

ON PAPERS

Registration Appeals Committee (CPD Appeal)

24 October 2025

Name: SINHA, Richa
Registration number: 83114
Case number: CAS-211917-F9Q9W0

General Dental Council: Represented by Ela Rexhaj, IHLPS

Registrant: Unrepresented

Outcome: Appeal dismissed

Committee members: Debbie Jones (Dental Care Professional) (Chair)
Emma Grant (Dentist)
Carey Bamber (Lay)

Legal adviser: Helen Gower

Committee Secretary: Andrew Keeling

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

1. This was an appeal meeting before the Registration Appeals Committee (RAC). The meeting was conducted remotely on Microsoft Teams.
2. The appeal was against the decision of the Registrar of the General Dental Council (GDC) to erase Mrs Sinha from the Register for apparent non-compliance with the statutory Continuing Professional Development (CPD) requirements. The meeting was held in accordance with the terms of the General Dental Council (Registration

Appeals) Rules Order of Council 2006 ('the Registration Appeal Rules'), pursuant to Schedule 4A of the Dentists Act 1984 (as amended) ('the Act').

3. Neither party was present at today's meeting. The Committee first considered the issues of service and whether to proceed with the meeting on the papers in the absence of Mrs Sinha and any representatives for either party. The Committee accepted the advice of the Legal Adviser on both of these matters.

Decision to conduct the appeal in the absence of Mrs Sinha and on the papers

4. Notification of this appeal was sent to Mrs Sinha by Recorded Delivery and secure email on 26 September 2025 in accordance with Rule 5 of the Registration Appeal Rules.
5. The Committee noted that conducting the appeal on the papers is the default position of the GDC unless an appellant requests an oral hearing. It took into account that the GDC's acknowledgement of Mrs Sinha's appeal, dated 9 July 2025, informed Mrs Sinha that she could request an oral hearing within 28 days of the date of the letter. Having considered the documents provided, the Committee was satisfied that Mrs Sinha had made no such request.
6. The Committee noted that the bundle of documents and case summary that the Committee would be considering were sent to Mrs Sinha by Recorded Delivery and secure email on 26 September 2025.
7. In the circumstances, the Committee was satisfied that it was appropriate to consider today's appeal in the absence of either party and on the papers.

Preliminary matter

Application for the hearing to be held partly in private

8. The Committee noted the Council's application, made in its written submissions, for today's meeting to be part-held in private in order to protect Mrs Sinha's private and family life, in particular matters in relation to her health. Having accepted the advice of the Legal Adviser, the Committee decided to accede to the application for the reasons put forward by the Council. The meeting was therefore part-held in private and a private and public determination will be produced.

Summary of the Legal Framework

9. Section 34A of the Act sets out the requirements for dentists' training and development as follows:

‘(1) Rules shall require registered dentists to undertake such professional training and development as may be specified in the rules.

(2) If it appears to the registrar that a person has failed to comply with the requirements of rules made under subsection (1), the registrar may erase the person’s name from the register.

...

(4) Rules shall specify the procedures to be followed before the registrar –

(a) may erase a person’s name from the register under subsection (2);’

10. The General Dental Council (Continuing Professional Development) (Dentists and Dental Care Professionals) Rules 2017 (‘the CPD Rules’) set out the CPD requirements placed on Dentist registrants and the steps that the GDC shall take in respect of registrants’ compliance and non-compliance with those requirements.
11. The current CPD Rules came into force on 1 January 2018 and took effect in respect of dentists on the same date.
12. In accordance with Rule 1, a ‘CPD cycle’ means, in respect of a dentist, a period of five years beginning on 1 January following the date the dentist is first registered and each subsequent period of five years. A ‘CPD year’ means, in respect of a dentist, a period of 12 months beginning on 1 January in any calendar year.
13. Rule 2(1) of the CPD Rules sets out that dentists must complete a minimum of 100 hours of CPD within each CPD cycle.
14. Rule 2 states that “*CPD undertaken in each CPD cycle must include activities relevant to each field of practice in which the practitioner practised during that cycle.*”
15. Rule 2 also states that in completing the minimum number of hours, a practitioner who is not a temporary registrant must undertake at least 10 hours of CPD during each period of two consecutive CPD years (including any such two-year period which spans over more than one CPD cycle).
16. Rule 2 further states that any CPD undertaken by the practitioner is only to count towards the minimum number of hours, if –
 - a. there is documentary evidence from the provider of the CPD which states –
 - i. the subjects, learning content, aims, objectives and anticipated learning outcomes of the CPD and the date that the CPD was undertaken,
 - ii. the total number of hours of CPD undertaken,
 - iii. the name of the practitioner who has participated in the CPD activity,

- iv. that the CPD is subject to quality assurance and the name of the person or body providing the quality assurance is provided;
 - b. that documentary evidence includes confirmation from the provider that the information contained in it is full and accurate; and
 - c. the CPD delivered a learning outcome identified in the practitioner's CPD record in accordance with Rule 3(2)(a).
17. Rule 3 provides the requirement that all registrants must maintain a written record of all CPD that the practitioner plans to undertake and has undertaken during the CPD cycle. Rule 3 also sets out what the written record must include.
18. Rule 4 of the CPD Rules states that for each CPD year, a practitioner must submit to the Registrar a statement which confirms the number of hours of CPD undertaken during that corresponding year or, if the practitioner has not undertaken any CPD in that CPD year, confirmation that no CPD has been undertaken. The practitioner must also confirm in this statement that they have kept a CPD record, that the CPD undertaken (where applicable) was relevant to the practitioner's field of practice and declare the information in their statement is full and accurate. This statement must be completed within 28 days of the end of that CPD year.
19. Rules 6 and 7 prescribe various notification requirements under which the Registrar may require a practitioner to, among other things, submit their CPD record and/or provide evidence of their compliance with the CPD requirement.
20. Rule 8 provides that the Registrar "*may erase the practitioner's name*" in circumstances where the practitioner has either failed to comply with a notice sent under Rule 6 or 7, or where the Registrar is not satisfied from the response provided by the practitioner that they have met the CPD requirement and/or other related obligations under the relevant Rules.
21. In accordance with Rule 9, it is open to the practitioner who has not complied with the CPD requirement as set out in Rule 2 in respect of a CPD cycle, to apply in writing to the Registrar for a further period in which to complete the outstanding CPD in respect of that cycle (a "period of grace"). They must do so before the end of the CPD cycle but no sooner than six months before the end of the cycle.

Summary of the factual background

22. Mrs Sinha first registered with the GDC as a dentist on 10 June 2004. Therefore, in accordance with Rule 1 as set out above, Mrs Sinha's current CPD cycle began on 1 January 2020 and ended on 31 December 2024.
23. Between 22 October 2024 and 12 December 2024, an Annual Renewal Notice letter and four email reminders were sent to Mrs Sinha requesting her to submit her CPD

statement by 28 January 2025 detailing how many CPD hours she had completed during the cycle (1 January 2020 to 31 December 2024). Mrs Sinha was also reminded of the option to apply for a grace period if she needed further time to complete her CPD, and that the deadline to apply for a grace period was 31 December 2024.

24. On 30 December 2024, Mrs Sinha applied for a period of grace through eGDC. The notes on the activity log state that Mrs Sinha was *“going through personal issues”*.
25. On 8 January 2025, the GDC wrote to Mrs Sinha to inform her that the request for a period of grace had been accepted noting that it will run from 1 January 2025 to 26 February 2025. The letter detailed that Mrs Sinha must submit her CPD statement which demonstrates that since 1 January 2020 she had completed 100 verifiable hours of CPD. In addition, the letter details that Mrs Sinha must submit her statement by 26 March 2025.
26. On 13 February 2025, the GDC sent an email reminder to Mrs Sinha’s registered email address. This reminder notified Mrs Sinha that her deadline for her CPD grace period was approaching and that all CPD for 2020-2024 should be completed by 26 February 2025. The email reminded Mrs Sinha that her statement should be submitted by 26 March 2025. It further detailed that she must submit a CPD statement which demonstrates that since 1 January 2020 she had completed 100 verifiable hours of CPD. She was notified that if she failed to submit a compliant CPD statement by this date, her registration may be put at risk.
27. On 24 March 2025, the GDC made a courtesy call to Mrs Sinha to remind her of the upcoming deadline to submit her CPD statement. The notes detail that Mrs Sinha did not answer this call, as such a voicemail was left.
28. On 24 March 2025, further to the above phone call, the Council wrote to Mrs Sinha via email to remind her that the deadline to submit her 2020-2024 CPD end of cycle statement was approaching. The email details that only CPD completed between 1 January 2020 – 26 February 2025 should be included in her CPD statement. The email reiterated that Mrs Sinha must submit a compliant CPD statement which demonstrates 100 verifiable hours of CPD, and that this must be submitted by 26 March 2025.
29. On 27 March 2025, Mrs Sinha wrote to the Council via email and detailed she was only able to complete 7.5 hours of the remaining 48 hours left on her CPD cycle. She informed the Council that she had booked an implant course with 38 hours CPD and subsequently requested a further six weeks to finish the remaining verifiable CPD.
30. On 27 March 2025, in a separate email, Mrs Sinha wrote to the Council, forwarding proof of *“CPD undertaken after declaration”*.

31. On 28 March 2025, the GDC responded to Mrs Sinha's email and informed her that the deadline to complete outstanding CPD was 26 February 2025 and that the period of grace cannot be extended. The Council further detailed that she should await further communication from the Council and that she will be given the opportunity to provide reasons why she was unable to complete her CPD requirements.
32. On 4 April 2025, the Council sent a notice under Rule 6 to Mrs Sinha by recorded delivery to her registered address. The notice detailed that although she had submitted a CPD statement to the Council, the statement was non-compliant as she did not declare enough hours to meet the requirement for her cycle as set out in the Enhanced CPD (2018) scheme. The notice acknowledged that Mrs Sinha was entered into a period of grace and that period had ended. The notice explained that Mrs Sinha's statement was non-compliant because between 1 January 2020 and 31 December 2024 and within the period of grace between 1 January 2025 and 26 February 2025, she needed to complete a minimum of 100 verifiable hours of CPD. The notice also detailed that she was given the deadline of 26 March 2025 to declare her CPD hours and subsequently, did not declare enough hours to meet the requirement by this deadline.
33. In addition, the notice stated that if Mrs Sinha wished to retain her registration, she should submit her CPD record to the Registrar by 2 May 2025 in order to demonstrate that she had met the requirement. She was informed that if the Council did not receive a response to the notice or if her response was unsatisfactory, she may be erased from the register.
34. Further, the Rule 6 notice afforded Mrs Sinha with an opportunity to inform the Council of exceptional circumstances, together with supporting evidence, which meant that she was unable to submit a compliant statement. She was informed that these reasons will be taken into consideration in deciding whether any further enforcement action should be taken. On 7 April 2025, a copy of the notice was also sent via email to her registered email address.
35. On 28 April 2025, the Council made a call to Mrs Sinha to understand if she would be responding to the Rule 6 notice. The notes detail that Mrs Sinha did not answer this call, as such a voicemail requesting a call back was left and a follow-up email was sent to reiterate the instructions in the Rule 6 notice.
36. On 2 May 2025, the Council received correspondence via email from Mrs Sinha in response to the Rule 6 notice. She attached her Personal Development Portfolio along with CPD certificates that covered the period 2020 to May 2025 demonstrating 105 hours of CPD.

37. Mrs Sinha, in her email, detailed:

- a. She has always placed great value on CPD and personal improvement. She detailed that over the years she has consistently undertaken more CPD than required.
- b. This cycle of CPD was unusually challenging for her. She detailed that the post-COVID period brought significant strain with increased staff turnover and a heavier workload for her. As a result of this, [PRIVATE], and she had to reduce her working days. During this time, she detailed she became involved in social and community work which helped her *“gradually regain capacity to increase her working hours”*.
- c. In the midst of personal and professional challenges she overlooked the CPD shortfall. She detailed that she realised how few hours had been recorded when she started filling in her annual CPD statement.
- d. She was under the impression that she had another year remaining in this cycle. She detailed that was also unaware that she could complete CPD through online courses. She stated that as soon as she received communication from the GDC, she acted immediately and completed the remaining hours.
- e. She requested that the Council take the context provided in her email into consideration and accept the recently completed CPD retrospectively.
- f. She detailed that for 2025-2030, she has already committed to several in-person courses. She is willing to provide further details of these planned activities if required.

38. On 6 May 2025, the Council wrote to Mrs Sinha to confirm that her CPD record for assessment had been received. Mrs Sinha acknowledged receipt on the same day, indicating she eagerly awaited a response. She invited the Council to contact her should they need further information.

39. On 12 May 2025, the Council sent a notice under Rule 8 to Mrs Sinha’s registered address by recorded delivery. This notice confirmed that Mrs Sinha had failed to provide a compliant CPD record demonstrating that she had met the minimum requirement for the period 1 January 2020 – 31 December 2024 and for the grace period 1 January 2025 – 26 February 2025. The notice detailed that Mrs Sinha’s CPD remains deficient because:

- a. She was outstanding 83 verifiable CPD hours.

- b. She did not provide an Activity Log.
- c. 40 x certificates are dated after 26 February 2025 and are outside the cycle dates requested.
- d. 4 x certificates are duplicates of certificates previously assessed and accepted.
- e. 5 x certificates are duplicates of certificates previously assessed and rejected.
- f. ... - 09/11/2022 email confirmation did not include documentary evidence which satisfies the CPD criteria, such as aims, objectives, GDC outcomes and hours taken to complete.
- g. Basic Life Support certificate dated 13 September 2024 did not contain aims, objectives, GDC outcomes, or hours taken to complete.

40. The notice details that the Council considered the Guidance on the Registrar's Decision to erase for CPD Non-compliance (the Guidance). Along with the Guidance, the Council took into account the following evidence from Mrs Sinha:

- a. The period of grace request Mrs Sinha made through eGDC on 30 December 2024,
- b. The email from Mrs Sinha dated 27 March 2025 with attachments, and
- c. The email dated 2 May 2025 with attachments.

In applying the Guidance to their decision making, the Council identified the following factors:

- a. The Council had not been provided with any supporting or medical evidence regarding [PRIVATE].
- b. Notwithstanding Mrs Sinha's circumstances, she was able to continue working as a dental professional. The Council referred to the fact that within the email received 2 May 2025, Mrs Sinha stated that she reduced her working days, but after becoming involved in social and community work, she was gradually able to regain capacity to increase her working hours.

- c. The shortfall of CPD was significant, as only 17 verifiable CPD hours were completed.
- d. The CPD completed before or since the relevant period(s) is not relevant.

As a result, the Registrar had made the decision to remove Mrs Sinha's name from the register for non-compliance with the Rules. Mrs Sinha was notified that unless an appeal was submitted, the Registrar's decision would take effect on 11 June 2025. On 13 May 2025, a copy of the notice was sent via email to Mrs Sinha's registered email address.

Notice of Appeal

- 41. On 9 June 2025, the Council received a Notice of Appeal (NOA) via email from Mrs Sinha which confirmed that she wished to appeal against the decision to remove her from the register.
- 42. Mrs Sinha's NOA set out the following grounds of appeal, noting that she wished to offer some *"honest context behind the circumstances that led to [her] current situation"*:
 - a. Difficulties experienced as a principal dentist: Mrs Sinha detailed that she is a principal dentist running two busy practices. She stated that after the COVID-19 she encountered severe staffing shortages, increasingly complex patient demands and constantly evolving guidelines. She outlined that the difficulties she experienced as a principal dentist led to [PRIVATE].
 - b. Involvement in community initiatives: Mrs Sinha further detailed that she became involved in community outreach including dental home visits and voluntary services for vulnerable patients. This work, she detailed, helped her [PRIVATE] and allowed her to reconnect with core values that led her to dentistry. During this period, she explained how she was nominated for a community service award by the Cabinet Office which uplifted her.
 - c. [PRIVATE]
 - d. Misunderstanding of CPD requirements: Mrs Sinha detailed that she experienced [PRIVATE] and that a consequence of this was that she did not understand the CPD cycle requirements. Mrs Sinha believed she had until 2025 to complete the required hours. [PRIVATE]
 - e. CPD Compliance outside relevant period: Mrs Sinha stated that she applied for an extension to attend a face-to-face course but learned that this would not be possible. She detailed that with the support of her family, friends [PRIVATE] she worked to complete the remaining 83 hours of CPD, including an additional five

hours that were not included in her previous submission. She further detailed that she is liaising with a course provider for a BLS course completed in September 2024 to acquire the certificate in the correct format. Once in the correct format, Mrs Sinha suggested that it will provide five hours of CPD.

- f. Impact of removal from the register: Mrs Sinha detailed that removal from the register will impact her ability to deliver home visits to elderly and vulnerable patients.... She stated that she is the only dentist within her practice that provides this service. She further detailed that removal from the register will have significant consequences for the livelihoods of her staff that she employs across both her practices as her registration sustains the business operations that supports their employment.

g. [PRIVATE]

- h. Accountability for her oversight: Mrs Sinha detailed that she takes full responsibility for the oversight in her CPD requirements. She reiterated that [PRIVATE] as well as building more robust support structures in her professional life.
- i. Commitment to learning from the experience: Mrs Sinha detailed that she is committed to learning from this experience and continuing to serve her community with compassion, professionalism, and dedication that has defined her career until now. Mrs Sinha requested that she be given “another chance”.

43. [PRIVATE]

44. On 10 June 2025, Mrs Sinha’s CPD evidence was assessed by a GDC Operations Officer. Mrs Sinha was deemed to be non-compliant with her CPD requirements on the basis that she had 79 verifiable CPD hours outstanding for the cycle 1 January 2020 to 31 December 2024 and within the period of grace between 1 January 2025 and 26 February 2025. It was noted that the CPD certificates provided by Mrs Sinha in support of her appeal were for courses completed outside of the relevant period, were duplicates of certificates submitted previously and did not contain learning aims, outcomes or objectives. Therefore, they could not be counted for the purpose of the assessment. It was confirmed that, as of 10 June 2025, Mrs Sinha had completed 21 hours of verifiable CPD hours for the cycle 1 January 2020 to 31 December 2024 and within the period of grace 1 January 2025 to 26 February 2025.

Submissions

45. In the GDC’s written submissions, the Registrar’s position was set out as follows:

‘It is the Registrar’s position that the Appellant is non-compliant with the requirement that dentists must complete the minimum of 100 hours of CPD for each

CPD cycle. This is because between 1 January 2020 and 31 December 2024 and within the period of grace 1 January 2025 – 26 February 2025, the Appellant did not complete a minimum of 100 verifiable hours of CPD, in accordance with Rule 2.

As set out above, there is no power to waive these provisions.

The Appellant, in her NOA, detailed that she believed she had until 2025 to complete her CPD requirements. It is submitted by the Registrar that the Appellant was reminded on numerous occasions of the need to complete a minimum of 100 verifiable hours of CPD between 1 January 2020 and 31 December 2024 and within the period of grace 1 January 2025 – 26 February 2025, as set out in detail above. It is the Appellant's responsibility to ensure that she understands and complies with the requirements for continued registration, which includes compliance with the CPD requirements annually and during each five-year CPD cycle.

[PRIVATE]

It is noted that the Appellant completed additional CPD after the stipulated deadline, to demonstrate her willingness to her professional development. The Registrar submits that, any CPD completed outside of the relevant period (1 January 2020 to 31 December 2024 and within the period of grace 1 January 2025 – 26 February 2025) cannot be considered for the purpose of exercising the discretion to erase.

Further the Appellant detailed that erasure would impact her involvement in community initiatives as well as adversely impacting her business and professional life. The Registrar submits that, in line with the Guidance, this factor also cannot be considered for the purpose of exercising discretion to erase.

The Registrar notes that since the Rule 8 notice, the Appellant has provided some additional context and evidence (as set out above). Based on the new evidence, it remains a matter for the Committee as to whether exceptional circumstances exist in line with the Guidance.

As of 10 June 2025, the Appellant had completed 21 hours of verifiable CPD hours for the cycle 1 January 2020 to 31 December 2024 and within the period of grace 1 January 2025 to 26 February 2025 which clearly breaches the requirement that dentists for each CPD cycle, must complete the minimum of 100 hours of CPD.

It is open to the Appellant to apply to restore her registration at any time following this appeal.'

Committee's Decision and Reasons on the Appeal

46. The Committee had regard to the documentary evidence provided today and took account of the written representations made by the GDC and Mrs Sinha's Notice of Appeal. It accepted the advice of the Legal Adviser. The Committee also took note of the GDC's *Guidance on the Registrar's Discretion to Erase for CPD Non-Compliance* (February 2024) (the GDC's Guidance).
47. The first consideration for the Committee was whether Mrs Sinha had complied with her obligations under the CPD Rules by demonstrating completion of at least 100 hours of verifiable CPD within the period 1 August 2020 to 31 December 2025, and including the period of grace between 1 January 2025 and 26 February 2025.
48. Having carefully reviewed the CPD records which Mrs Sinha submitted, the Committee determined that she demonstrates having completed 21 verifiable hours of CPD within the period of 1 August 2020 to 31 December 2025, and 1 January 2025 to 26 February 2025. This was consistent with the Registrar's assessment that Mrs Sinha was 79 hours short in the relevant period. Therefore, the Committee determined that Mrs Sinha is not compliant with her statutory obligations under the CPD Rules.
49. The Committee was satisfied that the required notices had been duly served on Mrs Sinha in accordance with the Rules and that the correct procedure leading to the Registrar's erasure decision had been followed. The remaining consideration for the Committee was therefore whether the Registrar's decision to erase should be allowed to stand.
50. The Committee recognised that the CPD requirement is a mandatory statutory requirement which applies to all registered dental professionals. Compliance is important in helping to ensure patient safety and in maintaining wider public confidence in the profession so as to meet the overarching objective of the GDC under Section 1 of the Act. The Committee noted the personal circumstances Mrs Sinha outlined in her appeal, [PRIVATE]. The Committee also noted that Mrs Sinha had been registered since 2004 and therefore would have been fully aware of the CPD requirements and that she was a significant amount of hours short in meeting those requirements.
51. Therefore, having regard to all the circumstances, the Committee determined that there were no grounds on which this appeal should be allowed. Mrs Sinha had failed to demonstrate that she was compliant with her obligations under the CPD Rules. The decision of the Registrar to erase her name was reached correctly in accordance with the procedural requirements of the Rules and following repeated reminders to Mrs Sinha of her obligations under the CPD Rules and the importance of compliance in order to maintain continued registration.
52. This appeal was accordingly dismissed.
53. Unless Mrs Sinha exercises her right of appeal to the court, the erasure decision will take effect upon the expiry of the 28-day appeal period. It will then be open to Mrs

Sinha to apply for the restoration of her registration if she meets the CPD and other requirements for restoration.

54. This will be confirmed to Mrs Sinha in writing.

55. That concludes this determination.