

ROYAL COLLEGE OF VETERINARY SURGEONS
DISCIPLINARY COMMITTEE

INQUIRY RE:

MISS BETHAN COOK

DECISION OF DISCIPLINARY COMMITTEE

STAGE 1 FINDINGS OF FACT

1. The Respondent Miss Cook is a registered veterinary surgeon.
2. The case brought by the College related to the Respondent's alleged conduct whilst she was facing employment disciplinary proceedings at the British Horseracing Authority ("BHA") where she was employed as a veterinary officer. The employment disciplinary proceedings were initiated in 2023 and a hearing had been due to take place on 06 June 2024.
3. The College's Charges related to the evidence on which the Respondent had sought to rely in the employment disciplinary proceedings. The College alleged that the Respondent had fabricated a letter from her GP, doctor GW ("BC Doctor report") and had caused it to be submitted to the BHA in connection with the proceedings. Further charges related to the Respondent's alleged conduct when BHA had questioned the authenticity of the BC Doctor Report and raised it with the Respondent.
4. The College brought the following Charges against the Respondent:

That, being registered in the Register of Veterinary Surgeons, and whilst in practice at the British Horseracing Authority ("BHA"):

1. *In or around May 2024 and/or June 2024, you:*

a. created a document (“BC Doctor report”) dated 20 May 2024 purporting to be from your General Practitioner, Dr GW;

b. on or around 4 June 2024, submitted or caused or allowed to be submitted the BC Doctor report to the BHA as part of a BHA disciplinary process relating to your conduct, thereby representing that the BC Doctor Report was from Dr GW when it was not;

2. On 7 June 2024, during a telephone call with NW, the Head of Human Resources and People at the BHA, you stated that Dr GW had written and provided the BC Doctor report to you when Dr GW had not done so;

3. On or around 10 June 2024, you:

a. created a document (“Letter.docx”) dated 20 May 2024 purporting to be a letter from Dr GW;

b. created an email message dated 20 May 2024 purporting to be from Dr GW, including an email address purporting to belong to Dr GW;

c. forwarded the said email message to NW with Letter.docx attached, thereby representing that the email message and Letter.docx were from Dr GW when they were not;

4. Your conduct in relation to 1(a), 1(b), 2, 3(a), 3(b) and/or 3(c) above, whether individually or in any combination, was:

a. misleading; and/or

b. dishonest;

AND that in relation to the above, whether individually or in any combination, you are guilty of disgraceful conduct in a professional respect.

5. At the start of the hearing, the Charges having been put to the Respondent, she admitted the following factual charges: 1a, 1b, 2, 3a, 3b and 3c. In addition, the Respondent admitted that her conduct, in relation to each of those charges of the Charges had been misleading, as set out in charge 4(a).

6. The Chair announced that, in relation to the admitted charges and in accordance with Rule 23.5 of the Royal College of Veterinary Surgeons Disciplinary Committee (Procedure and Evidence) Rules 2003 (“the Rules”) the Committee accepted the Respondent’s admissions as to fact made and dispensed with further proof of them.

7. In respect of the Respondent’s response to charge 4(b), the Committee considered that, having heard the Respondent’s position, the allegation of dishonesty was noted

as denied. The College therefore proceeded to open its case on the facts still in dispute and to call evidence.

8. The College relied on the evidence of the following:
 - Ms Joanne Horrell, Operations Lead, Human Resources at BHA, witness statement dated 25 May 2025
 - Ms Natalie Webb, Head of Human Resources at BHA, witness statement dated 28 March 2025
 - Mr Frankie Wicks, Head of Technology Strategy at BHA, witness statement dated 29 May 2025
 - Dr G W, General Practitioner, witness statement dated 27 March 2025
9. As part of the Case Management Process, an agreement was reached that the College could rely on the written Witness Statements of the majority of its witnesses, without the need to call them to give oral evidence.
10. From the above witnesses, Ms Horrell was the only witness called to give live, oral evidence. In addition, the College relied on correspondence it had with the Respondent regarding the allegations.
11. The Respondent gave evidence on her own behalf. In addition, the Respondent called Mr Simon Cowley, Stipendiary Steward at BHA until 2021, to give evidence concerning her character. The Respondent also relied on the written testimonials of a number of other character witnesses.
12. The Respondent also provided copies of limited medical records concerning her previous medical history. In addition, the Respondent provided copies of correspondence from her time employed by BHA.
13. Ms Horrell stated that the Respondent had been employed as a veterinary officer by BHA until she resigned in June 2024. The role included responsibility for regulatory work at racing fixtures, and compliance with the rules of racing from a veterinary or equine health and safety perspective.
14. Ms Horrell explained that, in September 2023, a disciplinary investigation had commenced, which was due for a hearing on 06 June 2024. On 04 June 2024, the Respondent's trade union representative, Mr Graham Ford, shared with BHA a document purporting to be a letter from the Respondent's GP, Dr G W, dated 20 May 2024 (the "BC Doctor Report"). The letter provided a summary of the Respondent's medical history and provided opinions on the impact of her medical conditions on her and events in the workplace. Copies of the relevant documents were exhibited. Ms Horrell and Ms Webb had concerns about the authenticity of the BC Doctor Report.

15. Ms Horrell stated that enquiries were raised with Dr G W's practice, who confirmed to Ms Horrell that the BC Doctor report did not originate with Dr G W nor the practice. The disciplinary hearing set for 06 June 2024 was postponed. On 07 June 2024, Ms Horrell stated that she was present when Ms Webb had a telephone conversation with the Respondent. Ms Horrell stated that she had listened in and had taken contemporaneous notes. She exhibited a copy of the comprehensive note taken. During the phone call, the Respondent was requested to provide proof of the GP sending the report.
16. Ms Horrell stated that, after the telephone conversation, on 10 June 2024, the Respondent had sent Ms Webb an email which purported to forward an email from Dr GW, the latter attaching a Word document. These too were exhibited. Ms Horrell stated that she had again contacted Dr G W's practice, who confirmed that neither the covering email nor the attached Word document originated from the GP practice.
17. Ms Horrell stated that she had completed and sent a concerns report form to the College, dated 24 July 2024. Ms Horrell stated that, thereafter, the College provided Ms Horrell copies of the Respondent's response to the allegations. Ms Horrell commented on the responses.
18. Ms Webb stated that on 04 June 2024 an HR colleague at BHA forwarded her an email. This had been an email from the BHA Union representative who had been assisting the Respondent in the disciplinary proceedings. The BC Doctor report had been attached to the email.
19. Ms Webb stated that she had a telephone call with the Respondent for about an hour on 07 June 2024. She stated that Ms Horrell had taken contemporaneous notes. Ms Webb confirmed the note was accurate and based her statement on that note.
20. Ms Webb stated that, in the call, she had informed the Respondent that it had been confirmed that the BC Doctor report was 'fake'. The Respondent asserted that the BC Doctor report WAS from her GP, but he had done it privately. She said that the Respondent had offered to pay for one to 'get it done properly'.
21. Ms Webb stated that she had challenged the Respondent on the authenticity of the BC Doctor report and had asked the Respondent to provide proof that Dr G W had sent it to the Respondent. Ms Webb stated that the Respondent continued to insist that Dr G W had written the BC Doctor report and that she could prove that. The Respondent offered to provide further medical evidence from the GP. However, Ms Webb had insisted on being sent proof that Dr G W had provided the BC Doctor report. Ms Webb stated later in the conversation, that the Respondent had conceded, "*okay he didn't write it then*" but that she did not know who had written it.
22. Ms Webb stated that, on 10 June 2024, she had received an email at 14:19 from the Respondent which enclosed another email dated 20 May 2024, from a 'yahoo.com' email address 'dgwales78' which attached a document having similar content but different formatting to the BC Doctor report. Ms Webb stated that she was aware that

enquiries with Dr G W's GP practice were made, and they confirmed the email address did not belong to Dr G W.

23. Mr Wicks stated that he had considered a number of documents provided to him by the HR team at BHA. These were the BC Doctor report in PDF form, an email from the Respondent to the HR team dated 10 June 2024 forwarding an email purportedly from Dr G W and the Word document attached to the latter. He was also able to interrogate the files contained on the Respondent's laptop.
24. Mr Wicks' evidence was that the PDF form and the Word document showed the Respondent as the author in the document properties. The former showed as having been created on 22 May 2024 and the latter as 10 June 2024. Mr Wicks stated that he had found no evidence to suggest that either these two documents or the 'Yahoo' email purportedly from Dr G W had originated from the latter GP or the surgery. He stated that there was no evidence to suggest that they had come from anywhere else than the Respondent.
25. The Respondent gave evidence to the Committee and had also provided a written statement to the College. The Respondent outlined her professional experience to the Committee. She said that she had been in post with BHA for a decade and had worked a 100-day per year contract. She stated that she had at first been happy, but latterly the relationship had broken down.
26. The Respondent described certain personal events [REDACTED] [REDACTED] The Respondent described an employment issue that had arisen. She described a [REDACTED] her isolation since losing her licence and partly due to her partner working away.
27. The Respondent said in her written statement that her representative had suggested getting a letter from her GP, in relation to the BHA disciplinary proceedings. In her oral evidence the Respondent said that she had made enquiries with her GP surgery about obtaining a GP report. She said that she had been informed that she would have to come into the surgery and the report could take some weeks to prepare. The Respondent said that [REDACTED] [REDACTED] she had also consumed a large volume of alcohol. She said at this stage, in this state, the Respondent must have written the 'report' from the GP [the BC Doctor report].
28. The Respondent stated that she later checked on her email and noticed the letter. However, she stated, she had been in a state of paranoia and panic and had also said she thought the letter had been 'planted' in her work device by the BHA.
29. The Respondent said that she had not been 'compos mentis' and had not known what she was doing when she submitted the BC Doctor report to her representative. The Respondent did not remember writing the letter. She denied that the report had been carefully crafted and said that she could write quickly.

At some point before 07 June 2024, the Respondent stated that she received a telephone call from Graham Ford, telling her that the BHA had suspicions about the authenticity of the BC Doctor report. She told the Committee that she had been unaware of that he was referring to and had 'bluffed' her way through the call.

30. The Respondent said in relation to the phone call on 07 June she had not been aware of the letter that Ms Webb was referring to and she had also bluffed her way through that call. She said that she had been afraid during the call and had not taken the opportunity to raise the concerns.
31. The Respondent said that she had merely forwarded the original BC Doctor report to BHA on 10 June 2024, not created another letter. She said she had merely sent the same letter as the BC Doctor report, under the cover of an email from another one of her personal email addresses. The Respondent could not explain the differences in the format of the two letters, but she stated that she did not have technical expertise.
32. The Respondent said that she had thought that the letter had been put on her device by BHA. She believed it was a conspiracy. She knew now it was ridiculous but she had been afraid of them.
33. The Respondent stated that she had subsequently realised that the stress of work [REDACTED] [REDACTED] was not helping her. After discussions with her parents she recognised the extent of what she had done and had resigned from her post. The Respondent denied that she had intended to gain anything or seek an advantage by sending the letters but had merely wanted to return to work. She provided copies of some of her medical records.
34. In addition to providing testimonial character references, the Respondent called Mr Simon Cowley to give character evidence. Mr Cowley was informed of the charges which the College had brought, something he was not aware of at the start of his evidence. He had written that he had experience of working with the Respondent for around 10 years until 2021 and found her diligent, scrupulous and honest. Mr Cowley told the Committee that he considered the admitted conduct completely out of character for the Respondent.
35. In closing, Ms Stevens relied on written submissions which she expanded on in the hearing. The College invited the Committee to find the Respondent's evidence to be concocted and untrue. It was submitted that the Respondent had engaged in a series of deliberate acts, initially for personal gain and continued as a deceit. It was submitted that the allegations had been proven so the Committee could be sure on all heads of charge.
36. The Respondent submitted that she had been unable to obtain or afford a witness to give evidence about her health. The Respondent took responsibility for her actions and did not seek to minimise them. She submitted that, at the relevant times, she had been influenced by [REDACTED] alcohol. [REDACTED]

[REDACTED] She had now reduced her work commitment to two days per week.

37. The Respondent submitted that the Committee should take into account her previous unblemished record and that she did not have a dishonest personality.
38. The Legal Assessor advised the Committee that the burden of proving the facts in the Charge lay on the College. The admitted facts had been found proved by in accordance with Rule 23.5, by virtue of the Respondent's admission. The burden lay on the College to prove charge 4(b) which was the allegation of dishonest conduct. He advised that the Committee had to make that decision in relation to each of the factual charges, 1(a), 1(b), 2, 3(a), 3(b) and 3(c).
39. The Legal Assessor advised the Committee that the College had to prove this charge to the 'higher civil standard', in other words, so that the Committee was 'sure'. He advised that the legal test of dishonesty to apply was that given by the Supreme Court in *Ivey v Genting Casinos* [2017] UK SC 67, charge 74. The Committee first had to determine the Respondent's actual state of knowledge or belief as to the facts. Once that was established, the question whether the Respondent's conduct was honest or dishonest was to be determined by the Committee, applying the (objective) standards of ordinary decent people.
40. The Legal Assessor advised the Committee that it was for the Committee to assess the evidence presented, and he referred the Committee to the cases of *R(Dutta) v GMC* [2020] EWHC 1974 and *Byrne v GMC* [2021] EWHC 2237. He advised that the Respondent's previous good character could be taken into account, but the Committee had to also weigh this with the fact that there had been some admissions as to conduct, including misleading conduct.

Decision

41. The Committee took time to consider the evidence and the parties' submissions. It heard and accepted the legal advice of the Legal Assessor.
42. The Panel took into account the Respondent's admissions that she had accepted having created the BC Doctor report and having caused it to be submitted to BHA. She had admitted having told Ms Webb in a phone call that Dr G W had written the BC Doctor report, when he had not.
43. The Respondent had admitted creating an email message dated 20 May 2024 falsely purporting to be from Dr G W from an email address purporting to be the doctor's email address. The Respondent had admitted that she had created 'Letter.docx' (the attachment to this email) purportedly from the doctor, together with her own cover email and having forwarded the email and Letter.docx to BHA. The Respondent had admitted that all of this conduct had been misleading.

Charge 1a

44. The Committee considered the initial creation of the document BC Doctor report. The Committee noted that the letter was comprehensive in content and set out detailed medical information about the Respondent. It also purported to set out opinions which was potentially of assistance to the Respondent in her upcoming disciplinary hearing, for example where it stated:

“I can have complete certainty in saying any adverse events that may have occurred in the workplace over the last 20-24 months will have been a direct result of her condition, and its gradual increasing severity.”

45. The Committee took into account the evidence, which had come from the Respondent, as to the following. The Respondent said that she had been advised by her representative that a GP letter might assist. The Respondent said that at the time she had been living some distance from the surgery. The Respondent’s partner had been working away and the Respondent was unable to drive. She said that the GP surgery had advised that the Respondent should attend the surgery, if she required a letter and it would take some weeks.

46. The Committee concluded that the Respondent had been told that she might benefit from a GP letter, but there were difficulties in obtaining one. The BC Doctor report which the Respondent admitted drafting was coherent, structured and supportive of the Respondent’s aim, namely to dispose of the disciplinary matter and to support a phased return back to work.

47. The Committee considered the Respondent’s explanation that she had not been aware when writing the BC Doctor report. She stated that this had been due to a combination of [REDACTED] and consuming alcohol, being isolated and facing a stressful situation at work.

48. The Committee took into account that it had some, partial medical information on the Respondent. [REDACTED]

However, the Committee had no sufficient evidence on the precise detail [REDACTED] or any impact of it and/or alcohol at the relevant time when the BC Doctor report was written.

49. The Committee accepted that the Respondent had a previously unblemished record. It considered that this had some relevance in considering the Respondent’s character, the credibility of her evidence and whether she was likely to have acted dishonestly.

50. The Committee took into account the character evidence provided. It noted that the majority of the written testimonials were written some time ago, mostly in July 2025, apparently for a court appearance in July 2025. None of the writers indicated that they were aware of the particular allegations in this case. This undermined the value of their statements, in the Committee’s view. The Committee was assisted by the evidence of

Mr Cowley, however it was apparent that he had only a general understanding of the allegations before attending the hearing. The Committee noted Mr Cowley's evidence that the alleged dishonesty was out of character for the Respondent. However, it balanced this with the admissions on the part of the Respondent. Overall, the Committee did not find that the character evidence should be afforded a great deal of weight in assessing whether the Respondent had acted dishonestly. The Respondent's evidence had been that she was not in the best of health, or emotional state, at the relevant time.

51. The Committee bore well in mind that the burden of proof lay on the College to prove the Respondent's dishonest conduct. In the Committee's view, the style and content of the BC Doctor report did not support that it had been written by a person who was labouring

The Committee rejected the Respondent's explanation.

52. The Committee considered that the Respondent's assertion of a lack of awareness of having written the letter, but having later discovered it and drawn the paranoid conclusion that it was 'planted' on her device by the BHA, was inconsistent with her action in then forwarding it to Graham Ford with a view to his submitting it to the BHA and supporting her case for phased returning to work. Those explanations were also inconsistent with her insistence to Ms Webb in their phone call on 07 June 2024, at least initially, that her GP had written the letter.

53. The Committee concluded that it was sure that the Respondent had created the BC Doctor report, knowing that it presented as the opinion of Dr G W and that it was intended to be used in and assist her case with the BHA. The Committee decided that ordinary decent people would regard this as dishonest conduct by their own objective standards.

Charge 1b

54. The Committee next considered whether the Respondent's admitted act in causing the BC Doctor report to be submitted to BHA had been dishonest. The Committee took into account that it had found that the Respondent had been dishonest in creating the document. It took into account that the documents showed that the Respondent had emailed the document to her representative. It was accepted by the Respondent that her representative had 'copied her in' to the submission to BHA.

55. The Committee considered the Respondent's case that she had simply discovered the BC Doctor report and sent it on, noting that this was not consistent with the Committee's finding in relation to charge 1a. The Committee considered the Respondent's evidence that, for a time, she had believed or suspected that the document had been 'planted' on her laptop or work device. However, the Committee found that this was inconsistent with the note of the telephone call between the Respondent and Ms Webb, in which the Respondent had insisted for most of the call

that the letter had been written by Dr G W. It considered that the Respondent would have raised the creation of the letter in the call. The Committee rejected the Respondent's suggestion that she had been frightened to do so since there had been no suggestion that she had raised the matter with Mr Ford.

56. The Committee also took into account the level of personal detail in the medical information in the BC Doctor report. It considered that this was inconsistent with the Respondent believing the letter had been drafted by BHA and 'planted' on her device.
57. The Committee, taking into account the detailed content and supportive nature of the BC Doctor report and the facts that the Respondent admitted having sent it on, and had not attempted to raise any concerns over the report, was sure that the Respondent had done so in the knowledge that the BC Doctor report was being represented as from Dr G W when it was not. The Committee was satisfied that ordinary decent people would regard this conduct as dishonest by their standards.

Charge 2

58. The Committee was provided by Ms Horrell with an exhibited note of the telephone call between Ms Webb and the Respondent. There had been no challenge to the content of the note exhibited. The Committee found that the note was a reliable record, bearing in mind that it had been compiled at the time of the call and by Ms Horrell, who took no part in the call and was acting in the course of her employment duties.
59. The Committee took into account that it was agreed evidence that the call had been around an hour in length. The note recorded that the Respondent had continued to assert on several occasions that the BC Doctor report had been prepared by Dr G W. It also recorded that, towards the end of the call, the Respondent had said that he had not done so but that she did not know who had.
60. The Committee took into account the Respondent's explanation, that she had been too frightened to bring up with Ms Webb her belief or suspicion that the document had been 'planted'. Taking into account the seriousness of the situation, the Committee considered that the Respondent would have raised this. The Committee also noted the Respondent's evidence that she had lied in the telephone call and had said anything she could to end the call. The Committee rejected the Respondent's oral evidence.
61. The Committee took into account its previous finding that the Respondent had been aware of creating the BC Doctor report and had knowingly sent it to her representative.
62. The Committee was sure that, in stating to Ms Webb that the BC Doctor report had been provided by Dr G W during the telephone call, she had done so knowing that this was untrue. The Committee was satisfied that ordinary decent people would regard this conduct as dishonest by their standards.

Charges 3a, 3b, 3c

63. The Committee considered the timeline of the circumstances in which the Respondent had created Letter.docx, created the covering email and sent both to Ms Webb. It was noted from the emails provided that, on 10 June 2024, at 08:58, Ms Webb had sent an email to the Respondent, setting a deadline of 17:00 on that day for sending proof of the GP's letter. The evidence of the meta-data around creation of the Letter.docx showed it was created on 10 June 2024 at 12:39. The email sending the documents to Ms Webb was timed at 14:19.
64. The Committee was sure that the evidence showed that pressure was being applied on the Respondent to provide support for her contentions. The Respondent had admitted creating both documents and sending them to Ms Webb, using an email designed to be attributed to Dr G W. She had admitted that the documents were misleading.
65. The Committee took into account that the covering email had purported to come from Dr G W, that this was not true and the Respondent was aware of this. The Committee took into account that, having previously created and caused to be sent in BC Doctor report, which the Respondent had known was not a true report by Dr G W, she was sending in another copy which represented it was from the doctor.
66. The Committee took into account the Respondent's evidence, that matters had 'snowballed'. It noted the Respondent's explanation that Letter.docx was not a 'new' document but a re-sending of the original. However, the Committee noted that there were several formatting differences and the evidence that Letter.docx was created as a separate word document, whereas BC Doctor report was a pdf document with an earlier creation date.
67. The Committee decided that it was sure that the Respondent had created both documents in the knowledge that they represented themselves as having been prepared by Dr G W, when that was not the case and the Respondent had been aware that was the case. The Committee was satisfied that ordinary decent people would regard this conduct as dishonest by their standards.
68. The Committee therefore found charge 4(b) that the Respondent's conduct was dishonest proved, in respect of each of charges 1a, 1b, 2, 3a, 3b and 3c.