

HEARING HELD IN PUBLIC**Professional Conduct Committee
Review Hearing****11 September 2026****Name:** GRZELCZAK, Hanna Izabela**Registration number:** 175203**Case number:** CAS-209290-B6W2Q6

General Dental Council: James Halliday, Counsel
Instructed by Holly Watt, IHLPS**Registrant:** Present
Not Represented

Outcome: Fitness to practise no longer impaired. Suspension revoked

Committee members: Chris Weigh (Chair, Lay Member)
Katarzyna Richards (Dental Care Professional Member)
Sukhninder Sandhar (Dentist Member)**Legal Adviser:** Matthew Corrie**Committee Secretary:** Lola Bird

Ms Grzelczak,

1. This is a resumed hearing before the Professional Conduct Committee (PCC), pursuant to section 27(C) of the *Dentists Act 1984 (as amended)* ('the Act').
2. The hearing is being conducted remotely by Microsoft Teams video-link.
3. You are representing yourself at these proceedings. The Case Presenter for the General Dental Council (GDC) is Mr James Halliday, Counsel.
4. The purpose of this hearing has been for the Committee to review a substantive order of suspension currently in place on your registration. The suspension order was imposed by the High Court on 17 April 2026 for a period of six months. This was following your successful appeal against the original decision of erasure made by a PCC ('the initial PCC') in September 2025. In substituting the initial PCC's decision of erasure with the six-month suspension order, the High Court Judge directed that a review of the order take place before its expiry, hence these proceedings today.

Summary of the case background

5. This case was first considered by the initial PCC at a hearing which took place from 22 to 24 September 2025. You were present at that hearing and legally represented. That Committee considered allegations brought against you by the GDC, all of which you admitted, relating to emails that you sent to former colleagues in August and September 2023. You sent the emails in the context of asking for your name to be removed from your former dental practice's website and online booking systems. You had resigned from that dental practice ('the Practice') in June 2023.
6. The factual matters that you admitted at the hearing in September 2025, and which the initial PCC found proved by way of your admissions were that:
 - On 25 August 2023 you sent Person A an email in which you stated: *"I don't want to be connected to Indian dentistry"*.
 - On 26 August 2023 you sent Person A an email in which you stated: *"I am not Indian I provide German quality. It is a huge difference"*.
 - On 21 September 2023 you sent Person A an email in which you stated: *"I noticed my name Hann Grzelczak dentist In Google is connected with [redacted] practices. I feel low with this connection as [redacted] is nhs low quality service and this is indian company! It is a shame to me"*.
 - On 22 September 2023 you sent Person B an email in which you stated: *"Please remember I don't provide Indian implants. I provide German technology"*.
7. You also admitted, and the initial PCC found proved, that those communications sent by you to Person A and Person B were unprofessional, inappropriate and racially motivated.

8. The initial PCC went on to determine that the facts admitted and found proved amounted to misconduct which, through your legal representative, you accepted was the case. The initial PCC stated in its decision on misconduct that:

“In light of the findings of fact that it has made, the Committee has little difficulty in determining that the proven facts amount to misconduct. Your misconduct was sustained and repeated across four emails sent over a period of approximately four weeks. Each of these separate emails was unprofessional, inappropriate and, most seriously, racially motivated. The Committee considers that your conduct was a serious falling short of, and a particularly egregious departure from, the standards reasonably to be expected of a registered dentist. In the Committee’s judgement your conduct would be viewed as deplorable by your fellow practitioners. Your conduct was a breach of a fundamental tenet of the profession, namely the need to treat others with respect and not bring the profession into disrepute.”

9. In determining that your fitness to practise was impaired by reason of your misconduct, which you also accepted was the case, the initial PCC stated that:

“Having taken the evidence that you have provided into consideration, the Committee considers that, whilst your misconduct is in theory capable of being remedied, your fitness to practise is currently impaired by reason of misconduct. The Committee recognises that English is not your first language, and that you have endeavoured to answer the questions asked of you to the best of your ability. However, whilst you have demonstrated some insight into your misconduct, the Committee has concluded that this insight can only properly be described as limited. Similarly, whilst the Committee notes that you have taken some steps to attempt to remedy your misconduct, the Committee finds that these steps are minimal.

The Committee is mindful that you came before it making full admissions to the heads of charge that you face, and that you have also accepted that your conduct amounts to misconduct, and that your fitness to practise is currently impaired. These admissions and concessions connote a degree of understanding of your wrongdoing.

When looking at the extent and depth of your insight, the Committee considers that you do not appear to have a proper, thoroughgoing and longstanding appreciation of the very serious nature of your misconduct. In the Committee’s judgement you have not engaged properly with the nature of your misconduct, in that you have sought to downplay your culpability by referring to your comments as, for instance, ‘illogical’, ‘nonsense’ and ‘silly’. In the Committee’s judgement you have not demonstrated that you fully understand just how offensive your comments were, and the likely effect that they would have on the public’s perception of, trust and confidence in the profession as a whole and you in particular. The Committee is cognisant that a period of two years has elapsed since you made the comments in question, and in its judgement you have therefore had a considerable period of time in which to develop proper insight. The Committee has had regard to the evidence that you provided about the pressures that you were facing at the relevant times, but in its judgement you have provided little in the way of a coherent explanation for why you used racially motivated language. Instead, in the Committee’s judgement, you have sought to disassociate

yourself from your behaviour rather than take responsibility for it. The resulting lack of insight into the nature, gravamen and implications of your misconduct means that the Committee cannot be satisfied that a risk of you repeating your misconduct is highly unlikely. Your lack of insight is mirrored by, and is no doubt likely to have resulted in, shortcomings in your remediation.

In the Committee's judgement you pose a risk to the public on account of the shortcomings in your insight and remediation. The Committee considers that you are liable to repeat your misconduct, and that such a repetition entails a risk of harm to a person or persons who could receive racially motivated communications from you in the future. The Committee is not satisfied that you would respond more optimally if faced with similar or different pressures in the future, and in reaching this conclusion it is again particularly mindful of your apparent lack of understanding of the nature, seriousness and implications of your misconduct.

The Committee considers that a finding of impairment is also, and undoubtedly, required to maintain public confidence in the profession and to declare and uphold proper professional standards of conduct and behaviour. In the Committee's judgement the public's trust and confidence in the profession, and in the regulatory process, would be significantly undermined if a finding of impairment was not made given the serious nature of your misconduct. In the Committee's judgement you have in the past breached a fundamental tenet of the profession and have brought the profession into considerable disrepute. Put simply, the public should expect that no registrant would ever use racially motivated language in such circumstances. Accordingly, the Committee finds that a declaration of impairment is further required with regard to public interest considerations."

10. As outlined in its decision, the initial PCC considered that you lacked a proper understanding of the nature, seriousness and implications of your misconduct, and that you had not demonstrated sufficient insight into, or remediation of, conduct which was so damaging to your fitness to practise. The initial PCC concluded that *"your misconduct, and your lack of a proper understanding of it, is fundamentally incompatible with continued registration..."*. Accordingly, it determined to erase your name from the Dentists Register.

Your appeal to the High Court

11. You successfully appealed the initial PCC's decision and on 17 April 2026, the High Court handed down its judgment that the direction for erasure should be substituted with a lesser sanction, namely the suspension of your registration for a period of six months, with a review.

12. The Judge who considered your appeal stated the following in his judgment:

"My own assessment of Ms Grzelczak's emails is that whilst they were plainly offensive, inappropriate and racially motivated, they do not approach the level of conduct that would give rise to a risk of serious harm of the kind contemplated in the Sanctions Guidance for a sanction of erasure. The four emails consisted of disparaging and racially motivated remarks directed at an organisation and at administrative staff, expressing a wish not to be associated

with “Indian dentistry”, describing [the Practice] as an “Indian company”, referring to “Indian implants”, and asserting that “Indian should share money with Indian.”

Such comments represented a serious departure from the professional standards. However, they were confined to written communications sent to administrative staff at [the Practice] and did not directly threaten or personally target those individuals with abuse. The emails did not involve patients, nor give rise to any immediate risk to patient safety, clinical care, or the physical or psychological wellbeing of others. Whilst they had the potential to cause some distress and harm, their gravity lies in their unprofessional and racially motivated nature rather than in any potential to cause serious harm.”

13. In relation to what the appropriate, necessary and proportionate sanction should be in the circumstances of your case, the Judge stated:

“Taking all of these matters together, a fair and balanced application of the Sanctions Guidance, informed by relevant authority, leads me to conclude that a period of suspension is capable of addressing the public protection and public interest concerns raised by Ms Grzelczak’s misconduct. Erasure would therefore have been excessive and disproportionate. The threshold for erasure is met only where the misconduct has caused serious harm or presents a continuing risk of serious harm, or where the behaviour is so fundamentally incompatible with continued registration that no lesser sanction will suffice. That would include, for example, cases where the attitudinal concern is entrenched or irremediable. This is not such a case.

In my judgment, a period of suspension is both appropriate and necessary in the public interest. Suspension is expressly contemplated by the Sanctions Guidance in circumstances where there is evidence of repetition of the behaviour and where a registrant has not shown insight. It is a sanction that will mark the seriousness of the misconduct, uphold professional standards, and provide an opportunity for Ms Grzelczak to demonstrate continued remediation.

...I consider that a period of suspension of 6 months, taking effect on the determination of this appeal, is justified and proportionate. The misconduct was serious, racially motivated and repeated. A shorter period would not afford sufficient opportunity for Ms Grzelczak to undertake meaningful remediation or adequately reflect the gravity of the misconduct for the purposes of maintaining public confidence and upholding proper professional standards. Given the attitudinal concerns identified and the limited insight demonstrated to date, this suspension will be subject to a review hearing at its conclusion.

At the review hearing, Ms Grzelczak will need to provide further evidence demonstrating that she has maintained and built upon the remediation already begun. That evidence should include continued completion of CPD addressing issues of discrimination, respectful communication and professional behaviour, with accompanying reflective learning. Ms Grzelczak should also provide a substantive and updated reflection statement demonstrating insight into her misconduct, its impact on public confidence, and how she will avoid repetition in the future.”

Today's resumed hearing

14. It has been the task of this Committee to review the substantive order of suspension imposed on your registration by the High Court in April 2026.

15. The evidence before the Committee at this review included the material you submitted as part of your 'GDC Review Portfolio'. In your portfolio, you provided, among other things, your written reflections on the matters in this case, and evidence of your Continuing Professional Development (CPD). You also gave oral evidence to the Committee today.

16. The Committee first heard from Mr Halliday, who set out the background to this case, as summarised above, and made submissions on behalf of the GDC in respect of the review. In his submissions, Mr Halliday stated that, at these proceedings, it was for you to demonstrate that your fitness is no longer impaired. He acknowledged that you have provided a substantial bundle of documentation detailing your numerous efforts in dealing with the issues raised in this case.

17. Mr Halliday told the Committee that the GDC was neutral as to whether your fitness to practise remains impaired. He submitted that it was for the Committee to decide, having considered your evidence, whether you have developed sufficient insight such that you can return to practise without any restriction on your registration.

18. The Committee next heard from you. You gave oral evidence under affirmation, during which you told the Committee that you accepted responsibility for the words that led to your misconduct. You also accepted that what you said in those communications to your former colleagues was racially motivated, unacceptable and unprofessional. You stated that when you sent those emails, you had been very focused on yourself and the legal issues that you were experiencing at the time.

19. You acknowledged that, previously, your insight into your misconduct was limited. You stated that the High Court appeal was a turning point for you, in terms of fully understanding what you needed to do to address your wrongdoing. You stated that through further CPD and a long period of learning you have had time to reflect on your misconduct. You spoke about the unacceptable and inappropriate nature of your communications, their impact, including the distress they caused to the individuals who received them, and the wider implications of your actions on public confidence in the dental profession.

20. You said that you had worked hard, and you explained to the Committee what you have since done to address the serious concerns raised about your attitude and behaviour. You stated that you now have safeguards and mechanisms in place to avoid repetition. You told the Committee how you now pause, think and take advice, rather than sending communications immediately, particularly in situations where you perceive yourself to be "*emotionally agitated*". You stated that you understand that merely avoiding the use of such words again is superficial, and so as part of your learning you have gone further to recognise your triggers, challenge your assumptions and to be aware of stereotypes. You stated that this had initially been difficult, but your understanding of these issues has become stronger over time. You said that you now recognise that professionalism includes your attitude and communications with everyone, both inside and outside the context of clinical practice. You told the Committee that your learning and knowledge is "*very deeply embedded in your mind*".

Also, that you intend to continue your CPD and personal development on the matters highlighted in this case.

21. Following your oral evidence, Mr Halliday made brief closing submissions on behalf of the GDC, reiterating the neutrality of the Council in this matter. He submitted that your current fitness to practise was a matter for the Committee's judgement.

22. In your closing submissions to the Committee, you stated that you wished to make clear that you do not minimise your past misconduct, and that you take what you did very seriously. You asked the Committee to consider the positive approach you have taken to change, and how you have implemented your learning in all areas of your life. You reiterated your intention to continue your CPD, personal development and the seeking of feedback from colleagues. You invited the Committee to consider the evidence of your remediation and to conclude that your fitness to practise is not currently impaired.

The Committee's decision

23. In comprehensively reviewing the suspension order today, the Committee considered all the evidence placed before it, including your oral evidence. It also took account of the submissions made by Mr Halliday on behalf of the GDC and your submissions.

24. The Committee accepted the advice of the Legal Adviser in relation to its powers at this review, as set out under section 27C(1) of the Act, the approach it should take in conducting its review and the applicable legal principles and guidance. The Committee took into account that the persuasive burden rested with you at these review proceedings to demonstrate that you have addressed your past impairment.

25. The Committee exercised its independent judgement. It bore in mind the overarching 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. The Committee also had regard to the GDC's '*Fitness to Practise: Guidance for the practice committees (Effective from 6 January 2026)*'.

26. It was the view of the Committee, having considered your evidence in the round, that you have made substantial and targeted efforts in addressing the concerns featured in this case. The Committee found the quality of your remediation evidence to be high, particularly noting the detailed written self-reflections you provided for this review. It noted from your main self-reflections the remorse you express for your misconduct stating that *"I acknowledge that some of my emails contained regrettable and offensive language. However, it was never my intention to discriminate or offend anyone. These emails were a result of extreme personal and professional stress, and I realize that my emotions clouded my judgment... I deeply regret any confusion or harm caused by my expression of frustration and apologize for it"*. The Committee noted from your evidence that you apologise for your actions in several different places in your reflections and in several different ways.

27. The Committee also had regard to the evidence of your detailed and comprehensive CPD, some of which has been verified externally by course tutors, such as your completion of the

Practitioner Advice and Support Scheme (PASS). The Committee noted that this was a six-month programme specifically aimed at the concerns identified about you. It also took into account your completion of a number of other courses, including in relation equality, diversity and inclusion, professional communication, professionalism and conflict management. Whilst the Committee noted your oral evidence regarding the High Court appeal being the turning point in your understanding, it took into account that you have been undertaking relevant CPD over a number of years since the matters in this case arose, with your learning and reflection continuing into August 2026. The Committee noted your additional written reflections dated 22 August 2026 on the GDC Standards.

28. In considering your oral evidence, the Committee took into account that English is not your first language. Nonetheless, it found that you explained yourself well and that what you told the Committee was consistent with the documentation you provided. The Committee considered that you were clear in recognising what you said in your communications to your former colleagues was wrong and totally unacceptable. In answer to a question from the Committee specifically regarding the racially motivated nature of those emails, you acknowledged the distress your words would have caused the recipients and others at the Practice. You also spoke about the wider implications of your conduct, including in relation to the reputation of the dental profession and the potential that patients, knowing what you wrote in the emails, may not feel safe and secure in you being their treating dentist. The Committee noted your oral evidence that you do not regard yourself as someone with a deep discriminatory attitude and that you regret that correspondence you sent.

29. Having taken into account both your oral and written evidence, the Committee was satisfied that you have demonstrated genuine insight and remorse for your misconduct. It considered that you have taken a lot of time and effort to understand how you needed to address your serious falling short of your professional standards and that you have satisfactorily adhered to the directions of the High Court Judge regarding the evidence to be provided for this review. The Committee considered that your focused and comprehensive approach to your remediation has enabled you to progress to where you are today. It was reassured by all that it has seen and heard, that there has been a real and positive change in your attitude.

30. In all the circumstances, the Committee concluded that the likelihood of repetition in this case is low. It therefore considered that a finding of current impairment on public protection grounds is not necessary. The Committee was satisfied that there are no ongoing public safety concerns arising from this case.

31. The Committee went on to consider whether a finding of impairment is required in the wider public interest, to maintain public confidence in the dental profession and to uphold proper professional standards and conduct. In doing so, the Committee considered whether a fully informed member of the public, aware of all the aspects of this case, would expect such a finding. It was the judgement of the Committee that such a member of the public would take into account the evidence of your remorse, your insight the significant steps you have taken towards remediation, and they would not require a finding of impairment to be made. The Committee also considered that members of the public would take into account that your registration has already been suspended for a substantial period of time, including for a period before your appeal. Accordingly, the Committee concluded that public confidence in the profession, and the maintenance of professional standards would not be undermined if a finding of impairment were not made today.

32. The Committee therefore determined that your fitness to practise is no longer impaired by reason of your misconduct. It directs that the substantive suspension order currently in place on your registration should be revoked forthwith, allowing you to return to unrestricted practice.

33. That concludes this determination.