

**PUBLIC HEARING****Professional Conduct Committee  
Initial Hearing****21- 29 September 2026****Name:** SOTIROPOULOS, Sotirios**Registration number:** 282619**Case number:** CAS-209716-W8V4H8

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**General Dental Council:** Guy Micklewright, Counsel  
Instructed by Rashida Conroy, IHLPS**Registrant:** Not Present  
Unrepresented

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**Fitness to practise:** Impaired by reason of misconduct**Outcome:** Erased with Immediate Suspension**Immediate order:** Immediate suspension order

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**Committee members:** Matthew King (Chair, Dentist Member)  
John Marley (Lay Member)  
Katarzyna Richards (Dental Care Professional Member)**Legal adviser:** Valerie Paterson**Committee Secretary:** Jenny Hazell

The charges against Mr Sotiropoulos are as follows:

“That being a registered dentist:

1. Between 17 April 2023 and 14 June 2023, you failed to provide an adequate standard of care to Patient A, in that you:
  - a) Failed to assess adequately:
    - i. The UL7
    - ii. The relationship of the UL7 to adjacent teeth
    - iii. The relationship of the UL7 to the opposing dentition
  - b) Failed to provide an adequate standard of treatment to Patient A, in particular the UL7
  - c) Failed to take periapical radiographs of the UL7 on 10 May 2023
  - d) Failed to discuss adequately the risks and benefits of treatment with Patient A
  - e) By virtue of 1. d) above, you failed to obtain valid consent for treatment
2. At appointments between 6 March 2023 and 14 June 2023 you failed to keep adequate clinical records
3. At appointments between 6 March 2023 and 14 June 2023 you failed to treat Patient A with dignity and respect
4. You failed to have the benefit of adequate indemnity cover:
  - a) Between 1 January 2020 and 31 January 2021
  - b) Between 31 January 2023 and 16 April 2023
5. You provided fake MDDUS indemnity certificates to the General Dental Council purporting to provide indemnity cover for the periods:
  - a) 1 January 2020 to 31 January 2021
  - b) 31 January 2023 to 16 April 2023
6. Your conduct at paragraph 5 above was:
  - a) Misleading
  - b) Dishonest, in that you knew the MDDUS certificates were fake and intended the General Dental Council to believe they were legitimate

AND by reason of the alleged facts, your fitness to practise is impaired by reason of misconduct.”

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

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

2. At the outset, Mr Micklewright made an application under Rule 54 of the GDC (Fitness to Practise) Rules Order of Council 2006 ('the Rules'), for the PCC hearing to proceed in the absence of Mr Sotiropoulos. He submitted that the GDC has complied with the requirements of serving the Notice of Hearing (the Notice) on Mr Sotiropoulos in accordance with Rules 13 and 65, as demonstrated by the documents contained in the GDC's hearing bundle. This included a copy of the Notice of Hearing dated 20 August 2026, which sets out the allegations against Mr Sotiropoulos (including the additional allegations 4a, 5 and 6, which the GDC was seeking to join under Rule 25 at a preliminary meeting of the PCC), as well as the date and time of this hearing. Mr Micklewright also referred to the Royal Mail track and trace receipt which confirm that the letter was delivery to Mr Sotiropoulos' registered address on 21 August 2026. In addition, the Notice was sent via secure email on 20 August 2026 to Mr Sotiropoulos registered email address.

3. Mr Micklewright drew the Committee's attention to an email dated 6 August 2026 from Mr Sotiropoulos to the GDC (regarding the preliminary meeting) in which he stated: *"I don't want to be updated ! I'm not interested in working in the UK. Please stop disturbing me."* Mr Micklewright confirmed that the application to join allegations 4a, 5 and 6 was granted by a preliminary meeting of the PCC on 21 August 2026. He referred to the Preliminary meeting's decision and the email from the GDC's listing team to Mr Sotiropoulos' registered email address, notifying him of the Committee's decision. It was Mr Micklewright's submission that the Committee can infer from the tenor of the email dated 6 August 2026 that Mr Sotiropoulos does not wish to engage with the GDC in these proceedings.

4. Mr Micklewright submitted that Mr Sotiropoulos has not requested an adjournment of these proceedings and there is no indication that an adjournment would secure his attendance at a future date. He advised the Committee that Patient A submitted her complaint to the GDC on 15 August 2023 about the clinical care she received from Mr Sotiropoulos in 2023 and therefore the allegations are of some age. The GDC's position is that there is a public interest in proceeding with the hearing and determining the allegations, particularly given that memories can fade with the passing of time. Mr Micklewright indicated that he intended to call a number of witnesses in this case and highlighted the inconvenience and the potential cost in not proceeding with the hearing. In short, Mr Micklewright submitted that there are no good reasons for adjourning the hearing and that the hearing should proceed in the absence of Mr Sotiropoulos.

5. The Committee has had regard to the submissions made by Mr Micklewright. It has accepted the advice of the Legal Adviser. The Committee has also had regard to paragraphs 33 to 37 (under the heading Proceeding in the absence of the registrant) of the GDC's "Guidance: Fitness to Practise: Guidance for the practice committees" (January 2026) (the GDC's Guidance).

### **Decision on service**

6. The Committee first considered whether the Notice has been served on Mr Sotiropoulos in accordance with Rules 13 and 65 and Section 50A(2) of the Dentists Act 1984 (as amended) (the 'Act'). It has had regard to the Notice dated 20 August 2026 which was delivered by Royal Mail special delivery to Mr Sotiropoulos' registered address on 21 August 2026. The Committee is satisfied that the address shown on the Notice is the same address as that shown in the bundle as being Mr Sotiropoulos' registered address with the GDC. The Notice contains all the required

particulars, including the date and time of the hearing, as well as the allegations against Mr Sotiropoulos. The Notice further sets out that the Committee has the power to proceed with the hearing in the absence of Mr Sotiropoulos. In light of information before it the Committee is satisfied that the GDC had complied with the 28-day notice period required by Rule 13.

7. The Committee was further reassured by the email dated 24 August 2026 from the GDC's listing team to Mr Sotiropoulos' registered email address that he had been notified that the GDC's joinder application was granted by the Preliminary Professional Conduct Committee meeting on 21 August 2026. The determination sets out the additional allegations against Mr Sotiropoulos

8. The Committee also notes that on 20 August 2026 the GDC sent via secure email a copy of the Notice to Mr Sotiropoulos' registered email address.

9. Accordingly, the Committee is satisfied that the Notice has been served on Mr Sotiropoulos in accordance with the Rules and the Act.

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

10. The Committee next considered whether to proceed with the hearing in the absence of Mr Sotiropoulos in accordance with Rule 54. It has taken into account the factors to be considered as set out in paragraphs 33 to 37 of the GDC's Guidance.

11. The Committee is satisfied that all reasonable efforts have been made by the GDC to notify Mr Sotiropoulos of this hearing. The Notice sets out that Mr Sotiropoulos was asked to notify the GDC by 3 September 2026 if he would be attending the hearing and/or be represented. He was also asked to notify the GDC by 14 September 2026 if he had any comments regarding the GDC's hearing bundle or wished to provide any supportive information to the Committee. No response was received from Mr Sotiropoulos to those two requests.

12. The Committee has had regard to Mr Sotiropoulos' email to the GDC 6 August 2026 in which he stated: *"I don't want to be updated ! I'm not interested in working in the UK. Please stop disturbing me."* In light of that response, the Committee has drawn the inference that Mr Sotiropoulos has voluntarily absented himself from these proceedings and indeed any engagement with the GDC. He has not requested an adjournment and there is nothing before it to suggest that adjourning this hearing would secure Mr Sotiropoulos' attendance at a future date.

13. The Committee has borne in mind the need to be fair to Mr Sotiropoulos as well as the GDC's overall statutory objective which is the protection of the public. This includes the GDC's investigation of concerns which are raised about a dental professionals' fitness to practise. The allegations against Mr Sotiropoulos, which are of some age, are serious and give rise to potential risks to the public and public confidence which ought to be determined without undue delay. Accordingly, the Committee has determined that it is fair and is in the public interest to proceed with the hearing in the absence of Mr Sotiropoulos.

### **The GDC's case**

14. Mr Micklewright set out the background to the GDC's case. At the material time Mr Sotiropoulos was working as a registered dentist at the Practice. He was employed at the Practice from May 2022 until October 2023. On 15 August 2023 Patient A (an NHS patient) submitted a complaint to the GDC about the clinical care she had received from Mr Sotiropoulos between 6 March 2023 and 14 June 2023.

15. The care related to problems with Patient A's UL7. She attended for an emergency appointment on 6 March 2023 having lost the crown on her UL7 that had been fitted some time

previously. That tooth had also been previously root canal treated. The crown was lost again, leading to a further appointment on 17 April 2023 for re-cementation. Patient A attended on 10 May 2023 for a post-retained crown preparation of the UL7. The crown made did not fit at an appointment on 17 May 2023 and so Patient A attended a further appointment on 31 May 2023 for a new crown to be fitted. Patient A's final appointment with Mr Sotiropoulos took place on 14 June 2023. At that appointment Patient A complained of pain between the UL6 and UL7. Patient A says that Mr Sotiropoulos was dismissive and belittling, and she made a complaint to the Practice. She had a subsequent appointment with another dentist (the subsequent treating dentist) at the Practice on 12 July 2023. The matters alleged against Mr Sotiropoulos' care of Patient A are set out in allegations 1 to 3. In relation to the clinical matters, the GDC instructed an expert, Dr Simons, who provided a report dated 22 June 2026.

16. The GDC's case also concerns allegations relating to Mr Sotiropoulos' failure to have adequate indemnity cover covering specified dates between 2020 and 2021 and between January 2023 and April 2023. Caseworker 1 set out the chronology of events she had with Mr Sotiropoulos regarding indemnity cover, which included sending him several emails chasing him for the information. She received two copies of the certificate for 17 April 2023 to 16 April 2024 and a copy of a certificate for 1 February 2021 to 1 January 2022. The GDC's Caseworker 1 emailed Mr Sotiropoulos on 4 October 2023, advising him there remained a gap in his indemnity between 31 January 2023 and 16 April 2023 and asked for an explanation for the gap. On 11 October 2023, Caseworker 1 received an indemnity certificate for 31 January 2022 to 31 January 2023.

17. Another GDC Caseworker (Caseworker 2) in a different team carried out further investigations of the indemnity status of Mr Sotiropoulos. Caseworker 2 wrote to Mr Sotiropoulos, asking him to provide details of his indemnity and working arrangements. On 26 January 2025, Mr Sotiropoulos provided indemnity certificates for the following periods:

- 01 February 2021 to 31 January 2022
- 31 January 2022 to 30 January 2023
- 17 April 2023 to 16 April 2024
- 15 April 2024 to 14 April 2025

18. Caseworker 2 wrote back to Mr Sotiropoulos indicating that the GDC still required certificates from 1 January 2020 to 31 January 2021 and 31 January 2023 to 16 April 2023 along with full details of each employer for 1 January 2020 to January 2025. On 2 February 2025, Mr Sotiropoulos sent Caseworker 2 the following:

- Letter purporting to be from the MDDUS dated 1 January 2020
- Letter purporting to be from the MDDUS dated 1 January 2023
- Document purporting to be an indemnity certificate for the period 1 January 2020 to 31 January 2021
- Document purporting to be an indemnity certificate for the period 1 February 2023 to 31 April 2023.

19. The GDC's case is that Mr Sotiropoulos provided fake MDDUS indemnity certificates to the GDC purporting to provide indemnity cover for the periods 1 January 2020 to 31 January 2021 and 31 January 2023 to 16 April 2023 and that his conduct in this regard was misleading and dishonest (allegations 4 to 6). In respect of the indemnity cover, the GDC instructed Mr Foley, an insurance/indemnity expert, who provided a report dated 19 June 2026 in which he set out his opinion as to the authenticity of the indemnity certificates.

20. In support of its case the GDC relies on the following witness statements with associated exhibits contained in the PCC hearing bundle:

- Patient A's statement dated 20 May 2025
- The Practice Dental Nurse's statement dated 19 May 2025 (who was present at two or three of Patient A's appointments)
- The subsequent treating dentist's statement dated 19 May 2025
- GDC Caseworker 1's statement dated 21 May 2025
- GDC Caseworker 2's statement dated 21 May 2025
- Practice Manager's statement dated 25 June 2025
- Mr Foley's expert report dated 19 June 2026; a further bundle entitled "Indemnity expert bundle" and a bundle containing a schedule of indemnity documents.
- Dr Simons' report dated 22 June 2026

21. In addition, each of the above witnesses gave oral evidence in which they confirmed the content of their witness statements as being true and accurate. They also answered questions put to them by Mr Micklewright and the Committee. With the Committee's agreement, the Legal Adviser asked questions of Mr Foley.

## **Findings of Fact**

22. The Committee considered all the evidence presented to it, including the GDC's bundles of documents, as well as the oral evidence of the witnesses. It has taken into account the submissions made by Mr Micklewright on each of the alleged facts. The Committee has accepted the advice of the Legal Adviser. The Legal Adviser informed the Committee that Mr Sotiropoulos has no previous fitness to practise findings.

23. The Committee has 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. Mr Sotiropoulos need not prove anything. It has drawn no adverse inference by the non-attendance of Mr Sotiropoulos at these proceedings. However, the Committee is aware that Mr Sotiropoulos has provided no response in respect of the clinical matters. It noted Mr Sotiropoulos' response to allegation 5(b) as set out in his email to the GDC dated 17 July 2024. In that email he states: "*I fully understand the claims about 'dishonest' and 'misleading about my indemnity coverage for the 2-3 months period mentioned and I am willing to accept any decision-penalty for this timescale.'*"

24. Regarding the allegation of 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.

25. The Committee has made the following findings:

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| 1   | <i>Between 17 April 2023 and 14 June 2023, you failed to provide an adequate standard of care to Patient A, in that you:</i>                                                                                                                                                                                                                                                                                                                                                                                      |
| 1a  | <i>Failed to assess adequately:</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 1ai | <p><b>The UL7</b></p> <p><b>Found proved</b></p> <p>Patient A's evidence was that she attended for an emergency appointment on 6 March 2023 because the crown at the UL7 had been lost. She recollected that Mr Sotiropoulos advised her that little tooth remained and that the crown may fail again, further that a post may be required. She further recollected that Mr Sotiropoulos <i>explained "that he would need to drill into the tooth that would give the crown more to hold on to. I did ask</i></p> |

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|       | <p><i>if I needed to be sent away for this treatment to be carried out by someone else and he stated that he could perform this treatment. He went on to glue the crown back and I was not provided with any other options other than gluing it back on or getting the post fitted. The examination was carried out by him just looking into my mouth by opening it and he used instruments to examine it. The Registrant did not carry out any further investigations i.e., take images or x-rays. I did not sign any document prior, during or after the appointment.”</i> In her oral evidence Patient A confirmed that no investigations were carried out.</p> <p>The Committee considers that Patient A was a credible witness, who gave thoughtful, measured answers to questions put to her. It has accepted her evidence.</p> <p>Dr Simons’ evidence was that it was necessary to carry out a full examination of the UL7 and its relationship to the adjacent teeth and opposing dentition, which was indicated before the replacement of a failed crown. She noted that there was no record of why the old crown was lost, either at the initial emergency appointment or the following appointments. Further, she noted that there was no record of how much coronal tissue remained on the UL7 or whether there was still a good seal of the root canal filling or whether there was a chance of reinfection of the root canal system following the loss of the crown. She further set out that there is no record of the condition of the crown that was lost, no radiograph of the tooth was taken or an account of the condition of the adjacent or opposing teeth before the UL7 was re-crowned on 10 May 2023. In her opinion, this would be indicated before the replacement of the failed crown.</p> <p>Dr Simons opined that without proper assessment of the UL7 the standard of treatment was not acceptable.</p> <p>Dr Simons explained in her oral evidence that there was a history of failure with the crown at UL7 and that it was important to assess the overall health of UL7 or an indication as to its suitability for a new crown. Dr Simons’ evidence was that there were several occasions at appointments between April 2023 and June 2023 whereby Mr Sotiropoulos could have assessed the UL7 but he failed to do so.</p> <p>The Committee considered that Dr Simons gave a balanced and fair assessment of the clinical matters in this case. Further, it considers that she was judging matters to the appropriate clinical standards of a competent general dentist. It has accepted her evidence.</p> <p>The Committee notes that there is no clinical record made by Mr Sotiropoulos of a proper assessment of the UL7 and this lack of assessment may have contributed to the poor treatment outcome. Further, there is no radiograph to assess the standard of the UL7. Patient A’s evidence was that no investigations were carried out by Mr Sotiropoulos.</p> <p>Taking all these factors into account, the Committee is satisfied, on the balance of probabilities, that this charge is proved.</p> |
| 1a ii | <p><b><i>The relationship of the UL7 to adjacent teeth</i></b><br/><b>Found proved</b></p> <p>Dr Simons’ evidence was that Mr Sotiropoulos should have carried out an assessment of the adjacent teeth and the opposing teeth. She opined that there was nothing in the records to indicate Mr Sotiropoulos had carried that out before the UL7 was re-crowned on 10 May 2023.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

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|       | <p>In her oral evidence Dr Simons re-iterated the importance of assessing the condition of the adjacent or opposing teeth. Dr Simons considered that she would have been happy if there had been an entry in the clinical notes words to the effect of “NAD” (nothing abnormal detected) to indicate that an assessment had been carried out, but there was no such entry in the notes. The Committee has accepted Dr Simons’ evidence on this point and has accordingly found this charge proved.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 1aiii | <p><i>The relationship of the UL7 to the opposing dentition</i><br/><b>Found proved</b></p> <p>This is for the same reasons as set out at 1a ii above. In addition, the Committee has borne in mind that there is reference in Patient A’s clinical notes prior to her attendance with Mr Sotiropoulos that she was a “bruxist”, someone who grinds their teeth. Given this, the Committee considers that it was even more important that occlusal assessments were made.</p> <p>Dr Simons’ evidence was that it was important to pay attention to all the occlusal factors such as excessive occlusal forces, premature occlusal interferences and dynamic loading in excursive and protrusive guidance.</p> <p>The Committee has accepted Dr Simons’ evidence and has accordingly found this charge proved.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 1b    | <p><i>Failed to provide an adequate standard of treatment to Patient A, in particular the UL7</i><br/><b>Found proved</b></p> <p>Dr Simons’ evidence was that without proper assessment of the UL7, the standard of treatment was not acceptable. She explained that the contact point between the UL7 and UL6 was ‘open’ and the teeth did not contact properly, which led to inflammation, discomfort and pain from food packing. This was supported by Patient A’s evidence in which she described these symptoms. Dr Simons noted that Mr Sotiropoulos had recorded these symptoms in the clinical entry dated 14 June 2023. Dr Simons opined that there was no evidence that Patient A was informed of the fact that the crown was cemented with a gap between itself and the tooth in front, which she considered was not acceptable treatment. The Committee accepts Dr Simons’ evidence on this point.</p> <p>The Committee has also had regard to the clinical entry dated 19 July 2023 by the subsequent treating dentist, who reviewed Patient A on that date. That dentist records “crown discomfort, gap between teeth... food causing discomfort... crown didn’t fit at first so he drilled more”.</p> <p>The Committee has also had regard to its findings at charge 1a above. Accordingly, the Committee finds this charge proved.</p> |
| 1c    | <p><i>Failed to take periapical radiographs of the UL7 on 10 May 2023</i><br/><b>Found proved</b></p> <p>There is no record in the notes of a radiograph having been taken and no radiograph is available. Indeed, the only radiograph taken was taken by the subsequent treating dentist on 12 July 2023. Patient A’s evidence was that no radiographs were taken.</p> <p>Dr Simons’ evidence was that Mr Sotiropoulos should have carried out a proper assessment of the UL7, which would have included taking a periapical radiograph of</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

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|    | <p>the UL7 on 10 May 2023. She set out in her report as follows: <i>“It would have been prudent to have completed an assessment with the inclusion of a radiograph of UL7 before the UL7 was prepared for a crown on 10/05/23. It is common practice to ensure there is a recent periapical radiograph (a radiograph of the tooth and surrounding bone) before a tooth is prepared for a crown to assess the tooth's overall health, including the presence of any existing restorations, fractures, or signs of disease. Hence it would have been wise to have taken a periapical radiograph of UL7 once the crown had been lost and before it was prepared for a new crown on 10/05/23.”</i> Dr Simons also considered that a radiograph was required <i>“to assess a root filled tooth for post preparation.”</i></p> <p>Dr Simons maintained this opinion in her oral evidence.</p> <p>The Committee accepts Dr Simons’ evidence on this matter and accordingly finds this charge proved.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 1d | <p><b><i>Failed to discuss adequately the risks and benefits of treatment with Patient A</i></b><br/><b>Found proved</b></p> <p>Patient A’s evidence was that at the initial appointment on 6 March 2023 Mr Sotiropoulos told of the treatment he was proposing – namely that the only option was to put a post into the tooth. On Patient A’s account, Mr Sotiropoulos explained to her that he would need to drill into the tooth that would give the crown more to hold onto. It was Patient A’s evidence that she was not provided with any other options other than gluing the crown back on or having a post fitted. Patient A maintained in her oral evidence that there was no discussion about the risks or benefits of the treatment – and in particular prior to the commencement of the treatment on 10 May 2023. She also had no recollection that Mr Sotiropoulos told her that the UL7 was heavily compromised. The Committee accepts Patient A’s evidence in this regard.</p> <p>Dr Simons set out in her report as follows: <i>“the patient statement suggests the Registrant gave the option of a post and core and to save the tooth this may have been the best clinical option in the Registrant’s opinion and probably the one chosen by many Dentists. Other treatment options should have been discussed if the Registrant thought they were reasonable clinical alternatives. Other treatment options would be to do nothing, which would leave a broken tooth and so not a reasonable clinical alternative, extract the tooth, leaving a space or replacing with an implant or even a denture. These conversations may have occurred but there is no evidence in the clinical records that detail this and as Patients A intention was for the UL7 to be retained, it could be considered that these alternative treatment options were not reasonable.”</i></p> <p>Dr Simons inferred, from Patient A’s statement, that Mr Sotiropoulos had identified a clinical need for a post and core and that this was discussed. However, the risks and benefits of such a procedure, or the likely the prognosis of the post/core/crown did not appear to have been discussed. Dr Simons’ overall opinion, based on the clinical notes and Patient A’s evidence, was that Mr Sotiropoulos did not adequately discuss the risks and benefits of treatment and, consequentially, he did not obtain Patient A’s informed consent.</p> <p>The Committee notes that for the appointment on 14 June 2023 Mr Sotiropoulos has made an entry in the notes as follows:</p> <p><i>“apologised from out side for missing it but explained from the beginning</i></p> |

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|    | <p><i>that this tooth was heavily compromised and we had lack of prosthetic space for a new crown as explained from the very first day"</i></p> <p>In relation to the charge, the Committee considers that this evidence alone is insufficient to demonstrate that the risks and benefits of the treatment were adequately discussed. It considers that a more detailed list of the risks and benefits of the treatment should have been discussed with Patient A and recorded well before the appointment on 14 June 2023, by which time the crown was being fitted.</p> <p>The Committee accepts the evidence of Patient A and that of Dr Simons. Accordingly it finds this charge proved.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 1e | <p><i>By virtue of 1. d) above, you failed to obtain valid consent for treatment</i><br/><b>Found proved</b></p> <p>Dr Simons referred in her report to the GDC's Standards for the Dental Team which states " <i>You should document the discussions you have with patients in the process of gaining consent.</i>" Her opinion was that Mr Sotiropoulos failed to obtain informed consent from Patient A to replace the crown on UL7 and to place a post and core, as not all the risk or benefits were discussed with Patient A.</p> <p>The Committee is satisfied that Mr Sotiropoulos had a duty to inform Patient A of risks and benefits throughout the stages of the treatment. There is nothing in Patient A's notes to show that Mr Sotiropoulos had documented any such discussions with Patient A. The Committee accepts Dr Simons' evidence and in light of its findings at 1d above, it finds this charge proved.</p>                                                                                                                                                                                                               |
| 2  | <p><i>At appointments between 6 March 2023 and 14 June 2023 you failed to keep adequate clinical records</i><br/><b>Found proved</b></p> <p>Dr Simons' opinion is that the standard of clinical note-keeping for the period in question fell far below the standard expected for the reasons set out in her report as follows: "<i>Mr Sotiropoulos' written entries in the clinical records on 6/3/23, 17/04/23, 10/5/23, 17/5/23, 31/5/23 and 14/6/23 are unclear as to what treatment was provided, what discussions occurred, what materials were used and whether consent was obtained for treatment provided..... I am of the opinion that at each of these appointments the clinical record keeping falls far below the expected standard.</i>"</p> <p>The Committee has reviewed the clinical records and agrees with Dr Simons' opinion. In particular, for the appointment on 17 May 2023, the Committee notes Patient A's evidence in which she mentions the broken first crown, there is no record of an attempted fitting of the crown.</p> <p>The Committee accepts Dr Simons' opinion and accordingly finds this charge proved.</p> |
| 3  | <p><i>At appointments between 6 March 2023 and 14 June 2023 you failed to treat Patient A with dignity and respect</i><br/><b>Found proved</b></p> <p>The Committee notes that there is a duty on a dentist to treat every patient with dignity and respect at all times by virtue of GDC Standard 1.2.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

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|      | <p>Patient A's evidence was at the appointment on 17 May 2023, Mr Sotiropoulos told her that her gums were inflamed, and that she <i>"hadn't done a good job with brushing my teeth. I said I was quite sore in that area due to the ulcer and his response was that was because I hadn't brushed my teeth well enough. I did not respond."</i></p> <p>Patient A also recollected at the appointment on 31 May 2023 Mr Sotiropoulos said to her words to the effect of <i>"you are a doctor; is it actually pain or discomfort"</i>. She further described that on 14 June 2023 (her last appointment with Mr Sotiropoulos) he talked over her, he appeared angry and dismissive towards her and he used language such as, <i>"you are a doctor, you should understand"</i>. Patient A confirmed in her evidence that she was a veterinary surgeon, not a dentist or doctor.</p> <p>The Committee found Patient A to be a credible witness and there was nothing to undermine her evidence.</p> <p>The Committee also heard from the Practice's Dental Nurse who had been present at two or three of Patient A's appointments. She set out what took place at the last appointment with Patient A on 14 June 2023 as follows: <i>"... I remember the Patient[A] being very upset with some crown work the Registrant had done for her. The appointment took place in surgery room 4. It was me, the Registrant and the Patient present in the room. I remember the Registrant belittling her and there being a disagreement with the treatment, i.e., the Patient wasn't happy with the crown and how the Registrant fitted it. She was very upset and asked me to go and get the Practice Manager [named person]. I went to go get [named person] and he came in and I was asked to leave the room. Prior to [named person] coming into the room, when I was present, the Registrant belittled her by saying "you are a doctor you should know what is going on", her response was "but I am a vet not a dentist hence why I have asked your opinion", which he laughed at this response. He said this because she was a doctor, as it said that on the system, and she was very upset."</i></p> <p>The Practice Dental Nurse maintained her recollection of events in her oral evidence. The Committee considered that she was a credible and reliable witness.</p> <p>The Committee considered that Patient A's account is supported by the evidence of the Practice's Dental Nurse. They describe similar language being used by Mr Sotiropoulos to Patient A. The Practice Dental Nurse used the word <i>'sneering'</i> to describe the way in which Mr Sotiropoulos spoke to Patient A.</p> <p>The Committee has accepted the evidence of Patient A and that of the Practice's Dental Nurse. It is clear from Patient A's evidence that she was upset by Mr Sotiropoulos' behaviour and language used towards her at that last appointment such that she asked for the Practice Manager to come into the room. Accordingly, it finds this charge proved.</p> |
| 4    | <i>You failed to have the benefit of adequate indemnity cover:</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 4a – | <i>Between 1 January 2020 and 31 January 2021</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 4b   | <i>Between 31 January 2023 and 16 April 2023</i><br><b>Found proved</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|      | <p>The Committee has had regard to GDC Caseworker 1's statement dated 21 May 2025 that on 20 November 2023 she received an email from a Corporate Dental Company confirming that Mr Sotiropoulos worked between March 2020 to 1 February 2022 at a Practice. The Committee has also had regard to the email from the Practice Manager to the GDC dated 28 May 2025 which attached a 47 page document showing the dates,</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

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|    | <p>length of appointment and type of treatment provided by Mr Sotiropoulos at the Practice between 31 January 2023 and 16 April 2023.</p> <p>The Committee notes from the GDC's guidance on indemnity (effective 30 September 2013) as well as the GDC's Standards for the Dental Teams which states that all practising dental professionals must have indemnity arrangements in place so that, where patients are entitled to receive compensation, registrants can meet this liability.</p> <p>Mr Foley's evidence was that a dentist must have indemnity for the entire period they are registered on the GDC's register. His opinion was that the certificates provided by Mr Sotiropoulos for the two periods in question are fake and concluded that during those periods Mr Sotiropoulos did not have indemnity cover as he was required to do.</p> <p>The Committee considers that Mr Foley has considerable expertise in the area of indemnity cover and insurance. It found his evidence to be credible and reliable. Having reviewed the various certificates provided, the Committee agrees with Mr Foley's expert opinion that the certificates provided to the GDC were fake.</p> <p>The Committee has therefore concluded on the balance of probabilities that Mr Sotiropoulos did not have adequate indemnity cover for those periods given that the only certificates he provided to the GDC, despite being asked repeatedly, were fake.</p> <p>Accordingly, the Committee finds these charges proved.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 5  | <p><i>You provided fake MDDUS indemnity certificates to the General Dental Council purporting to provide indemnity cover for the periods:</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 5a | <p><b>1 January 2020 to 31 January 2021</b><br/><b>Found proved</b></p> <p>Mr Foley's evidence was that certificates provided by Mr Sotiropoulos for the period 1 January 2020 to 31 January 2021 were fake. In support of that opinion, Mr Foley referred to the fact the Certificate of Membership for the dates in question does not have a Subscription amount, Admin Fee or a Total Subscription Amount entered into the relevant boxes on the Certificate. In Mr Foley's opinion, no insurer would issue a Certificate leaving the subscription and other boxes blank. He also referred to a short purple vertical line and to the right of that in very small font the words: "<i>sotirios Sotiropoulos</i>" and immediately underneath: "<i>Formatted: English (United States)</i>". He also commented that the 'From' and 'To' date boxes each had an additional box within them containing 01/01/2020 and 31/01/2021. In Mr Foley's view, this indicated that the certificate was for 13 months, whereas normal insurance custom and practice is that it issued on an annual basis for a period of 12 months.</p> <p>Mr Foley also referred to Caseworker 2's exhibit number 15 which deals with an email dated 24 February 2025 from Mr Sotiropoulos to the GDC in respect of another certificate from his parents, covering the same period. However, that Certificate of Membership with the dates from 1 January 2020 to 31 January 2021 is different from the certificate referred to above, although purporting to cover the same period. Mr Foley noted that the 'From' and 'To' date boxes had one additional box within them containing 1 January 2020 to 31 January 2021.</p> <p>In summary, it was Mr Foley's opinion that Mr Sotiropoulos provided two different documents purporting to evidence cover for the same period i.e. 1 January 2020 to 31 January 2021, and in his opinion, each document was regarded as "suspicious".</p> |

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|    | <p>The Committee has independently reviewed the two documents. It accepts Mr Foley's opinion that Mr Sotiropoulos provided fake indemnity certificates to the GDC purporting to cover indemnity for the period 1 January 2020 to 31 January 2021. Accordingly, it finds this charge proved.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 5b | <p><i>31 January 2023 to 16 April 2023</i><br/><b>Found proved</b></p> <p>Mr Folley's evidence was that there is a gap of one day between the MDDUS cover ending on 30 January 2023 and when the next MDDUS cover started on 1 February 2023. His opinion was that it is normal custom and practice that indemnity insurance is issued on an annual basis ie 12 months. In his opinion, the MDDUS would have issued the renewal policy from 31 January rather than 1 February 2023 so as not to cause a gap in coverage. Mr Folley was suspicious of this gap, particularly given that the MDDUS was likely to have an auto-renew feature, namely 12 months on a 'both days inclusive' basis. In Mr Folley's opinion, this situation was compounded by the fact that the MDDUS renewed Mr Sotiropoulos' period for only three months rather than a normal 12 month period</p> <p>Mr Folley's evidence was that Mr Sotiropoulos has produced three different documents purporting to evidence cover for the same period i.e. 1 February 2023 to 31 April 2023, with each of the three documents being regarded as suspicious. He referred to the anomalies around the subscription amount, the administrative fee as well as the anomaly about the address. In respect of the address. Mr Folley explained that the MDDUS changed its address on 1 November 2021 from Blythswood Street, Glasgow to St Vincent Street, Glasgow. He considered that it was highly unlikely that the MDDUS would have issued a statement in 2023 containing the old address of Blythswood Street.</p> <p>The Committee has independently reviewed the three documents. It accepts Mr Foley's opinion that Mr Sotiropoulos provided fake indemnity certificates to the GDC purporting to cover indemnity for the period 1 January 2020 to 31 January 2021. Accordingly, it finds this charge proved.</p> |
| 6  | <p><i>Your conduct at paragraph 5 above was:</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 6a | <p><i>Misleading</i><br/><b>Found proved</b></p> <p>The Committee has concluded that deliberately providing false documents to a third party (namely the GDC) by implication is misleading. They were created for the purpose of intending the GDC to believe that Mr Sotiropoulos had indemnity cover for the relevant periods when he knew that this was not the case.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 6b | <p><i>Dishonest, in that you knew the MDDUS certificates were fake and intended the General Dental Council to believe they were legitimate</i><br/><b>Found proved</b></p> <p>The Committee has concluded, on the balance of probabilities, that Mr Sotiropoulos knew that he did not have indemnity cover for the relevant periods and he knowingly took steps to provide the GDC with MDDUS certificates which were fake. This was for the purposes of misleading the GDC into believing that the MDDUS certificates were legitimate and that he was indemnified during those periods, when he knew that this</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

was not the case. The Committee has concluded that Mr Sotiropoulos' action in this regard was dishonest according to the objective standards of ordinary decent people.

The Committee has taken into account Mr Sotiropoulos' response in respect of indemnity coverage, as set out in his email to GDC Caseworker 2. In that email Mr Sotiropoulos states: *"I fully understand the claims about 'dishonest' and 'misleading about my indemnity coverage for the 2-3 months period mentioned and I am willing to accept any decision-penalty for this timescale."*

The Committee is satisfied that Mr Sotiropoulos' conduct was dishonest according to the two limbs set out in *Ivey v Genting Casinos (UK) Ltd t/a Crockfords* [2017] UKSC 67.

Accordingly, it finds this charge proved.

26. We move to stage 2 of the proceedings

### **Stage Two of the hearing**

27. 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 Sotiropoulos' 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 Sotiropoulos' registration. The Committee has kept in mind the submissions made by Mr Micklewright on behalf of the GDC in relation to these matters.

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

29. 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 Sotiropoulos' fitness to practise history**

30. Mr Micklewright confirmed that Mr Sotiropoulos has no fitness to practise findings against him. He advised that there is no interim order currently on Mr Sotiropoulos' registration in relation to these matters.

### **Summary of the GDC's submissions**

31. It was Mr Micklewright's submission that the matters found proved, both in relation to the treatment of Patient A (the clinical matters) and the lack of indemnity and the dishonesty findings arising from that (the non-clinical matters), are sufficiently serious to amount to misconduct. In respect of the clinical treatment of Patient A, Mr Micklewright highlighted a number of features of this case, including Mr Sotiropoulos' failure to obtain valid consent for the treatment, his failure to treat her with dignity and respect and his poor record keeping. Whilst acknowledging that the clinical shortcomings concern one patient only, essentially involving one course of treatment, Mr Micklewright submitted that the treatment took place over a number of appointments and involved numerous breaches of the *GDC's Standards for the Dental Team*.

32. Mr Micklewright referred the Committee to the notes of an interview with a Clinical Adviser to the Practice on 16 June 2023 with Mr Sotiropoulos concerning personal matters (not related to the

allegations in this case). The GDC submitted that these matters do not justify Mr Sotiropoulos' behaviour towards Patient A which occurred around the time of the interview. Further, the provision of the fake MDDUS certificates to the GDC took place well after the interview in June 2023.

33. Mr Micklewright submitted that Mr Sotiropoulos' failure to have adequate indemnity cover from January 2020 to January 2021 and from January 2023 to April 2023 is serious. This failure was compounded by Mr Sotiropoulos' conduct in providing fake MDDUS indemnity certificates to the GDC as part of its investigation into his fitness to practise. It involved planned and deliberate acts of dishonesty in the context of an ongoing GDC fitness to practise investigation. It would have been open to Mr Sotiropoulos to have been honest and admit to the GDC that he did not have indemnity cover for the periods in question but he did not do so; instead he knowingly submitted fake indemnity certificates to the GDC.

34. Mr Micklewright submitted that Mr Sotiropoulos' dishonest conduct is a serious departure of the GDC's '*Standards for the Dental Team*' and strikes at the heart of the GDC's role and function. He cited a number of the GDC's *Standards of the GDC's Standards for the Dental Team* which are engaged in this case in relation to the clinical and non-clinical matters.

35. Mr Micklewright submitted that Mr Sotiropoulos' fitness to practise is currently impaired by reason of misconduct on the grounds of the protection of the public and the wider public interest. In support of that contention Mr Micklewright referred to the absence of any insight or remediation, as well as Mr Sotiropoulos' disengagement in these proceedings. Mr Micklewright submitted that it was still open to Mr Sotiropoulos to practise as a dentist in the UK notwithstanding his stated intention dated 6 August 2026 that he was "*not interested in working in the UK*". In short, the GDC's position is that Mr Sotiropoulos continues to pose a risk to the public in relation to the clinical matters and the dishonest conduct.

36. Mr Micklewright further submitted that a finding of current impairment on the grounds of the wider public interest is necessary given the serious nature of the dishonesty.

37. Mr Micklewright addressed the Committee in relation to the mitigating and aggravating features in this case. In respect of the dishonest conduct, it was Mr Micklewright's submissions that this fell at the higher end of the spectrum of seriousness and that when looking at the case as a whole, the most appropriate and proportionate sanction in this case is that of erasure. He referred the Committee to the relevant sections of the GDC's '*Guidance for the Practice Committees including Indicative Sanctions Guidance*' (January 2026) (the GDC's guidance) during his submissions.

### **Misconduct**

38. The Committee has had regard to its factual findings. In relation to the clinical matters relating to the treatment of Patient A, it has found proved that between 17 April 2023 and 14 June 2023, Mr Sotiropoulos failed to provide an adequate standard of treatment to Patient A, in particular the UL7; this included a failure to assess the relationship of the UL7 to adjacent teeth and to the opposing dentition; a failure to take a periapical radiograph of the UL7 and a failure to obtain valid consent for treatment. It also found proved that Mr Sotiropoulos failed to keep adequate clinical records at appointments between 6 March 2023 and 14 June 2023. Finally, the Committee has found that during these appointments Mr Sotiropoulos failed to treat Patient A with dignity and respect. This included belittling her and speaking over her.

39. The Committee has had regard to Dr Simons' overall assessment of the case, as set out in her report dated 22 June 2026. She opined that the standard of care provided by Mr Sotiropoulos from 6 March 2023 to 14 June 2023 in respect of the clinical matters above (save for the matter in relation to his failure to treat Patient A with dignity and respect, which she was not in a position to opine on) fell far below the standard expected of a reasonably competent dentist. The Committee agrees with Dr Simons' opinion. It considers that obtaining patient consent is a cornerstone of the

patient-dentist relationship and that Mr Sotiropoulos' repeated failure to obtain informed consent from Patient A is very serious. This was in a situation where the crown treatment at the UL7 was repeatedly failing. Further, the Committee considers that Mr Sotiropoulos' failure to treat Patient A with dignity and respect at her dental appointments is serious. The Committee heard from Patient A that she was experiencing pain and having to re-attend appointments.

40. The Committee has borne in mind the reference to the health of a close family member of Mr Sotiropoulos, as documented in the notes of a meeting at the Practice in June 2023. However, the Committee considers that these circumstances do not provide a sufficient explanation for Mr Sotiropoulos' multiple failings which took place at a number of appointments with Patient A.

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

- 1.1 *You must listen to your patients.*
- 1.2 *You must treat every patient with dignity and respect at all times.*
- 1.4 *You must take a holistic and preventative approach to patient care which is appropriate to the individual patient.*
- 2.1 *You must communicate effectively with patients – listen to them, give them time to consider information and take their individual views and communication needs into account.*
- 2.2 *You must recognise and promote patients' rights to and responsibilities for making decisions about their health priorities and care.*
- 2.3 *You must give patients the information they need, in a way they can understand, so that they can make informed decisions.*
- 3.1. *You must obtain valid consent before starting any treatment, explaining all the relevant options and the possible costs.*
- 3.2 *You must make sure that patients (or their representatives) understand the decisions they are being asked to make.*
- 3.3 *You must make sure that the patient's consent remains valid at each stage of investigation or treatment*
- 4.1 *You must make and keep contemporaneous, complete and accurate patient records.*

42. The Committee is satisfied that the findings relating to the standard of care provided by Mr Sotiropoulos to patient A over a period of some four months, involving several appointments, where the patient suffered harm, are sufficiently serious to amount to misconduct.

43. Turning to the non-clinical findings, the Committee has had regard to paragraph 86 onwards of the GDC's guidance regarding indemnity. It notes that it is the Registrant's responsibility to ensure that their indemnity cover is appropriate and maintained. The Committee has found that Mr Sotiropoulos failed to have the benefit of adequate indemnity cover between 1 January 2020 and 31

January 2021 and between 31 January 2023 and 16 April 2023. This was not a lack of cover for a short duration – it totalled a period of about fifteen and a half months, during which time Mr Sotiropoulos continued to treat patients. The Committee has had regard to the exhibits provided by the Practice Manager as part of their statement which details some 47 pages of clinical records where Mr Sotiropoulos was treating patients during the period between 31 January 2023 and 16 April 2023. In the Committee's judgement, this was not a situation where the lack of cover could be said to be accidental or inadvertent given that it took place on two separate occasions, and on each occasion, the period covered a number of months. The Committee has concluded that Mr Sotiropoulos' failure to have adequate indemnity cover over a period of some fifteen and a half months is serious and amounts to misconduct.

44. The Committee further considers that Mr Sotiropoulos' dishonest conduct in providing fake MDDUS indemnity certificates to the GDC is a serious matter. It would have been open to Mr Sotiropoulos to inform the GDC that he did not have indemnity cover for the dates in question. He did not do so and instead he provided the GDC with fake certificates in the knowledge that the information he provided was false.

45. The Committee has had regard to the following standards of the GDC's *Standards for the Dental Team* (September 2013) which it considers are relevant in the non-clinical matters in this case:

- 1.3 *You must be honest and act with integrity.*
- 1.8.1 *You must have appropriate insurance or indemnity in place to make sure your patients can claim any compensation to which they may be entitled (See our website for further guidance on what types of insurance or indemnity the GDC considers to be appropriate).*
- 1.8.2 *You should ensure that you keep to the terms and conditions of your insurance or indemnity and contact the provider as soon as possible when a claim is made. A delay in contacting the provider could disadvantage patients and may affect the level of help you receive from the provider.*
- 9.4: *You must co-operate with any relevant formal or informal inquiry and give full and truthful information*
- 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.*

46. The Committee considers that the dishonest conduct fell far short of the standards reasonably expected of a dentist. It has had regard to paragraph 93(f) of the GDC's guidance which sets out that an aggravating feature in respect of a lack of appropriate indemnity can include "*where the lack of cover is associated with dishonesty...*". The Committee is satisfied that the facts found proved in relation to the dishonesty amounts to misconduct.

47. Taking all these matters into account, both in relation to the clinical and the non-clinical findings, the Committee is satisfied that the facts found proved are serious and amount to misconduct

### **Decision on current impairment**

48. The Committee next considered whether Mr Sotiropoulos' 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.

49. The Committee takes the view that the clinical matters regarding Patient A are capable of being remedied such as by targeted CPD, reflective practice and evidence of embedded learning. However, the Committee has received no evidence from Mr Sotiropoulos to satisfy itself that the clinical shortcomings have been addressed. The Committee considers that the risk of repetition remains high.

50. Regarding the non-clinical matters, it would have been open to Mr Sotiropoulos to have taken out appropriate indemnity cover and provide evidence of this to the GDC, but he has not done so. He indicated, in an email to the GDC dated 17 July 2024, his recognition that the claims about 'dishonest' and 'misleading about [his] indemnity coverage' for a coverage of some 2-3 months may be made out, with consequences for him. However, the Committee considers that this statement does not go far enough in terms of his acceptance of wrong-doing, how his behaviour might impact on dental professionals and what steps he would take to act differently in the future. In the Committee's judgement, this raises concerns about Mr Sotiropoulos' insight into his dishonesty. The Committee considers that Mr Sotiropoulos is liable to act dishonestly in the future.

51. The Committee considers that Mr Sotiropoulos poses an ongoing risk to the public in relation to the clinical and non-clinical matters in this case and that a finding of current impairment is required on public protection grounds.

52. 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. It 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 had failed to treat a patient with dignity and respect; failed to obtain their informed consent for treatment; failed to have adequate indemnity cover over a prolonged period of time whilst still treating patients and who knowingly provided fake indemnity certificates in the context of their dealings with GDC. The Committee has determined that Mr Sotiropoulos' failure to have appropriate indemnity arrangements placed patients at potential risk of harm, and his dishonest conduct has brought the profession into disrepute and breached fundamental tenets of the profession. Accordingly, the Committee 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.

53. The Committee determined that Mr Sotiropoulos' fitness to practise is currently impaired by reason of his misconduct.

## **Decision on sanction**

54. Having found Mr Sotiropoulos' 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 Sotiropoulos' own interests. The Committee has no information as to Mr Sotiropoulos' current working arrangements save for his indication to the GDC dated 6 August 2026 that he is "*not interested in working in the UK.*"

55. The Committee considered the mitigating and aggravating factors in this case. In mitigation, the Committee took account of the following:

- No previous fitness to practise findings.

56. The Committee took into account the following aggravating factors:

- Actual harm to Patient A.
- Premeditated conduct in relation to the provision of the fake indemnity certificates to the GDC.
- Blatant disregard of the role of the GDC and the systems regulating the professions.

57. Taking 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 Sotiropoulos' registration or to issue him with a reprimand. Given the serious nature of the findings in this case, which includes a finding of dishonest conduct, and the identified risk of repetition, the Committee has concluded that taking no action or issuing a reprimand would not be sufficient for the protection of the public, nor would it satisfy the wider public interest.

58. The Committee next considered whether to impose conditions on Mr Sotiropoulos' registration. It is of the view that in theory, the clinical concerns relating to the treatment of Patient A can be addressed by way of conditions. However, it is aware from paragraph 265 of the GDC's PCC Guidance that "*Conditions will only be appropriate where there is reasonable confidence in the registrant's ability to comply with them*". The Committee is not satisfied that Mr Sotiropoulos would comply with conditions in view of his email to the GDC dated 6 August 2026 in which he states: "*I don't want to be updated! I'm not interested in working in the UK. Please stop disturbing me.*" Further, he has not engaged in these proceedings. The Committee is not satisfied that conditions would be sufficient to address the non-clinical concerns in this case, which relate to Mr Sotiropoulos' misleading and dishonest conduct towards the GDC. Given the seriousness of the dishonesty in this case, the Committee has concluded that conditions would not satisfy the wider public interest considerations.

59. The Committee went on to consider whether to suspend Mr Sotiropoulos' registration for a specified period. In doing so, it had regard to paragraph 277 of the GDC's 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).*

60. The Committee has concluded that factors a to c apply in this case. However, it considers that factor d is not applicable in this case given its conclusion that there is evidence of harmful deep-seated personality and professional attitudinal problems in light of the findings of dishonesty, which took place in the context of Mr Sotiropoulos' dealings with the GDC in respect of its repeated requests for evidence of his indemnity certificates.

61. Having taken all the matters in this case into account, the Committee has 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 is no evidence before the Committee to suggest that any period of suspension would result in any meaningful change in Mr Sotiropoulos' position or absence of insight.

62. The Committee considers that the dishonesty in this case falls at the higher end of the spectrum of seriousness given that it took place in the context of Mr Sotiropoulos' dealings with the GDC and involved him providing several fake MDDUS certificates to the GDC. Having regard to paragraph 282 of the GDC's Guidance (which deals with erasure) the Committee has 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.*

63. The Committee has determined that the only appropriate and proportionate sanction is erasure. It is satisfied that Mr Sotiropoulos' dishonest behaviour towards his regulator, his blatant disregard of the GDC's rules and regulation as well as his lack of insight is incompatible with being a registered dentist. Unless Mr Sotiropoulos 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.

64. The Committee will now invite submissions from Mr Micklewright as to whether to make an immediate order of suspension on Mr Sotiropoulos' registration.

### **Decision and reasons on immediate order**

65. Mr Micklewright, on behalf of the GDC, has made an application under section 30(1) of the Dentists Act 1984 for an immediate suspension order to be imposed on Mr Sotiropoulos' registration. He submitted that there is an ongoing risk of repetition of Mr Sotiropoulos' behaviour identified by the Committee (both in relation to the clinical and non-clinical matters) such that an order is necessary on the grounds of the protection of the public. He further submitted that an immediate order is required to maintain public confidence in the professions given the serious findings against Mr Sotiropoulos.

66. Mr Micklewright advised the Committee that there is currently an interim order of suspension on Mr Sotiropoulos' registration in relation to another matter under investigation. That interim order was first imposed on Mr Sotiropoulos' registration on 2 February 2026 for a period of 15 months and was last reviewed in July 2026 when the interim order of suspension was maintained. However, Mr Micklewright advised the Committee that the interim order may be revoked or changed to one of conditions before its expiry in May 2027. He submitted that it is not open to the GDC to apply for an immediate order at a later stage and that the only opportunity that the GDC can make an application for an immediate order in relation to these allegations is at this hearing. He therefore invited the Committee to make an immediate suspension order to cover the appeal period.

67. The Committee has accepted the advice of the Legal Adviser. During the course of that advice she referred to paragraphs 285 to 288 of the GDC's "Fitness to Practise: Guidance for the practice committees" (January 2026) which set out the basis of imposing an immediate order.

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

69. In its substantive determination, the Committee identified a risk of repetition of the behaviour, both in relation to the clinical and the non-clinical matters. In the circumstances, the Committee considered that it would be inconsistent not to impose an immediate order for the protection of the public.

70. 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. This includes a finding of dishonesty in the context of Mr Sotiropoulos' dealings with the GDC. 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.

71. The Committee is aware that there is currently an interim order of suspension on Mr Sotiropoulos' registration in relation to another matter under investigation. It is also aware that that interim order could be revoked or replaced with an interim order of conditions before the expiry of that order in May 2027. Given the gravity of this Committee's findings, and the possible change in the interim order of suspension in relation to another matter, the Committee is satisfied that an immediate order of suspension is necessary.

72. The effect of the foregoing substantive determination and this order is that Mr Sotiropoulos' registration will be suspended to cover the appeal period. Unless Mr Sotiropoulos exercises his right of appeal, the substantive direction for erasure will take effect 28 days from the date of deemed service. Should Mr Sotiropoulos exercise his right of appeal, this immediate order will remain in place until the resolution of the appeal.

73. That concludes this determination and the hearing of the case.