

PUBLIC HEARING

Professional Conduct Committee Initial Hearing

6 – 8 July 2026

Name: NIKOLOV, Todor Nenkov

Registration number: 175280

Case number: CAS-212810

General Dental Council: Mr Tom Stevens, Counsel
Instructed by Holly Watt, IHLPS

Registrant: Not Present
Unrepresented

Fitness to practise: Impaired by reason of misconduct

Outcome: Erased with Immediate Suspension

Immediate order: Immediate suspension order

Committee members: Marnie Hayward (Chair, Dental Care Professional Member)
Jonathan Farmer (Dentist Member)
Jane Jones (Lay Member)

Legal adviser: Trevor Jones

Committee Secretary: Jenny Hazell

1. This is a Professional Conduct Committee (PCC) hearing in respect of a case brought against Mr Nikolov by the General Dental Council (GDC). The hearing is being conducted remotely by Microsoft Teams video-link.
2. Mr Nikolov is neither present nor represented at this hearing. Mr Tom Stevens, Counsel, appears on behalf of the GDC.

Application to proceed with the hearing in the absence of the registrant

3. At the outset, Mr Stevens made an application under Rule 54 of the GDC (Fitness to Practise) Rules Order of Council 2006 ('the Rules'), for the hearing to proceed in the absence of Mr Nikolov. He submitted that the GDC has complied with the requirements of serving the Notice of Hearing (the Notice) on Mr Nikolov in accordance with Rules 13 and 65, as demonstrated by the documents before the Committee. This included a copy of the Notice of Hearing dated 2 June 2026, contained in the main hearing bundle, which sets out the allegations against Mr Nikolov as well as the date and time of the hearing. The letter further set out that the hearing was to take place remotely. The letter was sent by international track and signed for service and international standard delivery to Mr Nikolov's registered address. In addition, the letter was emailed on 2 June 2026 to Mr Nikolov's registered email address and another email address which he has used in correspondence with the GDC.
4. Mr Stevens also referred to emails dated 16, 24 and 29 June 2026 from the GDC's instructing solicitor to Mr Nikolov's registered email address and another email address which Mr Nikolov has used in correspondence with the GDC. Those emails confirm the date of the hearing and reminded Mr Nikolov to notify the GDC whether he would be attending the hearing. In addition, the GDC's email dated 24 June 2026 contained a copy of the GDC's bundle for the upcoming hearing, which Mr Nikolov was invited to comment on by 29 June 2026. The GDC received no response from Mr Nikolov in relation to these emails.
5. Mr Stevens referred the Committee to Mr Nikolov's email dated 8 September 2025 to the GDC's Rule 4 Team, in which Mr Nikolov set out his responses to the allegations. This was following on from his telephone call on 21 August 2025 with a GDC employee regarding receipt of the Rule 4 correspondence. Since then Mr Nikolov has not been in contact with the GDC in relation to these proceedings, despite his assertions that he wanted to be part of the case. Mr Stevens submitted that Mr Nikolov has not requested an adjournment of these proceedings and were the Committee minded to adjourn the hearing, there was little guarantee that Mr Nikolov would attend on a future date. He reminded the Committee of the GDC's over-arching statutory objective, namely the protection of the public, and submitted that there was a clear public interest in the expeditious disposal of allegations which call into question a registrant's fitness to practise. Mr Stevens submitted that there are no good reasons for adjourning the hearing and that the hearing should proceed in the absence of Mr Nikolov.
6. The Committee took account of the submissions made by Mr Stevens, as well as the information contained in the GDC's bundles of documents. The Committee has accepted the advice of the Legal Adviser.

Decision on service

7. The Committee first considered whether the Notice of Hearing (the Notice) had been served on Mr Nikolov in accordance with Rules 13 and 65 and Section 50A(2) of the Dentists Act 1984 (as amended) (the 'Act'). It had regard to the Notice of Hearing dated 2 June 2026 which was sent to Mr Nikolov's registered address by International Track and Signed for service and by International Standard Delivery. The Committee was satisfied that the address shown on the Notice is the same address as that shown in the bundle as being Mr Nikolov's registered address with the GDC. The Royal Mail 'Track and Trace' receipt confirms that the Notice was sent on 2 June 2026.

8. The Committee was satisfied that the GDC sent the Notice to Mr Nikolov's registered address on 2 June 2026 and that this complied with the 28-day notice period required by Rule 13. The Notice contained all the required particulars, including the date and time of the hearing, confirmation that the hearing would be held remotely by Microsoft Teams as well as setting out the allegations against Mr Nikolov. The Notice further set out that the Committee had the power to proceed with the hearing in the absence of Mr Nikolov.

9. The Notice was also sent on 2 June 2026 by secure email to two known email addresses – one recorded as Mr Nikolov's registered email address and the second one is the same email address used by Mr Nikolov in his email to the GDC dated 8 September 2025. There is a download receipt which confirms that the file for one of the emails was downloaded on 8 June 2026.

10. On the basis of all the information provided, the Committee was satisfied that the Notice had been served on Mr Nikolov in accordance with the Rules and the Act.

Decision on whether to proceed with the hearing in the absence of the registrant

11. The Committee next considered whether to exercise its discretion under Rule 54 to proceed with the hearing in the absence of Mr Nikolov. It has taken into account the factors to be considered in reaching its decision, as set out in the case of *R v Jones* [2003] 1 AC 1HL, and as affirmed in the regulatory case of *General Medical Council v Adeogba* [2016] EWCA Civ 162. The Committee also had regard to paragraphs 33 to 37 (under the heading *Proceeding in the absence of the registrant*) of the GDC's 'Fitness to Practise: Guidance for the practice committees' (effective from 6 January 2026) (the GDC's Guidance).

12. The Committee has borne in mind the need to be fair to Mr Nikolov as well as the GDC's overall objective which is the protection of the public. The Committee is satisfied that all reasonable efforts have been made by the GDC to notify Mr Nikolov of this hearing. He was also invited to provide the GDC with any further evidence he wished to rely on. Mr Nikolov did not respond to the GDC's invitation.

13. The Committee has also had regard to Mr Nikolov's pattern of non-attendance at previous PCC's hearings, as referred to in the bundle of documents, as well as his failure to attend the Dental Council of Ireland (DCI) disciplinary hearing in October 2024. In these circumstances, the Committee has concluded that Mr Nikolov has voluntarily absented himself from these proceedings. He has not requested an adjournment of these proceedings and there is no information before it to suggest that adjourning this hearing would secure Mr Nikolov's attendance at a future date.

14. The Committee is mindful that the allegations in this case relate to Mr Nikolov's probity, and potentially give rise to substantive potential risks to the public and public confidence which ought to be determined without undue delay. The Committee also notes that the GDC has several witnesses in this case who are available to give evidence, should the Committee wish to hear from them.

15. In the Committee's judgement, there is no good reason before it as to why it should adjourn the hearing. Accordingly, the Committee has determined that it was fair and in the public interest to proceed with the hearing in the absence of Mr Nikolov.

The GDC's case

16. The allegations against Mr Nikolov are as follows:

1. *On or around 15 June 2017, as part of your application for registration with the Dental Council of Ireland ('DCI'), you signed a declaration confirming "that I have listed all regulatory bodies that I have ever been registered with in the past and present". However,*

you did not list that you had been registered with the General Dental Council ('GDC') since June 2009.

2. *Your conduct in Charge 1 was:*

- a. misleading;*
- b. lacking integrity;*
- c. dishonest – in that you knew you were required to disclose your registration with the GDC as part of your DCI registration application.*

3. *You failed to immediately inform the GDC of the DCI's decision (dated 4 October 2024) to remove you from their 'Register of Dentists'.*

4. *Your conduct in Charge 3 was:*

- a. misleading;*
- b. lacking integrity;*
- c. dishonest – in that you knew you were required to immediately inform the GDC of the DCI's decision.*

AND that by reason of the matters alleged above your fitness to practise is impaired by reason of misconduct.

17. Mr Stevens outlined the background to the GDC's case against Mr Nikolov. Mr Nikolov was registered with the GDC as a dentist on 17 June 2009. In April 2016 he was suspended for a period of 12 months by the GDC's Professional Conduct Committee (PCC). That suspension order was extended by the PCC in April 2017 for a further period of 12 months. He was indefinitely suspended by the PCC in April 2018. This means that Mr Nikolov is restricted from practising although he remains on the GDC's Register.

18. On or around 15 June 2017 Mr Nikolov applied for registration with the Dental Council of Ireland (DCI). In the form he stated that he was registered with the Bulgarian Dental Association. There was no indication on his application form that he practised and/or was registered elsewhere. The GDC's case is that Mr Nikolov failed to disclose to the DCI that he was registered with the GDC (charge 1) and that his conduct was misleading, lacking integrity and dishonest (charge 2).

19. The DCI, unaware of Mr Nikolov's registration status with the GDC, accepted Mr Nikolov's application onto their register on 20 December 2017.

20. In or around late May 2024 the DCI became aware through the Health Service Executive (HSE) that the HSE had received an employment application from Mr Nikolov. While undergoing their due diligence checks the HSE googled the Registrant. A posting regarding the GDC's restrictions on Mr Nikolov's registration came up. The DCI checked the GDC's website on receiving the call and then re-examined the application form. The DCI found that Mr Nikolov had not disclosed his registration with the GDC or any work history undertaken in the UK.

21. On 5 June 2024 the DCI notified Mr Nikolov that they would be considering the alleged concerns relating to his failure to disclose his registration with the GDC. Mr Nikolov telephoned the DCI on 6 June 2024.

22. On 5 July 2024 the DCI notified the GDC that it had recently come to their attention that they had a dentist with the name of Mr Nikolov on its register and that on reviewing his application for registration, Mr Nikolov did not disclose that he had worked in the UK or that he had ever been registered with the GDC. The DCI provided the GDC with relevant information and asked it to confirm whether the details of the dentist on their register matched the details that appear on the GDC's

register. They also asked for further information relating to Mr Nikolov's registration status with the GDC. The DCI indicated that it was intending to hold a hearing into the matter in September 2024.

23. The GDC's Registration Casework Team carried out further investigations and confirmed that the Mr Nikolov currently registered with the DCI, was the same Mr Nikolov registered with the GDC since June 2009. The GDC provided the requested information to the DCI by letter dated 16 September 2024. Once Mr Nikolov had been identified as the same person, the DCI sent a letter dated 23 September 2024 notifying Mr Nikolov that the DCI would be meeting on 4 October 2024 to consider correcting the Register by removing his name from the register of dentists.

24. On 4 October 2024 the DCI decided to remove Mr Nikolov's name from their Register of Dentists. He was notified of this decision by letter. The GDC's case is that Mr Nikolov failed to immediately notify the GDC of this decision (charge 3) and that his conduct in this regard was misleading, lacking integrity and dishonest (charge 4).

25. In support of its case the GDC relies on the following witness statements with associated exhibits:

- The statement of witness 1 (employee of the DCI) signed and dated 8 January 2026; the supplementary statement of witness 1 dated 20 January 2026.
- The statement of witness 2 from the GDC's Registration Casework Team, signed and dated 9 January 2026
- The statement of witness 3 from the GDC's Fitness to Practise Team, signed and dated 12 January 2026
- The statement of witness 4 from the GDC's Casework Manager, signed and dated 3 January 2026. She formally adopts witness 3's statement.

26. The GDC indicated that it did not intend to call these witnesses but indicated that it was open to the Committee to call them, should they wish to do so. Having reviewed the contents of their statements carefully the Committee decided not to call any of the witnesses above since their statements draw mainly on documentary records which are contained as exhibits. Their statements were therefore accepted.

Findings of Fact

27. The Committee considered all the evidence presented to it. It took account of the submissions made by Mr Stevens on each of the alleged facts. The Committee has borne in mind that Mr Nikolov has not formally responded to the allegations although he has set out his responses to the allegations at an earlier stage of the investigation in his email to the GDC dated 8 September 2025. The Committee accepted the advice of the Legal Adviser.

28. The Committee considered the factual allegations separately, bearing in mind that the burden of proof rests with the GDC and that the standard of proof is the civil standard, that is, whether the alleged matters are proved on the balance of probabilities.

29. In respect of the allegation of lacking integrity, the Committee has kept in mind the GDC's Standards, which requires that registrants must act with integrity. It has also had regard to the test set out in the case of *Wingate & Anor V Solicitors Regulation Authority* [2018] EWCA Civ 366. Regarding dishonesty, the Committee has applied the test set out in *Ivey v Genting Casinos (UK) Ltd. t/a Crockfords* [2017] UKSC 67. The test is that the Committee must decide subjectively the actual state of an individual's knowledge or belief as to the facts, and must then apply the objective standards of ordinary and decent people to determine whether the individual's conduct was dishonest by those standards.

30. The Committee made the following findings:

1	<i>On or around 15 June 2017, as part of your application for registration with the Dental Council of Ireland ('DCI'), you signed a declaration confirming "that I have listed all regulatory bodies that I have ever been registered with in the past and present". However, you did not list that you had been registered with the General Dental Council ('GDC') since June 2009.</i> Found proved Witness 2 set out in her statement that she checked Mr Nikolov's application with the GDC received on 7 April 2009, including the name, date of birth and any further information supplied, such as qualifications, against the Registrant's application. She confirmed that the Mr Nikolov registered with the DCI was the same Mr Nikolov registered with the GDC. Witness 2 further set out that Mr Nikolov first gained entry with the GDC register on 17 June 2009 and has maintained registration continuously since then. She exhibited a screenshot of the live GDC register showing Mr Nikolov's current registration status. The screenshot confirms that Mr Nikolov was indefinitely suspended following a PCC outcome in April 2018. Witness 1 exhibited a copy of Mr Nikolov's application form and supporting documents made by Mr Nikolov on 15 June 2017 to join the DCI's register. Witness 1's evidence was that in the form Mr Nikolov stated that he was registered with the Bulgarian Dental Association and had been practising in his own practice in Bulgaria for about 27 years. On Witness 1's account " There was no indication on his application that he practiced anywhere else, so there wasn't anything disclosed in the application that would have caused us sufficient concern to contact an employer." The Committee has had regard to Mr Nikolov's application form, signed and dated on 15 June 2017, which discloses the details of the Bulgarian Dental Association and the dates when he was registered there. However, there is no reference to Mr Nikolov being registered with the GDC. The Committee considers that the form is very clear in its meaning and that Mr Nikolov would have known what a regulatory body was, given that he has listed the Bulgarian Dental Association on the form. The Committee has had regard to the evidence provided by the GDC's witnesses that at the time when Mr Nikolov signed the statement on 15 June 2017 he had been registered with the GDC since June 2009 and his registration was currently suspended. In Mr Nikolov's email to the GDC dated 8 September 2025 he set out his written observations to the GDC's Rule 4 response. In that email he set out, under the heading 'Employment History' that his registration with the GDC began in June 2009. He further set out "I regret the omission of my UK registration details in my 2017 application to the Dental Council of Ireland and accept the regulatory findings." Taking all these matters into account, the Committee is satisfied that this charge is found proved.
2	<i>Your conduct in charge 1 was</i>
2a	<i>Misleading</i> Found proved The Committee is satisfied that Mr Nikolov's failure to declare to the DCI that he had been registered with the GDC since June 2009 was objectively misleading because it meant that the DCI understood him to have only been registered with the Bulgarian Dental Association and no one else, when this was not the case. This misrepresentation

	resulted in Mr Nikolov being admitted to the Register of Dentists in Ireland without further enquiries, such as requesting a certificate of good standing from the GDC. Accordingly, the Committee finds this charge proved.
2b	<i>Lacking integrity</i> Found proved The Committee, having regard to the principles set out in <i>Wingate & Anor V Solicitors</i>, considers that Mr Nikolov, as a registered dentist, had a professional responsibility to take care when completing forms to ensure that they contain accurate information. This is especially so in the context of professional registration with another regulatory body. Mr Nikolov withheld information which was misleading. Standard 1.3 of the GDC's Standards for the Dental Team (September 2013) states "You must be honest and act with integrity." The Committee is satisfied that Mr Nikolov's conduct in withholding information from the DCI relating to his registration with the GDC constituted a lack of integrity and was a significant departure of the standards expected of a registered dentist. Accordingly, the Committee finds this charge proved.
2c	<i>Dishonest</i> Found proved The Committee considers that the form is clear as to what is required to be declared in the context of registration as a dentist with another professional body. The Committee is satisfied that it would have been clear to Mr Nikolov that at the time when he signed the declaration he was aware about his registration status with the GDC, namely that he remained suspended. In Mr Nikolov's email to the GDC dated 8 September 2025 he accepted that at the time when he submitted the application to the DCI he was registered with the GDC. The Committee has concluded that Mr Nikolov's failure to declare that he had been registered with the GDC since June 2009 was a deliberate act of concealment. He would have been aware that his registration status with the GDC may well have impacted on the DCI's decision in relation to his application for registration. The Committee further concluded, that Mr Nikolov's actions were objectively dishonest, applying the standards of ordinary decent people. Accordingly, the Committee finds this charge proved.
3	<i>You failed to immediately inform the GDC of the DCI's decision (dated 4 October 2024) to remove you from their 'Register of Dentists'.</i> Found proved Witness 1 sets out in their statement how it was that the DCI became aware of Mr Nikolov's registration status with the GDC. This in turn triggered an investigation by the DCI in which they liaised with the GDC and confirmed that the Mr Nikolov registered with the DCI was the same Mr Nikolov registered with the GDC. Witness 1 further set out a note of a telephone conversation between him and Mr Nikolov on 6 June 2024 which records that Mr Nikolov had received the DCI's letter dated 5 June 2024 and Witness 1 advised him that he had received a copy of the GDC's determinations against him where his registration had been suspended. There is also

	reference to a second telephone conversation on 30 September 2024 with another member of staff and Mr Nikolov regarding his non-disclosure of his GDC registration. The Committee is satisfied, in light of these two telephone calls, that Mr Nikolov was aware that DCI was looking into his registration status. The Committee has had regard to the letter dated 7 October 2024 which was sent from the DCI's solicitors to Mr Nikolov's address which confirms the DCI's decision on 4 October 2024 to remove his entry and registration on the Register of Dentists. This was because the DCI "<i>was satisfied that your registration was procured by misrepresentation, namely material non-disclosure relating to your previous employment history and registration in the UK.</i>" Standard 9.3.3 of the GDC's standards states: "You must inform the GDC immediately if a finding has been made against your registration by another healthcare regulator, either in the United Kingdom or abroad." The Committee is satisfied that Mr Nikolov was under a professional obligation to notify the GDC immediately of DCI's decision, given that although his registration was suspended, he was still registered with the GDC. It did not accept Mr Nikolov's contention, as set out in a record of a telephone call dated 21 August 2025 with a GDC employee, that he did not believe he should have informed the GDC since he was suspended indefinitely, has moved to another part of the world and was no longer practising dentistry." Witness 3's evidence, which was endorsed by that of Witness 4, was that the GDC first learnt of the DCI's decision as a result of a letter dated 13 March 2025 from the DCI to the GDC. Mr Nikolov did not disclose the matter himself. The Committee has accepted their evidence. Taking all these factors into account, the Committee finds this charge proved.
4	<i>Your conduct in charge 3 was</i>
4a	Misleading Found proved The Committee is satisfied that Mr Nikolov was under a duty to notify the GDC, in accordance with Standard 9.3.3. It is further satisfied that Mr Nikolov failure to inform the GDC of the DCI's decision (dated 4 October 2024) to remove him from the DCI's 'Register of Dentists' is objectively misleading since the GDC was unaware about his registration status with the DCI. In fact, had it not been for the fact that the DCI notified the GDC of Mr Nikolov's registration status, it would have been unaware of the extent of his registration status with the DCI. Taking all these factors into account, the Committee finds this charge proved.
4b	Lacking integrity Found proved The Committee is satisfied, on the balance of probabilities, that Mr Nikolov was aware of the DCI's decision given that a letter setting out its decision of 4 October 2024 was sent to his known address and by email on 7 October 2024. The email address for that letter is the same email address which Mr Nikolov has used in recent correspondence with the GDC. Further, Mr Nikolov had had two telephone conversations with the DCI regarding its investigation prior to the hearing in October 2024, so would have been aware that the matter was going to be considered by the DCI. The Committee finds that Mr Nikolov did not at any point notify the GDC of the DCI's decision (dated 4 October 2024) to remove him from their 'Register of Dentists'.

	The Committee considers that it was incumbent on Mr Nikolov, as a registered dentist, to make sure of his disclosure obligations to the GDC and to follow the high ethical standards expected of a registrant registered by the GDC. In applying the principles set out in <i>Wingate & Anor V Solicitors</i>, the Committee is satisfied that Mr Nikolov's conduct in withholding information from the GDC relating to his registration with the DCI constituted a lack of integrity and was a significant departure of the standards expected of a registered dentist.
4c	<i>Dishonest – in that you knew you were required to immediately inform the GDC of the DCI's decision</i> Found proved The Committee considers that Mr Nikolov would have been aware that he was required to notify the GDC immediately of the DCI's decision given that a decision was taken by a dental regulator in Ireland was likely to impact on his registration status with the GDC in the UK. This was particularly so given that the DCI had decided to remove his entry and registration on the Register due to non-disclosure. In his email to the GDC dated 8 September 2025 Mr Nikolov acknowledged the seriousness of the concerns regarding his registration with the DCI and took full responsibility for his action. The Committee has concluded that Mr Nikolov's failure to notify the GDC immediately of the DCI's decision was a deliberate act of concealment. He would have been aware that the DCI's decision may well have adverse implications for his registration with the GDC. The Committee further concluded, that Mr Nikolov's actions were objectively dishonest, applying the standards of ordinary decent people. Accordingly, the Committee finds this charge proved.

31. We move to stage 2 of the proceedings

Stage Two of the hearing

32. At this second stage of the hearing, the Committee has to consider whether the facts found proved amount to misconduct, and if so, whether Mr Nikolov's fitness to practise is currently impaired by reason of his misconduct. The Committee took into account that if it found current impairment on the statutory ground of misconduct, it would need to consider what sanction, if any, to impose on Mr Nikolov's registration. The Committee kept in mind the submissions made by Mr Stevens on behalf of the GDC in relation to these matters.

33. The Committee has accepted the advice of the Legal Adviser. The Committee has borne in mind that its decisions were for its independent judgement. The Committee is mindful that there is no burden or standard of proof at this stage of the proceedings.

34. In reaching its decisions, the Committee has considered all the evidence presented to it at the fact-finding stage. It received no further evidence at this second stage.

Mr Nikolov's fitness to practise history

35. Mr Stevens set out the chronology of Mr Nikolov's fitness to practise history before the GDC. At a hearing in April 2016 the PCC considered allegations against Mr Nikolov regarding the clinical care he provided to two patients – Patients A and B. The PCC found proved that Mr Nikolov's clinical

care of these two patients fell far below the accepted standards – they involved multiple failings in his treatment planning, radiographic practice and obtaining informed consent. The PCC found that the failings had persisted over a protracted period of time and were sufficiently serious to amount to misconduct. That PCC considered that there was insufficient evidence of any remedy or insight, noting the absence of any engagement by Mr Nikolov. In the PCC's judgement, there therefore remained a risk of repetition of the clinical matters. The PCC further found that Mr Nikolov's fitness to practise was impaired by reason of misconduct on the grounds of public protection as well as the wider public interests. The PCC directed that Mr Nikolov's registration be subject to a suspension order for a period of 12 months.

36. The PCC reviewed the order on 21 April 2017. It noted that Mr Nikolov had failed to meaningfully engage in the process. The PCC was not satisfied that the concerns had been adequately remedied. It determined that there was insufficient insight and remedy of the matters found proved. The PCC concluded that Mr Nikolov was not safe to practise unrestricted. It was satisfied that Mr Nikolov remained impaired and directed that the order of suspension be extended for a further period of 12 months.

37. The PCC again reviewed the suspension order on 28 April 2018. It concluded that given Mr Nikolov's non-engagement in the process and the lack of remedy of the clinical concerns, his fitness to practise remained impaired. Further, in light of Mr Nikolov's persistent non-engagement in those proceedings, the PCC decided to indefinitely suspend Mr Nikolov's registration, albeit he was still registered with the GDC.

Summary of the GDC's submissions

38. Turning to the matters found proved in this case, it was Mr Stevens' submission that this is a case involving extremely serious failings on the part of Mr Nikolov. They involved two deliberate acts of concealment in his dealings with two regulators – the DCI and the GDC. This was particularly serious given that there were two instances of dishonest conduct. Mr Stevens submitted that the findings are sufficiently serious to amount to misconduct, particularly in light of two separate findings.

39. Mr Stevens submitted that Mr Nikolov's dishonest conduct represents a serious departure of the GDC's '*Standards for the Dental Team*' (September 2013) and cited a number of standards which were applicable in this case, which included standard 1.3 which sets out that registrants must be honest and act with integrity. Mr Stevens submitted that Mr Nikolov's dishonest conduct not only damages his own reputation but also damages that of dental professionals.

40. Mr Stevens submitted that the dishonest conduct could have implications for patient safety in circumstances where, having been found by the GDC's PCC that Mr Nikolov posed a risk to patients, he applied for registration with another health regulator and knowingly failed to disclose his GDC history. Mr Stevens invited the Committee to have regard to the nature of the dishonesty in this case, which involved deliberate acts of concealment and but for the intervention of others who had carried out various checks, the concealment would have continued.

41. Mr Stevens drew the Committee's attention to the limited contact between Mr Nikolov and the GDC in August 2025 and September 2025 in relation to these proceedings. This included the email dated 8 September 2025 in which he acknowledged some wrongdoing. However, the GDC's position is that the Committee cannot be satisfied that this amounts to an in-depth thoughtful reflective piece upon which the Committee could conclude there is real evidence of insight and remedy. On behalf of the GDC, Mr Stevens submitted that there would be a real risk of repetition of the dishonest conduct which also engages the protection of patients in this case, and therefore Mr Nikolov's fitness to practise is currently impaired by reason of misconduct on the grounds of the protection of the public.

42. Mr Stevens further submitted that this is a case that demands a finding of current impairment on the grounds of the wider public interest given the serious nature of the dishonesty. He referred

the Committee to the relevant sections of the GDC's 'Guidance for the Practice Committees including Indicative Sanctions Guidance' (January 2026) (the PCC guidance) in support of his submissions.

43. Mr Stevens submitted that the most appropriate and proportionate sanction in the circumstances of this case would be that of erasure. He acknowledged that this sanction was the most severe but submitted that given the serious acts of dishonesty, which also brought risks of patient safety, any sanction less than erasure would not be sufficient to protect the public and the wider public interest. He also referred to the limited acceptance of wrongdoing and the absence of any other mitigating factors in this case. Mr Stevens also set out a number of aggravating factors.

Misconduct

44. The Committee has had regard to its factual findings. It has found proved that on or around 15 June 2017 as part of Mr Nikolov's application for registration with the DCI he signed a declaration confirming "that I have listed all regulatory bodies that I have ever been registered with in the past and present". However, Mr Nikolov did not list that he had been registered with the General Dental Council ('GDC') since June 2009. The PCC found that the conduct was misleading, lacking in integrity and dishonest in that he knew he was required to disclose his registration with the GDC as part of his DCI registration application. He would have been well aware that his registration with the GDC (which at the time of the application he was suspended by the PCC due to concerns about his clinical practice) may well have impacted on the DCI's decision in relation to his application for registration.

45. The DCI, unaware of Mr Nikolov's registration status with the GDC, accepted Mr Nikolov's application onto their register on 20 December 2017. It was not until further investigations were carried out by a potential employer that the matter of Mr Nikolov's registration status with the GDC became known to the DCI. Had that not been the case, there was a risk that Mr Nikolov could have worked as a dentist in Ireland in the knowledge that his registration was suspended by the GDC due to the significant and wide ranging failings in clinical care he had provided to two patients, which had amounted to misconduct.

46. The Committee also found proved that Mr Nikolov failed to immediately inform the GDC of the DCI's decision of 4 October 2024 to remove him from their Register of Dentists. The Committee concluded that Mr Nikolov's failure to notify the GDC immediately of the DCI's decision was misleading, lacking integrity and dishonest.

47. The Committee has had regard to the following paragraphs of the GDC's *Standards for the Dental Team* (September 2013) which it considers are relevant in this case:

1.3 *You must be honest and act with integrity.*

1.3.2 *You must make sure you do not bring the profession into disrepute.*

1.7 *You must put patients' interests before your own or those of any colleague, business or organisation.*

9 *You must make sure your personal behaviour maintains patients' confidence in you and the dental profession.*

9.1 *You must ensure that your conduct, both at work and in your personal life, justifies patients' trust in you and the public's trust in the dental profession.*

9.3.2 *You must inform the GDC immediately if you are subject to the fitness to practise procedures of another healthcare regulator, either in the United Kingdom or abroad.*

9.3.3 *You must inform the GDC immediately if a finding has been made against your registration by another healthcare regulator, either in the United Kingdom or abroad.*

48. The Committee considers that Mr Nikolov's dishonest conduct on two separate occasions, and in relation to his regulatory bodies, fell far short of the standards reasonably expected of a dentist. In the Committee's judgement, the conduct was deliberate, calculated and in respect of his failure to disclose his registration with the GDC as part of his DCI registration application, was so that he could work in Ireland. He would know, in light of the PCC's findings against him, which relate to patient safety concerns, that he was putting patients at risk were he to practise as a dentist in Ireland unrestricted. It was not a momentary lapse of judgement where he promptly admitted his wrong doing. The matters only came to light as a result of investigations by a third party (in relation to the DCI matter) and following notification by the DCI to the GDC (in relation to the DCI's decision of October 2024).

49. The Committee is in no doubt that Mr Nikolov's two acts of concealment in the context of his dealings with his regulatory bodies is very serious. It has had regard to paragraph 83 of the GDC's guidance which states

"Failure to inform the GDC immediately of criminal proceedings or a regulatory finding is a serious matter. That is because failure to declare information about criminal proceedings or regulatory findings deprives the Registrar of the ability to consider the impact of those proceedings on the registrant's fitness to practise, and whether any action (including on an interim basis) needs to be taken to protect the public or the wider public interest. As a result, failure to declare criminal or regulatory proceedings has the potential to undermine the integrity of the register."

50. Taking all these matters into account, the Committee is satisfied that the facts found proved are serious and amount to misconduct

Decision on current impairment

51. The Committee next considered whether Mr Nikolov's fitness to practise is currently impaired by reason of his misconduct. In doing so, it had regard to the over-arching objective of the GDC, which is: the protection, promotion and maintenance of the health, safety, and well-being of the public; the promotion and maintenance of public confidence in the dental profession; and the promotion and maintenance of proper professional standards and conduct for the members of the dental profession.

52. The Committee considers that dishonest conduct is attitudinal in nature and is unlikely to be capable of being remedied. The Committee has considered Mr Nikolov's responses to the allegations, as set out in his email dated 8 September 2025. In that email he sets out as follows: *"I fully acknowledge and understand the seriousness of the concerns raised regarding my registration with the Dental Council of Ireland and my disciplinary history with the General Dental Council. I regret the omission of my UK registration details in my 2017 application to the Dental Council of Ireland and accept the regulatory findings. I take full responsibility for my actions and confirm that I will not seek to practise dentistry in the UK or Ireland in the future. My intention is to fully cooperate with the General Dental Council."*

53. The Committee is not satisfied that this statement amounts to a thoughtful reflective piece upon which it could conclude that Mr Nikolov has demonstrated any insight or set out how he would behave differently in the future. Further, although Mr Nikolov has stated that he will co-operate with the GDC, he has not engaged with the GDC in these proceedings since sending that email.

54. In the absence of any evidence of remediation and the concern regarding Mr Nikolov's lack of insight into serious matters relating to his honesty, the Committee concluded that there is a risk of

repetition in relation to the misconduct identified. The Committee considered that a finding of impairment is required on public protection grounds.

55. Turning to the wider public interest, the Committee is of the view that dentists occupy a position of privilege and trust and must make sure that their conduct at all times justifies both their patients' and the public's trust in the profession. In this regard the Committee had regard to the approach to determining the issue of current impairment formulated by Dame Janet Smith in her Fifth Report from Shipman.

56. The Committee is satisfied that in light of its findings, a reasonable and informed member of the public would be alarmed if a finding of impairment were not made in relation to a dentist who was involved in two pre-meditated acts of dishonesty in the context of their dealings with two dental regulators. Mr Nikolov's actions in seeking registration with the DCI in the knowledge that he had regulatory findings against him by the GDC, and choosing not to disclose them, placed patients at potential risk of harm, has brought the profession into disrepute and breached fundamental tenets of the profession. This was compounded by his deliberate failure to notify the GDC of the DCI's decision to remove him from their Register of Dentists. The Committee has therefore concluded that public confidence in the dental profession would be seriously undermined in the absence of a finding of current impairment. It also took into account the need to uphold proper professional standards of conduct and behaviour.

57. Accordingly, the Committee determined that Mr Nikolov's fitness to practise is currently impaired by reason of his misconduct.

Decision on sanction

58. Having found Mr Nikolov's fitness to practise to be impaired by reason of his misconduct, the Committee considered what sanction, if any, to impose on his registration. It has borne in mind that the purpose of a sanction is not to be punitive, although it may have that effect, but to protect the public and uphold the wider public interest. The Committee had regard to the GDC's 'Guidance'. It has applied the principle of proportionality, balancing the public interest with Mr Nikolov's own interests.

59. The Committee identified what it considered to be the mitigating and aggravating factors in this case. In mitigation, the Committee took account of the following:

- Evidence of limited acknowledgment of wrongdoing.

60. The Committee identified the following aggravating factors:

- Potential risk of harm to patients.
- Premeditated misconduct.
- Financial gain by the registrant.
- Misconduct sustained or repeated over a period of time.
- Lack of insight.
- Previous fitness to practise history.

61. Taking all the above factors into account, the Committee considered the available sanctions, starting with the least restrictive. The Committee noted that it was open to it to conclude this case without taking any action in respect Mr Nikolov's registration or to issue him with a reprimand. However, given the serious nature of his dishonest conduct, and the identified risk of repetition, the Committee concluded that taking no action or issuing a reprimand would not protect the public, nor would it satisfy the wider public interest.

62. The Committee next considered whether to impose conditions on Mr Nikolov's registration. It decided that conditions would not address the concerns in this case, which relate to Mr Nikolov's

behaviour and attitude. Furthermore, given the seriousness of the dishonesty in this case, which involved two separate episodes of deliberate concealment, the Committee concluded that a conditions of practice order would not be sufficient to protect the public, nor would it satisfy the wider public interest.

63. The Committee went on to consider whether to suspend Mr Nikolov's registration for a specified period. In doing so, it had regard to paragraph 277 of the Guidance which states that:

Suspension may be appropriate when all, or some, of the following factors are present:

- a. There is evidence of repetition of the behaviour.*
- b. The registrant has not shown insight into the issues which led to a finding of current impairment being made, and/or poses a significant risk of repeating the behaviour.*
- c. A lesser sanction would be insufficient to meet the public interest.*
- d. There is no evidence of harmful deep-seated personality or professional attitudinal problems (which might make erasure the appropriate order).*

64. The Committee has concluded that factors a to c apply in this case and that there is also evidence of harmful deep-seated personality or professional attitudinal problems (factor d).

65. The Committee had regard to the serious findings in relation to the dishonesty. It took account of paragraph 282 of the Guidance which deals with erasure. It identified the following factors as being relevant:

- *The findings include serious departure(s) from the relevant professional standards.*
- *Where a continuing risk of serious harm to patients, colleagues, or other persons is identified.*
- *Where the findings include serious dishonesty, particularly where persistent or covered up.*
- *Where there is a persistent lack of insight into the seriousness of actions or their consequences.*
- *A lesser sanction would be insufficient to meet the public interest.*

66. The Committee considers that Mr Nikolov has shown a blatant disregard of the GDC in relation to its function and processes and the requirement of all dental professionals to adhere to relevant standards which are there to protect the public and maintain public confidence in the profession. It has kept in mind the extremely limited evidence from Mr Nikolov as to the seriousness of his wrongdoing. Furthermore, the Committee has had regard to Mr Nikolov's previous fitness to practise history with the GDC and his lack engagement and rectification of the concerns in those proceedings.

67. Having taken all the matters in this case into account, the Committee concluded that a period of suspension, even for the maximum period of 12 months, would not be sufficient to protect the public and the wider public interest. There was no evidence before the Committee to suggest that any period of suspension would result in any meaningful change in Mr Nikolov's position or level of insight.

68. The Committee determined that the only appropriate and proportionate sanction is erasure. It is satisfied that Mr Nikolov's dishonest behaviour and the calculated manner in which he attempted to join another dental register by concealing his GDC history is incompatible with being a registered dentist. Unless Mr Nikolov exercises his right of appeal, his name will be erased from the Register for Dentists 28 days from the date that notice of this Committee's direction is deemed to have been served upon him.

69. The Committee will now invite submissions from Mr Stevens as to whether to make an immediate order of suspension on Mr Nikolov's registration.

Decision on an immediate order

70. The interim order of suspension on Mr Nikolov's registration in respect of these matters is hereby revoked.

71. The Committee went on to consider whether to impose an immediate order of suspension on Mr Nikolov's registration. In so doing, the Committee took account of Mr Stevens' application that such an order should be imposed. He submitted that the ongoing risk of repetition identified by the Committee means that an immediate order is necessary for the protection of the public and to uphold public confidence in the dental profession.

72. Mr Stevens acknowledged that Mr Nikolov's registration is currently indefinitely suspended by virtue of another PCC direction. However, he made the point that this Committee has no jurisdiction over that order. Theoretically it was open to Mr Nikolov to have that indefinite suspension order reviewed during the 28 day appeal period. Mr Stevens therefore invited the Committee to make an immediate order of suspension.

73. The Committee accepted the advice of the Legal Adviser, who drew its attention to the Guidance and outlined the statutory test for imposing immediate orders.

74. The Committee determined that the imposition of an immediate order of suspension on Mr Nikolov's registration is necessary for the protection of the public and is otherwise in the public interest.

75. In its substantive determination, the Committee has identified a risk of repetition of the dishonest conduct. In the circumstances, the Committee considers that it would be inconsistent not to impose an immediate order for the protection of the public.

76. The Committee is also satisfied that an immediate order is required in the wider public interest, in view of the gravity of the matters found proved. It considered that immediate action is necessary in this case to maintain public confidence in the dental profession and the regulatory process, and to uphold proper professional standards of conduct and behaviour.

77. The Committee took into account that in the absence of an immediate order, Mr Nikolov could, if he wished to do so, appeal against the Committee's decision in relation to this matter

78. The effect of the foregoing substantive determination and this order is that Mr Nikolov's registration will be suspended to cover the appeal period. Unless Mr Nikolov exercises his right of appeal, the substantive direction for erasure will take effect 28 days from the date of deemed service.

79. Should Mr Nikolov exercise his right of appeal, this immediate order will remain in place until the resolution of the appeal.

80. That concludes this determination.