

Hearing part-held in private

**Professional Conduct Committee
Review Hearing**

13 March 2026

Name: MURPHY, Christine
Registration number: 142440
Case number: CAS-206450-S0D8V1

General Dental Council: Christopher Saad of Counsel
Instructed by Georgina Mayles of IHLPS

Registrant: Present
Unrepresented

Outcome: Suspension extended (with a review)
Duration: 6 months

Committee members: Adrian Smith (Chair) (Lay)
Sulaman Anwar (Dentist)
Nicola Rice (DCP)

Legal adviser: Edward Hosking

Committee Secretary: Paul Carson

Miss Murphy,

1. This is a resumed hearing pursuant to section 36Q of the Dentists Act 1984. The hearing was part-held in private under Rule 53 of the General Dental Council (Fitness to Practise) Rules 2006 to protect your right to privacy in relation to historic matters which do not form part of the current proceedings.
2. On 22 August 2024, the Professional Conduct Committee (the 'PCC') found your fitness to practise as a dental nurse to be impaired by reason of misconduct and directed that your registration be suspended for a period of six months with a review.
3. The initial PCC summarised the background to the case as follows:

'This case arises from a self-referral to the GDC via an email dated on 2 August 2021. You informed the GDC of a conviction received on 5 February 2021, you were convicted at South-East London Magistrates' Court of a driving offence. During the course of its investigation into your self-referral, the GDC obtained a copy of your PNC record dated 28 August 2021 and also a copy of the Certified Memorandum of Conviction dated 18 April 2021. The GDC could find no evidence of you having informed it of this conviction until 2 August 2021.'

4. The initial PCC did not find your fitness to practise to be impaired by reason of your conviction given, among other factors, the passage of time since the conviction, the lack of any evidence of re-offending and your remorse and self-referral to the GDC. The initial PCC did however find your fitness to practise to be impaired by reason of misconduct for having failed to immediately inform the General Dental Council (GDC) that you were subject to the criminal proceedings, both at the point of being charged and when convicted. The initial PCC found that this failure to have immediately informed the GDC was dishonest, stating:

'...The Committee was satisfied that you knew, including after having made a DBS check, that you were under an obligation to immediately inform the GDC of being charged and convicted. The Committee inferred on the balance of probabilities that the likely reason for your non-disclosure of your conviction was because you thought your GDC registration would be at risk, in light of the nature of your re-offending and previous matters before various Health Committees...'

5. In finding your fitness to practise to be impaired by reason of misconduct, the initial PCC stated:

'The Committee was of the view that dishonesty is very difficult to remedy, although not impossible. In considering what steps you have taken to address your dishonesty, the Committee took into account the evidence it received including your oral evidence given at this hearing. The Committee notes that you have made a continued commitment to your profession. You state that you are up to date with your CPD and expressed a desire to return to dental nursing. However, the Committee has received little evidence of insight and remediation into your past behaviour. You stated that you would not repeat this type of conduct again but the Committee were informed of similar conduct being repeated, which went before a Health Committee in 2016.'

Taking all the evidence into account, the Committee was satisfied that given your lack of insight into your past conduct, a risk of repetition remains. Therefore, a finding of impairment in respect of public protection is appropriate and proportionate in the circumstances of this case.

The Committee next considered whether a finding of impairment is required in the public interest. It took into account its duty to maintain the public's confidence in the profession and to uphold proper standards. The public has a right to trust the accuracy of the GDC register. Taking these factors into account, the Committee determined that public confidence in the profession would be undermined if a finding of impairment were not made, given the serious nature of your dishonesty.'

6. In directing that your registration be suspended for a period of six months with a review, the initial PCC stated:

'The Committee is not satisfied that your conduct is fundamentally incompatible with your remaining a registered dental professional. You provided positive testimonials from your recent colleagues and employer relating to your competence and conduct as a dental nurse. There is a public interest in rehabilitation and the return to work of a dental nurse whose clinical competence has not been questioned. Suspension is the proportionate sanction in the Committee's judgement. A period of suspension would mark your misconduct and conviction and would allow you the opportunity to reflect further on your behaviour and its impact on public confidence in the profession.

Accordingly, the Committee directs that your registration be suspended for a period of six months. The period of suspension shall be reviewed prior to its expiry. The reviewing Committee may be assisted by your evidence of any further insight and remorse you have developed in respect of your offending and your misconduct. The reviewing Committee may also be assisted by:

- *Evidence of targeted CPD;*
- *Evidence of insight and the need to follow GDC principles and standards;*
- *Evidence of your understanding of the need to maintain the integrity of the GDC register.'*

7. On 6 February 2025, the PCC reviewed the suspension and determined that your fitness to practise continued to be impaired by reason of the misconduct found by the initial PCC. You were neither present nor represented at that hearing, explaining to the Committee that you were on a pre-booked holiday and consenting to the hearing proceeding in your absence. The February 2025 PCC noted that: *'There was no record before the Committee of any submissions or other engagement from Ms Murphy beyond her email confirming that she consents to the hearing proceeding in her absence'*.

8. In finding that your fitness to practise continued to be impaired, the February 2025 PCC stated of you:

'...She has not provided any of the information indicated by the initial PCC as being of potential relevance to this review hearing, such as evidence of targeted CPD and insight. She has not otherwise provided any reflection or remedial evidence whatsoever. In those circumstances, the Committee determined that her fitness to practise continues to be impaired by reason of misconduct. The Committee today is in no different a position to the initial PCC save that Ms Murphy now appears less engaged in the proceedings than she was at the initial hearing. In order for the Committee to be in a position to find that her fitness to practise is no longer being impaired, it would be necessary for Ms Murphy to fully engage in this regulatory process and to provide evidence of reflection, learning and remediation. This is not a case where her fitness to practise would cease to be impaired through the passage of time. She must actively engage and discharge her persuasive burden to demonstrate to the reviewing Committee that her fitness to practise is no longer impaired.'

9. The February 2025 PCC directed that the suspension of your registration be extended by a further period of 12 months with a review.

The resumed hearing 13 March 2026

10. The review hearing was originally scheduled to take place on 6 February 2026 but was adjourned until today to facilitate your attendance. It is the role of the Committee today to undertake the review directed by the February 2025 PCC.
11. Mr Saad, on behalf of the GDC, submitted that you have not met the recommendations indicated by the initial PCC. He submitted that your fitness to practise continues to be impaired and that the suspension of your registration should be extended by a further period of 12 months with a review.
12. You addressed the Committee and answered questions on your circumstances and remediation.
13. You stated that it had taken three years for the allegations to reach the initial PCC because of delays caused by the COVID-19 pandemic, during which time you had continued to work without incident.
14. You explained that you have worked as a dental nurse for 26 years and had developed in your career to provide support with sedation and implant work. You stated that you are a good dental nurse who had worked in the profession since leaving school and who is passionate about dental nursing. You referred the Committee to a three-day personal development course which you had completed in May 2025. You explained that you have not otherwise undertaken any Continuing Professional Development (CPD) activity as you are not currently working and there is a financial barrier to accessing courses which would otherwise be funded by an employer.
15. You asked the Committee to lift the suspension of your registration so that you can resume work as a dental nurse.

16. The Committee accepted the advice of the Legal Adviser on the review of the suspension.
17. The Committee first considered whether your fitness to practise continues to be impaired by reason of the misconduct found by the initial PCC. The Committee was pleased that you had attended the hearing today and found you to be frank and straightforward when addressing the Committee. However, the Committee was concerned that you still have not provided any written reflective statement on your misconduct, neither did you show in your oral submissions any understanding or meaningful reflection on that misconduct. You did not address the Committee on the dishonesty which had been found proved by the initial PCC. You did not discuss or reflect upon the GDC's standards and the importance of adhering to those standards. You also have not undertaken any CPD since being suspended by the initial PCC. The Committee rejected your explanation that cost was a barrier, as online CPD activities are widely available for free or at a low cost. The Committee noted that you had not attended the February 2025 PCC review hearing as you were on a pre-booked holiday, which would suggest that finances would not have been a complete barrier to undertaking at least some CPD activity.
18. Having regard to all the circumstances, the Committee determined that, whilst you are passionate about dental nursing and are keen to return to work, you have not yet demonstrated that you have remedied the misconduct found by the initial PCC. As stated by the February 2025 PCC: *"In order for the Committee to be in a position to find that her fitness to practise is no longer being impaired, it would be necessary for Ms Murphy to fully engage in this regulatory process and to provide evidence of reflection, learning and remediation. This is not a case where her fitness to practise would cease to be impaired through the passage of time. She must actively engage and discharge her persuasive burden to demonstrate to the reviewing Committee that her fitness to practise is no longer impaired."*
19. The Committee today is in no different a position to the initial and last reviewing PCCs. Whilst the Committee has had the benefit of your attendance, you are still to demonstrate insight, reflection and remediation. In the Committee's judgment, there therefore remains a risk of repetition of your misconduct.
20. Accordingly, the Committee determined that your fitness to practise continues to be impaired by reason of the misconduct found by the initial PCC.
21. The next consideration for the Committee was what action, if any, to take in respect of your registration. The Committee determined that the continued restriction of your registration remains necessary to uphold and declare appropriate standards of conduct and behaviour and to maintain public confidence in the profession and its regulation. The Committee could not be satisfied that, if faced with a similar situation, you would comply with your professional duty to inform the GDC of relevant matters.
22. The Committee determined that conditional registration would not be measurable or workable at this stage given the nature of the misconduct found against you, the risk of repetition and your continued lack of remediation some two years after being originally suspended. The Committee was satisfied that the continued suspension of your registration remains necessary and proportionate.

23. Accordingly, the Committee directs that the suspension of your registration be extended by a further period of six months with a review. This extended period will give you further time within which to reflect, undertake targeted CPD and develop insight.
24. The reviewing Committee might be assisted by your attendance at the review hearing and by evidence of the following:
- completion of education and learning courses relevant to your practice as a dental nurse and the GDC's Standards (such courses are available online for free or at a low cost);
 - written reflections on what you have learned from such courses and how you would apply this to your work as a dental nurse;
 - a written statement setting out your reflections on your misconduct and the importance of adhering to the GDC's Standards, including why it is important to immediately inform the GDC of any criminal proceedings to which you are subject.
25. The reviewing committee will be concerned with substance rather than form and so your written statement need not be formal or elaborate. It should be written in your own words and can be presented and structured however you wish. What is important is that it explains your understanding and reflections on your misconduct and on the importance of adhering to the GDC's standards.
26. The Committee reminds you of the importance of fully engaging at the review hearing in order to be able to return to the dental nursing career which you had developed since leaving school and about which you are so passionate.
27. That concludes this determination.