

ON PAPERS**Registrations Appeal Hearing
CPD Appeal Hearing****21 April 2026****Name:** Griffith, Georgina**Registration number:** 280872**Case number:** CAS- 213947-F3X7J8

General Dental Council: Instructed by Ela Rexhaj, 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 Ms Griffith 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 Ms Griffith 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 Griffith had made no such request.
4. Notification of this appeal was sent to Ms Griffith by Recorded Delivery and secure email on 6 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.

Decision and reasons on the appeal

Background

6. 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.
7. The CPD Rules came into force on the 1 January 2018 and took effect in respect of dental care professionals on 1 August 2018.
8. 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.
9. Ms Griffith appealed against the Registrar's decision that despite her CPD being non-compliant because she failed to provide a compliant CPD record demonstrating that she had met the minimum requirement for the period of 01 August 2023 to 31 July 2025, she asked the Registrar to consider exceptional circumstances.

Summary

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

Ms Georgina Griffith first registered with the General Dental Council (“the Council”) as a dental care professional, with the title dental technician, on 03 December 2018. Therefore, in accordance with Rule 1 as set out above, Ms Griffith’s current CPD cycle began on 01 August 2024 and will end on 31 July 2029. Ms Griffith’s previous cycle commenced on 01 August 2019 and ended on 31 July 2024.

On 10 June 2025, the Council also sent Ms Griffith an Annual Renewal Notice letter by post to her registered address. 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 to make their indemnity declaration in addition, of the need, to make submit their CPD statement. Ms Griffith was also reminded in this notice that she was required to submit her CPD statement by 28 August 2025. It was stated that Ms Griffith would need to have completed at least 10 hours of CPD over the last two years.

On 12 June 2025, the Council sent an email reminder to Ms Griffith’s registered email address. The reminder, notified Ms Griffith that her 2024-2025 CPD year was coming to an end. She was prompted of the requirement to submit her CPD statement by 28 August 2025. Ms Griffith was notified that if she failed to submit a compliant CPD statement by this date, her registration may be put at risk. Ms Griffith was reminded of the requirement to have completed at least 10 hours of CPD over the last two years.

On 7, 18 July 2025 and 18 August 2025, the Council sent SMS reminders to the Appellants registered mobile number. These reminders, notified the Appellant that her 2024-2025 CPD Annual Statement is incomplete and directed her to sign onto eGDC and update her 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 Ms Griffith’s registered mobile number

Rule 6 notice

On 25 September 2025, the Council sent a notice under Rule 6 to Ms Griffith by recorded delivery to her registered address. The notice stated that, although Ms Griffith 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 eight verifiable hours for the 2023-2024 CPD year and an annual CPD statement of zero verifiable hours for the 2024-2025 CPD year. The notice stated that if Ms Griffith 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.

Correspondence with Ms Griffith

On 19 October 2025, the Council received an email from Ms Griffith. Ms Griffith explained that from February 2024 to June 2024, she employed as a Maxillofacial Prosthetist under an Honorary Contract. Following this period, from July 2024, she began travelling abroad which resulted in zero recorded hours of CPD in her current

cycle. Ms Griffith set out that although she continued to travel internationally, she intended to return to her clinical practice. Ms Griffith detailed that she was apologetic for the inconvenience or concern this caused and assured the Council that she values her professional registration and will ensure her CPD is up to date upon her return.

On 20 October 2025, the Council responded to Ms Griffith that it would review the CPD evidence provided and provide a response in due course. On the same day, the Council emailed Ms Griffith to clarify if she had completed any CPD during 01 August 2023 and 31 July 2025. The Council requested that Ms Griffith submit her CPD record, Activity log and Personal Development Plan before the deadline on 23 October 2025.

On 21 October 2025, the Council received further documentation from Ms Griffith, namely a personal development plan and CPD evidence.

Rule 8 notice

On 05 November 2025, the Council sent a Rule 8 notice to Ms Griffith's registered address by recorded delivery. This notice confirmed that Ms Griffith had failed to provide a compliant CPD record demonstrating that she had met the minimum requirement for the period 01 August 2023 to 31 July 2025 and that 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. Ms Griffith was informed that the evidence she had provided demonstrated that she had completed eight hours of verifiable CPD between 01 August 2023 – 31 July 2024 and zero hours of verifiable CPD between 01 August 2024 – 31 July 2025. This was not enough to meet her CPD requirements to complete a minimum of 10 hours of verifiable CPD for every two consecutive CPD year period.

Notice of Appeal

On 01 December 2025, the Council received a Notice of Appeal ('NOA') via email from Ms Griffith which confirmed that she wished to appeal against the decision to remove her from the dental care professionals register.

In her NOA, Ms Griffith set out the following grounds of appeal:

- **Previous record of good compliance:** Ms Griffith detailed that she has not previously experienced reduced hours, compliance issues, or any lapse in professional responsibility since joining the GDC register. She detailed that this situation was an isolated event that arose from exceptional circumstances. Ms Griffith detailed that she is fully committed to maintaining a complete CPD compliance, both now and in all future cycles. She explained that she understood the importance of staying clinically current to ensure safe, ethical, and effective patient care, and she is committed to ensuring that a situation of this nature does not occur again.
- **International travel:** Ms Griffith explained that the reduced CPD hours were due to a period of international travel following the completion of her clinical contract, rather than a disregard for her professional obligations.

- Ongoing commitment to CPD: Ms Griffith detailed that remained fully dedicated to the profession and intended to return to clinical practice as a Maxillofacial Prosthetist. She stated that she understands the GDC's CPD requirements and recognise its vital role in maintaining patient safety and public trust. She also detailed that she has already updated her PDP with a structured CPD strategy, scheduled new learning activities to ensure she exceeds future requirements, and implemented a personal monitoring system to maintain consistent compliance throughout every future cycle.

Along with her NOA, Ms Griffith attached a Personal development plan a IMPT webinar certificate.

On 08 December 2025, Ms Griffith's CPD evidence was assessed by a Registration Operations Officer. Ms Griffith was deemed to be non-compliant with her CPD requirements on the basis that:

- i) She is outstanding two verifiable CPD hours; and
- ii) The Council cannot accept IMPT Webinar Series certificate dated 23 January 2023 as it is out of cycle for the relevant period (01 August 2023 - 31 July 2025).

It was confirmed that, as of 08 December 2025, Ms Griffith had completed eight verifiable CPD hours between 01 August 2023 to 31 July 2025.

Submissions

11. In its written submissions, it is the Registrar's position that the Appellant 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 August 2023 to 31 July 2025, in accordance with Rule 2. Further, the Appellant did not provide a Personal Development Plan, and the Activity Log provided was not within the requested assessment period and was a duplication of one previously assessed. As set out in the legal framework, there is no power to waive these provisions.
12. It is submitted by the Registrar that the Appellant 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.
13. Ms Griffith submits that she did not complete CPD due to a period of international travel, in which she described as 'exceptional circumstances'. The Registrar submits that prior to the Rule 8 notice, Ms Griffith did not provide information or supporting evidence regarding exceptional circumstances for the Registrar to consider prior to exercising the discretion to erase. Further, the Registrar submits that a period of international travel would not fall within the scope of exceptional circumstances as per the GDC's Rule 8 guidance.
14. It is noted that Ms Griffith completed CPD outside the relevant period. The Registrar submits that any CPD completed outside of the relevant period (01 August 2023 – 31 July 2025) cannot be considered for the purpose of exercising the discretion to erase.
15. Further, Ms Griffith submitted that she has maintained a good record of CPD compliance previously. The Registrar submits that a previous record of CPD compliance cannot be considered for the purpose of this appeal. It is a registrant's responsibility to ensure that they

keep up to date with their registration requirements annually and during each five-year CPD cycle.

16. As of 08 December 2025, Ms Griffith had completed eight verifiable CPD hours between 01 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, even across two CPD cycles.
17. It is open to Ms Griffith to apply to restore her 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 Ms Griffith in her 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 Ms Griffith was required to undertake. The Committee was in agreement with the Registrar (and it is not in dispute on appeal) that she was required to complete at least 10 hours of verifiable CPD during her two-year CPD cycle. She is short of 2 verifiable hours. In addition, it noted that Ms Griffith completed some CPD outside of the relevant period (01 August 2023 – 31 July 2025). The Committee was of the view that despite her personal circumstances, it considered that she could have completed this CPD prior to the deadline of 31 July 2025.
20. The Committee was satisfied that Ms Griffith had not complied with this requirement.
21. The Committee has taken full account of the personal circumstances Ms Griffith experienced. It noted the number of reminders that were sent by both email and text to Ms Griffith. The Committee determined that it was her responsibility to be familiar with the CPD requirements. Having carefully considered Ms Griffith'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 Griffith had only completed 8 hours of verifiable CPD in the requisite period. The Committee is satisfied that Ms Griffith was non-compliant with her CPD requirements.
22. The Committee was satisfied that the GDC has complied with the 2017 Rules in dealing with Ms Griffith's CPD requirements including the serving of the statutory notices on her.
23. The Committee also balanced the interests of Ms Griffith 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 Ms Griffith 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.
25. This will be confirmed to Ms Griffith in writing.
26. That concludes this determination.

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