

**Professional Conduct Committee
Initial Hearing**

28 July to 1 August 2025

Name: GAMBLE, Bernadette

Registration number: 162759

Case number: CAS-209249-D8R0G6

General Dental Council: Natalie Bird, Counsel
Instructed by Sarah Barker of IHLPS

Registrant: Present on 30 July 2025 only
Represented by Michael Standing, Counsel
Instructed by Ros Foster of Hill Dickinson

Fitness to practise: Impaired by reason of misconduct

Outcome: Reprimand

Committee members: Gill Mullen (Chair, lay member)
Joshua Kelly (Dental Care Professional member)
Harpreet Ark (Dentist member)

Legal adviser: Paul Kilcoyne

Committee Secretary: Paul Carson

CHARGE (as amended on 29 July 2025)

GAMBLE, Bernadette Mary, a Dental Nurse, verified competency in Dental Nursing, is summoned to appear before the Professional Conduct Committee on 28 July 2025 for an inquiry into the following charge:

“That being registered as a dental care professional:

1. AMENDED TO READ: On the following dates, you caused and/or allowed the publication of advertisements via your business social media page(s) which offered Ozempic to clients as a weight loss product and which were in contravention of Regulation 284(1) of the Human Medicines Regulations 2012 and/or the rules and guidelines set by the Advertising Standards Agency:
 - a. 28 August 2022;
 - b. 29 October 2022;
 - c. 7 December 2022;
 - d. 31 December 2022; and/or
 - e. 7 January 2023.
2. [withdrawn]
3. AMENDED TO READ: On the following dates, you caused and/or allowed the publication of advertisements via your business social media page(s) for Botox treatment which were in contravention of Regulation 284(1) of the Human Medicines Regulations 2012 and/or the rules and guidelines set by the Advertising Standards Agency:
 - a. 28 June 2021;
 - b. 4 July 2021;
 - c. 6 July 2021;
 - d. 31 August 2021;
 - e. 3 November 2021;
 - f. 4 November 2021;
 - g. 12 November 2021;
 - h. 24 March 2022;
 - i. 19 August 2022;
 - j. 14 October 2022;
 - k. 15 October 2022;
 - l. 26 October 2022;
 - m. May 2023; and/or
 - n. 20 August 2022.

4. [withdrawn]
5. [withdrawn]
6. On the following dates, you have stated and/or allowed to be stated on your business social media page(s) that you were a “GDC Aesthetic Nurse” or words to that effect:
 - a. 21 June 2022; and/or
 - b. 31 December 2022.
7. On or around 10 October 2023, you have stated and/or allowed to be stated on your business social media page(s) that you and/or your practice was “QCQ registered”.
8. Your actions in relation to allegations [withdrawn] 6 and/or 7 were:
 - a. Misleading; and/or
 - b. Dishonest.

AND by reason of the matters alleged above, your fitness to practise is impaired by reason of your misconduct.”

1. The allegations against Ms Gamble relate to social media advertisements for Ozempic and Botox treatments which she caused or allowed to be published in contravention of Regulation 284(1) of the Human Medicines Regulations 2012 and/or the rules and guidelines set by the Advertising Standards Agency. It is also alleged that she acted in a way which was misleading and dishonest by describing herself on her business social media pages as a “GDC Aesthetic Nurse” and as being “QCQ registered”.

Procedural progress

2. This hearing was conducted remotely using Microsoft Teams and was scheduled to commence on 28 July 2025 with a time estimate of 5 days. Ms Gamble was not present, as a close relative for whom she is the sole carer had been admitted to hospital. The Committee therefore adjourned until the following morning whilst Ms Gamble’s legal team awaited instructions from her regarding her attendance at this hearing.
3. On 29 July 2025 the Committee convened a Preliminary Meeting under Rule 51 of the General Dental Council (Fitness to Practise) Rules 2006 (the ‘Rules’) to decide the conduct of the hearing and also to determine an application under Rule 18 to amend the charge set out in the notification of hearing.
4. Mr Standing, Counsel for Ms Gamble, informed the Committee that she wished to attend the hearing to give evidence on 30 July 2025 but otherwise requested to be excused so that she could remain with her close relative in hospital. In light of agreed proposed amendments to the charge and her admissions to the underlying facts (the only matter in dispute being whether her conduct was dishonest), no other witnesses were to be called as part of the factual inquiry and Ms Gamble would remain legally represented throughout the hearing by Counsel. Ms Gamble did not want the hearing to be postponed to a future date because of the delay this would cause to the determination of the charges against her.
5. Ms Bird, Counsel for the General Dental Council (GDC), submitted that the GDC had no objection to this proposed conduct of the hearing.
6. Given Ms Gamble’s personal circumstances, her wish for the hearing to proceed and the fact that she would remain legally represented throughout the hearing with no other live witnesses to be called as part of the factual inquiry, the Committee agreed to allow her to attend on 30 July 2025 for the purposes of giving evidence and to otherwise excuse her attendance.
7. Ms Bird applied under Rule 19 of the Rules for the charge set out in the notification of hearing to be amended so as to delete charges 2, 4 and 5 with consequential

amendments to the wording of the remaining charges. These amendments were pursued by the GDC following a joint meeting of the expert witnesses instructed in this case.

8. Charge 2 alleged that Ms Gamble had caused or permitted the publication of two advertisements over social media which “*mentioned purported medical benefits of Botox treatment*”. Charge 4 alleged this and other advertisements offering Ozempic as a weight loss product “*concerned matters which were outside the scope of your practice.*”
9. In their joint expert report dated 13 Jul 2025, Dr Ravinder Varaich and Dr Abhijit Pal did not express a clear view on whether these matters, which do not constitute the practice of dentistry, would necessarily be beyond the Scope of Practice of a Dental Nurse. In relation to Botox treatment, the agreed opinion of the experts was that: “*It was agreed that, should the Committee determine that dental nurses were permitted to administer Botox at the material time under the supervision of an independent prescriber, then advertising Botox would not be considered outside their scope of practice*”.
10. In light of the inconclusive expert opinion, the GDC did not seek to pursue charge 4.
11. Charge 1 alleged that Ms Gamble had caused or permitted the publication of social media advertisements on five occasions which offered Ozempic to clients as a weight loss product “*with no mention as to any requirement for a pre-treatment assessment by a doctor*”. The GDC did not seek to pursue this aspect of charge 1 in light of the agreed expert opinion and therefore applied for that wording to be deleted.
12. Charge 5 alleged that the advertisements at charges 1, 2 and/or 3 were in contravention of Regulation 284(1) of the Human Medicines Regulations 2012 and/or the rules and guidelines set by the Advertising Standards Agency. The GDC’s application was to withdraw this charge and to instead streamline the charges by incorporating this wording directly into charges 1 and 3 (with charge 2 to be withdrawn as already stated).
13. Ms Bird’s application to amend the charge was unopposed by Mr Standing.
14. The Committee acceded to the application. It was satisfied that the amendments reflected the state of the expert evidence and that no injustice would be caused to either party in allowing the amendments.

The factual inquiry

15. The factual inquiry commenced on 30 July 2025 with Ms Gamble formally admitted each of the remaining charges (charges 1(a)-(e), 3(a)-(n), 6(a)-(b), 7 and 8(a)) except for charge 8(b) which alleges dishonesty. The Committee accepted those admissions and found the corresponding charges proved.

16. The Committee received the witness statements dated 10 July 2025 and 21 March 2025 from Jovi Gomes and Pooja Shah respectively, both Paralegals at the GDC whose statements were production statements given during the course of their employment and producing, among other things, screenshots of the social media advertisements in question.
17. In addition to their joint expert report, the Committee also received an expert report dated 18 March 2025 from Dr. Varaich, instructed by the GDC; and an expert report dated 30 June 2025 from Dr. Pal, instructed on behalf of Ms Gamble.
18. The Committee received a witness statement dated 4 July 2025 from Ms Gamble and heard oral evidence from her.
19. The Committee allowed three supportive character references regarding Ms Gamble to be admitted as hearsay, without the authors of each reference being required to give evidence. It was unclear whether the authors of two of the references were aware of the dishonesty charge and no attempts had been made by Ms Gamble to secure the attendance of those witnesses at this hearing. Their statements also did not go directly to the question of Ms Gamble's honesty but referred to wider matters of personal mitigation. However, the Committee determined that these references, which were relatively brief, would not be the sole or decisive evidence in relation to the dishonesty charge and the question of what weight, if any, the Committee should be attached to such statements would be a matter for the Committee to decide when deliberating on the entirety of the evidence in relation to the question of dishonesty. The Committee was therefore satisfied that there would be no unfairness or injustice to the GDC in allowing these potentially relevant references to be admitted as hearsay as part of the factual inquiry.
20. The Committee heard the submissions made by both Counsel.
21. The Committee accepted the advice of the Legal Adviser.
22. The burden is on the GDC to prove each allegation on the balance of probabilities.

Findings

23. Ms Gamble has been registered with the GDC as a Dental Nurse since October 2008 with no other fitness to practise history.
24. From around 2021 Ms Gamble set up her own part-time business providing a range of aesthetic treatments, including Botox treatment. She promoted her business over the Facebook and Instagram social media platforms. On five occasions between August 2022 and January 2023 she caused and/or permitted social media adverts which offered Ozempic to clients as a weight loss product. This was in contravention of Regulation

284(1) of the Human Medicines Regulations 2012 and the rules and guidelines set by the Advertising Standards Agency as Ozempic is also a prescription only medication and, as such, cannot be advertised to the public.

25. On fourteen occasions between June 2021 and August 2022 Ms Gamble caused and/or permitted social media adverts for Botox treatment. This was in contravention of Regulation 284(1) of the Human Medicines Regulations 2012 and the rules and guidelines set by the Advertising Standards Agency as Botox is also a prescription only medication and, as such, cannot be advertised to the public.

26. The Committee accepted the uncontested evidence of Dr. Varaich that Ozempic is a prescription only medicine and that:

'21. Being a prescription only medicine, it can only be prescribed by doctors, nurse prescribers, pharmacists that have undergone additional prescribing training and dentists.

22. The risks associated with Ozempic most commonly (which may affect 1 in 10 people) include problems with the digestive system, such as diarrhea, vomiting and nausea (feeling sick). These are mild or moderate in severity and of short duration. Serious worsening of diabetic retinopathy (damage to the retina) is common (it may affect 1 in 10 people).

23. The UK Code of Non-broadcast advertising and Direct Promotional Marketing (CAP Code) is enforced by the Advertising Standards Authority (ASA), the independent advertising regulator. The Medicines and Healthcare products Regulatory Agency (MHRA) is the UK statutory regulator for medicines, medical devices and blood components for transfusion.

24. Ozempic self-administered pen devices, also known as "Ozempic skinny pens" refer to the method of administration of the drug Semaglutide.

25. Prescription only medicines (POMs) cannot be advertised to the public. Advertisements for POMs break Rule 12.12. of the CAP Code and the Human Medicines Regulations 2012 (HMRs).

26. Advertisements for these POMs claim people can lose specific amounts of weight within a certain time, which is prohibited (CAP Code; Rule 13.9).

27. Relevant CAP Code rules:

1.3 Marketing communications must be prepared with a sense of responsibility to consumers and society.

12.12 Prescription-only medicines or prescription-only medical treatments may not be advertised to the public.

13.9 Marketing communications must not contain claims that people can lose precise amounts of weight within a stated period or, except for marketing communications for surgical clinics, establishments and the like that comply with rule 12.3, that weight or fat can be lost from specific parts of the body.

28. The relevant legislation:

The Human Medicines Regulation 2012 prohibit the publishing of an “advertisement that is likely to lead to the use of a prescription only medicine”, as laid out in Chapter 2, Advertising to the public, Regulation 284(1)3.

29. An example enforcement notice for the advertisement of prescription-only weight-loss treatments is included in Appendix 2.

30. The CAP Code notes that Botox is a prescription-only medicine (POM), and as such, cannot be advertised to the public (rule 12.12). The Advertising Standards Agency considers almost every reference to Botox and other botulinum toxin products as promoting a POM and therefore a clear breach of rule 12.12.

31. The prohibition includes price lists.’

27. On 21 June 2022 and 31 December 2022 Ms Gamble stated and/or allowed to be stated on her business social media page(s) that she was a “GDC Aesthetic Nurse”. On or around 10 October 2023, she stated and/or allowed to be stated on her business social media page(s) that she and/or her practice was “QCQ registered”. These statements were misleading as there is no GDC title of “Aesthetic Nurse” neither does the GDC regulate or accredit the aesthetic treatments which Ms Gamble was offering. Ms Gamble also was not registered with the Care Quality Commission (CQC) to which the misspelled reference “QCQ” appears to refer.

28. In her evidence to the Committee, Ms Gamble explained that these social media posts, and the social media advertisements which are the subject of charges 1 and 3, were made by her daughter who was then in her early twenties and who was trying to help Ms Gamble promote her business. Ms Gamble explained that she was unaware of the content of these posts. She explained that she lacked IT skills to post on social media and had therefore delegated the advertising of her business to her daughter, who she said was acting in good faith in making these posts and would not have understood that the use of the title GDC Aesthetic Nurse and reference to being CQC registered would be misleading.

29. Ms Gamble's evidence was that she had not yet informed her daughter the posts she had made has resulted in these regulatory proceedings. Ms Gamble explained that she did not want to embarrass or upset her daughter by informing her of these proceedings, as she was only trying to help by making the posts. It was not therefore Ms Gamble's intention that her daughter should be called to give evidence to the Committee to corroborate her account. The Committee drew no adverse inference from this.
30. The Committee gave careful consideration to Ms Gamble's written and oral evidence. The Committee found Ms Gamble to be frank, open and straightforward in her evidence. It did not appear to the Committee that Ms Gamble was trying to shirk her professional responsibilities or that she was being evasive. Rather, it appeared that she did not appear to appreciate the formality and seriousness of these regulatory proceedings and also that she was being protective of her daughter. The Committee accepted that it was entirely plausible that her daughter had made the social media posts on her behalf and that, due to a lack of IT skills, Ms Gamble would not have fully understand how to review or edit those posts. The question was whether and to what extent Ms Gamble was consciously aware of the two references to "GDC Aesthetic Nurse" and to the single reference to "QCQ" registration being posted in reference to her and/or her business on social media.
31. The Committee accepted Ms Gamble's evidence that she was unaware of these references. In her closing submissions, Ms Bird submitted that, when advertising Ms Gamble's services, the daughter was unlikely to have known the full range of aesthetic treatments which Ms Gamble had trained in and that there was therefore likely to have been conscious input from Ms Gamble into the content of the adverts and other social media posts. The Committee rejected this submission. The evidence before the Committee was of a close mother-daughter relationship. It is plausible that the daughter was familiar with and was interested in the aesthetic treatments which her mother was offering. She had used her own initiative by researching other aesthetic businesses' social media accounts to advertise services on her mother's behalf, exercising her own judgment on the form and content of the social media posts. This is reinforced by the obvious "QCQ" spelling error, which is unlikely to have been made by Ms Gamble herself and which would have been immediately spotted by her had she been aware of the content of that social media post. As Ms Gamble stated in evidence, the spelling error made her look stupid and is not something she would have done.
32. Having regard to the totality of the evidence, the Committee determined that the GDC has not discharged its burden of proving that it is more likely than not that Ms Gamble was consciously aware of the two references to "GDC Aesthetic Nurse" and to the single reference to "QCQ" registration being posted in reference to her and/or her business on social media. She had delegated responsibility for her advertising over social media to her daughter and was unaware of the precise detail of what as being stated about her. In those circumstances, the social media posts which she caused or permitted to be made

cannot be said to be dishonest by the standards or ordinary decent people as she was not consciously aware of the particular statements in question.

33. Accordingly, the Committee found charge 8(b) not proved.

34. I will now announce the Committee's findings in relation to each head of charge:

9. **AMENDED TO READ:** On the following dates, you caused and/or allowed the publication of advertisements via your business social media page(s) which offered Ozempic to clients as a weight loss product and which were in contravention of Regulation 284(1) of the Human Medicines Regulations 2012 and/or the rules and guidelines set by the Advertising Standards Agency:

- a. 28 August 2022;
- b. 29 October 2022;
- c. 7 December 2022;
- d. 31 December 2022; and/or
- e. 7 January 2023.

Admitted and found proved.

10. [withdrawn]

11. **AMENDED TO READ:** On the following dates, you caused and/or allowed the publication of advertisements via your business social media page(s) for Botox treatment which were in contravention of Regulation 284(1) of the Human Medicines Regulations 2012 and/or the rules and guidelines set by the Advertising Standards Agency:

- a. 28 June 2021;
- b. 4 July 2021;
- c. 6 July 2021;
- d. 31 August 2021;
- e. 3 November 2021;
- f. 4 November 2021;
- g. 12 November 2021;
- h. 24 March 2022;
- i. 19 August 2022;
- j. 14 October 2022;
- k. 15 October 2022;
- l. 26 October 2022;
- m. May 2023; and/or



n. 20 August 2022.

Admitted and found proved.

12. [withdrawn]

13. [withdrawn]

14. On the following dates, you have stated and/or allowed to be stated on your business social media page(s) that you were a “GDC Aesthetic Nurse” or words to that effect:

- a. 21 June 2022; and/or
- b. 31 December 2022.

Admitted and found proved.

15. On or around 10 October 2023, you have stated and/or allowed to be stated on your business social media page(s) that you and/or your practice was “QCQ registered”.

Admitted and found proved.

16. Your actions in relation to allegations [withdrawn] 6 and/or 7 were:
a. Misleading; and/or

Admitted and found proved.

b. Dishonest.

Not proved.

35. We move to Stage Two.

Stage Two 31 July to 1 August 2025

36. At this stage of the proceedings the Committee shall decide whether the facts found proved, or any of them, amount to misconduct and, if so, whether Ms Gamble’s fitness to practise as a Dental Nurse is currently impaired by reason of that misconduct. If the Committee were to find current impairment, it shall then decide on what action, if any, to take in respect of her registration.

37. The Committee received from Mr Standing a bundle of Ms Gamble's recent Continuing Professional Development (CPD) activity.
38. The Committee had regard to the submissions made by both Counsel.
39. Ms Bird submitted that the facts found proved amount to misconduct and that Ms Gamble's fitness to practise is currently impaired by reason of that misconduct.
40. As to sanction, Ms Bird submitted that Ms Gamble's remediation remains incomplete and that the appropriate outcome would be a period of conditional registration for six months with a review and with conditions requiring her to formulate a Personal Development Plan and to produce a reflective statement. In the alternative, if the Committee were to find that Ms Gamble's remediation is complete, Ms Bird's submission was that a reprimand should be issued in order to meet the public interest.
41. Mr Standing submitted that the facts found proved do not meet the threshold for misconduct. If the Committee were to be against him on that, he submitted that the declaratory effect of a public finding of misconduct would in itself be sufficient to meet the public interest.
42. The Committee accepted the advice of the Legal Adviser.
43. The Committee had regard to the *Guidance for the Practice Committees, including Indicative Sanctions Guidance* (October 2016, last revised December 2020).
44. Misconduct is a serious departure from the standards reasonably expected of a dental professional. It can be characterised as conduct which fellow members of the profession would regard as 'deplorable'. In assessing whether the facts found proved amount to misconduct, the Committee had regard to the following principles from the GDC's *Standards for the Dental Team* (September 2013):
 - 1.3.3 You must make sure that any advertising, promotional material or other information that you produce is accurate and not misleading, and complies with the GDC's guidance on ethical advertising.
 - 1.9 You must find out about laws and regulations that affect your work and follow them
45. The Committee first considered its findings under charges 1 and 3. Ms Gamble caused and/or allowed the publication of numerous advertisements via her business social media pages in which she advertised Botox treatment and offered Ozempic to clients as a weight loss product. These advertisements were in contravention of Regulation 284(1) of the Human Medicines Regulations 2012 and the rules and guidelines set by the Advertising Standards Agency, as Ozempic and Botox are prescription only medicines

which cannot be advertised to the public. The advertisements also made specific weight loss claims in respect of Ozempic, which is not allowed.

46. The Committee accepted that Ms Gamble did not herself moderate the content of the advertisements. She had instead caused or allowed their publication by delegating the advertising of her business over social media to her daughter. The Committee had regard to the above quoted standards and to the GDC's corresponding guidance on ethical advertising. It was unclear to the Committee whether these were in fact engaged in relation to the advertisements in question. This is because the advertisements do not relate to Ms Gamble's work as a dental care professional. They instead relate to aesthetic treatments which do not involve the practice of dentistry and are not subject to regulation by the GDC.
47. Whether or not the GDC standards are engaged, the Committee did not consider the contraventions of Regulation 284(1) of the Human Medicines Regulations 2012 and the rules and guidelines set by the Advertising Standards Agency to be so serious as to meet the threshold of misconduct. Ms Gamble did not deliberately breach those regulations and the advertisements in question under charges 1 and 3 were not intended to mislead the public and did not expose the public to a risk of harm. Whilst there had been a breach of the laws and regulations which apply to the making of such advertisements, the Committee, having regard to context and all the circumstances, did not consider the breach to be so serious as to amount to misconduct.
48. The Committee next considered its findings under charges 6, 7 and 8(a). On 21 June 2022 and 31 December 2022 Ms Gamble stated and/or allowed to be stated on her business social media page(s) that she was a "GDC Aesthetic Nurse". On or around 10 October 2023, she stated and/or allowed to be stated on her business social media page(s) that she and/or her practice was "QCQ registered". These statements were misleading as there is no GDC title of "Aesthetic Nurse" neither does the GDC regulate or accredit the aesthetic treatments which Ms Gamble was offering. Ms Gamble also was not registered with the Care Quality Commission (CQC) to which the misspelled reference "QCQ" appears to refer.
49. The Committee accepted that Ms Gamble was not herself aware of the statements but had instead delegated the advertising of her business on social media to her daughter. Ms Gamble's conduct in allowing such statements to be made was therefore not deliberately misleading or dishonest. Such statements would, however, have been misleading to the public. The statements are likely to have caused the reader to have placed a greater a level of trust and confidence in Ms Gamble in relation to the aesthetic services she was advertising. The use of the title "GDC Aesthetic Nurse" is likely to cause the reader to conclude that Ms Gamble's training, qualification and experience had been accredited by the GDC and that she was providing aesthetic services under its regulation. However, the training, qualification and experience (if any) Ms Gamble had in relation to

the aesthetic services would not have been accredited by the GDC neither were those services subject to its regulation.

50. Moreover, there is no such title as “GDC Aesthetic Nurse”. The Committee determined that Ms Gamble’s misleading use of that title, even if not deliberate, is therefore a serious matter and is in clear breach of the professional standards expected of her by the GDC. Likewise, the reference to being “QCQ registered” was likely to have misled the reader, in principle at least, into concluding that she was also registered with the Care Quality Commission and that the aesthetic services she was providing and/or her business was subject to its regulation. This would again have caused the reader to have placed greater trust and confidence in her in relation to the aesthetic treatments she was advertising. The Committee determined that Ms Gamble’s misleading claim of being “QCQ registered”, even if not deliberate, is therefore a serious matter and is in clear breach of the professional standards expected of her by the GDC.
51. Accordingly, the Committee determined that the facts found proved under charges 6, 7 and 8(a) are so serious as to amount to misconduct.

Impairment

52. The next consideration for the Committee was whether Ms Gamble’s fitness to practise as a Dental Nurse is currently impaired by reason of that misconduct. The committee considered whether Ms Gamble’s misconduct is remediable, whether it had been remedied and the risk of repetition. The committee also had regard to the wider public interest, which includes the need to uphold and declare appropriate standards of conduct and behaviour, so as to maintain public confidence in the profession and in this regulatory process.
53. Whilst the Committee has not heard from Ms Gamble at this stage of the proceedings and has received no reflective statement from her, it had regard to the written and oral evidence which she gave as part of the factual inquiry and also to the three character references which were admitted as hearsay as part of that inquiry. The Committee accepted that Ms Gamble’s actions were not deliberate but were instead the result of failing to exercise sufficient oversight over the statements which were being made on her behalf by her daughter over social media. The Committee accepted that Ms Gamble’s lack of IT skills would have made it more difficult for her to moderate and edit the social media content. The Committee also accepted that Ms Gamble was frank, reflective and straightforward in her oral evidence to the Committee. She accepted full responsibility and is genuinely remorseful for the misleading statements which she had allowed to be made.
54. Ms Gamble’s misconduct is remediable in the Committee’s judgement. There has been remediation insofar as she admits that the statements in question were misleading and that she takes full responsibility for them. She has removed the Instagram post making

reference to being “QCQ registered”, albeit the Committee noted it would not in any event have been in her interests to keep that statement upon becoming aware of the spelling mistake.

55. Ms Gamble’s evidence to the Committee was that she had attempted to remove the two Facebook posts which refer to her as being a “GDC Aesthetic Nurse” but has been unable to do so as she had lost the password for the Facebook account. Accordingly, the posts making misleading use of this title continue to be published on her business pages. Ms Gamble indicated that she had contacted Facebook over this issue but she provided no further detail to the Committee and provided no written records showing any attempts to regain access to the Facebook account and, in any event, to have the posts deleted or the account deactivated.
56. During her oral evidence to the Committee, it also transpired that Ms Gamble had never read the GDC’s standards. She explained to the Committee that she relied upon her dental practice employer to provide appropriate guidance along with her experience and learning throughout her career, and no concerns had ever been raised.
57. The Committee had regard to the steps Ms Gamble states she has taken to avoid a repetition of her misconduct. She no longer delegates her business social media activity to her daughter. She has also sought advice and support from Ms G. Hyland, whose character reference dated 1 July 2025 states:

“...My involvement with Bernie’s business has been informal and based on friendship. Over the past year, I have supported her with content strategy and assisted in the management of her social media accounts, specifically focusing on ensuring that post content aligns with UK advertising regulations. Drawing on my background of over a decade in pharmaceutical marketing, I have provided clear guidance on relevant frameworks, including the ABPI Code of Practice and ASA guidelines, to support Bernie in understanding and applying compliant communication practices.

Due to the nature of my involvement as a friend, I do not approve or oversee posts or stories published by Bernie or her daughter. My role has been purely advisory, and I am not employed by Bernie. However, I am confident Bernie has developed a solid understanding of the regulatory framework and has shown a clear eagerness to continue her learning and development in this area.”

58. In the Committee’s judgment, Ms Gamble is genuinely remorseful and, in practical terms, is unlikely to repeat the same misconduct. However, the provision of a reflective statement from her as part of these proceedings would have assisted the Committee in assessing her insight. With regard to her CPD bundle, this consists only of activity completed online on 11 June 2025. The activities in question were not targeted to the issues raised in these proceedings and there is in any event no written reflection by Ms

Gamble on her learning, if any, from each activity and how she would embed such learning in her practice. There is no record before the Committee of any wider CPD activity beyond that which was undertaken online on 11 June 2025.

59. Whilst the Committee does not identify there to be a real risk of harm to the public given the relatively narrow scope of Ms Gamble's misconduct and the low risk of repetition, the Committee determined that a finding of impairment is necessary in the public interest in order to mark the seriousness of Ms Gamble's misconduct. By allowing misleading statements to be published on her business social media pages she risked bringing the reputation of the profession into disrepute.

Sanction

60. The Committee next considered what action, if any, to take in respect of Ms Gamble's registration. The purpose of the sanction is not to be punitive, although it may have that effect, but to protect the public and the wider public interest. The Committee had regard to the aggravating and mitigating features present in this case.

61. The aggravating features include a breach of trust by allowing misleading statements to be made on the business social media pages, which would have caused the reader to place a greater level of trust and confidence in her as a practitioner and in her business. Whilst not blatant or wilful, there has been a disregard for the role of the GDC and the systems governing the profession given that Ms Gamble did not take the care to ensure that the statements which were being published on her business social media were not misleading. She also shows only developing insight at this stage.

62. In mitigation, the Committee recognised that Ms Gamble experienced a series of difficult personal circumstances at around the time of her misconduct. She has no other fitness to practise history and there is no evidence of any other concerns raised since the event. She is genuinely remorseful and has apologised. She made full admissions to all the charges which the Committee found proved. Her misleading conduct was not deliberate and she accepts full responsibility for it. She has taken some remedial steps in the form of seeking the support and advice of a friend who has expertise in social media advertising and complying with relevant advertising codes of practice.

63. The Committee also noted the three positive character references in support of Ms Gamble. However, it could only attach limited weight to two of them given that it was unclear to what extent the authors were aware of the full scope of the misconduct alleged against her.

64. The Committee considered sanction in ascending order of severity.

65. To conclude this case with no further action would be an unusual outcome and would do nothing to meet the public interest in the Committee's judgment.
66. The Committee next considered whether to conclude this case with a reprimand. In considering the sufficiency of a reprimand the Committee also had regard to conditional registration, with particular regard to the conditions proposed by the GDC. The Committee determined that a reprimand would be the sufficient and proportionate outcome in all the circumstances. The scope of Ms Gamble's misconduct is relatively narrow and is unlikely to be repeated. Whilst her insight is still developing, she is genuinely remorseful and does accept full responsibility. The Committee considered that conditions of practice might serve to require Ms Gamble to engage in further remediation but determined that this would be disproportionate to the limited extent of her misconduct. In the Committee's judgement, a reprimand would be sufficient to mark the seriousness of that conduct and maintain public confidence in the profession. The Committee considered that conditions would not be workable and would be punitive, given that they would disproportionality impose restrictions on Ms Gamble's general practice as a Dental Nurse.
67. Accordingly, the Committee directs that Ms Gamble be reprimanded in respect of misconduct.
68. That concludes the case.