

## ON PAPERS

### Registration Appeals Committee CPD Appeal

21 April 2026

**Name:** BRADLEY, Saoirse Ann

**Registration number:** 306515

**Case number:** CAS-214148-F7Z8X6

---

**General Dental Council:** Not present. Sushuma Chandrasekhar of IHLAS.

**Registrant:** Not present. Not represented.

---

**Outcome:** Appeal dismissed

---

**Committee members:** Val Evans (Chair) (Lay)  
James Maughan (Dentist)  
Soheila Asabi (DCP)

**Legal Adviser:** Helen Gower

**Committee Secretary:** Paul Carson

---

1. Miss Bradley is a registered dental nurse who appeals against the decision of the registrar to erase her name from the DCP register for non-compliance with her Continuing Professional Development (CPD) requirement.
2. The Committee met remotely today using Microsoft Teams and considered the appeal on the papers. Neither party had requested an oral hearing and the Committee considered that it would be desirable to determine the appeal without one. The Committee was satisfied that the Hearings Director had served notification of this meeting on the parties with at least 28 days' notice in accordance with Rules 5(2) and 5(3) of the General Dental Council (Registration Appeals) Rules 2006.

### Background

3. Miss Bradley first registered with the GDC as a dental nurse on 29 March 2023. Her CPD cycle runs from 1 August 2023 to 31 July 2028. In accordance with the General Dental Council (Continuing Professional Development) (Dentists and Dental Care Professionals) Rules 2017 (the "Rules"), she is required to complete a minimum of 50 hours of CPD activity over the CPD cycle (Rule 2(1)), with at least 10 hours to be completed during each period of two consecutive CPD years (running 1 August to 31 July) within that cycle (Rule 2(5)(b)).
4. Rule 2(6) of the Rules provides that CPD activity must be verifiable, with documentary evidence from the provider confirming, among other things, the subjects, learning content, aims, objectives and anticipated learning outcomes of the CPD and the date that the CPD was undertaken. Confirmation must also be provided that the CPD activity is subject to prescribed quality assurance measures.
5. In accordance with Rule 3(1) of the Rules, Miss Bradley is required to keep a log of all the CPD that she plans to undertake and had undertaken during the CPD cycle. Rule 4(1) requires her to submit an annual statement of her CPD activity to the registrar within 28 days of the end of each CPD year stating the hours which had been undertaken for that year, with the annual statement submitted in the final year of the CPD cycle also to include the total number of hours which had been undertaken during the cycle (Rule 4(2)).
6. Rules 6 and 7 of the Rules prescribe various notification requirements under which the registrar may require a practitioner to, among other things, submit their CPD record and/or provide evidence of their compliance with the CPD requirement.
7. Rule 8 of the Rules provides that the registrar '*may erase the practitioner's name*' in circumstances where the practitioner has either failed to comply with a notice sent under Rule 6 or 7, or where the registrar is not satisfied from the response provided by the practitioner that they have met the CPD requirement or other related obligations under the Rules.
8. A decision of the registrar to erase under Rule 8 is an appealable decision under paragraph 2(1)(h) of Schedule 4A to the Dentists Act 1984. In accordance with paragraph 4(5) of that Schedule, erasure shall not take effect until after the disposal of the appeal proceedings.

9. Between 22 May 2025 and 28 August 2025, the GDC sent Miss Bradley various automated reminders by email, post and SMS message relating to the annual renewal of her registration and her annual CPD statement, which she was required to submit by 28 August 2025. Miss Bradley was reminded that she would need to demonstrate at least 10 hours of CPD for each consecutive two CPD year period.
10. On 25 September 2025, the GDC wrote to Miss Bradley under Rule 7 of the Rules to state:

*'Further to our reminders, our records show you did not complete your CPD submission for the cycle year **1 August 2024 – 31 July 2025** by the deadline of **28 August 2025**. Not complying with the CPD requirements for this period puts your registration and ability to practise at risk.*

*You must now make your CPD statement online or return the statement below by **23 October 2025** to ensure compliance with your CPD requirement. If we do not receive your statement by this date, **you may be at risk of being removed from the Register.***

11. On 5 November 2025, the GDC wrote to Miss Bradley under Rule 6 of the Rules to state:

*'Thank you for submitting your CPD statement this year. However, our records show that you have not declared enough hours to meet the requirement of completing a minimum of 10 hours of CPD over two consecutive years. This puts your registration and ability to practise at risk.*

*You had previously submitted a 2023-2024 CPD Annual statement of **4** verifiable hours and you have recently submitted a 2024-2025 CPD statement of **2** verifiable hours.*

***What you need to do now***

*To stay on the Register, you will need to send to us your CPD record to demonstrate that you have met the requirement between **1 August 2023 – 31 July 2025**. Please provide a copy of your CPD record, including any documentary evidence as detailed below by **3 December 2025**. Please let us know if there were any reasons or exceptional circumstances that meant you were unable to submit a compliant statement this year. We will consider these when deciding whether to take any further action.'*

12. The documentary evidence referred to in the Rule 6 notice included a Personal Development Plan, a log or summary of the CPD activity undertaken between 1 August 2023 and 31 July 2025 and the corresponding certificates or other documentary evidence of each CPD activity.
13. On 12 November 2025, Miss Bradley wrote to the GDC by email to state that she was unable to complete her CPD hours for the required period as she was not living or practising in the United Kingdom. She apologised for this oversight, stating it was not her intention to be non-compliant and that she regrets any inconvenience caused. She explained that she experienced practical difficulties whilst living overseas over the previous six months in relation to securing accommodation and maintaining an income,

which meant that she had forgot about her CPD. She explained that she would be returning to the UK in 2026 and was keen to remain on the DCP register, asking for guidance on how she could complete the required hours on her return.

14. On 1 December 2025, Miss Bradley sent a further email to the GDC in which she attached screenshots of the CPD which she had undertaken along with her log and Personal Development Plan.
15. On 9 December 2025, the GDC wrote to Miss Bradley under Rule 8 of the Rules to state:

*'Further to our letter dated 5 November 2025, you have failed to provide a compliant CPD record demonstrating that you have met the minimum requirement for the period 1 August 2023 – 31 July 2025. As a result, the Registrar is not satisfied that you have complied with the rules.*

*Your evidence demonstrates that you have completed 0 hours of verifiable CPD between 1 August 2023 – 31 July 2024 and 1 hours of verifiable CPD between 1 August 2024 – 31 July 2025. This is not enough to meet your CPD requirements to complete a minimum of 10 hours of verifiable CPD for every two consecutive CPD year period.*

*Your CPD remains deficient because:*

- You have failed to provide sufficient evidence that demonstrates compliance with the CPD requirement of completing 10 hours of verifiable CPD over 2 consecutive years.*
- You are outstanding 9 verifiable CPD hours.*
- 3x Screenshots provided within your email dated 03 December 2025 are illegible.*

*We have considered the evidence provided namely email dated 11 November 2025. We have applied the guidance on the registrar's discretion to erase for CPD non-compliance.*

*We have identified the following factors:*

- 1. The events you have described were not exceptional personal circumstances beyond your control.*
- 2. Notwithstanding your circumstances, no evidence has been provided to confirm you have not been able to continue working as a dental professional.*
- 3. There is no evidence that you have attempted to meet your CPD or otherwise engaged positively with your CPD requirements, notwithstanding your personal circumstances.*
- 4. There is evidence that the reason you failed to meet the CPD requirements is because you were not aware of them.*

*The Registrar has therefore made the decision to remove your name from the dental care professional register for non-compliance with the General Dental Council's CPD requirement.*

## The Appeal

16. On 29 December 2025, Miss Bradley lodged a notice of appeal against the registrar's decision and included with her appeal a copy of her CPD records and a work reference. In the intervening period she had also corresponded with the GDC to express concern regarding the fairness of the registrar's decision and the way in which her CPD hours had been calculated (albeit accepting that her hours would in any event fall short of the required 10 hours). She was advised by the GDC that she needed to lodge an appeal if she wished to challenge the decision.
17. In her notice of appeal, Miss Bradley explained that she that she was on a career break overseas and was not working as a dental nurse. She explained that she was working long hours in a different field and experienced practical difficulties in relation to securing accommodation and maintaining a stable income. She stated that these factors resulted in an oversight on her part in completing her CPD hours. She acknowledged that it was her responsibility to ensure that she is compliant with her CPD requirement and she apologised for her oversight, indicating her remorse and stating that she is committed to professional standards. She stated that the oversight was not intentional and does not reflect her usual approach to her professional responsibilities.
18. Miss Bradley explained that she intended to return to the UK in 2026 and that, if removed from the DCP register, she would be unable to work as a dental care professional which would adversely impact her, as she is planning on furthering her education in either hygiene or orthodontic therapy. She requested that the Council take into consideration the circumstances that led to her non-compliance, as well as her commitment to professional standards. She stated that she has put in place plans to ensure full compliance with CPD requirements so that this situation does not arise again. She stated that she values her professional registration and remains fully committed to upholding the standards expected.
19. On 8 January 2026, the GDC assessed Miss Bradley's notice of appeal and determined that she remains non-compliant with her CPD requirements for the following reasons:
- 'Reasons the CPD evidence is non-compliant are:*
- Miss Saoirse Bradley is outstanding 4 verifiable CPD hours.*
- As of 08 January 2026, this registrant has completed 6 hours of verifiable CPD, this is not enough to meet the Enhanced CPD requirements to submit 10 hours of CPD over 2 consecutive years for the years 2023-2025*
- Miss Saoirse Bradley must provide a further 4 hours of verifiable CPD evidence for the years 1 August 2023 to 31 July 2025.'*
20. The registrar's position in response to the appeal, as set out in the GDC Case Summary dated 15 January 2026, is that Miss Bradley was therefore non-compliant with her CPD requirement and that she *'was reminded on numerous occasions of the need to complete her CPD hours and of the requirement to complete at least 10*

verifiable CPD hours during the period 1 August 2023 to 31 July 2025'. In respect of the mitigation put forward by Miss Bradley, the registrar's response is as follows:

*'The Registrar refers to the Council's Guidance on the Registrar's Discretion to Erase for CPD Non-Compliance, May 2025. The Registrar notes, in particular:*

*i. paragraph 12 which states that, "in pursuit of the over-arching objective, the threshold is necessarily high";*

*ii. paragraph 17 which refers to a registrant's failure to meet CPD requirements due to lack of awareness; and*

*iii. paragraph 18(d) which refers to "the adverse impact on a registrant, or their employer, of immediate erasure (such as job loss, financial and resourcing consequences. [sic]*

*The Registrar acknowledges Miss Bradley's regret and her explanations and expresses sympathy for her personal circumstances. Given the 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 alters the position, such that the Committee may consider exceptional circumstances exist in this case.*

*It is open to Miss Bradley to apply to restore her registration at any time following this appeal.'*

### Decision

21. The Committee accepted the advice of the Legal Adviser.
22. The first consideration for the Committee was whether Miss Bradley had complied with her CPD requirement by completing a minimum of 10 verifiable hours for the period 1 August 2023 to 31 July 2025. The Committee was satisfied that she only demonstrates a total of 6 verifiable hours of CPD during that period and that there is therefore a shortfall of 4 hours. Accordingly, the Committee was satisfied that Miss Bradley was not compliant with her CPD requirement (as is not disputed by her).
23. The Committee was satisfied that the registrar's decision to erase was reached correctly in accordance with the Rules and following repeated reminders to Miss Bradley of her CPD requirement.
24. The Committee next considered the permissive terms of Rule 8 of the Rules, which confer a discretion on the registrar in relation to erasure: whilst the CPD requirement itself is mandatory, enforcing that requirement by erasing a non-compliant practitioner is a matter of discretion. The question of proportionality therefore arises. In considering this, the Committee had regard to the GDC's *Guidance on the Registrar's Discretion to Erase for CPD Non-Compliance* (May 2025) (the 'Guidance'). The Committee noted that the GDC's reference in its Case Summary paragraph 18(d) appears to be in reference to an earlier version of the Guidance and should instead refer to 19(d) in the current May 2025 version of the Guidance.
25. The Committee noted that the CPD requirement is a mandatory statutory requirement which applies to all registered dental professionals. Compliance is important in helping

to ensure public protection and maintaining wider public confidence in the profession, so as to meet the overarching objective of the GDC under section 1 of the Act. The Committee further noted that Miss Bradley has neither practised nor adhered to her CPD requirement over the past two years as part of a 'career break', which gives rise to a risk of deskilling.

26. The Committee had regard to the personal mitigating circumstances put forward by Miss Bradley in her notice of appeal and in her earlier correspondence with the GDC. However, those circumstances would not amount to exceptional circumstances for the purposes of the Guidance. The Committee considered that Miss Bradley would in any event have had sufficient time over the two-year period in question to have completed the outstanding 4 hours. She would have been able to complete the outstanding four hours whilst overseas, as CPD activity can be completed online.
27. The Committee recognised that this shortfall in hours appears to have been the result of a genuine oversight by Miss Bradley whilst she was working overseas outside of dentistry. However, it was her responsibility to ensure that she understood her CPD requirement and that she complied with it. In this regard she had been sent numerous reminders by the GDC regarding her CPD requirement and annual declaration. Those reminders were sent to the registered address she had provided and were also sent by email and text message.
28. Having regard to all the circumstances, the Committee determined that there are no grounds on which this appeal could be allowed. Miss Bradley was in breach of her CPD requirement for which there are not exceptional or extenuating circumstances which might make the registrar's decision to erase disproportionate. Her circumstances were entirely voluntary and foreseeable in terms of her decision to take a career break and she should have planned ahead in terms of adhering to her CPD requirement, particularly as it was her intention to resume practice upon returning to the UK.
29. Accordingly, this appeal is dismissed. Unless Miss Bradley exercises her right of appeal to the County Court, the erasure shall take effect upon the expiry of the 28-day appeal period. It will then be open to Miss Bradley to apply for the restoration of her name to the DCP register.
30. That concludes this determination.