

ON PAPERS

Registrations Appeal Hearing CPD Appeal Hearing

30 March 2026

Name: AWAIS, Komal
Registration number: 308060
Case number: CAS-213726-B4G5F1

General Dental Council: Noranne Griffith, ILAS

Registrant: Unrepresented

Outcome: Appeal dismissed

Committee members: Anthony Mole (Chair and Lay)
Rebecca Northover (Dentist)
Joshua Kelly (Dental Care Professional)

Legal adviser: Trevor Jones

Committee Secretary: Kate Anderson

At this meeting 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 meeting before the Registration Appeals Committee (RAC). The hearing was conducted remotely via Microsoft Teams
2. The appeal was against the decision of the Registrar of the General Dental Council (GDC) to erase Ms Awais 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').
3. 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 Ms Awais and on the papers

4. Notification of this appeal was sent to Ms Awais 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 Ms Awais' appeal, dated 26 November 2025, informed Ms Awais 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 Ms Awais 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 Ms Awais by Recorded Delivery and secure email on 11 February 2026.
7. The Committee was satisfied that it was appropriate to consider today's appeal in the absence of the parties and on the papers.

Private Hearing

8. The Committee noted from the documentation provided by Ms Awais for her appeal that she makes reference to events in her private and family life. Having accepted the advice of the Legal Adviser, the Committee decided that the meeting should be part-held in private to protect Ms Awais' private and family life. A private and public determination will also be produced.

Summary of the Legal Framework

9. Section 36Z1 of The Dentists Act 1984 (as amended) (“the Act”) sets out the requirements for dental care professionals’ training and development as follows:
- “(1) In relation to each profession, or class of members of a profession, specified in regulations under section 36A(2), rules shall require registered dental care professionals to undertake such professional training and development as may be specified in the rules.*
- (2) Where a person is registered in the dental care professionals register under a title applying to a particular profession, or class of members of a profession, and it appears to the registrar that the person has failed to comply with the requirements of rules under subsection (1) relating to that profession or class, the registrar may erase that person’s name from registration in that register under that title.*
- (3) Where, under subsection (2), a person’s name has been erased from registration under a particular title, that name shall be restored to the dental care professionals register under that title on that person’s application if he satisfies the registrar—*
- (a) of Matter D within the meaning of section 36C¹; and*
(b) that he meets the requirements of—
(i) section 36L², and
(ii) any rules made under section 36Z2 which apply to his case³.
- (4) Rules shall specify the procedures to be followed before the registrar—*
(a) may, under subsection (2), erase a person’s name from registration in the dental care professionals register under a title; or
(b) may, under subsection (3), make a decision whether or not to restore a person’s name to that register under a title.”
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. Rule 2(1) of the CPD Rules sets out the minimum number of hours of CPD a practitioner must complete within their CPD cycle.

14. Rule 2(5)(b) of the CPD Rules requires dental care professionals to undertake at least 10 hours of CPD during each period of two consecutive CPD years (including any such two-year period which spans over more than one CPD cycle).
15. Rule 3 provides the requirement that all registrants must maintain a written record of all CPD that the practitioner plans to undertake and has undertaken during the CPD cycle. Rule 3 also sets out what the written record must include.
16. Rule 4 of the CPD Rules states that for each CPD year, a practitioner must submit to the Registrar a statement which confirms the number of hours of CPD undertaken during that corresponding year or, if the practitioner has not undertaken any CPD in that CPD year, confirmation that no CPD has been undertaken. The practitioner must also confirm in this statement that they have kept a CPD record, that the CPD undertaken (where applicable) was relevant to the practitioner's field of practice and declare the information in their statement is full and accurate. This statement must be completed within 28 days of the end of that CPD year. Rule 4 also provides that in the final CPD year of the cycle, the annual CPD statement must also include the total number of hours of CPD undertaken by the practitioner during the CPD cycle.
17. Pursuant to Rule 5, the Registrar may send the practitioner a notice, at any time during the CPD cycle, requiring them to submit their CPD record or any documents or information the Registrar considers relevant for the assessment of the practitioner's compliance with the requirements of these rules.
18. Rules 6 and 7 prescribe various notification requirements under which the Registrar may require a practitioner to, among other things, submit their CPD record and/or provide evidence of their compliance with the CPD requirement.
19. Rule 8 provides that the Registrar "*may erase the practitioner's name*" in circumstances where the practitioner has either failed to comply with a notice sent under Rule 6 or 7, or where the Registrar is not satisfied from the response provided by the practitioner that they have met the CPD requirement and/or other related obligations under the relevant Rules.
20. In accordance with Rule 9 is open to the practitioner who has not complied with the CPD requirement as set out in Rule 2 in respect of a CPD cycle, to apply in writing to the Registrar for a further period in which to complete the outstanding CPD in respect of that cycle (a "period of grace"). They must do so before the end of the CPD cycle but no sooner than six months before the end of the cycle. If the Registrar is satisfied that there is good reason to do so, the Registrar may grant a single period of grace ending 56 days after the end of the CPD cycle.
21. Following erasure from the register for non-compliance with CPD, a dental care professional can apply to be restored to the register if they meet the conditions set out in Rules 10 and 11.

Summary of the factual background

22. Ms Awais first registered with the General Dental Council (“the Council”) as a dental care professional, with the title of dental nurse, on 12 June 2023. Therefore, in accordance with **Rule 1** as set out above, the Ms Awais’ current CPD cycle began on 1 August 2023 and will end on 31 July 2028.
23. On 22 May 2025, the Council sent an email reminder to Ms Awais’ registered email address. This reminder notified the Ms Awais 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. Ms Awais was advised that if she did not submit a compliant statement before the deadline, her registration may be put at risk.
24. On 10 June 2025, the Council sent Ms Awais 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. Ms Awais was also reminded in this notice that she was required to submit her CPD statement by 28 August 2025. It was stated that Ms Awais 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.
25. On 12 June 2025, 7 July 2025, 18 July 2025 and 5 August 2025, the Council sent email reminders to Ms Awais’ registered email address. These reminders notified Ms Awais that her CPD year was coming to an end. The reminders stated that she was required to submit her CPD statement by 28 August 2025.
26. Ms Awais was notified that if she failed to submit a compliant CPD statement by this date, her registration may be put at risk. Between 12 August 2025 and 28 August 2025, the Council sent three SMS reminders regarding the CPD statement to Ms Awais’ registered mobile number.
27. Ms Awais submitted an annual CPD statement for the 2024-2025 CPD year, declaring that she had completed six verifiable CPD hours. A screenshot confirming the details of the declaration made by Ms Awais appears in the bundle.

Rule 6

28. On 25 September 2025, the Council sent a notice under Rule 6 (the “Rule 6 notice”) to Ms Awais by recorded delivery to her registered address. Confirmation that the Rule 6 notice was sent by recorded delivery was provided to the Committee. Tracking information was unable confirm that the Rule 6 notice was delivered.
29. On 26 September 2025, a copy of the Rule 6 notice was also sent via email to the Appellant’s registered email address. A copy of this email was provided to the Committee.

30. The Rule 6 notice stated that, although Ms Awais 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 zero verifiable hours for the 2023-2024 CPD year and an annual CPD statement of six verifiable hours for the 2024-2025 CPD year. The Rule 6 notice stated that if Ms Awais wished to retain her registration, she should submit her CPD record to the Registrar by 23 October 2025 to demonstrate that she had met the requirement. Ms Awais was informed that if the Council did not receive a response to the Rule 6 notice or if her response was unsatisfactory, she may be erased from the dental care professionals register.

Rule 8

31. On 5 November 2025, the Council sent a notice under Rule 8 (the “Rule 8 notice”) to the Appellant’s registered address by recorded delivery. Confirmation that the Rule 8 notice was sent by recorded delivery was provided to the Committee. Tracking information was unable confirm that the Rule 8 notice was delivered.
32. On 6 November, a copy of the Rule 8 notice was sent via email to Ms Awais’ registered email address.
33. The Rule 8 notice confirmed that Ms Awais 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 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. Ms Awais was notified that unless an appeal was submitted by 3 December 2025, the Registrar’s decision would take effect on 5 December 2025.

The Appeal

34. On 24 November 2025, the Council received a Notice of Appeal (NOA) in the form of an email from Ms Awais, which confirmed that she wished to appeal against the decision to remove her from the dental care professionals register because she failed to provide a compliant CPD record demonstrating that she had met the minimum requirement for the period 1 August 2023 – 31 July 2025. She asked the Registrar to consider exceptional circumstances.
35. A number of documents were attached with the email:
- A letter of detailed representations,
 - The Appellant’s PDP,
 - CPD certificates.
36. In the letter of representations, Ms Awais apologised for not having completed the required CPD hours. [IN PRIVATE]
37. On 25 November 2025, the Ms Awais’ CPD evidence was assessed by a Registration Operations Officer. A copy of this assessment appears was provided

to the Committee. Ms Awais was deemed to be non-compliant with her CPD requirements on the basis that she had four outstanding CPD hours, had not submitted an activity log, and 24 of the CPD certificates submitted with the NOA were not from the relevant two year period. Moreover, six of the 24 certificates were deficient in that they did not contain the hours taken to complete, learning content, aims, objectives or GDC outcomes.

Submissions

38. In the GDC's written submissions, the Registrar's position was set out as follows:

'It is the Registrar's position that the Appellant is non-compliant with the CPD requirements for the reasons as set out above.

It is submitted by the Registrar that the Appellant was reminded on numerous occasions of the need to complete her CPD hours and of the requirement to complete 10 verifiable CPD hours in each two-year period, as set out in detail above.

As of 25 November 2025, the Appellant had completed six verifiable CPD hours between 1 August 2023 and 31 July 2025, which clearly breaches the requirement that dental care professionals submit evidence that they have completed a minimum of 10 verifiable CPD hours in each two-year period.

As set out above, there is no power to waive these provisions.

Although the Registrar has sympathy with the Appellant, the reasons put forward by the Appellant in her NOA for her non-compliance are not sufficient to amount to exceptional personal circumstances bearing in mind the GDC Guidance on the Registrar's Discretion to Erase for CPD Non-Compliance. Evidently, the Appellant was not prevented from working during the period under consideration; she was working full time and extra hours. The Registrant was able to complete some CPD. CPD hours completed outside 1 August 2023 and July 2025 are not relevant.

It is open to the Appellant to apply to restore her registration at any time following this appeal.'

Committee's decision and reasons on the appeal

39. 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 Ms Awais in her Notice of Appeal. It heard and accepted the advice of the Legal Adviser. The Committee also took note of the GDC's *Guidance on the Registrar's Discretion to Erase for CPD Non-Compliance* (version 2, as updated May 2025).
40. The Committee first calculated the number of hours of CPD which Ms Awais was required to undertake. Ms Awais was required to complete at least 10 hours of

verifiable CPD during her two-year CPD cycle within the period 1 August 2023 to 31 July 2025.

41. Having carefully reviewed the CPD records which Ms Awais submitted, the Committee determined that she demonstrates having completed 6 verifiable hours of CPD within the period of 1 August 2023 to 31 July 2025. This was consistent with the Registrar's assessment that Ms Awais was 4 hours short in the relevant period. Therefore, the Committee determined that Ms Awais is not compliant with her statutory obligations under the CPD Rules.
42. The Committee was satisfied that the GDC has complied with the 2017 Rules in dealing with Ms Awais' CPD requirements including the serving of the statutory notices on her that the correct procedure leading to the Registrar's erasure decision had been followed. The remaining consideration for the Committee was therefore whether the Registrar's decision to erase should be allowed to stand.
43. The Committee also balanced the interests of Ms Awais 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 recognised that the CPD requirement is a mandatory statutory requirement which applies to all registered dental professionals to ensure patient safety and in maintaining wider public confidence in the profession so as to meet the overarching objective of the GDC under Section 1 of the Act. The Committee noted the personal circumstances Ms Awais outlined in her appeal. However it noted that during this period Ms Awais continued to work, and was working more hours than usual during the period. There had been no prolonged period of time absent from work. The Committee considered the circumstances and while it was sympathetic to Ms Awais' personal circumstances, it did not deem these to be exceptional. The Committee noted that Ms Awais had undertaken further CPD but that this post-dated the period in which the CPD was required. The Committee was not satisfied that there was a sufficient and satisfactory reason for Ms Awais not to comply with her CPD requirements.
44. Therefore, having regard to all the circumstances, the Committee determined that there were insufficient grounds on which this appeal should be allowed. Ms Awais had failed to demonstrate that she was compliant with her obligations under the CPD Rules. The decision of the Registrar to erase her name was reached correctly in accordance with the procedural requirements of the Rules and following repeated reminders to Ms Awais of her obligations under the CPD Rules and the importance of compliance in order to maintain continued registration.
45. The Committee was satisfied that the decision was proportionate. Accordingly, the appeal is dismissed.
46. Unless Ms Awais 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 Ms Awais to apply for the restoration of her registration if she meets the CPD and other requirements for restoration.

47. This will be confirmed to Ms Awais in writing.
48. That concludes this determination.

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