

ON PAPERS

Registrations Appeal Hearing CPD Appeal Hearing

2 April 2026

Name: Pycroft, Farrah
Registration number: 247350
Case number: CAS- 213906-W0W3G5

General Dental Council: Instructed by Megan Wolliner, ILAS

Registrant: Unrepresented

Outcome: Appeal dismissed

Committee members: Carson Black (Chair, Dentist member)
Victoria Buller (Lay member)
Joanne Brindley (DCP member)

Legal adviser: Alastair McFarlane

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 Pycroft from the Register for apparent non-compliance with the statutory Continuing Professional Development (CPD) requirements. The meeting 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 meeting was conducted remotely via Microsoft Teams in line with current GDC practice. Neither party was present at today's meeting, 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 Pycroft 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 Pycroft had made no such request.
4. Notification of this appeal was sent to Miss Pycroft by Recorded Delivery and secure email on 27 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 Pycroft 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 to 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 Pycroft first registered with the General Dental Council (“the Council”) as a dental care professional, with the title Dental Nurse, on 14 November 2013. Therefore, in accordance with Rule 1 as set out above, Miss Pycroft’s current CPD cycle began on 1 August 2024 and will end on 31 July 2029.

On 22 May 2025, the Council sent an email reminder to Miss Pycroft’s registered email address. This reminder, notified Miss Pycroft that her 2024-2025 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 August 2025. The email also reminded Miss Pycroft 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. Miss Pycroft was notified that if she failed to submit a compliant CPD statement before the deadline, her registration may be put at risk.

On 10 June 2025, the Council sent Miss Pycroft an Annual Renewal Notice 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. Miss Pycroft was also reminded in this notice that she was required to submit her CPD statement by 28 August 2025. It was again stated that Miss Pycroft would need to have completed at least 10 hours of CPD for every two consecutive CPD years of registration to ensure she is compliant with her CPD requirements.

On 12 June 2025, 7 July 2025, 18 July 2025 and 5 August 2025 the Council sent further email reminders to Miss Pycroft’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 2025.

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

Rule 6 notice

On 25 September 2025, the Council sent Miss Pycroft a notice under Rule 6 of the 2017 Rules by recorded delivery to her registered address. The notice stated that, although Miss Pycroft 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. Miss Pycroft was informed that she had previously submitted a CPD statement for 2023-2024 detailing five verifiable hours and a statement for 2024-2025 with four verifiable hours. Miss Pycroft was informed that she needed to submit a compliant CPD record covering 1 August 2023 to 31 July 2025 by the deadline of 23 October 2025. Miss Pycroft was informed that if the Council did not receive a response to the notice or if her response was unsatisfactory, she may be erased from the dental care professionals register. Miss Pycroft was also asked to inform the Council if there were any reasons or exceptional circumstances that had meant she was unable to submit a compliant statement for the relevant period.

On 21 October 2025, the Council received a letter from Miss Pycroft. In the letter Miss Pycroft apologises for failing to comply with her CPD requirement and explains that she was under the impression that she was only required to complete 50 hours over five years.

Rule 8 notice

On 5 November 2025, the Council sent a Rule 8 notice to Miss Pycroft's registered address by recorded delivery. This notice confirmed that Miss Pycroft 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. The letter explained that Miss Pycroft completed zero hours of verifiable CPD between 1 August 2023 – 31 July 2024 and zero hours of verifiable CPD between 1 August 2024 – 31 July 2025. This was not sufficient to meet the CPD requirements to complete a minimum of 10 hours of verifiable CPD for every two consecutive CPD year periods. Miss Pycroft was informed that her CPD was deficient because:

- She had 10 verifiable CPD hours outstanding
- The Dental Life Support and Medical Emergencies certificate dated 23 May 2024 does not contain aims or objectives.
- The Dental Life Support and Medical Emergencies certificate dated 17 July 2025 does not contain aims or objectives
- 43 certificates provided are dated between 01 August 2025 - 31 July 2026 and are therefore outside the CPD cycle dates requested.

The letter referred to Miss Pycroft's 21 October 2025 letter but noted that Miss Pycroft 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 Miss Pycroft's name from the dental care professionals register for non-compliance with the 2017 Rules. Miss Pycroft was notified that unless an appeal was submitted, the Registrar's decision would take effect on 5 December 2025.

Notice of Appeal

On 28 November 2025, the Council received a Notice of Appeal ('NOA') via email from Miss Pycroft which confirmed that she wished to appeal against the decision to remove her from the dental care professionals register.

Within her NOA, Miss Pycroft explained that she understood the Registrar's decision to remove her from the Register, and that she understood the seriousness of the matter. Further, she indicated that she understood that the Dental Life Support and Medical Emergencies certificates do not contain aims or objectives but indicated that this was due to fault by the provider, and that she and her colleagues thought these courses were verifiable and had submitted them for the relevant cycle period.

a. Miss Pycroft further explained that her previous workplace was "a very toxic workplace to work" **[IN PRIVATE]**.

b. **[IN PRIVATE]**.

Within her NOA, Miss Pycroft explained that in September 2023 she moved jobs and that this remained her current place of work. Miss Pycroft explained that she now works with a supportive team [IN PRIVATE]. Miss Pycroft admits that she had neglected her GDC requirements by not completing enough of her CPD hours. Miss Pycroft reiterated her misunderstanding that that she needed to complete the 50 hours of CPD over the 5-year cycle.

Miss Pycroft expressed that she was worried about the termination of her employment if she were to be removed from the GDC register. She explained that she was employed as a Head Dental Nurse, requiring that she work in Surgery, and that it would not be an option for her to do administrative duties while she sought restoration (and so her employer would need to hire someone else). Miss Pycroft referred to [IN PRIVATE] the rising cost of living and Christmas coming up (as at the date of her NOA) which made her very worried if she was to lose her job.

On 5 December 2025, Miss Pycroft's NOA and CPD evidence was reviewed by an Operations Officer. A copy of this assessment sets out why Miss Pycroft's CPD evidence remained non-compliant:

- a) Miss Pycroft had 10 verifiable CPD hours outstanding for the period 1 August 2023 – 31 July 2025.
- b) 43 Agilio Certificates are dated outside the requested cycle dates.
- c) 2 Dental Life support and medical emergencies certificates do not contain aims, objectives and learning outcomes.

Submissions

11. In its written submissions, the Council's position is that Miss Pycroft is non-compliant because she has failed to demonstrate that she has completed the minimum requirement to undertake 10 hours of verifiable CPD during the period 1 August 2023 to 31 July 2025, in accordance with Rule 2.
12. Miss Pycroft expresses that she was under the impression that she was only required to complete 50 verifiable hours over five years. However, Miss Pycroft 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.
13. The Council notes that Miss Pycroft has provided additional CPD documentation with her NOA for CPD completed outside of the relevant period, which therefore cannot be considered by the Registrar when assessing compliance.
14. The Council also notes that Miss Pycroft has provided CPD certificates which do not detail the aims, objectives and learning outcomes. As set out by Rule 2(6)(a)(i) of the 2017 Rules, any CPD undertaken by a practitioner is only to count towards the minimum number of hours if there is documentary evidence from the provider of the CPD which states, 'the subjects, learning content, aims, objectives and anticipated learning outcomes of the CPD and the date that the CPD was undertaken' which can be accepted by the Registrar when assessing compliance.
15. The Council is of the view that, as of 5 December 2025, Miss Pycroft had completed zero verifiable CPD hours between 1 August 2023 and 31 July 2025. Therefore, Miss Pycroft has failed to meet the requirement that dental care professionals complete a minimum of 10 verifiable CPD hours in each two-year period.

16. The Registrar acknowledges Miss Pycroft's challenging circumstances regarding her **[IN PRIVATE]** previous employment. However, the Registrar submits that Miss Pycroft had sufficient opportunities to complete the required CPD during each period of two consecutive years, and that she ought to be aware of the requirements for continued registration with the GDC, which includes ongoing compliance with the CPD requirements.
17. It is open to Miss Pycroft to apply to restore her registration at any time following this appeal.

Committee's decision

18. 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 Pycroft in her Notice of Appeal. It heard and accepted the advice of the Legal Adviser.
19. The Committee determined that Miss Pycroft has failed to demonstrate that she has completed the minimum requirement to undertake 10 hours of verifiable CPD during the period 1 August 2023 to 31 July 2025, in accordance with Rule 2. In addition, the Committee notes that she has provided 5.5 hours worth of CPD certificates, which falls in the relevant period. However, these do not detail the aims, objectives and learning outcomes. The Committee also bore in mind that it could postpone the meeting in order to obtain further information as to the CPD certificates but determined not to do so because even if they did count, they would not reach the required total of 10 hours. Therefore, they would not alter the outcome of her appeal.
20. The Committee was satisfied that Miss Pycroft had not complied with this requirement.
21. The Committee has taken full account of the difficult personal circumstances Miss Pycroft experienced. It noted the number of reminders that were sent by both email and text to Miss Pycroft. The Committee determined that it was her responsibility to be familiar with the CPD requirements. Having carefully considered Miss Pycroft'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. As of today, Miss Pycroft had fallen short of 10 verifiable hours, and that she had completed the verifiable CPD in the requisite period. The Committee is satisfied that Miss Pycroft was non-compliant with her CPD requirements.
22. The Committee was satisfied that the GDC has complied with the 2017 Rules in dealing with Miss Pycroft's CPD requirements including the serving of the statutory notices on her.
23. The Committee also balanced the interests of Miss Pycroft 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.
24. Accordingly, the appeal is dismissed. The Committee wished to remind Miss Pycroft 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 and provide the required annual CPD statement.
25. This will be confirmed to Miss Pycroft in writing.
26. That concludes this determination.

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