

PART-PRIVATE HEARING

Professional Conduct Committee Review Hearing

28 November 2025

Name: CORMACK, Savanna

Registration number: 280491

Case number: CAS-200907-L1K0R7

General Dental Council: Abimbola Johnson, Counsel
Instructed by Jalpa Patel, IHLPS

Registrant: Not present
Not represented

Fitness to practise: Impaired by reason of misconduct, conviction and health

Outcome: Suspension extended (with a review)

Duration: 9 Months

Committee members: Jane Everitt (Chair, Lay Member)
Jonathan Farmer (Dentist Member)
Leeann Sadler (Dental Care Professional Member)

Legal Adviser: Kenneth Hamer

Committee Secretary: Lola Bird

At this hearing the Committee made a determination that includes some private information. That information has been omitted from this public version of the determination, and this public document has been marked to show where private material has been removed.

1. This is a resumed hearing of Miss Cormack's case before the Professional Conduct Committee (PCC) pursuant to section 36Q of the *Dentists Act 1984 (as amended)* ('the Act').
2. The hearing is being conducted remotely by Microsoft Teams video-link.
3. The purpose of the hearing has been for the Committee to review a substantive order of suspension currently in place on Miss Cormack's registration. The order was first imposed following a PCC hearing in March 2024.
4. Miss Cormack is not present at the hearing, and she is not represented in her absence. The Case Presenter for the General Dental Council (GDC) is Ms Abimbola Johnson, Counsel.

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

5. Ms Johnson made an application under Rule 54 of the *GDC (Fitness to Practise) Rules 2006* ('the Rules'), to proceed with the hearing notwithstanding Miss Cormack's absence.
6. Ms Johnson drew the Committee's attention to the relevant documents in respect of service and in relation to the subsequent attempts made by the GDC to contact Miss Cormack regarding this hearing.
7. It was Ms Johnson's submission that significant attempts had been made by the Council to contact Miss Cormack. Further, Ms Johnson submitted, that this is a review hearing, and as such, Miss Cormack has been on general notice since last year that there would be a scheduled review. Ms Johnson highlighted that Miss Cormack did not attend the previous PCC hearings of her case and submitted that there had been a sustained pattern of Miss Cormack not attending GDC hearings. In all the circumstances, Ms Johnson invited the Committee to proceed in Miss Cormack's absence.
8. The Committee took account of Ms Johnson's submissions, and the supporting documentation provided. It accepted the advice of the Legal Adviser in relation to service and proceeding with a hearing in the absence of a registrant.

Decision on service

9. The Committee considered whether notice of the hearing had been served on Miss Cormack in accordance with Rules 28 and 65 of the Rules and section 50A of the Act.
10. The Committee had before it a copy of the Notice of Hearing, dated 24 September 2025 ('the notice'), which was sent to Miss Cormack's registered address by Special Delivery and First Class post. A copy of the notice was also sent to her by email.

11. The Committee took into account that there is no requirement within the Rules for the GDC to prove delivery of the notice, only that it was sent. It received a copy of the Royal Mail 'Track and Trace' receipt, which confirmed the sending of the notice to Miss Cormack.

12. The Committee noted that the requirement under section 50A(2)(a) of the Act is to send notice to a registrant's registered address as held by the GDC. The Committee was satisfied on the information before it, that the GDC complied with this requirement. However, it noted that Miss Cormack sent an email to the GDC dated 21 October 2025 regarding some other forms that had been sent to her in respect of this case, and she indicated in that email that she had a new registered address. In the light of this, the GDC sent a fresh notice in respect of this hearing, dated 20 October 2025, to Miss Cormack's new address by Special Delivery and First Class post. A copy was also sent to her by email. The Royal Mail 'Track and Trace' receipt in respect of the fresh notice indicates that the copy sent by Special Delivery was delivered to the address on 22 October 2025.

13. The Committee took into account the Legal Adviser's advice in relation to section 50A(2)(b) of the Act, which states that notification of a hearing may be served at a registrant's last known address if it appears that the notification is more likely to reach her at that address.

14. The Committee was satisfied that the both notices sent to Miss Cormack complied with the 28-day notice period required by the Rules. It was further satisfied that the notices contained all the required particulars, including the date and time of the hearing, and that it was intended that the hearing would take place remotely by Microsoft Teams video-link. Miss Cormack was also advised that the Committee had the power to proceed with the hearing in her absence.

15. On the basis of all the information provided, the Committee was satisfied that notice of the hearing had been served on Miss Cormack in accordance with the Rules and the Act.

Decision on proceeding with the hearing in the absence of the registrant

16. The Committee next considered whether to exercise its discretion under Rule 54 to proceed with the hearing in the absence of Miss Cormack. It approached this issue with the utmost care and caution. The Committee took into account the factors to be considered in reaching its decision, as set out in the case of *R v Jones* [2002] UKHL 5, and as affirmed in subsequent regulatory cases.

17. The Committee bore in mind that fairness to Miss Cormack is an important consideration. It was also mindful of the need to be fair to the GDC, and of the public interest in the expeditious review of the order currently in place on Miss Cormack's registration.

18. The Committee was satisfied that all reasonable efforts had been made by the GDC to notify Miss Cormack of this hearing. It noted the considerable attempts made by the Council to contact her between 20 October and 26 November 2025, including by telephone with messages left. There has been no response from Miss Cormack to those communications. The Committee was further satisfied that Miss Cormack is aware of these ongoing proceedings before the GDC. It noted that she has engaged intermittently with the GDC regarding this case, including as recently as September of this year. However, there is no information before the Committee today as to the nature and circumstances of Miss Cormack's absence.

19. In all the circumstances, it was the view of the Committee that adjourning the hearing would serve no meaningful purpose. Miss Cormack has not contacted the GDC to request an adjournment, and there is no indication that deferring the hearing would secure her attendance on a future date. The Committee noted that she did not attend the two previous PCC hearings of her case.

20. The Committee took into account that it had a statutory duty to review the suspension order currently in place on Miss Cormack's registration, which is shortly due to expire. The Committee considered that without good reason for an adjournment, today's hearing should go ahead as scheduled. The Committee was satisfied that it was fair and in the public interest to proceed with the hearing in the absence of Miss Cormack.

Decision on application to hold the hearing partly in private

21. Ms Johnson next made an application under Rule 53 of the Rules for the hearing to be part-heard in private, as some of the matters to be considered would involve reference to Miss Cormack's health. Ms Johnson applied for those health matters to be heard in private.

22. In acceding to the application, the Committee accepted the advice of the Legal Adviser regarding its discretion under Rule 53 to hold all or part of a hearing in private. The Committee bore in mind that, as a starting point, hearings should be conducted in public session. However, it took into account that matters of health would be discussed at this hearing, and it was satisfied that it would be appropriate to hear those matters in private under Rule 53(2)(a) for the protection of Miss Cormack's family and private life.

Case background

23. Miss Cormack's case was first considered by a PCC at a hearing from 25 to 27 March 2024. She was neither present nor represented at that hearing. That initial Committee in 2024 considered and found proved the following allegations against Miss Cormack:

- On 23 May 2022, Miss Cormack was convicted at Newton Aycliffe Magistrates' Court of driving a motor vehicle on 17 April 2022, after consuming alcohol exceeding the prescribed limit, contrary to section 5(1)(a) of the Road Traffic Act 1988 and Schedule 2 of the Road Traffic Offenders Act 1988.
- Miss Cormack failed to immediately inform the GDC that on or around 17 April 2022, she was charged with the offence which led to her conviction as outlined above.
- Ms Cormack had an adverse health condition [PRIVATE].

24. The initial Committee determined that Miss Cormack's failure to immediately inform the GDC that she had been charged with a criminal offence amounted to misconduct. That Committee further determined that Miss Cormack's fitness to practise was impaired both on public protection and public interest grounds, by reason of her misconduct, her conviction, and her adverse health. In finding impairment on all three bases, the initial Committee in March 2024 stated the following in its determination:

“Conviction

Ms Cormack has not engaged in these proceedings and has not put forward any evidence to demonstrate remediation. The Committee has seen nothing that shows that she has insight into the seriousness of her conviction or the potential impact of her actions on safety to other road users or public confidence. Ms Cormack drove on public roads having consumed alcohol. She placed not only herself but other road users at risk of injury.

The Committee took account of the fact that Ms Cormack received her conviction in 2022 and there is no evidence that she has received a further conviction since. However, the Committee noted that this is a conviction that took place less than 2 years after a similar offence and just over 2 months after Ms Cormack had been formally warned by the [GDC’s Case Examiners] in relation to her first conviction...

Misconduct

In relation to Ms Cormack’s misconduct the Committee was of the view that it is capable of remedy. It considered that Ms Cormack would need to embark on meaningful engagement with the GDC, which would include an explanation for her sporadic engagement to date and show evidence of insight, remorse and steps taken to prevent recurrence. However, the Committee has received no information on her current circumstances and importantly no evidence of insight on Ms Cormack’s part. Whilst the Committee has not drawn any adverse inference from Ms Cormack’s absence from this hearing, the current factual position is that her lack of engagement is ongoing. There is nothing before the Committee demonstrating insight into the seriousness of the delay in informing the GDC of the charge.

It is therefore satisfied that there is a real risk of repetition of her misconduct in the future. Her misconduct involved a disregard of her obligations to her regulatory body...

Health

[PRIVATE]”.

25. By way of a sanction, the initial Committee imposed a suspension order on Miss Cormack’s registration for a period of 9 months, with a review of the order to take place shortly before the end of this period. In directing a review, that Committee stated that the reviewing Committee may be assisted by receiving the following:

- A detailed reflective statement demonstrating Ms Cormack’s insight into and understanding of her conviction and misconduct and its impact on the dental profession and the public confidence.
- Evidence of engagement with the GDC.
- Up to date medical evidence relating to Ms Cormack adverse health condition.

First resumed hearing – November 2024

26. A resumed hearing of Miss Cormack's case was held on 21 November 2024, when a PCC conducted a review of the suspension order imposed in March 2024. Miss Cormack was neither present nor represented at that resumed hearing.

27. The Committee in November 2024 determined that Miss Cormack's fitness to practise remained impaired by reason of her misconduct, conviction and adverse health. It stated the following in its determination:

“The Committee noted that there has been no change since the conclusion of the substantive hearing. The Committee bore in mind that the burden was on Miss Cormack to satisfy the Committee that her fitness to practise is not currently impaired. However, she has not engaged with these proceedings and has communicated to the GDC that she wishes to voluntarily remove her name from the register. Miss Cormack has provided no evidence of remediation for consideration by this Committee, including the evidence recommended at the substantive hearing. [PRIVATE]. Furthermore, she has provided no evidence of insight into her health condition, her conviction or misconduct. The Committee, therefore, concluded that there remains a risk of repetition of the failings found proved and that a finding of impairment was necessary in the interests of public protection...”

28. The Committee in November 2024 directed that the suspension order on Miss Cormack's registration should be extended by a period of 12 months. That Committee was of the view that *“...this period would allow Miss Cormack to provide any evidence of remediation or insight into her conviction, misconduct and adverse health”*. It directed a further review to be conducted shortly before the end of the 12 month period, and reiterated the recommendations of the initial PCC that the future reviewing Committee may be assisted by the following:

- A detailed reflective statement demonstrating Ms Cormack's insight into and understanding of her conviction and misconduct and its impact on the dental profession and the public confidence.
- Evidence of engagement with the GDC.
- Up to date medical evidence relating to Ms Cormack adverse health condition.

Today's resumed hearing – November 2025

29. This is the second review of the suspension order first imposed on Miss Cormack's registration in March 2024.

30. In comprehensively reviewing the order today, the Committee considered all the evidence before it. It took account of the submissions made by Ms Johnson on behalf of the GDC.

31. Ms Johnson submitted that Miss Cormack has not engaged with the GDC in any meaningful way since the last PCC hearing, other than to contact the GDC regarding her change of registered address. Ms Johnson referred again to the extent to which the GDC tried to engage Miss Cormack in these proceedings [PRIVATE].

32. Ms Johnson asked the Committee to note that despite Miss Cormack stating that she would reply to the emails sent to her by the GDC, she did not do so. Ms Johnson highlighted that further unsuccessful attempts were made to contact Miss Cormack after the telephone conversation of 11 November 2025. [PRIVATE].

33. It was Ms Johnson's submission that the picture before the Committee today is that Miss Cormack has not engaged with the significant opportunities to secure her participation in these proceedings. [PRIVATE]. However, Ms Johnson submitted that some further evidence had been received since the last PCC hearing, and in this regard she referred the Committee in detail to the information provided to the GDC on 26 November 2025 [PRIVATE].

34. [PRIVATE].

35. [PRIVATE].

36. Ms Johnson submitted in respect Miss Cormack's health that [PRIVATE]. In relation to the other aspects of Miss Cormack impairment, as determined by the previous PCCs, Ms Johnson submitted that there was no reflective material before this Committee in relation to Miss Cormack's misconduct or her conviction. Ms Johnson submitted that this was despite the previous Committee's recommendations to Miss Cormack.

37. It was Ms Johnson's submission that the concerns of the previous PCCs remain current. She invited the Committee to extend the current order of suspension on Miss Cormack's registration for a period of 12 months, with a review as there was no clear picture as to [PRIVATE] and the concerns in relation to the misconduct and conviction issues have not been addressed.

The Committee's decisions

38. In reaching its decisions, the Committee accepted the advice of the Legal Adviser in relation to its powers under section 36Q(1) of the Act, the relevant legal principles to be applied and the approach it should take in conducting its review.

Decision on current impairment

39. The Committee first considered whether Miss Cormack's fitness to practise remains impaired by reason of her misconduct, conviction and her adverse health. In doing so, it exercised its independent judgement. It had regard to the overarching objective of the GDC, which is: the protection, promotion and maintenance of the health, safety, and well-being of the public; the promotion and maintenance of public confidence in the dental profession; and the promotion and maintenance of proper professional standards and conduct for the members of the dental profession.

40. The Committee respectfully disagrees with the earlier review Committee that the burden is on Miss Cormack "to satisfy the Committee that her fitness to practise is not currently impaired". The authorities make clear that the review Committee should note the particular concerns articulated by the original Committee and seek to discern what steps, if any, the registrant has taken to allay them during the period of their suspension: see *Khan v General Pharmaceutical Council* [2016] UKSC 64 at [27]. The case of *Abrahaem v General Medical Council* [2018] EWHC 183 (Admin) was a case

concerning conditions in which the court said at [23] in practical terms there is a persuasive burden on the practitioner at a review to demonstrate that they have sufficiently addressed the past impairments. Ultimately, it is a matter for the Committee to be satisfied whether the registrant's fitness to practise remains impaired.

41. The Committee considered the grounds of impairment individually. In reaching its decisions, it had regard to the concerns highlighted by the previous Committees and considered whether those issues have been addressed.

Conviction

42. The Committee took into account that there is no evidence before it that Miss Cormack had received any further convictions since her last conviction in April 2022. It considered this lapse of time as part of its assessment on the risk of repetition.

43. However, the Committee also took into account the further information received by the GDC on 26 November 2025, which it considered raised an issue of concern. [PRIVATE].

44. In addition, the Committee took into account the absence of any evidence of remorse, insight or reflection on the part of Miss Cormack in relation to her conviction.

45. Therefore, notwithstanding that there is no evidence of any conviction since 2022, the Committee could not be reassured that the risk of repetition is low. Accordingly, it determined that a finding of current impairment is necessary for the protection of the public. In reaching its decision, the Committee noted the nature of Miss Cormack's conviction and the risk she posed to others through her conduct.

46. The Committee also determined that a finding of current impairment is in the wider public interest. In view of the further evidence received and given the absence of any evidence of Miss Cormack's insight into the seriousness of her conviction, the Committee concluded that public confidence in the dental profession would be undermined if a finding of impairment were not made in the circumstances. The Committee also had regard to the need to declare and uphold proper professional standards.

Misconduct

47. Miss Cormack's engagement with the GDC has been intermittent and sporadic. Whilst she has communicated with the GDC on certain matters concerning this case, she has not engaged sufficiently with this hearing. Consequently, there is no evidence before the Committee regarding Miss Cormack's insight into her failure to immediately report her criminal conviction to the GDC. In the light of this, the Committee considered that the concerns raised by the previous Committees in relation to the issue of Miss Cormack's misconduct have not been addressed.

48. Accordingly, the Committee determined that a finding of current impairment remains necessary for the protection of the public. Failing to notify the GDC about criminal proceedings and

any subsequent convictions poses a risk to the GDC being able to assess the seriousness of the matter and whether a registrant is safe to continue practising.

49. The Committee further determined that a finding of current impairment is in the wider public interest. Given the absence of any evidence of Miss Cormack's insight into the serious nature of her misconduct, the Committee considered that public confidence in the dental profession would be undermined if a finding of impairment were not made in the circumstances. The Committee also had regard to the need to declare and uphold proper professional standards.

Health

50. [PRIVATE].

51. [PRIVATE].

52. In the light of all this information, the Committee was not satisfied that there is sufficient evidence that [PRIVATE]. It therefore concluded that the concerns of the previous Committee in relation to Miss Cormack's health remain.

53. Accordingly, the Committee determined that a finding of current impairment remains necessary for the protection of the public. [PRIVATE].

54. The Committee also determined that a finding of current impairment is in the wider public interest. It considered that public confidence in the dental profession would be undermined if a finding of impairment were not made in the circumstances where the adverse health matters in this case remain a current concern.

55. Having taken all the evidence into account, the Committee determined that Miss Cormack's fitness to practise remains impaired by reason of her conviction, misconduct and adverse health.

Decision on sanction

56. The Committee next considered what action to take in respect of Miss Cormack's registration. It had regard to section 36Q(1) of the Act, which sets out the options available to it at this review. The Committee also took into account the '*Guidance for the Practice Committees including Indicative Sanctions Guidance (effective from October 2016; last revised December 2020)*'. It noted that the purpose of any sanction is not to be punitive, although it may have that effect, but to protect the public and the wider public interest. The Committee applied the principle of proportionality, balancing the public interest with Miss Cormack's interests.

57. The Committee considered that it would not be appropriate to terminate the suspension order currently in place on Miss Cormack's registration or to allow it to lapse. It has identified ongoing risks in this case, and it considered that neither course of action would sufficiently protect the public or the wider public interest.

58. The Committee next considered whether it could replace the current suspension order with a conditions of practice order. It concluded, however, that conditions would not be workable at this

time, given the issues around Miss Cormack's engagement with the GDC in relation to all the matters that have been identified. The Committee was not confident that Miss Cormack would presently be able to comply with conditions even if they could be imposed.

59. In all the circumstances, the Committee determined to extend the current order of suspension on Miss Cormack's registration for a period of 9 months. Whilst it took into account the submission of the GDC for a 12 month period, it considered that 12 months would be too long a timeframe in the context of this case, which requires a review of Miss Cormack's health. However, the Committee considered that there is still a considerable amount of progress that needs to be made in relation to the health matters and in relation to Miss Cormack's insight into her misconduct and conviction. Taking this into account, the Committee considered that a 9 month period is sufficient and proportionate.

60. The Committee directs that a review of the order of suspension should take place at a resumed hearing to be held shortly before the end of the 9 month period. Miss Cormack will be informed of the date and time of that resumed hearing. In directing a further review, this Committee considers that a future reviewing Committee may find it helpful to receive the following:

- Evidence of sufficient engagement by Miss Cormack with the GDC in respect of these proceedings.
- Up to date medical evidence relating to Ms Cormack's adverse health condition, [PRIVATE].
- Any information that Miss Cormack wishes to place before the Committee including evidence regarding her insight into all the matters in this case, including her misconduct and her conviction.

61. Unless Miss Cormack exercises her right of appeal, the current order of suspension on her registration will be extended by a period of 9 months, 28 days from the date that notice of this direction is deemed to have been served upon her. In the event that she does exercise her right of appeal, the order of suspension currently in place on her registration will remain in force until the resolution of the appeal.

62. That concludes this determination.