

ON PAPERS

Registrations Appeal Hearing CPD Appeal Hearing

23 March 2026

Name: DOHERTY, Amanda

Registration number: 6062

Case number: CAS- 213492-D0D3G4

General Dental Council: Instructed by 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: Jamie Barge

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 Miss Doherty from the Register for apparent non-compliance with the statutory Continuing Professional Development (CPD) requirements. The meeting 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 meeting 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 matter

Decision to conduct the appeal in the absence of Miss Doherty 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 Miss Doherty had made no such request.
4. Notification of this appeal was sent to Miss Doherty by Recorded Delivery and secure email on 17 February 2026 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 the parties 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. Miss Doherty appealed against the Registrar's decision that despite her CPD being non-compliant because she failed to provide a compliant CPD record demonstrating that she had met the minimum requirement for the period between 1 August 2023 and 31 July 2025 and asked the Registrar to consider exceptional circumstances.

Summary

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

Miss Doherty first registered with the General Dental Council (“the Council”) as a dental hygienist on 8 July 2002. Therefore, in accordance with Rule 1 as set out above, Miss Doherty’s current CPD cycle began on 1 August 2023 and will end on 31 July 2028. The CPD cycle which has been assessed and the evidence for which has been deemed non-compliant, and which is the subject of this appeal, is Miss Doherty’s CPD for the period between 1 August 2023 and 31 July 2025.

On 22 May 2025, the Council sent an email reminder to Miss Doherty’s registered email address. This reminder, notified Miss Doherty that her 2024-2025 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 email also reminded Miss Doherty of the need to complete a minimum of 10 hours of CPD during each period of two consecutive years, including any two-year period spanning over more than one CPD cycle. Miss Doherty was notified that if she failed to submit her CPD statement by this date her registration may be put at risk.

On 10 June 2025, the Council sent Miss Doherty 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. Miss Doherty was also reminded in this notice that she was required to submit her CPD statement by 28 August 2025. This letter also reminded Miss Doherty of the need to complete a minimum of 10 hours of CPD for every two consecutive CPD years of registration.

On 12 June 2025, 7 July 2025, 18 July 2025 and 5 August 2025, the Council sent further email reminders to Miss Doherty’s registered email address, notifying her that her 2024-2025 CPD year was coming to an end and reminding her to submit her CPD statement, detailing how many CPD hours she had completed during that year, by 28 August 2025.

On 5 August 2025 Miss Doherty submitted an annual CPD statement for the 2024-2025 CPD year, declaring that she had completed zero verifiable CPD hours.

Between 12 August 2025 and 28 August 2025, the Council sent three text message reminders to Miss Doherty’s registered mobile number requesting that she submit her 2023-2024 CPD annual statement by 28 August 2025.

Rule 6 notice

On 25 September 2025, the Council sent Miss Doherty a notice under Rule 6 of the 2017 Rules to her registered address by recorded delivery. The notice stated that, although Miss Doherty 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. Miss Doherty was informed that she had previously submitted a CPD statement for 2023-2024 detailing three verifiable CPD hours and then submitted a statement for 2024-2025 with zero verifiable CPD hours. Miss Doherty was informed that she needed to submit a compliant CPD record covering 1 August 2023 to 31 July 2025 by the deadline of 23 October 2025. Miss Doherty was notified that if the Council did not receive a response to the notice or if

following a review of her response it was considered that her CPD requirements had not been met, she may be erased from the dental care professionals register. Miss Doherty was also asked to inform the Council if there were any reasons or exceptional circumstances that had meant she was unable to submit a compliant statement for the relevant period.

Correspondence with Miss Doherty

On 8 October 2025 the Council received a letter from Miss Doherty together with a Personal Development Plan and CPD certificates. The letter from Miss Doherty set out the following:

- a. Miss Doherty had fallen behind with her CPD due to her personal circumstances and “*lack of time*”.
- b. Miss Doherty was fully aware of the GDC’s expectations of her as a dental professional and her CPD.
- c. Over the two years [REDACTED][IN PRIVATE]. This was a challenging period, and Miss Doherty was sorry that she had not kept up to date with her CPD. Miss Doherty was eager to get back on target with her CPD.

Rule 8 notice

On 5 November 2025, the Council sent a Rule 8 notice to Miss Doherty’s registered address by recorded delivery. This notice confirmed that Miss Doherty’s evidence demonstrated completion of three hours of verifiable CPD between 1 August 2023 and 31 July 2025. This was not sufficient to meet her CPD requirements to complete a minimum of 10 hours of verifiable CPD for every two consecutive CPD year period. Her CPD was deficient as:

- Miss Doherty had failed to provide sufficient evidence that demonstrated compliance with the CPD requirement to complete 10 hours of verifiable CPD over two consecutive years.
- Miss Doherty was outstanding 7 verifiable hours.
- Miss Doherty had not provided an activity log.
- 2 x Agilio certificates dated August 2025 were out of period, therefore, not applicable to this assessment.

Further, the letter also set out that Miss Doherty’s personal circumstances, as set out in her letter received on 8 October 2025, had been considered in accordance with the *Guidance on the Registrar’s Discretion to Erase for CPD Non-compliance*. The Registrar concluded these personal circumstances did not amount to exceptional personal circumstances

Notice of Appeal

On 7 November 2025, the Council received an email from Miss Doherty attaching a Notice of Appeal (‘NOA’).

The reasons for Miss Doherty’s appeal, as set out in the NOA, can be summarised as follows:

- a. Miss Doherty had worked as a dental professional for over 30 years. This was the first occasion she had failed to adhere to her CPD requirements, which she understood needed to be met, due to a year of [IN PRIVATE.]
- b. [IN PRIVATE.]
- c. Miss Doherty realised that the personal issues she raised appeared as excuses. However, these issues had impacted her personal and work life in a negative manner.
- d. Miss Doherty took pride in her role as a dental professional. She was the first member of her family to attend university and study as a dental hygienist.
- e. Miss Doherty was shocked and saddened to receive the Council's notice of erasure. Miss Doherty asked that she was not removed from the register. She was reliant on her income as a dental professional.
- f. Miss Doherty offered to undertake the required seven hours of CPD within one week if the Council wished.

On 7 December 2025 the Council received an email from Miss Doherty. [IN PRIVATE.]

On 11 November 2025, Miss Doherty's NOA and CPD evidence was reviewed by the Council's Operations Officer. This assessment sets out why Miss Doherty's CPD evidence was non-compliant:

- *'Miss Doherty failed to provide sufficient CPD evidence that demonstrates compliance with the CPD requirement of completing 10 hours over 2 consecutive years.*
- *2 x Agilio certificates dated August 2025 are not within the assessment period and therefore not applicable.*
- *You did not provide your activity log.'*

As of 11 November 2025, Miss Doherty had demonstrated that she had completed three hours of verifiable CPD hours for the period 1 August 2023 – 31 July 2025. Miss Doherty was therefore required to provide a further seven hours of CPD evidence for this period.

Submissions

11. In its written submissions, the Council's position is Miss Doherty's CPD is non-compliant 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.
12. The Council notes that Miss Doherty has provided CPD documentation with her NOA for CPD completed in August 2025. However, the CPD undertaken outside of the relevant period cannot be counted. 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. As set out above, there is no power to waive these provisions.
13. The Council acknowledges the difficult personal circumstances Miss Doherty experienced due to her ill health, and her other personal circumstances. However, CPD is an ongoing requirement of registration and must continue to be met while she continues to work despite the difficulties faced in her personal life.

14. The Council respectfully submits that Miss Doherty was sent reminders as early as 22 May 2025 drawing her attention to the requirement that dental care professionals must complete a minimum of 10 hours of CPD in each two-year period.
15. The Council is of the view that Miss Doherty has completed three verifiable CPD hours between 1 August 2023 and 31 July 2025 and has a shortfall of seven hours. Therefore, Miss Doherty failed to meet the requirement that dental care professionals complete a minimum of 10 verifiable CPD hours in each two-year period as per Rule 2(5) of the 2017 Rules.
16. It is open to Miss Doherty to apply to restore her registration at any time following this appeal.

Committee's decision

17. 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 Doherty in her Notice of Appeal. It heard and accepted the advice of the Legal Adviser.
18. The Committee first calculated the number of hours of CPD which Miss Doherty was required to undertake. The Committee was in agreement with the Registrar (and it is not in dispute on appeal) that Miss Doherty was required to complete at least 10 hours of verifiable CPD during her two-year CPD period. She is short of 7 verifiable hours. The Committee was of the view that despite her personal circumstances, it considered that she could have completed this CPD prior to the deadline of 31 July 2025. Miss Doherty has completed three verifiable CPD hours between 1 August 2023 and 31 July 2025.
19. The Committee was satisfied that Miss Doherty had not complied with this requirement.
20. The Committee has taken full account of the difficult personal circumstances Miss Doherty experienced. It noted the number of reminders that were sent by both email and text to Miss Doherty. The Committee determined that it was her responsibility to be familiar with the CPD requirements. Having carefully considered Miss Doherty's personal circumstances, the Committee did not consider these to amount to exceptional circumstances that would have prevented her from completing her CPD requirements in the statutory time frame. As of today, Miss Doherty had only completed three hours of verifiable CPD in the requisite period. The Committee is satisfied that Miss Doherty was non-compliant with her CPD requirements.
21. The Committee was satisfied that the GDC has complied with the 2017 Rules in dealing with Miss Doherty's CPD requirements including the serving of the statutory notices on her.
22. The Committee also balanced the interests of Miss Doherty 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 was satisfied that the decision was proportionate, and this appeal therefore fails.
23. Accordingly, the appeal is dismissed. The Committee wished to remind Miss Doherty 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.
24. This will be confirmed to Miss Doherty in writing.
25. That concludes this determination.