

ON PAPERS
Registrations Appeal Hearing
CPD Appeal Hearing
On the papers

7 August 2025

Name: HAMEED, Merriem

Registration number: 270696

Case number: CAS-211189-B7Z2N2

General Dental Council: Instructed by Sushuma Chandrasekhar, ILAS

Registrant: Not present. Represented by Clyde & Co Solicitors

Outcome: Appeal dismissed

Committee members: Jacky Hart (Chair, Dental Care Professional Member)
Dr Jasdeep Badyal (Dentist Member)
Audrey McFarlane (Lay Member)

Legal adviser: Melissa Coutino

Committee Secretary: Jenny Hazell

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 an appeal meeting before the Registration Appeals Committee (RAC). The appeal is against the decision of the Registrar of the General Dental Council (GDC) to erase Ms Hameed from the Dentists Register for apparent non-compliance with the statutory Continuing Professional Development (CPD) requirements. The hearing is being 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 2A of the *Dentists Act 1984* (as amended) ('the Act').

2. The hearing was conducted remotely via Microsoft Teams in line with current GDC practice. Neither party was present at today's hearing, following notification from the GDC that the appeal was to be conducted on the papers.

Preliminary matters

Decision to conduct the appeal in the absence of Ms Hameed and on the papers

3. Neither party was present at today's meeting. The Committee noted that conducting the appeal on the papers is the default position of the GDC unless an appellant requests an oral hearing. Having considered the documents provided, the Committee was satisfied that Ms Hameed had made no such request.

4. Notification of this appeal was sent to Ms Hameed's registered address by Recorded Delivery and secure email on 1 July 2025 in accordance with Rule 5 of the Registration Appeal Rules. The Notification of this appeal indicated that a Committee would be considering the appeal between 4 – 8 August 2025. A further letter, dated 14 July 2025, was sent to Ms Hameed's registered address by Recorded Delivery and by email enclosing a copy of the bundle of documents and case summary.

5. The Committee was satisfied that it was appropriate to consider today's appeal in the absence of both parties and on the papers.

Application by the GDC for the hearing to be held in private

6. The GDC submitted that part of this appeal hearing should be conducted in private, in accordance with Rule 14(1) as there are matters relied upon by Ms Hameed which relate to her private and family life which should be protected.

7. The Committee accepted the advice of the Legal Adviser in respect of the provisions of Rule 14(1). It was satisfied that it was necessary for the protection of the family life of Ms Hameed that the public should be excluded from part of the hearing. It will produce a suitably redacted version of this determination, excluding those parts of its decision which relate to Ms Hameed's private and family life.

Decision and reasons on the appeal

Background

8. The General Dental Council (Continuing Professional Development) (Dentists and Dental Care Professionals) Rules 2017 ('the CPD Rules') set out the CPD requirements placed on dentists as of 1 January 2018, and the steps that the GDC shall take in respect of registrants' compliance and non-compliance with those requirements.

9. The CPD Rules came into force on the 1 January 2018 and took effect in respect of Dentists on the same date.

10. 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. In accordance with Rule 2, a dentist is required to complete 100 hours of CPD per cycle.

11. Ms Hameed appealed against the Registrar's decision that her CPD is non-compliant because she failed to provide a compliant CPD record demonstrating that she had met the minimum requirement for the period 1 January 2023 – 31 December 2024. The Registrar considered that Ms Hameed's evidence demonstrated that she had completed 0 hours of verifiable CPD between 1 January 2023 – 31 December 2023 and 5 hours of verifiable CPD between 1 January 2024 – 31 December 2024.

Summary

12. The GDC's case in support of its decision was summarised as follows:

13. Ms Hameed first registered with the GDC as a dentist on 19 June 2017. Her current CPD cycle began on 1 January 2023 and will end on 31 December 2027.

14. On 22 October 2024, the GDC sent an email reminder to Ms Hameed's registered email address. This reminder notified Ms Hameed that her 2024 CPD year was coming to an end and reminded her that she was required to submit her CPD statement, detailing how many CPD hours she had completed during that year, by 28 January 2025. The letter reminded her to make sure that she had completed at least 10 CPD hours over the last two years. Ms Hameed was advised that if she did not submit a compliant statement before the deadline, her registration may be put at risk.

15. On 11 November 2024, the GDC sent Ms Hameed an Annual Renewal Notice by post to her registered address. The Annual Renewal Notice is designed to remind registrants that their registration with the GDC is due for renewal and of the need to pay their annual retention fee, make their indemnity declaration and submit their CPD statement. Ms Hameed was also reminded in the Annual Renewal Notice that she was required to submit her CPD statement by 28 January 2025.

16. On 26 November 2024, the GDC sent an email reminder to Ms Hameed's registered email address, requesting that she submit her CPD statement by 28 January 2025 and stating that she was required to complete a minimum of 10 hours of CPD during each period of two consecutive years.

17. On 5 December 2024, the GDC sent an email to Ms Hameed in which she was reminded that her Annual Renewal for 2024 was due on or before 31 December 2024. Ms Hameed was

reminded within this email of the need to complete her CPD statement and of the requirement to complete at least 10 verifiable CPD hours during any two consecutive years.

18. On 12 December 2024 and 8 January 2025, the GDC sent further email reminders to Ms Hameed's registered email address. These reminders notified Ms Hameed that her CPD year was coming to an end and stated that she was required to submit her CPD statement by 28 January 2025. The requirement to complete at least 10 hours of CPD during each period of two consecutive years was reiterated. Ms Hameed was notified that if she failed to submit a compliant CPD statement by this date, her registration may be put at risk.

19. Ms Hameed made her CPD statement on 23 December 2024. Between 20 and 28 January 2025, the GDC sent three SMS reminders regarding the CPD statement to Ms Hameed's registered mobile number.

20. On 28 January 2025, Ms Hameed telephoned the GDC and was advised that she had not met the requirement to complete at least 10 hours of CPD over two consecutive years.

Rule 6 Notice

21. On 24 February 2025, the GDC sent a Notice under Rule 6 to Ms Hameed by recorded delivery to her registered address. The Notice was also sent via email to Ms Hameed's registered email address. The notice stated that, although Ms Hameed had submitted a CPD statement to the GDC, she had not declared enough hours to meet the requirement to complete a minimum of 10 hours of CPD over two consecutive years. It was noted that she had submitted an annual CPD statement of zero verifiable hour for the 2023 CPD year and an annual CPD statement of 5 verifiable hours for the 2024 CPD year. The notice stated that if Ms Hameed wished to retain her registration, she should submit her CPD record to the Registrar by 24 March 2025 to demonstrate that she had met the requirement.

Response to the Rule 6 Notice

22. Ms Hameed wrote to the GDC in a letter dated 17 March 2025 regarding her CPD and enclosed CPD evidence. In that letter, Ms Hameed:

- expressed regret that she had not complied with her CPD requirements for the period 1 January 2023 – 31 December 2024;
- stated that she enrolled in the Baird implant course due to start in January 2023 which required attendance for 3 days a month in Leeds until November 2023 but had to pull out of the course [PRIVATE];
- [PRIVATE];
- [PRIVATE];
- [PRIVATE];
- [PRIVATE];
- [PRIVATE];
- [PRIVATE];
- noted that she was now more able to focus on learning and is in a position to "make up" the missed hours and outlines CPD she intended to take.

Rule 8 Notice

23. On 4 April 2025, the GDC sent a Rule 8 Notice to Ms Hameed's registered address by recorded delivery. This notice confirmed that Ms Hameed had failed to provide a compliant CPD record demonstrating that she had met the minimum requirement for the period 1 January 2023 to 31 December 2024 and that as a result, the Registrar had made the decision to remove her name from the Dentists register for non-compliance with the Rules. It was noted that she had declared 0 hours of verifiable CPD in 2023 and 5 hours of verifiable CPD in 2024 which was not enough to satisfy the requirement of 10 hours of verifiable CPD for every two consecutive CPD year period. Ms Hameed was notified that unless an appeal was submitted by 2 May 2025 the Registrar's decision would take effect on 7 May 2025.

24. The Rule 8 Notice also stated that the GDC had considered the evidence provided by Ms Hameed in her letter of 17 March 2025 and had applied the Guidance on the Registrar's Discretion to Erase for CPD Non-compliance. The GDC took into account the following factors:

- the events described by Ms Hameed were not exceptional personal circumstances beyond her control;
- the CPD she had completed since the timeframe under consideration was not relevant;
- if registered with the GDC, she had to continue to do CPD even if not currently working for any reason [PRIVATE]. If she wished to remain registered, she would need to continue to meet her CPD obligations during her leave period because CPD is a legal requirement of registration; and
- [PRIVATE].

25. The Notice was sent on 4 April 2025 by recorded delivery to Ms Hameed's registered address. On 7 April 2025, a copy of the notice was sent to Ms Hameed's registered email address.

Notice of Appeal

26. On 1 May 2025 Clyde and Co Solicitors, acting on behalf of Ms Hameed, submitted a Notice of Appeal (NOA) which set out the grounds of Ms Hameed's appeal. It also included a bundle of supporting documentation which included a reflective note by Ms Hameed, a copy of her CV, [PRIVATE] and CPD certificates.

27. The NOA referred to Ms Hameed's reflective note in which she apologised for failing to meet the CPD requirements. It also set out that she had undertaken significant further CPD and is committed to undertaking CPD in the future. In support of this, Ms Hameed relied on the following:

- Ms Hameed's PDP is for the years 2023-2025 which covers both the relevant CPD period of 1 January 2023 – 31 December 2024 and also the next CPD period which commences on 1 January 2025.
- Ms Hameed's CPD activity log which relates to CPD activity between 1 June 2024 to 26/27 July 2025. This log covers both the relevant CPD period of 1 January 2023 – 31 December 2024 and also the next CPD period which commences on 1 January 2025.
- Ms Hameed's invoice for an oral surgery masterclass dated 20 March 2025 and therefore outside the relevant CPD period of 1 January 2023 – 31 December 2024.
- Ms Hameed's CPD certificates which contained CPD undertaken during the relevant CPD period and also in the next CPD period commencing on 1 January 2025.

28. In the NOA, reference is made to Ms Hameed's personal circumstances, as stated previously in her letter dated 17 March 2025 as well as her reflective note. [PRIVATE]

29. The letter also set out information relating to Ms Hameed's health. [PRIVATE].

30. [PRIVATE].

31. [PRIVATE].

32. Finally, the NOA set out Ms Hameed's specific grounds of appeal. In the NOA Ms Hameed did not dispute she has not complied with her CPD requirements.

33. The Registrar's position is that Ms Hameed is non-compliant with the CPD requirements because she has failed to provide a CPD record demonstrating that she has completed the minimum requirement for the period 1 January 2023 to 31 December 2024, in accordance with Rule 2. It is submitted by the Registrar that Ms Hameed was reminded on numerous occasions of the need to complete her CPD hours and of the requirement to complete 10 verifiable CPD hours in each two-year period, as set out in detail above.

34. The Registrar submitted that Ms Hameed would have had sufficient opportunities to complete the required CPD and further, she ought to be aware of the requirements for continued registration, which includes ongoing compliance with the CPD requirements annually and during each two-year consecutive CPD cycle.

35. The Registrar acknowledges and is sympathetic to the personal circumstances experienced by Ms Hameed during the relevant period.

36. The Registrar acknowledges that Ms Hameed has provided further information about her circumstances since this was considered at Rule 8 stage. Accordingly, it will be a matter for the Committee to determine whether, in light of the additional evidence supported alongside the NOA, this alters the position such as the Committee may consider 'exceptional circumstances' exist in this case.

Committee's decision

37. The Committee had regard to the documentary evidence provided today and took account of the written submissions made on behalf of the GDC dated 27 May 2025. It has also had regard to the detailed submissions made on behalf of Ms Hameed as set out in the NOA. It accepted the advice of the Legal Adviser.

38. The Committee was in agreement with the Registrar (and it is not in dispute on appeal) that Ms Hameed was required to complete at least 10 hours of verifiable CPD during her two-year CPD cycle. She is short of 5 hours in a two-year period. [PRIVATE], it noted that Ms Hameed was able to complete CPD during the period June 2024 until December 2024. The Committee considered that Ms Hameed could have completed the remaining 5 hours CPD prior to the deadline of 31 December 2024.

39. The Committee was satisfied that Ms Hameed had not complied with her CPD requirements.

40. The Committee has taken full account of the challenging personal circumstances Ms Hameed's experienced. It noted the number of reminders that were sent by both email and text

to Ms Hameed. The Committee determined that it was her responsibility to be familiar with the CPD requirements. Having carefully considered Ms Hameed's personal circumstances, the Committee did not consider these to amount to exceptional circumstances that would have prevented her from completing her CPD requirements in the statutory time frame. As of today, Ms Hameed had only completed five hours of verifiable CPD in the requisite period.

41. The Committee was satisfied that the GDC has complied with the CPD Rules in dealing with Ms Hameed's CPD requirements, including the serving of the statutory notices on her.

42. The Committee also balanced the interests of Ms Hameed against the wider public interest and to the public expectation that registered dental professionals will meet their statutory CPD requirements in order to remain on the Register. The Committee was satisfied that the decision was proportionate, and this appeal therefore fails.

43. Accordingly, the appeal is dismissed. The Committee wished to remind Ms Hameed that it is open to her to apply for the restoration of her name to the Dentists Register upon completion of the required number of CPD hours.

44. This decision will be confirmed to Ms Hameed in writing.

45. That concludes this determination.

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