

ON PAPERS

Registrations Appeal Hearing CPD Appeal Hearing

23 March 2026

Name: Hafezi, Elham
Registration number: 289929
Case number: CAS- 213472-X4Z2K9

General Dental Council: Instructed by Megan Wolliner, 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 Mrs Hafezi 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 Mrs Hafezi 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 Mrs Hafezi had made no such request.
4. Notification of this appeal was sent to Mrs Hafezi by Recorded Delivery and secure email on 20 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. Mrs Hafezi 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 1 August 2020 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:

Mrs Hafezi first registered with the General Dental Council (“the Council”) as a dental nurse on 23 July 2020. Therefore, in accordance with Rule 1 as set out above, Mrs Hafezi’s current CPD cycle began on 1 August 2020 and will end on 31 July 2025. 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 Mrs Hafezi’s CPD cycle for the period 1 August 2020 to 31 July 2025.

On 22 May 2025, the Council sent an email reminder to Mrs Hafezi’s registered email address. This reminder, notified Mrs Hafezi that her CPD cycle was coming to an end and reminded her that she was required to submit her End of Cycle (‘EOC’) CPD statement, detailing how many CPD hours she had completed during that CPD cycle, by 28 August 2025. Mrs Hafezi was advised that if she did not submit a compliant statement before the deadline, her registration may be put at risk. Mrs Hafezi was informed that as she was in her final CPD year of her CPD cycle she could request a 56- day period of grace in order to be compliant, if there was good reason. Mrs Hafezi was told she would need to apply for a grace period by 31 July 2025.

On 10 June 2025, the Council also sent Mrs Hafezi 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. Mrs Hafezi was also reminded in this notice that she was required to submit her CPD statement by 28 August 2025. It was also stated that Mrs Hafezi would need to have completed at least 10 hours of CPD over the last two years. The letter explained that Mrs Hafezi was entitled to apply for a grace period of 56 days to enable her to complete her outstanding CPD. Mrs Hafezi was reminded that the deadline to apply for the grace period was 31 July 2025.

On 12 June 2024, 7 July 2024, 18 July 2024 and 5 August 2024 the Council sent further email reminders to Mrs Hafezi’s registered email address, notifying her that her 2023-2024 CPD cycle year was coming to an end and reminding her to submit her CPD statement, detailing how many CPD hours she had completed during that year, by 28 August 2024.

Between 12 August 2024 and 28 August 2024, the Council sent three text message reminders to Mrs Hafezi’s registered mobile number requesting that she submit her 2023-2024 CPD annual statement by 28 August 2025.

On 12 August 2025, 21 August 2025 and 28 August 2025, the Council sent three SMS reminders regarding the submission of her EOC CPD statement to Mrs Hafezi’s registered mobile number.

Rule 6 notice

On 25 September 2024, the Council sent a notice under Rule 6 to Mrs Hafezi by recorded delivery to her registered address. The notice stated that, although Mrs Hafezi had submitted a CPD statement to the Council, she had not declared enough hours to meet the CPD cycle requirement. The notice stated that between 1 August 2020 to 31 July 2025 Mrs Hafezi needed to complete a minimum of 50 verifiable hours of CPD.

The notice stated that if Mrs Hafezi wished to retain her registration, she should submit her CPD record including any documentary evidence to the Registrar by 23 October 2025 in order to demonstrate that she had met the requirement.

Correspondence with Mrs Hafezi

On 17 October 2025, the Council received a letter, by post, from Mrs Hafezi, in which she set out that whilst she had completed more CPD hours than the minimum required, due to her moving house, she was no longer in possession of the supporting CPD certificates. Mrs Hafezi sincerely apologised for her predicament and requested that the Registrar consider her CPD record based on the professional development she had undertaken. Mrs Hafezi emphasised that she is committed to maintaining and enhancing her skills in accordance with GDC standards and continuing to uphold the highest professional standards. Accompanying this letter, Mrs Hafezi enclosed the following documents:

- a) Personal development plan
- b) Log of CPD activities from 12 March 2025 to 25 September 2025
- c) Certificates of completed activity.

Rule 8 notice

On 5 November 2025, the Council sent a Rule 8 notice to Mrs Hafezi's registered address by recorded delivery. This notice confirmed that Mrs Hafezi had failed to provide a compliant CPD record demonstrating that she had met the minimum requirement for the period 1 August 2020 to 31 July 2025, and that Ms Hafezi 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. The evidence provided by Mrs Hafezi demonstrated that she had completed 9 hours of verifiable CPD between 1 August 2020 and 31 July 2025, which was not enough to meet her CPD requirements to complete a minimum of 50 hours of verifiable CPD for this cycle. Mrs Hafezi was notified that unless an appeal was submitted, the Registrar's decision would take effect on 5 December 2025.

Notice of Appeal

On 6 November 2025, the Council received a Notice of Appeal ("NOA") via email from Mrs Hafezi writing to appeal the decision regarding her removal from the register for CPD non-compliance .

On 11 November 2025, Mrs Hafezi's CPD evidence was assessed by a Registration Operations Officer. Mrs Hafezi was deemed to be non-compliant for the CPD cycle 1 August 2020 to 31 July 2025 because she had only completed 9 hours of verifiable CPD, which is not enough to meet the Enhanced CPD requirements to submit 50 hours of verifiable CPD.

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

Within the NOA, Mrs Hafezi outlines her reasons for not meeting her CPD requirements. In summary, Mrs Hafezi states that she had completed her required CPD hours but sincerely apologised for not logging her activity on the Council's CPD platform. Mrs Hafezi explained that during 2020 and 2022 she unfortunately lost many of her professional records due to moving house and employment.

On 18 November 2025, Mrs Hafezi's additional CPD evidence was assessed by a Registration Operations Officer. Mrs Hafezi was deemed to be non-compliant for the CPD cycle 1 August 2020 – 31 July 2025 because she had only completed 9 hours of verifiable CPD, which is not enough to meet the Enhanced CPD requirements to submit a minimum of 50 hours of verifiable CPD.

The reasons Mrs Hafezi's CPD evidence was deemed to be non-compliant are as follows:-

- a) Mrs Hafezi was outstanding 41 verifiable CPD hours
- b) The five Agilio Annual Statements were not supported by the corresponding certificates.
- c) NHS Digital - Data Security Awareness (NHSD) certificate dated on 14 July 2023 does not contain aims, objectives, learning content, outcomes full & accurate.
- d) NHS Digital - Data Security Awareness certificate dated on 10 July 2023 does not contain, aims, objectives, learning content, outcomes full & accurate.
- e) NHS Digital - Data Security Awareness Survey certificate dated on 14 July 2023 does not contain aims, objectives, learning content, outcomes full & accurate.
- f) NHS Digital - Data Security Awareness Level 1 certificate dated on 10 July 2023 does not contain, aims, objectives, learning content, outcomes full & accurate.

Submissions

11. In its written submissions, the Council's position is that Mrs Hafezi failed to submit a compliant CPD record for the CPD cycle 1 August 2020 to 31 July 2025, as is required under Rule 2. Mrs Hafezi has failed to declare enough hours to meet the requirement to complete a minimum of 50 verifiable hours of CPD across the five-year CPD cycle. It was submitted by the Registrar that Mrs Hafezi was reminded on numerous occasions, via three different means of communication of the need to complete her CPD hours and of the requirements, as set out in detail above.
12. Mrs Hafezi submits that she has lost many of the CPD certificates due to moving property and changing her work place a number of times over the relevant period. The Registrar is sympathetic to Mrs Hafezi's personal circumstances. However, Registrant's must keep all evidence of verifiable CPD for the duration of the five-year CPD cycle, and for five years after the completed cycle as the GDC may request to see a Registrant's CPD record.
13. It is the Registrar's position that all registrants ought to be aware of the requirements for continued registration which includes ongoing compliance with the CPD requirements. The purpose of the CPD requirement is to ensure that GDC registrants are, at all times, appropriately educated and trained to provide safe care to the public. Compliance with CPD is mandatory for

all dental professionals and is a requirement for their continued registration. Completing CPD is not dependent, or linked, to employment.

14. It is open to Mrs Hafezi 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 Mrs Hafezi 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 Mrs Hafezi was required to undertake. The Committee was in agreement with the Registrar (and it is not in dispute on appeal) that Mrs Hafezi was required to complete at least 50 hours of verifiable CPD during her five-year CPD cycle. She is short of 41 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 2025.
17. The Committee was satisfied that Mrs Hafezi had not complied with this requirement.
18. The Committee has taken full account of the reasons provided by Mrs Hafezi as to why she hasn't complied with the necessary hours. However, it noted the number of reminders that were sent by both email and text to Mrs Hafezi by the GDC. The Committee determined that it was her responsibility to be familiar with the CPD requirements. Having carefully considered Mrs Hafezi's 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. She had ample opportunities, and as of today, Mrs Hafezi had only provided evidence of having completed nine hours of verifiable CPD in the requisite period. The Committee is satisfied that Mrs Hafezi is non-compliant with her CPD requirements.
19. The Committee was satisfied that the GDC has complied with the 2017 Rules in dealing with Mrs Hafezi's CPD requirements including the serving of the statutory notices on her.
20. The Committee also balanced the interests of Mrs Hafezi 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 Mrs Hafezi 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 Mrs Hafezi in writing.
23. That concludes this determination.