

ON PAPERS

Registrations Appeal Hearing CPD Appeal Hearing

22 April 2026

Name: Ibrahim, Abdillahi
Registration number: 308069
Case number: CAS-214012-Z4G8B4

General Dental Council: Instructed by Noranne Griffith , ILAS

Registrant: Unrepresented

Outcome: Appeal dismissed

Committee members: Harpreet Ark (Chair, Dentist member)
Clive Powell (Lay member)
Jodie Mahoney (DCP member)

Legal adviser: Jenny Appleton

Committee Secretary: Jamie Barge

1. This is an appeal hearing before the Registration Appeals Committee (RAC). The appeal is against the decision of the Registrar of the General Dental Council (GDC) to erase Mr Ibrahim from the 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 4A 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 matter

Decision to conduct the appeal in the absence of Mr Ibrahim 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 Mr Ibrahim had made no such request.
4. Notification of this appeal was sent to Mr Ibrahim by Recorded Delivery and secure email on 19 March 2026 in accordance with Rule 5 of the Registration Appeal Rules.
5. The Committee was satisfied that it was appropriate to consider today's appeal in the absence of the parties and on the papers.

Private Hearing

6. At the beginning of the hearing, the Committee considered whether, under Rule 14(1) of the Appeal Rules, this appeal should be held in part in private since the matters under consideration include matters relating to Mr Ibrahim's private and family life.
7. The Committee bore in mind that, as a starting point, hearings should be conducted in public session. However, having accepted the advice of the Legal Adviser, the Committee decided that to protect Mr Ibrahim's private and family life a private and public determination will be produced if required.

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 DCP registrants as of 1 August 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 dental care professionals on 1 August 2018.
10. In accordance with Rule 1, a 'CPD cycle' means, in respect of a dental care professional, a period of five years beginning on 1 August following the date the dental care professional is first

registered and each subsequent period of five years. A 'CPD year' means, in respect of a dental care professional, a period of 12 months beginning on 1 August in any calendar year.

11. Mr Ibrahim appealed against the Registrar's decision that despite his CPD being non-compliant because he failed to provide a compliant CPD record demonstrating that he had met the minimum requirement for the period of 1 August 2023 to 31 July 2025, and asked the Registrar to consider exceptional circumstances.

Summary

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

The Appellant first registered with the General Dental Council ("the Council") as a dental care professional, with the title of dental hygienist on 12 June 2023. In accordance with Rule 1 as set out above, the Appellant's current CPD cycle began on 1 August 2023 and will end on 31 July 2028.

On 22 May 2025, the Council sent an email reminder to the Appellant's registered email address. This reminder, notified the Appellant that his CPD year was coming to an end and reminded him that he was required to submit his CPD statement, detailing how many CPD hours he had completed during that year, by 28 August 2025. The Appellant was advised that if he did not submit a compliant statement before the deadline, his registration may be put at risk.

On 10 June 2025, the Council sent the Appellant an Annual Renewal Notice letter by post to his registered address.

On 12 June, 7 and 18 July 2025 and 18 August 2025, the Council sent SMS reminders to the Appellant's registered mobile number. These reminders, notified the Appellant that his 2024-2025 CPD Annual Statement is incomplete and directed him to sign onto eGDC and update his statement by 28 August 2025.

Between 12 August 2025 and 28 August 2025, the Council sent three SMS reminders regarding the submission of her CPD statement to Mr Ibrahim's registered mobile number

Rule 7 notice

On 25 September, the Council sent a notice under Rule 7 (the "Rule 7 notice") to the Appellant by recorded delivery stating that records showed he had not completed his CPD submission for the yearly cycle of 1 August 2024 – 31 July 2025 by the deadline of 28 August 2025. He was informed that he was required to send his CPD statement for the relevant period by 23 October 2025

Rule 8 notice

On 5 November 2025, the Council sent a notice under Rule 8 (the "Rule 8 notice") to the Appellant's registered address by recorded delivery.

The Rule 8 notice confirmed that the Appellant had failed to complete his annual CPD statement for the period 1 August 2024 – 31 July 2025 by the deadline of 23

October and that as a result, the Registrar was not satisfied he had complied with the Rules and had made the decision to remove his name from the dental care professionals register for non-compliance. The Appellant was notified that unless an appeal was submitted by 3 December 2025, the Registrar's decision would take effect on 5 December 2025.

Notice of Appeal

On 2 December 2025, the Council received a Notice of Appeal ("NOA") and supporting CPD evidence.

In the letter of representations, the Appellant stated that he realised he had not completed the required verifiable 10 hours of CPD over 1 August 2023 - 31 July 2025 – the evidence suggests he completed 6.25 hours – [IN PRIVATE]. The Appellant stated that he mentioned these circumstances by way of explanation, not excuse, and that he recognised the importance of CPD compliance. The Appellant apologised for his error in failing to submit his annual statement and for failing to complete the minimum 10 hours CPD in the relevant two-year period. The Appellant took full responsibility for both these failings. He described the financial difficulties that erasure from the GDC register would cause him and his family.

On 3 December 2025, the Appellant's CPD evidence was assessed by a Registration Operations Officer. The Appellant was deemed to be non-compliant with his CPD requirements on the basis that:

- a. he had continued to fail to submit an annual CPD statement for the 2024 – 2025 cycle year;
- b. four of the CPD certificates provided are out of the relevant cycle period (they are dated August 2025).

Submissions

13. In its written submissions, it is the Registrar's position that the Appellant is non-compliant with the CPD requirements because he has failed to provide an annual CPD statement as required by Rule 4. The CPD evidence provided is otherwise insufficient.
14. It is submitted by the Registrar that the Appellant was reminded on numerous occasions of the need to submit an annual statement and of the requirement to complete 10 verifiable CPD hours in each two-year period, as set out in detail above.
15. As of the time of writing, the Appellant's annual CPD statement is outstanding and there is insufficient evidence to demonstrate he has completed the required 10 hours of CPD; indeed, the evidential position at this time is that he has not completed the required 10 hours.
16. As set out above, there is no power to waive these provisions.
17. It is open to the Appellant to apply to restore his registration at any time following this appeal.

Committee's decision

18. The Committee had regard to the documentary evidence provided today and took account of the written submissions made on behalf of the GDC and those made by Mr Ibrahim in his Notice of Appeal. It heard and accepted the advice of the Legal Adviser.
19. The Committee first calculated the number of hours of CPD which Mr Ibrahim was required to undertake. The Committee was in agreement with the Registrar (and it is not in dispute on appeal) that he was required to complete at least 10 hours of verifiable CPD during his two-year CPD cycle. He is outstanding of 4 verifiable hours. The Committee was of the view that despite his personal circumstances, it considered that he could have completed this CPD prior to the deadline of 31 July 2025 and submitted an annual CPD statement as required.
20. The Committee was satisfied that Mr Ibrahim had not complied with this requirement.
21. The Committee has taken full account of the difficult personal circumstances Mr Ibrahim experienced. It noted the number of reminders that were sent by both email and text to Mr Ibrahim. The Committee determined that it was his responsibility to be familiar with the CPD requirements. Having carefully considered Mr Ibrahim's personal circumstances, the Committee did not consider these to amount to exceptional circumstances that would have prevented him from completing his CPD requirements in the statutory time frame or providing an annual CPD statement as required. As of today, Mr Ibrahim had only completed 6 hours of verifiable CPD in the requisite period. The Committee is satisfied that Mr Ibrahim was non-compliant with his CPD requirements.
22. The Committee was satisfied that the GDC has complied with the 2017 Rules in dealing with Mr Ibrahim's CPD requirements including the serving of the statutory notices on him.
23. The Committee also balanced the interests of Mr Ibrahim 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.
24. Accordingly, the appeal is dismissed. The Committee wished to remind Mr Ibrahim that it is open to him to apply for the restoration of his name to the Register upon completion of the required number of CPD hours.
25. This will be confirmed to Mr Ibrahim in writing.
26. That concludes this determination.