

**Professional Conduct Committee
Review Hearing**

1 August 2025

Name: SOUHANI, Ali Mohammed

Registration number: 74217

Case number: CAS-197116

General Dental Council: Andrew Molloy, Counsel
Instructed by Amy Jones, IHLPS

Registrant: Not present and unrepresented

Fitness to practise: Impaired

Outcome: Suspension extended (with a review)

Duration: 12 months

Committee members: Martin Isherwood (Chair, Dental Care Professional Member)
Jeannett Martin (Lay Member)
Phillip Loughnane (Dentist Member)

Legal adviser: Alex Coleman

Committee Secretary: Jenny Hazell

1. This is a hearing before the Professional Conduct Committee (PCC) pursuant to Section 27C of the Dentists Act 1984 (as amended) ('the Act'). The hearing is being conducted remotely via Microsoft Teams.

2. Mr Ali Souhani was not present and not represented. Mr Molloy, Counsel, appeared on behalf of the General Dental Council (GDC).

Decision on service of Notice of Hearing

3. In the absence of Mr Souhani, the Committee first considered whether the Notice of Hearing ('the Notice') had been served on Mr Souhani in accordance with Rules 28 and 65 of the 'General Dental Council (Fitness to Practise) Rules Order of Council 2006' ('the Rules'). Mr Molloy referred to the relevant documents and invited the Committee to find that the GDC had complied with the requirements of Rules 28 and 65 and to proceed in the absence of Mr Souhani.

4. The Committee had regard to the hearing bundle which contained a copy of the Notice of Hearing (the Notice) dated 18 June 2025. The Notice was sent to Mr Souhani's registered address by Special Delivery on 18 June 2025, in accordance with Section 50A of the Act, and by First Class post and via secure email on the same date.

5. The Royal Mail 'Track and Trace' receipt confirmed that the item was delivered to Mr Souhani's registered address on 19 June 2025 and was signed for against the printed name of 'SOUHANI'.

6. The Committee was satisfied that the Notice contained proper and correct information relating to today's review hearing. This included the time and date of the hearing, as well as the fact that the hearing was being conducted remotely via Microsoft Teams. The Notice advised Mr Souhani that if he chose not to attend the review hearing, the Committee may proceed and make a decision in his absence.

7. In light of the information available, the Committee was satisfied that the Notice had been served on Mr Souhani in accordance with the Rules and the Act.

Decision on whether to proceed in the absence of Mr Souhani

8. The Committee next considered whether to exercise its discretion to proceed with the hearing in the absence of Mr Souhani and/or any representative on his behalf. In so doing, the Committee had regard to the hearing bundle as well as the GDC's addendum bundle. The Committee was mindful that its decision to proceed in the absence of Mr Souhani must be handled with the utmost care and caution. The Committee accepted the advice of the Legal Adviser.

9. Mr Molloy submitted that it is clear from the documents that Mr Souhani is aware of today's hearing, having received the Notice on 19 June 2025, but he has chosen not to attend. Mr Souhani has provided no reason for his non-attendance and he has not sought an adjournment. Mr Molloy also referred to Mr Souhani's history of non-attendance at previous PCC hearings. Mr Molloy submitted there is no indication that an adjournment would secure his attendance at a later date. Mr Molloy also submitted that the Committee has a statutory obligation to conduct a review of the order expeditiously.

10. In short, Mr Molloy submitted that it would be fair and appropriate to proceed with today's hearing in the absence of Mr Souhani.

11. The Committee accepted the advice of the Legal Adviser.

12. The Committee was satisfied that Mr Souhani is aware of today's hearing, having received the Notice on 19 June 2025. Mr Souhani has not responded to the Notice regarding his attendance at this hearing, despite being asked to do so by 30 June 2025. He has also not provided the GDC with any written submissions and/or documents, despite being invited to do so by 28 July 2025.

13. In addition, the Committee had regard to the addendum bundle which shows the attempts made by the GDC to call Mr Souhani on his registered telephone number twice on 30 July 2025, but no reply was received. There was also an email dated 30 July 2025 from the GDC to Mr Souhani's registered email address in which he was invited to inform the GDC whether he would be attending the review hearing and/or be represented. No response was received to that email.

14. In addition, the Committee bore in mind that Mr Souhani did not attend his previous review hearing. There was no information before the Committee that adjourning this hearing would secure his attendance at a later date. The Committee has concluded that Mr Souhani has absented himself from today's hearing.

15. In all these circumstances, the Committee determined that it was fair and in the public interest to proceed with the hearing in the absence of Mr Souhani and any representative on his behalf.

Background

16. This hearing was convened to review the current suspension order, which is due to expire on 13 September 2025.

17. This is the third review of a substantive order initially imposed by the Professional Conduct Committee ('the initial PCC') in October 2022. At that initial hearing the PCC reached a number of findings against Mr Souhani which can be summarised as follows:

"The Committee notes the GDC expert, in his report considered that a substantial number of the shortcomings identified in your treatment of Patient 1 amounted to a falling far below the standard expected of a reasonably competent dentist. The Committee agrees. The failings covered basic aspects of dental practice. Your reckless behaviour resulted in Patient 1's UR8 being left partially in situ following an attempt to extract it. You also informed Patient 1 that you had successfully extracted her UR8, which was found to be both misleading and lacking in integrity. This clearly amounted to a falling far below the standard expected of a reasonably competent dentist."

18. The PCC determined that Mr Souhani's fitness to practise was currently impaired. In reaching its decision, the PCC stated:

"The Committee is satisfied that the findings against you are capable of being remedied. You have apologised to Patient 1 and also to this Committee. You have shown remorse and made a number of admissions. However, it considers that the remedial steps you have taken are still ongoing, with limited evidence that they have been embedded into your practice over a sustained period of time."

... the Committee is concerned that you have not developed full insight into the matters that brought you before the GDC. Further, given that your practice has been called into question by the GDC in relation to similar matters, on more than one occasion, the Committee considers that the risk of repetition remains...

Taking all these factors into account, including the Committee's concerns about your insight and the slow progress you have made in addressing basic aspects of dentistry, the Committee considers that you continue to pose a risk to patients."

19. The PCC directed that Mr Souhani's registration be subject to conditional registration for a period of 12 months with a review hearing. The Committee was satisfied that this period was appropriate and proportionate to enable Mr Souhani to consolidate his remediation.

20. An early review was held in August 2023 at the request of the GDC due to a change of circumstances since the imposition of the conditions of practice order. Mr Souhani did not attend that review hearing and he was not represented. The GDC submitted that Mr Souhani had failed to comply with the conditions on his registration. The PCC noted from Mr Souhani's correspondence with the GDC that he had provided mixed information as to his intentions to practise. He had also sought further information regarding voluntary removal from the Register. The PCC concluded that Mr Souhani had failed to comply with his conditional registration.

21. The PCC concluded that Mr Souhani's fitness to practise remained impaired on the grounds of public protection and in the wider public interest. It directed that the conditions of practice order be revoked and replaced by a suspension order for a period of 12 months.

22. The PCC's decision to revoke Mr Souhani's conditions of practice order and to replace it with a suspension order can be summarised as follows:

"As Mr Souhani has failed to demonstrate compliance with the current conditions and has not engaged meaningfully with the GDC, the Committee concluded that conditional registration is no longer workable or appropriate in the circumstances. It has already identified a continuing risk to the public and the necessity to declare and uphold proper standards.

Therefore, the Committee determined that a suspension order, with immediate effect, is now the only appropriate sanction that would both protect the public and satisfy the wider public interest. This shall be for a period of 12 months to allow Mr Souhani sufficient time to either demonstrate that he has gained the requisite insight and demonstrated remediation of his previous failings and engage meaningfully with the GDC, or to pursue his intention to remove himself from the Register, according to the advice of the GDC."

23. The PCC reviewed the suspension order on 2 August 2024. Mr Souhani was not present or represented at that hearing. The PCC noted that Mr Souhani had not provided any submissions for the Committee's consideration or engaged with the GDC.

24. The PCC considered that Mr Souhani had failed to demonstrate that he had sufficiently developed his insight and remediated any of his previous failings. The PCC noted that since the imposition of the suspension order, Mr Souhani had engaged only to request an oral review of his substantive order and then failed to attend that hearing on 2 August 2024.

25. The PCC was satisfied that should Mr Souhani be permitted to practise without restriction, he would pose a real risk of harm to patients. It concluded that Mr Souhani's fitness to practise remained impaired on the ground of public protection and on the ground of the public interest.

26. In the PCC's judgement, given that Mr Souhani had failed to provide any evidence of insight or remediation since the imposition of the suspension order, the PCC concluded that conditional registration would be neither workable nor practical. It therefore directed that Mr Souhani's registration be suspended for a period of 12 months

Today's review hearing

27. This Committee comprehensively reviewed the suspension order. In so doing, it has had regard to the GDC's bundle of documents. It noted that Mr Souhani has not engaged with the GDC since the last review hearing in August 2024 and he has not provided any of the documents suggested by the PCC.

28. Mr Molloy submitted that Mr Souhani has not engaged with the GDC and has not provided any evidence of further insight or remediation into his previous misconduct. Mr Molloy submitted that in the absence of any information or engagement, Mr Souhani's fitness to practise remains impaired. Mr Molloy advised that Mr Souhani has not submitted a further application for Voluntary Removal from the Register.

29. Mr Molloy invited the Committee to extend the substantive suspension order for a further period of 12 months.

Decision on current impairment

30. The Committee considered whether Mr Souhani's fitness to practise remains impaired by reason of his misconduct. In doing so, the Committee exercised its own independent judgement. It bore in mind that its duty is to consider the public interest, which includes the protection of the public, the maintenance of public confidence in the profession and the declaring and upholding of proper standards of conduct and behaviour.

31. The Committee accepted the advice of the Legal Adviser.

32. In deciding whether Mr Souhani's fitness to practise remains impaired, the Committee considered whether he has addressed the concerns identified by the previous PCC, notably that he has been able to demonstrate remediation of his failings and to demonstrate insight into his conduct.

33. At this review, the Committee acknowledged that a persuasive burden is on Mr Souhani and that in the absence of any evidence to the contrary, he has failed to demonstrate that he has sufficiently developed his insight and remediated any of his previous failings. The Committee noted that since the imposition of the suspension order in August 2023, some two years ago, Mr Souhani's engagement with the GDC was limited to a request for an oral review of his substantive order, which he then failed to attend.

34. The Committee was satisfied that should Mr Souhani be permitted to practise without restriction, it would pose a real risk of harm to patients. Therefore, the Committee concluded that Mr Souhani's fitness to practise remains impaired on the ground of public protection.

35. In addition, the Committee determined that an informed member of the public would be shocked and surprised to find that Mr Souhani was permitted to practise without restrictions given his ongoing lack of engagement with the GDC as his regulator and the public protection risks identified. Therefore, the Committee concluded that Mr Souhani's fitness to practise is also impaired on the ground of public interest.

Decision on sanction

36. The Committee had regard to the 'Guidance for the Practice Committees, including Indicative Sanctions Guidance' (Revised May 2019). The Committee considered what, if any, sanction to impose in this case. The Committee was aware of the range of sanctions available to it and that it must consider the sanctions in order from the least serious.

37. The Committee was aware that it should have regard to the principle of proportionality, balancing the public interest against Mr Souhani's own interests. The public interest includes the protection of the public, the maintenance of public confidence in the profession, and declaring and upholding standards of conduct and performance within the profession.

38. The Committee borne in mind Mr Souhani's continual failure to provide any evidence of insight or remediation since the imposition of the suspension order some two years ago. It also borne in mind Mr Souhani's previous failure to comply with conditional registration. In these circumstances, the Committee concluded that conditional registration would be neither workable nor practical, especially given the ongoing concerns regarding Mr Souhani's engagement.

39. Therefore, the Committee determined that suspension is the only appropriate and proportionate sanction that would protect the public and satisfy the wider public interest. It concluded that a period of 12 months would allow Mr Souhani sufficient time to either demonstrate that he has gained the requisite insight and demonstrated remediation of his previous failings and engage meaningfully with the GDC.

40. Notification of this decision will be served on Mr Souhani in accordance with the Act.

41. That concludes this determination.