

PUBLIC RECORD

Dates: 28/08/2026

Doctor: Dr Patrick HART**GMC reference number:** 7081937**Primary medical qualification:** MB BCh 2010 Cardiff University

Type of case	Outcome on impairment
Review - Misconduct	Impaired
Review - Conviction	Impaired

Summary of outcome

Suspension, 10 months

Tribunal:

Legally Qualified Chair	Mrs Sarah Hamilton
Registrant Tribunal Member:	Dr Alison Calver
Registrant Tribunal Member:	Dr Richard Whiteside
Tribunal Clerk:	Mr Joel Taylor-Garratt

Attendance and Representation:

Doctor:	Present, not represented
GMC Representative:	Mr Richard Flook, Counsel

Attendance of Press / Public

In accordance with Rule 41 of the General Medical Council (Fitness to Practise) Rules 2004 the hearing was held in public.

Protecting the Public

Throughout the decision making process the tribunal has borne in mind the statutory duty as set out in s1(1) of the Medical Act 1983 (the 1983 Act) to protect the public. The tribunal has considered the relevance and impact on each of the three distinct parts of public protection to protect, promote and maintain the health, safety and well-being of the public, to promote and maintain public confidence in the medical profession, and to promote and maintain proper professional standards and conduct for members of that profession.

Determination on Impairment - 28/08/2026

1. At this review hearing the Tribunal has to decide, in accordance with Rule 22(1)(f) of the Rules, whether Dr Hart's fitness to practise remains impaired by reason of misconduct and conviction.

Background

2. Dr Hart qualified as a doctor in 2010 and, at the time of the events, was practising as a GP at Bridge View Medical Practice, Bristol.
3. On 13 April 2022, Dr Hart participated in a protest at the Exolum Pumping Station, Grays Terminal, where he and others climbed onto elevated pipework to disrupt the terminal's operations. On 1 November 2022, he was convicted at Chelmsford Magistrates' Court of aggravated trespass, having obstructed or intended to disrupt the storage and transportation of fuel, and was fined £500.
4. On 24 August 2022, Dr Hart participated in a further protest at an Esso Service Station in Thurrock, interfering with vehicular access to the forecourt in breach of a High Court injunction. During the protest, he damaged petrol pumps using a hammer and orange spray paint. On 18 November 2022, Mr Justice Bourne held that this conduct amounted to contempt of court and considered it more serious than that of the other protesters. The judge found the conduct premeditated and beyond the bounds of peaceful protest, noting that it caused the forecourt to close until 6:00 p.m., left three quarters of the pumps unusable for 24 hours and caused economic loss. Dr Hart was sentenced to four months' imprisonment, suspended for two years, and fined £2,000. He subsequently self-referred to the GMC on 4 September 2022 and indicated that he did not intend to breach further injunctions.

5. The same 24 August 2022 incident also resulted in a criminal conviction. On 29 October 2024, Dr Hart was convicted at Chelmsford Crown Court of criminal damage to property valued at approximately £11,000, contrary to section 1(1) of the Criminal Damage Act 1971. On 7 January 2025, His Honour Judge Mills sentenced him to 12 months' immediate imprisonment. The judge regarded the offence as one of high culpability, citing its deliberate and pre-planned nature, the fact that Dr Hart had attended equipped to cause damage and disrupt sales, the significant financial loss and public risk, his lack of remorse, his offending history, and the fact that the offence was committed while he was on bail.

2025 Tribunal

6. A Medical Practitioners Tribunal (MPT) to consider Dr Hart's case took place from 13 October to 20 October 2025 ('the 2025 Tribunal').
7. The 2025 Tribunal determined that Dr Hart's fitness to practise was impaired by reason of his misconduct and conviction. It decided to suspend Dr Hart's registration for a period of 10 months.
8. The 2025 Tribunal stated that it might assist this reviewing Tribunal if Dr Hart were to provide evidence of continued professional development and maintenance of clinical skills, ensuring that Dr Hart had remained competent and up to date in his practice. The Tribunal also noted that any review hearing would provide an opportunity for Dr Hart to produce evidence of insight and remediation, particularly regarding how he could continue to engage in climate activism in a lawful and responsible manner, consistent with GMP, whilst maintaining public confidence in the profession.

Today's Review

9. This is the first review of Dr Hart's case. The Tribunal now has to decide in accordance with Rule 22(1)(f) of the Rules whether Dr Hart's fitness to practise remains impaired by reason of his misconduct and conviction.

Evidence

10. The Tribunal has taken into account all of the evidence received. The Tribunal had regard to the documentary evidence provided by the parties. This evidence included, but was not limited to, the Record of Determination from the 2025 Tribunal hearing and various correspondence from the GMC to Dr Hart. No new documentary evidence was submitted by Dr Hart.

11. Dr Hart gave oral evidence at the hearing. He told the Tribunal that there was an impasse as he was committed to his position that he acted in good faith and with integrity. He said that the suffragettes, now celebrated in society, acted in a similar way to resist unjust laws and effect change.
12. Dr Hart highlighted various elements of the current climate crisis including widespread drought, fires and failed crops across Europe and the rest of the world. He said that the situation was worsening at an increasing rate and that he acted to try and stop this crisis. Dr Hart told the Tribunal that others like him were being acquitted by juries and that this indicated that some members of the public would not be concerned by his actions or conviction.
13. Dr Hart said that suspending doctors who were convicted for protesting climate collapse was not an act that protects the public.
14. Dr Hart told the Tribunal that practising medicine had given his life meaning and balance against his larger concerns. He said that he maintains some dignity in the knowledge that he did what he could to prevent climate collapse and in not backing down from that conviction. He said it would be a lie for him to agree that his actions were wrong. He said that he considered his insight to be excellent.
15. Dr Hart said that he had taken no further part in climate activism that risks arrest because he does not want to spend the rest of his life in prison and the imposition of draconian laws restricting protest has made it ineffectual. He said that he does not have access to resources to properly maintain his skills and knowledge other than reading for his own interest but that, in any case, he had no interest in providing such evidence to the Tribunal while it would find him impaired because of his lack of insight.

Submissions

Submissions on behalf of the GMC

16. Mr Flook, Counsel, submitted that there was no material change from the 2025 Tribunal and that Dr Hart's fitness to practise remains impaired. He submitted that Dr Hart's motivation and conviction for his actions are not necessarily relevant factors. He said that, despite Dr Hart's statement that he has not engaged in any more illegal climate activism, there was no evidence to suggest that the risk of him doing so in the future was reduced. Mr Flook submitted that the risk to public protection remained at a medium level.

17. Mr Flook submitted that Dr Hart had provided no evidence of having kept his skills and knowledge up to date, had not developed his insight and had not provided meaningful remediation.
18. Mr Flook submitted that public confidence and professional standards required doctors to act within the law. He said that Dr Hart's criminal actions undermined public confidence, which would be further undermined if he were to be permitted to practise unrestricted. Mr Flook also submitted that Dr Hart's sincerely held beliefs could not justify breaching the law and that the promotion of proper professional standards required a finding of impairment.

Dr Hart

19. Dr Hart submitted that his beliefs were not beliefs but physics, and these would have disastrous impacts regardless of anyone's beliefs.
20. Dr Hart said that, despite being an otherwise law abiding citizen, to act with integrity included sometimes choosing to break certain laws in the interest of effecting change. He said that the recent heatwaves in the UK and Europe had put an increased pressure on health services and that this would continue to get worse.
21. Dr Hart also spoke about the disproportionate impact of the climate crisis on children, who are being harmed by lawmakers making decisions not in the interest of future generations. He apologised to future generations for not being able to prevent the climate crisis but said he had done what he could.

The Relevant Legal Principles

22. The Tribunal had regard to the Guidance for MPTS Tribunals > Section three: MPT hearings - review hearings (22 June 2026).
23. Throughout the decision-making process, the Tribunal bore in mind the GMC and MPTS' legal duty as set out in Section 1 of the Medical Act 1983 to protect the public, which is split into three distinct parts. It means that a Tribunal must act in a way that: protects, promotes and maintains the health, safety and well-being of the public ('patient safety'); promotes and maintains public confidence in the medical profession ('public confidence'); and promotes and maintains proper professional standards and conduct for members of the profession ('uphold professional standards').

24. The Tribunal reminded itself that the decision of impairment is a matter for the Tribunal's judgement alone.
25. This Tribunal must assess whether Dr Hart poses any current and ongoing risk to one or more of the three parts of public protection requiring restrictive action in response. It must be made with reference to the findings of the 2025 Tribunal as well as any relevant new evidence presented at this hearing. The Tribunal must determine whether Dr Hart's fitness to practise is impaired today, taking into account his conduct at the time of the events and any relevant factors since then, such as whether the matters are remediable, have been remedied and any likelihood of repetition.

What was the 2025 Tribunal's assessment of risk to public protection and the reasons given for it?

26. The Tribunal noted that the 2025 Tribunal hearing took place before the imposition of the new Guidance for MPTS Tribunals. Therefore the 2025 Tribunal did not specifically state the level of risk that it considered the doctor posed in terms of one or more of the three parts of public protection. This does not preclude this Tribunal from considering what the level of risk posed by Dr Hart was and whether the level has now changed.

What new evidence has been received since the 2025 Tribunal hearing and what impact does it have?

27. The Tribunal had regard to the factors identified by the 2025 Tribunal as potentially assisting a future review. In particular, the 2025 Tribunal had identified the importance of providing evidence of Dr Hart keeping his skills and knowledge up to date, and of his developed insight into lawful protest.
28. Dr Hart had not provided any of the evidence identified by the 2025 Tribunal. There was no documentary evidence of relevant courses or other CPD, nor any statement relating to Dr Hart's insight or remediation.
29. The Tribunal considered that the absence of such evidence was significant when assessing the extent of Dr Hart's insight, remediation and current fitness to practise.
30. The Tribunal bore in mind Dr Hart's oral evidence and submissions, particularly that he would not back down from his opinions and that he considered acting with integrity to include sometimes choosing to break certain laws in the interest of protecting against the climate crisis.

What evidence is there of insight and is Dr Hart's insight genuine?

31. The Tribunal considered that Dr Hart's opinions regarding climate change were sincere and deeply held. However, it considered that he had shown no insight into the negative impact of his misconduct or conviction on public confidence or on the profession. Dr Hart was candid in stating his position that he believed he had done nothing wrong and that he was at an impasse with his regulator. The Tribunal considered that Dr Hart had shown contempt both for certain laws and the Tribunal process, having made it clear that he thought both were wrong to be punishing him.
32. The Tribunal determined that Dr Hart had demonstrated no insight into his misconduct and conviction, despite his belief that his insight was excellent.

What evidence is there relating to remediation, has the Allegation now been remedied or is it still likely to be repeated?

33. The Tribunal found that there was no evidence of relevant remediation. Dr Hart maintained his position that his actions were justified.
34. The Tribunal noted that Dr Hart said he had not engaged in any other activity that risked arrest but was troubled that this was primarily because there was no protest group that he could work with.

Has the doctor kept their knowledge and skills up to date?

35. The Tribunal noted that there was no evidence of Dr Hart maintaining his skills and knowledge, having not been in practice since November 2024. Dr Hart had said he read about medicine for his own interest but that he was not prepared to submit evidence on this while he perceived there to be an impasse between him and the Tribunal.

Has the risk to public protection that previously required restrictive action in response changed and if so, how?

36. The Tribunal considered that the risk to public protection remained medium. Dr Hart had provided no evidence of any remediation or insight, nor of how he had kept his skills and knowledge up to date. The Tribunal considered that Dr Hart had not provided any of materials that the 2025 Tribunal indicated would assist this Tribunal.

37. The Tribunal was not satisfied that Dr Hart would not repeat his actions in the future if he thought they may be impactful or if a protest group were to become accessible to him.
38. The Tribunal acknowledged the sincerity of Dr Hart's beliefs and accepted that he may be judged differently by future generations but that a doctor could not pick and choose which laws to uphold.
39. The Tribunal determined that Dr Hart's fitness to practise remained impaired by reason of both his misconduct and his conviction. Despite his conviction now being spent, the Tribunal considered that Dr Hart had shown no insight into his conviction or misconduct. He had not remediated and had not kept his skills and knowledge up to date.

Determination on Sanction - 28/08/2026

1. Having determined that Dr Hart's fitness to practise is impaired by reason of misconduct and conviction, the Tribunal now has to decide in accordance with Rule 22(1)(h) of the Rules what action, if any, it should take with regard to Dr Hart's registration.

The Evidence

2. The Tribunal has taken into account the background to the case and the evidence received during the earlier stage of the hearing to reach a decision on what action, if any, it should take with regard to Dr Hart's registration.

Submissions

3. On behalf of the GMC, Mr Flook submitted that the issue of sanction was one for the Tribunal's own judgement. He reminded the Tribunal of its finding at the impairment stage that the level of risk was medium. Mr Flook submitted that the Tribunal should impose the least restrictive sanction necessary to uphold public protection.
4. Mr Flook submitted that Dr Hart had provided no evidence of insight or remediation so it was not appropriate or proportionate to revoke the current order or to allow it to expire.
5. Mr Flook submitted that an order of conditions would not be proportionate in this case and that the order of suspension should be extended to allow Dr Hart further time to develop his insight, to remediate and to provide evidence of his CPD and maintenance of clinical skills.

6. Dr Hart submitted that the two primary issues were that of insight and his clinical skills. He said that the impasse about his insight came about because of a difference of opinion between himself and other aspects of society and law and that he is unable to demonstrate insight as required by the Tribunal. In relation to his CPD and clinical skills, Dr Hart said that it was not open to him to complete relevant CPD whilst under suspension.
7. Turning to the appropriate sanction, Dr Hart said that he cannot worry about sanctions on his registration when he worries so much more about societal and ecological collapse. Dr Hart said that, were his registration to be suspended again, then he would return at the next review having seen a new wave of preventable deaths due to the climate crisis.

The Tribunal's Determination

8. At the impairment stage, the Tribunal determined that two of the three aspects of public protection were engaged, namely promoting and maintaining public confidence in the profession and upholding professional standards. It is for the Tribunal now to consider what regulatory action, if any, is needed to protect the public.
9. The Tribunal accepted legal advice and the procedure to be adopted under the Guidance (*MPT Hearings > Part C: stage three – sanction > Step 3: decide on sanction*). It bore in mind that the purpose of a sanction is not to be punitive, but to protect patients and the wider public interest, although it may have a punitive effect.
10. The Tribunal reminded itself that the sanctions bandings are intended to provide a guide, and that there may be evidence relevant to the individual circumstances of the case that indicates a sanction which is more or less restrictive than that suggested in the bandings. The suggested sanction banding for this case was a period of suspension between 6 and 12 months.
11. The Tribunal considered each of the available sanctions in turn, starting with the least restrictive.

No action

12. The Tribunal determined that, as there were no exceptional circumstances and as it had found there to be an ongoing risk to public protection, it would not be appropriate to take no action in this case.

Conditions

13. The Tribunal determined that an order of conditions would not be appropriate in this case. Conditions are most appropriate in cases of health or clinical concerns and where a doctor has insight. As Dr Hart had provided no evidence of insight or remediation, the Tribunal considered that an order of conditions would not be appropriate. It also considered that an order of conditions would not be proportionate to the risk posed to public protection by Dr Hart's misconduct and conviction.

Suspension

14. The Tribunal then went on to consider an order of suspension.
15. The Tribunal considered that an order of suspension would sufficiently address the need to protect public confidence in the profession and to maintain proper professional standards. It therefore is the appropriate sanction in this case.
16. The Tribunal noted that Dr Hart had indicated his main reason for attending this hearing or a subsequent review was to use the public forum to express his views on the climate crisis. The Tribunal considered that this reflected its earlier finding that Dr Hart had demonstrated contempt in some circumstances for both the law and this Tribunal. Despite this, the Tribunal considered that erasure would be disproportionate to Dr Hart at his first review hearing.
17. The Tribunal bore in mind that it should impose the least restrictive sanction necessary to protect the public. As such, the Tribunal determined to extend the current order of suspension.
18. The Tribunal determined that, given the status of the case is unchanged from the 2025 Tribunal, it would be appropriate to suspend Dr Hart's registration for a further period of 10 months. The Tribunal considered that this would allow Dr Hart time to reflect, remediate and develop his insight. The Tribunal considered that at this time, erasure is not necessary, where a lesser sanction could protect the public, and where the misconduct and conviction are not incompatible with continued registration, as they are capable of being remedied.
19. The Tribunal decided to direct a review of Dr Hart's case. A review hearing will convene shortly before the end of the period of suspension. The Tribunal wishes to clarify that, at the review hearing, the onus will be on Dr Hart to demonstrate how he has remediated, developed insight and updated his clinical skills and knowledge. The reviewing Tribunal

will have the full range of sanctions open to it, including erasure. It therefore may assist the reviewing Tribunal if Dr Hart provided:

- Evidence of his developed insight and remediation, particularly regarding how he can continue to engage in climate activism in a lawful and responsible manner, consistent with GMP, whilst maintaining public confidence in the profession.
- Evidence of continued professional development and maintenance of clinical skills.

20. Dr Hart will also be able to provide any other information that he considers will assist.

21. The Tribunal has directed to suspend Dr Hart's registration for 10 months. The MPTS will send Dr Hart a letter informing Dr Hart of his right of appeal and when the direction and the new sanction will come into effect. The current suspension will remain in place during the appeal period.