

ON PAPERS

Registrations Appeal Hearing CPD Appeal Hearing

23 March 2026

Name: Chamberlain, Melissa

Registration number: 292224

Case number: CAS- 213452-S8F8X4

General Dental Council: Instructed by Noranne Griffith, ILAS

Registrant: Unrepresented

Outcome: Appeal dismissed

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

Legal adviser: Claire Robinson

Committee Secretary: Jamie Barge

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 Miss Chamberlain 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 Miss Chamberlain 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 Miss Chamberlain had made no such request.
4. Notification of this appeal was sent to Miss Chamberlain by Recorded Delivery and secure email on 17 February 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. Miss Chamberlain 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 1 August 2023 and will end on 31 July 2025, and asked the Registrar to consider exceptional circumstances.

Summary

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

Miss Chamberlain first registered with the General Dental Council (“the Council”) as a dental nurse on 10 December 2020. Therefore, in accordance with Rule 1 as set out above, Miss Chamberlain’s current CPD cycle began on 1 August 2021 and will end on 31 July 2026. The CPD cycle which has been assessed and the evidence for which has been deemed non-compliant, and which is the subject of this appeal, is Miss Chamberlain’s CPD cycle of 1 August 2023 and will end on 31 July 2025.

On 22 May 2025, the Council sent an email reminder to the Appellant’s registered email address. This reminder notified the Appellant 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. The Appellant 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 sent the Appellant 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 make their indemnity declaration and of the need to make their CPD statement. The Appellant was also reminded in this notice that she was required to submit her CPD statement by 28 August 2025. It was stated that the Appellant would need to have completed at least 10 hours of CPD over the last two years, unless she was in the first year of her first CPD cycle.

On 12 June 2025, 7 July 2025, 18 July 2025 and 5 August 2025, the Council sent email reminders to the Appellant’s registered email address. These reminders, notified the Appellant 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.

The Appellant submitted an annual CPD statement for the 2024-2025 CPD year, declaring that she had completed four verifiable CPD hours.

Rule 6 notice

On 25 September 2025, the Council sent a notice under Rule 6 (the “Rule 6 notice”) to the Appellant by recorded delivery to her registered address. On 26 September 2025, a copy of the notice was also sent via email to the Appellant’s registered email address.

The Rule 6 notice stated that, although the Appellant 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 zero verifiable hours for the 2023-2024 CPD year and an annual CPD statement of four verifiable hours for the 2024-2025 CPD year.

Correspondence with Miss Chamberlain

On 14 October 2025, the Appellant emailed the Council in response to the Rule 6 notice. The Appellant apologised for not meeting the CPD requirement. She

explained that she was studying full time for a university degree, had only been working occasionally as a dental nurse and that unfortunately with her academic and “placement” commitments, her CPD requirements had “slipped her mind” and she had not completed the necessary verifiable hours within the two year period. The Appellant requested that her situation be taken into consideration

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 provide a compliant CPD record demonstrating that she had met the minimum requirement for the period 1 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. The Rule 8 notice explained that the matters put forward in the Appellant’s email of 14 October had been considered in line with the “Guidance on the Registrar’s Discretion to Erase for CPD Non-Compliance” but that they did not amount to exceptional circumstances.

Notice of Appeal

On 6 November 2026, the Council received a Notice of Appeal (“NOA”) via email from Miss Chamberlain writing to appeal the decision regarding her removal from the register for CPD non-compliance. The NOA set out the following matters:

- a. That the Appellant was a full time student and working part time as a dental nurse;
- b. That over the past few months [IN PRIVATE] she had been “coming to terms with some upsetting personal news, which affected my ability to complete her CPD by the July 2025 deadline”; and
- c. That the Appellant had now completed 10.5 hours of verifiable CPD which was attached to the email along with her PDP and CPD Activity Log.

On 10 November 2025, the Appellant’s CPD evidence was assessed by a Registration Operations Officer. The Appellant was deemed to be non-compliant with her CPD requirements on the basis that she had completed zero verifiable CPD hours outstanding for the period 1 August 2023 to 31 July 2025. It was noted that the CPD certificates provided by the Appellant in support of her appeal were for courses completed outside of the relevant period.

On 13 November 2025, the Council received a formal written NOA via post from Miss Chamberlain. Miss Chamberlain confirmed that she wished to appeal against the decision to remove her name from the dental care professional’s register.

Submissions

11. In its written submissions, the Council’s position is 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. 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.

12. As of 10 November 2025, the Appellant had completed zero 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. As set out above, there is no power to waive these provisions.
13. The reasons put forward by the Appellant in her NOA for her non-compliance are not sufficient to amount to exceptional personal circumstances. Evidently, the Appellant was not prevented from working during the period under consideration. The Appellant has not provided any evidence that she attempted to meet her CPD requirements during the relevant period and the shortfall is for the entire required number of hours. CPD hours completed outside 1 August 2023 and 31 July 2025 are not relevant.
14. It is open to Miss Chamberlain to apply to restore her registration at any time following this appeal.

Committee's decision

15. 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 Miss Chamberlain in her Notice of Appeal. It heard and accepted the advice of the Legal Adviser.
16. The Committee first calculated the number of hours of CPD which Miss Chamberlain was required to undertake. The Committee was in agreement with the Registrar (and it is not in dispute on appeal) that Miss Chamberlain was required to complete at least 10 hours of verifiable CPD in the two year period between 1 August 2023 to 31 July 2025. She is short of 10 verifiable hours. 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 2026.
17. The Committee was satisfied that Miss Chamberlain had not complied with this requirement.
18. The Committee has taken full account of the circumstances Miss Chamberlain experienced. It noted the number of reminders that were sent by both email and text to Miss Chamberlain. The Committee determined that it was her responsibility to be familiar with the CPD requirements. Having carefully considered Miss Chamberlain'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. **[IN PRIVATE]** The Committee has sympathy for the Appellant. However, she had been working and had ample opportunities to meet her CPD requirements. As of today, Miss Chamberlain had completed zero hours of verifiable CPD in the requisite period. The Committee is satisfied that Miss Chamberlain was non-compliant with her CPD requirements.
19. The Committee was satisfied that the GDC has complied with the 2017 Rules in dealing with Miss Chamberlain's CPD requirements including the serving of the statutory notices on her.
20. The Committee also balanced the interests of Miss Chamberlain 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.

21. Accordingly, the appeal is dismissed. The Committee wished to remind Miss Chamberlain 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.
22. This will be confirmed to Miss Chamberlain in writing.
23. That concludes this determination.

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