

PUBLIC MEETING ON PAPERS

Registration Appeals Committee

Continuing professional development (CPD) appeal meeting

21 April 2026

Name: CUMMINGS, Olivia Christine

Registration number: 297767

Case number: CAS-214059

General Dental Council: Megan Wolliner, ILAS (not present)

Registrant: Not present and not represented

Outcome: Appeal dismissed

Committee members: Debbie Jones (Dental Care Professional) (Chair)
Emma Grant (Dentist)
Caroline Healy (Lay)

Legal adviser: Kenneth Hamer

Committee Secretary: Gareth Llewellyn

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 Cummings's name from the register for apparent non-compliance with her statutory Continuing Professional Development (CPD) requirements. The meeting is being held in accordance with 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. Neither party was present at today's meeting following notification from the GDC that the appeal was to be conducted on the papers. The meeting was conducted remotely via Microsoft Teams in line with current practice.

Preliminary matters

Decision to conduct the appeal in the absence of Miss Cummings 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 Cummings had made no such request.
4. The Committee noted that notification of this appeal was sent to Miss Cummings by Recorded Delivery and secure email on 23 March 2026 in accordance with Rule 5 of the Registration Appeal Rules.
5. The Committee accepted the advice of the Legal Adviser. The Committee was satisfied that it was appropriate to consider today's appeal in the absence of either party and on the papers in accordance with Rule 4 (3).

Application to consider the case in private

6. In its written submissions the GDC applied for the hearing to be conducted in private in accordance with Rule 14 of the Registration Appeal Rules for the purposes of protecting Miss Cummings's private and family life.
7. The Committee bore in mind that, as a starting point, hearings should be conducted in public session. However, due to the nature of the matters in this case, and having regard to the information before it, the Committee was satisfied that the personal interests of Miss Cummings outweighed the public interest in this case.
8. The Committee was, accordingly, satisfied that the hearing should be held in private when reference was made to Miss Cummings's private and family life. It therefore acceded to the application. However, in reality, no mention was made to such matters. Accordingly, the meeting proceeded entirely in 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 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 (DCPs) on 1 August 2018.
11. In accordance with Rule 1, a 'CPD cycle' means, in respect of DCPs, a period of five years beginning on 1 August following the date the DCPs is first registered and each subsequent period of five years. A 'CPD year' means, in respect of a DCP, a period of 12 months beginning on 1 August in any calendar year.

Summary

12. Miss Cummings first registered with the GDC as a DCP on 13 October 2021. Her CPD cycle, which is the context of this appeal, began on 1 August 2022 and is due to end on 31 July 2027. Beginning in May 2025 the GDC sent correspondence on a number of occasions to remind Miss Cummings that her CPD year was nearing its end and that she needed to provide a CPD statement detailing how many hours of CPD she had completed that CPD year by no later than 28 August 2025. Miss Cummings was also reminded of the requirement that she complete a minimum of 10 hours' worth of verifiable CPD during each period of two consecutive years, namely the period of 1 August 2023 to 31 July 2025. The GDC then sent further reminders to Miss Cummings over the next few weeks.
13. The GDC wrote to Miss Cummings on 25 September 2025 to state that, although she had submitted a CPD statement, she had not declared enough CPD hours to meet the minimum requirement of 10 hours' worth of CPD for the two-year CPD period of 1 August 2023 to 31 July 2025. It was noted that Miss Cummings had previously submitted an annual CPD statement of zero verifiable hours for the 2023-2024 CPD year, and an annual CPD statement of two verifiable hours for the 2024-2025 CPD year, which represents a shortfall of some eight hours.
14. Miss Cummings emailed the GDC on 20 October 2025 to state that she acknowledged that she had undertaken insufficient CPD and stated that she had misunderstood the requirements. Miss Cummings also referred to difficult personal circumstances, including matters relating to her health and that of a third party, which impacted on her ability to undertake additional CPD.
15. On 5 November 2025 the GDC wrote to Miss Cummings to inform her that the Registrar had decided to remove her name from the register on account of her failure to meet the minimum requirements for CPD, namely 10 hours in the two-year period of 1 August 2023 to 31 July 2025.
16. Miss Cummings appealed against the Registrar's decision that her CPD is non-compliant. Her appeal has led to today's meeting.

Summary of submissions

17. In its written submissions, the GDC submitted that, as set out above, Miss Cummings has not complied with the CPD requirements of her registration, as she has not demonstrated that she has undertaken a minimum of 10 hours' worth of verifiable CPD in the two-year CPD period of 1 August 2023 to 31 July 2025.

18. In support of her appeal Miss Cummings submitted in particular that the Registrar has failed to take sufficient account of her personal circumstances.

Committee's decision

19. The Committee had regard to the documentary evidence provided today. It took account of the written submissions made by the GDC and those made by Miss Cummings. The Committee accepted the advice of the Legal Adviser concerning its powers and the principles to which it should have regard. The Committee also had regard to the GDC's *Guidance on the Registrar's Discretion to Erase for CPD Non-Compliance* (May 2025).
20. The Committee's powers when considering such appeals are set out at paragraph 4 (8) of Schedule 4A of the Act. The Committee may, in short, decide to dismiss the appeal, allow the appeal and thereby quash the decision appealed against, substitute for the decision appealed against any other decision that the Registrar could have made, or remit the case to the Registrar for disposal in accordance with any directions that it may wish to give.
21. The Committee has determined to dismiss Miss Cummings's appeal against the decision of the Registrar to remove her name from the Register. Although the Committee notes with sympathy the personal matters to which Miss Cummings refers in her appeal, it considers that these matters are not so exceptional or extenuating that it would be appropriate to allow her appeal. The Committee notes that Miss Cummings has continued to work in the interim. Having taken account of all the material presented to it, the Committee is not persuaded that there are appropriate grounds for it to allow Miss Cummings's appeal.
22. Accordingly, the appeal is dismissed.
23. Unless Miss Cummings exercises her right of appeal to the County Court, 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 Cummings to apply for the restoration of her name if she meets the CPD and other requirements for restoration.
24. That concludes this determination.