding of impairment of fitness to practise, the Committee may:

- (a) impose no sanction; or
- (b) warn the Registrant and direct that a record of the warning should be placed on the Registrant's entry in the Register for a specified period of up to 5 years; or
- (c) make a Conditions of Practice Order for a specified period not exceeding 3 years; or
- (d) make an Order suspending the Registrant's registration for a specified period not exceeding 2 years (a 'Suspension Order'); or

- (e) make an Order for removal of the Registrant's registration from the Register ('a Removal Order');
- (f) revoke any Interim Order imposed by the Preliminary Proceedings Committee.

She further reminded the Committee that in deciding which sanction to impose, the Committee should take into account:

- (a) the seriousness of the Particulars of the Allegation;
- (b) the degree to which the Registrant has fallen short of any expected standards;
- (c) the protection of the public;
- (d) the public interest in maintaining confidence in social care services; and
- (e) the issue of proportionality.

The Committee has applied the principles of fairness, reasonableness and proportionality, weighing the public interest with the Registrant's interests, and taking into account any aggravating and mitigating factors in the case. The public interest includes the protection of members of the public including service users, the maintenance of public confidence in the profession and the declaring and upholding of proper standards of conduct and behaviour within the profession. The Committee took into account its powers under Paragraph 26 of Schedule 2 of the Rules in relation to the sanctions available to it, and also had regard to the Council's Indicative Sanctions and Use of Interim Orders: Guidance for Fitness to Practise Committees, bearing in mind that the decision on sanction is one for its own independent judgement.

The Committee recognises that the purpose of sanction is not to be punitive, although a sanction may have a punitive effect. The Committee considered the aggravating and mitigating factors in this case.

The Committee considers the aggravating factors to be:

- The Registrant's Caution for Common Assault related to a vulnerable service user and involved an abuse of trust where the Registrant was providing care in the service user's home.
- The Registrant's actions carried with them the potential to cause harm to the service user.
- The Registrant failed to provide evidence of full insight into the effects of her behaviour on the service user.
- The Registrant has not worked as a social care worker since October 2017 and provided no evidence of actual remediation or rehabilitation.

The Committee considers the mitigating factors to be:

- There were no previous concerns raised with the Council.
- The Registrant accepted a Police Caution for Common Assault.
- There was no evidence of actual harm to Service User A.
- The Registrant co-operated with the Council and expressed genuine remorse for her actions.

- This was an isolated incident and Service User A was described as challenging and often verbally abusive to staff.
- The Registrant raised with management the difficulties she was encountering with Service User A and no action was taken to assist her.

Having balanced the aggravating and mitigating factors, the Committee considered that a sanction was appropriate and proceeded to consider which sanction to apply in this case.

Warning - the Committee considered the issue of a Warning in this case. It bore in mind that the imposition of a Warning for a period of time would not protect the public from the risk of repetition and consequent risk of harm to members of the public. The Committee considered that the Registrant's Caution for Common Assault is a serious matter and breached the Standards of Conduct and Practice for Social Care Workers. Although the Registrant has expressed regret for her actions and provided insight into her behaviour and how she would do things differently in the future, the Committee has no evidence of rehabilitative steps taken by the Registrant. Therefore, a Warning would not be proportionate or appropriate in these circumstances.

Conditions of Practice Order - the Committee next considered a Conditions of Practice Order. The Committee noted the Guidance at Paragraph 4.13, which states that conditions may be appropriate in cases involving particular areas of a registrant's performance and where a Committee is satisfied that it is appropriate for an individual to remain on the Register. The shortcomings in the Registrant's practice arose out of a single incident when the Registrant was providing care for a challenging service user. The Registrant is described by her employer, prior to this incident, as providing an excellent standard of care, and at times exceeding the challenging requirements and expectations of the role of care assistant. Her colleague, who was with her at the time of the incident, gave evidence that she had worked alongside the Registrant on numerous occasions and never had any issues with her conduct and practice. She further stated that she considered the Registrant to be a good care assistant and that on the occasion of 27 September 2017, the Registrant had been 'pushed to her limit'. The Committee therefore considers that a Conditions of Practice Order would provide the Registrant with the opportunity to demonstrate her ability to work and provide care for vulnerable service users in challenging circumstances and, in doing so, show what she has learnt. The Registrant, through her Counsel, indicated her willingness to work with conditions of practice.

The Conditions of Practice will be as follows:

1. You must notify the Social Care Council within 14 days of any social care appointment (whether paid or unpaid) you accept within the UK or elsewhere, and provide the Social Care Council with contact details of your employer.
2. You must inform the Social Care Council of any professional investigation started against you and / or any professional disciplinary proceedings taken against you within 14 days of you receiving notice of them.

3. (a) you must within 14 days of accepting any post or employment requiring registration with the Social Care Council, or any course of study connected with social work or social care, provide the Social Care Council with the name / contact details of the organisation offering the post, employment or course of study.

(b) you must within 14 days of entering into any arrangements required by these conditions of practice provide the Social Care Council with the name and contact details of the individual / organisation with whom you have entered into the arrangement.
4. At any time you are employed or otherwise providing social care, you must place yourself and remain under the supervision of a workplace line manager, mentor or supervisor nominated by your employer. You must confine your practice in social care to working at all times with another social care worker.
5. You must work with your line manager, mentor or supervisor to formulate a Personal Development Plan specifically designed to address the deficiencies in the following areas of practice:
 - Undertake training in the management of service users with behaviours of concern.
6. You must meet with your line manager, mentor or supervisor at least every month to discuss the standard of your performance and your progress towards achieving the aims set out in your Personal Development Plan.
7. You must forward to the Social Care Council a copy of your Personal Development Plan within 28 days of you taking up an appointment as a social care worker.
8. Within 3 months of these conditions coming into effect, you must submit a written reflective account, the content of which must be to the satisfaction of the Social Care Council. Your reflective account should specifically address:
 - a. An understanding of why and how your behaviour and practice breached the Standards of Conduct and Practice;
 - b. An understanding of the potential impact of your behaviour on Service User A;
 - c. What your subsequent learning has been;
 - d. What you would do differently in the future.
9. You must send a report from your line manager, mentor or supervisor setting out the standard of your performance and your progress towards achieving the aims set out in your Personal Development Plan to the Social Care Council no earlier than **03 February 2020** and no later than **14 February 2020**.
10. You must allow the Social Care Council to exchange, as necessary, information about the standard of your performance and your progress towards achieving the aims set out in your Personal Development Plan with your line manager, mentor or supervisor or any other person who is or will be involved in your training and supervision with any employer, prospective employer, and at any educational establishment.

11. You must immediately inform the following parties that you are subject to a Conditions of Practice Order under the Social Care Council's fitness to practise procedures, and disclose the conditions listed at 1 to 10 above, to them:
- Any organisation or person employing, contracting with, or using you to undertake social care;
 - Any agency you are registered with or apply to be registered with (at the time of application);
 - Any prospective employer (at the time of application);
 - Any educational establishment at which you are undertaking a course of study connected with social work or social care, or any such establishment to which you apply to take such a course (at the time of application).
12. The Conditions of Practice Order is imposed for a period of 6 months.

In considering sanction, the Committee did look at the next sanction in order of gravity, namely suspension. The Committee concluded that as it is satisfied that the Registrant's behaviour is remediable, this sanction would not be appropriate, and that a Conditions of Practice Order is the most appropriate and proportionate sanction in all of the circumstances.

You have the right to appeal this decision to the Care Tribunal. Any appeal must be lodged in writing within 28 days from the date of this Notice of Decision.

You should note that the Fitness to Practise Committee's decision takes effect from the date upon which it was made.

The effect of this decision is that specified Conditions of Practice have been placed on your entry in the Register for a period of SIX months (15 AUGUST 2019 – 14 FEBRUARY 2020).

Early Review

The Fitness to Practise Committee may, at your request, review the Conditions of Practice Order before the end of the period for which the Order has been imposed if there has been a material change of circumstances since the Order was imposed.

Additionally, the Council may request an early review of the Conditions of Practice Order if it receives information which suggests that the Order has not been complied with.

The Committee may, after early review of a Conditions of Practice Order, vary or revoke the terms of the existing Order, or replace the existing Order with a Suspension Order.

Review at Conclusion of Sanction

A review of your fitness to practise will be undertaken towards the end of the period for which the Order has been imposed. The Council will write to you no later than 14 weeks before the expiry of the Order to request evidence to determine compliance with the imposed conditions of practice.

Following the Council's review, the matter may be referred for review by the Fitness to Practise Committee. If the Committee reviews the Order and it is satisfied that your fitness to practise remains impaired, it may impose a further Order to commence upon expiry of the existing Order, or it may impose a Suspension Order to commence upon expiry of the existing Order, or it may vary the terms of the existing Order, or it may revoke the existing Order and impose a Removal Order.

C. Chabel Ned

Regulatory Committee Manager

20 August 2019

Date