

ON PAPERS

Registration Appeals Committee (CPD Appeal)

24 March 2026

Name: BRANDRETH, Sudina Tanya

Registration number: 299180

Case number: CAS-213482-N0B3D9

General Dental Council: Needa Bhatti, ILAS

Registrant: Unrepresented

Outcome: Appeal dismissed

Committee members: Val Evans (Chair, Lay member)
Katherine Barrett (DCP member)
Gulshana Choudhury (Dentist member)

Legal adviser: Claire Robinson

Committee Secretary: Sarah Crewe

At this hearing the Committee made a determination that includes some private information. That information shall be omitted from any public version of this determination and the document marked to show where private material is removed.

1. This was an appeal hearing before the Registration Appeals Committee (RAC). The hearing was conducted remotely on Microsoft Teams.
2. The appeal was against the decision of the Registrar of the General Dental Council (the Council) to erase Miss Brandreth from the Register for apparent non-compliance with the statutory Continuing Professional Development (CPD) requirements. The hearing was 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').
3. Neither party was present at today's hearing. The Committee first considered the issues of service and whether to proceed with the hearing on the papers in the absence of Miss Brandreth and any representatives for either party. The Committee accepted the advice of the Legal Adviser on both of these matters.

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

4. Notification of this appeal was sent to Miss Brandreth by Recorded Delivery and secure email on 11 February 2026 in accordance with Rule 5 of the Registration Appeal Rules.
5. The Committee noted that conducting the appeal on the papers is the default position of the GDC unless an appellant requests an oral hearing. It took into account that the GDC's acknowledgement of Miss Brandreth's appeal, dated 18 November 2025, informed Miss Brandreth that she could request an oral hearing within 28 days of the date of the letter. Having considered the documents provided, the Committee was satisfied that Miss Brandreth had made no such request.
6. The Committee noted that the bundle of documents and case summary that the Committee would be considering were sent to Miss Brandreth by Recorded Delivery and secure email on 4 March 2026. The Committee did not receive the main bundle until 7 days before the hearing, however it considered that it had sufficient time to read and consider the papers in order to make a fully informed decision on this appeal.
7. In the circumstances, the Committee was satisfied that it was appropriate to consider today's appeal in the absence of either party and on the papers.

Private Hearing

8. At the beginning of the hearing, the Committee considered whether, under Rule 14(1) of the Appeal Rules, this appeal should be held in private since the matters under consideration relate to matters relating to Miss Brandreth's private and family life.

9. The Committee bore in mind that, as a starting point, hearings should be conducted in public session. However, having accepted the advice of the Legal Adviser, the Committee decided that to protect Miss Brandreth's private and family life a private and public determination will be produced if required.

Decision and reasons on the appeal

Background

10. 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.
11. The CPD Rules came into force on the 1 January 2018 and took effect in respect of dental care professionals on 1 August 2018.
12. 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.
13. Miss Brandreth 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 required minimum CPD requirement for the period 1 August 2023 to 31 July 2025.

Summary

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

The Appellant first registered with the General Dental Council ("the Council") as a dental nurse, on 1 February 2022. Therefore, in accordance with Rule 1 as set out above, the Appellants current 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 the Appellant's registered email address. This reminder notified the Appellant 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 2025. The Appellant was advised that if she did not submit a compliant statement before the deadline, her registration may be put at risk.

On 10 June 2025, the Council also sent the Appellant an Annual Renewal Notice 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 annual CPD statement. The Appellant was also reminded in the Annual Renewal Notice that she was required to submit her CPD statement by 28 August 2025. It was stated that the Appellant would need to have completed at least 10 hours of CPD over the last two years, unless she was in the first year of her first CPD cycle.

On 12 June 2025, the Council sent a further email reminder to the Appellants registered email address. The email requested that the Appellant submit her CPD statement by 28 August 2025 and stated that she was required to complete a minimum of 10 hours of CPD during each period of two consecutive years.

On 7 July 2025, the Council sent an email to the Appellant in which she was reminded that her Annual Renewal for 2025 was due on or before 28 August 2025. It was noted that the Council was yet to receive her Annual Retention Fee or her indemnity declaration. The Appellant was reminded within this email of the need to complete her CPD statement and of the requirement to complete 10 verifiable CPD hours during any two consecutive years.

On 18 July 2025, the Council sent another email reminder to the Appellant's registered email address. This reminder notified the Appellant that her CPD year was coming to an end and stated that she was required to submit her CPD statement by 28 August 2025. The requirement to complete 10 hours of CPD during each period of two consecutive years was reiterated. The Appellant was notified that if she failed to submit a compliant CPD statement by this date, her registration may be put at risk.

On 5 August 2025, the Council sent further email reminder to the Appellant's registered email address. These reminders notified the Appellant that her CPD year had come to an end and stated that she was required to submit her CPD statement by 28 August 2025. The requirement to complete 10 hours of CPD during each period of two consecutive years was reiterated. As with the previous notices', the Appellant was notified that if she failed to submit a compliant CPD statement by this date, her registration may be put at risk.

On 12, 21 and 28 August 2025, the Council sent SMS reminders to the Appellants registered mobile number. These reminders, which appear at pages 25-27, notified the Appellant that her 2024-2025 CPD Annual Statement was incomplete and directed her to sign onto eGDC and update her statement by 28 August 2025.

Rule 6 notice

On 25 September 2025, the Council sent a notice under Rule 6 to the Appellant by recorded delivery to her registered address. The notice stated that, although the Appellant 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. It was noted that she had submitted an annual CPD statement of 3 verifiable hours for the 2023-2024 CPD year and an annual CPD statement of 3 verifiable hours for the 2024-2025 CPD year. The notice stated that if the Appellant wished to retain her registration, she should submit her CPD record to the Registrar by 23 October 2025 in order to demonstrate that she had met the requirement. The Appellant was advised to let the Council know if there were any reasons or exceptional circumstances that meant she was unable to submit a compliant statement. The Appellant 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 register.

There is confirmation that delivery was attempted 25 February 2025 however, it was unsuccessful. On 26 September 2025, a copy of the notice was also sent via email to the Appellant's registered email address.

Rule 8 notice

On 5 November 2025, the Council sent a Rule 8 notice to the Appellant's registered address by recorded delivery. This notice confirmed that the Appellant had failed to provide a compliant CPD record demonstrating that she had met the minimum requirement for the period 1 August 2023 to 31 July 2025. Whilst the Appellant had previously declared 3 verifiable hours for 2023-2024, the notice detailed that the Council has not been provided with any evidence of the Appellants CPD record or any evidence of exceptional personal circumstances which may have prevented the Appellant from completing her CPD as required. As a result, the Registrar had made the decision to remove her name from the register for non-compliance with the Rules.

The Appellant was notified that unless an appeal was submitted, the Registrar's decision would take effect on 5 December 2025.

The delivery was attempted on 11 November 2025 however it was unsuccessful as there was no one at the registered address to receive. On 6 November 2025, a copy of the notice was sent via email to the Appellant's registered email.

Notice of Appeal

On 9 November 2025, the Council received a Notice of Appeal ("NOA") via email from the Appellant which confirmed that she wished to appeal against the decision to remove her from the register. The Appellant attached the following evidence:

a. [PRIVATE]

- b. *An unconditional offer for the course 'FDSC Oral Health Science' at the University of Essex*
- c. *Screenshots email confirming the Appellants intermission from her studies in February 2023 and September 2024*
- d. *A letter from her GP surgery titled 'fitness to resume studies' which states the Appellant [PRIVATE].*
- e. *As outlined above, the Appellant provided [PRIVATE]*
- f. *In her NOA, the Appellant set out the following grounds of appeal:*
- g. *[PRIVATE]*
 - *Ongoing commitment to professional development: The Appellant detailed that she recognises the importance of maintaining professional competence and CPD compliance. She stated that she is committed to fulfilling all outstanding requirements as soon as possible. She explained that her inability to meet the CPD target during this period was due to unavoidable personal and medical circumstances.*
 - *The Appellant asked that the Council take these mitigating factors into account and reconsider her removal from the register. She further requested an extension or the opportunity to submit evidence of her ongoing professional education.*
 - *Finally, the Appellant stated she remained fully dedicated to her professional development and to upholding the standards expected by the GDC.*

On 10 November 2025, the Appellant's CPD evidence was assessed by an Operations Officer. The Appellant was deemed to be non-compliant with her CPD requirements on the basis that she had 0 verifiable CPD hours for the period 1 August 2023 to 31 July 2025.

Submissions

15. In its written submissions, the GDC submitted that Miss Brandreth is non-compliant with her CPD requirements 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.
16. The Registrar acknowledged and was sympathetic to the personal challenges the Appellant experienced in balancing her health challenges with her personal and professional life during the relevant period. However, the Registrar submits that it is the Appellant's responsibility to ensure that she meets her CPD requirements, as CPD compliance is a legal requirement of registration.
17. The Registrar notes that since the Rule 8 notice, the Appellant has provided some additional context and evidence. Based on the new evidence, it was submitted that it remains a matter for the Committee as to whether exceptional circumstances exist in

line with the Guidance on the Registrar's Discretion to Erase for CPD Non-Compliance.

Committee's decision

18. 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 Brandreth in her NOA. It heard and accepted the advice of the Legal Adviser.
19. Having carefully considered the information before it, the Committee noted that Miss Brandreth did not complete her required CPD hours for the period 1 August 2023 – 31 July 2025.
20. In its consideration of Miss Brandreth's personal circumstances, the Committee took into account the evidence that she has provided regarding the health and personal circumstances that she had during this period. However, it noted that the evidence shows that these circumstances were apparent during the second year of the two year cycle and there is no documentary evidence to support why Miss Brandreth was unable to complete any hours during the first year of her cycle or during the last several months of the second year of her cycle.
21. Whilst the Committee gave careful and detailed consideration to the circumstances outlined by Miss Brandreth and it was sympathetic to her difficult personal circumstances, it was not satisfied that these circumstances were exceptional such as to prevent Miss Brandreth from undertaking any CPD hours over the two year period.
22. Accordingly, the appeal is dismissed. The Committee wished to remind Miss Brandreth 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. Unless Miss Brandreth exercises her right of appeal to the County Court (if their address is in England or Wales) or the sheriff in whose sherrifdom their address is located (if based in Scotland), in accordance with paragraph 6 of Schedule 4A to the Act, the erasure decision will take effect upon the expiry of the 28-day appeal period. It will then be open to Miss Brandreth to apply for the restoration of her name if she meets the CPD and other requirements for restoration.
24. This will be confirmed to Miss Brandreth in writing.
25. That concludes this determination.



Private