

PRIVATE HEARING**Professional Conduct Committee
Initial Hearing****1 - 3 September 2025****Name:** GUILLIARD, Sonia Fay**Registration number:** 141793**Case number:** CAS-198986

General Dental Council: Miss Lydia Barnfather, Counsel.
Instructed by Clare Hastie, Kingsley Napley**Registrant:** Present only at the start of the hearing
Represented by Mr Steven Guilliard, a family member

Fitness to practise: Impaired by reason of misconduct**Outcome:** Suspension (with a review)**Duration:** Three Months**Immediate order:** None imposed

Committee members: Clive Powell (Lay) (Chair)
Hemash Shah (Dentist)
Samantha Snoad (Dental Care Professional)**Legal adviser:** Angus Macpherson**Committee Secretary:** Andrew Keeling

CHARGE

GUILLIARD, Sonia Fay, Dental Nurse, verified experience in Dental Nursing, is summoned to appear before the Professional Conduct Committee on 1 September 2025 for an inquiry into the following charge:

“That, being a registered dental nurse,

1. *From 2014 to 2016 you were employed as a dental nurse at Practice 1.*
2. *You caused or permitted claims to be made in the names of [PRIVATE] for Units of Dental Activity under the National Health Service General Dental Services Contract as follows:*
 - (a) *a Band 2 claim [172733] on or about 31 March 2015 in respect of treatment that had not been provided as claimed to [PRIVATE];*
 - (b) *a Band 2 claim [172735] on or about 31 March 2015 in respect of treatment which had not been provided as claimed to [PRIVATE] (later withdrawn);*
 - (c) *a Band 2 claim [172734] on or about 31 March 2015, in respect of treatment that had not been provided as claimed to [PRIVATE].*
3. *Your conduct as set out above at 2 (a), (b) and/or (c):*
 - (a) *was inappropriate;*
 - (b) *lacked integrity;*
 - (c) *was dishonest in that you sought to facilitate the acquisition of UDAs which you knew ought not to have been claimed.*

And that, by reason of the facts alleged, your fitness to practice is impaired by reason of your Misconduct”.

1. This was a Professional Conduct Committee (PCC) inquiry into the facts which formed the basis of the allegation against Mrs Guilliard that her fitness to practise is impaired by reason of misconduct.
2. Mrs Guilliard did not attend the hearing, apart from a brief period during the morning of the first day of the hearing, when she attended remotely by Microsoft Teams. Mr Steven Guilliard, who is Mrs Guilliard's husband, represented Mrs Guilliard. Mr Guilliard attended the hearing in person. Miss Lydia Barnfather, Counsel, presented the General Dental Council's (GDC) case. The hearing took place in person at the hearing suite of the Dental Professionals Hearing Service in Wimpole Street, London, between 1 September 2025 and 3 September 2025.

Preliminary Matters (1 September 2025)

Mrs Guilliard's Attendance and Representation

3. At the outset of the hearing, the Committee first sought to establish whether it was appropriate for Mr Guilliard to represent her at this hearing. The Committee also noted that [PRIVATE]. The Committee had sight of an email, dated 1 September 2025, sent by Mrs Guilliard in which she confirmed that she was, '*content for the hearing to proceed in my absence*'. However, the Committee had concerns about the provenance of this email owing to the grammatical and linguistic errors contained within it.
4. Miss Barnfather referred the Committee to Rule 52(2) of the GDC (Fitness to Practise) Rules Order of Council 2006 ('the Rules') which permitted a registrant to be represented by a family member. She further submitted that she understood that Mrs Guilliard would be admitting the allegations and that Mr Guilliard would not be giving evidence. On that basis, Mrs Barnfather submitted that the GDC had no objection to Mr Guilliard representing Mrs Guilliard at this hearing.
5. In respect of Mrs Guilliard's email, Miss Barnfather submitted that Mrs Guilliard is not attending the hearing owing to events in her private and family life. She informed the Committee that Mrs Guilliard was asked to submit an email to confirm that she would not be attending the hearing, but owing to the events in her private life and as she was only asked to submit the email this morning, it was understandable that she was not as focussed as usual.
6. Mr Guilliard submitted that he has been in contact with Mrs Guilliard this morning and if it would assist the Committee, he could ask her to attend remotely.
7. The Committee decided that it would be assisted by Mrs Guilliard's attendance to confirm that she would like Mr Guilliard to represent her and also to confirm whether she admitted to the allegations.

Mrs Guilliard's Attendance and Admissions

8. Mrs Guilliard subsequently attended the hearing remotely by video-link. She confirmed that she was content for the hearing to proceed in her absence and that she would be represented by her husband. She further confirmed that she admitted to the heads of charge in their entirety.
9. The Committee heard and accepted the advice of the Legal Adviser on the matter of Mrs Guilliard's representation. It was satisfied, based on Mrs Guilliard's oral confirmation, that Mr Guilliard could represent her at this hearing.

Conflict of Interest (1 September 2025)

10. The Committee then went to consider a possible conflict of interest in respect of the Dental Care Professional member of the Committee, Ms Snoad.
11. Ms Snoad announced that she was aware of the practice where the alleged incidents took place and knew the dentist who Mrs Guilliard had worked with at the time. Ms Snoad confirmed, however, that although she was aware that an issue had arisen at the practice, she was not aware of the facts. Furthermore, Ms Snoad confirmed that she had not discussed the matter with the dentist with whom Mrs Guilliard had worked.
12. In light of Ms Snoad's declaration, the Chair invited parties to make submissions on whether this amounted to a conflict of interest.
13. Miss Barnfather submitted that the GDC was neutral as to whether this amounted to a conflict of interest.
14. Mr Guilliard submitted that he had no objections to Ms Snoad hearing this case.
15. The Committee heard and accepted the Legal Adviser's advice. The Committee noted that Ms Snoad had been entirely transparent with parties about her knowledge, or otherwise, of the matters in this case. She had also confirmed that she was unaware of the facts of the case and had not discussed the matter with the dentist with whom Mrs Guilliard had worked at the time. Therefore, the Committee determined that it was entirely appropriate for Ms Snoad to hear the case and that an informed observer would not conclude that there was a real possibility that she would be biased.

Decision on Private Hearing (1 September 2025)

16. The Committee next considered whether the hearing should be heard in private pursuant to Rule 53(1) and (2) of the Rules. The Committee noted that the heads of charge include **[PRIVATE]**.
17. Miss Barnfather submitted that the GDC did not intend for the hearing to be conducted in private and was mindful of the allegations already being in the public domain. She also submitted that **[PRIVATE]** and reminded the Committee of the principle of open justice.

18. Mr Guilliard submitted that he agreed that the allegations were already in the public domain and he had no objection to the hearing being conducted in public.
19. The Committee accepted the Legal Adviser's advice. The Committee noted that [PRIVATE]. Therefore, the Committee determined that the hearing should be heard entirely in private [PRIVATE].

Background

20. Miss Barnfather took the Committee through the background to the case. She submitted that the events in question took place at Practice 1, where Mrs Guilliard had worked as a dental nurse between 2014 and 2016. In April 2015, a husband of one of the other dental nurses at the practice had reported to NHS Counter Fraud allegations that, under the direction of the practice owner, the practice was committing fraud and falsely inputting treatment onto patient records that had not been undertaken and submitting false claims. The GDC obtained a witness statement, dated 14 May 2024, from David Horsley, a former fraud investigator with NHS Counter Fraud. Mr Horsley stated that widespread fraud between 2014 and 2016 was uncovered involving a number of staff and performers at the practice, and that 829 claims were determined by NHS Counter Fraud to be false.
21. It is alleged that Mrs Guilliard caused or permitted three false claims to be made on or about 31 March 2021 [PRIVATE]. It is alleged that these claims were in respect of treatment that had not been provided. One of the claims was later withdrawn, and then resubmitted. Nevertheless, it is alleged that Mrs Guilliard's actions were inappropriate, lacking integrity and dishonest. Miss Barnfather submitted that the Unit of Dental Activity (UDA) value in each of the three claims varied between £20 and £25 per UDA (totalling approximately between £180 and £225). As part of the NHS Counter Fraud's investigation, Mrs Guilliard was interviewed under caution on 21 September 2016 and 9 May 2017. Miss Barnfather submitted that during her interview, Mrs Guilliard provided 'no comment' answers throughout most of the interview, but did suggest that she had put the claims through on the instruction of another person at the practice. Miss Barnfather also submitted that Mrs Guilliard had indicated during the interview that she thought the owner of the practice was a bully.

Evidence

22. By way of factual evidence from the GDC, the Committee was provided with the following signed witness statements with associated exhibits:
- David Horsley, a former Senior Fraud Investigator with NHS Counter Fraud, dated 14 May 2024 – the exhibits to Mr Horsley's witness statement included the transcripts of Mrs Guilliard's two interviews under caution with NHS Counter Fraud;

- James Viles, Senior Business Development lead with NHS Business Services Authority Dental Services Division, dated 11 June 2025.

23. The Committee received copies of dental records for [PRIVATE]. It also received an expert report, dated 19 April 2024, from Dr Jane Ford.

24. It was agreed that there was no need for any of the witnesses to give oral evidence at this hearing.

25. The Committee received two emails, dated 1 September 2025, from Mrs Guilliard at this stage of the proceedings.

Decision on Admissions (1 September 2025)

26. The Committee heard and accepted the Legal Adviser's advice on Mrs Guilliard's admissions.

27. The Committee noted and accepted Mrs Guilliard's admissions and in line with the GDC's '*Guidance on Admissions made at the Preliminary Stage in Fitness to Practise Proceedings*' (issued in October 2022) announced heads of charge 1 to 3 in their entirety as found proved, having satisfied itself that these admissions were supported by the documentary evidence before it.

28. The hearing then proceeded to Stage 2.

Stage 2 (2 – 3 September 2025)

Documents

29. The Committee had regard to two further documents, submitted on Mrs Guilliard's behalf at this stage of the proceedings. These were:

- Mrs Guilliard's letter to the GDC, undated but received by the GDC on 23 September 2021, in response to the allegations; and
- A testimonial, dated 1 September 2025, from the practice where Mrs Guilliard currently works.

30. The Committee heard no oral evidence at this stage of the proceedings.

Submissions

31. In accordance with Rule 20 of the Fitness to Practise Rules 2006, the Committee then heard submissions from Miss Barnfather and from Mr Guilliard in relation to the matters of misconduct, impairment and sanction.

32. In accordance with Rule 20(1)(a), Miss Barnfather informed the Committee that Mrs Guilliard has no previous fitness to practise history with the GDC.
33. With regard to misconduct, Miss Barnfather submitted that Mrs Guilliard had engaged in repeated acts of dishonesty, which involved theft from the public purse as well as the falsification of patients' records in which it was clear that she was party. She referred the Committee to the GDC publication *Standards for the Dental Team (2013)* and outlined the Standards which Mrs Guilliard had breached. She submitted that Mrs Guilliard's conduct had breached the most basic tenets of the dental profession and clearly undermined the trust placed by the public in dental professionals. She submitted that the Committee should have little hesitation in concluding that her actions clearly amounted to misconduct.
34. Miss Barnfather then moved on to the issue of current impairment. She submitted that dishonesty is difficult to remediate, and insight and remediation are of less relevance in non-clinical cases which feature dishonesty. However, she submitted that despite the passage of time since the index events, Mrs Guilliard's insight is incomplete and unsatisfactory. There is a paucity of evidence of insight and reflection and this will be a cause of concern for the Committee. She submitted that the Committee should keep at the forefront of its mind that the public interest mandates a finding of impairment as public confidence in the profession would be undermined if a finding of impairment was not made in a case involving dishonesty, which is directly linked to the practice of Mrs Guilliard's profession.
35. Miss Barnfather next addressed the Committee on the matter of sanction. She submitted that the appropriate and proportionate sanction would be one of suspension. She referred the Committee to the GDC's Guidance for The Practice Committees including Indicative Sanctions Guidance (October 2016, revised December 2020) (the GDC's Guidance). She submitted that the GDC's Guidance states that suspension is appropriate where the Registrant has not shown insight but also, more importantly, where public confidence in the profession would be insufficiently protected by a lesser sanction. She submitted that the Committee will determine the length of any such suspension and will consider the least period necessary to uphold standards and public confidence in the profession.
36. Mr Guilliard read from a document prepared by Mrs Guilliard in respect of this case. In that letter, Mrs Guilliard stated that she admits to the allegations and that the GDC has been aware of these allegations for nine years. Mrs Guilliard stated that she wanted to attend the hearing in person to express her shame and regret about her actions. She stated that she acted under duress and felt bullied by her employer, and this led to an employment tribunal. She regretted being intimidated and noted that her actions fell below the standards expected. This is a matter of immense regret, which she thinks about to this day. She stated that she is a highly experienced and qualified Dental Nurse and referred to the positive testimonial from her current employer. She also stated that she has undertaken Continuing Professional Development (CPD) training at her current employment, and this included Ethics training. She hoped that the

Committee would take into account her regret and sincere shame about her conduct when determining this case.

37. Mr Guilliard then made submissions to the Committee on Mrs Guilliard's behalf. He submitted that Mrs Guilliard does not deny that her conduct fell below the standards expected. In respect of current impairment, he submitted that he understood that to mean whether Mrs Guilliard is a fit and proper person today. In his view, he submitted that Mrs Guilliard is not currently impaired. He submitted that Mrs Guilliard is well aware of the consequences of making false claims and that her reluctance to provide evidence at this hearing is based on her shame about her actions at the time. He submitted that Mrs Guilliard wished she could turn the clock back.

Committee's Decision

38. The Committee has borne in mind that its decisions on misconduct, impairment and sanction are matters for its own independent judgment. There is no burden or standard of proof at this stage of the proceedings. The Committee had regard to the GDC's Guidance. The Committee also received advice from the Legal Adviser which it accepted. The Committee first considered whether the facts found proved amounted to misconduct.

Misconduct

39. The Committee had regard to the GDC publication *Standards for the Dental Team* (2013). It determined that Mrs Guilliard had breached the following sections in particular:

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.*

4.2 *Protect the confidentiality of patients' information and only use it for the purpose for which it was given.*

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.*

40. The Committee has found proved that Mrs Guilliard submitted three false claims to the NHS [PRIVATE]. The Committee found her actions to be inappropriate, lacking integrity and dishonest. Mrs Guilliard admitted to these allegations and claimed that she was intimidated and placed under pressure by her employer to make these claims. However, the Committee has seen no documentary evidence to support these assertions of bullying or intimidation. It had sight of the transcripts of Mrs Guilliard's interview under caution with NHS Counter Fraud. However, it noted that Mrs Guilliard

declined to answer some questions put to her, and the answers she did provide did not directly support the proposition that she had been acting under duress.

41. The Committee was satisfied that Mrs Guilliard had fallen far short of the standards of conduct that are proper in these circumstances. Dental professionals are placed in a position of trust and required to act with honesty and integrity. The Committee considered that Mrs Guilliard had engaged in dishonest conduct which was linked to her profession as a Dental Nurse, and that her dishonest conduct constituted a breach of a fundamental tenet of the profession. In conclusion, therefore, the Committee determined that Mrs Guilliard's dishonest conduct was serious and amounted to misconduct.

Impairment

42. The Committee then considered whether Mrs Guilliard's fitness to practise is currently impaired by reason of her misconduct.
43. The Committee considered all the documentary evidence in this case. It noted that no evidence had been provided on Mrs Guilliard's behalf, apart from a testimonial from her current employer and various correspondence submitted to the GDC. The Committee noted, therefore, that although the index matters occurred in 2015, Mrs Guilliard has provided no material evidence of remediation or insight into her misconduct. There is no evidence before this Committee, such as a written reflective piece, to demonstrate that Mrs Guilliard understands the seriousness of her misconduct, her explanation as to why it took place and the impact it has had on the dental profession, the public and her regulator, or any steps she has put in place to avoid a repetition. In particular, the Committee found it concerning that, despite her admissions at this hearing, in Mrs Guilliard's letter to the GDC in September 2021 she was still denying the allegations, stating that, *'no fraud was committed by me (Sonia) and why would I?'* The Committee noted that her misconduct took place in 2015, that she admitted the fraud in the NHS Counter Fraud interview in 2016, but that she appeared to be denying the allegations five years later. The Committee noted the positive testimonial from Mrs Guilliard's employer. However, it makes no mention of whether they were aware of the allegations against her. The Committee also noted that it was submitted that Mrs Guilliard has undertaken CPD courses in Ethics, however, no documentary evidence of this has been presented at this hearing.
44. For these reasons, and particularly owing to the serious nature of the dishonest conduct, which is linked to Mrs Guilliard's practice as a Dental Nurse, the Committee determined that a finding of impairment for Mrs Guilliard's dishonest misconduct is necessary to protect the public and in the wider public interest to maintain public confidence in the profession and uphold proper standards of conduct. The Committee has concluded that a reasonable and informed member of the public, fully aware of the facts of the case, would have their confidence in the profession undermined if a finding of impairment were not made in the circumstances of this case.

45. The Committee therefore determined that Mrs Guilliard's fitness to practise is currently impaired by reason of her misconduct.

Sanction

46. The Committee next considered what sanction, if any, to impose on Mrs Guilliard's registration. It recognised that the purpose of a sanction is not to be punitive although it may have that effect. The Committee applied the principle of proportionality balancing Mrs Guilliard's interest with the public interest. It also took into account the *GDC's Guidance*.

47. The Committee considered the mitigating and aggravating factors in this case as outlined the GDC's guidance at paragraphs 5.17 and 5.18.

48. The mitigating factors in this case include:

- Evidence of good conduct following the incident in question;
- Evidence of previous good character;
- No apparent financial gain on the part of Mrs Guilliard;
- The misconduct took place on one day in March 2015; and
- Time elapsed since the incident.

49. The aggravating factors in this case include:

- Dishonesty in a professional capacity;
- Breach of trust – Mrs Guilliard used patients' details to make the false claims; and
- Lack of insight.

50. The Committee decided that it would be inappropriate to conclude this case with no further action. It would not satisfy the public interest given the serious nature of the dishonest misconduct.

51. The Committee then considered the available sanctions in ascending order starting with the least serious.

52. The Committee concluded that misconduct of this nature could not be adequately addressed by way of a reprimand. Dishonest conduct by a dental professional is a breach of a fundamental tenet of the profession. The public interest would not be sufficiently protected by the imposition of such a sanction, particularly as Mrs Guilliard has not evidenced that she has insight into her misconduct and remediated the concerns. The Committee therefore determined that a reprimand would be inappropriate and inadequate.

53. The Committee considered whether a conditions of practice order would be appropriate. The Committee considered that dishonesty is an attitudinal concern, and therefore it would be difficult to formulate appropriate and workable conditions to address this. Furthermore, the Committee was of the view, that conditions would neither reflect the seriousness of Mrs Guilliard's dishonest behaviour nor adequately address the public interest concerns arising from such behaviour.
54. The Committee then considered whether an order of suspension would be appropriate to mark the nature and severity of the misconduct. It noted in the *GDC's Guidance* that suspension is appropriate for more serious cases when:
- the Registrant has not shown insight;
 - Patients' interests would be insufficiently protected by a lesser sanction;
 - Public confidence in the profession would be insufficiently protected by a lesser sanction;
 - There is no evidence of harmful deep-seated personality or professional attitudinal problems (which might make erasure the appropriate order).
55. The Committee considered that these aspects were present in this case.
56. The Committee considered that Mrs Guilliard has provided no evidence of remediation or any insight into her misconduct, despite the long period of time since the incidents occurred. The Committee determined, therefore, that the appropriate and proportionate sanction is one of suspension.
57. The Committee considered the option of erasure, but although it considers that Mrs Guilliard's dishonesty is serious, it noted that it took place on one day in March 2015 and there has been no repetition of dishonest conduct since. It further noted that the financial value of the false claims only amounted to approximately between £180 and £225 in total. Furthermore, it appears that Mrs Guilliard has had an unblemished career as a dental nurse apart from these incidents. The Committee therefore determined that a sanction of erasure would be disproportionate as it did not consider Mrs Guilliard's dishonesty to be so serious that her conduct is fundamentally incompatible with continued registration.
58. Accordingly, having had regard to all of the evidence, the Committee has determined to direct that Mrs Guilliard's registration be suspended for the period of three months. The Committee is satisfied that this period of time is sufficient and necessary to mark the nature and extent of her misconduct, to uphold professional standards and to maintain public confidence in the profession.
59. The Committee also directs that the suspension order be reviewed before its expiry. The Committee considered that the reviewing Committee may be assisted by the following evidence from Mrs Guilliard:
- Evidence of recent relevant CPD activity undertaken, e.g. Ethics course(s);

- A written reflective piece, including Mrs Guilliard's explanation as to why she acted dishonestly, the steps she has taken to avoid a repetition and the impact of her dishonest conduct on the dental profession, the public and the GDC;
- A written apology from Mrs Guilliard for her actions;
- Testimonials from her employer(s) in which it is stated that they are aware of the findings at this hearing.

60. The Committee now invites submissions from both parties as to whether an immediate order should be imposed on Mrs Guilliard's registration.

Decision on Immediate Order (3 September 2025)

61. The Committee has considered whether to make an order for the immediate suspension on Mrs Guilliard's registration in accordance with Section 36U of the Dentists Act 1984 (as amended).

62. Miss Barnfather, on behalf of the GDC, submitted that she will be making no submissions on whether an immediate order should be imposed and will leave it to the Committee.

63. Mr Guilliard, on Mrs Guilliard's behalf, submitted that no restriction has been imposed on Mrs Guilliard's registration to date and that no immediate order should be imposed now.

64. The Committee has considered the submissions made. It has accepted the advice of the Legal Adviser.

65. In all the circumstances, the Committee has determined that the imposition of an immediate order of suspension on Mrs Guilliard's registration is not required on the grounds of public protection, the public interest or in her own interests. It has noted that Mrs Guilliard has practised for 10 years since the index incident without any concerns. The Committee was also mindful of the principle of proportionality. Therefore, unless Mrs Guilliard exercises her right of appeal, the substantive direction for suspension, as already announced, will take effect 28 days from the date of deemed service for a period of three months.

66. That concludes this determination.