

## ON PAPERS

### Registration Appeals Committee (CPD Appeal)

25 March 2026

**Name:** WATTS, Rachel  
**Registration number:** 137100  
**Case number:** CAS-213529-X4J8R3

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**General Dental Council:** Megan Wolliner, ILAS

**Registrant:** Unrepresented

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**Outcome:** Appeal dismissed

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**Committee members:** Val Evans (Chair, Lay member)  
Katherine Barrett (DCP member)  
Gulshana Choudhury (Dentist member)

**Legal adviser:** Claire Robinson

**Committee Secretary:** Sarah Crewe

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1. This was an appeal hearing before the Registration Appeals Committee (RAC). The hearing was conducted remotely on Microsoft Teams.
2. The appeal was against the decision of the Registrar of the General Dental Council (the Council) to erase Miss Watts from the Register for apparent non-compliance with the statutory Continuing Professional Development (CPD) requirements. The hearing 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 hearing. The Committee first considered the issues of service and whether to proceed with the hearing on the papers in the absence of Miss Watts 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 Miss Watts and on the papers**

4. Notification of this appeal was sent to Miss Watts by Recorded Delivery and secure email on 17 February 2026 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 Miss Watts's appeal, dated 17 November 2025, informed Miss Watts 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 Miss Watts 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 Miss Watts by Recorded Delivery and secure email on 17 February 2026. The Committee did not receive the main bundle until the week before the hearing, however it considered that it had sufficient time to read and consider the papers in order to make a fully informed decision on this appeal.
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.

#### **Private Hearing**

8. 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 Miss Watt's health.

9. 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 Miss Watt's private life a private and public determination will be produced if required.

## Decision and reasons on the appeal

### Background

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 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.
11. The CPD Rules came into force on the 1 January 2018 and took effect in respect of dental care professionals on 1 August 2018.
12. 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.
13. Miss Watts 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 required minimum CPD requirement for the period 1 August 2023 to 31 July 2025.

### Summary

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

*Miss Rachel Jane Watts first registered with the General Dental Council ("the Council") as a dental care professional, with the title Dental Nurse, on 7 March 2008. Therefore Miss Watts'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 Miss Watts's registered email address. This reminder notified Miss Watts that her 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 August 2025. Miss Watts was advised that if she did not submit a compliant statement before the deadline, her registration may be put at risk.*

*On 10 June 2025, the Council also sent Miss Watts an Annual Renewal Notice letter by post to her registered address. A copy of the Annual Renewal Notice appears at pages 16 - 19. The Annual Renewal Notice is designed to remind registrants that their registration with the Council is due for renewal, of the need to pay their annual retention fee and make their indemnity declaration and of the need to make their CPD statement. Miss Watts was also reminded in this notice that she was required to submit her CPD statement by 28 August 2025. It was stated that Miss Watts would need to have completed at least 10 hours of CPD over the last two years.*

*On 7 July 2025, the Council sent an email to Miss Watts in which she was reminded that her Annual Renewal was due on or before 31 July 2025. It was noted that, although the Council had received her Annual Retention Fee, it was yet to receive her indemnity declaration. Miss Watts was reminded within this email to make her indemnity declaration by 31 July 2025 and of the need to complete her CPD statement by 28 August 2025.*

*On 12 June 2025, 18 July 2025 and 5 August 2025, the Council sent email reminders to Miss Watts's registered email address. These reminders notified Miss Watts that her CPD year was coming to an end. The reminders stated that she was required to submit her CPD statement by 28 August 2025. Miss Watts was notified that if she failed to submit a compliant CPD statement by this date, her registration may be put at risk. Between 12 August 2025 and 28 August 2025, the Council sent three SMS reminders regarding the CPD statement to Miss Watts's registered mobile number.*

*On 25 September 2025, the Council sent a notice under Rule 6 to Miss Watts by recorded delivery to her registered address. The notice stated that, although Miss Watts had submitted a CPD statement to the Council, 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 3 verifiable hours for the 2023-2024 CPD year and an annual CPD statement of 5 verifiable hours for the 2024-2025 CPD year. The notice stated that if Miss Watts wished to retain her registration, she should submit her CPD record to the Registrar by 23 October 2025 in order to demonstrate that she had met the requirement. Miss Watts 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 dental care professionals register.*

*On 26 September 2025, a copy of the notice was also sent via email to Miss Watts's registered email address.*

*On 7 October 2025, the Council received a letter from Miss Watts enclosing a copy of her Personal Development Plan and CPD certificates from 2023 – 2025. Miss Watts states:*

*“I am very disappointed in myself after realising I was short of the recommended minimum requirement for the 2 year period. I have familiarised myself with the CPD needed and I hope I will be given chance to redeem myself in the next 3 years. Please take into consideration I work at a small independent practice and I pay for my CPD and retention fee myself. This is the first time I have misjudged the CPD and I would like to apologise.*

*Please advise me going forward as this oversight will devastate me if my registration is in jeopardy”.*

*On 5 November 2025, the Council sent a Rule 8 notice to Miss Watts’s registered address by recorded delivery. This notice confirmed that Miss Watts had failed to provide a compliant CPD record demonstrating that she had met the minimum requirement for the period 1 August 2023 to 31 July 2025. Miss Watts’s evidence demonstrated that she had completed 3 hours of verifiable CPD between 1 August 2023 – 31 July 2024 and 5 hours of verifiable CPD between 1 August 2024 – 31 July 2025. This is not enough to meet the CPD requirements to complete a minimum of 10 hours of verifiable CPD for every two consecutive CPD year periods. Miss Watts was informed that her CPD remains deficient because she had 2 verifiable CPD hours outstanding and that she had not provided any evidence of exceptional personal circumstances which may have prevented her from completing her CPD as required. As a result, the Registrar had made the decision to remove her name from the dental care professionals register for non-compliance with the Rules. Miss Watts was notified that unless an appeal was submitted, the Registrar’s decision would take effect on 5 December 2025. On 6 November 2025, a copy of the notice was sent via email to Miss Watts’s registered email address.*

*On 8 November 2025, the Council received a webform enquiry from Miss Watts stating, “I’m concerned that I may be removed from the register. I was short by 2 hours. I have since completed more hours and do I submit this hours when I send my appeal application many thanks.”*

*On 11 November 2025, the Council sent an email to Miss Watts in response to her webform enquiry. The Council requested that Miss Watts review the contents of the Notice 8 issued on 5 November 2025 and respond accordingly. The Council explained that if Miss Watts wished to appeal, she should complete the Notice of Appeal attached to the Registrar’s decision letter and to include any supporting documents to accompany her appeal.*

*On 11 November 2025, the Council received a Notice of Appeal (“NOA”) via post from Miss Watts which confirmed that she wished to appeal against the decision to remove her from the dental care professionals register.*

*Within her NOA, Miss Watts explained that she was appealing the Rule 8 Notice on the grounds of having completed the 2 hours and further 8 hours to add to the previously 8 already submitted to bring her up to date.*

*Miss Watts explained that she hopes that this conveys that she is committed to carrying out her CPD throughout her CPD cycle to 2028. Miss Watts explained that this was the first time since being on the register that she had misjudged her CPD hours and apologises.*

*Miss Watts states, "[PRIVATE]"*

*Within Miss Watts's NOA, she explains that she has been qualified since 1990 and registered since 2008. Miss Watts explained that she understands the importance of being compliant and hopes she is given the chance to complete her CPD cycle.*

*Miss Watt's states that, "If I am erased from the register this will impact me and my employer greatly, we are a team of three, myself, my employer and the receptionist who is absent due to sickness, so I am currently carrying out her duties alongside my dental nursing".*

*Alongside her NOA, Miss Watts provided copies of her Personal Development Plan and CPD certificates.*

*On 14 November 2025, Miss Watts's further CPD evidence was assessed by an Operations Officer. It was concluded that Miss Watts had completed 8 hours of verifiable CPD, which was not enough to meet the Enhanced CPD requirements to submit 10 hours of CPD over two consecutive years for the years 1 August 2023 – 31 July 2025. The Council gave the following reasons for Miss Watts's non-compliance:*

- a) Miss Watts had 2 verifiable CPD hours outstanding.*
- b) Miss Watts's Cavity Training – Menopause Awareness Course certificate dated 10 July 2024 is unverifiable CPD.*
- c) 5 x certificates provided fall outside the cycle dates requested.*

## **Submissions**

15. It is the Registrar's position that Miss Watts 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 01 August 2023 to 31 July 2025, in accordance with Rule 2.
16. It is submitted by the Registrar that Miss Watts 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.

17. As of 14 November 2025, Miss Watts had completed 8 verifiable CPD hours between 1 August 2023 and 31 July 2025, which clearly breaches the requirement that dental care professionals submit evidence that they have completed a minimum of 10 verifiable CPD hours in each two-year period.
18. The Registrar acknowledges Miss Watts's challenging circumstances regarding her health. However, the Registrar submits that Miss Watts had sufficient opportunities to complete the required CPD during each period of two consecutive years, and that she ought to be aware of the requirements for continued registration with the GDC, which includes ongoing compliance with the CPD requirements.
19. The Registrar further acknowledges that Miss Watts has completed additional CPD but that this cannot be taken into account for the relevant period as it falls outside the cycle dates requested.
20. Miss Watts has provided additional information in the NOA that was not available to the Registrar at the time of the Rule 8 notice, the Committee is invited to consider whether this additional information alters the position, such that the Committee may consider exceptional circumstances exist in this case.
21. The Registrar submits that it is a Registrant's responsibility to ensure that they meet their CPD requirements, as CPD compliance is a legal requirement of registration.

### **Committee's decision**

22. The Committee had regard to the documentary evidence provided and took account of the written submissions made on behalf of the GDC and those made by Miss Watts in her NOA. It heard and accepted the advice of the Legal Adviser.
23. Having carefully considered the information before it, the Committee concluded that Miss Watts did not complete her required CPD hours for the period 1 August 2023 – 31 July 2025.
24. In its consideration of Miss Watts's personal circumstances, the Committee had regard to the health matters that Miss Watts outlined in her appeal documents. However, it concluded that there this does not amount to exceptional circumstances which would have prevented Miss Watts from complying with the requirements for her registration. There was no documentary evidence to support Miss Watts's account of her health, or detail as to why she could not have completed her 10 hours of CPD over a two year period. Further, it is the responsibility of a registrant to ensure that they meet all of the criteria for registration.
25. Accordingly, the appeal is dismissed. The Committee wished to remind Miss Watts that it is open to her to apply for the restoration of her name to the Register upon completion of the required number of CPD hours.

26. Unless Miss Watts exercises her right of appeal to the County Court (if their address is in England or Wales) or the sheriff in whose sheriffdom their address is located (if based in Scotland), in accordance with paragraph 6 of Schedule 4A to the Act, the erasure decision will take effect upon the expiry of the 28-day appeal period. It will then be open to Miss Watts to apply for the restoration of her name if she meets the CPD and other requirements for restoration.
27. This will be confirmed to Miss Watts in writing.
28. That concludes this determination.