

**ROYAL COLLEGE OF VETERINARY SURGEONS**

**-v-**

**Dr SUE DYSON**

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**DECISION ON APPLICATION FOR RESTORATION**

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1. The Disciplinary Committee of the Royal College of Veterinary Surgeons convened to hear an application for restoration to the Register by Dr Dyson. Mr Bradly QC appeared on behalf of the College. Dr Dyson attended and represented herself. The hearing was conducted virtually using Zoom.
2. The original case against Dr Dyson concluded on 9 July 2021.
3. Dr Dyson appeared at that hearing and was represented by William Edis QC. The charge she faced was as follows:

*That, being registered in the Register of Veterinary Surgeons, and whilst in practice at the Centre for Equine Studies, Animal Health Trust (AHT), Lanwades Park, Kentford, Newmarket, Suffolk CB8 7UU, [the Respondent]:-*

1(A) *Between 29 November 2018 and 25 December 2018, in relation to a research paper co-authored by you on a project entitled Influence of rider: horse body weight ratios on equine welfare and performance – a pilot study (the project) submitted for publication in the Journal of Veterinary Behaviour: Clinical Applications and Research (the Journal):-*

(i) *on 30 November 2018, informed the editor of the Journal by e-mail that:-*

(a) *there was a former Home Office inspector on the AHT Ethical Committee; and*

(b) *you have obtained informal advice from a 'current inspector' to the effect that there had been no requirement for Home Office approval of the project;*

(ii) *on 15 December 2018, sent an e-mail to a co-author, XX, of the Royal Agricultural University in Cirencester, to the effect that you would forward to the editor of the Journal a letter that you had from a 'friendly inspector';*

(iii) *not proved*

(iv) *on or around 19 December 2018, wrote a letter dated 19 December 2018 purporting to be from a Home Office Inspector by the name of Dr J C Butler DVSc PhD MRCVS, stating that in his/her opinion there had been no requirement for a Home Office licence for the Project;*

(v) *on 15 December 2018, sent to the editor of the Journal the letter you had written in the name of Dr J C Butler dated 19 December 2018;*

(vi) *on 24 December 2018, when sending to the editor of the Journal the letter purporting to be from Dr Butler, stated that Dr Butler had advised*

*you during the planning stage of the Project and that Dr Butler had been abroad recently;*

*1(B) Your conduct in relation to 1(A)(i) to (vi) above, whether individually or in any combination:*

*(i) was misleading; and/or*

*(ii) was dishonest;*

*(iii) risked undermining a government system designed to promote animal welfare and research ethics.*

**And that in relation to the facts alleged you have been guilty of disgraceful conduct in a professional respect.**

4. The original Disciplinary Committee decided that some parts of the hearing would be conducted in private because they related to the health and/or private life of Dr Dyson. At this Restoration Application Dr Dyson was asked if she wished to make a similar request that any personal matters be dealt with in private. Dr Dyson said that she was not making such an application because she was content for all matters to be heard in public, as she considered the private matters to be relevant to her application. Accordingly, this hearing was heard entirely in public and references in this determination to passages from the original hearing, which had been marked as private, are no longer confidential. Dr Dyson indicated that she was content for this approach to be taken and was aware that this meant the public and press would be aware of matters that had previously been kept confidential.
5. The original disciplinary Committee found all the matters alleged proved, save for Particular 1(A)(iii) and, therefore, 1(B) insofar as it related to Particular 1(A)(iii).
6. In concluding that Dr Dyson's behaviour amounted to disgraceful conduct in a professional respect, the original Disciplinary Committee stated:

*“The Committee found Dr Dyson had breached the following parts of the Code:*

*2.1 Veterinary surgeons must be open and honest with clients.*

*6.5 Veterinary surgeons must not engage in any activity or behaviour that would be likely to bring the profession into disrepute or undermine public confidence in the profession.*

*Dr Dyson embarked on a course of dishonest conduct which started with a lie to the editor of the Journal on 30 November 2018 about the presence of a former Home Office Inspector on the AHT Ethical Committee and culminated in the sending of an entirely bogus letter to the Journal, in which she impersonated a Home Office Inspector. This behaviour risked undermining the Government's system designed to promote animal welfare and research ethics. The Committee was satisfied that this fell far below the standard expected of a veterinary surgeon, would be considered deplorable by other members of the profession and the public and clearly amounted to disgraceful conduct.*

*Accordingly, the Committee found the allegation that Dr Dyson was guilty of disgraceful conduct in a professional respect was proved."*

7. The original Disciplinary Committee directed that Dr Dyson's name should be removed from the Register. In its decision on sanction, that Committee noted the following aggravating factors:

- *premeditated misconduct*
- *dishonesty sustained and repeated over a period of time albeit linked to the same issue*
- *impersonating a Government Home Office Inspector*
- *breach of trust*
- *being in an increased position of trust and responsibility given her enhanced status within the profession, as attested by many of her referees and her status as a Fellow of the College*
- *abuse of professional position*

- *blatant and wilful disregard for the systems that regulate the veterinary profession and animal experimentation and are designed to protect and promote the welfare of animals*
- *inadequate insight into the disgraceful conduct*
- *lack of genuine remorse*
- *asking the Head of Operations at the Home Office, a veterinary surgeon, that the matter be “overlooked”*
- *only admitting to having created the fraudulent letter when discovered, despite having had time to reflect upon her actions, including whilst taking a holiday shortly after these incidents and being away from any stresses of her work*

8. The original Disciplinary Committee noted the following mitigating factors:

- *no actual harm or any risk of harm to an animal or human*
- *previous good character*
- *a long, distinguished and unblemished career*
- *a number of significant work and personal pressures which may have impacted upon her behaviour at the relevant time*
- *some early admissions*
- *a significant number of positive references and testimonials*
- *a lifelong commitment to equine welfare and the veterinary profession*

9. In deciding the appropriate sanction, the original Disciplinary Committee stated:

*“The Committee noted that the testimonials provided were universally positive and demonstrated that Dr Dyson had acted completely out of character. The Committee noted that this case was concerned with Dr Dyson's integrity in relation to research rather than any clinical concerns. At no stage had there been any criticism of Dr Dyson's clinical competence and, from the many testimonials, it was clear her outstanding clinical skills were held in extremely high regard.*

*The Committee did, however, have in mind the comments of the Master of the Rolls in the case of Bolton v Law Society [1994] 1 WLR 512, who stated as follows:*

*“Considerations which would normally weigh in mitigation of punishment have less effect on the exercise of this kind of jurisdiction than on the ordinary run of sentences imposed in criminal cases...it often happens that a solicitor appearing before the Tribunal can adduce a wealth of glowing tributes from his professional brethren. He can often show that for him and his family the consequences of striking off and suspension would be little short of tragic. All these matters are relevant and should be considered, but the reputation of the profession is more important than the fortunes of any individual member. Membership of the profession brings many benefits, but that is part of the price.”*

*Thus, whilst the many positive testimonials were relevant, as was the potential impact upon Dr Dyson of a sanction at the top end of the scale, they had to be viewed in light of the comments made by the Judge in the case of Bolton (ibid).*

*The Committee first considered taking no further action. However, the Committee considered public confidence in the profession, and the College as its regulator, would be undermined if no further action were taken in such a serious case.*

*The Committee did not consider this was an appropriate case for judgement to be postponed because there was no requirement to monitor Dr Dyson’s professional conduct over a period of time.*

*The Committee next considered whether to reprimand and/or warn Dr Dyson about her behaviour. The Guidance issued by the College indicates that a reprimand may be appropriate where:*

- (a) The misconduct is at the lower end of the spectrum of seriousness; and*
- (b) There is no future risk to animals or the public; and*
- (c) There is evidence of insight.*

*It was quite clear that the misconduct in this case was at the highest end of the spectrum of seriousness. Mr Edis QC, in his submissions on sanction, conceded that dishonesty was at the highest end of the spectrum of seriousness, although he submitted that the dishonesty in this case was at the lowest level of dishonesty. The Committee emphatically rejected that submission for the reasons given below.*

*In addition, the Committee considered that, as well as the dishonest behaviour, acting in a way that risked undermining a government system designed to promote animal welfare and research ethics was also at the highest end of the spectrum of seriousness. For these reasons alone it would be inappropriate and disproportionate to either reprimand or warn Dr Dyson.*

*Furthermore, Dr Dyson has failed, in the Committee's view, to demonstrate adequate insight into her disgraceful conduct. It was clear from her correspondence with individuals in the months following the discovery of her fraudulent letter that she recognised the seriousness of what she had done in relation to creating the letter and the impact it was having on her. However, she appeared to have limited genuine insight into the wider impact her actions were likely to have on public confidence in veterinary surgeons and the profession as a whole. In addition, the Committee took into account Dr Dyson's failure to demonstrate genuine remorse for her disgraceful conduct.*

*The Committee next considered whether to order that the Registrar suspend Dr Dyson's registration. The Guidance states that suspension may be appropriate where some or all of the following apply:*

- a) The misconduct is serious, but a lesser sanction is inappropriate and the conduct in question falls short of being fundamentally incompatible with remaining on the register;*
- b) The respondent veterinary surgeon has insight into the seriousness of the misconduct and there is no significant risk of repeat behaviour;*
- c) The respondent veterinary surgeon is fit to return to practice (after the period of suspension).*

*There was no doubting the fact that the misconduct in this case was serious and that no lesser sanction would be appropriate. Having been through this disciplinary process, which has been drawn out over two years, the Committee did not believe Dr Dyson would be likely to repeat such disgraceful behaviour. However, the Committee was most concerned by what appeared to be an underlying deep-seated attitudinal problem as demonstrated by Dr Dyson's inadequate insight and lack of genuine remorse. In light of these concerns, together with the seriousness of the misconduct, the Committee concluded that Dr Dyson's conduct could be considered to be fundamentally incompatible with remaining on the register and that suspension may not, therefore, be a sufficient sanction in the public interest.*

*The Committee therefore considered whether removal might be the appropriate sanction in this case.*

*The Committee determined that it was important that a clear message be sent that this sort of behaviour is wholly inappropriate and not to be tolerated. It brings discredit upon Dr Dyson and discredit upon the profession. For whatever reason, Dr Dyson chose not to respond to Ms Overall's email on 30 November 2018 in an honest and straightforward way. Instead she lied about the makeup of the AHT Ethical Committee in order to cloak her response with authority. She also lied about having received advice from a current Inspector for the same reason. In the Committee's view, she made a conscious decision to provide a dishonest response. She no doubt believed that would be the end of the matter. When that did not work, she lied further in the email to Andrew Hemmings, claiming to have a letter from her friendly Inspector. When that too did not work she impersonated a Home Office Inspector in creating the Butler letter. She then added a false declaration to the manuscript, which she subsequently submitted to the Journal along with an email containing yet further lies. That was all done in a blatant and wilful attempt to deceive Ms Overall, the Editor of the Journal, into believing the contents of the correspondence to be true, that confirmation a Home Office Licence was not required had been obtained and all was therefore well with the submitted manuscript. On the evidence she did not need to do any of this. There was no rush, or urgency to have the paper published and the actions were not done in a moment of panic. No doubt she had not planned the entire course of events in advance, but instead reacted to each new obstacle that*



*came her way, but her over-all course of dishonest conduct spanned over three weeks. In such circumstances the Committee did not accept Mr Edis QC's submission that this deliberate course of dishonest conduct, whatever the mitigation, was at the lowest end of the spectrum of dishonesty.*

*The Committee was cognisant of the importance of a veterinary surgeon's signature on any document. This should have been obvious to someone of Dr Dyson's experience. In addition, it was clear from the evidence and all the testimonials, that Dr Dyson has significant standing within the profession, and the research and equine communities. Her conduct, therefore, had added influence and hence the importance of her leading by example in acting with integrity and honesty.*

*The Committee was well aware of the impact and ramifications for Dr Dyson of any decision to remove her from the register, but had to weigh her interests with those of the public. In doing so it took account of the context and circumstances of the case, all matters of personal mitigation, as detailed above, Dr Dyson's undoubted distinguished international career and reputation and the need to act proportionally. However, for all the reasons given above, the Committee was of the view that the need to uphold proper standards of conduct within the veterinary profession, together with the public interest in maintaining confidence in the profession of veterinary surgeons, meant that a period of suspension would not be sufficient and that the only appropriate and proportionate sanction in all the circumstances of this case was that of removal from the Register.*

*The Order of this Committee is, therefore, to direct the Registrar to remove Dr Dyson's name from the Register."*

## **Background**

10. Dr Dyson qualified as a veterinary surgeon in 1980 and went on to specialise in equine orthopaedics, establishing a very considerable reputation in the field (the original Disciplinary Committee described Dr Dyson as 'highly qualified' and 'highly respected'). At the relevant time Dr Dyson was the Head of Clinical Orthopaedics at the Animal Health Trust ("AHT"). On 25 May 2016, Dr Dyson submitted an application to the AHT's Clinical

Research Ethics Committee for authorisation to undertake clinical research and to secure ethical approval for a research project, with the title '*Influence of rider: horse body weight ratios on equine welfare and performance – a pilot study.*' In the AHT application Dr Dyson described herself as the Lead Investigator and appeared as first in the authorship order. The start date of the project was to be the Spring/Summer of 2017 and it would involve one week of data collection and six months of data analysis.

11. Some research projects involving animals are required to be licensed by the Home Office, in accordance with the provisions of the Animals (Scientific Procedures) Act 1986 ("ASPA"). The purpose of the Act is to protect animals used for experimental or other scientific purposes. The Act provides for the appointment of inspectors by the Secretary of State, whose duty is (amongst other things) to 'advise the Secretary of State on applications for licences under this Act'. Although this was important contextual evidence, the case was not about whether or not a licence should in fact have been obtained for the particular research project, but about the actions taken by Dr Dyson linked to the project.
12. Ethical approval was given at the meeting of the Clinical Research Ethics Committee on 2 June 2016. Dr Vaudin, CEO at AHT, explained that, whilst the Clinical Research Ethics Committee can make its own recommendation that a Home Office Inspector should be consulted, projects with an experimental element go to the Animal Welfare and Ethical Review body for consideration as to whether or not an ASPA licence is required. This project was not seen as including an experimental element and the Clinical Research Ethics Committee did not, therefore, advise that the matter be referred to an Inspector.
13. The project, referred to as 'Cheryl's intern project', was then conducted over the following months and although it was initially anticipated it would take in the region of six months, in fact it took until Autumn 2018 to complete. Prior to publication a paper must first be peer reviewed and thus, in October 2018, the relevant paper was sent by Karen Overall, the editor of the Journal, to Dr Matthew Parker, Senior Lecturer in Behavioural Pharmacology and Neuroscience at the University of Portsmouth, a board member at the Journal. Dr Parker outlined how the reviewer has four options once they have read the paper. They may: accept with no change; return to the authors asking them to revise and re-submit with minor corrections; the same but with major corrections; or they may reject the paper.

14. Dr Parker selected the third option, revise and re-submit with major corrections. His reason for this was because he was concerned by the lack of a Home Office licence. He asked the authors to clarify, *inter alia*, whether the study was carried out under project and personal licence from the UK Home Office and, if it was not, the grounds on which the team felt that the study was exempt from ASPA. In a note to Karen Overall, the Journal's editor, Dr Parker said, "*I am deeply concerned that this study was carried out outside UK law. Any project in which the animal is subjected to a procedure (for the purposes of research) that is likely to cause pain, discomfort or lasting harm, needs to be licensed by the UK authorities. There is no evidence that this has been granted in this study. I should like reassurance after which I would be prepared to re-review.*"
15. On 21 November 2018, Karen Overall sent Dr Parker's comments to Andrew Hemmings, one of the co-authors of the paper. She said, "*One reviewer has raised an ethical concern that requires that we reject this ms [manuscript] until the reviewer's query about approval and methodology is addressed. If you can adequately address this, please resubmit this paper (it will get a new number) and ensure all needed info is in the cover letter and ms.*"
16. On 30 November 2018, Dr Parker received an e-mail from Karen Overall. It was addressed to Matt (Dr Parker) and Maggie (Maggie Lloyd, the named veterinary surgeon for the University of Portsmouth, to whom Dr Parker had spoken about his concerns). It was in the following terms:-
- "Hi Maggie and Matt: And here is the answer we needed. If I am not mistaken, Maggie, we can now move forward with this paper. Is that correct? I cannot thank you both enough for your efforts. My sense is that we need to capture a very short version of part of this for the author's ethical statement. I welcome opinions/suggestions. Best – Karen."*
17. The phrase "*and here is the answer we needed*" referred to the message in the e-mail chain below, which was a message from Dr Dyson to Ms Overall of the same date, in the following terms:

*"Thank you for your advice and the efforts to which you have gone to clarify the situation. It is much appreciated. I agree that it is a potentially grey area and we foresaw this from the outset and I had therefore sought advice.*

*We have a former Home Office Inspector on our AHT Ethical Committee and two current licence holders (named Veterinary Surgeons) who are fully conversant with the current legislation. I also sought informal advice from a current Inspector. All were fully aware of the protocols to be employed and gave me assurance that in their opinion Home Office approval would not be required. They were completely satisfied that the abandonment protocols were satisfactory, so that equine welfare would not be compromised. The exercise programme undertaken by the horses was less rigorous than their normal daily work. Daily monitoring of horse rectal temperatures is routinely done by many competition and livery yards as a potential means of detecting early signs of medical problems. On this basis I was therefore advised that the procedure was an acceptable part of the protocol, particularly because the acquisition of rectal temperatures did not exceed the threshold laid down by the UK Animals (Scientific Procedures) Act."*

18. On the same day, namely 30 November 2018, Ms Overall sent an email to Dr Dyson in response to her email cited above. Ms Overall said:

*"Hi Sue – I sent your response to the consultant and reviewer and the consensus is that it would be best for everyone – including the Journal – if you could get a letter from the Home Office and add that this was provided to your ethical statement. There are a range of opinions involved here, but we want absolutely no hint of concerns for anyone that any law has been broken or taken to be trivial. Here is what the consultant recommended: 'I would suggest that they may like to ask the current inspector that they consulted to put their advice in writing, then this can be included in the manuscript. This just makes sense to me and will protect you and us.'"*

19. On 15 December 2018, Dr Dyson sent an email to Andrew Hemmings, co-author of the paper, asking:

*“Can you send me a copy of the submitted version of the paper so that I can add a comment re the Home Office & forward it to Karen together with the letter from my friendly Inspector.”*

20. Two days later, on 17 December 2018, there was a meeting of the Equine Research Group (“ERG”) at the AHT. Dr Dyson attended that meeting, as did the witnesses Dr Hollis, Ms Tranquille, Dr Quiney and Ms Breingan. Ms Tranquille was responsible for preparing the Minutes of the meeting. The typed Minutes state:

*“A reviewer felt that a Home Office Licence was necessary due to taking rectal temperatures however SJD has an unofficial letter from a contact within the Home Office who indicated that a licence would not be necessary for taking rectal temperatures as this is a procedure carried out in the normal day to day routine. The editor will expedite the review process once an unofficial letter has been received.”*

21. At that meeting Dr Hollis recalled Dr Dyson saying words to the effect of:

*“You will never believe this. A reviewer has come back saying that it might need a Home Office Licence. I don’t think it does and I have spoken to a Home Office Inspector and have a letter saying that it does not need a Licence. I am going to send the letter to the Journal and the editor will expedite the review process once she has it.”*

22. Dr Hollis said it was clear from what Dr Dyson told the meeting that she had obtained an informal letter from a Home Office Inspector saying that the study did not need a Licence and that she would be sending the letter to the journal.

23. Ms Quiney was also present at that meeting on 17 December 2018. When making her statement for the proceedings in June 2020, she stated she could not recall exactly what was said, at the Meeting, but that she believed the Minutes accurately reflected *“exactly what was said”*.

24. On 24 December 2018, Dr Dyson sent an email to Ms Overall stating:

*“Sorry for the delay in getting back to you. Dr Butler was abroad when I got back from the AAEP [American Association of Equine Practitioners (Annual Convention)]. Please find attached a letter from Dr Butler, the Home Office Inspector who advised me during the planning phase of the rider weight study. As requested I have added a comment to the manuscript, also attached. I hope that we can proceed now.”*

25. The comment Dr Dyson had added to the manuscript was as follows:

*“This study was approved by the Clinical Ethical Review Committee of the Animal Health Trust (AHT 28 2016); a United Kingdom Home Office Licence was not required.”*

26. The letter Dr Dyson attached to her email was addressed to *“To whom it may concern”* and read as follows:

*“I am writing to confirm that my advice was sought, in my position as a Home Office Inspector for the UK Animals (Scientific Procedures) Act, concerning the rider weight project coordinated by Dr Sue Dyson of the Animal Health Trust. It was my opinion that a Home Office Licence was not required, based on detailed assessment of the protocols, together with the practices which are undertaken for the purposes of recognised animal husbandry, the thresholds laid down by the UK Animals (Scientific Procedures) Act, and the Animal Welfare Act.”*

27. The letter had a private home address at the top, was dated 19 December 2018 and had a signature in a cursive font. Printed below the signature was: Dr J.C. Butler, DVSc, PhD, MRCVS.

28. Ms Overall forwarded Dr Dyson’s email and attachments to Dr Parker, the reviewer who had initiated this sequence of events. She said:

*“The authors of the above-referenced paper have obtained, after a delay due to a meeting (the authors) and a holiday (the letter writer) the required documentation. It is attached with the ms indicating that the project did not require Home Office approval.*

*I'd appreciate it if you can now review this paper."*

29. Dr Parker, however, did not review the paper. Instead he made inquiries as to the identity of Dr Butler. Those inquiries resulted in him contacting Dr Martin Whiting, Head of Operations at the Animals in Science Regulation Unit of the Home Office, and sending Dr Whiting the manuscript and the Dr Butler letter by way of an e-mail dated 10 January 2018.

30. On 10 February 2019, Ms Overall wrote an email to Dr Whiting at the Home Office, stating:

*"I know one of our editorial board members, Matt Parker, has contacted you about the paper ... . I need to ensure that (a) that this research is in violation of no ethical and legal guidelines and (b) that I can give the authors an update as to the paper's status. If you would let me know where you stand with this matter, and whether you need any of my correspondence with the authors, I would appreciate it."*

31. Dr Whiting responded to Karen Overall's message on 20 February 2019, stating:

*"The Home Office has no record of employing Dr J C Butler as an Inspector under the Animals (Scientific Procedures) Act. We are in the process of making further inquiries regarding this matter so that we can understand in what capacity they gave advice to your journal or the authors."*

32. Dr Whiting's response was forwarded to Dr Dyson who, on 24 February 2019, sent an email to Dr Whiting. She detailed the study they had carried out and that they did not believe the procedures they had adopted were above the threshold for regulation under ASPA. She said, *"However, this was questioned by peer reviewers, specifically the acquisition of saliva samples and measuring rectal temperature."* She then added:

*"I do not know what drove me to send Dr J Butler's letter. It is a decision that I will eternally regret. I am an inherently honest person and I have questioned this every day."*

*I was under a huge amount of pressure. I had cared for two elderly parents who had died in fairly quick succession. My husband had been diagnosed with ventricular tachycardia. One of our dogs had to be humanely destroyed. My brother had left his wife and daughters to live with another lady. Work pressure was enormous, with huge economic targets for the clinic, and a somewhat uncertain future. A senior clinician had announced that she was pregnant and would be on maternity leave for a year, for the fourth time. A junior clinician resigned, having been offered a great job opportunity. I can only claim temporary insanity, based on mitigating circumstances, because that is how it seemed.*

*Obviously, when the journal questioned whether Home Office approval was required, we should have contacted you immediately. I do not know why, as co-leader of the team, we failed to do this. The rest of the team had been as astonished as I was that it was considered that Home Office approval might be needed. We consulted various experts who worked in the investigators' institutions who were in agreement that they did not consider that a Home Office licence was required because the planned work was not considered to be above the threshold for regulation under the Animal (Scientific Procedures) Act. This is, however, no excuse. I am fully aware that I acted completely inappropriately. My normal logical, careful, rational, self who works strictly by the rule book, taking no risks, seemed to have temporarily disappeared. I realise that what I did could bring the Animal Health Trust and the members of our team into disrepute. The extra pressure that I have felt as a consequence is overwhelming. I humbly ask that this act of madness could be overlooked."*

33. The same day, Dr Dyson sent an email to Ms Overall stating:

*"We will officially withdraw the letter & seek formal H/O approval."*

34. On 1 March 2019, Dr Dyson wrote a letter to Mr Reynolds, Head of the Animals in Science Regulation Unit at the Home Office, in which she said:

*"In a moment of complete madness I wrote the letter purportedly from Dr Butler, which has subsequently been officially withdrawn. I realise the enormity and seriousness of the offence. It was 100% out of character. I had three successive days in my life at this*



*time when I seemed completely out of control of my life and what I was doing. It was a terrifying experience. I could not understand what I was doing and why. I am ashamed beyond belief by what I did and have suffered extreme mental torment as a result.”*

35. In a letter dated 18 March 2019, Mr Reynolds registered a complaint with the RCVS about Dr Dyson’s alleged behaviour. The College notified Dr Dyson of the complaint by letter dated 23 April 2019.

36. On 24 April 2019, Mr Vaudin received a telephone call from Mr Reynolds, Head of ASRU. Mr Reynolds began the conversation by saying to Mr Vaudin that he probably knew what he was telephoning about with regard to Dr Dyson. Mr Vaudin did not know the reason Mr Reynolds was alluding to. Mr Reynolds said he thought Dr Dyson would have contacted Mr Vaudin by now and went on to explain that Dr Dyson had attempted to deceive a Journal as to the permissibility of work undertaken on a project and had also made false representations of a Home office ASRU Inspector. Dr Vaudin arranged to have an immediate meeting with Dr Dyson. Recorded in the Minutes, as signed by Dr Dyson, it stated, *“Sue then mentioned that a reviewer of her paper for the Journal had contacted her with regard to the Home Office approval and whether the project required an ASPA licence. Sue then admitted she had forwarded a fraudulent letter to the reviewer which she had written herself impersonating a fictitious HO inspector.”* The Minutes went on to say Dr Dyson stated, *“‘It was all like a fog’ and she didn’t understand or know why she wrote the letter.”* And *“Again she stated that ‘she didn’t know why she wrote the letter.’”*

37. In correspondence sent to Tim Phillips, a personal friend, former AHT colleague and now consultant at the Veterinary Defence Society, dated 27 April 2019, Dr Dyson said how she was in a *“very very deep hole and need help and advice. I have done something awful while in a complete mental fog. I fraudulently wrote a letter.”* Dr Dyson went on to give the background to the matter and the pressures she was under, before saying:

*“In complete madness, driven by I do not know what, I fraudulently wrote a letter purporting to be from a Home Office Inspector and sent the letter to the Journal of Veterinary Behaviour: Applied Clinical Research and then blanked those days out. In sending the letter I misled my co-authors and the journal. I am fully aware that I acted completely inappropriately. I did it alone.”*

38. She went on to describe being in a “*complete mental fog*.” She spoke of “*extreme remorse, guilt and regret*” for what she had done. She said that she felt “*sadness and embarrassment*” for having let her colleagues and the profession down, adding “*I am guilty of false certification on a single occasion*.” She also said “*I acted completely out of character. In a moment of complete madness, I fraudulently wrote a letter, which has subsequently been withdrawn*.” She said, “*I am fully aware of the enormity of my crime and the potential consequences. I have enormous regrets and to this day cannot understand what led me to it. I believe that I am an inherently honest person*.” She added, “*After this my mind blocked out completely what I had done. I am ashamed beyond belief by what I did and have suffered extreme mental torment as a result*.”

39. On 29 May 2019, Dr Dyson replied to the College’s letter notifying her of the complaint. She said she “*wanted to put on record as soon as possible my unreserved acceptance that the letter I wrote dated 19th December 2018 was dishonest and should not have been written*.” She went on to say:

*“Around that time I spent several days in a very dark place, with fatigue, waves of personal family history swimming over me, dire thoughts about the future, and my mind seemingly out of control. I recognise now that this is what brought about this unique response on my part and that over-work and extreme stress were the cause.*

*In sending the letter I misled my co-authors and the journal. I am fully aware that I acted completely inappropriately. I did it alone. I wish to make it absolutely clear that my coinvestigators were not involved. My normal logic, careful, rational self, who works strictly by the rule book, taking no risks, seems to have temporarily disappeared.”*

40. Dr Dyson concluded by saying, “*I feel extreme remorse, guilt and regret for what happened when I was enveloped in a mental fog, an experience which I hope that I will never have to endure again. I am sad and embarrassed that I have let my colleagues and the profession down*.”

#### **Dr Dyson’s case**

41. Dr Dyson provided written statements dated 11 February 2020, 30 October 2020, 10 November 2020 and 11 June 2021. She also provided oral evidence to the original Disciplinary Committee, during which she confirmed the content of her statements.
42. She admitted that she submitted the aforementioned research paper for publication in the 'Journal of Veterinary Behaviour' (1(A)). She admitted that she had sent an email on 30 November 2018 to the editor of the Journal stating there had been a former Home Office Inspector on the AHT's Ethical Committee (1(A)(i)(a)) and that she had obtained informal advice from a 'current inspector' to the effect that there had been no requirement for Home Office approval for the project (1(A)(i)(b)). She admitted that she wrote the letter dated 19 December 2018 purporting to be from a Home Office Inspector (1(A)(iv)). She admitted that she sent that letter to the editor of the Journal (1(A)(v)) and that when sending the letter she advised the editor of the Journal that Dr Butler had advised her during the planning stage of the project and that Dr Butler had been abroad recently (1(A)(vi)).
43. Dr Dyson admitted that her actions in 1(A)(i)(a) and 1(A)(iv), (v) and (vi) were misleading, but not that she had intentionally set out to mislead (1(B)(i)). She also admitted that her behaviour in 1(A)(iv), (v) and (vi) risked undermining a government system designed to promote animal welfare and research ethics (1(B)(iii)).
44. Dr Dyson denied sending an email on 15 December 2018 to a co-author, Andrew Hemmings, to the effect that she would forward to the editor of the Journal a letter that she had from a 'friendly inspector' (1(A)(ii)). She said that the reference in the email to "*the letter from my friendly inspector*" was not to a letter she already had, but rather to one she hoped to obtain in the event that she was able to identify and locate the Home Office Inspector she said she had spoken to in 2016 at a reception.
45. Dr Dyson denied telling a meeting of the AHT's Equine Research Group on 17 December 2018 that she had an 'unofficial letter' from a contact in the Home Office to the effect that a Home Office Licence had not been required for the project (1(A)(iii)). This Particular was found not proved.

46. Dr Dyson accepted that in acting in the ways she had admitted her actions had been misleading, but denied that she had intentionally set out to mislead. She also denied that her actions were dishonest. She said:

*“I accept that the letter was misleading and that I must have created it, however I did not have any dishonest intent when doing so. I fully appreciate the importance of regulation of research, and that the fabricated letter could have the effect of undermining the system of such regulation and I deeply regret this. It has been and continues to be a terrible situation. I would never knowingly have done anything to tarnish the reputation of the Animal Health Trust or the veterinary profession. I had strived for years to create a centre of clinical and research excellence. I had nothing to gain personally by writing such a letter, other than to jeopardise my own professional reputation and career.”*

47. Dr Dyson spoke of being “unprecedentedly busy” during this period and detailed her trip to America to speak at two conventions, whilst finalising presentations for an international conference and also spending “considerable time working on comments to reviewers for Paper 1 relating to the rider weight project and finalising Paper 4, communicating with co-authors ...” She also detailed her return to the UK and further events she had to attend. She spoke of being exhausted and feeling under immense pressure professionally. At the same she said she was facing serious family pressures with Christmas looming and that she began to “experience a period of profound grief for the deaths of my parents, whom I had never really previously grieved for.” In addition, her husband was unwell and with all that was going on she felt unable to concentrate in her normal way. She then said:

*“It was in this period of fatigue and profound grief that I accept that I wrote a letter to the Journal of Veterinary Behaviour purportedly from a Home Office Inspector. I have absolutely no recollection of doing this, but I accept that I must have done so. I now realise that I used a real address, the former address of a previous long-term imaging technician at the AHT and co-author of Clinical Radiology of the Horse. I have absolutely no recall of this. This address is in my address book. I do not know the date on which I wrote this letter. I am aware that it is dated 19 December 2018, but I do not know if it was created on that date.”*

48. Of the email sent to Karen Overall, Dr Dyson said:

*“I also have no recollection of writing the email dated 24 December 2018 to Karen Overall, the editor of Veterinary Behaviour, to which the letter was attached or to making any amendment to the ethical approval statement included on the paper attached to that email. I accept however that I must have written the email and made the amendment to the ethical approval statement. Although I have seen a copy of an email dated 28 December 2018 from Karen Overall to me in the Inquiry Bundle, responding to my email dated 24 December 2018, I have no recollection of receiving this.”*

49. She added:

*“I do not believe for one moment that had I been in my normal, logical, rational state of mind that I would have written this letter. It made no sense to do it. It would have been dishonest to do so, and I do not believe that I would do this.”*

50. In her fourth statement provided for the original hearing, dated 11 June 2021, Dr Dyson said of the “Dr Butler” letter:

*“I have always accepted, including to the Royal College, that the letter was "dishonest", indeed I do not see how it could be called anything else. It says things that are not true and appears to be written by someone who in fact does not exist. Equally, I have always accepted that it should not have been written and sent.”*

51. She went on to say that she had no recollection of writing the ‘Dr Butler’ letter, or sending it, or of composing the accompanying email, although she accepted that she must have done all those things. She added:

*“I fully accept however, that simply because I have no recollection of writing the letter at all, this does not of itself show that I was not in fact acting dishonestly when I wrote it. I recognise that it is logically possible to act dishonestly and not remember*

*it. But although I have never had any such recollection, I have never been able to believe that I wrote that letter with a dishonest intent or deliberately to mislead.”*

52. Dr Dyson went on to list many factors which, she considered supported her belief that she could not have acted dishonestly. They included: a belief that she is an honest and fair-minded person; that she cherishes her reputation; that she has had a lifelong commitment to honest clinical practice and ethical research; that she is risk averse and so would not knowingly do something so illogical and dangerous; that she has devoted her professional life to the AHT and would not knowingly do anything to damage its reputation; that she had no reason to dishonestly invent a Home Office inspector since her reputation in the field would not have been significantly added to by the publication of this paper, nor would her career have been advanced; that there would have been no financial ramifications for her, the other authors or the AHT had the paper been withdrawn; and she believed they could in any event have applied for a retrospective licence, which she believed would have been granted.

53. Dr Dyson added:

*“Nevertheless, during the early stages of this case I was faced with the undeniable fact that a dishonest letter had been written by me and sent under cover of an e-mail that also contained untruths. As I could not remember writing them, I obviously could not remember my intentions at the time, and I found it impossible to reconcile the fact of the letter with my knowledge of myself and the surrounding circumstances. When learning of the letter I was deeply shocked and distraught. I could not understand how I could possibly have written such a letter, a situation which was in itself extremely frightening. I was immobilised by fear, embarrassment and shame. It was only when, several months later, I sought counselling for my ongoing distress that I began to be aware that there may be a psychological explanation for these seemingly reconcilable facts, in other words an explanation of how I could have written the letter without at the time being dishonest or having any intention to mislead.”*

54. Dr Dyson said it was for this reason that Dr Joseph was approached to give an opinion on the issue.

55. Dr Philip Joseph is a Consultant Psychiatrist. He provided an expert report dated 8 February 2020. He provided his opinion following a two-hour interview with Dr Dyson on 4 February 2020. He summarised the background to the case and the issues in Dr Dyson's life at the relevant time and then provided the following opinion:

*“Dr Dyson does not suffer from any form of mental disorder. Her personality has been shaped by developmental factors in childhood and I have formed the view that she has experienced difficulty in expressing her emotions and confiding in others. She is an ambitious, driven, perfectionist, with some rigidity in her personality, but generally in her life this has not caused her problems, she has thrived on stress, which has probably proved beneficial to her career. However, such a personality structure can be inflexible, leading to a severe, potentially catastrophic reaction when emotions become too intense to manage.*

*Dr Dyson has identified the stresses she was experiencing in the period prior to and including December 2018, particularly family stresses and the outpouring of delayed grief associated with the death of her parents. It appears that her subsequent actions, which form the basis of the allegations she is facing, were out of character. She claims amnesia for the writing and sending of the fabricated email. Whilst it is not for the psychiatrist to determine whether the claimed amnesia is genuine or not in this particular case, I can inform the Tribunal that genuine amnesia can occur at the time of acute stress and can cover a period of hours or even days. The amnesia for that period of time can then persist indefinitely with no recovery of the memory, similar to memory loss following concussion.*

*In Dr Dyson's case there does not appear to be any discernible organic cause for her amnesia, however I note that she has suffered periods of concussion after falls from her horse, which may have some bearing on the issue, although there is no brain scan which might show any residual damage or scarring to the brain.*

*Assuming that there is no organic basis for the amnesia, then the psychological mechanism of dissociation is a well-established form of stress induced amnesia. This is particularly likely to occur in those individuals, who are usually well in control of their emotions, but who, if they suffer an overwhelming experience of emotion, react by splitting off, or dissociating the mind, from their normal conscious awareness. Dr Dyson has given me an account of events which is consistent with an episode of dissociative amnesia and if correct, then this would suggest she was experiencing a significant impairment in her ability to think clearly and logically, at the time she wrote the email.*

*Having read all the material in this case, it is unclear whether Dr Dyson expressly acknowledges that she has a memory of sending the letter, when she was first challenged on the issue in mid-February 2019. She comments that she does not know what drove her to do it and recognises that she acted inappropriately. In late May 2019 she states that she does not remember sending it. If the Tribunal concludes that Dr Dyson does have a memory of writing and submitting the letter to the journal's editor, it may still be the case, due to the stress she was experiencing at the time, that Dr Dyson did not appreciate that what she was doing would be considered dishonest by the standards of ordinary people. I cannot say how likely this is, but this lack of appreciation can occur when the mind's normal functioning is impaired by severe stress. I conclude therefore that there is at least a possibility, that when creating and sending the letter, Dr Dyson did not form an intention to deceive."*

56. In response the College relied on the expert opinion evidence of Consultant Psychiatrist Dr Richard Taylor, who provided a report dated 28 September 2020, based on an interview with Dr Dyson, for approximately two hours, on 22 June 2020. Dr Taylor opined:

*"On the basis of her account it is possible that Dr Dyson was in a state of social and psychological stress in the context of a series of life events in the week before Christmas. This is likely to have occurred against the background of a somewhat rigid perfectionist and controlled personality with limited ability to communicate or resolve psychological stress. Dr Dyson's description, however is rather non-specific as per the written evidence in the bundle and at interview as stated above: a huge*



*amount of pressure ; mental fog ; temporary insanity ; complete madness ; my mind seemingly out of control . At interview she gave the following description, She said that she recalls feeling that she was under huge stress professionally and that it was one thing after another . She said that in the week before Christmas she said she felt she had begun to dissolve . She said that she had a strange feeling of being over-taken by the various stressful life events. She said that she felt tearful and emotional. Regarding sleep she said that she habitually has a strange sleep pattern and is always an early riser, but she felt that she had been waking up earlier and earlier and would wake up at 2 am worrying about things. She felt increasingly exhausted and fatigued.*

*In my opinion there was no active major mental illness at the material time capable of altering her appreciation of dishonesty.*

*Although not a matter for psychiatric opinion, it is reasonable to conclude in my opinion that with reference to Dr Dyson s CV and her distinguished career that her actions in producing the letter do appear to be out of character . Although I do not think that her appreciation of dishonesty was in any way impaired by her mental state it is possible that stressful circumstances may have had some effect, albeit relatively minor, on her rational consideration of the potential adverse consequences of her dishonest actions in the longer term although I do not think she lacked the capacity to appreciate these consequences. Thus in my opinion her mental state may provide some mitigation for her actions while not explaining them in terms of a reaction to stress.*

*Regarding the amnesia for writing the letter it is important to note that this issue relates to Dr Dyson s recollection of the writing of the letter afterwards and not her mental state at the material time i.e. the time of writing it.*

*In my opinion although Dr Dyson has suffered a number of head injuries there is no evidence of any organic brain damage resulting from head injury or any cause. At interview she has an intact screening test for cognition.*

*An alternative explanation for the amnesia would be dissociation. This is essentially a stress-induced amnesia that is brought about by an unconscious process often in the context of highly stressful events. I cannot say for certain whether dissociation explains the amnesia however I cannot exclude it as a possibility. I note that Dr Dyson has stated, In complete madness driven by I do not know what I fraudulently wrote a letter purporting to be from a Home Office inspector and then blanked those days out.*

*It is not possible as a psychiatrist to determine the extent to which Dr Dyson is either unable or unwilling to recall the events around writing the letter. In other words I cannot assist as to whether Dr Dyson is dishonest with regards to her reported amnesia i.e. making a conscious decision not to recall versus an unconscious stress related dissociation from memory of the events. However, given the stress she was under I am unable to exclude the possibility that the amnesia may represent unconscious dissociation.*

*Thus I disagree with Dr Joseph in respect of dishonesty but I agree in respect of dissociation or at least I am unable to exclude dissociation as an explanation for Dr Dyson s reported later amnesia after the event.”*

57. Throughout her oral evidence at the original hearing Dr Dyson maintained that she had absolutely no recollection of ever having written the letter or sending the email to Karen Overall, emphasising that she is an inherently honest person and she would never knowingly behave in a dishonest way.

### **Dr Dyson’s evidence at the Restoration Hearing**

58. Dr Dyson provided a letter to the College, dated 12 June 2022, detailing her position, she also provided a skeleton argument supporting her application and provided oral evidence to the Committee. In addition Dr Dyson provided a multitude of references and testimonials that spoke of her in the most positive of terms.

59. In the aforementioned letter sent to the College dated 12 June 2022, Dr Dyson said:

*“I accept the findings of the Disciplinary Hearing (DH) in July 2021 and recognise that the letter I wrote purporting to be from a Home Office Inspector was dishonest, as was my subsequent conduct. To provide context: Dr Mark Vaudin, the Animal Health Trust’s Chief Executive, had explained to the disciplinary hearing in July 2021 that the research project entitled Influence of rider: horse body weight ratios on equine welfare and performance – a pilot study, “was not seen as including an experimental element and the Clinical Research Ethics Committee did not, therefore, advise that the matter be referred to an Inspector”. However, when a paper on the project was submitted for publication, one of the reviewers (Dr Matthew Parker) raised concerns that the study had not been carried out under Home Office licence. I am ashamed to admit that my response to these concerns was to concoct a letter, purportedly from a Home Office Inspector, although I later agreed that no such person existed. However, I have no memory of, and have never had any memory of having any intent to write this letter, or writing such a letter, or sending such a letter. I do however recognise that this was a dishonest act and I am deeply ashamed of it.*

*The question of whether Home Office approval really was needed for this project was not resolved, creating another layer of uncertainty, but one of less significance than the letter and subsequent ramifications. I accept that my behaviour was inexcusable and that honesty must be at the centre of a veterinary surgeon’s life and work and I must never again abuse the power of my professional position as a veterinary surgeon.*

*Professional support and treatment have enabled me to recover from the medically confirmed dissociative disorder which may have contributed to such uncharacteristic and unforgivable behaviour. The improvement in my mental health has helped me to address the issues and face the future.”*

60. Dr Dyson went on to say that in its latter years the AHT had become an increasingly stressful place in which to work but that whatever the background circumstances, composing a letter purporting to be from a Home Office Inspector “*must have been a deliberate act, whether or not I was aware of it, for which there is no excuse; it was reprehensible.*”

61. Dr Dyson said that she “*apologised unreservedly*” and that there was “*absolutely no justification for seeking to impersonate a Home Office Inspector.*” she added that such an act was as inexplicable to her friends and supporters as it was to herself, but that she recognised the letter “*must have been written by me and that this was an appallingly dishonest action and one of which I am deeply ashamed, increasingly so with the insight that has accompanied my slow recovery in general and mental health.*” She added that she could say “*with absolute certainty that no abuse of my professional position will happen again.*”

62. With regard to insight, Dy Dyson said, “*I fully admit that during the Disciplinary Hearing I failed to demonstrate insight. However, as outlined below, I have taken many steps to address this criticism: improving my mental health, considering the sequence of past events and taking remedial action. I can assure the committee that I now have insight into my past actions and understand that dishonesty cannot ever be condoned and that trust and integrity are essential attributes for a veterinary surgeon.*”

63. With reference to remorse, Dr Dyson said:

*“During my interrogation at the Disciplinary Hearing the Committee adjudged that I had failed to express sufficient remorse, but please understand that there were mitigating circumstances. Had the hearing taken place in early 2020, when originally scheduled, I would have been in a much more vulnerable and emotional position and would have been unable to retain the composure which I showed at the hearing in July 2021, except when delivering the ‘in camera’ section.*

*Following the postponement of the original hearing in early 2020 I sought medical advice, I continued with professional counselling, I engaged in meditation through Headspace, and learned breathing exercises. I exercised regularly and continued to control my working hours. As a result of these interventions, the reorganisation of my professional and personal lives, and the tremendous support of professional colleagues, clients and friends I have been able to survive this terrible drawn-out mental ordeal and to reflect on my actions. Despite all the support I received I experienced what was believed to be a stress-induced seizure in mid- April 2020, with*

*a resultant prohibition on driving for six months, and I have been on prophylactic medication ever since.*

*I may have seemed defensive, or perhaps even arrogant, in the face of prolonged intense interrogation, but that was a coping mechanism and certainly not how I felt inside. I was in turmoil and conscience stricken.*

*I had in written submissions before the Disciplinary Hearing repeatedly expressed extreme remorse for my actions to the Home Office, to senior management at the Animal Health Trust and to the Royal College of Veterinary Surgeons.*

*It would be totally contrary to my ethical principles to do anything to bring the veterinary profession, the Royal College of Veterinary Surgeons and the Animal Health Trust into disrepute. I am truly sorry if I failed to reach the high standards to which I aspired and am acutely aware that such actions must never be repeated.”*

64. Dr Dyson said that since the Disciplinary Hearing she had *“reflected long and hard about professional integrity.”* She had also *“diligently tried to support my mental well-being.”* She said she had reflected on the circumstances which led to her misconduct and *“realised the importance of reducing stress, by working shorter hours, setting boundaries, prioritisation, saying ‘no’ more often; thereby giving myself more space to cope with stressful situations, so that professionalism can be maintained at all times.”*

65. She added, *“I have accepted that I was in a vulnerable position and have sought professional guidance through continued counselling. In addition, I have attended a course in Probit and Ethics, which provided excellent guidance. I realise that although I may strive for perfection, and am highly self-critical, perfection is rarely possible all of the time. I have a strong belief in the huge importance of honesty, integrity and probity. I believe that the strategies I have put in place will be successful and minimise the risks of recurrence so that you can have confidence in me for the future.”*

66. With reference to being restored to the Register, Dr Dyson said:

*“As the Disciplinary Hearing recognised, I have never done anything that compromised the welfare of the animals under my care, nor compromised my relationships with clients and professional colleagues. I have a passion for clinical work, and I feel that I still have a lot to offer clients and the profession, but also recognise that as an equine orthopaedic clinician physical strength and well-being, as well as mental capacity, are required to work safely and to the best of my ability. I am therefore anxious to request restoration to the RCVS Register at the earliest possible opportunity as I am now 66 years of age. The testimonials provided on my behalf by clients and referring veterinarians and other professional colleagues demonstrate the esteem in which my professional ability and integrity and communication skills are held.”*

67. Dr Dyson provided details of how she had maintained her clinical skills and knowledge with both her continued research work, teaching and CPD (Continuing Professional Development). She also provided a significant number of positive testimonials from clients and professional colleagues.

68. In her skeleton argument, Dr Dyson stated:

*1. “I accept the Decision of Findings of Fact and Sanction dated the 12th of July 2021, without reservation or qualification.*

*2. I seek to rely on my written application and character testimonials, but in addition seek to argue that the committee ought, properly, to take into consideration the exceptional features of the case namely:*

*a. The circumstances of the accepted disgraceful conduct were an isolated example of misconduct, confined to the specific facts of the case and not part of a longer or protracted pattern of conduct or behaviour.*

*b. The accepted misconduct was not motivated by financial or material gain, or pecuniary advantage of any description whatsoever.*

*c. The welfare of the animals that might be touched or concerned by the*

*misconduct was not at any stage compromised.*

*d. There was no element of sophisticated behaviour suggestive of significant planning or other aggravating feature.*

*3. I contend that the committee ought properly to take into consideration the unique features of personal mitigation, namely*

*a. The nature and extent of reputational harm and damage as a consequence of the findings and sanction.*

*b. The loss of livelihood and pursuit of my lifetime's professional vocation (whilst I am not arguing exceptional financial hardship, the point is that there has been a significant and profound compromise in my earning capacity by reason of the misconduct and sanction, both nationally and internationally). However, I am particularly touched by my inability to offer professional services for the benefit of horses and their owners.*

*c. Not just my previous good character (no previous disciplinary findings etc) rather, my previous exemplary character as illustrated by the content of many testimonials.*

*d. The matters contained within the character testimonials that demonstrate*

- Insight and contrition for the accepted misconduct*
- Genuine remorse*
- An opportunity to reflect, learn and develop as a personality by reason of the proceeding and subsequent sanction*
- A return to the Register would not cause a crisis in confidence of the Committee and its responsibilities*
- The accepted misconduct will remain on my disciplinary record*

*4. I contend that the disciplinary proceedings have served to punish me severely and have also resulted in both reform and rehabilitation. In the exercise of a balancing act in assessing my culpability and the issue of harm inflicted by my actions, it is argued that the point has arrived where I am a fit and proper candidate.*

*5. Whilst I accept that the misconduct was a serious example of its kind and category, and whilst the committee correctly identified a wider public interest in the punishment of such conduct, I contend that any future ongoing risk to the public and animals is extremely low, particularly as the circumstances that led up to the original hearing cannot be replicated.*

*6. Whilst I accept that the circumstances of the case are fact specific and solely to be judged on its unique merits or otherwise, my legal advisor advises me that to prevent any justified sense of grievance, the Committee ought properly to have regard to other cases (it being accepted that the weight to be attached to such analysis is limited, as each case must be judged on its own facts and that there is no directly comparable case that could be regarded as a precedent)*

[There followed a list of nine cases, which are not replicated here as Dr Dyson was later to indicate she no longer relied on them as any sort of comparison.]

*7. By reason of the forgoing, I respectfully ask the committee that in the balancing act to be performed, in an assessment of my culpability and harm set against my mitigation and personal factors, it is in the interests of justice and in the wider public interest to restore me, with my talents and professional skills to the Register.”*

69. In her oral evidence to the Committee, Dr Dyson read out a prepared statement as follows:

*“I have accepted the decisions of the previous Disciplinary Hearing without reservation or qualification and appreciate how serious the charges were. I am truly sorry. I suggest that what happened was an isolated episode, for which I feel*



*extreme remorse, and which was provoked by exceptional professional circumstances relating to the Animal Health Trust and personal circumstances, that are highly unlikely to be replicated.*

*The likelihood of any future dishonest behaviour is remote. I truly believe that the sequence of events is never likely to happen again. Moreover, through counselling and other advice I think that I have acquired new skills and have coping mechanisms in place to protect me.*

*There have never been any other suggestions of dishonest behaviour. My ethos in everything that I have done personally and professionally is to be open, honest and transparent, to describe the facts as they are without concealing anything. This has sometimes meant that clients have had to face unpalatable facts. This has sometimes meant that we have had some struggles with peer reviewers, because we have been open in discussing the flaws or limitations of a study. But I have always felt comfortable with this approach and regard it as a hallmark of how my team of colleagues and I have worked.*

*What happened was not likely to give me any personal gain whatsoever – I was not going to benefit either financially or professionally. I have published more than 370 papers – numbers do not count – what is important is that the results of studies are reported honestly and transparently and that efforts are made to spread the results to professional colleagues in the veterinary and allied professions and where applicable to owners, riders and coaches. I passionately believe in education of the entire equine industry. In the last year much of my focus has been on dissemination of information to the industry, with the primary aim being to improve equine welfare.*

*It is my strong belief that at no time was equine welfare compromised. On the contrary the aim with the rider weight study and other work was to benefit equine welfare and many of the testimonials attest to this. I am passionate about equine welfare, especially that of the ridden horse, and I think that my work with others in the development and verification of the Ridden Horse Pain Ethogram and its subsequent utilisation in the field is now world recognised, demonstrating my commitment to equine welfare.*

*Removal from the Register was very traumatic. I know that I only had myself to blame. However, to be reported in the national press and the international press, the veterinary press worldwide, and across many equine magazines and social media sites was very tough. I am very fortunate that I have had an amazing support network of friends, professional colleagues and clients from all around the world. The effect of their support has been immeasurable. I have been extremely moved and touched to be on the receiving end of such heartfelt tributes to me as a person and as a professional.*

*Although I have been hit financially, it has been much harder not to be able to follow my passion of working with clients and their horses, and not being able to help and support them. My previous clients want me to be restored to the Register, and I would love to be able to help them. So, my request for restoration is not driven financially, but by my passion to want to return to clinical work, and also to mentor young people in the profession.*

*I have had plenty of time to reflect on the sequence of events, to restructure my life and to seek professional guidance. I have learnt from this and have strategies in place to try to minimise being placed in extremely stressful circumstances. I have accepted an extremely tough punishment, but from this experience there have been some positive outcomes for the future of my life.*

*I do not think that further time excluded from the Register will be likely to alter my future conduct, nor be in the best interests of the horse owning public.*

*I strongly believe that by my restoration to the register there is no risk to clients, their horses, or the profession in general. Rather I still have a lot to offer the profession, to owners and to their horses. I believe that in my position, not only as a former veterinarian, but also a lifetime horse rider, that I have particular empathy with equine clients. I understand the problems of the horses and their riders. I believe that I have compassion and integrity and a desire to invest time in them.*

*I think that this comes across very strongly in many of the testimonials that have been written in my support, which I have found completely overwhelming.*

*My passion for lifelong learning has continued and through reading journal articles, reviewing scientific papers, and being involved in research projects and*

*writing them up for peer-reviewed publication, I have continued to expand my knowledge and experience. By the observation of 1,010 dressage tests in 2021 and subsequent review of many video recordings I have been fine-tuning my observational skills. I have been involved in many webinars and live meetings in order to keep up with new developments in the world of equestrianism in general and equine performance related problems as well as in the equine veterinary field.*

*I appreciate that the Disciplinary Committee has to consider each case on its own merits, and that is as it should be. I would hope that fairness should prevail. There is no similar case with which to make direct comparisons. I hope that the committee will be open and fair minded in dealing with my case, taking everything into account.*

*I have been off the register for more than 1 year. In view of the nature of the case I understand the penalty needed to be severe. As I have intimated before, I have found the experience traumatic and harrowing. It has pervaded my life every day and night.*

*I believe that I have served a harsh penalty. I want to be able to help horse owners and their horses, rather than turn them away. I want to be able to help referring veterinary surgeons with my skills as both a horseperson and an experienced equine veterinarian.*

*I am now ready, stronger and wiser, to return to the fray to finish the work that I have started, and to bring all my experience to bear once more for the benefit of the equestrian world. I am here falling at your discretion to give me a second chance, against my most solemn and unreserved undertaking that I can be trusted that such events which occurred will never ever happen again.”*

70. In answer to questions from Mr Bradly QC, Dr Dyson repeated that she unreservedly accepted the findings of the original Disciplinary Committee and that her actions were dishonest. Mr Bradly QC then asked Dr Dyson what she meant by the following passage in her letter to the College sent in June 2022, *“Professional support and treatment have enabled me to recover from the medically confirmed dissociative disorder which may have contributed to such uncharacteristic and unforgivable behaviour.”* Dr Dyson said that what she meant by that was that she was relying on medical advice, which was that *“they believed*

*I was in a dissociative state and therefore could possibly, and probably, acted when not aware of it.*” She added that she was accepting that what happened was dishonest and she was sorry that it happened *“but I was not aware of it happening.”* Mr Bradley QC pointed out that the original Disciplinary Committee found that she had behaved deliberately and asked Dr Dyson if she disagreed with that finding. Dr Dyson replied, *“What I am saying is that I have to accept the medical advice I was given and I accept what I did was dishonest, but it was something about which I knew nothing at the time and know nothing now.”* She denied that this stance was inconsistent with the Committee’s findings.

71. Dr Dyson was then asked to comment on paragraph 113 of the original determination where the Disciplinary Committee stated, *“This whole process bore the hallmarks of careful thought and the Committee determined that Dr Dyson was fully aware of what she was doing throughout the process.”* Dr Dyson said, *“According to the experts, my medical advisers, I was in a dissociative state, so I was dishonest, but I cannot accept I was fully aware of what was happening.”* Dr Dyson maintained this position throughout her questioning, repeatedly saying she accepted she was dishonest whilst saying she accepted what was said to her by her medical advisers.

72. In response to a Committee question about the perception of the profession and the public to her returning to practice after such a short time having been found guilty of such a serious offence, Dr Dyson said, *“Well if the testimonials I have provided are anything to go by, they would think I have paid a stiff penalty and they would welcome me back to the profession.”* Dr Dyson was asked to clarify what her state of knowledge was at the time of committing the various dishonest acts which she now admitted were dishonest and she replied, *“This is what was so difficult the first time round because I was told I had been in a dissociative state so was not aware of what I was doing so I pleaded not guilty, despite accepting that it was a dishonest act. It is a very complex argument which goes round and round in circles. I do not know why I did what I did, I accept I did it and am very ashamed. I have sought professional advice to prevent anything happening again.”* Dr Dyson did not accept that she was conscious of her actions at the time and said she did not have any intent to deceive, but she accepted the decision of the Committee, who found otherwise. She said she could not say when she considered she was in a dissociative state but believed it was in the latter part of December. She was then asked about the reference she made to there being a Home Office Inspector on the AHT Ethical Committee, which the original Disciplinary

Committee found to be dishonest, but she said that was an error and a mistake when she wrote the email.

73. In further questions from Mr Bradley QC (arising out of the Committee questions) Dr Dyson was asked whether she accepted that for each and every dishonest act the original Disciplinary Committee found her to have acted deliberately and knowingly. Dr Dyson replied, *“I accept the Committee’s decision. I made some mistakes, I did not deliberately set out to deceive, but I accept that the Committee’s decision was that I was dishonest.”*

### **Summary of the College’s submissions on the application for restoration to the Register**

74. These are set out fully in the written submissions for the College in respect of this application.

75. In summary, Mr Bradley QC, on behalf of the College, drew the Committee’s attention to the underlying facts relating to the disgraceful conduct in a professional respect and the seriousness of the matters found proved. He said that the College opposed the application by Dr Dyson on the grounds that she is not fit to be restored to the Register in light of her continued lack of insight. Mr Bradley QC submitted for Dr Dyson’s application to succeed her return to the Register must be in the public interest. He said that given the fact that Dr Dyson *“has not developed at all in her thinking about her misconduct it cannot be said that the reputation of the profession and standards within it, or confidence in this regulatory process, can be protected by her return to the Register.”*

### **Summary of the Applicant’s submissions**

76. These are set out fully in the written submissions provided by Dr Dyson in respect of her application.

77. In summary, Dr Dyson maintained that she accepted the findings of the original Disciplinary Committee and that her actions were dishonest and shameful. However, she did not act knowingly as a result of the dissociative state that she was in at the time, saying, *“There is a logical explanation for this completely uncharacteristic behaviour. I was suffering from a mental health disorder.”*

78. She said that she believed she had gained insight into her behaviour and demonstrated “*deep remorse*”. She said, “*My misconduct was extremely serious, and it was appropriate that the Royal College of Veterinary Surgeons imposed severe sanctions. A large body of my peers in the equine veterinary profession and horse-owning clients feel that I have paid a just penalty and are anxious to see me returned to the register, feeling confident in my honesty and trustworthiness. I have a large body of former clients who are desperate for help; they have sought advice for their horses from others in the profession without success. The trauma sustained by owners who lack clarity of a direction of travel with their horses cannot be over-emphasised.*”

79. Dr Dyson asked, “*What risk is there in reinstating me? What benefits are there for my clients and the equine veterinary profession as a whole in reinstating me? I strongly suggest that there is absolutely no risk of bringing the profession into disrepute by my reinstatement.*” Dr Dyson said “*I seek forgiveness from you and humbly ask that I be allowed to return to helping horses and people.*”

80. Dr Dyson read out a selection of the positive comments made by her supportive testimonials and in conclusion stated:

- *I do accept the conclusions of the Disciplinary Hearing*
- *I question the misinterpretation of my current submissions by Mr Bradly*
- *I strongly believe that I have shown contrition, remorse and insight*
- *I have strategies in place so that such events can never happen again*

### **The Committee’s decision**

81. The Committee noted that the burden of proof is on Dr Dyson to satisfy the Committee, on the balance of probabilities, that she is fit to be restored to the Register. The Committee accepted the advice of the Legal Assessor. It took into account all the material provided, the oral evidence of Dr Dyson and the submissions made by both parties.

82. The Committee considered the factors set out in the Disciplinary Committee's Procedure Guidance in exercising its judgement and in deciding if Dr Dyson was fit to be restored to the Register, namely:

- a. acceptance by the Applicant veterinary surgeon of the findings of the Committee at the original inquiry hearing;
- b. the seriousness of those findings;
- c. the protection of the public;
- d. the future of the welfare of animals in the event of the Applicant veterinary surgeon being permitted to have his or her name restored to the Register;
- e. the length of time off the Register;
- f. the Applicant veterinary surgeon's conduct since removal from the Register;
- g. efforts by the Applicant veterinary surgeon to keep up to date in terms of knowledge, skills and developments in practice, since removal from the Register (accepting that he or she must not practise as a veterinary surgeon);
- h. the impact on the Applicant veterinary surgeon of having his or her name removed from the Register; and,
- i. the public support for the applicant veterinary surgeon.

(a) Acceptance by the Applicant veterinary surgeon of the findings of the Committee at the original inquiry hearing

83. Dr Dyson repeatedly said that she accepted the findings of the Committee at the original inquiry hearing. However, the Committee was particularly concerned about the level of insight shown by Dr Dyson and whether she truly accepted that she had acted dishonestly. In her application for restoration she said "*I accept the findings of the Disciplinary Hearing (DH) in July 2021.*" In her skeleton argument she said "*I accept the Decision of Findings of Fact and Sanction dated the 12th of July 2021, without reservation or qualification.*" In her oral evidence she said "*I have accepted the decisions of the previous Disciplinary Hearing without reservation or qualification and appreciate how serious the charges were.*" She repeated that answer to questions from Mr Bradley QC. However, she did then add qualification by maintaining her account that, according to medical advice, she was suffering from a dissociative state at the time and so did not know what she was doing. That account

was emphatically rejected by the original Disciplinary Committee, who concluded that she had acted both deliberately and knowingly throughout the three weeks of her prevailing dishonest conduct.

84. Dr Dyson repeatedly alluded to the medical advice she received and that, according to that advice, she was in a dissociative state and so not aware of what she was doing. In her closing submissions she even referred to her “diagnosed” mental health condition. The Committee noted that there was no formal diagnosis of her having been in a dissociative state, either at the original hearing or before this Committee. The medical evidence at the original hearing taken at its highest was that it was only a possibility she may have suffered a period of dissociative amnesia and furthermore it was only referring to the period when the letter was written and sent. That was around 19-24 December 2018 and in her evidence to this Committee Dr Dyson said she believed she was in a dissociative state in the “*latter part of December*”. So even if the original Disciplinary Committee had not rejected her explanation, her ‘defence’ (since that is what it would have amounted to) would not have covered the dishonest acts that occurred between 30 November and 19 December, a period of some 20 days.

85. Dr Dyson also referred to it being an isolated episode when in fact there were up to seven separate and distinct dishonest acts committed over a three-week period. Furthermore, the Committee could not go behind the findings of the original Disciplinary Committee that rejected her account, saying, “*This whole process bore the hallmarks of careful thought and the Committee determined that Dr Dyson was fully aware of what she was doing throughout the process.*”

86. As detailed above, the original Disciplinary Committee summed up its findings thus:

*“For whatever reason, Dr Dyson chose not to respond to Ms Overall’s email on 30 November 2018 in an honest and straightforward way. Instead she lied about the makeup of the AHT Ethical Committee in order to cloak her response with authority. She also lied about having received advice from a current Inspector for the same reason. In the Committee’s view, she made a conscious decision to provide a dishonest response. She no doubt believed that would be the end of the matter. When that did not work, she lied further in the email to Andrew Hemmings,*



*claiming to have a letter from her friendly Inspector. When that too did not work she impersonated a Home Office Inspector in creating the Butler letter. She then added a false declaration to the manuscript, which she subsequently submitted to the Journal along with an email containing yet further lies. That was all done in a blatant and wilful attempt to deceive Ms Overall, the Editor of the Journal, into believing the contents of the correspondence to be true, that confirmation a Home Office Licence was not required had been obtained and all was therefore well with the submitted manuscript.”*

87. Whilst Dr Dyson repeatedly said she accepted the findings of the original Disciplinary Committee and that her actions had been dishonest, the Committee was not persuaded that she was in fact now accepting she had acted dishonestly. This was because she continued to maintain that some of her actions were “*mistakes or errors*”, some had been “*misinterpreted*” by the original Disciplinary Committee and others occurred whilst she was “*in a dissociative state and unaware of her actions*”. She never once accepted that she had deliberately and knowingly set out to deceive others by her actions at any stage during the three weeks of deceit (which was the finding of the original Disciplinary Committee.) The overall impression given by Dr Dyson was that her acceptance that her actions were dishonest was not genuine, but rather said in an attempt to persuade the Committee that she did have insight into her conduct and should be allowed to be returned to the Register. She said she accepted the findings of the original Disciplinary Committee, but not the Committee’s finding that she was deliberately and knowingly dishonest.

88. The Committee considered that Dr Dyson’s reliance on what she termed the medical advice that she was in a dissociative state allowed her to say she accepted the findings of the Committee and was able to admit that her actions were dishonest, without in fact genuinely admitting guilt at all. The Committee considered that this provided a justification in her mind for her undoubted uncharacteristic behaviour. That she has a significant number of eminent professional colleagues and clients in the equine world who think very highly of her and fully support her is self-evident from the many glowing references provided. However, they do not deal with the core issue, namely Dr Dyson’s unwillingness to take genuine responsibility for her dishonest behaviour over that three week period, thereby demonstrating a lack of insight into her disgraceful conduct.

89. This lack of insight also impacted upon her many expressions of remorse. She repeatedly told the Committee how sorry she was and how ashamed she was. However, without taking genuine responsibility for her dishonest actions her remorse could not be considered truly genuine. There was no doubting she was genuinely sorry for the situation in which she found herself but it was difficult for her to show genuine remorse for her conduct because of the way in which she had argued her position, namely that she had not acted in a consciously dishonest manner. Furthermore, the Committee was particularly concerned that the remorse she did express did not seem to address the impact of her actions upon the public and the profession as a whole.

90. The Committee did not agree with Mr Bradley QC's assertion that Dr Dyson had not moved on at all from the original hearing. She had made some progress, for example she was able to show some insight by the steps she had taken to avoid finding herself in such a stressful environment in the future. She made reference to taking her dogs for long walks, taking more holidays, expressing her vulnerability to friends and colleagues and knowing when to ask for advice. She had also had some counselling and been on a course on probity and ethics. These actions demonstrated a recognition that things had gone wrong and that active steps were needed to avoid repetition. Indeed, like the original Disciplinary Committee, this Committee considered it unlikely that Dr Dyson would repeat her dishonest conduct.

91. Accordingly, the Committee considered Dr Dyson had shown some insight, but that it was far from adequate in light of what was in effect her continued denial that she had in fact been knowingly dishonest on all those occasions highlighted by the original Disciplinary Committee in the sequence of events over that approximately three-week period in late 2018.

#### (b) The seriousness of those findings

92. The case which was found proved against Dr Dyson and which resulted in the removal of her name from the Register was, as the Committee explained in July 2021, very serious, in both its aspects, namely dishonesty and undermining the system of regulation designed to promote animal welfare and research ethics. The original Disciplinary Committee found her disgraceful conduct to be at the highest end of the spectrum of seriousness. This Committee agreed with that characterisation. Not only did Dr Dyson repeatedly lie to a whole host of

people in an attempt to cover up her first lies about there being a former Home Office Inspector on the AHT Ethical Committee and her subsequent contact with her ‘friendly inspector’, she went on to impersonate a Home Office Inspector in creating a bogus letter in an attempt to circumvent the need to follow the correct process and, when discovered, asked the Head of Operations at the Home Office to overlook her behaviour. As well as being dishonest, Dr Dyson abused the position of trust and the high esteem in which she was held.

(c) The protection of the public and the public interest

93. The Committee was of the view that the public interest in maintaining public confidence in veterinary surgeons and in the profession and in maintaining standards requires a veterinary surgeon to be able to (properly) reflect upon past misconduct, to have insight into that conduct and to take responsibility for it. Despite the time which has elapsed since the misconduct and since the original Disciplinary Committee’s findings, Dr Dyson’s insight and ability to take responsibility for her actions had barely changed from the position she took in July 2021, at the time of being removed from the Register. Her actions sent out a very poor message to other researchers about the appropriate action to take when faced with such a situation and whilst she clearly has much support from within the equine world, the Committee considered the general public’s confidence in the profession, and the RCVS as Regulator, would be seriously undermined by allowing Dr Dyson back on to the Register without her, at the very least, genuinely accepting full responsibility for her actions.

(d) The future of the welfare of animals in the event of the Applicant veterinary surgeon being permitted to have his or her name restored to the Register;

94. There is no suggestion that Dr Dyson’s return to the Register would present a risk to animal welfare.

(e) The length of time off the Register

95. The Committee noted that Dr Dyson had been off the Register for a year. She applied for restoration at the earliest possible time in accordance with Rule 20 of the Procedure Evidence Rules, as is her right, and has therefore been off the Register for the shortest time possible. In the Committee’s view, as postulated by Mr Bradley QC, Dr Dyson has had

insufficient time (or made insufficient use of the time) to reflect fully upon her actions, to develop insight into them, to take responsibility for them and to be able to express genuine remorse. The Committee also considered the perception of the general public in allowing a veterinary surgeon who had behaved as Dr Dyson had behaved back on to the Register after such a short period.

(f) The Applicant veterinary surgeon's conduct since removal from the Register

96. The Committee noted that, clinical matters aside, Dr Dyson has been able to continue with much of the work and research she had been conducting before her removal. The Committee considered Dr Dyson's continued dissemination of her knowledge to the equine industry to be positive and was impressed by how much she had been able to do since her removal from the Register.

(g) Efforts by the Applicant veterinary surgeon to keep up to date in terms of knowledge, skills and developments in practice, since removal from the Register

97. Dr Dyson provided ample evidence of her efforts to keep up to date in terms of knowledge, skills and developments in practice since removal from the Register.

(h) The impact on the Applicant veterinary surgeon of having his or her name removed from the Register

98. The Committee acknowledged that removal from the Register had caused Dr Dyson hardship, but such was the cost of her reprehensible behaviour and the inevitable consequence of being struck off the Register. It was clear that Dr Dyson felt she had been dealt with particularly harshly, but that view failed to reflect the gravamen of her disgraceful conduct and suggested a lack of insight. Her series of dishonest acts, designed to deceive those she was in contact with and culminating in her impersonation of a Home Office Inspector were most serious. This behaviour was exacerbated by her attempt to get another in a senior position to overlook her conduct, demonstrating a lack of integrity.

(i) The public support for the Applicant veterinary surgeon.

99. The Committee considered the very many positive references from a number of Dr Dyson's eminent professional colleagues and clients and there is no doubt that, particularly within the equine world, she continues to have considerable support. Dr Dyson may well have much to offer the profession and horses and a real desire to return to the profession, and those who have come across her as a practising veterinary surgeon may have the same desire. However, it is well established that to be fit to practise, professionals must have a real understanding of what they have done in the past and its impact or potential impact upon the profession and public confidence in it. That understanding cannot be achieved if the full extent of the misconduct is not accepted. It is acceptance of the full extent of the misconduct which results in insight. Remorse and insight do not go only to the prospects of the misconduct being repeated, they go to public confidence and maintaining standards.
100. Furthermore, as Mr Bradley QC submitted, Dr Dyson's fitness to practise is not to be considered solely within the narrow confines of her undoubted skills and experience or the high regard within which she is held within the profession in this country and beyond, or even whether her continued absence from the Register may have an impact upon Dr Dyson or upon horses. Fitness to practise includes the need for the maintenance of public confidence in the profession and the system of regulating it as well as the need to maintain standards of conduct amongst members of the profession.
101. The Committee considered that public confidence in veterinary surgeons and the profession will not be maintained if a veterinary surgeon who has been found to have committed very serious acts of dishonesty refuses to *genuinely* accept that that is the case. Dr Dyson says that she accepts the original Disciplinary Committee's finding that she acted dishonestly, but that acceptance carries little weight in light of what she said in her application and has said in her evidence to this Committee, because it involves a theoretical or objective concept of dishonesty which has no bearing upon her actual state of mind at the time of the actions in question. By not being truly accountable for her dishonest actions, Dr Dyson has thus far been unable to demonstrate anything other than limited insight into her disgraceful conduct.
102. In such circumstances, the Committee considered there would be a real and continuing risk to the reputation of the profession and to public confidence in the profession if Dr Dyson were restored to the Register. Conduct of this kind is of a particularly egregious nature for a

member of this profession and particularly so of one so eminent in her field and looked up to by so many. The Committee was of the view that if a veterinary surgeon, who has committed such serious offences and shown so little insight were nonetheless now allowed to practise, the public's trust in the profession was liable to be seriously undermined.

103. For a veterinary surgeon, conduct involving repeated and sustained dishonesty over a period of over three weeks, and which was directly related to her work, is at the highest end of the spectrum of serious professional misconduct. For the reasons outlined above, and in particular her inability to truly accept the findings of the original Disciplinary Committee, the Committee considered that allowing Dr Dyson to be restored to the Register at this time would seriously undermine public confidence in the profession. For all these reasons the application to restore Dr Dyson to the Register is refused.

## **DISCIPLINARY COMMITTEE**

**2 September 2022**