

**ON PAPERS
PRIVATE HEARING**

**Registrations Appeal Hearing
CPD Appeal Hearing**

20 August 2026

Name: ASSARIAN, Sara

Registration number: 273358

Case number: CAS-215602-D8F7G3

General Dental Council: Represented by Amelia Hubbard, ILAS

Registrant: Unrepresented

Outcome: Appeal dismissed

Committee members: John Vellacott (Chair, lay member)
Alan McCrum (Lay member)
Annika Hindocha (Dentist member)

Legal adviser: Mike Bell

Committee Secretary: Sara Page

At this hearing the Committee made a determination that includes some private information. That information shall be omitted from the restricted version of this determination and the document marked to show where private material is removed.

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 Assarian 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 2A 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 matters

Application for the hearing to be held partly in private

3. At the beginning of the hearing, the Committee considered an application under Rule 14(1) of the Appeal Rules that that this hearing be held partly in private where reference is made to Mrs Assarian's private and family life.
4. The Committee heard and accepted the advice of the Legal Adviser in this regard. The Committee bore in mind that, as a starting point, hearings should be conducted in public session. However, having regard to the information before it, the Committee was satisfied that the personal interests of Mrs Assarian outweighed the public interest in this case.
5. The Committee therefore determined that the hearing should be held in private when discussing matters relating to Mrs Assarian's private and family life, and directed that two versions of the determination be made available, with appropriate redactions made to the restricted version that is made available to the public upon request.

Decision to conduct the appeal in the absence of Mrs Assarian and on the papers

6. 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, including the email from Mrs Assarian dated 1 August 2026, the Committee was satisfied that Mrs Assarian had made no such request.
7. Notification of this appeal was sent to Mrs Assarian by Recorded Delivery and secure email on 18 June 2026 in accordance with Rule 5 of the Registration Appeal Rules.
8. The Committee was satisfied that it was appropriate to consider today's appeal in the absence of either party and on the papers.

Decision and reasons on the appeal**Background**

9. The General Dental Council (Continuing Professional Development) (Dentists and Dental Care Professionals) Rules 2017 ('the CPD Rules') set out the CPD requirements placed on dentist registrants as of 1 January 2018, and the steps that the GDC shall take in respect of registrants' compliance and non-compliance with those requirements.
10. The 2017 Rules came into force on 1 January 2018 and took effect in respect of dentists on the same date.
11. In accordance with Rule 1, a 'CPD cycle' means, in respect of a dentist, a period of five years beginning on 1 January following the date the dentist is first registered and each subsequent period of five years. A 'CPD year' means, in respect of a dentist, a period of 12 months beginning on 1 January in any calendar year.
12. Mrs Assarian appealed against the Registrar's decision that her CPD is non-compliant because she had failed to meet the minimum requirement for the period 1 January 2024 – 31 December 2025.

Summary

13. The GDC's case in support of its decision was summarised as follows:
14. Mrs Assarian first registered with the GDC as a dentist on 21 September 2017. Therefore, in accordance with Rule 1 as set out above, Mrs Assarian's current CPD cycle began on 1 January 2023 and will end on 31 December 2027.
15. On 30 October 2025, the GDC sent an email reminder to Mrs Assarian's registered email address notifying her that her 2025 CPD cycle 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 January 2026. The email also reminded Mrs Assarian of the need to complete a minimum of 10 hours of CPD during each period of two consecutive years, including any two-year period spanning over more than one CPD cycle. Mrs Assarian was warned that if she failed to submit his CPD statement by this date her registration may be put at risk.
16. On 10 November 2025, the GDC sent Mrs Assarian 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 submit their CPD statement. Mrs Assarian was also reminded in this notice that she was required to submit her CPD statement by 28 January 2026. This letter also reminded Mrs Assarian of the need to complete a minimum of ten hours of CPD during each period of two consecutive years.
17. Between 26 November 2025 and 28 January 2026, the GDC sent numerous reminders to Mrs Assarian, via various communication methods, regarding her CPD requirements.

Rule 6 notice

18. On 20 February 2026, the GDC sent Mrs Assarian a notice under Rule 6 of the 2017 Rules to her registered address by recorded delivery. Mrs Assarian was informed that by not complying with her CPD requirements, her registration may be at risk. Mrs Assarian was informed that she had previously submitted a CPD statement for 2024 detailing two verifiable CPD hours and then submitted a statement for 2025 with three verifiable CPD hours. Mrs Assarian was informed that she now needed to submit a compliant CPD record covering 1 January 2024 to 31 December 2025 by the deadline of 20 March 2026. In addition, Mrs Assarian was informed that she now needed to submit her CPD record, including her Personal Development Plan (“PDP”), CPD log and evidence of completed CPD, in order to demonstrate her compliance with the CPD requirements. Mrs Assarian was warned that if the GDC did not receive a response to the notice or if her response was unsatisfactory, she may be erased from the dentists register. Mrs Assarian was also asked to inform the GDC if there were any reasons or exceptional circumstances, together with supporting evidence, that had meant she was unable to submit a compliant statement for the relevant period.
19. On 12 March 2026, the GDC received a letter from Mrs Assarian along with her CPD evidence via post. The letter sets out the following:
 - a) [PRIVATE].
 - b) Had misunderstood the deadline and believed she had until the end of January 2026 to complete the remaining CPD hours. Mrs Assarian apologises for this misunderstanding and takes full responsibility for the oversight.
 - c) Mrs Assarian understands that she is short of five CPD hours and says she is fully committed to rectifying this situation as soon as possible and has already identified several online CPD courses and is in the process of completing them. Mrs Assarian says, if permitted, she would be willing to complete additional CPD courses to demonstrate her commitment to meeting her professional obligations.
 - d) Mrs Assarian explains that she takes her continuing professional development seriously and this is evidenced by her completing postgraduate diplomas in Restorative Dentistry and Endodontics in 2022 and 2023, investing significant time, effort and financial resources to further develop her professional knowledge.
 - e) Mrs Assarian also states that she had mistakenly entered reduced hours in 2023 and 2024 and explains that for 2023 she had completed 52 CPD hours rather than the 49 hours entered, and for 2024 she had completed 3 CPD hours rather than the 2 hours entered.
 - f) Mrs Assarian states that this is the first time, since registering, where there has been an issue with her CPD hours and that she had contacted the CPD department on 23 January 2026 to explain herself, as she thought there was still time to address the matter.
 - g) Lastly, Mrs Assarian says that she understands the importance of CPD in maintaining safe and high standards of patient care and that she deeply

regrets the mistake and requests an opportunity to rectify the issue whilst remaining on the register.

20. On 17 March 2026, the GDC sent an email to Mrs Assarian to confirm her CPD records and exceptional circumstances were being reviewed and asked Mrs Assarian to provide any evidence in relation to her absence from work, including travel information, and to submit any evidence by 27 March 2026.
21. On 24 March 2026, the GDC received an email from Mrs Assarian attaching her indemnity documents and letter from her practice manager indicating the dates of her [PRIVATE] leave, and her travel documents.

Rule 8 notice

22. On 1 April 2026, the GDC sent a Rule 8 Notice to Mrs Assarian's registered address by recorded delivery. This notice confirmed that Mrs Assarian's evidence demonstrated completion of three hours of verifiable CPD between 1 January 2024 – 31 December 2024 and completion of three hours of verifiable CPD between 1 January 2025 – 31 December 2025. This was not sufficient to meet her CPD requirements to complete a minimum of ten hours of verifiable CPD for every two consecutive CPD year period. Her CPD was deficient as:
 - a) She was outstanding four verifiable CPD hours;
 - b) 7x Aspire Dental Academy Certificates are dated 2023 and are outside the requested cycle dates; and,
 - c) FOFATO – CPR & Medical Emergency Training Certificate – dated 30 January 2023 is outside the requested cycle dates.
23. Further, the letter also explained that Mrs Assarian's evidence, namely her letter dated 12 March 2026 and the evidence submitted on 24 March 2026, and that the GDC's Guidance on the Registrar's Discretion to erase for CPD Non-compliance was applied, and the following factors identified:
 - *The events you have described were not exceptional personal circumstances beyond your control;*
 - *The CPD you have completed before/since the timeframe under consideration is not relevant;*
 - *If you are registered with the GDC, you must continue to do CPD even if you are not currently working for any reason [PRIVATE]. If you wish to remain registered, you will need to continue to meet your CPD requirements during your leave period. This is because CPD is a legal requirement of registration; and,*
 - [PRIVATE].
24. As a result of Mrs Assarian's failure to provide a compliant CPD record, the Registrar had made the decision to remove her name from the dentists register for non-compliance with the 2017 Rules. Mrs Assarian was notified that unless an appeal was submitted, the Registrar's decision would take effect on 1 May 2026.

Notice of Appeal (NOA)

25. On 27 April 2026, the GDC received an email from Mrs Assarian attaching a Notice of Appeal (“NOA”) in which she confirmed that she wished to appeal the decision to remove her from the register. Mrs Assarian also submitted evidence in support of her appeal.
26. On 28 April 2026, Mrs Assarian’s NOA was reviewed by the Council’s Operations Officer. Mrs Assarian was deemed to be non-compliant with her CPD requirements because:
- *The registrant is 4 verifiable CPD hours outstanding*
 - *We are not able to accept FOFA certificate dated 2023 as it is out of cycle for 2024-2025*
 - *We are not able to accept 29x Agilio Certificates dated 2026 as they are out of cycle for 2024-2025*
 - *We are not able to accept Southern Medical Training Certificate dated 2026 as it is out of cycle for 2024-2025*
 - *We are not able to accept 7x Aspire Certificates as they are out of cycle for 2024-2025.*
27. This assessment found that Mrs Assarian had demonstrated that she had completed six hours of verifiable CPD for the period 1 January 2024 – 31 December 2025. Mrs Assarian was therefore required to provide a further four hours of CPD evidence for this period.

Further correspondence with the GDC

28. On 1 August 2026, the Dental Professionals Hearing Service (DPHS) received an email from Mrs Assarian attaching further documents relating to her CPD cycle. Within the email, Mrs Assarian explains that her CPD cycle history does not appear to be up to date as it shows she has 20 verifiable outstanding CPD hours, when she says she has completed 100 hours and her outstanding balance should therefore be zero. Mrs Assarian asks for the issue to be looked into as she is worried it may influence the Committee’s assessment.
29. On 4 August 2026, DPHS received a voicemail message from Mrs Assarian in which she expressed how she considers her CPD history is not accurate as she says she has completed 100 verifiable CPD hours, which she had until the end of 2027 to complete. Mrs Assarian asks if she can send the remaining CPD certificates and updated CPD cycle and asks for advice on this.
30. On 5 August 2026, Mrs Assarian’s correspondence and CPD documents were assessed by the Council’s Operations Officer. Mrs Assarian was deemed to be non-compliant with her CPD requirements as she has only completed six verifiable CPD hours which is not enough to meet the Enhanced CPD requirements to submit ten hours of verifiable CPD hours over two consecutive years between 1 January 2024 to 31 December 2025.
31. On 5 August 2026, DPHS subsequently received an email from Mrs Assarian attaching additional CPD evidence.
32. On 11 August 2026, Mrs Assarian’s additional CPD documents were assessed by the Council’s Operations Officer. Mrs Assarian was deemed to be non-compliant with her CPD requirements as she only completed six verifiable CPD hours which is not enough to meet the Enhanced CPD requirements to submit ten hours of verifiable CPD hours over two

consecutive years between 1 January 2024 to 31 December 2025. Mrs Assarian therefore has four hours of verifiable CPD outstanding.

Submissions

33. In its written submissions, the GDC submitted that Mrs Assarian is non-compliant with her CPD requirements because she has failed to demonstrate that she has completed the minimum requirement to undertake ten hours of verifiable CPD during the period 1 January 2024 – 31 December 2025.
34. The GDC noted that Mrs Assarian has provided CPD documentation with her NOA for CPD completed outside of the period 1 January 2024 – 31 December 2025. However, the CPD undertaken outside of the relevant period cannot be counted. Only CPD undertaken between 1 January 2024 – 31 December 2025 can be considered by the Registrar when assessing compliance under Rule 2(5) of the 2017 Rules which requires a minimum of 10 hours of CPD to be undertaken in each two-year period.
35. The GDC acknowledged that Mrs Assarian experienced difficulties in her personal life but as per the GDC's Guidance on the Registrar's Discretion to Erase for CPD non-compliance, **[PRIVATE]** is not an exceptional circumstance in and of itself.
36. The GDC also acknowledged the steps Mrs Assarian stated she had taken to ensure compliance with her CPD in the future. However, the Council respectfully submits that Mrs Assarian was sent reminders as early as 30 October 2025 drawing her attention to the requirement that dentists must complete a minimum of ten hours of CPD in each two-year period.
37. It is noted that Mrs Assarian says that she would have asked for a grace period if she had realised the deadline for completing her CPD hours was 31 December 2025. The GDC submitted that Mrs Assarian was not entitled to a grace period as she is not in the last year of her CPD cycle, as per Rule 9.
38. The GDC is therefore of the view that Mrs Assarian had completed six verifiable CPD hours between The GDC is therefore of the view 2025 and has a shortfall of four hours. Therefore, Mrs Assarian failed to meet the requirement that dentists complete a minimum of ten verifiable CPD hours in each two-year period as per Rule 2(5) of the 2017 Rules.
39. In Mrs Assarian's NOA, she submitted the following:
 - a) Mrs Assarian notes that her current CPD cycle commenced in January 2023 and is due to end in December 2027 and that she is required to complete 100 hours of verifiable CPD over a five-year cycle, as well as a minimum of ten hours of verifiable CPD over each period of two consecutive years.
 - b) On 26 January 2026, Mrs Assarian submitted her CPD statement for the period ending 31 December 2025 and subsequently received notification, under Rule 6, confirming that her submission was non-compliant as she had not met the minimum requirement of ten hours of verifiable CPD over the relevant two-year period as she had completed six hours in 2024 and 2025.

- c) Mrs Assarian explains that she was asked to submit her CPD record and any supporting evidence to demonstrate compliance with the requirements and she wrote to the GDC on 24 March 2026 with the information. However, she received a Rule 8 notice on 1 April 2026.
- d) Mrs Assarian acknowledges that she did not meet the requirements and takes full responsibility for the failure and sincerely apologises.
- e) Mrs Assarian says that shortfall arose due to a combination of personal circumstances and a misunderstanding on her part. [PRIVATE] she experienced challenges in balancing her personal responsibilities with maintaining her CPD requirements.
- f) Further, Mrs Assarian explains that she spent a period of time in Iran, where she had limited and inconsistent access to the internet, which restricted her ability to complete online CPD activities. However, Mrs Assarian does not rely on these circumstances as an excuse as she accepts her misunderstanding related to the deadline for completing her CPD hours, as she thought she had until 28 January 2026 to complete outstanding CPD and it is the reason why she completed her remaining four hours in January.
- g) Mrs Assarian says that if she had realised the deadline was 31 December 2025 she would have contacted the GDC earlier and asked for a grace period. Mrs Assarian explains that she never sought to avoid completing her CPD hours and that she proactively contacted the GDC in January to seek clarification. Mrs Assarian suggests this demonstrates her honesty and transparency.
- h) Mrs Assarian states that she takes her professional obligations seriously and has consistently engaged with CPD throughout her career and has never previously fallen short.
- i) Mrs Assarian explains that she has taken immediate steps to address the deficit upon becoming aware of the issue and has continued to undertake CPD training. Her CPD log demonstrates her ongoing commitment to remaining up to date and competent in her practice.
- j) Mrs Assarian refers to the postgraduate training she completed in 2022 and 2023 which shows her investment in time and financial resources to ensure she provides a high standard of care to her patients, and that the current lapse is an isolated event related to a misunderstanding of the deadline rather than a lack of commitment.
- k) Mrs Assarian suggests that her removal from the register would have a significant impact on her patients and the dental practice she works at, as she is a committed and reliable member of the team who is responsible for the ongoing care and treatment of a large number of patients, many of whom are mid-treatment and her absence would result in delays to their care, extended waiting times and disruption to treatment outcomes.
- l) Further, her removal would place considerable pressure on her colleagues as they would have to cover her workload at short notice and this would

likely result in increased waiting lists, reduced access to care for patients and operational challenges for the practice.

- m) Mrs Assarian provides a letter from her Practice Principal setting out the impact of her erasure and further apologises for her oversight with the CPD requirements.
- n) Mrs Assarian submits that, whilst there is no power to waive the provisions and issue a further Rule 8 notice prior to an appeal, the decision to erase a registrant is a discretionary one. Mrs Assarian submits that under section 34A(2) of the Dentists Act 1984, the Registrar may erase a person from the register if they have failed to comply with the CPD requirements and that there is nothing in the Act or Rules that limits that discretion and thus the Committee has a broad discretion to apply, as it sees fit.
- o) Mrs Assarian invites the Committee to exercise its discretion and allow the appeal and quash the decision to erase her name from the register in light of the extenuating circumstances.

Committee's decision and reasons on appeal

- 40. 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 Assarian in her NOA. It heard and accepted the advice of the Legal Adviser.
- 41. The Committee noted that Mrs Assarian has completed six hours of verifiable CPD between 1 January 2024 – 31 December 2025, leaving a shortfall of four hours. The Committee acknowledged the explanation provided by Mrs Assarian regarding her personal circumstances during the relevant cycle, including her absence from work to travel [PRIVATE], but she has not provided any evidence of circumstances that were exceptional that these had prevented her from complying with her CPD requirements.
- 42. Accordingly, the appeal is dismissed. The Committee wished to remind Mrs Assarian 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.
- 43. This will be confirmed to Mrs Assarian in writing.
- 44. That concludes this determination.