

HEARING PART-HELD IN PRIVATE

Professional Conduct Committee Initial Hearing

23, 24, 26 and 27 February and 2 to 5 March 2026

Name: BOLTWOOD, Gemma Louise Brenda

Registration number: 268390

Case number: CAS-203806

General Dental Council: Sam Thomas, counsel
Instructed by Rashidah Conroy, IHLPS

Registrant: Not present
Not represented

Fitness to practise: Impaired by reason of misconduct

Outcome: Erased with Immediate Suspension

Duration: N/A

Immediate order: Immediate suspension order

Committee members: Marnie Haywood (Dental Care Professional) (Chair)
Hemash Shah (Dentist)
Lynne Vernon (Lay)

Legal adviser: Tanveer Rakhim

Committee Secretary: Gareth Llewellyn

Determination on preliminary matters – 23 February 2026

Name: BOLTWOOD, Gemma Louise Brenda

Registration number: 268390

1. This is a hearing before the Professional Conduct Committee (PCC). The hearing is being held remotely using Microsoft Teams in line with the Dental Professionals Hearings Service's current practice.
2. Miss Boltwood is not present and is not represented in her absence. Sam Thomas of counsel, instructed by Rashidah Conroy of the General Dental Council's (GDC's) In-House Legal Presentation Service (IHLPS), appears for the GDC.

The charge

3. The charge that Miss Boltwood faces at this hearing, as amended, reads as follows:

'That being a registered dental care professional:

1. *While employed as the Practice Manager at The Practice, you:*
 - (a) *Shared your Dentally log-in details with other team members;*
 - (b) *Amended patient payment accounts to disguise that they had paid the Practice in cash;*
 - (c) *Made payments to R2, a Dental Nurse employed at the Practice, in cash rather than through the Practice payroll system;*
 - (d) *Offered R2 overtime when there was sufficient overtime cover; and/or*
 - (e) *Rounded-up payment amounts.*
2. *You conduct in relation to 1(a), above, was:*
 - (a) *Misleading; and/or*
 - (b) *Dishonest in that you knowingly disregarded patient confidentiality and allowed the accuracy of the information contained on the Dentally system to be undermined in contravention of acceptable company practises and/or policies.*
3. *Your conduct in relation to 1(b), above, was:*
 - (a) *Misleading; and/or*
 - (b) *Dishonest in that you intentionally sought to disguise that patient payments were made in cash in order to facilitate the use of that cash knowing this was contrary to acceptable company practises and/or policies.*
4. *Your conduct in relation to 1(c), above, was:*
 - (a) *Misleading; and/or*
 - (b) *Dishonest in that you knew that payment in cash was contrary to acceptable company practises and/or policies.*
5. *Your conduct in relation to 1(d), above, was:*
 - (a) *Misleading; and/or*
 - (b) *Dishonest in that you knew that the resulting payment for the overtime offered to R2 was an unnecessary expense for the Practice.*
6. *Your conduct in relation to 1(e), above, was:*
 - (a) *Misleading; and/or*
 - (b) *Dishonest in that you arranged for payments to be made to R2, who you knew was not entitled to receive the full rounded amounts paid.*
7. *From 24 March 2023 to 18 May 2023, you failed to cooperate with an investigation*

conducted by the General Dental Council (“GDC”) in that you did not provide the GDC with any or sufficient evidence of indemnity.

AND THAT, in consequence of the matters set out above, your fitness to practise is impaired by reason of your misconduct.’

Format of hearing

4. At a preliminary meeting held on 15 October 2025 a differently-constituted panel of the PCC acceded to an application from the GDC to join Miss Boltwood’s case to that of another registrant, namely [REDACTED BY HEARINGS], in accordance with Rule 25 (1) of the General Dental Council (Fitness to Practise) Rules 2006 (“the Rules”). Accordingly, the hearing of Miss Boltwood’s case has taken place on a joint basis alongside the case relating to [REDACTED BY HEARINGS]. Nonetheless, separate consideration has been given to each case. This determination deals with the case as it relates to Miss Boltwood. [REDACTED BY HEARINGS] is referred to as ‘R2’ in some of the sub-heads of charge that Miss Boltwood faces as set out above.

Service of notice of hearing

5. On behalf of the GDC Mr Thomas submitted that service of notice of this hearing has been properly effected in accordance with Rules 13 and 65 of the Rules. On 19 January 2026 a notice of hearing was sent to the address that Miss Boltwood has registered with the GDC, setting out the date and time of this hearing, as well as the fact that the hearing would be conducted remotely. The notice was sent using the Royal Mail’s Special Delivery service. The notice was subsequently returned to the hearings service’s offices with the information that it had been refused on 20 January 2026. Copies of the notice were also sent to Miss Boltwood by first class post and email.
6. The Committee accepted the advice of the Legal Adviser. The Committee determined that service of the notice of this hearing has been properly effected in accordance with the Rules.

Proceeding in absence

7. The Committee then went on to consider whether to exercise its discretion to proceed in the absence of Miss Boltwood in accordance with Rule 54 of the Rules. Mr Thomas invited the Committee to do so.
8. The Committee accepted the advice provided by the Legal Adviser. The Committee was mindful that its discretion to conduct a hearing in the absence of a registrant should be exercised with the utmost care and caution. After careful consideration the Committee determined to proceed with the hearing in Miss Boltwood’s absence. The Committee noted that Miss Boltwood has not engaged with these proceedings, which have culminated in this hearing, for quite some time. The Committee considers that Miss Boltwood has voluntarily absented herself from this hearing, and that an adjournment, which has not been requested, would be unlikely to secure her attendance. The Committee was also mindful of the public interest in the expeditious consideration of this case.

Amendment to charge

9. Mr Thomas then applied to amend the charge pursuant to Rule 18 of the Rules. Mr Thomas sought to amend certain heads of charge by removing references to the name of the practice relevant to these proceedings. The Committee, having accepted the advice of the Legal Adviser, determined to accede to the application on the basis that it was fair and appropriate for the amendments to be made, and that no injustice would be caused to Miss Boltwood. The schedule of charge was duly amended.

Hearing to be part-held in private

10. Mr Thomas invited the Committee to hold part of the hearing in private in accordance with Rule 53 of the Rules where reference is made to an aspect of [R2]'s private life. The Committee, having accepted the advice of the Legal Adviser, determined to accede to the application for the purposes of protecting [R2]'s private life. The hearing therefore proceeded partly in private.

Adjournment of hearing on 24 February 2026

11. During the course of Witness A's oral evidence on 24 February 2026, the Committee determined to adjourn the hearing in light of Witness A's lack of availability to continue and conclude her evidence. The hearing was adjourned until the morning of 26 February 2026, at which time Witness A continued with the giving of her oral evidence.

Further amendment to charge

12. At the conclusion of the GDC's factual case Mr Thomas applied to further amend the charge pursuant to Rule 18 of the Rules. Mr Thomas sought to amend sub-head of charge 6 (b) by further particularising the allegation so that it relates to alleged payments made to [R2] only. The Committee, having accepted the advice of the Legal Adviser, determined to accede to the application on the basis that it was fair and appropriate for the amendments to be made, and that no injustice would be caused to Miss Boltwood, as the effect of the amendment is to narrow the case that she faces. The schedule of charge was duly amended once more.

Findings of fact – 3 March 2026

Background to the case and summary of allegations

13. The allegations giving rise to this hearing relate to Miss Boltwood's employment as a practice manager at which she and the second registrant, namely [R2], worked. The incidents are understood to have taken place in 2022. As stated above, [REDACTED BY HEARINGS] is referred to as 'R2' in the sub-heads of charge set out above. The matters are said to concern the manipulation of the practice's payment systems. The GDC brings a number of allegations in respect of Miss Boltwood's handling of financial transactions. These allegations may be summarised in the following terms.
14. The GDC specifically alleges that Miss Boltwood shared her computer login details with other team members. The GDC alleges that such conduct was misleading, and was also dishonest, in that Miss Boltwood knowingly disregarded patient confidentiality and allowed the computer system's accuracy to be undermined in contravention of the relevant policies at the practice.
15. It is also alleged that Miss Boltwood amended patient payment accounts to conceal that the patients in question had paid the practice in cash. The GDC alleges that such conduct was misleading, and was also dishonest, in that Miss Boltwood intentionally sought to conceal the cash nature of the patients in order to facilitate the use of that cash, knowing that this was in contravention of the relevant policies at the practice.
16. Miss Boltwood faces a head of charge which alleges that she made payments to [R2] in the form of cash rather than through the practice's payroll system. It is again alleged that such conduct was misleading, and was also dishonest, in that Miss Boltwood knew that such payments should not be made in cash according to the relevant policies at the practice.
17. It is further alleged that Miss Boltwood offered [R2] overtime when there was already sufficient overtime cover available. The GDC again contends that such conduct was

misleading, and was also dishonest, in that Miss Boltwood knew that the resulting payment for overtime was an unnecessary expense.

18. The GDC also alleges that Miss Boltwood rounded-up payment amounts, and that such conduct was misleading, and was also dishonest, in that Miss Boltwood knew that the recipient of those rounded-up payments, namely [R2], was not entitled to receive the full rounded-up amounts.
19. The GDC finally alleges that Miss Boltwood failed to co-operate with a GDC investigation, in that she did not provide the GDC with any, or any sufficient, evidence of her indemnity insurance arrangements for nearly two months in 2023.

Evidence

20. The Committee has been provided with documentary material in relation to the heads of charge that Miss Boltwood faces, including the witness statements and documentary exhibits of a casework manager in the GDC’s Fitness to Practise department with knowledge of the case, namely Natalie Shaw; and those of an operational audit manager and financial crime network officer at the company which owns the practice relevant to this case, and who is referred to for the purpose of these proceedings as Witness A.
21. Evidence relating to [R2] was also served on Miss Boltwood. This evidence consists of a separate witness statement and documentary exhibits provided by Witness A.
22. The Committee heard oral evidence from Witness A.

Committee’s findings of fact

23. The Committee has taken into account all the evidence presented to it, both written and oral. It has considered the submissions made by Mr Thomas on behalf of the GDC. The Committee has had regard to the GDC’s *Fitness to Practise: Guidance for the practice committees* (January 2026).
24. The Committee has accepted the advice of the Legal Adviser concerning its powers and the principles to which it should have regard. The Committee is mindful that the burden of proof lies with the GDC, and has considered the heads of charge against the civil standard of proof, that is to say, the balance of probabilities. The Committee has considered each head and sub-head of charge separately.
25. I will now announce the Committee’s findings in relation to each head and sub-head of charge:

1.	<i>While employed as the Practice Manager at The Practice, you:</i>
1. (a)	<i>Shared your Dentally log-in details with other team members;</i> Proved
	The Committee finds the facts alleged at sub-head of charge 1 (a) proved. The Committee has taken particular account of the notes of an investigation meeting that Miss Boltwood attended with Witness A on 18 October 2022. In those notes it is recorded that Miss Boltwood accepted that she had shared her login details for the computer software system in use at the practice, namely Dentally, with other members of staff.

	<p>The Committee considers that this evidence is sufficient for it to find the facts at this sub-head of charge proved.</p>
1. (b)	<p><i>Amended patient payment accounts to disguise that they had paid the Practice in cash;</i></p> <p>Proved</p>
	<p>The Committee finds the facts alleged at sub-head of charge 1 (b) proved.</p> <p>The Committee took account of the oral, written and documentary evidence of Witness A. Witness A provides evidence of her detection of Miss Boltwood having deleted a number of records of payments made to the practice by patients in the form of cash from the practice's Dentally computer software system. The Committee has heard that cash payments were a form of payment that patients could use instead of, for instance, debit or credit card payments. Witness A also gave evidence that the patients in respect of whom records of cash payments had been deleted were then recorded by Miss Boltwood as having been provided with a 'goodwill discount' in the same amount as the cash payment that they had made.</p> <p>The Committee considers that this evidence is sufficient to demonstrate that Miss Boltwood amended patient payment accounts to conceal that patients had made cash payments to the practice. The Committee accepts the evidence of Witness A that Miss Boltwood's 'goodwill discount' had the effect of reconciling, or balancing, a given patient's account with the practice so that there was no debt showing against a patient's name. The Committee considers that Miss Boltwood's amendments to patient payment accounts disguised the cash payments that the patients in question had made.</p> <p>In reaching this conclusion the Committee also had regard to the notes of the investigation meeting that Miss Boltwood attended with Witness A on 18 October 2022, in which Miss Boltwood accepted that she had applied goodwill discounts in respect of a number of patients who had paid in cash.</p> <p>The Committee therefore finds the facts alleged at sub-head of charge 1 (b) proved.</p>
1. (c)	<p><i>Made payments to R2, a Dental Nurse employed at the Practice, in cash rather than through the Practice payroll system;</i></p> <p>Proved</p>
	<p>The Committee finds the facts alleged at sub-head of charge 1 (c) proved.</p> <p>The Committee again had regard to the documentary evidence of Witness A. The notes of the investigation meeting that Miss Boltwood attended with Witness A on 18 October 2022 record that Miss Boltwood stated that she paid [R2] in cash for the overtime that [R2] had worked. Miss Boltwood also stated that these amounts were paid using the cash that patients had paid the practice for treatment. The Committee also had regard to exchanges of text messages sent using the WhatsApp messaging platform between Miss Boltwood and [R2], beginning in April 2022. In one such message sent on 11 May 2022 Miss</p>

	<p>Boltwood stated to [R2], '<i>Do you want the over time (sic) in cash again yes?</i>'. The Committee also noted from Witness A's evidence in relation to [R2] that in the notes of the investigation meeting that [R2] attended with Witness A on 18 October 2022 [R2] stated that Miss Boltwood paid her in cash for the overtime that she worked. The Committee also had regard to the email that Miss Boltwood sent to Witness A on 24 October 2022, which was after the investigation meeting that she had attended with Witness A on 18 October 2022. In that email Miss Boltwood further stated that she had paid [R2] in cash.</p> <p>For these reasons, the Committee finds the facts alleged at sub-head of charge 1 (c) proved.</p>
1. (d)	<p><i>Offered R2 overtime when there was sufficient overtime cover; and/or</i></p> <p>Proved</p>
	<p>The Committee finds the facts alleged at sub-head of charge 1 (d) proved.</p> <p>The Committee again had regard to exchanges of text messages sent using the WhatsApp messaging platform between Miss Boltwood and [R2] beginning in April 2022. In one such message sent on 11 May 2022 Miss Boltwood stated to [R2], in response to a question from [R2] as to whether Miss Boltwood needed a dental nurse on 13 May 2022, '<i>No we're covered for Friday but if you want overtime your (sic) more than welcome to come in</i>'.</p> <p>The Committee also had regard to the notes of an interview that Witness A attended with the relevant area manager. Whilst the Committee has not received direct and sworn evidence from the area manager, it notes that in the interview that he attended with Witness A on 19 October 2022 he referred to staffing levels at the relevant time as being '<i>top heavy</i>' on the day in question, which the Committee takes to mean that there was sufficient staff.</p> <p>Accordingly the Committee finds the facts alleged at sub-head of charge 1 (d) proved.</p>
1. (e)	<p><i>Rounded-up payment amounts.</i></p> <p>Proved</p>
	<p>The Committee finds the facts alleged at sub-head of charge 1 (e) proved.</p> <p>The Committee approached this head of charge on the understanding that it relates to payments made to [R2] in respect of overtime work that she undertook at the practice. The Committee had regard to a WhatsApp message that Miss Boltwood sent to [R2] on 17 August 2022 in which she stated that the cumulative amount of overtime payments owing to [R2] came to £623.63, '<i>but I've rounded it to £625.00</i>'. The Committee finds that this documentary evidence is sufficient to demonstrate that Miss Boltwood rounded up a payment made to [R2] on at least one occasion.</p> <p>The Committee therefore finds the facts alleged at sub-head of charge 1 (e) proved.</p>
2.	<p><i>You conduct in relation to 1(a), above, was:</i></p>

2. (a)	<p><i>Misleading; and/or</i></p> <p>Proved</p>
	<p>In approaching this sub-head of charge, as well as sub-heads of charge 3 (a), 4 (a), 5 (a) and 6 (a), the Committee considered whether Miss Boltwood's conduct created a false impression, or led someone to believe, or led them to be entitled to believe, something that is not in fact true.</p> <p>The Committee finds the facts alleged at sub-head of charge 2 (a) proved. The Committee considers that Miss Boltwood's sharing of her Dentally computer software system login details created the false impression that she was making entries under her name in the practice's computer software system when, in fact, those entries were made by other members of staff.</p> <p>The Committee therefore finds the facts alleged at sub-head of charge 2 (a) proved.</p>
2. (b)	<p><i>Dishonest in that you knowingly disregarded patient confidentiality and allowed the accuracy of the information contained on the Dentally system to be undermined in contravention of acceptable company practises and/or policies.</i></p> <p>Not proved</p>
	<p>In approaching this sub-head of charge, as well as sub-heads of charge 3 (b), 4 (b), 5 (b) and 6 (b), the Committee applied the test set out in <i>Ivey v Genting Casinos (UK) Ltd. t/a Crockfords</i> [2017] UKSC 67. The test is that the Committee must decide subjectively the actual state of an individual's knowledge or belief as to the facts, and must then apply the objective standards of ordinary and decent people to determine whether the individual's conduct was dishonest by those standards.</p> <p>The Committee finds the facts alleged at sub-head of charge 2 (b) not proved. The Committee considers that the GDC has not adduced sufficient evidence to demonstrate that Miss Boltwood's proven conduct in sharing her Dentally computer software system login details amounted to her disregarding patient confidentiality, whether knowingly or otherwise. The Committee carefully considered the evidence presented to it as to Miss Boltwood's state of mind, but it does not find that this evidence, or indeed any other evidence, demonstrates a potential breach of patient confidentiality.</p> <p>The Committee considers that Miss Boltwood's conduct was not, in the circumstances, dishonest, both by reference to her actual knowledge and belief and by reference to the standards of ordinary and decent people.</p> <p>As the Committee finds that the GDC has not discharged its burden of proof at this sub-head of charge, it finds the facts alleged at sub-head of charge 2 (b) not proved.</p>
3.	<p><i>Your conduct in relation to 1(b), above, was:</i></p>
3. (a)	<p><i>Misleading; and/or</i></p>

	<p>Proved</p>
	<p>The Committee finds the facts alleged at sub-head of charge 3 (a) proved.</p> <p>The Committee finds that Miss Boltwood’s proven conduct in amending patient payment accounts to disguise that those patients had paid the practice in the form of cash was misleading. Miss Boltwood recorded in the practice’s patient records that refunds had been given when that was not the case. Further, records of cash payments being made were deleted by her. The Committee considers that this amounts to conduct that was misleading because of the false impression that was created.</p> <p>Accordingly, the Committee finds the facts alleged at sub-head of charge 3 (a) proved.</p>
3. (b)	<p><i>Dishonest in that you intentionally sought to disguise that patient payments were made in cash in order to facilitate the use of that cash knowing this was contrary to acceptable company practises and/or policies.</i></p> <p>Proved</p>
	<p>The Committee finds the facts alleged at sub-head of charge 3 (b) proved.</p> <p>The Committee first considered Miss Boltwood’s actual state of knowledge and belief in respect of her proven conduct in amending patient payment accounts to disguise that those patients had paid in cash. The Committee again had regard to the notes of the investigation meeting that Miss Boltwood attended with Witness A on 18 October 2022. The Committee considers that these notes demonstrate that Miss Boltwood intentionally sought to conceal payments that patients made in cash in order to use that cash to pay [R2] in cash. Miss Boltwood accepted that patient payments would, in the words of Witness A, ‘<i>look wrong</i>’, and that she had amended patient payment records. Miss Boltwood explained that she paid [R2] in cash because of [R2]’s personal circumstances. The Committee is further satisfied that Miss Boltwood’s state of mind was that she knew that her conduct in this regard was contrary to acceptable practices and policies at the practice. Miss Boltwood set out her detailed understanding of the correct procedure to follow when making goodwill payments, as well as her understanding of other relevant financial transaction policies. In the Committee’s judgement this reveals that Miss Boltwood was cognisant of the appropriate manner in which patient payments should be handled and recorded. In light of this evidence, the Committee finds that Miss Boltwood’s state of mind was that she intentionally concealed cash payments in order to use those payments to remunerate [R2] in cash form, and that she did so whilst being aware that this was contrary to relevant practices and policies.</p> <p>The Committee also finds that Miss Boltwood’s conduct was dishonest by reference to the standards of ordinary and decent people. The Committee considered that Miss Boltwood’s actions would be seen as an attempt to deceive her employers and deprive them of a proper understanding of patient payments.</p> <p>For these reasons, the Committee finds the facts alleged at sub-head of charge 3 (b) proved.</p>
4.	<p><i>Your conduct in relation to 1(c), above, was:</i></p>

4. (a)	<p><i>Misleading; and/or</i></p> <p>Proved</p>
	<p>The Committee finds the facts alleged at sub-head of charge 4 (a) proved.</p> <p>The Committee finds that Miss Boltwood's proven conduct in paying [R2] in cash, rather than through the conventional and proper method of remunerating staff via the practice's payroll system, was misleading. Miss Boltwood's employers would have been entitled to believe that [R2] had not worked on certain occasions, given the absence of any records of her having done so on the practice payroll system, when the reality was that [R2] had in fact worked on those occasions. Miss Boltwood's employers would not have had a proper and accurate understanding of work undertaken by staff that they required for the purposes of making, for instance, appropriate and correct calculations and declarations for tax, national insurance (NI) and pension contribution purposes.</p> <p>Accordingly, the Committee finds the facts alleged at sub-head of charge 4 (a) proved.</p>
4. (b)	<p><i>Dishonest in that you knew that payment in cash was contrary to acceptable company practises and/or policies.</i></p> <p>Proved</p>
	<p>The Committee finds the facts alleged at sub-head of charge 4 (b) proved.</p> <p>The Committee had regard to the evidence with which it has been presented of Miss Boltwood's state of mind as to the fact of her paying [R2] in the form of cash rather than through the practice's payroll system. The Committee again paid careful regard to the notes of the investigation meeting that Miss Boltwood attended with Witness A on 18 October 2022. In that meeting Miss Boltwood stated that she accepted that her conduct in this regard was '<i>deceitful, but it came from the right place</i>'. The Committee considers that this admission reveals Miss Boltwood's dishonest state of mind at the relevant times, and demonstrates that she knew that she should not have acted in this way.</p> <p>The Committee also finds that Miss Boltwood's conduct was dishonest by reference to the standards of ordinary and decent people. The Committee considered that Miss Boltwood's actions would be viewed as her being furtive in her remuneration of [R2].</p> <p>For these reasons, the Committee finds the facts alleged at sub-head of charge 4 (b) proved.</p>
5.	<p><i>Your conduct in relation to 1(d), above, was:</i></p>
5. (a)	<p><i>Misleading; and/or</i></p> <p>Proved</p>
	<p>The Committee finds the facts alleged at sub-head of charge 5 (a) proved.</p>

	<p>The Committee finds that Miss Boltwood’s proven conduct in offering [R2] overtime work on 13 May 2022, despite staffing levels being replete for that day, was misleading. The Committee considers that Miss Boltwood created a false impression, namely that there was a greater need for staffing than was in fact the case.</p> <p>The Committee considers that Miss Boltwood’s explicit recognition to [R2] that staffing levels were sufficient for the day in question does not mean that her offer cannot be seen as being objectively misleading.</p> <p>For these reasons, the Committee finds the facts alleged at sub-head of charge 5 (a) proved.</p>
5. (b)	<p><i>Dishonest in that you knew that the resulting payment for the overtime offered to R2 was an unnecessary expense for the Practice.</i></p> <p>Proved</p>
	<p>The Committee finds the facts alleged at sub-head of charge 5 (b) proved.</p> <p>The Committee first had regard to Miss Boltwood’s actual knowledge and belief as to the fact of her offering [R2] overtime work on 13 May 2022 when the staffing levels were sufficient for that day. The Committee again took account of the WhatsApp messages that Miss Boltwood exchanged with [R2], and in particular the message that Miss Boltwood sent on 11 May 2022. In that message Miss Boltwood stated to [R2], in response to a question from [R2] as to whether Miss Boltwood needed a dental nurse on 13 May 2022, ‘No we’re covered for Friday but if you want overtime your (sic) more than welcome to come in’. The Committee finds that this reveals that Miss Boltwood was fully aware that staffing levels were replete for the day in question, and that a payment that would arise from [R2] working in addition to already-sufficient staffing levels would be, by definition, unnecessary.</p> <p>The Committee also finds that Miss Boltwood’s conduct was dishonest by reference to the standards of ordinary and decent people. The Committee considered that Miss Boltwood’s actions would be viewed as her being profligate with the practice’s finances by offering work to [R2] that was not needed.</p> <p>For these reasons, the Committee finds the facts alleged at sub-head of charge 5 (b) proved.</p>
6.	<p><i>Your conduct in relation to 1(e), above, was:</i></p>
6. (a)	<p><i>Misleading; and/or</i></p> <p>Proved</p>
	<p>The Committee finds the facts alleged at sub-head of charge 6 (a) proved.</p> <p>The Committee finds that Miss Boltwood’s proven conduct in rounding up the cumulative sum owing to [R2] for overtime work that she had undertaken was misleading. Although the difference between the amount owing and the amount paid after being rounded-up was small, namely the amount of £1.37, the</p>

	<p>Committee finds that Miss Boltwood’s conduct created the false impression that [R2] had, for instance, worked more, or was being paid at a higher rate, than was in fact the case.</p> <p>Accordingly, the Committee finds the facts alleged at sub-head of charge 6 (a) proved.</p>
6. (b)	<p><i>Dishonest in that you arranged for payments to be made to R2, who you knew was not entitled to receive the full rounded amounts paid.</i></p> <p>Proved</p>
	<p>The Committee finds the facts alleged at sub-head of charge 6 (b) proved.</p> <p>The Committee first had regard to Miss Boltwood’s actual knowledge and belief as to the fact of her rounding up the sum of money owing to [R2] for the overtime work that she had undertaken. The Committee again took account of the WhatsApp messages that Miss Boltwood exchanged with [R2], and in particular the message that Miss Boltwood sent on 17 August 2022 in which she stated that the cumulative amount of overtime payments owing to [R2] came to £623.63, ‘<i>but I’ve rounded it to £625.00</i>’. The Committee finds that this reveals Miss Boltwood’s dishonest mindset, as she expressly recognises that she was intending to pay [R2] more than [R2] was owed.</p> <p>The Committee also finds that Miss Boltwood’s conduct was dishonest by reference to the standards of ordinary and decent people. The Committee considered that Miss Boltwood’s actions would be viewed as her using practice funds inappropriately by paying [R2] more than she was owed.</p> <p>For these reasons, the Committee finds the facts alleged at sub-head of charge 6 (b) proved.</p>
7.	<p><i>From 24 March 2023 to 18 May 2023, you failed to cooperate with an investigation conducted by the General Dental Council (“GDC”) in that you did not provide the GDC with any or sufficient evidence of indemnity.</i></p> <p>Proved</p>
	<p>The Committee finds the facts alleged at head of charge 7 proved.</p> <p>The Committee accepted the unchallenged evidence of Natalie Shaw, and noted that this evidence demonstrates that Miss Boltwood did not provide the details of her indemnity insurance arrangements in the period specified at this head of charge. The Committee further finds that Miss Boltwood was under a duty to co-operate with the GDC in this way, and notes her responsibility for doing so as set out at Standard 9.4.1 of the GDC’s <i>Standards for the Dental Team</i> (September 2013), which states, ‘<i>If you receive a letter from the GDC in connection with concerns about your fitness to practise, you must respond fully within the time specified in the letter. You should also seek advice from your indemnity provider or professional association</i>’.</p> <p>Accordingly, the Committee finds the facts alleged at head of charge 7 proved.</p>

26. We move to stage two.

Determination on misconduct, impairment and sanction – 5 March 2026

27. Following the handing down of the Committee's findings of fact on 3 March 2026, the hearing proceeded to stage two; that is to say, misconduct, impairment and sanction.

Proceedings at stage two

28. The Committee has considered all the evidence presented to it, both oral and written. It has taken into account the submissions made by Mr Thomas on behalf of the GDC. In its deliberations the Committee has had regard to the GDC's *Fitness to Practise: Guidance for the practice committees* (January 2026). The Committee has accepted the advice of the Legal Adviser concerning its powers and the principles to which it should have regard.

Evidence at stage two

29. The Committee received no further evidence at this stage of the hearing.

Summary of submissions

30. Mr Thomas on behalf of the GDC invited the Committee to determine that the facts that the Committee has found proved amount to misconduct, and that Miss Boltwood's fitness to practise is currently impaired with regard to public protection and public interest considerations. Mr Thomas invited the Committee to direct that Miss Boltwood's name be erased from the register.

Fitness to practise history

31. Mr Thomas addressed the Committee in accordance with Rule 20 (1) (a) of the General Dental Council (Fitness to Practise) Rules 2006 ('the Rules'). Mr Thomas stated that Miss Boltwood has no fitness to practise history with the GDC.

Misconduct

32. The Committee first considered whether the facts that it has found proved constitute misconduct. In considering this and all other matters, the Committee has exercised its own independent judgement.

33. In its deliberations the Committee has had regard to the following paragraphs of the GDC's *Standards for the Dental Team* (September 2013) in place at the time of the incidents giving rise to the facts that the Committee has found proved. These paragraphs state that as a dental care professional you must:

1 *Put patients' interests first.*

1.3 *Be honest and act with integrity.*

1.3.1 *You must justify the trust that patients, the public and your colleagues place in you by always acting honestly and fairly in your dealings with them. This applies to any business or education activities in which you are involved as well as to your professional dealings.*

1.3.2 *You must make sure you do not bring the profession into disrepute.*

- 9.1 *Ensure that your conduct, both at work and in your personal life, justifies patients' trust in you and the public's trust in the dental profession.*
- 9.4 *You must co-operate with any relevant formal or informal inquiry and give full and truthful information.*
- 9.4.1 *If you receive a letter from the GDC in connection with concerns about your fitness to practise, you must respond fully within the time specified in the letter. You should also seek advice from your indemnity provider or professional association.*
34. The Committee's findings of fact relate to Miss Boltwood's handling of financial transactions whilst working as a practice manager.
35. The Committee has found that Miss Boltwood shared her computer login details with other team members, and that such conduct was misleading.
36. The Committee also found that Miss Boltwood amended patient payment accounts to conceal that the patients in question had paid the practice in cash. The Committee found that such conduct was misleading, and was also dishonest, in that Miss Boltwood intentionally sought to conceal the cash nature of the payments in order to facilitate the use of that cash, knowing that this was in contravention of the relevant policies at the practice. The Committee further found that Miss Boltwood made payments to a second registrant, namely [R2], in the form of cash rather than through the practice's payroll system. The Committee again determined that such conduct was misleading, and was also dishonest, in that Miss Boltwood knew that such payments should not be made in cash according to the relevant practices and policies at the practice.
37. The Committee also found that Miss Boltwood offered [R2] overtime when there was already sufficient staffing cover available. This conduct was misleading, and was also dishonest, in that Miss Boltwood knew that the resulting payment for overtime was an unnecessary expense. The Committee also found that Miss Boltwood rounded-up an amount of money that she paid to [R2], and that such conduct was misleading, and was also dishonest, in that Miss Boltwood knew [R2] was not entitled to receive the full rounded-up amount.
38. The Committee also found that Miss Boltwood failed to co-operate with a GDC investigation, in that she did not provide the GDC with any evidence of her indemnity insurance arrangements for nearly two months in 2023.
39. In light of the findings of fact that it has made, the Committee has determined that the proven facts amount to misconduct. The Committee finds that Miss Boltwood's dishonest conduct is serious, relating as it does to a fundamental tenet of the profession, namely the need to act with honesty and integrity. Miss Boltwood's repeated dishonest actions in a professional capacity represent a serious departure from proper professional standards of conduct and behaviour. The Committee finds that Miss Boltwood's dishonest conduct would be viewed as deplorable by her fellow practitioners.
40. The Committee also finds that Miss Boltwood's misleading conduct in sharing computer login details, and not co-operating with the GDC, also constitute a serious falling short of the standards reasonably to be expected of a registered dental professional. Therefore, the Committee concludes that these other factual findings also amount to misconduct.
41. For these reasons, the Committee has determined that the facts that it has found proved amount to misconduct.

Impairment

42. The Committee next considered whether Miss Boltwood's fitness to practise is currently impaired by reason of the misconduct that it has found. In doing so, the Committee again exercised its own independent judgement. Throughout its deliberations, the Committee has borne in mind that its overarching objective is to protect the public, which includes the protection of patients and the wider public, the maintenance of public confidence in the profession and in the regulatory process, and the declaring and upholding of proper standards of conduct and behaviour.
43. The Committee has been provided with little, if any, evidence to suggest that Miss Boltwood has any significant insight into her misconduct, or that she has taken steps to address and remedy her wrongdoing. The Committee took account of Miss Boltwood's email to Witness A of 24 October 2022, and the notes of the investigation meeting of 18 October 2022 between Miss Boltwood and Witness A, in which Miss Boltwood expresses some remorse for and understanding of her conduct, but the Committee considers that this does not amount to any significant reflection or insight. The Committee therefore considers that it cannot be said that Miss Boltwood is highly unlikely to repeat her misconduct.
44. Miss Boltwood's dishonesty is highly damaging to her fitness to practise. Miss Boltwood has in the past brought the profession into disrepute, has breached a fundamental tenet of the profession, and has acted dishonestly. She is liable to do so again on account of the shortcomings in her insight and remediation. The consequences for the safety of the public are that Miss Boltwood may again undermine the trust and confidence that patients and the wider public are entitled to place in the profession. Further, Miss Boltwood's repeated dishonesty may place patients at unwarranted risk of harm, for instance financial harm. More broadly, Miss Boltwood's repeated and sustained dishonesty meant that she did not put patients' interests first, and also meant that she departed from relevant practices and procedures which are intended to support that patient-focussed approach. Therefore, in the Committee's judgement, a repeat of Miss Boltwood's failure to put the interests of patients before all other interests may put patients at unwarranted risk of harm. Miss Boltwood's fitness to practise is therefore impaired with regard to public protection considerations.
45. The Committee considers that a finding of impairment is also, and undoubtedly, required to maintain public confidence in the profession and to declare and uphold proper professional standards of conduct and behaviour. In the Committee's judgement the public's trust and confidence in the profession, and in the regulatory process, would be significantly undermined if a finding of impairment was not made given the serious nature of Miss Boltwood's conduct.
46. Accordingly, the Committee finds that Miss Boltwood's fitness to practise is currently impaired by reason of her misconduct with regard to both public protection and public interest considerations.

Sanction

47. The Committee then determined what sanction, if any, is appropriate in light of the findings of facts, misconduct and impairment that it has made. The Committee recognises that the purpose of a sanction is not to be punitive, although it may have such an effect, but is instead imposed to protect patients and safeguard the wider public interests mentioned above. In reaching its decision the Committee has again taken into account the GDC's *Fitness to Practise: Guidance for the practice committees* (January 2026). The Committee has applied the principle of proportionality, balancing the public interest with Miss Boltwood's own interests. The Committee has once more exercised its own independent judgement.

48. The Committee has paid careful regard to the mitigating and aggravating factors present in this case.
49. In respect of the mitigating factors that are present, the Committee notes that Miss Boltwood is of previous good character with no fitness to practise history, and that her misconduct was not motivated by, or resulted in, any financial gain for her. Miss Boltwood has also expressed some remorse for her conduct.
50. In terms of aggravating factors, the Committee considers that Miss Boltwood's conduct was premeditated, that it amounted to an abuse of her trusted position as an employee and in particular as a practice manager, that her dishonesty was sustained and repeated over a period of some months, that Miss Boltwood lacks insight into her actions, and that there is an element of her wilfully and blatantly disregarding the regulatory process, given her failure to co-operate with the GDC.
51. The Committee has considered the range of sanctions available to it, starting with the least restrictive. In the light of its findings, the Committee considers that taking no action or issuing a reprimand would not be sufficient in the particular circumstances of this case. In the Committee's judgement the safety of the public, and public trust and confidence in the profession and in the regulatory process, would be significantly undermined if no action were taken or if a reprimand were issued. In the Committee's judgement a more restrictive sanction is required to declare and uphold proper professional standards of conduct and behaviour.
52. The Committee next considered whether it would be appropriate to conclude the case with a direction of conditional registration. The Committee considers that conditions cannot be formulated to adequately manage the risks to the public that arise from Miss Boltwood's dishonest conduct. The Committee was also mindful that Miss Boltwood is not present at this hearing, which means that it is even more difficult for the Committee to identify workable conditions with which she would comply. The Committee further considers that a direction of conditional registration would not be sufficient to declare and uphold proper professional standards of conduct and behaviour or maintain public trust and confidence in the profession.
53. The Committee next considered whether to direct a period of suspended registration. After careful consideration, the Committee has determined that a direction of suspended registration is not sufficient to meet the serious issues that it has identified in this particular case. The Committee again notes Miss Boltwood's lack of insight into her dishonest conduct, that her actions represent a serious departure from proper standards of conduct and behaviour, that her dishonest conduct was serious, repeated, persistent and multifaceted, and that there remains a continuing risk of serious harm to the public and the wider public interest. The Committee considers that Miss Boltwood's dishonest conduct connotes a deep-seated and harmful personality or professional attitudinal problem, and that her serious misconduct is fundamentally incompatible with continued registration. Any sanction less than that of erasure would not be sufficient to meet the public protection and broader public interest considerations engaged in this case.
54. Accordingly, the Committee directs that Miss Boltwood's name be erased from the register.

Existing interim order

55. In accordance with Rule 21 (3) of the Rules the interim order of suspension in place on Miss Boltwood's registration is hereby revoked.

Immediate order

56. The Committee now invites submissions as to whether Miss Boltwood's registration should be made subject to an immediate order of suspension, pending its substantive direction of erasure taking effect.

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57. The Committee has again had regard to the GDC's *Fitness to Practise: Guidance for the practice committees* (January 2026). The Committee accepted the advice of the Legal Adviser concerning its powers and the principles to which it should have regard.
58. Mr Thomas on behalf of the GDC submitted that an immediate order of suspension is necessary to protect the public and is otherwise in the public interest.
59. In all the circumstances, the Committee has determined to impose an immediate order of suspension. The Committee considers that an immediate order of suspension is necessary to protect the public and is otherwise in the public interest. The Committee finds that, given the risks to the public and the public interest that it has identified, it would not be appropriate to permit Miss Boltwood to practise before the substantive direction of erasure takes effect. The Committee considers that an immediate order for suspension is proportionate, and is consistent with the findings that it has set out in its foregoing determination.
60. The effect of the foregoing determination and this immediate order is that Miss Boltwood's registration will be suspended from the date on which notice of this decision is deemed to have been served upon her. Unless Miss Boltwood exercises her right of appeal, the substantive direction of erasure will be recorded in the register 28 days from the date of deemed service. Should Miss Boltwood decide to exercise her right of appeal, this immediate order of suspension will remain in place until the resolution of any appeal.
61. That concludes this case.