

**ON PAPERS****Registrations Appeal Hearing  
CPD Appeal Hearing****22 April 2025****Name:** WOODS, Elizabeth**Registration number:** 179638**Case number:** CAS-209488-D6X2X6

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**General Dental Council:** Instructed by Amrit Sagoo, ILAS**Registrant:** Unrepresented

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**Outcome:** Appeal dismissed

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**Committee members:** Kerry McKevitt (Chair, lay member)  
Helen Baker (Dentist member)  
Christopher Parker (Dental Care Professional member)**Legal adviser:** Alexander Coleman**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 Mrs Woods 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 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 matters**

#### **Decision to conduct the appeal in the absence of Mrs Woods 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 Mrs Woods had made no such request.
4. Notification of this appeal was sent to Mrs Woods by Recorded Delivery and secure email on 5 February 2025 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 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. Mrs Woods appealed against the Registrar's decision that her CPD is non-compliant because she failed to provide a compliant CPD record demonstrating that she had met the minimum requirement for the period 1 August 2022 – 31 July 2024.

#### **Summary**

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

Mrs Woods first registered with the General Dental Council (“the Council”) as a dental care professional, with the title dental nurse, on 21 August 2009. Therefore, in accordance with Rule 1 as set out above, Mrs Woods’s current CPD cycle began on 1 August 2020 and will end on 31 July 2025.

On 22 May 2024, the Council sent an email reminder to Mrs Woods’ registered email address. This reminder notified Mrs Woods that her CPD 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 2024. Mrs Woods was advised that if she did not submit a compliant statement before the deadline, her registration may be put at risk.

On 11 June 2024, the Council also sent Mrs Woods an Annual Renewal Notice letter. 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. Mrs Woods was also reminded in this notice that she was required to submit her CPD statement by 28 August 2024. It was stated that Mrs Woods would need to have completed at least ten hours of CPD over the last two years.

Between 12 June and 28 August 2024, the Council sent numerous reminders to Mrs Woods regarding her CPD requirements.

#### Rule 6 notice

On 25 September 2024, the Council sent a notice under Rule 6 to Mrs Woods, stating that, although she had submitted a CPD statement to the Council, she had not declared enough hours to meet the requirement to complete a minimum of ten hours of CPD over two consecutive years. It was noted that she had submitted an annual CPD statement of two verifiable hours for the 2022-2023 CPD year and an annual CPD statement of six verifiable hours for the 2023-2024 CPD year. The notice stated that if Mrs Woods wished to retain her registration, she should submit her CPD record to the Registrar by 23 October 2024 in order to demonstrate that she had met the requirement. Mrs Woods was informed that if the Council did not receive a response to the notice or if her response was unsatisfactory, she may be erased from the dental care professionals register. Mrs Woods was given details of what documentary evidence was required and the contact details of who to contact should she require further explanation.

The Notice 6 also stated that, in the event the Registrant was unable to make a compliant CPD statement, she was to provide her reasons as to why and explain whether there were any exceptional, personal circumstances. Any reasons would be considered when deciding whether to take any further action.

#### Correspondence with the GDC

On 18 October 2024 the Council received a letter from Mrs Woods enclosing her Personal Development Plan and copies of all her CPD from 1 August 2022 – July 2024. Mrs Woods stated that ‘*with regret*’ the Council would note that there was a shortfall in the number of completed CPD hours. Mrs Woods explained that she did attend a seven hour implant course but was unable to obtain a copy of the CPD certificate.

Mrs Woods also set out that she had experienced huge personal difficulty in the 2022-2023 period.

Mrs Woods explained that she had been working in dentistry for 20+ years and had always kept up to date with her CPD. Whilst she endeavoured to make up the shortfall she accepted the CPD she completed in August 2024 would not count towards the 2023-2024 CPD year. Mrs Woods asked the Council to consider her personal circumstances as exceptional circumstances and there are no reasons as to why she might not comply with her CPD requirements going forward.

The Registrar considered the content of Mrs Woods' letter and applied the Council's Guidance on the Registrar's Discretion to Erase for CPD Non-Compliance. As part of that consideration the Registrar noted the following:

- *The events described were not exceptional personal circumstances beyond her control; and*
- *Notwithstanding her circumstances, she had been able to continue working as a dental professional.*

#### Rule 8 notice

On 5 November 2024 the Council sent a Rule 8 notice to Mrs Woods confirming that she had failed to provide a compliant CPD record demonstrating that she had met the minimum requirement for the period 1 August 2022 to 31 July 2024, and that as a result, the Registrar had made the decision to remove her name from the dental care professionals register for non-compliance with the Rules. Mrs Woods was informed that her CPD remained deficient because:

- *She had seven verifiable hours of CPD outstanding;*
- *She had not provided an Activity Log; and*
- *Two certificates (dated 25 January 2023 and 13 February 2023) were not in her registered GDC name.*

Mrs Woods was notified that unless an appeal was submitted, the Registrar's decision would take effect on 5 December 2024.

#### Notice of Appeal

On 28 November 2024, the Council received a Notice of Appeal ('NOA'), from Mrs Woods which confirmed that she wished to appeal against the decision to remove her from the dental care professionals register. Mrs Woods provided a cover letter, accompanied by a supporting letter and a number of CPD certificates.

#### CPD assessment

On 4 December 2024, Mrs Woods' CPD evidence was assessed by a Registrations Operations Officer. Mrs Woods was deemed to be non-compliant with her CPD requirements on the basis that she had five verifiable CPD hours outstanding for the period 1 August 2022 to 31 July 2024.

Mrs Woods was deemed to be non-compliant with her CPD requirements on the basis that:

- Mrs Woods is outstanding five verifiable CPD hours;

- Lloyds Training Associates LTD Certificate dated 13 February 2024 did not contain aims, objectives or GDC outcomes, and was not in your registered name;
- 5 x certificates submitted at Notice of Appeal are duplicates previously assessed and accepted;
- 2 x certificates submitted at Notice of Appeal are duplicates previously assessed and rejected;
- 1 x certificate submitted at Notice of Appeal is dated between the 1 August 2021 – 31 July 2022 cycle year and is outside the cycle dates requested; and
- 34 x certificates submitted at Notice of Appeal are dated between 1 August 2024 – 31 July 2025 cycle year and are outside the cycle dates requested.

It was confirmed that, as of 4 December 2024, Mrs Woods had completed five hours verifiable CPD hours between 1 August 2022 to 31 July 2024.

### **Submissions**

11. In its written submissions, the GDC submitted that Mrs Woods is non-compliant with the CPD requirements because she has failed to provide a CPD record demonstrating that she has completed the minimum requirement for the period 1 August 2022 to 31 July 2024, in accordance with Rule 2.
12. It is submitted by the Registrar that Mrs Woods was reminded on numerous occasions of the need to complete her CPD hours and of the requirement to complete ten verifiable CPD hours in each two-year period, as set out in detail above.
13. The Council acknowledges, and is sympathetic to, Mrs Woods' personal circumstances. However, it is the Registrar's position that all registrants ought to be aware of the requirements for continued registration which includes ongoing compliance with the CPD at all times, appropriately educated and trained to provide safe care to the public. Compliance with CPD is mandatory for all dental professionals and is a requirement for their continued registration.
14. The Council acknowledges the effort Mrs Woods has made to rectify her shortfall. However, the Council cannot consider any additional CPD Ms Woods has, or intends to, complete, where that CPD is completed outside of the CPD year, as set out in Rule 2 of the 2017 Rules.
15. As of 4 December 2024, Mrs Woods has completed five verifiable CPD hours between 1 August 2022 and 31 July 2024, which clearly breaches the requirement that dental care professionals submit evidence that they have completed a minimum of ten verifiable CPD hours in each two-year period.
16. In Mrs Woods NOA, it was submitted that she was sincerely apologetic for not meeting her CPD requirements and wished to provide assurance that this would never happen again. Mrs Woods stated that she had worked as a dental nurse for 20 years and had an unblemished career. She explained that she had confused the CPD requirements, believing that as she had completed 60 hours of CPD thus far in her cycle, this was sufficient.
17. Mrs Woods stated that she loves her job as a dental nurse and has always worked hard to improve her knowledge and skills. As previously detailed, Mrs Woods referred to her personal

circumstances. Whilst she accepts the Council does not consider her personal circumstances as amounting to 'exceptional', she stated that the impact it had on her personally was profound.

18. Finally, Mrs Woods confirmed that having met with her manager and practice owner, they have confirmed they will support her to ensure she complies with the CPD requirements

### **Committee's decision**

19. 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 Mrs Woods in her NOA. It heard and accepted the advice of the Legal Adviser.
20. Having carefully considered the information before it, the Committee noted that a number of the certificates provided by Mrs Woods are not compliant as they did not contain the relevant outcomes and objectives. It also took into account that it was regrettable that Mrs Woods had not been able to obtain certification for the training course she had undertaken. However, based on the verifiable CPD evidence that has been provided, the Committee was able to confirm that Mrs Woods has completed five verifiable hours of CPD for the 1 August 2022 to 31 July 2024 period.
21. The Committee took into account Mrs Woods details regarding her personal circumstances and noted that Mrs Woods continued to work as a dental nurse during the relevant time. Having considered the details provided by Mrs Woods, the Committee accepted the Registrar's assessment that the information did not amount to 'exceptional circumstances' that would have prevented Mrs Woods from completing her CPD requirements for the relevant period.
22. Accordingly, the appeal is dismissed. The Committee wished to remind Mrs Woods 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.
23. This will be confirmed to Mrs Woods in writing.
24. That concludes this determination.