

ON PAPERS

Registration Appeals Committee (CPD Appeal)

25 March 2026

Name: O'DONNELL, Eryn Leigh

Registration number: 307224

Case number: CAS-213595-P9J9W6

General Dental Council: Ela Rexhaj, 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

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 O'Donnell 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 O'Donnell 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 O'Donnell and on the papers

4. Notification of this appeal was sent to Miss O'Donnell by Recorded Delivery and secure email on 17 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 O'Donnell's appeal, dated 18 November 2025, informed Miss O'Donnell 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 O'Donnell 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 O'Donnell by Recorded Delivery and secure email on 5 March 2026. The Committee did not receive the main bundle until the week 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 part in private since the matters under consideration include matters relating to Miss O'Donnell'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 O'Donnell'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 O'Donnell 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 23 April 2023. Therefore, in accordance with Rule 1 as set out above, the Appellant's current CPD cycle began on 1 August 2023 and will end on 31 July 2028.

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 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, requesting that she submit her CPD statement by 28 August 2025 and stating 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, which appears at pages 24-25, 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 a further email reminder to the Appellant's registered email address. This reminder 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 reminders, 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 Appellant's registered mobile number. These reminders notified the Appellant that her 2024-2025 CPD Annual Statement is 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 the Appellant had not declared enough hours to meet the requirement of completing 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 1 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 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.

On 26 September 2025, a copy of the notice was also sent via email to the Appellant's registered email address.

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. The notice detailed that the Appellant had not provided the Council with any evidence of her CPD record. Further, that the Council had not been provided with 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.

On 6 November 2025, a copy of the notice was sent via email to the Appellant's registered email address.

Notice of Appeal

On 13 November 2025, the Council received a Notice of Appeal ("NOA") by email from the Appellant which confirmed that she wished to appeal against the decision to remove her from the register.

In her NOA, the Appellant set out the following grounds of appeal:

- [PRIVATE].

- [PRIVATE].

• [PRIVATE].

• *Finally, the Appellant detailed that she did make efforts to catch up on her CPD however she missed the cut-off date due to the exceptional circumstances. She requested that her appeal be considered in light of these personal and medical challenges. She assured the Council that she remains committed to maintaining the standards required of a dental nurse.*

• *The Appellant attached the following evidence:*

a. [PRIVATE].

b. [PRIVATE].

c. *Picture of Statutory Sick Pay form.*

On 17 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 10 verifiable CPD hours outstanding for the period 1 August 2023 to 31 July 2025. It was noted that the Council did not receive any CPD evidence for the period 2023-2025 and also did not receive a Personal Development Plan or Activity log. It was confirmed that, as of 17 November 2025, the Appellant had completed 0 hours of verifiable CPD hours over two consecutive years for the years 2023-2025. Lastly, it was noted that the Appellant did not submit any evidence of exceptional personal circumstances at the Rule 6 notice stage.

On 3 December 2025, the Council received an email from the Appellant which contained CPD certificates.

On 4 December 2025, the additional evidence was assessed by an Operations Officer. The Appellant was deemed to be non-compliant with her CPD requirements on the basis that:

- *She was outstanding 7 verifiable CPD hours.*
- *The Council did not receive a Personal Development Plan or Activity Log.*
- *4 x Dental Nurse Network certificates with a completion date August 2025 are out of cycle, therefore, not applicable to this assessment.*
- *1 x Colgate certificate with a completion date August 2025 is out of cycle, therefore, not applicable to this assessment.*
- *2 x Cavity certificates with a completion date August 2025 are out of cycle, therefore, not applicable to this assessment.*
- *The Council did not receive any information or evidence of exceptional personal circumstances to consider at the Notice 6 stage.*

It was confirmed that, as of 4 December 2025, the Appellant had completed 3 hours of verifiable CPD, which was not enough to meet the Enhanced CPD requirements to submit 10 hours of CPD over two consecutive years for the years 2023-2025.

Submissions

15. It is the Registrar's position that Miss O'Donnell 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 01 August 2023 to 31 July 2025, in accordance with Rule 2.
16. 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.
17. The Registrar acknowledges and is sympathetic to the challenges the Appellant experienced in her personal life, namely the challenges with her [PRIVATE] health. The Registrar submits that prior to the Rule 8 notice, the Appellant did not make any contact or provide the Registrar with any supporting evidence regarding exceptional circumstances which the Registrar could have considered. Further, it is the Appellant's responsibility to ensure that she meets her CPD requirements, as CPD compliance is a legal requirement of registration, and is not linked to employment. Where the Appellant has continued to work, despite her difficulties, she is required to maintain compliance with her CPD requirements.
18. It is noted that the Appellant completed CPD after the stipulated deadline, to demonstrate her commitment to her professional development. The Registrar submits that, any CPD completed outside of the relevant period (1 August 2023 – 31 July 2025) cannot be considered for the purpose of exercising the discretion to erase.
19. The Registrar notes that since the Rule 8 notice, the Appellant has provided context and evidence in relation to her difficulties in not meeting the CPD requirements. Based on the new evidence, it remains a matter for the Committee as to whether exceptional circumstances exist in line with the Guidance.
20. As of 3 December 2025, the Appellant had completed 3 verifiable CPD hours between 1 August 2023 and 31 July 2025, which clearly breaches the requirement that dental care professional must submit evidence that they have completed a minimum of 10 verifiable CPD hours in each two-year period.

Committee's decision

21. The Committee had regard to the documentary evidence provided and took account of the written submissions made on behalf of the GDC and those made by Miss O'Donnell in her NOA. It heard and accepted the advice of the Legal Adviser.
22. Having carefully considered the information before it, the Committee concluded that Miss O'Donnell did not complete her required CPD hours for the period 1 August 2023 – 31 July 2025.

23. In its consideration of Miss O'Donnell'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 there was a lack of documentary evidence to substantiate why these matters prevented her from doing her CPD hours despite apparently continuing to work during this period.
24. Whilst the Committee gave careful and detailed consideration to the circumstances outlined by Miss O'Donnell and it was sympathetic to her difficult personal circumstances, it was not satisfied that these circumstances were exceptional such as to prevent Miss O'Donnell from undertaking any CPD hours over the two year period. The Committee did consider whether to remit to the Registrar with a direction to seek more evidence, however it was aware that despite multiple opportunities Miss O'Donnell did not provide this information. Therefore, it was not satisfied that remitting would be the appropriate outcome.
25. Accordingly, the appeal is dismissed. The Committee wished to remind Miss O'Donnell 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.
26. Unless Miss O'Donnell exercises her right of appeal to the County Court (if their 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 Miss O'Donnell to apply for the restoration of her name if she meets the CPD and other requirements for restoration.
27. This will be confirmed to Miss O'Donnell in writing.
28. That concludes this determination.