

ON PAPERS

Registrations Appeal Hearing CPD Appeal Hearing

2 April 2026

Name: Mahdey, Reem
Registration number: 300995
Case number: CAS- 213280-C0M4B6

General Dental Council: Instructed by Needa Bhatti, ILAS

Registrant: Unrepresented

Outcome: Appeal dismissed

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

Legal adviser: Alastair McFarlane

Committee Secretary: Jamie Barge

1. This is an appeal meeting before the Registration Appeals Committee (RAC). The appeal is against the decision of the Registrar of the General Dental Council (GDC) to erase Miss Mahdey 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 4A of the *Dentists Act 1984* (as amended) ('the Act').
2. The meeting was conducted remotely via Microsoft Teams in line with current GDC practice. Neither party was present at today's meeting, following notification from the GDC that the appeal was to be conducted on the papers.

Preliminary matter

Decision to conduct the appeal in the absence of Miss Mahdey and on the papers

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

Decision and reasons on the appeal

Background

6. The General Dental Council (Continuing Professional Development) (Dentists and Dental Care Professionals) Rules 2017 ('the CPD Rules') set out the CPD requirements placed on DCP registrants as of 1 August 2018, and the steps that the GDC shall take in respect of registrants' compliance and non-compliance with those requirements.
7. The CPD Rules came into force on the 1 January 2018 and took effect in respect of dental care professionals on 1 August 2018.
8. In accordance with Rule 1, a 'CPD cycle' means, in respect of a dental care professional, a period of five years beginning on 1 August following the date the dental care professional is first registered and each subsequent period of five years. A 'CPD year' means, in respect of a dental care professional, a period of 12 months beginning on 1 August in any calendar year.
9. Miss Mahdey appealed against the Registrar's decision that despite her CPD being non-compliant because she failed to provide a compliant CPD record demonstrating that she had met the minimum requirement for the period of 1 August 2023 and 31 July 2025, and asked the Registrar to consider exceptional circumstances.

Summary

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

Miss Mahdey first registered with the General Dental Council ('the Council') as a dental nurse on 10 June 2022. Therefore, in accordance with Rule 1 as set out above, Miss Mahdey's first CPD cycle began on 1 August 2022 and will end on 31 July 2027.

On 22 May 2025, the Council sent an email reminder to Miss Mahdey's registered email address. This reminder, notified Miss Mahdey that her 2024-2025 CPD cycle year was coming to an end and reminded her that she was required to submit her CPD statement, detailing how many CPD hours she had completed during that year, by 28 August 2025. The email also reminded Miss Mahdey of the need to complete a minimum of 10 hours of CPD during each period of two consecutive years, including any two-year period spanning over more than one CPD cycle. Miss Mahdey was notified that if she failed to submit her CPD statement by this date her registration may be put at risk.

On 10 June 2025, the Council sent Miss Mahdey an Annual Renewal Notice letter by post to her registered address. The Annual Renewal Notice is designed to remind registrants that their registration with the Council is due for renewal, of the need to pay their annual retention fee and make their indemnity declaration and of the need to make their CPD statement. Miss Mahdey was also reminded in this notice that she was required to submit her CPD statement by 28 August 2025. This letter also reminded Miss Mahdey of the need to complete a minimum of 10 hours of CPD for every two consecutive CPD years of registration.

On 12 June 2025, 7 July 2025, 18 July 2025 and 5 August 2025, the Council sent an email reminders to Miss Mahdey's registered email address.

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

Rule 6 notice

On 25 September 2025, the Council sent Miss Mahdey a notice under Rule 6 of the 2017 Rules to her registered address by recorded delivery. The notice stated that, although Miss Mahdey had submitted a CPD statement to the Council, she had not declared enough hours to meet the requirement to complete a minimum of 10 hours of CPD over two consecutive years. Miss Mahdey was informed that she had previously submitted a CPD statement for 2023-2024 detailing zero verifiable CPD hours and then submitted a statement for 2024-2025 with four verifiable CPD hours. Miss Mahdey was informed that she needed to submit a compliant CPD record covering 1 August 2023 to 31 July 2025 by the deadline of 23 October 2025. She was notified that if the Council did not receive a response to the notice or if following a review of her response it was considered that her CPD requirements had not been met, she may be erased from the dental care professionals register.

Correspondence with Miss Mahdey

On 23 October 2025 the Council received a telephone call from Miss Mahdey, with an enquiry relating to her CPD declaration. On 24 October 2025 the Council received Miss Mahdey's CPD record

Rule 8 notice

On 5 November 2025, the Council sent a Rule 8 Notice to Miss Mahdey's registered address by recorded delivery. This notice confirmed that Miss Mahdey's evidence demonstrated completion of zero hours of verifiable CPD between 1 August 2023 – 31 July 2024 and eight hours of verifiable CPD between 1 August 2024 – 31 July 2025. This was not sufficient to meet her CPD requirements to complete a minimum of 10 hours of verifiable CPD for every two consecutive CPD year period. Her CPD was deficient as:

- Miss Mahdey was outstanding 2 verifiable CPD hours.
- The Tear Trough Filler Course certificate dated 11 February 2024 was not relevant to the dental care profession.
- The Microneedling (Collagen Induction Therapy) certificate dated 6 July 2024 was not relevant to the dental care profession.

Miss Mahdey had also not provided any evidence of exceptional personal circumstances which may have prevented her from completing her CPD as required. As a result, the Registrar had made the decision to remove her name from the dental care professionals register for non-compliance with the 2017 Rules. Miss Mahdey was notified that unless an appeal was submitted, the Registrar's decision would take effect on 5 December 2025.

Notice of Appeal

On 25 November 2025, the Council received an email from Miss Mahdey including a Notice of Appeal ('NOA'). The reasons for Miss Mahdey's appeal, as set out in the NOA, can be summarised as follows:

- a. Miss Mahdey had believed, at the time of submission, that the CPD she had undertaken for an aesthetic course (two hours) was an acceptable form of CPD. She maintained that the course was relevant to her role as a dental professional as it enhanced key clinical skills and core dental competencies. Miss Mahdey understood that the Council accepted any CPD relevant to a practitioner's professional practice. Miss Mahdey had also completed an aesthetic course previously which the Council had accepted. Miss Mahdey had always aimed to choose CPD which strengthened her capabilities as a dental nurse – recently she had decided to undertake a dental basic life support training course rather than a standard similar course.
- b. Miss Mahdey had acted immediately upon becoming aware that her CPD was deficient and completed additional CPD – these related to essential areas of dental nursing and reflected her intention to stay up to date with professional standards.

- c. Miss Mahdey had completed a reflective log demonstrating her understanding of the CPD undertaken and also to show that she understood the importance of CPD and her plan to manage her CPD more effectively in the future.
- d. Miss Mahdey took responsibility for the misunderstanding which was an honest oversight rather than a lack of engagement or commitment to her obligations. She had an unblemished professional record and was committed to upholding professional standards.
- e. Miss Mahdey enjoyed her role as a dental nurse. She was dedicated to her professional progression and had applied to study dental hygiene. She was committed to furthering her education and contributing to patient care and the profession.
- f. Miss Mahdey asked that her further evidence be taken into consideration for her appeal. She was dedicated to meeting her CPD requirements in the future.

On 27 November 2025, Miss Mahdey's NOA and CPD evidence was reviewed by the Council's Senior Operations Officer. As of 27 November 2025, Miss Mahdey had demonstrated that she had completed eight hours of verifiable CPD hours for the period 1 August 2023 – 31 July 2025. Miss Mahdey was therefore required to provide a further two hours of CPD evidence for this period.

Submissions

11. In its written submissions, the Council's position is that Miss Mahdey's CPD is non-compliant because she has failed to demonstrate that she has completed the minimum requirement to undertake 10 hours of verifiable CPD during the period 1 August 2023 to 31 July 2025.
12. The Council notes that Miss Mahdey has provided CPD documentation with her NOA for CPD completed in November 2025. However, the CPD undertaken outside of the relevant period cannot be counted. Only CPD undertaken between 1 August 2023 – 31 July 2025 can be considered by the Registrar when assessing compliance under Rule 2(5) of the 2017 Rules.
13. The Council notes that Miss Mahdey has also provided certain CPD certificates which do not appear to be relevant to the dental care profession. As set out by Rule 2(4) of the 2017 Rules only CPD which is relevant to the field of practice in which the practitioner practised during that CPD cycle can be accepted by the Registrar when assessing compliance under the 2017 Rules.
14. As set out above, there is no power to waive these provisions.
15. The Council is of the view that Miss Mahdey has completed eight verifiable CPD hours between 1 August 2023 and 31 July 2025 and has a shortfall of two hours. Therefore, Miss Mahdey failed to meet the requirement that dental care professionals complete a minimum of 10 verifiable CPD hours in each two-year period as per Rule 2(5) of the 2017 Rules.
16. It is open to Miss Mahdey to apply to restore her registration at any time following this appeal.

Committee's decision

17. The Committee had regard to the documentary evidence provided today and took account of the written submissions made on behalf of the GDC and those made by Miss Mahdey in her Notice of Appeal. It heard and accepted the advice of the Legal Adviser.

18. The Committee first calculated the number of hours of CPD which Miss Mahdey was required to undertake. The Committee was in agreement with the Registrar (and it is not in dispute on appeal) that Miss Mahdey was required to complete at least 10 hours of verifiable CPD during her two-year CPD cycle. She is short of 2 verifiable hours. The Committee was of the view that despite her personal circumstances, it considered that she could have completed this CPD prior to the deadline of 31 July 2025.
19. The Committee was satisfied that Miss Mahdey had not complied with this requirement.
20. The Committee has taken full account of the circumstances Miss Mahdey experienced. It noted the number of reminders that were sent by both email and text to Miss Mahdey. The Committee determined that it was her responsibility to be familiar with the CPD requirements. Having carefully considered Miss Mahdey's personal circumstances, the Committee did not consider these to amount to exceptional circumstances that would have prevented her from completing her CPD requirements in the statutory time frame. The Committee also noted that Miss Mahdey provided some CPD certificates which in their view were not relevant. In addition, she had been working and had ample opportunities to meet her CPD requirements. As of today, Miss Mahdey had completed 8 hours of verifiable CPD in the requisite period. The Committee is satisfied that Miss Mahdey was non-compliant with her CPD requirements.
21. The Committee was satisfied that the GDC has complied with the 2017 Rules in dealing with Miss Mahdey's CPD requirements including the serving of the statutory notices on her.
22. The Committee also balanced the interests of Miss Mahdey against the wider public interest and to the public expectation that registered dental professionals will meet their statutory CPD requirements in order to remain on the Register. The Committee was satisfied that the decision was proportionate, and this appeal therefore fails.
23. Accordingly, the appeal is dismissed. The Committee wished to remind Miss Mahdey that it is open to her to apply for the restoration of her name to the Register upon completion of the required number of CPD hours.
24. This will be confirmed to Miss Mahdey in writing.
25. That concludes this determination.