

ON PAPERS

Registrations Appeal Hearing CPD Appeal Hearing

20 April 2026

Name: JALF, Mandeep
Registration number: 226642
Case number: CAS-213828-N4P6S5

General Dental Council: Needa Bhatti, ILAS
Registrant: Unrepresented

Outcome: Appeal dismissed

Committee members: Harpreet Ark (Chair, Dentist member)
Clive Powell (Lay member)
Jodie Mahoney (Dental Care Professional member)

Legal adviser: Jenny Appleton

Committee Secretary: Sara Page

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

1. This is an appeal hearing before the Registration Appeals Committee (RAC). The appeal is against the decision of the Registrar of the General Dental Council (GDC) to erase Mrs Jalf 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 Jalf 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 Jalf had made no such request.
4. Notification of this appeal was sent to Mrs Jalf by Recorded Delivery and secure email on 6 March 2026 in accordance with Rule 5 of the Registration Appeal Rules. Further documentation was sent to Mrs Jalf on 30 March 2026 inviting her to submit any further evidence for consideration by the RAC no later than 13 April 2026. The Committee noted that Mrs Jalf submitted a further reflective statement and remediation plan by email on 13 April 2026 and that Mrs Jalf has not requested an oral hearing.
5. The Committee was satisfied that it was appropriate to consider today's appeal in the absence of either party and on the papers.

Application for the hearing to be held partly in private

6. At the beginning of the hearing, the Committee considered an application made by the GDC in its written submissions under Rule 14(1) of the Appeal Rules that that this hearing be held partly in private where reference is made to Mrs Jalf's private and family life.
7. The Committee heard and accepted the advice of the Legal Adviser in this regard. The Committee bore in mind that, as a starting point, hearings should be conducted in public session. However, having regard to the information before it, the Committee was satisfied that should matters regarding Ms Jalf's private and family life be referred to, her personal interests outweighed the public interest in this case and determined such matters be heard in private session.
8. The Committee will therefore create a public determination redacting any matters of a sensitive nature. Where any verbal reference is to be made on the record, such discussion will be marked as private, should a transcript be requested by a member of the public.

Decision and reasons on the appeal

Background

9. 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.
10. The CPD Rules came into force on the 1 January 2018 and took effect in respect of dental care professionals on 1 August 2018.
11. 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.
12. Mrs Jalf appealed against the Registrar's decision that her CPD is non-compliant because she failed to complete her annual CPD statement for the period 1 August 2024 – 31 July 2025 by the deadline of 23 October 2025.

Summary

13. The GDC's case in support of its decision was summarised as follows:
14. Mrs Jalf first registered with the General Dental Council ('the Council') as a dental nurse on 31 May 2012. Therefore, in accordance with Rule 1 as set out above, Mrs Jalf's current CPD cycle began on 1 August 2022 and will end on 31 July 2027.
15. On 22 May 2025, the Council sent an email reminder to Mrs Jalf's registered email address. This email notified Mrs Jalf 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 Mrs Jalf of the need to complete a minimum of ten hours of CPD during each period of two consecutive years, including any two-year period spanning over more than one CPD cycle. It was also explained within this email, that a declaration would need to be made in the event that no CPD had been undertaken for 2024-2025 by adding '0' hours to the CPD record. Mrs Jalf was warned that if she failed to submit her CPD statement by this date her registration may be put at risk.
16. On 10 June 2025, the Council sent Mrs Jalf 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. Mrs Jalf was also reminded in this notice that she was required to submit her CPD statement by 28 August 2025 and of the need to complete a minimum of ten hours of CPD for every two consecutive CPD years of registration.
17. Between 12 June and 28 August 2025, the Council sent numerous reminders to Mrs Jalf regarding her CPD requirements.

Rule 7 notice

18. On 25 September 2025, the Council sent Mrs Jalf a notice under Rule 7 of the 2017 Rules to her registered address by recorded delivery. The notice stated that Mrs Jalf had failed to submit a CPD statement for the year 1 August 2024 – 31 July 2025 by the deadline provided of 28 August 2025. The notice required Mrs Jalf to submit her CPD statement by the deadline of 23 October 2025 either online or by completing and returning the enclosed statement. It also informed her that a CPD statement included submitting the CPD hours she had completed and also making her declarations and that if any of this information was missing her statement would not be deemed complete. The notice reminded Mrs Jalf that if the Council did not receive her statement by 23 October 2025, she may be erased from the dental care professionals register.
19. Mrs Jalf did not submit her annual statement by 23 October 2025.

Rule 8 notice

20. On 5 November 2025, the Council sent a Rule 8 Notice to Mrs Jalf's registered address by recorded delivery. This notice confirmed that Mrs Jalf had failed to complete an annual CPD statement for the period 1 August 2024 – 31 July 2025 by the deadline of 23 October 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 2017 Rules. Mrs Jalf was notified that unless an appeal was submitted, the Registrar's decision would take effect on 3 December 2025.

Notice of Appeal

21. On 30 November 2025, the Council received an email from Mrs Jalf including a Notice of Appeal (NOA), information relating to her personal circumstances, and CPD evidence. On 3 December 2025, the Council's Senior Operations Officer completed a CPD Assessment Statement. It was determined that Mrs Jalf was non-compliant with her CPD requirements as:

'Mrs Mandeep Jalf failed to submit an Annual CPD statement for cycle year 2024-2025 by the deadline date 28 August 2025. The registrant was then issued a Notice 7 in which to submit her CPD statement and again failed to provide an Annual CPD statement by the deadline 23 October 2025.'

Although Mrs Mandeep Jalf provided CPD certificate as part of the NOA, 1 duplicated and x25 Agilio certificates provided are all out of year cycle requested.

Furthermore, Mrs Mandeep Jalf is outstanding 10 CPD verifiable hours, who has failed to provide sufficient evidence that demonstrates compliance with the CPD requirement of completing 10 hours of verifiable CPD over 2 consecutive years.'

Submissions

22. In Mrs Jalf's NOA, it was submitted that she was appealing against the Council's decision to remove her from the register which resulted from a misunderstanding on her part. Mrs Jalf

was unaware she was required to submit a statement declaring zero CPD hours if she had not undertaken any CPD that year.

23. [PRIVATE].

24. Mrs Jalf explained that she had not undertaken any CPD for the period 1 August 2024 – 31 July 2025 but she understood she was required to complete a minimum of ten hours of verifiable CPD in a two-year period. Mrs Jalf apologised for her mistake in assuming she was not required to make a declaration that she had undertaken zero hours in that CPD year. Mrs Jalf stated that she had reflected on her error and now understood this requirement.
25. Mrs Jalf stated that she was not currently working in the field of dentistry but planned to return to part time clinical work in early 2026 and re-establish her professional career after a difficult two-year period [PRIVATE].
26. Mrs Jalf provided evidence of having undertaken 22 hours of CPD within her current CPD cycle and attached evidence of this. She requested that she be kept on the dental care professionals register ahead of her planned return to clinical practice in the future.
27. In its written submissions, the GDC submitted that Mrs Jalf's CPD is non-compliant because she failed to make an annual CPD statement for the years 2024-2025 by 28 August 2025 as required by Rule 4 of the 2017 Rules.
28. Mrs Jalf also failed to provide her annual CPD statement by the further deadline of 23 October 2025 as set out in her Rule 7 notice.
29. Mrs Jalf was required to confirm the number of hours of CPD undertaken within the CPD year 2024 to 2025, and if they had not undertaken any CPD in that CPD year, confirmation that no CPD had been undertaken. Mrs Jalf would also have needed to have confirmed that they had kept a CPD record, that the CPD they had undertaken (where applicable) was relevant to her field of practice as well as declared the information in their statement was full and accurate.
30. In addition, Mrs Jalf CPD is non-compliant because she has failed to demonstrate that she has completed the minimum requirement to undertake ten hours of verifiable CPD during the period 1 August 2023 to 31 July 2025.
31. The GDC noted that Mrs Jalf has provided some CPD documentation with her NOA for CPD completed after 31 July 2025. 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.
32. The GDC acknowledged the difficult personal circumstances Mrs Jalf experienced. However, the GDC respectfully submitted that Mrs Jalf was sent numerous reminders between 22 May 2025 – 5 August 2025 specifically notifying her that even if she had not undertaken any CPD during the cycle year she was still required to make a declaration for 2024-2025 by adding 'zero' hours on her declaration but had not done so. In addition, the GDC submitted that Mrs Jalf has been registered since 2012 and has been sent regular reminders in relation to her CPD requirements since her registration with the Council. All registrants should be aware of their CPD requirements and their obligations in this respect as the mandatory CPD requirements are an important part of the GDC's regulatory system that protects the public and patients.

Committee's decision and reasons

33. The Committee had regard to the documentary evidence provided today and took account of the written submissions made by the GDC and those made by Mrs Jalf. It heard and accepted the advice of the Legal Adviser who referred to the GDC document, '*Guidance on the Registrar's Discretion to Erase for CPD Non-Compliance (February 2024)*'.
34. The Committee noted that Mrs Jalf has provided some 25 certificates of CPD activity that are outside of the relevant CPD cycle. In this regard, the Committee considered that Mrs Jalf has not provided any evidence of verifiable CPD hours during the relevant cycle and is therefore outstanding ten CPD hours for the period of 1 August 2023 – 31 July 2025.
35. In addition, Mrs Jalf failed to submit her CPD Annual Statement by the deadline of 23 October 2025, despite numerous reminders from the GDC to do so.
36. In considering Mrs Jalf's NOA, the Committee was sympathetic to her personal circumstances, [PRIVATE] and her submission that this impacted upon her ability to comply with her CPD requirements and leading to her taking a break from her career. It also noted the information contained within the reflective statement provided by Mrs Jalf by email on 13 April 2026. The Committee acknowledged that Mrs Jalf had been sent reminders by the GDC throughout May and August 2025 but did not provide any response to those reminders. Mrs Jalf has not provided any evidence, [PRIVATE] she was prevented from completing the documentation confirming that no hours of CPD had been completed for 31 July 2024 to 1 August 2025.
37. In all the circumstances, the Committee concluded that Mrs Jalf has not complied with her CPD requirements and that whilst there is evidence of difficult circumstances during the relevant period, they were not considered to be exceptional as to prevent Mrs Jalf from complying with her CPD requirements over the two-year period from 1 August 2023 to 31 July 2025.
38. Accordingly, the appeal is dismissed. The Committee wished to remind Mrs Jalf 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.
39. Unless Mrs Jalf exercises her right of appeal to the County Court (if her address is in England or Wales) or the sheriff in whose sheriffdom 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 Mrs Jalf to apply for the restoration of her name if she meets the CPD and other requirements for restoration.
40. This will be confirmed to Mrs Jalf in writing.
41. That concludes this determination.