

## ON PAPERS

### Registrations Appeal Hearing CPD Appeal Hearing

23 March 2026

**Name:** O'DONOVAN, Chelsie

**Registration number:** 205892

**Case number:** CAS- 213477-S7F5X3

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**General Dental Council:** Instructed by Needa Bhatti, ILAS

**Registrant:** Unrepresented

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**Outcome:** Appeal dismissed

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**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 Miss O'Donovan 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 O'Donovan 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 O'Donovan had made no such request.
4. Notification of this appeal was sent to Miss O'Donovan by Recorded Delivery and secure email on 9 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 O'Donovan appealed against the Registrar's decision that she failed to provide a compliant CPD record demonstrating that she had met the minimum requirement for the period 1 August 2024 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 O'Donovan first registered with the General Dental Council ("the Council") as a dental nurse on 24 March 2011. Therefore, in accordance with Rule 1 as set out above, Miss O'Donovan's current CPD cycle began on 1 August 2020 and will end on 31 July 2025. The CPD period which has been assessed and the evidence for which has been deemed non-compliant, and which is the subject of this appeal, is Miss O'Donovan's CPD for the period 1 August 2024 to 31 July 2025.

On 22 May 2025, the Council sent an email reminder to Miss O'Donovan's registered email address. This email notified Miss O'Donovan that her 2024-2025 CPD 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 O'Donovan 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. It was also explained within this email, that a declaration would need to be made in the event that no CPD had been undertaken for 2024-2025 by adding '0' hours to the CPD record. Miss O'Donovan was warned that if she failed to submit her CPD statement by this date her registration may be put at risk.

On 10 June 2025, the Council sent Miss O'Donovan 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. Miss O'Donovan was also reminded in this notice that she was required to submit her CPD statement by 28 August 2025 and of the need to complete a minimum of 10 hours of CPD for every two consecutive CPD years of registration.

On 7 July 2025, the Council sent an email to Miss O'Donovan in which she was reminded that her Annual Renewal was due on or before 31 July 2025. It was noted that, although the Council had received her Annual Retention Fee, it was yet to receive her indemnity declaration. Miss O'Donovan was reminded within this email of the need to submit her CPD statement by 28 August 2025.

On 12 June 2025, 18 July 2025 and 5 August 2025 the Council sent further email reminders to Miss O'Donovan's registered email address, notifying her that her 2024-2025 CPD 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 2024 and 28 August 2024, the Council sent three text message reminders to Miss O'Donovan's registered mobile number requesting that she submit her 2023-2024 CPD annual statement by 28 August 2025.

On 12 August 2025 and 28 August 2025, the Council sent three SMS reminders regarding the submission of her CPD statement to Miss O'Donovan's registered mobile number.

### Rule 7 notice

On 25 September 2025, the Council sent Miss O'Donovan a notice under Rule 7 of the 2017 Rules to her registered address by recorded delivery. The notice stated that Miss O'Donovan had failed to submit a CPD statement for the year 1 August 2024 – 31 July 2025 by the deadline provided of 28 August 2025. The notice required Miss O'Donovan to submit her CPD statement by the deadline of 23 October 2025 either online or by completing and returning the enclosed statement. It also informed her that a CPD statement included submitting the CPD hours she had completed and also making her declarations and that if any of this information was missing her statement would not be deemed complete. The notice reminded Miss O'Donovan that if the Council did not receive her statement by 23 October 2025, she may be erased from the dental care professionals register.

Miss O'Donovan did not submit her annual statement by 23 October 2025.

### Rule 8 notice

On 5 November 2025, the Council sent a Rule 8 Notice to Miss O'Donovan's registered address by recorded delivery. This notice confirmed that Miss O'Donovan had failed to complete an annual CPD statement for the period 1 August 2024 – 31 July 2025 by the deadline of 23 October 2025 and that as a result, the Registrar had made the decision to remove her name from the dental care professionals register for non-compliance with the 2017 Rules. Miss O'Donovan was notified that unless an appeal was submitted, the Registrar's decision would take effect on 5 December 2025.

### Correspondence with Miss O'Donovan

On 6 November 2025 the Council received an email from Miss O'Donovan. The email stated that she had recently moved house and was abroad in the USA from 23 October 2025 for three weeks and therefore had not had a chance to complete her statement. She also stated that she would be appealing the matter on her return.

### Notice of Appeal

On 8 November 2025, the Council received a Notice of Appeal ('NOA') from Miss O'Donovan in which she confirmed that she wished to appeal the decision to remove her name from the register. The email stated the following:

"I have recently just got an email about my GDC and being removed as not clicked on hours and input. Please can I appeal this, I have moved address and thought I had updated this so not received any letters. Also just been married and just got back yesterday after being in America. I thought I had input all this so confused as to why this isn't showing or not in there. I don't know, however noticed I had emails in my spam from this. I am so sorry I didn't realise until now. Not sure and so confused as I done everything else not sure why this isn't on there or not showing. I think with being so busy with wedding, travel etc I must of missed this. Please can I appeal."

On 10 November 2025 the Council received a webform from Miss O'Donovan stating: "I need to edit my hours as I made a mistake and need to update my hours. I left an entry blank for the last few months".

On 11 November 2025 the Council replied to Miss O'Donovan to confirm that as a Notice 8 letter had been issued, it was not possible to amend her CPD hours

On 12 November 2025, the Council's Operations Officer completed a CPD Assessment Statement. It was determined that Miss O'Donovan was non-compliant with her CPD requirements as she had failed to submit an Annual CPD statement for the year 2024-2025 as required by the 2017 Rules, to reflect a minimum of 10 verifiable CPD hours for the years 1 August 2024 - 31 July 2025.

### **Submissions**

11. In its written submissions, the Council's position is that Miss O'Donovan's CPD is non-compliant because she failed to make an annual CPD statement for the year 2024-2025 by 28 August 2025 as required by Rule 4 of the 2017 Rules. Miss O'Donovan also failed to provide her annual CPD statement by the further deadline of 23 October 2025 as set out in her Rule 7 notice.
12. They submitted that her statement required Miss O'Donovan to confirm the number of hours of CPD undertaken within the CPD year 2024 to 2025, and if she had not undertaken any CPD in that CPD year, confirmation that no CPD had been undertaken. Miss O'Donovan would also have needed to have confirmed that she had kept a CPD record, that the CPD she had undertaken (where applicable) was relevant to her field of practice as well as declared the information in her statement was full and accurate.
13. Miss O'Donovan states in her NOA that she had moved address so may not have received the Council's correspondence and now provides this. Miss O'Donovan also states that she believes she had updated her address with the Council. The Council submits that it is a registrant's responsibility to inform the Council of any change of contact details. In addition, the Council's records confirm that the registrant first informed the Council of her change of address within her NOA email of 8 November 2025.
14. Miss O'Donovan also states that in addition to not receiving postal correspondence from the Council due to her change of address, the Council's email correspondence on this matter also may not have reached her as the emails were redirected to her spam email folder. In addition, she states that as she was busy with her personal affairs she did not realise, she had missed meeting her CPD requirements. The Council submits that Miss O'Donovan has been registered since 2011 and has been sent regular reminders in relation to her CPD requirements since her registration with the Council. In addition, the Council respectfully submits that all registrants should be aware of their CPD requirements and their obligations in this respect as the mandatory CPD requirements are an important part of the Council's regulatory system that protects the public and patients.
15. It is open to Miss O'Donovan to apply to restore her registration at any time following this appeal.

### **Committee's decision**

16. 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 O'Donovan. It heard and accepted the advice of the Legal Adviser.

17. The Committee determined that Miss O'Donovan had failed to make an annual CPD statement for the year 2024-2025 by 28 August 2025 as required by Rule 4 of the 2017 Rules. Miss O'Donovan also failed to provide this by the further deadline of 23 October 2025 as set out in her Rule 7 notice.
18. The Committee was satisfied that Miss O'Donovan had not complied with this requirement.
19. The Committee has taken full account of the difficult personal circumstances Miss O'Donovan experienced. It noted the number of reminders that were sent by both email and text to Miss O'Donovan. The Committee determined that it was her responsibility to be familiar with the CPD requirements. Having carefully considered Miss O'Donovan's personal circumstances and written submissions, 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 O'Donovan had failed to confirm in an annual CPD statement that she had completed the verifiable CPD in the requisite period. The Committee is satisfied that Miss O'Donovan was non-compliant with her CPD requirements.
20. The Committee was satisfied that the GDC has complied with the 2017 Rules in dealing with Miss O'Donovan's CPD requirements including the serving of the statutory notices on her.
21. The Committee also balanced the interests of Miss O'Donovan 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.
22. Accordingly, the appeal is dismissed. The Committee wished to remind Miss O'Donovan 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.
23. This will be confirmed to Miss O'Donovan in writing.
24. That concludes this determination.