

PUBLIC HEARING

Professional Conduct Committee Review Hearing

29 April 2026

Name: STAMOULIS, Athanasios

Registration number: 80390

Case number: CAS- 193787-Y6S9G5

General Dental Council: Peta-Louise Bagott, Counsel.
Instructed by Georgina Mayles, IHLPS

Registrant: Not Present
Unrepresented

Fitness to practise: Impaired by reason of misconduct

Outcome: Suspension extended (with a review)

Duration: Six months

Committee members: Val Evans (Lay) (Chair)
James Maughan (Dentist)
Soheila Asabi (Dental Care Professional)

Legal adviser: Helen Gower

Committee Secretary: Andrew Keeling

1. This was a review hearing before the Professional Conduct Committee (PCC) in accordance with Section 27C of the Dentists Act 1984 (as amended) ('the Act'). The purpose of this hearing was for this PCC to review Mr Stamoulis' case and determine what action to take in relation to his registration.
2. Mr Stamoulis was neither present nor represented at this hearing. Miss Peta-Louise Bagott, Counsel appeared on behalf of the General Dental Council (GDC). The hearing was held remotely on Microsoft Teams.
3. This case (reference number: CAS-1937877) was considered at the same hearing as another, separate case which has also given rise to a substantive direction of suspension for Mr Stamoulis. That case bears the reference number CAS-205058. Separate consideration has been given to each case, and separate determinations have been produced. This determination relates solely to the case bearing the reference number CAS-193787.
4. The Committee first considered the issues of service of the notice of hearing and whether to proceed with the hearing in the absence of Mr Stamoulis. The Committee accepted the advice of the Legal Adviser on both of these matters as to the provisions of the Rules and the approach it should take to its decision.

Preliminary Matter

Decision on Service of the Notice of Hearing

5. The Committee first considered whether notice of the hearing had been served on Mr Stamoulis in accordance with Rules 28 and 65 of the GDC's Fitness to Practise Rules 2006 ('the Rules') and Section 50A of the Dentists Act 1984 (as amended) ('the Act'). The Committee received from the GDC an indexed hearing bundle, which contained a copy of the Notice of Hearing ('the notice'), dated 18 March 2026, thereby complying with the 28-day notice period. The hearing bundle also contained a Royal Mail 'Track and Trace' receipt confirming that the notice was sent to Mr Stamoulis' registered address by Special Delivery. A copy of the notice was also sent by first-class post and emailed to Mr Stamoulis on 18 March 2026.
6. The Committee was satisfied that the notice sent to Mr Stamoulis contained proper notification of today's hearing, including its time, date and that it will be taking place remotely, and the other prescribed information including notification that the Committee had the power to proceed with the hearing in Mr Stamoulis' absence.
7. On the basis of the information provided, the Committee was satisfied that notice of the hearing had been served on Mr Stamoulis in accordance with the Rules and the Act.

Decision on Proceeding in the Registrant's Absence

8. The Committee next considered whether to exercise its discretion under Rule 54 of the Rules to proceed with the hearing in the absence of Mr Stamoulis. The Committee approached the issue of proceeding in absence with the utmost care and caution. The Committee took into account the factors to be considered in reaching its decision, as set out in the cases of *R v Jones [2003] 1 AC 1HL* and the *General Medical Council v Adeogba [2016] EWCA Civ 162*. It remained mindful of the need to be fair to both Mr Stamoulis and the GDC, taking into account the public interest and Mr Stamoulis' own interests in the expeditious review of the substantive order of suspension imposed.
9. The Committee first concluded that all reasonable efforts had been taken to send the notification of hearing to Mr Stamoulis in accordance with the Rules. The Committee noted that Mr Stamoulis subsequently emailed the GDC on 8 and 15 April 2026 and stated that he would not be attending the hearing as it was taking place on a working day and therefore not convenient for him owing to his work commitments. He stated that he was only available to attend a hearing if it was held on a Saturday. In response, the GDC emailed on 16 April 2026 to inform Mr Stamoulis that hearings only took place during the working week (Monday to Friday), but that he could provide the Committee with any written representations and any documents relevant to the review of the suspension order if he wished.
10. The Committee did not receive any request for an adjournment from Mr Stamoulis and it has not received any information from him in respect of this hearing. It considered that adjourning the hearing would be unlikely to secure Mr Stamoulis' attendance given his intention only to attend a hearing if it were held on a Saturday. The Committee concluded therefore that he had voluntarily absented himself from today's hearing. In these circumstances, the Committee determined that it was fair and appropriate to proceed with the hearing in the absence of Mr Stamoulis.

Background

11. In October 2020, the PCC held a hearing of inquiry in relation to allegations about Mr Stamoulis' fitness to practise. The Committee heard, and found proved, allegations relating to the standard of care and treatment of two patients, who were referred to for the purposes of those proceedings as Patient A and Patient B, in the overall period of April 2017 to November 2018. The Committee determined that the threshold for misconduct was met in relation to, as addressed to Mr Stamoulis:

[...] Your radiographic failings, the resultant failings in treatment planning and informed consent, and your record keeping failings in Patient A's case, as well as your omission in not taking intra-operative radiographs or using an electronic apex locator in Patient B's case.'

12. That Committee went on to determine that Mr Stamoulis's fitness to practise was impaired by reason of his misconduct. In reaching this finding the Committee determined that Mr Stamoulis had not provided any evidence of remediation of his misconduct, and had demonstrated only limited insight. As well as determining that Mr Stamoulis posed a risk to the public, the Committee also determined that a finding of impairment was also required in the wider public interest. The Committee determined that the appropriate sanction was one of conditions for a period of 12 months, with a review hearing to take place prior to the end of that period of conditional registration.
13. The PCC reviewed the direction of conditions at a hearing that took place on 22 October 2021. That reviewing Committee determined that Mr Stamoulis's fitness to practise remained impaired with regard to public protection and the wider public interest, and that it would be appropriate to extend and vary the conditions to which his name was subject for a further 12 months, again with a review hearing to take place prior to the end of that extended period of conditional registration.
14. The PCC reviewed the direction of conditions at a hearing that took place on 28 October 2022. That reviewing Committee determined that Mr Stamoulis's fitness to practise remained impaired with regard to public protection and the wider public interest, and that it would be appropriate to replace the direction of conditions with a direction of suspension for a period of nine months, again with a review hearing to take place prior to the end of that period of suspended registration.
15. The PCC reviewed the direction of suspension at a hearing that took place on 3 August 2023. That reviewing Committee's determination was subsequently quashed with the agreement of parties on application to the High Court, and the matter was remitted back to the PCC for a review hearing.
16. The PCC reviewed the direction of suspension at a hearing that took place on 4 and 5 December 2023. That reviewing Committee determined that Mr Stamoulis's fitness to practise remained impaired with regard to public protection and the wider public interest, and that it would be appropriate to replace the direction of suspension with one of conditions for a period of 12 months, again with a review hearing to take place prior to the end of that extended period of conditional registration.
17. The PCC reviewed the direction of conditions at a hearing that took place on 26 April 2024. That reviewing Committee determined that Mr Stamoulis' fitness to practise remained impaired with regard to public protection and the wider public interest, and that it would be appropriate to replace the direction of conditions with a direction of suspension for a period of six months, again with a review hearing to take place prior to the end of that extended period of suspended registration.
18. The suspension was next reviewed by the PCC on 17 October 2024. That reviewing Committee determined that Mr Stamoulis's fitness to practise remained impaired with regard to both public protection and wider public interest considerations, and that it would be appropriate to extend the direction of suspension for a further period of nine

months, again with a review hearing to take place prior to the end of that extended period of suspended registration.

19. The suspension was next, and most recently, reviewed by the PCC on 17 July 2025. That reviewing Committee determined that Mr Stamoulis's fitness to practise remained impaired with regard to both public protection and wider public interest considerations, and that it would be appropriate to extend the direction of suspension for a further period of nine months, again with a review hearing to take place prior to the end of that extended period of suspended registration. In so doing the PCC suggested that a future reviewing Committee may be assisted by:

- *'His attendance at the review hearing;*
- *A focused, concise and personal reflective statement which demonstrates that he has a full understanding of the impact his actions have had on Patient A and Patient B and on public confidence in the profession, and how he intends to change his practice in the future to prevent any repetition of the concerns;*
- *An updated and detailed PDP addressing the areas of concern which led to the finding of misconduct, including but not limited to radiographic practice, treatment planning, informed consent, record-keeping and prescribing practices.*
- *Evidence of completion of targeted CPD relevant to the issues referred to above; and*
- *Evidence of having kept his clinical knowledge and skills up-to-date.'*

Today's Review

20. It was the role of the Committee today to undertake a comprehensive review of this case. In so doing, the Committee had careful regard to all the documentary evidence before it and took account of the submissions made by Miss Bagott, who addressed the Committee separately in respect of each of the two cases. No written submissions or documentary evidence was received from, or on behalf of, Mr Stamoulis. The Committee also heard and accepted the advice of the Legal Adviser. The Committee had regard to the GDC's document, *'Fitness to Practise: Guidance for the practice committees'* (effective from 6 January 2026) (*"the GDC's Guidance"*).

21. Miss Bagott took the Committee through the background to the case. She submitted that the burden was on Mr Stamoulis to persuade the Committee that his fitness to practise was no longer impaired. However, she submitted that there has been no material change since the previous review hearing in July 2025. She submitted that there has been no evidence from Mr Stamoulis of remediation, such as a reflective statement showing that he appreciated the gravity of his misconduct, a Personal Development Plan (PDP), Continuing Professional Development (CPD) courses undertaken or targeted learning. Furthermore, she submitted that Mr Stamoulis has only demonstrated limited meaningful engagement with the GDC. Therefore, she invited the Committee to conclude that his fitness to practise is currently impaired on public protection grounds.

22. In respect of the wider public interest, Miss Bagott submitted that the matters found proved related to fundamental and basic aspects of dentistry. She submitted that if a finding of impairment were not made, then public confidence in the profession would be undermined. She therefore also invited the Committee to conclude that Mr Stamoulis' fitness to practise is impaired on public interest grounds.
23. In respect of sanction, Miss Bagott submitted that the only proportionate and appropriate sanction would be a further period of suspension for six months with a review hearing before the expiry. She submitted that this would protect the public and the public interest considerations, whilst also providing Mr Stamoulis a further opportunity to show that he had addressed matters of insight and remediation.

Decision on Current Impairment

24. In making its decision, the Committee first sought to determine whether Mr Stamoulis' fitness to practise is currently impaired by reason of his misconduct. It exercised its independent judgement and was not bound by the decision of the previous Committee. It balanced Mr Stamoulis' interests with those of the public and bore in mind that its primary duty is to protect the public, which included maintaining public confidence in the profession and declaring and upholding proper standards and behaviour.
25. The Committee took into account the findings of the previous PCC in July 2025, which considered the documentation provided by Mr Stamoulis at the time and determined that he continued to demonstrate a lack of insight and that there were shortcomings in his remediation evidence. That PCC made recommendations to Mr Stamoulis of further documents he could submit to a future reviewing Committee and the GDC reminded Mr Stamoulis of this in an email to him in October 2025. However, the Committee has received no further documentation from Mr Stamoulis since the previous review hearing. The Committee has received no evidence to show that Mr Stamoulis has fully reflected on his misconduct and that he understands the gravity of it and the impact it had on the patients involved and public confidence in the profession. Neither has the Committee received any evidence, such as a PDP, evidence of CPD courses undertaken or evidence of any learning undertaken, to demonstrate that the clinical concerns have been fully remedied.
26. The Committee was mindful that the burden was on Mr Stamoulis to demonstrate to this Committee that his fitness to practise is no longer impaired. The Committee, however, has determined that he has not successfully discharged that burden. Mr Stamoulis has not attended the hearing and has not meaningfully engaged with the GDC since the previous review hearing in July 2025.
27. In conclusion, the Committee determined that owing to his lack of insight and remediation, there remained a risk of repetition of the misconduct found, which would put the public at risk if a finding of impairment were not made. Accordingly, the

Committee determined that Mr Stamoulis' fitness to practise remained impaired on public protection grounds.

28. The Committee also determined that a finding of impairment was required in the public interest. The Committee considered that the misconduct found related to basic and fundamental aspects of dentistry, which has not been remedied. The Committee determined, therefore, that a finding of impairment was required to maintain public confidence in the profession and to promote and uphold proper professional standards.

Decision on Sanction

29. The Committee next considered what sanction to impose on Mr Stamoulis' registration.

30. The Committee has found that Mr Stamoulis' fitness to practise remains impaired. In these circumstances, the Committee concluded that terminating the current suspension order would not be appropriate or sufficient for the protection of the public or would be in the public interest.

31. The Committee next considered whether to replace the current suspension order with one of conditions. In so doing, it noted that Mr Stamoulis had previously breached his conditions in this case and was currently not meaningfully engaging with the GDC. In these circumstances, the Committee did not have sufficient confidence that Mr Stamoulis would fully comply with any conditions on his registration or that they would sufficiently mitigate the risk to the public. Therefore, it determined that conditions were not appropriate, workable or sufficient for this case.

32. Accordingly, the Committee determined that it was necessary to maintain the current suspension order to protect the public and maintain public confidence in the dental profession. The Committee determined that a further period of suspension was appropriate and proportionate and that Mr Stamoulis' registration should be suspended for a further period of six months with a review before the expiry. The Committee considered that this length of time was sufficient for Mr Stamoulis to demonstrate that he has meaningfully reflected and shown insight into his misconduct and taken steps to fully remedy the concerns as recommended by the previous reviewing Committee and which he was reminded of in October 2025 by the GDC.

33. In line with above, the Committee recommends that Mr Stamoulis provides the information outlined by the PCC in July 2025 for a future reviewing Committee to consider:

- *'Your attendance at the review hearing;*
- *A focused, concise and personal reflective statement which demonstrates that you have a full understanding of the impact your actions have had on Patient A*



and Patient B and on public confidence in the profession, and how you intend to change your practice in the future to prevent any repetition of the concerns;

- *A detailed PDP addressing the initial concerns from October 2020;*
- *Targeted CPD relevant to the clinical risks identified; and*
- *Evidence of having kept your clinical knowledge and skills up to date.'*

34. Unless Mr Stamoulis exercises his right of appeal, the current suspension order will be extended by a period of six months, 28 days from the date that notice of this direction is deemed to have been served upon him. In the event that Mr Stamoulis does exercise his right of appeal, the suspension order currently in place on his registration will remain in force until the resolution of the appeal.

35. That concludes this hearing.