

PUBLIC HEARING**Professional Conduct Committee
Initial Hearing****27 – 30 July 2026****Name:** STRAFFORD, Andrea**Registration number:** 156403**Case number:** CAS-209863-X0B3N4

General Dental Council: Eleanor Curzon, Counsel
Instructed by Jalpa Patel, IHLPS**Registrant:** Not Present
Unrepresented

Fitness to practise: Impaired by reason of misconduct**Outcome:** Erased with Immediate Suspension**Immediate order:** Immediate suspension order

Committee members: Adrian Smith (Chair, Lay Member)
Miraj Shah (Dentist Member)
Alexandra Ward (Dental Care Professional Member)**Legal adviser:** Melanie Swinnerton**Committee Secretary:** Andrew Keeling (27 to 29 July 2026)
Jenny Hazell (30 July 2026)

Findings of Fact – 30 July 2026

1. This is a Professional Conduct Committee (PCC) hearing in respect of an allegation against Mrs Strafford that her fitness to practise is impaired by reason of misconduct. The hearing was conducted remotely via Microsoft Teams. Mrs Strafford is neither present nor represented at the hearing. Miss Eleanor Curzon, Counsel, is the Case Presenter for the General Dental Council (GDC).
2. The Committee first considered the issues of service and whether to proceed with the hearing in the absence of Mrs Strafford. The Committee received written submissions and heard oral submissions from Miss Curzon. It heard and accepted the advice of the Legal Adviser as to the provisions of the GDC (Fitness to Practise) Rules Order of Council 2006 ('the Rules') and the approach it should take to its decision.

Preliminary Matters**Decision on Service of the Notice of Hearing (27 July 2026)**

3. The Committee received from the GDC an indexed bundle, which contained a copy of the Notice of Hearing ('the notice'), dated 9 June 2026. The documents before the Committee showed that the notice was sent to Mrs Strafford's registered address by Special Delivery, by first class post and secure email.
4. The Committee was satisfied that the notice sent to Mrs Strafford contained proper notification of today's hearing. This included the hearing's time, date and that it will be taking place remotely on Microsoft Teams, and the other prescribed information including notification that the Committee had the power to proceed with the hearing in Mrs Strafford's absence. The notice was also sent within the prescribed time, being no later than 28 days before the hearing date.
5. In the circumstances, the Committee was satisfied that the notice had been properly served on Mrs Strafford, in accordance with Rules 13 and 65.

Decision on Proceeding in the Registrant's Absence (27 July 2026)

6. The Committee next considered whether to exercise its discretion under Rule 54 of the Rules to proceed with the hearing in the absence of Mrs Strafford. The Committee approached the issue of proceeding in absence with the utmost care and caution. It took into account the factors to be considered in reaching its decision, as set out in the case of *R v Jones (Anthony)* [2002] UKHL 5 and *GMC v Adeogba & Visvardis* [2016] EWCA Civ 162. It remained mindful of the need to be fair to both Mrs Strafford and the GDC, taking into account the public interest and Mrs Strafford's own interests.
7. The Committee was satisfied that the GDC had taken all possible steps to notify Mrs Strafford of the hearing. There has been no response from her in relation to the notice and there has been no request for an adjournment. The Committee concluded that she has voluntarily absented herself from today's hearing. The Committee further considered that adjourning the hearing would not serve any useful purpose as there was no reason to believe that Mrs Strafford would attend any future hearing owing to her lack of engagement with these proceedings. The Committee was also mindful that a GDC witness is scheduled to attend the hearing today to give evidence and any adjournment would affect the availability of this witness, who is currently only available today.
8. Therefore, having weighed the interests of Mrs Strafford with those of the GDC and the public interest in an expeditious disposal of this hearing, the Committee determined that it was fair and in the public interest to proceed in Mrs Strafford's absence.

Background and Summary of Allegations

9. Miss Curzon opened the case for the GDC and provided a background of the events to the Committee. She informed the Committee that Mrs Strafford registered with the GDC as a Dental Nurse in July 2008 and has no previous fitness to practise history. In September 2024, Mrs Strafford was employed as a Dental Nurse at a practice where she had been working for 10 years. She was also part of the management team at the practice. Miss Curzon stated that the allegations against Mrs Strafford are that on 5 September 2024 she accessed the safe at the practice without authorisation and took envelopes of money. She referred the Committee to the GDC's witness statement of Person A and the CCTV footage, which allegedly shows Mrs Strafford taking money from the safe.

10. Miss Curzon stated that Person A interviewed Mrs Strafford on 12 September 2024 about the incident on 5 September 2024 in the presence of two other members of staff. She stated that it was recorded at that meeting that Mrs Strafford had admitted taking money from the safe. Mrs Strafford was subsequently dismissed for gross misconduct. Person A did not report the matter to the police but referred Mrs Strafford to the GDC on 21 September 2024.

11. It is further alleged by the GDC that Mrs Strafford failed to co-operate with the GDC's investigation into this matter.

Evidence

12. By way of factual evidence from the GDC, the Committee was provided with witness statements and associated exhibits from the following:

- Person A, dated 19 February 2026; and
- Talli Shaw, Caseworker Manager in the Fitness to Practise team, dated 19 February 2026.

13. The Committee also heard oral evidence from Person A. Ms Shaw's witness statement was accepted into evidence by the Committee without the need for her to attend the hearing to give evidence.

Rule 18 Application to Amend the Charge (27 – 29 July 2026)

14. Following the conclusion of Person A's oral evidence, Miss Curzon made an application under Rule 18 to amend the head of charge 1. She submitted that the word '*approximately*' should be included before '£240'. She proposed that head of charge 1 should now read as follows:

- 1. On 5 September 2024 at around 5pm you removed approximately £240 from the safe at [the Practice].*

15. Miss Curzon submitted that the proposed amendment is in line with the overall oral evidence of Person A in respect of the exact amount of money that was allegedly taken from the safe. She submitted that it does not expand the scope of the case and there would be no material injustice caused to Mrs Strafford. Furthermore, she submitted that there would be no prejudice caused to Mrs Strafford in proceeding in her absence if the charge were to be amended.

The Committee's decision on the Rule 18 application

16. The Committee accepted the advice of the Legal Adviser on the Rule 18 application.

17. When considering the application, the Committee was mindful that Mrs Strafford was not in attendance at the hearing and has not engaged with these proceedings. Nevertheless, it considered the stage the hearing has reached and noted that, if agreed, the proposed amendment would widen the scope of the charge. Therefore, it determined that, before it made its decision, Mrs Strafford should be given the opportunity to make any comments on the application if she so wished.

18. The Committee also informed Miss Curzon that it would be helpful if the GDC could obtain any further evidence from Person A relating to how he had concluded that the amount of £240 was allegedly taken from the safe by Mrs Strafford. The Committee suggested that this could include evidence from the software accounting system at the practice as referred to by Person A in his evidence.

19. The Committee subsequently adjourned the hearing until 9:30 a.m. on 29 July 2026 to allow these enquiries to be made.

20. When the Committee resumed on 29 July 2026, Miss Curzon informed the Committee that the GDC had written to Mrs Strafford as instructed but no response had been received. Miss Curzon provided the Committee with a copy of the email sent to by the GDC to Mrs Strafford, dated 27 July 2026.

21. Furthermore, she submitted that the GDC had tried calling and emailing Person A, but had also received no response.

22. The Committee heard and accepted further legal advice from the Legal Adviser regarding the application. This included advice in respect of the meaning of the word, '*approximately*'.

23. The Committee took into account that Mrs Strafford was given an opportunity to comment on the proposed amendment and no response had been received. Taking this into consideration, the Committee was satisfied that the proposed amendment could be made, prior to closing submissions from the GDC, without injustice to Mrs Strafford.

24. The Committee, therefore, acceded to Miss Curzon's application to amend the charge.

The Committee's Findings of Fact (30 July 2026)

25. The Committee has considered all the oral, documentary and video evidence presented to it. It took account of the submissions made by Miss Curzon, on behalf of the GDC. The Committee had no written representations from Mrs Strafford.

26. The Committee heard and accepted the advice of the Legal Adviser. It has considered each head of charge separately, bearing in mind that the burden of proof rests with the GDC and that the standard of proof is the civil standard, that is, whether the alleged matters are found proved on the balance of probabilities. In making its findings, the Committee drew no adverse inference from the absence of Mrs Strafford from this hearing.

27. The Committee's findings in relation to each head of charge are as follows:

1.	On 5 September 2024 at around 5pm you removed approximately £240 from the safe at [the Practice]. Found Proved
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When determining this head of charge, the Committee gave careful consideration to Person A's evidence. This included his signed GDC witness statement, the CCTV footage and his oral evidence.

When viewing the CCTV footage, the Committee was satisfied that this showed Mrs Strafford accessing the safe at the practice and withdrawing at least one envelope, placing it under the desk before placing into her pocket. Mrs Strafford then returned later to access the safe and replaced one envelope with another envelope from the safe. The Committee observed that Mrs Strafford proceeded to place this envelope in her pocket. The Committee also observed from the footage that these envelopes contained money.

The Committee also noted from Person A's witness statement and oral evidence that he stated that Mrs Strafford had admitted to taking money from the safe during the disciplinary meeting on 12 September 2024. In his statement, Person A stated that:

'The Registrant entered the office and within seconds stated, "I know what this is about, you don't need to tell me". I was taken aback but then proceeded to put the CCTV on. However, as I did this, the Registrant said, "I don't need to see this, I took the money". So, I asked her why, but she said she did not know why and did not provide a reason. She offered to repay the money she took from the safe.'

When questioned about this during his oral evidence, Person A informed the Committee that these quotes from Mrs Strafford were recorded in the contemporaneous notes of the disciplinary meeting. However, the Committee was not provided with those contemporaneous notes or any evidence from the person who had compiled them. In the light of this, the Committee decided, on the balance of probabilities, that Person A's evidence about what Mrs Strafford had said at the meeting was accurate because it was based on his own recollection. However, without sight of those contemporaneous notes the Committee could not be satisfied that those quotes, stated to have been from Mrs Strafford, were verbatim.

Furthermore, the Committee noted the following from the 'Disciplinary Summary Sheet' document that Mrs Strafford, *'admitted to the theft without further need to view the evidence. She expressed regret for her actions and indicated that she did not want to lose her job, offering to repay the stolen funds.'*

Although this document was dated erroneously as 5 September 2024, Person A confirmed in oral evidence that the report would have been written either on 12 September 2024 or soon afterwards and the Committee considered this evidence to be both contemporaneous and consistent with Person A's clear oral evidence.

Overall, the Committee considered Person A's evidence to be reliable and helpful. The Committee took into account that there was insufficient evidence to demonstrate the exact amount of money allegedly taken by Mrs Strafford. However, it was satisfied from Person A's oral evidence about how he had calculated the amount of money missing using the practice's accounting procedures that this would have amounted to *'approximately'* £240.

Taking into consideration all of the above, therefore, the Committee determined that it was more likely than not that Mrs Strafford had removed approximately £240 from the practice's safe on 5 September 2026.

	Accordingly, the Committee found this head of charge proved.
2.	Your conduct in relation to 1 above was: a. misleading; and/or Found Not Proved On the basis of the evidence before it, and mindful that the burden rests entirely on the GDC, the Committee did not find, on the balance of probabilities, that Mrs Strafford's conduct in removing approximately £240 from the safe at the practice on 5 September 2024 was misleading. In particular, the Committee noted that when challenged, Mrs Strafford fully admitted to the theft. Accordingly, the Committee found this head of charge not proved. b. dishonest, in that you knew you did not have permission to remove the money. Found Proved When considering this charge, the Committee referred to the test set out in the case of <i>Ivey v Genting Casinos (UK) Ltd. t/a Crockfords</i> [2017] UKSC 67. It first considered the actual state of Mrs Strafford's knowledge or belief as to the facts at the time and whether it was genuinely held. The Committee then considered whether her conduct would be viewed as dishonest by the objective standards of ordinary and decent people. The Committee accepted Person A's consistent oral and documentary evidence that, at the beginning of the meeting at the practice on 12 September 2024, Mrs Strafford had admitted that she had taken money from the safe. The Committee considered Person A's evidence about this as credible and consistent with the contemporaneous evidence contained in the 'Disciplinary Summary Sheet'. Furthermore, the Committee took into account the CCTV footage in which it could be seen that Mrs Strafford was acting surreptitiously when accessing the safe. The nature of her actions suggested to the Committee that she was aware that she was acting inappropriately by taking money from the safe, particularly when she accessed the safe a second time. The Committee was satisfied that Mrs Strafford would have been aware at the time that she was not authorised to take any money from the safe. At that time, Mrs Strafford had been working at the practice for approximately 10 years and would, the Committee considered, have been fully aware of her role and her responsibilities. The Committee determined that her actions in taking money from the practice's safe, which she was not entitled to, would be considered to be dishonest by the objective standards of ordinary and decent people. Accordingly, the Committee found this head of charge proved.
3.	From 29 October 2024 until at least 02 December 2024, you failed to cooperate with the General Dental Council's investigation into your fitness to practise.

	Found Proved The Committee took into account Ms Talli Shaw's witness statement when considering this head of charge. It noted that Mrs Strafford had initially responded to the GDC's pathfinder email on 28 October 2024 confirming that her email address was correct. However, there is no further evidence of Mrs Strafford responding to any subsequent correspondence sent to her. The Committee noted that the GDC sent the following documents to Mrs Strafford: • Notice of complaint, dated 29 October 2024; • Chaser letter via email, dated 13 November 2024; • Chaser letter and email, dated 21 November 2024; Additionally, the Committee noted that on 2 December 2024 the GDC tried to call Mrs Strafford. The Committee noted that Mrs Strafford had a duty to comply with the GDC's investigation as outlined in the GDC Standards: <i>9.4 You must co-operate with any relevant formal or informal enquiry and give full and truthful information.</i> The Committee concluded that in not responding to the GDC's correspondence, Mrs Strafford had failed to co-operate with the GDC's investigation into her fitness to practise. Accordingly, the Committee found this head of charge proved.
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28. We move to Stage 2.

Stage Two of the hearing – 30 July 2026

29. At this second stage of the hearing, the Committee has had to consider whether the facts founds proved against Mrs Strafford amount to misconduct, and if so, whether her fitness to practise is currently impaired by reason of misconduct. The Committee took into account that if it found current impairment on the ground of misconduct, it would need to consider what sanction, if any, to impose on Mrs Strafford's registration.

30. In reaching its decisions, the Committee considered all the evidence presented to it at the fact-finding stage. It received no further evidence at this second stage.

31. The Committee took account of the submissions made by Miss Curzon on behalf of the GDC in relation to misconduct, impairment and sanction. It accepted the advice of the Legal Adviser. The Committee bore in mind that its decisions were for its independent judgement. There is no burden or standard of proof at this stage of the proceedings. The Committee has also had regard to the GDC's '*Guidance for the Practice Committees including Indicative Sanctions Guidance*' (January 2026) (the GDC's Guidance).

Summary of the GDC's submissions

32. In opening the case for the GDC, Miss Curzon informed the Committee that Mrs Strafford has no fitness to practise history.

33. Miss Curzon submitted that Mrs Strafford's dishonest conduct amounts to a serious departure of the standards expected of a registered dental professional. She further submitted that Mrs Strafford's failure to co-operate with her regulator over a period of at least a month is a serious matter and amounts to a failure to adhere to her professional obligations.

34. Miss Curzon cited a number of the GDC's '*Standards for the Dental Team*' (September 2013) which were applicable in this case. This included standard 1.3, 9.1 and 9.4, in particular 9.4.1. Miss Curzon submitted that the facts found proved against Mrs Strafford can be properly judged to be serious and amount to misconduct.

35. Miss Curzon submitted that Mrs Strafford's fitness to practise is currently impaired by reason of misconduct on the grounds of public protection. She submitted that there is no evidence of any remediation such as targeted Continuing Professional Development (CPD) or insight on the part of Mrs Strafford, so the Committee could not be reassured that her conduct would not be repeated. This was in circumstances where Mrs Strafford has continued not to engage with the GDC in relation to these proceedings.

36. Furthermore, Miss Curzon submitted that this case engages the public interest given the finding of dishonesty, the absence of any meaningful remediation and in circumstances where Mrs Strafford continues not to engage with the GDC.

37. Miss Curzon invited the Committee to have regard to the mitigating and aggravating features in this case. She submitted that the most appropriate and proportionate sanction in the circumstances of this case would be that of erasure. She submitted that any sanction less than erasure would not be sufficient to protect the public and the wider public interest. Miss Curzon referred the Committee to the relevant sections of the GDC's Guidance during the course of her submissions.

Decision on misconduct

38. The Committee has considered the findings against Mrs Strafford. It has found proved that on 5 September 2024 at around 5pm Mrs Strafford removed approximately £240 from the safe at the Practice, when she knew that she did not have permission to do so. The Committee found her conduct was dishonest.

39. Further, from 29 October 2024 until at least 02 December 2024, Mrs Strafford failed to co-operate with the GDC's investigation into her fitness to practise from 29 October 2024 until at least 02 December 2024.

40. The Committee considered that Mrs Strafford's dishonest conduct fell far short of the standards reasonably expected of a dental professional. It was a considerable sum of money she stole from her employer. Further, as set out in its findings of fact, the Committee had regard to the CCTV footage which showed that Mrs Strafford accessed the safe twice to remove money belonging to the Practice. In the Committee's judgement, the conduct was pre-meditated and was not a momentary lapse of judgement. Further, at the time of the events in question Mrs Strafford would have known the code to the Practice's Safe as part of her role as a member of the management team at the Practice. She was therefore in a position of some responsibility at the Practice. The Committee considered that Mrs Strafford's dishonest conduct amounted to an abuse of her position

of trust and would be considered by her fellow practitioners and reasonable, informed members of the public, to be deplorable.

41. In addition, the Committee takes a serious view of Mrs Strafford's failure to co-operate with the GDC in relation to its investigation regarding her fitness to practise over a period of about a month. In the Committee's view, Mrs Strafford's failure to engage with the GDC inhibited the GDC's ability to discharge properly its overarching regulatory responsibility to regulate the profession in an effective manner and was liable to undermine the public's trust and confidence in the profession and in the regulatory process.

42. In its deliberations the Committee has had regard to the following paragraphs of the GDC's *Standards for the Dental Team* (September 2013) in place at the time of the facts that it has found proved. These paragraphs state that as a dental care professional:

1.3 *You must be honest and act with integrity.*

9.1 *You must ensure that your conduct, both at work and in your personal life, justifies patients' trust in you and the public's trust in the dental profession.*

9.4 *You must co-operate with any relevant formal or informal inquiry and give full and truthful information.*

9.4.1 *If you receive a letter from the GDC in connection with concerns about your fitness to practise, you must respond fully within the time specified in the letter.*

43. Taking all these factors into account, the Committee finds that the facts found proved amount to misconduct.

Decision on impairment

44. The Committee next considered whether Mrs Strafford's fitness to practise is currently impaired by reason of her misconduct. In doing so, it had regard to the over-arching objective of the GDC, which is: the protection, promotion and maintenance of the health, safety, and well-being of the public; the promotion and maintenance of public confidence in the dental profession; and the promotion and maintenance of proper professional standards and conduct for the members of the dental profession.

45. The Committee considered that dishonest conduct is attitudinal in nature and is unlikely, but not impossible, to be capable of being remedied. It further considered that Mrs Strafford's failure to co-operate with the GDC raises concerns about her attitude towards her regulator and her professional responsibilities. In respect of the dishonesty, the Committee bore in mind, in her favour, both that Mrs Strafford has no previous fitness to practise history and the notes of the 'Disciplinary Summary Sheet' written on or around 12 September 2024 (exhibited by Person A). This records that Mrs Strafford '*admitted to the theft without further need to view the evidence. She expressed regret for her actions and indicated that she did not want to lose her job, offering to repay the stolen funds.*' However, there is no evidence that Mrs Strafford has repaid any of the sum of approximately £240. Mrs Strafford has chosen not to attend this hearing. Her last known contact with the GDC was by email dated 28 October 2024. The Committee has no current evidence about Mrs Strafford's personal circumstances, including any evidence about her circumstances when she removed the sum of approximately £240 from the safe. Mrs Strafford has not provided any documentary evidence for the Committee to consider. There is no evidence before the Committee that she has made any attempts to address her conduct, to reflect on it and/or to remediate it. There is a clear lack of evidence of any insight.

46. In the absence of any evidence of remediation and the concern regarding Mrs Strafford's insight, the Committee concluded that there is a risk of repetition in relation to the misconduct identified. The Committee cannot be satisfied that Mrs Strafford's conduct is highly unlikely to be repeated. The Committee considered that a finding of current impairment on the grounds of misconduct is required on public protection grounds.

47. The Committee also determined that a finding of current impairment in respect of Mrs Strafford's misconduct is in the wider public interest. It considered that a reasonable and informed member of the public would be alarmed if a finding of impairment were not made in relation to a dental professional who stole money from their employer. This was compounded by Mrs Strafford's failure to engage with the GDC. The Committee therefore concluded that public confidence in the dental profession would be seriously undermined in the absence of such a finding. It also took into account the need to uphold proper professional standards of conduct and behaviour.

48. Accordingly, the Committee determined that Mrs Strafford's fitness to practise is currently impaired by reason of her misconduct.

Decision on sanction

49. Having determined that Mrs Strafford's fitness to practise is currently impaired by reason of her misconduct, the Committee considered what sanction, if any, to impose on her registration. It bore in mind that the purpose of a sanction is not to be punitive, although it may have that effect, but to protect the public and uphold the wider public interest. The Committee had regard to the GDC's Guidance. It applied the principle of proportionality, balancing the public interest with Mrs Strafford's own interests.

50. The Committee identified what it considered to be the mitigating and aggravating factors in this case. In mitigation, the Committee took account of the following:

- Previous good character.
- Owned up to stealing the money at the Practice's disciplinary meeting.
- Showed some remorse at the Practice's disciplinary meeting.

51. The Committee identified the following aggravating factors:

- Premeditated misconduct.
- Financial gain by the registrant.
- Abuse of trust and abuse of professional position.
- A willful disregard of the GDC's systems.
- Lack of insight.

52. The Committee considered the available sanctions, starting with the least restrictive. In light of the serious nature of Mrs Strafford's misconduct, the lack of any current evidence about her insight and remediation, as well as the identified risk of repetition, the Committee concluded that taking no action or issuing a reprimand would not be sufficient for the protection of the public, nor would it satisfy the wider public interest.

53. The Committee decided that a direction of conditional registration would not be sufficient to meet the public protection and public interest considerations engaged in this case. The Committee considered that conditions could not be formulated to deal with the risks that it has identified in light of Mrs Strafford's dishonest conduct. The Committee also considered that, even if conditions could be formulated, a direction of conditional registration would not be sufficient to declare and uphold

proper professional standards of conduct and behaviour because of the serious nature of Mrs Strafford's misconduct.

54. The Committee went on to consider whether to suspend Mrs Strafford's registration for a specified period. After careful consideration the Committee determined that suspension would not be sufficient to protect the public or meet the public interest considerations that it identified above.

55. The Committee considers that Mrs Strafford's dishonesty, which involved taking approximately £240 from her employer, is a serious matter. It also had regard to Mrs Strafford's failure to engage with the GDC in relation to its investigation regarding her fitness to practise.

56. The Committee also took account of paragraph 282 of the Guidance which deals with erasure. It identified the following factors as being relevant:

- The findings include serious departure(s) from the relevant professional standards.
- Where the findings include the abuse of a position of trust or violation of the rights of patients, colleagues, or other persons...
- Where the findings include serious dishonesty, particularly where persistent or covered up.
- Where there is a persistent lack of insight into the seriousness of actions or their consequences.
- A lesser sanction would be insufficient to meet the public interest.

57. There has been no acknowledgement from Mrs Strafford in relation to the seriousness of her actions or their potential consequences on the reputation of the dental profession in respect of her dishonesty. The Committee also determined that Mrs Strafford's misconduct in relation to her failure to co-operate with the GDC's investigation demonstrated a blatant disregard for the GDC and the systems for regulating dental professionals.

58. The Committee considered that a direction of suspended registration would not be likely to serve any useful purpose as, in light of its previous findings, especially of dishonesty, the Committee does not consider that a period of suspension will bring about the necessary rectification of Mrs Strafford's conduct and behaviour. The Committee considered that a period of suspended registration would not be sufficient to protect the public or the wider public interest.

59. The Committee determined that the only appropriate and proportionate sanction is that of erasure.

60. Unless Mrs Strafford exercises her right of appeal, her name will be erased from the Register for Dental Care Professionals, 28 days from the date that notice of this Committee's direction is deemed to have been served upon her.

61. The Committee now invites submissions from the GDC on an immediate order.

Decision on an immediate order

62. The interim order of suspension on Mrs Strafford's registration is hereby revoked.

62. The Committee went on to consider whether to impose an immediate order of suspension on Mrs Strafford's registration. In so doing, the Committee took account of Miss Curzon's application under Rule 22 and Section 30 of the Dentists Act 1984 (as amended) (the Act) that such an order should be imposed. She submitted that the ongoing risk of repetition identified by the Committee means that an immediate order is necessary for the protection of the public and to uphold public

confidence in the dental profession. Miss Curzon referred the Committee to paragraph 288 of the GDC's Guidance.

63. The Committee accepted the advice of the Legal Adviser, who drew its attention to the GDC's Guidance and outlined the statutory test for imposing immediate orders.

64. The Committee determined that the imposition of an immediate order of suspension on Mrs Strafford's registration is necessary for the protection of the public and is otherwise in the public interest.

65. In its substantive determination, the Committee has identified a risk of repetition of the misconduct in this case. In the circumstances, the Committee considers that it would be inconsistent not to impose an immediate order for the protection of the public.

66. The Committee is also satisfied that an immediate order is required in the wider public interest, in view of the gravity of the matters found proved, as identified in its reasons on finding current impairment. It considered that immediate action is necessary in this case to maintain public confidence in the dental profession and the regulatory process, and to uphold proper professional standards of conduct and behaviour.

67. The effect of the foregoing substantive determination and this order is that Mrs Strafford's registration will be suspended to cover any appeal period. Unless Mrs Strafford exercises her right of appeal, the substantive direction of erasure will take effect 28 days from the date of deemed service. Should Mrs Strafford exercise her right of appeal, this immediate order will remain in place until the resolution of the appeal.

68. That concludes this determination.