

PUBLIC HEARING

Professional Conduct Committee Initial Hearing

29 July to 1 August 2024

Name: TILLEY, Charlotte Louise

Registration number: 291376

Case number: CAS-199894-Y4P2L3

General Dental Council: Christopher Saad, Counsel
Instructed by Christopher Evans, IHLPS

Registrant: Not Present
Not Represented

Fitness to practise: Impaired by reason of misconduct

Outcome: Erased

Immediate order: Immediate suspension order

Committee Members: Gregory Heath (Chair, Dentist Member)
Liz Avital (Lay Member)
Lynne Frewin (Dental Care Professional Member)

Legal Adviser: Paul Kilcoyne (29 to 31 July 2024)
Nicola Gordelier (1 August 2024)

Committee Secretary: Lola Bird

1. This is a Professional Conduct Committee (PCC) hearing in respect of a case brought against Miss Tilley by the General Dental Council (GDC).
2. The hearing commenced on 29 July 2024 and is being conducted remotely by Microsoft Teams video-link.
3. Miss Tilley is neither present nor represented at these proceedings. The Case Presenter for the GDC is Mr Christopher Saad, Counsel.

Application to proceed with the hearing in the absence of the registrant – 29 July 2024

4. At the outset, Mr Saad made an application pursuant to Rule 54 of the *GDC (Fitness to Practise) Rules Order of Council 2006* ('the Rules') to proceed with the hearing notwithstanding Miss Tilley's absence.
5. The Committee took account of Mr Saad's submissions in respect of the application, and it had regard to the supporting documentation provided. The Committee accepted the advice of the Legal Adviser in relation to the issues of service and proceeding in the absence of the registrant.

Decision on service – 29 July 2024

6. The Committee first considered whether notice of the hearing had been served on Miss Tilley in accordance with Rules 13 and 65. It had sight of the Notice of Hearing dated 12 June 2024 ('the notice'), which was sent to Miss Tilley's registered address by Special Delivery and First Class post.
7. The Committee noted that the copy of the notice sent by Special Delivery was "*delivered back to sender*" on 14 June 2024. However, the Committee took into account that there is no requirement within the Rules for the GDC to prove delivery of the notice, only that it was sent. It was satisfied on the basis of the Royal Mail 'Track and Trace' information provided that the requirement to send notice had been met by the Council.
8. The Committee also took into account that a copy of the notice was sent to Miss Tilley on 11 June 2024 by way of an attachment within a secure email, and there is evidence that the attachment was downloaded. Furthermore, Miss Tilley sent an email response to the GDC on 11 June 2024 regarding this hearing.
9. The Committee was satisfied that the notice sent to Miss Tilley by post and by email complied with the 28-day notice period required by the Rules. It was also satisfied that the notice contained all the required particulars, including the date and time of the hearing, confirmation that it would be conducted remotely by video-link on Microsoft Teams, and that the Committee had the power to proceed with the hearing in Miss Tilley's absence.

10. On the basis of all the information before it, the Committee was satisfied that notice of the hearing had been served on Miss Tilley in accordance with the Rules.

Decision on whether to proceed with the hearing in the absence of the registrant – 29 July 2024

11. The Committee next considered whether to exercise its discretion under Rule 54 to proceed with the hearing in the absence of Miss Tilley. It approached this issue with the utmost care and caution. The Committee took into account the factors to be considered in reaching its decision, as set out in the case of *R v Jones* [2003] 1 AC 1HL, and as affirmed in the regulatory case of *General Medical Council v Adeogba* [2016] EWCA Civ 162.

12. The Committee remained mindful that fairness to Miss Tilley was an important consideration, however, it also bore in mind the need to be fair to the GDC, and the public interest in the expeditious disposal of this case.

13. The Committee was satisfied that Ms Tilley is aware of this PCC hearing. It had before it correspondence between her and the GDC regarding these proceedings, including an email dated 30 May 2024. In that email, Miss Tilley confirmed in response to a question put to her by the Council that she was content for the hearing to proceed in her absence. In addition, following her electronic receipt of the Notice of Hearing, Miss Tilley stated in a further email to the GDC dated 11 June 2024 *“I do not intend to attend the hearing scheduled for 29th July - 2nd August 2024. I do not wish to be represented at the hearing nor provide any further evidence in this case. I am happy for the case to proceed in my absence.”*

14. The Committee considered Miss Tilley’s confirmation that she would not be in attendance or represented at this hearing to be clear and unequivocal. She did not request an adjournment, and the Committee received no information to suggest that deferring the hearing would secure her attendance on a future date. In these circumstances, the Committee concluded that an adjournment would serve no meaningful purpose. It took into account that the GDC was ready to present its case, and that a number of witnesses had been scheduled to attend these proceedings, should they be required.

15. Having carefully considered the matter, the Committee determined that it was fair, appropriate and in the public interest to proceed with the hearing in the absence of Miss Tilley.

The charge

16. The charge against Miss Tilley being considered at this hearing is as follows:

“That being a registered dental therapist,

Prescriptions



1. *On or around 07 December 2020,*
 - a. *you wrote a prescription for Azzalure (a prescription only medicine) on which you:*
 - i. *named Patient A as the patient, when Patient A was not the intended patient; and/or*
 - ii. *named Dentist A as the prescriber, when Dentist A was not the prescriber; and/or*
 - iii. *signed the prescription as Dentist A, when Dentist A was not the prescriber; and/or*
 - iv. *named Practice A as the prescriber's address, when Practice A was not the prescriber's address.*
 - b. *issued the prescription detailed in 1 (a) using Practice A's logo without Practice A's consent.*
2. *Your conduct in respect to 1ai, and/or 1 aii, and/or 1 aiii, and/or 1 aiv and/or 1b, was:-*
 - i. *misleading; and/or*
 - ii. *dishonest because you knew you were making a false representations on the prescription.*
3. *On or around 27 January 2021,*
 - a. *you wrote a prescription for Bocoture (a prescription only medicine) on which you:*
 - i. *named Dentist A as the prescriber, when Dentist A was not the prescriber; and/or*
 - ii. *signed the prescription as Dentist A, when Dentist A was not the prescriber; and/or*
 - iii. *named Practice A as the prescriber's address, when Practice A was not the prescriber's address.*
 - b. *issued the prescription detailed in 3(a) using Practice A's logo without Practice A's consent.*
4. *Your conduct in respect to 3ai, and/or 3aii, and/or 3aiii, and/or 3b:*



i. misleading; and/or

ii. dishonest because you knew you were making a false representation on the prescription.

5. On or around 26 June 2021,

a. you wrote a prescription for Bocoture (a prescription only medicine) and Profhilo (a type of dermal filler) on which you:

i. named Dentist A as the prescriber, when Dentist A was not the prescriber; and/or

ii. signed the prescription as Dentist A, when Dentist A was not the prescriber; and/or

iii. named Practice A as the prescriber's address, when Practice A was not the prescriber's address.

b. issued the prescription detailed in 5(a) using Practice A's logo without Practice A's consent.

6. Your conduct in respect to 5ai, and/or 5aii, and/or 5aiii, and/or 5b was:

i. misleading; and/or

ii. dishonest because you knew you were making a false representation on the prescription.

7. On or around 07 April 2021,

a. you wrote a prescription for Bocoture (a prescription only medicine), Teosyal Redensity II (a type of dermal filler) and EPTQ S500 (a type of dermal filler) on which you:

i. named Patient A as the patient, when Patient A was not the intended patient; and/or

ii. named Dentist A as the prescriber, when Dentist A was not the prescriber; and/or

iii. signed the prescription as Dentist A, when Dentist A was not the prescriber; and/or



- iv. named Practice A as the prescriber's address, when Practice A was not the prescriber's address.*
- b. Your conduct in respect to 7ai, and/or 7aii, and/or 7aiii, and/or 7aiv was:*
- i. misleading; and/or*
- ii. dishonest because you knew you were making a false representation on the prescription.*
8. *On or around 7 April 2021,*
- a. you wrote a prescription for Bocoture (a prescription only medicine), Profhilo (a type of dermal filler) and Revolax Deep (a type of dermal filler) on which you:*
- i. named Dentist A as the prescriber, when Dentist A was not the prescriber; and/or*
- ii. signed the prescription as Dentist A, when Dentist A was not the prescriber; and/or iii. named Practice A as the prescriber's address, when Practice A was not the prescriber's address.*
9. *Your conduct in respect to 8ai, and/or 8aii, and/or 8aiii was:*
- i. misleading; and/or*
- ii. dishonest because you knew you were making a false representation on the prescription.*
10. *On or around 31 January 2022:*
- a. you wrote a prescription for Bocoture (a prescription only medicine) and Revolax Deep (a type of dermal filler) and on which you:*
- i. named Dentist A as the prescriber, when Dentist A was not the prescriber; and/or*
- ii. signed the prescription as Dentist A, when Dentist A was not the prescriber; and/or*
- iii. named Practice A as the prescriber's address, when Practice A was not the prescriber's address.*



b. issued the prescription detailed in 10a using Practice A's logo without Practice A's consent.

c. Prescribed the medicines referred to in 10a for yourself.

d. Your conduct in respect to 10ai, and/or 10aii, and/or 10aiii, and/or 10b, was:

i. misleading; and/or

ii. dishonest because you knew you were making a false representation on the prescription.

11. *On or around 31 January 2022:*

a. You wrote a prescription for "Revolax Deep" (a type of dermal filler)

i. named Dentist A as the prescriber, when Dentist A was not the prescriber; and/or

ii. signed the prescription as Dentist A, when Dentist A was not the prescriber; and/or

iii. named Practice A as the prescriber's address, when Practice A was not the prescriber's address.

b. Issued the prescription detailed in 11 (a) using Practice A's logo without Practice A's consent.

c. Your conduct in respect to 11ai, and/or 11aii, and/or 11aiii and/or 11b, was:

i. misleading; and/or

ii. dishonest because you knew you were making a false representation on the prescription.

Pharmacist A

12. *On 2 February 2022 you informed Pharmacist A that you had obtained the prescriptions approximately a year ago from Dentist A and that you would fill in the dates on them.*

13. *Your conduct in respect of 12 was:-*

a. misleading; and/or



- b. dishonest because you knew Dentist A had not issued you with these prescriptions.*
14. *On 2 February 2022 you informed Pharmacist A that in respect to the botulinum toxin prescription-only-medicines, you had only ever self-administered.*
15. *Your conduct in respect to allegation 14 was:*
- i. misleading; and/or*
- ii. dishonest because you had administered botulinum toxin to friends and family.*

Indemnity

16. *Between 18 April 2021 to 20 February 2022, you provided treatment for facial aesthetics without any or any adequate indemnity in place.*

And, by reason of the matters set out above, your fitness to practise is impaired by reason of your misconduct.”

Case background and opening submissions of the GDC

17. This case arises from Miss Tilley’s self-referral to the GDC in February 2022. In his opening submissions, Mr Saad drew the Committee’s attention to Miss Tilley’s email to the Council dated 9 February 2022, in which she stated that:

“I write to self-refer to the GDC as I have written private prescriptions for botulinum toxin and dermal filler on several occasions, as listed below, using the credentials of a dental practitioner that I used to work with. I used friends’ names and details for the prescriptions, but the prescription items were only ever used on myself, family members, and my partner. I would place an order and email over a copy of the prescriptions to the pharmacy for them to dispense and send to me the below products:

***20-10-20** - 2 scripts for bocouture 50ui 2 vials X2, bd microfine 30Gx8mm needles, aliaxin SR filler X2*

***07-12-20** - 1 script for azzalure 125ui x 2*

***27-01-21** - 1 script for bocouture 50ui 1 vial*

***07-04-21** - 2 scripts for bocouture 50ui 2 vials X2, teosyal redensity 2 X1, EPQT S500 X2, prophilo X1, Revolax deep X4*

***26-06-21** - 1 script for bocouture 50ui 2 vials, prophilo X2*

31-01-22 - 2 scripts) revolax deep X 5, bocoture 50ui 1 vial

I have used the above listed filler and the botulinum toxin on myself, family members and my partner. I have not used the filler or botulinum toxin on any paying patients or clients, only on myself, family members and my partner.

I would also like to add that I have provided botulinum toxin and dermal filler treatment to my partner, myself, and family members for a period of time when I did not have indemnity for claims arising from facial aesthetics (botulinum toxin and dermal filler treatment). I have had uninterrupted indemnity for my usual work as a dental hygienist/therapist..."

18. Mr Saad stated that Miss Tilley's email of 9 February 2022 sets out what the GDC's case is about, namely that Miss Tilley forged a number of prescriptions for use for herself and her family and friends, and that she did so using the credentials of a colleague (Dentist A), and the logo of a dental practice (Practice A).

19. With reference to the individual factual allegations set out in the charge, Mr Saad told the Committee that Patient A is the only patient to have provided a witness statement for the purpose of this hearing. He asked the Committee to note Patient A's written evidence that Miss Tilley, who had an aesthetics business, was recommended to her by a friend.

20. Patient A's evidence is that she attended Miss Tilley's home address for dermal fillers on 19 July 2019. Mr Saad highlighted that Patient A could recall little else about the appointment, and that she stated that she had no issues with the treatment Miss Tilley provided. However, Patient A confirmed in her witness statement that she has never been a patient at Practice A. Mr Saad further highlighted the evidence that the prescriptions in the name of Patient A appear to have been written by Miss Tilley on or around 7 December 2020 and 7 April 2021, when the patient's evidence is that she was only treated by Miss Tilley on that one occasion in July 2019.

21. Mr Saad submitted that the background to the other allegations relating to prescriptions all have similar backgrounds, with Miss Tilley admittedly using Dentist A's credentials and Practice A's logo to obtain various botulinum toxin and dermal filler products.

22. Mr Saad referred the Committee to the witness statement of Dentist A, the colleague whose credentials Miss Tilley has admitted to using for the prescriptions. Mr Saad asked the Committee to note Dentist A's account that he knew Ms Tilley, having worked with her at Practice A for a period of time. Dentist A's evidence is that he worked at the practice from 2018 to December 2022. Mr Saad highlighted Dentist A's account about concerns first coming to his attention in February 2022, when he received a query from Pharmacist A regarding a particular prescription. Dentist A gives his account in relation to each of the prescriptions concerned, including stating that he did not write any of them. Pharmacist A has also provided a witness statement for the purpose of this hearing.

23. Mr Saad further asked the Committee to have regard to the witness statement of Dentist B, the owner of Practice A. Dentist B provides evidence in relation to Miss Tilley's use of the practice's logo on the prescriptions, including stating in his witness statement that "*I confirm that neither permission nor consent was obtained*". Dentist B's evidence indicates that Miss Tilley worked at Practice A from September 2020 to January 2021.

24. Mr Saad submitted that the GDC's case in relation to each of the prescriptions is that Miss Tilley's conduct was obviously misleading and dishonest.

25. In relation to the factual allegations concerning Miss Tilley's interactions with Pharmacist A, who raised concerns about some of the prescriptions directly with her, Mr Saad asked the Committee to have regard to Pharmacist A's witness statement and associated exhibits.

26. Mr Saad highlighted that there are also associated allegations of misleading and dishonest conduct in respect of what Miss Tilley is said to have told Pharmacist A. Mr Saad submitted that Miss Tilley's "*knee-jerk reaction*" when questioned by Pharmacist A, appears to have been to make an assertion about the prescriptions that was untrue. However, Mr Saad stated that soon after, within the same conversation, Miss Tilley in her own words 'came clean' and admitted what she had been doing.

27. In relation to the issue of indemnity, Mr Saad asked the Committee to have regard to Miss Tilley's own admission that she "*...did not have indemnity for claims arising from facial aesthetics (botulinum toxin and dermal filler treatment)*", as well as the relevant documentary evidence provided.

Evidence

28. The evidence received by the Committee at the fact-finding stage has been solely documentary. Whilst all the witnesses were available to provide oral evidence, in addition to their witness statements, the Committee was satisfied that it did not have any questions for them that would assist in its factual inquiry beyond the written evidence they have already provided. Therefore, the Committee did not require any of the witnesses to attend to give oral evidence.

29. Accordingly, the Committee had before it the documentary evidence outlined by Mr Saad in his opening submissions, which was as follows:

- A production statement dated 2 February 2024, prepared by a Paralegal at the GDC, producing a number of exhibits, including Miss Tilley's self-referral email of 9 February 2022.
- The witness statement and supplementary witness statement of Patient A dated 8 January 2024 and 24 January 2024.
- The witness statement of Dentist A dated 21 December 2023.

- The witness statement of Pharmacist A dated 10 January 2024
- The witness statement of Dentist B dated 18 December 2023.

30. The Committee further received the witness statement and supplementary witness statement of Pharmacist B dated 15 December 2023 and 12 February 2024. Pharmacist B, a colleague of Pharmacist A at the same pharmacy.

31. The exhibits provided by Pharmacist A, Pharmacist B and Dentist A with their witness statements included copies of the various prescriptions referred to in the factual allegations.

32. The Committee was also provided with a report dated 23 January 2024, prepared by the GDC’s expert witness in this case Dr Jennifer Ward, whose expert field is in restorative dentistry. Dr Ward’s expert report largely deals with matters that may be relevant at a later stage in the hearing process.

Findings of Fact – 30 July 2024

33. In making its findings on the factual allegations in this case, the Committee considered all the evidence presented to it.

34. In the absence of Miss Tilley, Mr Saad did not make comprehensive closing submissions on behalf of the GDC. It was his submission, however, that on the basis of the cogent evidence provided, and Miss Tilley’s written admissions, the Committee could be satisfied that the evidential burden on the Council has been met.

35. The Committee accepted the advice of the Legal Adviser. It considered each of the factual allegations individually, bearing in mind that the burden of proof rests with the GDC, and that the standard of proof is the civil standard, that is, whether the alleged facts are proved on the balance of probabilities. The Committee has had to decide on the evidence whether it is more likely than not that the alleged matters occurred.

36. The Committee also bore in mind the relevant test for dishonesty as set out in the case of *Ivey v Genting Casinos (UK) Ltd. t/a Crockfords* [2017] UKSC 67 (‘the case of *Ivey*’).

37. The Committee’s findings are as follows:

Prescriptions	
1(a)(i)	<p>1. <i>On or around 07 December 2020,</i></p> <p style="padding-left: 40px;"><i>a. you wrote a prescription for Azzalure (a prescription only medicine) on which you:</i></p> <p style="padding-left: 40px;"><i>i. named Patient A as the patient, when Patient A was not the intended</i></p>



	<p><i>patient;</i></p> <p>Found proved.</p> <p>The Committee had before it a copy of the prescription in question, which named Patient A as the patient and is dated 7 December 2020.</p> <p>The Committee had regard to Patient A’s evidence, as contained in her witness statement, that she only attended one appointment with Ms Tilley, for dermal fillers, and that this appointment was on 19 July 2019, not on or around 7 December 2020. The Committee considered that Patient A was clear in her written evidence about this issue. It noted that she could not recall specific details of the appointment, which was some years ago, but said that she had identified the date of the appointment from messages between her and her friend, and that the appointment had taken place at Miss Tilley’s home address. Patient A also confirmed that she had never been a patient at Practice A, which is the practice named on the prescription.</p> <p>The Committee accepted the evidence of Patient A to be credible. It found her evidence to be clear and factual, and it had no reason to question her account. The Committee also bore in mind Miss Tilley’s admission in her self-referral that she had falsified the prescription concerned. She also admitted to obtaining botulinum toxin and dermal filler products for use on herself and her family and friends.</p> <p>It was the conclusion of the Committee, taking all the evidence into account, that it was more likely than not that Patient A was not the intended recipient for this prescription of Azzalure dated 7 December 2020.</p>
<p>1(a)(ii)</p>	<p><i>1. On or around 07 December 2020,</i></p> <p><i>a. you wrote a prescription for Azzalure (a prescription only medicine) on which you:</i></p> <p><i>ii. named Dentist A as the prescriber, when Dentist A was not the prescriber; and/or</i></p> <p>Found proved.</p> <p>The Committee saw from the prescription in question that Dentist A was named as the prescriber.</p> <p>The Committee had regard to Dentist A’s witness statement, which included his evidence that <i>“I have never taken a Botox or filler course and it is not something that I would prescribe”</i>.</p> <p>In respect of this particular prescription for Azzalure dated 7 December 2020, Dentist A states in his witness statement that <i>“The name and registration number</i></p>



	<p><i>on this prescription is correct. I can confirm that the signature on the prescription does not belong to me as my signature is completely different. The signature on the prescription does not even state my name,... I was definitely working as an associate dentist at the Practice on the date listed on the prescription, 7th December 2020. I may have been working at the Practice on that day as it was a day that I would have worked at that Practice. I have never undertaken a dental examination of the patient, [Patient A] and I did not examine the patient for the purposes of prescribing the medications listed. I can confirm that I did not prescribe the medications listed on the prescription and that the Registrant did not ask my permission to use my credentials or inform me that she was writing this prescription".</i> Dentist A exhibited with his witness statement a photograph of his signature.</p> <p>The Committee accepted the evidence of Dentist A to be credible. It had no reason to question his account. The Committee further noted Miss Tilley's own admission in her self-referral to the GDC that she wrote this prescription for Azzalure dated 7 December 2020 using the credentials of Dentist A. Accordingly, he was not the prescriber.</p> <p>The Committee was satisfied on all the evidence that this allegation is proved.</p>
<p>1(a)(iii)</p>	<p><i>1. On or around 07 December 2020,</i></p> <p style="padding-left: 40px;"><i>a. you wrote a prescription for Azzalure (a prescription only medicine) on which you:</i></p> <p style="padding-left: 40px;"><i>iii. signed the prescription as Dentist A, when Dentist A was not the prescriber;</i></p> <p>Found proved.</p> <p>The Committee found this allegation at 1(a)(iii) proved for the same reasons given in respect of 1(a)(ii) above. This included Dentist A's evidence that stated, "<i>I can confirm that the signature on the prescription does not belong to me as my signature is completely different</i>". The Committee also had regard to Miss Tilley's admission that she wrote this prescription for Azzalure dated 7 December 2020 using the credentials of Dentist A. The Committee was satisfied on the evidence before it that Miss Tilley signed the prescription as Dentist A.</p>
<p>1(a)(iv)</p>	<p><i>1. On or around 07 December 2020,</i></p> <p style="padding-left: 40px;"><i>a. you wrote a prescription for Azzalure (a prescription only medicine) on which you:</i></p> <p style="padding-left: 40px;"><i>iv. named Practice A as the prescriber's address, when Practice A was not the prescriber's address;</i></p> <p>Found proved.</p>



	<p>The Committee saw from the prescription in question that Practice A was named as the prescriber’s address.</p> <p>In considering this allegation, the Committee noted that Dentist A, whose credentials were used by Miss Tilley in writing this prescription, did work at Practice A in December 2020. However, the Committee considered matters in the way that it considered was intended, this being that Practice A was not the prescribing practice, which it accepted.</p> <p>In finding that Practice A was not the prescribing practice, the Committee took into account its findings 1(a)(ii) and 1(a)(iii) above, as well as the evidence of Dentist B, the owner of Practice A. In his witness statement, Dentist B stated that Practice A does not offer the types of treatment for which the prescriptions in this case were written. Dentist B stated that the medicine prescribed on the prescription of 7 December 2020, namely Azzalure, is not offered at Practice A.</p> <p>Having considered all the evidence, the Committee was satisfied that this allegation at 1(a)(iv) is proved to the requisite standard.</p>
<p>1(b).</p>	<p>1. <i>On or around 07 December 2020,</i></p> <p style="padding-left: 40px;"><i>b. [you] issued the prescription detailed in 1 (a) using Practice A’s logo without Practice A’s consent.</i></p> <p>Found proved.</p> <p>The Committee saw from the prescription in question that Practice A’s logo was used.</p> <p>The Committee had regard to the witness statement of Dentist B, the owner of Practice A, who stated in respect of the prescription for Azzalure dated 7 December 2020, <i>“The Practice address and telephone number on this prescription is correct. The prescription is written using the Practice’s logo but the Registrant did not use the letter headed paper used at the Practice at that time in December 2020. The paper used for this prescription looks different from the letter headed paper used at the Practice. The Practice’s header can be copied from google as it is only the Practice’s logo...Permission from myself, as Practice owner, should have been obtained to use the Practice’s letter headed paper or the Practice’s details for this prescription. However, permission could not have been obtained from the Registrant to use the Practice’s letter headed paper or the Practice’s details for this prescription as she was limited in her capacity as a Dental Therapist Hygienist and therefore could not prescribe such prescriptions. Also, the medication listed on the prescription is not offered at the Practice. I can confirm that permission or consent was not obtained by the Registrant to use the Practice’s letter headed paper or the Practice’s details for this prescription...”</i></p> <p>The Committee accepted Dentist B’s evidence as credible. It also took into</p>



	<p>account that Miss Tilley has admitted to falsifying the prescription in question, and a number of other prescriptions. The Committee was satisfied on the balance of probabilities that Miss Tilley issued the prescription for Azzalure dated 7 December 2020 using Practice A's logo without the practice's consent.</p>
2(i).	<p>2. <i>Your conduct in respect to 1ai, and/or 1 aii, and/or 1 aiii, and/or 1 aiv and/or 1b, was:-</i></p> <p><i>i. misleading;</i></p> <p>Found proved in respect of 1(a)(i), 1(a)(ii), 1(a)(iii), 1(a)(iv) and 1(b).</p> <p>The Committee was satisfied on all the evidence that Miss Tilley's conduct in respect of the prescription for Azzalure dated 7 December 2020 was misleading. This is because her actions gave the wrong impression that the prescription was intended for Patient A, and that it had been authorised by Dentist A with the consent of Practice A.</p> <p>The Committee found this allegation at 2(i) proved in respect of all the matters at head of charge 1.</p>
2(ii)	<p>2. <i>Your conduct in respect to 1ai, and/or 1 aii, and/or 1 aiii, and/or 1 aiv and/or 1b, was:-</i></p> <p><i>ii. dishonest because you knew you were making a false representations on the prescription.</i></p> <p>Found proved in respect of 1(a)(i), 1(a)(ii), 1(a)(iii), 1(a)(iv) and 1(b).</p> <p>The Committee applied the relevant test for dishonesty as set out in the case of <i>Ivey</i>. In doing so, it considered whether Miss Tilley's admitted conduct in falsely writing the prescription for Azzalure dated 7 December 2020 would be regarded as dishonest by the standards of ordinary decent people. The Committee was satisfied that her conduct would be regarded as dishonest by those standards. Accordingly, it found this allegation at 2(ii) proved in respect of all the matters at head of charge 1.</p>
3(a)(i).	<p>3. <i>On or around 27 January 2021,</i></p> <p><i>a. you wrote a prescription for Bocoture (a prescription only medicine) on which you:</i></p> <p><i>i. named Dentist A as the prescriber, when Dentist A was not the prescriber;</i></p> <p>Found proved.</p> <p>The Committee had before it a copy of the prescription in question, dated 27 January 2021, which named Dentist A as the prescriber.</p>



	<p>In finding this allegation at 3(a)(i) proved, the Committee accepted the evidence of Dentist A. In respect of this particular prescription, he stated in his witness statement that, <i>“The name and registration number on this prescription is correct. I can confirm that the signature on the prescription does not belong to me. The signature on the prescription does not even state my name. I was working as an associate dentist at the Practice on the date listed on the prescription, 27th January 2021, however I cannot confirm that I was working at the Practice on that date I have never undertaken a dental examination of the patient, [named patient], and I did not examine the patient for the purposes of prescribing the medications listed. I can confirm that I did not prescribe the medications listed on the prescription and that the Registrant did not ask my permission to use my credentials or inform me that she was writing this prescription”</i>.</p> <p>The Committee further noted Miss Tilley’s own admission in her self-referral to the GDC that she wrote this prescription for Bocoture dated 27 January 2021 using the credentials of Dentist A. Accordingly, he was not the prescriber.</p> <p>The Committee was satisfied that this allegation is proved.</p>
<p>3(a)(ii)</p>	<p>3. <i>On or around 27 January 2021,</i></p> <p style="padding-left: 40px;"><i>a. you wrote a prescription for Bocoture (a prescription only medicine) on which you:</i></p> <p style="padding-left: 40px;"><i>ii. signed the prescription as Dentist A, when Dentist A was not the prescriber;</i></p> <p>Found proved.</p> <p>The Committee found this allegation at 3(a)(ii) proved for the same reasons given in respect of 3(a)(i) above. This included Dentist A’s evidence stating that <i>“I can confirm that the signature on the prescription does not belong to me”</i>. The Committee also had regard to Miss Tilley’s admission that she wrote this prescription using the credentials of Dentist A. The Committee was satisfied on the evidence before it that Miss Tilley signed the prescription as Dentist A.</p>
<p>3(a)(iii)</p>	<p>3. <i>On or around 27 January 2021,</i></p> <p style="padding-left: 40px;"><i>a. you wrote a prescription for Bocoture (a prescription only medicine) on which you:</i></p> <p style="padding-left: 40px;"><i>iii. named Practice A as the prescriber’s address, when Practice A was not the prescriber’s address.</i></p> <p>Found proved.</p> <p>The Committee saw from the prescription in question that Practice A was named as the prescriber’s address. It found this allegation proved for the same reasons</p>



	<p>given at 1(a)(iv) above. It was satisfied on all the evidence that Practice A was not the prescribing practice. Furthermore, the Committee noted the evidence of Dentist B, the owner of Practice A, that Miss Tilley worked at the practice between 28 September 2020 and 18 January 2021. Therefore, Miss Tilley was not working at the practice on the date of this prescription.</p>
3(b).	<p>3. <i>On or around 27 January 2021,</i></p> <p><i>b. [You] issued the prescription detailed in 3(a) using Practice A's logo without Practice A's consent.</i></p> <p>Found proved.</p> <p>For the same reasons outlined in respect of 1(b) above. The Committee noted that Dentist B provided similar evidence in relation to the use of Practice A's logo, including that Miss Tilley was not given consent to use it.</p>
4(i)	<p>4. <i>Your conduct in respect to 3ai, and/or 3aii, and/or 3aiii, and/or 3b:</i></p> <p><i>i. misleading;</i></p> <p>Found proved in respect of 3(a)(i), 3(a)(ii), 3(a)(iii) and 3(b).</p> <p>For the same reasons given in respect of 2(i) above. The Committee was satisfied on all the evidence that Miss Tilley's conduct in respect of the prescription for Bocoture dated 27 January 2021 was misleading.</p>
4(ii)	<p>4. <i>Your conduct in respect to 3ai, and/or 3aii, and/or 3aiii, and/or 3b:</i></p> <p><i>ii. dishonest because you knew you were making a false representation on the prescription.</i></p> <p>Found proved in respect of 3(a)(i), 3(a)(ii), 3(a)(iii) and 3(b).</p> <p>For the same reasons given in respect of 2(ii) above. The Committee was satisfied that Miss Tilley's admitted conduct in respect of falsely writing the prescription for Bocoture dated 27 January 2021 would be regarded as dishonest by the standards of ordinary decent people.</p>
5(a)(i)	<p>5. <i>On or around 26 June 2021,</i></p> <p><i>a. you wrote a prescription for Bocoture (a prescription only medicine) and Profhilo (a type of dermal filler) on which you:</i></p> <p><i>i. named Dentist A as the prescriber, when Dentist A was not the prescriber;</i></p> <p>Found proved.</p>



	<p>The Committee had before it a copy of the prescription in question, dated 26 June 2021, which named Dentist A as the prescriber.</p> <p>In finding this allegation at 5(a)(i) proved, the Committee accepted the evidence of Dentist A. In respect of this particular prescription, he stated in his witness statement that, <i>“The name and registration number on this prescription is correct. I can confirm that the signature on the prescription does not belong to me I may have been working as an associate dentist at the Practice on the date listed on the prescription, 26th June 2021, however I cannot confirm that I was working at the Practice on that date...I have never undertaken a dental examination of the patient, [named patient], and I did not examine the patient for the purposes of prescribing the medications listed. I can confirm that I did not prescribe the medications listed on the prescription and that the Registrant did not ask my permission to use my credentials or inform me that she was writing this prescription”.</i></p> <p>The Committee further noted Miss Tilley’s own admission in her self-referral to the GDC that she wrote this prescription for Bocoture and Profhilo dated 26 June 2021 using the credentials of Dentist A. Accordingly, he was not the prescriber.</p> <p>The Committee was satisfied that this allegation is proved.</p>
<p>5(a)(ii)</p>	<p>5. <i>On or around 26 June 2021,</i></p> <p><i>a. you wrote a prescription for Bocoture (a prescription only medicine) and Profhilo (a type of dermal filler) on which you:</i></p> <p><i>ii. signed the prescription as Dentist A, when Dentist A was not the prescriber;</i></p> <p>Found proved.</p> <p>The Committee found this allegation at 5(a)(ii) proved for the same reasons given in respect of 5(a)(i) above. This included Dentist A’s evidence stating that <i>“I can confirm that the signature on the prescription does not belong to me”</i>. The Committee also had regard to Miss Tilley’s admission that she wrote this prescription using the credentials of Dentist A. The Committee was satisfied on the evidence before it that Miss Tilley signed the prescription as Dentist A.</p>
<p>5(a)(iii)</p>	<p>5. <i>On or around 26 June 2021,</i></p> <p><i>a. you wrote a prescription for Bocoture (a prescription only medicine) and Profhilo (a type of dermal filler) on which you:</i></p> <p><i>iii. named Practice A as the prescriber’s address, when Practice A was not the prescriber’s address.</i></p> <p>Found proved.</p>



	<p>The Committee saw from the prescription in question that Practice A was named as the prescriber's address. It found this allegation proved for the same reasons given at 1(a)(iv) and 3(a)(iii) above. It was satisfied on all the evidence that Practice A was not the prescribing practice.</p>
5(b).	<p>5. <i>On or around 26 June 2021,</i></p> <p><i>b. [You] issued the prescription detailed in 5(a) using Practice A's logo without Practice A's consent.</i></p> <p>Found proved.</p> <p>For the same reasons outlined in respect of 1(b) and 3(b) above. The Committee noted that Dentist B provided similar evidence in relation to the use of Practice A's logo, including that Miss Tilley was not given consent to use it.</p>
6(i)	<p>6. <i>Your conduct in respect to 5ai, and/or 5aii, and/or 5aiii, and/or 5b was:</i></p> <p><i>i. misleading;</i></p> <p>Found proved in respect of 5(a)(i), 5(a)(ii), 5(a)(iii) and 5(b).</p> <p>For the same reasons given in respect of 2(i) and 4(i) above. The Committee was satisfied on all the evidence that Miss Tilley's conduct in respect of the prescription for Bocoture and Prophilol dated 26 June 2021 was misleading.</p>
6(ii)	<p>6. <i>Your conduct in respect to 5ai, and/or 5aii, and/or 5aiii, and/or 5b was:</i></p> <p><i>ii. dishonest because you knew you were making a false representation on the prescription.</i></p> <p>Found proved in respect of 5(a)(i), 5(a)(ii), 5(a)(iii) and 5(b).</p> <p>For the same reasons given in respect of 2(ii) and 4(ii) above. The Committee was satisfied that Miss Tilley's admitted conduct in respect of falsely writing the prescription for Bocoture and Prophilol dated 26 June 2021 would be regarded as dishonest by the standards of ordinary decent people.</p>
7(a)(i)	<p>7. <i>On or around 07 April 2021,</i></p> <p><i>a. you wrote a prescription for Bocoture (a prescription only medicine), Teosyal Redensity II (a type of dermal filler) and EPTQ S500 (a type of dermal filler) on which you:</i></p> <p><i>i. named Patient A as the patient, when Patient A was not the intended patient;</i></p>



	<p>Found proved.</p> <p>The Committee had before it a copy of the prescription in question, which named Patient A as the patient and is dated 7 April 2021.</p> <p>Having accepted Patient A’s evidence that she only attended one appointment with Miss Tilley for dermal filler on 19 July 2019, the Committee was satisfied that Patient A was not the intended patient for this prescription of 7 April 2021. In reaching its decision, the Committee also took into account Miss Tilley’s admission to obtaining botulinum toxin and dermal filler products for use on herself and her family and friends.</p>
<p>7(a)(ii)</p>	<p><i>7. On or around 07 April 2021,</i></p> <p><i>a. you wrote a prescription for Bocoture (a prescription only medicine), Teosyal Redensity II (a type of dermal filler) and EPTQ S500 (a type of dermal filler) on which you:</i></p> <p><i>ii. named Dentist A as the prescriber, when Dentist A was not the prescriber;</i></p> <p>Found proved.</p> <p>The Committee had before it a copy of the prescription in question, dated 7 April 2021, which named Dentist A as the prescriber.</p> <p>In finding this allegation at 7(a)(ii) proved, the Committee accepted the written evidence of Dentist A, which was similar to his evidence given in respect of the previously considered prescriptions. The Committee found that Dentist A was clear in stating that the signature on this prescription is not his, that he did not undertake an examination of Patient A, who was named on the prescription, and that Miss Tilley did not ask his permission to use his credentials, nor did she inform him that she was writing this prescription.</p> <p>The Committee further noted Miss Tilley’s own admission in her self-referral to the GDC that she falsely wrote this prescription for Bocoture, Teosyal Redensity II and EPTQ S500 using the credentials of Dentist A. Accordingly, he was not the prescriber.</p> <p>The Committee was satisfied that this allegation is proved.</p>
<p>7(a)(iii)</p>	<p><i>7. On or around 07 April 2021,</i></p> <p><i>a. you wrote a prescription for Bocoture (a prescription only medicine), Teosyal Redensity II (a type of dermal filler) and EPTQ S500 (a type of dermal filler) on which you:</i></p> <p><i>iii. signed the prescription as Dentist A, when Dentist A was not the</i></p>



	<p><i>prescriber;</i></p> <p>Found proved.</p> <p>The Committee found this allegation at 7(a)(iii) proved for the same reasons given in respect of 7(a)(ii) above. This included Dentist A’s evidence stating that, “<i>The signature on the prescription is completely different and does not even resemble my signature</i>”. The Committee also had regard to Miss Tilley’s admission that she wrote this prescription using the credentials of Dentist A. The Committee was satisfied on the evidence before it that Miss Tilley signed the prescription as Dentist A.</p>
7(a)(iv)	<p>7. <i>On or around 07 April 2021,</i></p> <p><i>a. you wrote a prescription for Bocoture (a prescription only medicine), Teosyal Redensity II (a type of dermal filler) and EPTQ S500 (a type of dermal filler) on which you:</i></p> <p><i>iv. named Practice A as the prescriber’s address, when Practice A was not the prescriber’s address.</i></p> <p>Found proved.</p> <p>The Committee saw from the prescription in question that Practice A was named as the prescriber’s address. It found this allegation proved for the same reasons given at 1(a)(iv), 3(a)(iii) and 5(a)(iii) above. It was satisfied on all the evidence that Practice A was not the prescribing practice.</p>
7(b)(i)	<p>7. <i>On or around 07 April 2021,</i></p> <p><i>b. Your conduct in respect to 7ai, and/or 7aii, and/or 7aiii, and/or 7aiv was:</i></p> <p><i>i. misleading;</i></p> <p>Found proved in respect of 7(a)(i), 7(a)(ii), 7(a)(iii) and 7(a)(iv).</p> <p>For the same reasons given in respect of 2(i), 4(i) and 6(i) above. The Committee was satisfied on all the evidence that Miss Tilley’s conduct in respect of the prescription for Bocoture, Teosyal Redensity II and EPTQ S500 dated 7 April 2021 was misleading.</p>
7(b)(ii)	<p>7. <i>On or around 07 April 2021,</i></p> <p><i>b. Your conduct in respect to 7ai, and/or 7aii, and/or 7aiii, and/or 7aiv was:</i></p>



	<p><i>ii. dishonest because you knew you were making a false representation on the prescription.</i></p> <p>Found proved in respect of 7(a)(i), 7(a)(ii), 7(a)(iii) and 7(a)(iv).</p> <p>For the same reasons given in respect of 2(ii), 4(ii) and 6(ii) above. The Committee was satisfied that Miss Tilley’s admitted conduct in respect of falsely writing the prescription for Bocoture, Teosyal Redensity II and EPTQ S500 dated 7 April 2021 would be regarded as dishonest by the standards of ordinary decent people.</p>
8(a)(i)	<p>8. <i>On or around 7 April 2021,</i></p> <p><i>a. you wrote a prescription for Bocoture (a prescription only medicine), Profhilo (a type of dermal filler) and Revolax Deep (a type of dermal filler) on which you:</i></p> <p><i>i. named Dentist A as the prescriber, when Dentist A was not the prescriber;</i></p> <p>Found proved.</p> <p>The Committee had before it a copy of the prescription in question, dated 7 April 2021, which named Dentist A as the prescriber.</p> <p>In finding this allegation at 8(a)(i) proved, the Committee accepted the written evidence of Dentist A, which was similar to his evidence given in respect of the previously considered prescriptions. The Committee found that Dentist A was clear in stating that the signature on this prescription is not his, that he did not undertake an examination of the patient named on the prescription, and that Miss Tilley did not ask his permission to use his credentials, nor did she inform him that she was writing this prescription.</p> <p>The Committee further noted Miss Tilley’s own admission in her self-referral to the GDC that she falsely wrote this prescription for Bocoture, Profhilo and Revolax Deep dated 7 April 2021, using the credentials of Dentist A. Accordingly, he was not the prescriber.</p> <p>The Committee was satisfied that this allegation is proved.</p>
8(a)(ii)	<p>8. <i>On or around 7 April 2021,</i></p> <p><i>a. you wrote a prescription for Bocoture (a prescription only medicine), Profhilo (a type of dermal filler) and Revolax Deep (a type of dermal filler) on which you:</i></p> <p><i>ii. signed the prescription as Dentist A, when Dentist A was not the prescriber; and/or</i></p>



	<p>Found proved.</p> <p>The Committee found this allegation at 8(a)(ii) proved for the same reasons given in respect of 8(a)(i) above. This included Dentists A’s evidence stating that <i>“I can confirm that the signature on the prescription does not belong to me for the same reasons listed above”</i>. The Committee also had regard to Miss Tilley’s admission that she wrote this prescription using the credentials of Dentist A. The Committee was satisfied on the evidence before it that Miss Tilley signed the prescription as Dentist A.</p>
<p>8(a)(iii)</p>	<p>8. <i>On or around 7 April 2021,</i></p> <p style="padding-left: 40px;"><i>a. you wrote a prescription for Bocoture (a prescription only medicine), Profhilo (a type of dermal filler) and Revolax Deep (a type of dermal filler) on which you:</i></p> <p style="padding-left: 40px;"><i>iii. named Practice A as the prescriber’s address, when Practice A was not the prescriber’s address.</i></p> <p>Found proved.</p> <p>The Committee saw from the prescription in question that Practice A was named as the prescriber’s address. It found this allegation proved for the same reasons given at 1(a)(iv), 3(a)(iii), 5(a)(iii) and 7(a)(iv) above. It was satisfied on all the evidence that Practice A was not the prescribing practice.</p>
<p>9(i)</p>	<p>9. <i>Your conduct in respect to 8ai, and/or 8aii, and/or 8aiii was:</i></p> <p style="padding-left: 40px;"><i>i. misleading;</i></p> <p>Found proved in respect of 8(a)(i), 8(a)(ii) and 8(a)(iii).</p> <p>For the same reasons given in respect of 2(i), 4(i), 6(i) and 7(b)(i) above. The Committee was satisfied on all the evidence that Miss Tilley’s conduct in respect of the prescription for Bocoture, Profhilo and Revolax Deep dated 7 April 2021 was misleading.</p>
<p>9(ii)</p>	<p>9. <i>Your conduct in respect to 8ai, and/or 8aii, and/or 8aiii was:</i></p> <p style="padding-left: 40px;"><i>ii. dishonest because you knew you were making a false representation on the prescription.</i></p> <p>Found proved in respect of 8(a)(i), 8(a)(ii) and 8(a)(iii).</p> <p>For the same reasons given in respect of 2(ii), 4(ii), 6(ii) and 7(b)(ii) above. The Committee was satisfied that Miss Tilley’s admitted conduct in respect of falsely writing the prescription for Bocoture, Profhilo and Revolax Deep dated 7 April</p>



	<p>2021 would be regarded as dishonest by the standards of ordinary decent people.</p>
10(a)(i)	<p>10. On or around 31 January 2022:</p> <ul style="list-style-type: none">a. you wrote a prescription for Bocoture (a prescription only medicine) and Revolax Deep (a type of dermal filler) and on which you:<ul style="list-style-type: none">i. named Dentist A as the prescriber, when Dentist A was not the prescriber; <p>Found proved.</p> <p>The Committee had before it a copy of the prescription in question, dated 31 January 2022, which named Dentist A as the prescriber.</p> <p>In finding this allegation at 10(a)(i) proved, the Committee accepted the written evidence of Dentist A, which was similar to his evidence given in respect of the previously considered prescriptions. The Committee found that Dentist A was clear in stating that the signature on this prescription is not his, that he did not undertake an examination of the patient named on the prescription, and that Miss Tilley did not ask his permission to use his credentials, nor did she inform him that she was writing this prescription.</p> <p>The Committee further noted Miss Tilley’s own admission in her self-referral to the GDC that she falsely wrote this prescription for Bocoture and Revolax Deep dated 31 January 2022, using the credentials of Dentist A. Accordingly, he was not the prescriber.</p> <p>The Committee was satisfied that this allegation is proved.</p>
10(a)(ii)	<p>10. On or around 31 January 2022:</p> <ul style="list-style-type: none">a. you wrote a prescription for Bocoture (a prescription only medicine) and Revolax Deep (a type of dermal filler) and on which you:<ul style="list-style-type: none">ii. signed the prescription as Dentist A, when Dentist A was not the prescriber; <p>Found proved.</p> <p>The Committee found this allegation at 10(a)(ii) proved for the same reasons given in respect of 10(a)(i) above. This included Dentist A’s evidence stating that “I can confirm that the signature on the prescription does not belong to me for the same reasons listed above”. The Committee also had regard to Miss Tilley’s admission that she wrote this prescription using the credentials of Dentist A. The Committee was satisfied on the evidence before it that Miss Tilley signed the</p>



	prescription as Dentist A.
10(a)(iii)	<p>10. On or around 31 January 2022:</p> <p><i>a. you wrote a prescription for Bocoture (a prescription only medicine) and Revolax Deep (a type of dermal filler) and on which you:</i></p> <p><i>iii. named Practice A as the prescriber’s address, when Practice A was not the prescriber’s address.</i></p> <p>Found proved.</p> <p>The Committee saw from the prescription in question that Practice A was named as the prescriber’s address. It found this allegation proved for the same reasons given at 1(a)(iv), 3(a)(iii), 5(a)(iii) 7(a)(iv) and 8(a)(iii) above. It was satisfied on all the evidence that Practice A was not the prescribing practice.</p>
10(b)	<p>10. On or around 31 January 2022:</p> <p><i>b. [You] issued the prescription detailed in 10a using Practice A’s logo without Practice A’s consent.</i></p> <p>Found proved.</p> <p>For the same reasons outlined in respect of 1(b) 3(b) and 5(b) above. The Committee noted that Dentist B provided similar evidence in relation to the use of Practice A’s logo, including that Miss Tilley was not given consent to use it.</p>
10(c)	<p>10. On or around 31 January 2022:</p> <p><i>c. [You] Prescribed the medicines referred to in 10a for yourself.</i></p> <p>Found proved.</p> <p>The Committee had before it a copy of the prescription in question, which shows that Miss Tilley’s name on it. It also took into account her admission that she would use some of the prescribed medication on herself. The Committee was satisfied on the evidence that this allegation is proved.</p>
10(i)	<p>10. Your conduct in respect to 10ai, and/or 10aii, and/or 10aiii, and/or 10b, was:</p> <p><i>i. misleading;</i></p> <p>Found proved in respect of 10(a)(i), 10(a)(ii), 10(a)(iii) and 10(b).</p> <p>For the same reasons given in respect of 2(i), 4(i), 6(i), 7(b)(i) and 9(i) above. The Committee was satisfied on all the evidence that Miss Tilley’s conduct in respect of the prescription for Bocoture and Revolax Deep dated 31 January 2022 was misleading.</p>



<p>10(ii)</p>	<p><i>10. Your conduct in respect to 10ai, and/or 10aii, and/or 10aiii, and/or 10b, was:</i></p> <p><i>ii. dishonest because you knew you were making a false representation on the prescription.</i></p> <p>For the same reasons given in respect of 2(ii), 4(ii), 6(ii), 7(b)(ii) and 9(ii) above. The Committee was satisfied that Miss Tilley’s admitted conduct in respect of falsely writing the prescription for Bocoture and Revolax Deep dated 31 January 2022 would be regarded as dishonest by the standards of ordinary decent people.</p>
<p>11(a)(i)</p>	<p><i>11. On or around 31 January 2022:</i></p> <p><i>a. You wrote a prescription for “Revolax Deep” (a type of dermal filler)</i></p> <p><i>i. named Dentist A as the prescriber, when Dentist A was not the prescriber; and/or</i></p> <p>Found proved.</p> <p>The Committee had before it a copy of the prescription in question, dated 31 January 2022, which named Dentist A as the prescriber.</p> <p>In finding this allegation at 11(a)(i) proved, the Committee accepted the written evidence of Dentist A, which was similar to his evidence given in respect of the previously considered prescriptions. The Committee found that Dentist A was clear in stating that the signature on this prescription is not his, that he did not undertake an examination of the patient named on the prescription, and that Miss Tilley did not ask his permission to use his credentials, nor did she inform him that she was writing this prescription.</p> <p>The Committee further noted Miss Tilley’s own admission in her self-referral to the GDC that she falsely wrote this prescription for Revolax Deep dated 31 January 2022, using the credentials of Dentist A. Accordingly, he was not the prescriber.</p> <p>The Committee was satisfied that this allegation is proved.</p>
<p>11(a)(ii)</p>	<p><i>11. On or around 31 January 2022:</i></p> <p><i>a. You wrote a prescription for “Revolax Deep” (a type of dermal filler)</i></p> <p><i>ii. signed the prescription as Dentist A, when Dentist A was not the prescriber;</i></p> <p>Found proved.</p> <p>The Committee found this allegation at 11(a)(ii) proved for the same reasons given in respect of 11(a)(i) above. This included Dentist A’s evidence stating that</p>



	<p><i>"I can confirm that the signature on the prescription does not belong to me for the same reasons listed above".</i> The Committee also had regard to Miss Tilley's admission that she wrote this prescription using the credentials of Dentist A. The Committee was satisfied on the evidence before it that Miss Tilley signed the prescription as Dentist A.</p>
11(a)(iii)	<p><i>11. On or around 31 January 2022:</i></p> <p><i>a. You wrote a prescription for "Revolax Deep" (a type of dermal filler)</i></p> <p><i>iii. named Practice A as the prescriber's address, when Practice A was not the prescriber's address.</i></p> <p>Found proved.</p> <p>The Committee saw from the prescription in question that Practice A was named as the prescriber's address. It found this allegation proved for the same reasons given at 1(a)(iv), 3(a)(iii), 5(a)(iii) 7(a)(iv) 8(a)(iii) and 10(a)(iii) above. It was satisfied on all the evidence that Practice A was not the prescribing practice.</p>
11(b)	<p><i>11. On or around 31 January 2022:</i></p> <p><i>b. [You] Issued the prescription detailed in 11 (a) using Practice A's logo without Practice A's consent.</i></p> <p>Found proved.</p> <p>For the same reasons outlined in respect of 1(b) 3(b), 5(b) and 10(b) above. The Committee noted that Dentist B provided similar evidence in relation to the use of Practice A's logo, including that Miss Tilley was not given consent to use it.</p>
11(c)(i)	<p><i>11. On or around 31 January 2022:</i></p> <p><i>c. Your conduct in respect to 11ai, and/or 11aii, and/or 11aiii and/or 11b, was:</i></p> <p><i>i. misleading;</i></p> <p>Found proved in respect of 11(a)(i), 11(a)(ii), 11(a)(iii) and 11(b).</p> <p>For the same reasons given in respect of 2(i), 4(i), 6(i), 7(b)(i), 9(i) and 10(i) above. The Committee was satisfied on all the evidence that Miss Tilley's conduct in respect of the prescription for Revolax Deep dated 31 January 2022 was misleading.</p>
11(c)(ii)	<p><i>11. On or around 31 January 2022:</i></p>



	<p><i>c. Your conduct in respect to 11ai, and/or 11aii, and/or 11aiii and/or 11b, was:</i></p> <p><i>ii. dishonest because you knew you were making a false representation on the prescription.</i></p> <p>.Found proved in respect of 11(a)(i), 11(a)(ii), 11(a)(iii) and 11(b).</p> <p>For the same reasons given in respect of 2(ii), 4(ii), 6(ii), 7(b)(ii) 9(ii), and 10(ii) above. The Committee was satisfied that Miss Tilley’s admitted conduct in respect of falsely writing the prescription for Revolax Deep dated 31 January 2022 would be regarded as dishonest by the standards of ordinary decent people.</p>
Pharmacist A	
12	<p><i>12. On 2 February 2022 you informed Pharmacist A that you had obtained the prescriptions approximately a year ago from Dentist A and that you would fill in the dates on them.</i></p> <p>Found proved.</p> <p>In finding this allegation proved, the Committee had regard to Pharmacist A’s account of a telephone conversation she had with Miss Tilley on 2 February 2022, during which Pharmacist A asked Miss Tilley to clarify where she had obtained two of the prescriptions in question. Pharmacist A exhibited with her witness statement a contemporaneous email telephone note which is dated 2 February 2022 and timed at 16.28.</p> <p>The Committee accepted Pharmacist A’s account of the details of the telephone conversation she had with Miss Tilley, which is supported by the objective documentary evidence of the telephone note. The Committee was satisfied on the balance of probabilities that Miss Tilley informed Pharmacist A that she had obtained the prescriptions approximately a year ago from Dentist A and that she would fill in the dates on them.</p>
13(a)	<p><i>13. Your conduct in respect of 12 was:-</i></p> <p><i>a. misleading;</i></p> <p>Found proved.</p> <p>The Committee was satisfied that what Miss Tilley told Pharmacist A during their telephone conversation on 2 February 2022 was misleading. The Committee was satisfied that Miss Tilley acted to give the wrong impression to Pharmacist A that Dentist A had made out the prescriptions with the intention that she [Miss Tilley] simply filled out the relevant dates.</p>
13(b)	<p><i>13. Your conduct in respect of 12 was:-</i></p>



	<p><i>b. dishonest because you knew Dentist A had not issued you with these prescriptions.</i></p> <p>Found proved.</p> <p>On her own admission, Miss Tilley herself wrote the prescriptions and she did so falsely, using Dentist A’s credentials. Accordingly, the Committee was satisfied that ordinary decent people would find what Miss Tilley told Pharmacist A to be dishonest.</p>
14.	<p><i>14. On 2 February 2022 you informed Pharmacist A that in respect to the botulinum toxin prescription-only-medicines, you had only ever self-administered.</i></p> <p>Found proved.</p> <p>The Committee was satisfied from the evidence of Pharmacist A, including the contemporaneous email telephone note of 2 February 2022, that this allegation is proved. The Committee was satisfied on the balance of probabilities that Miss Tilley informed Pharmacist A that in respect to the botulinum toxin prescription-only-medicines, she had only ever self-administered.</p>
15(i)	<p><i>15. Your conduct in respect to allegation 14 was:</i></p> <p><i>i. misleading;</i></p> <p>Found proved.</p> <p>The Committee was satisfied that what Miss Tilley told Pharmacist A during their telephone conversation on 2 February 2022 about only ever self-administering botulinum toxin medication was misleading. Miss Tilley admitted in her self-referral to the GDC that she administered both botulinum toxin and dermal fillers to her family and friends. The Committee was therefore satisfied that what Miss Tilley said to Pharmacist A was incorrect and would have given the pharmacist the wrong impression.</p>
15(ii)	<p><i>15. Your conduct in respect to allegation 14 was:</i></p> <p><i>ii. dishonest because you had administered botulinum toxin to friends and family.</i></p> <p>Found proved.</p> <p>The Committee was satisfied that what Miss Tilley told Pharmacist A during their telephone conversation on 2 February 2022 about only ever self-administering botulinum toxin medication would be regarded as dishonest by the standards of ordinary decent people. Miss Tilley knew that this information was incorrect.</p>
Indemnity	
16.	<p><i>16. Between 18 April 2021 to 20 February 2022, you provided treatment for facial aesthetics without any or any adequate indemnity in place.</i></p>

	<p>Found proved.</p> <p>In finding this allegation proved, the Committee took into account Miss Tilley’s admission that she did not have any indemnity in place for the provision of facial aesthetics. It further noted the evidence provided in insurance policy schedule from Miss Tilley’s insurers, that she obtained retroactive cover on 18 January 2021 in respect of aesthetic treatments. Therefore, indicating that she had not had such cover previously.</p>
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38. We move to Stage Two.

Stage Two of the hearing – 31 July to 1 August 2024

39. The Committee’s task at this second stage of the hearing has been to determine whether the facts found proved amount to misconduct, and if so, whether Miss Tilley’s fitness to practise is currently impaired by reason of that misconduct. The Committee took into account that if it found current impairment, it would also need to determine what sanction, if any, to impose on Miss Tilley’s registration.

40. The Committee considered all the evidence presented to it at the fact-finding stage (Stage One), including the report prepared by the GDC’s expert witness, Dr Jennifer Ward. The Committee also considered the evidence of Miss Tilley’s Continuing Professional Development (CPD), which was included in the main hearing bundle for Stage One but is relevant to this stage.

41. The Committee further considered the evidence it received at this second stage of the hearing, which was a ‘Stage 2 Bundle’ containing Miss Tilley’s communications with the GDC about this case, including a letter dated 21 April 2023 sent on her behalf by her legal representatives at the time. The letter set out Miss Tilley’s observations to the GDC Case Examiners in relation to the then allegations.

42. The Committee took account of the submissions made by Mr Saad on behalf of the GDC in relation to misconduct, impairment, and sanction.

43. The Committee accepted the advice of the Legal Adviser. It bore in mind that its decisions were for its independent judgement. There is no burden or standard of proof at this stage of the proceedings.

Summary of the facts found proved

44. The facts found proved against Miss Tilley, all of which she admitted in her self-referral to the GDC in February 2022, relate to her dishonestly obtaining seven private prescriptions for botulinum toxin and dermal fillers over the period 7 December 2020 to 31 January 2022.

45. Miss Tilley falsified the prescriptions using the credentials of another dental professional, Dentist A, including forging his signature. Miss Tilley had worked with Dentist A at Practice A from September 2020 to January 2021.

46. Miss Tilley also used the logo of Practice A on a number of the prescriptions without the practice's consent.

47. In relation to two of the false prescriptions, Miss Tilley used the details of Patient A, a patient to whom she had provided aesthetic treatment in July 2019, to obtain medication when Patient A was not the intended recipient.

48. On 2 February 2022, when a pharmacist, Pharmacist A, sought clarification from Miss Tilley in relation to some of the prescriptions, Miss Tilley dishonestly asserted to Pharmacist A that she had obtained the prescriptions approximately a year ago from Dentist A, and that she [Miss Tilley] would fill in the dates on them. Shortly afterwards, during the same conversation, Miss Tilley admitted to Pharmacist A that she had falsified the prescriptions but was further dishonest in telling Pharmacist A that she had only ever administered the botulinum toxin prescription-only medicines to herself. Miss Tilley subsequently admitted to also using the botulinum toxin medicines on her family and friends.

49. In addition, the Committee found proved that between 18 April 2021 and 20 February 2022, Miss Tilley provided treatment for facial aesthetics without adequate indemnity in place. This was also a matter that she admitted in her self-referral to the GDC, and the Committee was provided with evidence of the retroactive indemnity cover Miss Tilley obtained.

Summary of the submissions made by the GDC

50. At the start of his submissions at this stage, Mr Saad informed the Committee, in accordance with Rule 20(1)(a) of the Rules, that Miss Tilley has no fitness to practise history.

51. In relation to this current case, Mr Saad submitted that there is no statutory definition of misconduct. He referred the Committee to the legal principles relating to misconduct, as set out in case law, including the view that 'misconduct' is a word of general effect, involving some act or omission which falls short of what would be proper in the circumstances.

52. Mr Saad highlighted that the standard of propriety may often be found by reference to the rules and standards ordinarily required to be followed, which in this case would be the GDC's '*Standards for the Dental Team*' (effective from September 2013) (*the GDC Standards*). Mr Saad invited the Committee to take into account the GDC Standards that he considered to be applicable in this case, including those relating to honesty and integrity.

53. Mr Saad also drew the Committee's attention to relevant sections of the GDC's '*Guidance for the Practice Committees including Indicative Sanctions Guidance*' (effective from October 2016; last

revised in December 2020) ('the ISG Guidance'). These included the sections relating to dishonesty, indemnity and cosmetic treatment.

54. With regard to the facts found proved, Mr Saad submitted that Miss Tilley's dishonesty was sophisticated. He highlighted her use of the credentials of another registered dental professional, including the forging of his signature, and her use of Practice A's logo. Mr Saad submitted that there is no evidence before the Committee of any recognition by Miss Tilley of the potential consequences of her dishonesty for Dentist A and Dentist B, the owner of Practice A. Further, Mr Saad submitted, that Miss Tilley has not shown any insight into her use of Patient A's details to obtain false prescriptions.

55. Mr Saad also asked the Committee to take into account the lies that Miss Tilley told Pharmacist A. He stated that even when Miss Tilley told Pharmacist A that she was '*coming clean*', and that the prescriptions had nothing to do with Dentist A, she still sought to minimise her conduct by dishonestly stating that she had only ever self-administered the botulinum toxin medication, when in fact she had used that medication to also treat her family and friends.

56. Mr Saad submitted that the facts found proved in this case amount to misconduct. He invited the Committee, in reaching its decision, to have regard to the Dr Ward's expert opinion in her report that Miss Tilley's conduct fell far below the expected standard.

57. Mr Saad also submitted that Miss Tilley's fitness to practise is currently impaired. He drew the Committee's attention to relevant legal authorities on impairment which, he said, require the Committee to consider the need to protect the public, but also the need to uphold proper standards of conduct and behaviour, so as to maintain public confidence in the dental profession.

58. In relation to public protection, it was Mr Saad's submission that there is scant evidence of remediation before the Committee. He submitted that the totality of the remediation evidence was two sentences within the letter written on Ms Tilley's behalf to the GDC Case Examiners in April 2023, which references her CPD. Mr Saad submitted that of the two CPD certificates before the Committee, only one is relevant, namely a course on professionalism in dentistry. However, Mr Saad noted the absence of any evidence of Miss Tilley's reflection on that CPD.

59. Mr Saad also highlighted the information before the Committee that Miss Tilley has now expressed her lack of desire to return to the dental profession. He noted that she had stated in her written observations to the GDC Case Examiners she wished to have the opportunity to work in dentistry again, but her position appears to have changed.

60. It was Mr Saad's submission that Miss Tilley has offered no reason for her dishonest conduct, has provided no evidence of her recognition of how fundamental honesty is to the dental profession, and has offered no apology to the individuals that she has brought into this matter through no fault of

their own. Mr Saad stated that, taking these factors into account, together with Miss Tilley's lack of engagement with this PCC hearing, her fitness to practise is impaired on public protection grounds.

61. Mr Saad submitted that for the same reasons, Miss Tilley's fitness to practise is impaired on wider public interest grounds. He submitted that the Committee may conclude that her actions have brought the dental profession into disrepute, particularly her putting the registrations of other dental professionals at risk by using their credentials. Mr Saad also submitted that Miss Tilley's behaviour is damaging for the integrity of the prescription system.

62. In relation to sanction, Mr Saad submitted that, in light of Miss Tilley's serious and persistent dishonesty, the most appropriate and proportionate sanction is one of erasure.

Decision on misconduct

63. The Committee considered whether the facts found proved in this case amount to misconduct. It took into account that a finding of misconduct in the regulatory context requires a serious falling short of the professional standards expected of a registered dental professional.

64. The Committee had regard to its findings and to the GDC Standards, and it was satisfied that the following paragraphs are clearly engaged in this case:

1.3 You must be honest and act with integrity.

1.3.1 You must justify the trust that patients, the public and your colleagues place in you by always acting honestly and fairly in your dealings with them...

1.3.2 You must make sure you do not bring the profession into disrepute.

1.8 You must have appropriate arrangements in place for patients to seek compensation if they have suffered harm.

65. Miss Tilley's dishonesty was premeditated, repeated and sustained over a period of some 15 months. It involved her systematic approach in using the credentials of another registered dental professional, including forging his signature, and using the logo of Dentist B's practice, Practice A, without his consent. Miss Tilley also used the details of a former patient, Patient A, to write two of the false prescriptions.

66. Additionally, when Miss Tilley was contacted to provide clarification in relation to a number of the prescriptions, she persisted in her dishonesty during the conversation with Pharmacist A. This included Miss Tilley's dishonest assertion that Dentist A had provided her with pre-prepared prescriptions a year previously, as well as her concealment of the fact that she had been using botulinum toxin prescription only medication to treat her family and friends, as well as herself.

67. The Committee took into account the potential for serious harm arising from Miss Tilley's dishonesty. She was prescribing medications that she was not qualified to prescribe, for use on herself and others. Furthermore, she was providing aesthetic treatments in the absence of appropriate indemnity insurance. Whilst the Committee took into account the evidence in relation to the retroactive indemnity cover Miss Tilley obtained, such cover does not satisfy the GDC Standards or the expectations of conduct for dental professionals.

68. Honesty and integrity are fundamental tenets of the dental profession, and in the Committee's view Miss Tilley's behaviour, as highlighted in this case, represents a serious departure from the above GDC Standards. In reaching its conclusion, the Committee also had regard to the opinion of Dr Ward that Miss Tilley's conduct fell far below the expected standard.

69. The Committee was satisfied, having taken all the evidence into account, that the facts found proved amount to misconduct.

Decision on impairment

70. The Committee next considered whether Miss Tilley's fitness to practise is currently impaired by reason of her misconduct. It had regard to the over-arching objective of the GDC, which is: the protection, promotion and maintenance of the health, safety, and well-being of the public; the promotion and maintenance of public confidence in the dental profession; and the promotion and maintenance of proper professional standards and conduct for the members of the dental profession.

71. In the Committee's view, its findings of repetitive, systematic and premeditated dishonesty on Miss Tilley's part are indicative of a serious attitudinal failing. It bore in mind, however, that when considering the issue of impairment, it should consider fitness to practise as of today. In this regard, the Committee took into account that failings of an attitudinal nature are difficult to remedy, although not impossible address. The Committee therefore considered what evidence of remediation it had before in relation to Miss Tilley's wrongdoing.

72. The Committee took into account that Miss Tilley referred herself to the GDC and that she offered an apology in respect of her actions. However, the Committee also took into account that her self-referral and her apology occurred after Pharmacist A had made clear that they had a professional duty to report suspected dishonest prescriptions to relevant regulators. In the circumstances, the Committee was not satisfied that Miss Tilley's self-referral and apology were motivated by insight and remorse.

73. In fact, the Committee found there to be little or no evidence before it that Miss Tilley has acknowledged and understood the seriousness of her dishonesty, including that she placed the registrations of two dental colleagues at risk and risked the reputation of Practice A. There is also no evidence that Miss Tilley recognises the seriousness of what she did in using Patient A's details on false prescriptions. Nor has the Committee received any evidence of Miss Tilley's insight into the

potential harm that could have arisen from treating herself and others with falsely obtaining medications. Furthermore, Miss Tilley has not engaged with this hearing, and other than minimal evidence of CPD, namely the completion of two courses, one of which is not relevant, there is no evidence of any remediation.

74. In view of the lack of evidence in relation to Miss Tilley's insight, remorse and remediation, the Committee concluded that there is a risk of repetition in this case. It had regard to the potential harm that could be caused to members of the public by a registrant who wilfully and dishonestly disregards the safety protocols relating to prescription medications and who provides aesthetic treatments without appropriate indemnity. Having had regard to this risk, the Committee determined that a finding of impairment is necessary for the protection of the public.

75. The Committee also determined that a finding of impairment is required in the wider public interest, given the serious, persistent and systematic nature of Miss Tilley's dishonesty. Her actions breached fundamental tenets of the dental profession, and there is little or no evidence to indicate that she appreciates the gravity of her misconduct. The Committee considered that public confidence in the dental profession would be seriously undermined if a finding of impairment were not made in the circumstances of this case. It also considered that a finding of impairment is necessary to promote and maintain proper professional standards and standards of conduct and behaviour.

76. Accordingly, the Committee determined that Miss Tilley's fitness to practise is currently impaired by reason of her misconduct.

Decision on sanction

77. The Committee next considered what sanction, if any, to impose on Miss Tilley's registration. It noted that the purpose of a sanction is not to be punitive, although it may have that effect, but to protect the public and to uphold the wider public interest. In reaching its decision, the Committee had regard to the ISG Guidance. It applied the principle of proportionality, balancing the public interest with Miss Tilley's interests.

78. In deciding on the appropriate sanction, the Committee considered the issue of mitigating and aggravating factors. In mitigation, it took into account the following:

- That Miss Tilley is of previous good character, in that she has no fitness to practise history.
- That she reported herself to the GDC and has offered an apology in respect of her actions, although the context in which both were made raises questions about her level of insight and remorse.

79. The Committee identified the following aggravating factors in this case:

- The risk of harm arising from Miss Tilley prescribing medicines that she is not qualified to prescribe.
- Her dishonesty.
- That her misconduct was premeditated.
- Breach of trust, in that Miss Tilley falsified the prescriptions using the credentials of a professional colleague, the logo of Practice A, and on two occasions used the details of Patient A.
- That her misconduct was repeated and sustained over a period of time.
- She demonstrated a blatant or wilful disregard of the role of the GDC and the systems regulating the profession, particularly in relation to the regulator's statutory duty to protect the public, by failing to adhere to the safety protocols relating to prescription medications.
- She made attempts to cover up her wrongdoing by being dishonest with Pharmacist A.
- Lack of insight; the Committee has received no evidence to suggest that Miss Tilley would do anything differently in future or how she would prevent a recurrence.

80. Taking all the above factors into account, the Committee considered the available sanctions. It started with the least restrictive, as it is required to do.

81. The Committee noted that it was open to it to conclude this case without taking any action in relation to Miss Tilley's registration. It decided, however, that such a course would be wholly inappropriate, given the seriousness of its findings and the identified risk to the public and the wider public interest. The Committee determined that some form of sanction is required in this case.

82. The Committee next considered whether to issue Miss Tilley with a reprimand. It had regard to paragraph 6.9 of the ISG guidance which sets out the factors for when a reprimand may be suitable. The Committee concluded that none of the listed factors apply. It further noted from paragraph 6.7 that *"A reprimand is the lowest sanction which can be applied and may therefore be appropriate where the misconduct or level of performance is at the lower end of the spectrum. A reprimand does not impose requirements on a registrant's practice and should therefore only be used in cases where he or she is fit to continue practising without restrictions. A reprimand might be appropriate if the circumstances do not pose a risk to patients or the public which requires rehabilitation or restriction of practice"*. In the Committee's view this is not such a case. It therefore determined that a reprimand would not be proportionate or adequate to manage the identified risk to the public or to satisfy the wider public interest.

83. The Committee next considered whether to impose a conditions of practice order on Miss Tilley's registration. It noted however, that conditions may be suitable when there are discrete areas of a registrant's practice that are problematic. The Committee considered that it could not formulate any workable or meaningful conditions to address Miss Tilley's dishonesty, which is a concern that is

attitudinal in nature. The Committee also took into account Miss Tilley's current lack of engagement with the fitness to practise process and it was not reassured that she would comply with conditions even if they could be imposed. Accordingly, the Committee determined that a conditions of practice order would not be appropriate or proportionate to safeguard the public or to address the wider public interest considerations in this case.

84. The Committee went on to consider whether to suspend Miss Tilley's registration for a specified period up to a maximum of 12 months. It had regard to paragraph 6.28 of the ISG Guidance, which states that:

"Suspension is appropriate for more serious cases and may be appropriate when all or some of the following factors are present (this list is not exhaustive):

- *there is evidence of repetition of the behaviour;*
- *the Registrant has not shown insight and/or poses a significant risk of repeating the behaviour;*
- *patients' interests would be insufficiently protected by a lesser sanction;*
- *public confidence in the profession would be insufficiently protected by a lesser sanction;*
- *there is no evidence of harmful deep-seated personality or professional attitudinal problems (which might make erasure the appropriate order)".*

85. The Committee considered the above factors from paragraph 6.28, and it was satisfied that the first four factors are applicable. However, it was the view of the Committee, taking into account its findings against Miss Tilley, that there is evidence of harmful deep-seated personality and professional attitudinal problems in this case. In addition to the grave nature of her dishonesty, Miss Tilley has demonstrated little or no insight or remorse into her misconduct and the potential consequences of her actions, including for the individuals that she has involved in this case through no fault of their own. She has provided very limited evidence of remediation and has failed to engage with this hearing in any meaningful way. For all these reasons, the Committee concluded that a period of suspension would not be sufficient to satisfy the wider public interest, particularly the upholding of public confidence in the dental profession.

86. In reaching its conclusion, the Committee had regard to paragraph 6.34 of the ISG Guidance which deals with erasure. It took into account that the sanction of *"erasure will be appropriate when the behaviour is fundamentally incompatible with being a dental professional"*. The Committee considered that following factors applicable to erasure are present in Miss Tilley's case:

- Serious departure(s) from the relevant professional standards.
- A continuing risk of serious harm to patients or other persons has been identified.

- Abuse of a position of trust.
- Serious dishonesty, particularly where persistent or covered up.
- A persistent lack of insight into the seriousness of actions or their consequences.

87. In all the circumstances, the Committee concluded that Miss Tilley's conduct, as outlined in this case, is incompatible with continued GDC registration. Accordingly, the Committee determined that the only appropriate and proportionate sanction is that of erasure.

88. Unless Miss Tilley exercises her right of appeal, her name will be erased from the Register of Dental Care Professionals, 28 days from the date that this Committee's direction is deemed to have been served upon her.

89. The Committee now invites submissions from Mr Saad as to whether an immediate order of suspension should be imposed on Miss Tilley's registration pending the taking effect of its substantive direction for erasure.

Decision on an immediate order – 1 August 2024

90. Having determined that Miss Tilley's fitness to practise is impaired, and having imposed a substantive sanction of erasure, the interim order currently in place on her registration is hereby revoked.

91. In considering whether to impose an immediate order of suspension on Miss Tilley's registration, pending the taking effect of its direction for erasure, the Committee took account of Mr Saad's submission that such an order should be imposed. He referred the Committee to the relevant guidance contained at paragraphs 6.35 to 6.38 of the ISG Guidance which deal with immediate orders. Mr Saad submitted that in light of the Committee's finding of impairment on both public protection and wider public interest grounds, an immediate order should be imposed.

92. The Committee accepted the advice of the Legal Adviser, who drew its attention to its power to impose an immediate order under section 36U of the *Dentists Act 1984 (as amended)*.

93. The Committee determined that the imposition of an immediate order of suspension on Miss Tilley's registration is necessary for the protection of the public and is otherwise in the public interest.

94. The Committee has identified a risk of repetition in the case and consequently an ongoing risk of harm to the public. It took into account that in the absence of an immediate order, Miss Tilley could return to unrestricted clinical practice during the 28-day appeal period, or for potentially longer, in the event that she appeals the Committee's substantive decision. An immediate order is therefore necessary to protect the public.

95. The Committee was also satisfied that an immediate order is required in the wider public interest. It has determined that Miss Tilley's conduct is incompatible with continued GDC registration, and it therefore considered that immediate action is warranted in this case to maintain public confidence in the dental profession and to uphold proper professional standards.

96. The effect of the foregoing substantive determination and this order is that Miss Tilley's registration will be suspended to cover the appeal period. Unless she exercises her right of appeal, the substantive direction for erasure will take effect 28 days from the date of deemed service.

97. Should Miss Tilley exercise her right of appeal, this immediate order will remain in place until the resolution of the appeal.

98. That concludes this determination.