

ON PAPERS**Registrations Appeal Hearing
CPD Appeal Hearing****14 July 2026****Name:** TOLEFREE, Matthew**Registration number:** 302236**Case number:** CAS-215599-P0F9H0

General Dental Council: Needa Bhatti, ILAS**Registrant:** Unrepresented

Outcome: Appeal dismissed

Committee members: Anthony Mole (Chair, lay member)
Sarah Benton (Dentist member)
Stephanie Carter (Dental Care Professional member)**Legal adviser:** Matthew Corrie**Committee Secretary:** Sara Page

1. This is an appeal meeting before the Registration Appeals Committee (RAC). The appeal is against the decision of the Registrar of the General Dental Council (GDC) to erase Mr Tolefree from the Register for apparent non-compliance with the statutory Continuing Professional Development (CPD) requirements. The hearing is being held in accordance with the terms of the *General Dental Council (Registration Appeals) Rules Order of Council 2006* ('the Registration Appeal Rules'), pursuant to Schedule 2A of the *Dentists Act 1984* (as amended) ('the Act').
2. The hearing was conducted remotely via Microsoft Teams in line with current GDC practice. Neither party was present at today's hearing, following notification from the GDC that the appeal was to be conducted on the papers.

Preliminary matter

Decision to conduct the appeal in the absence of Mr Tolefree and on the papers

3. Neither party was present at today's meeting. The Committee noted that conducting the appeal on the papers is the default position of the GDC unless an appellant requests an oral hearing. Having considered the documents provided, the Committee was satisfied that Mr Tolefree had made no such request.
4. Notification of this appeal was sent to Mr Tolefree by Recorded Delivery and secure email on 12 June 2026 in accordance with Rule 5 of the Registration Appeal Rules.
5. The Committee was satisfied that it was appropriate to consider today's appeal in the absence of either party and on the papers.

Decision and reasons on the appeal

Background

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

Summary

10. The GDC's case in support of its decision was summarised as follows:

11. Mr Tolefree first registered with the General Dental Council (“the Council”) as a dentist on 3 August 2022. Therefore, in accordance with Rule 1 as set out above, Mr Tolefree’s current CPD cycle began on 1 January 2023 and will end on 31 December 2027.
12. On 30 October 2025, the Council sent an email reminder to Mr Tolefree’s registered email address. This reminder notified Mr Tolefree that his 2025 CPD cycle year was coming to an end and reminded him that he was required to submit his CPD statement, detailing how many CPD hours he had completed during that year, by 28 January 2026. The email also reminded Mr Tolefree of the need to complete a minimum of 10 hours of CPD during each period of two consecutive years, including any two-year period spanning over more than one CPD cycle. Mr Tolefree was warned that if he failed to submit his CPD statement by this date his registration may be put at risk.
13. On 10 November 2025, the Council sent Mr Tolefree an Annual Renewal Notice letter by post to his registered address. The Annual Renewal Notice is designed to remind registrants that their registration with the Council is due for renewal, of the need to pay their annual retention fee and make their indemnity declaration and of the need to submit their CPD statement. Mr Tolefree was also reminded in this notice that he was required to submit his CPD statement by 28 January 2026. This letter also reminded Mr Tolefree of the need to complete a minimum of ten hours of CPD during each period of two consecutive years.
14. Between 26 November 2025 and 28 January 2026, the Council sent various reminders to Mr Tolefree’s via various methods of communication to Mr Tolefree regarding his CPD requirements.
15. On 20 February 2026, the Council sent Mr Tolefree a notice under Rule 6 of the 2017 Rules to his registered address by recorded delivery. Mr Tolefree was informed that by not complying with his CPD requirements, his registration may be at risk. The notice stated that, although Mr Tolefree had submitted a CPD statement to the Council, he had not declared enough hours to meet the requirement to complete a minimum of ten hours of CPD over two consecutive years. Mr Tolefree was informed that he had previously submitted a CPD statement for 2024 detailing three verifiable CPD hours and then submitted a statement for 2025 with six verifiable CPD hours. Mr Tolefree was informed that he needed to submit a compliant CPD record covering 1 January 2024 to 31 December 2025 by the deadline of 20 March 2026. As such, Mr Tolefree was informed that he now needed to submit his CPD record, including his Person Development Plan (“PDP”), CPD log and evidence of completed CPD, in order to demonstrate his compliance with the CPD requirements. Mr Tolefree was warned that if the Council did not receive a response to the notice or if his response was unsatisfactory, he may be erased from the dentists register. Mr Tolefree was also asked to inform the Council if there were any reasons or exceptional circumstances, together with supporting evidence, that had meant he was unable to submit a compliant statement for the relevant period.
16. On 3 March 2026, the Council received a letter from Mr Tolefree along with his CPD record via post. The letter set out the following:
 - a) Mr Tolefree apologised for the inconvenience caused and thanked the Council for its consideration of the matter. He fully appreciated the importance of maintaining an accurate and up to date CPD record which ultimately impacted on patient care.
 - b) Mr Tolefree acknowledged that his CPD record was not updated correctly and did not meet the minimum required number of CPD hours. This was

caused by an administrative error for which he took full responsibility - he had mistaken the Council's deadline to be 28 January rather than 31 December.

- c) Mr Tolefree had reviewed his PDP and taken steps to ensure he completed and recorded his CPD in a timely manner in the future.
- d) Mr Tolefree's Practice Principals were aware of the steps he was taking and had agreed to provide references attesting to their confidence in his commitment to CPD if required.
- e) Mr Tolefree was committed to upholding the highest professional standards and ensuring compliance with his CPD obligations.

17. On 10 March 2026, the Council's Operations Officer acknowledged receipt of Mr Tolefree's letter and correspondence sent via post. The Council explained that his CPD record would now be assessed and to await further communication from the Council.

18. On 1 April 2026, the Council sent a Rule 8 Notice to Mr Tolefree's registered address by recorded delivery. On 2 April 2026, a copy of the notice was also sent to Mr Tolefree by email. This notice confirmed that Mr Tolefree's evidence demonstrated completion of zero hours of verifiable CPD between 1 January 2024 – 31 December 2025. This was not sufficient to meet his CPD requirements to complete a minimum of 10 hours of verifiable CPD for every two consecutive CPD year period. His CPD was deficient as:

- *2x Course Kings LTD Certificates dated 22 November 2024 & 12 December 2025 - did not include aims, objectives and learning content.*
- *4x Agilio Certificates dated 2026 - rejected as they were all dated outside the requested cycle years.*
- *Colgate enhanced CPD programme Certificate dated 2026 - rejected as it was dated outside the requested cycle years.*

19. Further, the letter also set out that Mr Tolefree had not provided any evidence of exceptional personal circumstances which may have prevented him from completing his CPD as required. As a result of Mr Tolefree's failure to provide a compliant CPD record, the Registrar had made the decision to remove his name from the dentists register for non-compliance with the 2017 Rules. Mr Tolefree was notified that unless an appeal was submitted, the Registrar's decision would take effect on 1 May 2026.

Notice of Appeal

20. On 16 April 2026, the Council received an email from Mr Tolefree attaching a Notice of Appeal ("NOA") in which he confirmed that he wished to appeal the decision to remove him from the register. On 20 April 2026, the Council received a further copy of Mr Tolefree's NOA and also his CPD evidence via post.

21. On 21 April 2026, Mr Tolefree's NOA was reviewed by the Council's Operations Officer. A copy of this assessment appears at page 182 and sets out why Mr Tolefree was deemed to be non-compliant with his CPD requirements:

- *The registrant is 4 verifiable CPD hours outstanding.*
- *We are not able to accept 27x NHS England certificates dated 2023 as they are out of cycle for 2024-2025.*

- *We are not able to accept 11x Agilio Certificates dated 2026 as they are out of cycle for 2024-2025.*
- *We are not able to accept Update Webinars Certificate dated 2026 as it is out of cycle for 2024-2025.*
- *We are not able to accept BDA Certificate dated 2023 as it is out of cycle for 2024-2025.*
- *We are not able to accept 18x Colgate Certificate as they are out of cycle for 2024-2025.”*

22. This assessment found that Mr Tolefree had demonstrated that he had completed six hours of verifiable CPD for the period 1 January 2024 – 31 December 2025. Mr Tolefree was therefore required to provide a further four hours of CPD evidence for this period.

Submissions

23. In its written submissions, the GDC submitted that Mr Tolefree has failed to demonstrate that he has completed the minimum requirement to undertake 10 hours of verifiable CPD during the period 1 January 2024 – 31 December 2025.
24. The GDC noted that Mr Tolefree has provided CPD documentation with his NOA for CPD completed outside of the period 1 January 2024 – 31 December 2025. However, the CPD undertaken outside of the relevant period cannot be counted. Only CPD undertaken between 1 January 2024 – 31 December 2025 can be considered by the Registrar when assessing compliance under Rule 2(5) of the 2017 Rules which requires a minimum of 10 hours of CPD to be undertaken in each two-year period.
25. The GDC acknowledged the steps Mr Tolefree states he has taken to ensure compliance with his CPD in the future. However, the GDC respectfully submits that Mr Tolefree was sent reminders as early as 30 October 2025 drawing his attention to the requirement that dentists must complete a minimum of 10 hours of CPD in each two-year period.
26. The GDC is of the view that Mr Tolefree had completed six verifiable CPD hours between 1 January 2024 – 31 December 2025 and has a shortfall of four hours. Therefore, Mr Tolefree failed to meet the requirement that dentists complete a minimum of ten verifiable CPD hours in each two-year period as per Rule 2(5) of the 2017 Rules.
27. In Mr Tolefree's NOA, he apologised for the inconvenience caused and thanked the Council for its consideration of the matter. He fully appreciated the importance of maintaining an accurate and up to date CPD record which ultimately impacted on patient care.
28. Mr Tolefree acknowledged that his CPD record was not updated correctly and did not meet the minimum required number of CPD hours. This was caused by an administrative error for which he took full responsibility - he had mistaken the Council's deadline to be 28 January rather than 31 December.
29. Mr Tolefree had sent the Council a copy of his PDP, character reference, relevant CPD certificates and an Activity Log for his current CPD cycle 2023-2027 and in which he had completed 100 hours of CPD.
30. Mr Tolefree had reviewed his PDP and taken steps to ensure he completed and recorded his CPD in a timely manner in the future.

31. Mr Tolefree's Practice Principals were aware of the steps he was taking and had agreed to provide references attesting to their confidence in his commitment to CPD if required. He stated that he was committed to upholding the highest professional standards and ensuring compliance with his CPD obligations.

Committee's decision and reasons

32. The Committee had regard to the documentary evidence provided today and took account of the written submissions made on behalf of the GDC and those made by Mr Tolefree in his NOA. It heard and accepted the advice of the Legal Adviser and the principles to be considered in coming to its decision.
33. The Committee noted that on 9 March 2026, Mr Tolefree had notified the GDC that it appeared the Rule 6 notice had been sent to his previous address, and that upon discovering this, he had updated his contact details on the Register. The Committee bore in mind that all registrants are responsible for keeping their contact details up to date on the Register. All further documentation have been sent to Mr Tolefree's updated address as it appears on the Register.
34. The Committee took into account that the relevant CPD cycle being considered in this appeal is 1 January 2024 – 31 December 2025. In its consideration of the information provided, the Committee acknowledged that on 3 March 2026, Mr Tolefree provided certification for two Course Kings LTD Certificates dated 22 November 2024 and 12 December 2025, amounting to three hours for each course. However, these certificates were rejected by the GDC as they did not include aims, objectives and learning content, as required pursuant to Rule (2)(6)(a)(i) of the CPD Rules. He re-submitted these on 20 April 2026, with the addition of the relevant aims, objectives and learning content included. These were then accepted by the GDC.
35. The Committee was satisfied that Mr Tolefree has provided verifiable evidence of six hours of CPD, leaving a deficit of four outstanding hours. He has provided the relevant documentation requested of him in compliance with his CPD requirements, including his Activity Log and Personal Development Plan.
36. In its consideration of Mr Tolefree's NOA, the Committee referred to '*Guidance on the Registrar's Discretion to Erase for CPD Non-Compliance (February 2024)*'. Mr Tolefree had apologised for his misunderstanding of the requirements and the deadline but had not invited the Committee to take into account any exceptional personal circumstances which were beyond his control that had prevented him from complying with his CPD requirements.
37. Accordingly, the appeal is dismissed. The Committee had consideration of its overarching objectives, namely the protection of the public and public interest in ensuring dental professionals comply with all requirements of the enhanced CPD regime. The Committee wished to remind Mr Tolefree that it is open to him to apply for the restoration of his name to the Register upon completion of the required number of CPD hours.
38. Unless Mr Tolefree exercises his right of appeal to the County Court (if based in England or Wales) or the sheriff in whose sherriffdom his address is located (if based in Scotland), in accordance with paragraph 6 of Schedule 2A of the Act, the erasure decision will take effect upon the expiry of the 28-day appeal period. It will then be open to Mr Tolfree to apply for the restoration of his name if he meets the CPD and other requirements for restoration.
39. This will be confirmed to Mr Tolefree in writing in accordance with the Act.

40. That concludes this determination.