

## ON PAPERS

### Registration Appeals Committee (CPD Appeal)

25 March 2026

**Name:** BAILIE, Cathryn  
**Registration number:** 216540  
**Case number:** CAS-213657-L3Q9G4

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**General Dental Council:** Sushuma Chandrasekhar, ILAS

**Registrant:** Unrepresented

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**Outcome:** Appeal dismissed

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**Committee members:** Val Evans (Chair, Lay member)  
Katherine Barrett (DCP member)  
Gulshana Choudhury (Dentist member)

**Legal adviser:** Claire Robinson

**Committee Secretary:** Sarah Crewe

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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 Mrs Bailie 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 Mrs Bailie 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 Mrs Bailie and on the papers**

4. Notification of this appeal was sent to Mrs Bailie by Recorded Delivery and secure email on 19 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 Mrs Bailie's appeal, dated 5 December 2025, informed Mrs Bailie 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 Mrs Bailie 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 Mrs Bailie by Recorded Delivery and secure email on 4 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 Mrs Bailie'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 Mrs Bailie'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. Mrs Bailie 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:

*Mrs Bailie first registered with the Council as a dental care professional, with the title dental nurse, on 13 October 2011. Mrs Bailie's current CPD cycle began on 1 August 2022 and will end on 31 July 2027.*

*On 22 May 2025, the Council sent an email reminder to Mrs Bailie's registered email address. This reminder notified Mrs Bailie that her 2024-2025 CPD year was coming to an end and that she was required to submit her CPD statement by 28 August 2025. This reminder explained the requirement of detailing the verifiable CPD hours for the current CPD year of 1 August 2024 to 31 July 2025 and also explained the requirement to complete at least 10 verifiable CPD hours over the last two CPD*

*years. Mrs Bailie 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 sent Mrs Bailie 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 the annual retention fee, of the need to make the indemnity declaration, and of the need to make the CPD statement. Mrs Bailie was also reminded in this notice that she was required to submit her CPD statement by 28 August 2025. It was stated that Mrs Bailie would need to ensure that she declared at least 10 hours of verifiable CPD for every two consecutive CPD years. The notice also advises registrants that if they are short of completed CPD hours, they should take the opportunity to be compliant by the deadline.*

*On 12 June 2025 the Council sent an email reminder to Mrs Bailie's registered email address. The reminder, which appears at pages 17-18, notified Mrs Bailie that her 2024-2025 CPD year was coming to an end. She was again prompted of the requirement to submit her CPD statement by 28 August 2025, with a reminder that there is a requirement to complete at least 10 verifiable CPD hours over the last two CPD years. Mrs Bailie was advised that if she did not submit a compliant statement before the deadline, her registration may be put at risk.*

*On 7 July 2025 the Council sent an email to Mrs Bailie in which she was reminded that her Annual Renewal was due on or before 31 July 2025. The Council noted that its records showed that Mrs Bailie had not paid her annual retention fee, made her indemnity declaration or completed her CPD statement. In this email it was stated that the annual CPD statement should include the number of verifiable CPD hours completed between 1 August 2024 and 31 July 2025, noting that there was a requirement to complete a minimum of 10 verifiable CPD hours during any two consecutive CPD years. Mrs Bailie was reminded in this email of the need to submit her CPD statement by 28 August 2025 or her registration may be put at risk.*

*On 18 July 2025 and 5 August 2025, the Council sent further email reminders to Mrs Bailie to her registered email address. These reminders notified Mrs Bailie that her CPD year was coming to an end and that she was required to submit her CPD statement by 28 August 2025. Mrs Bailie was advised that if she did not submit a compliant statement before the deadline, her registration may be put at risk.*

*Between 12 August 2025 and 28 August 2025, the Council sent Mrs Bailie three SMS reminders regarding the submission of her CPD statement to her registered mobile number.*

*Rule 6 Notice*

On 25 September 2025 the Council sent a notice under Rule 6 to Mrs Bailie by recorded delivery to her registered address. This Notice stated that, although Mrs Bailie 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 verifiable CPD over two consecutive CPD years. It was noted that she had submitted an annual CPD statement of eight verifiable hours for the 2023-2024 CPD year and an annual CPD statement of zero verifiable hours for the 2024-2025 CPD year. The notice stated that if Mrs Bailie wanted to retain her registration, she should submit her CPD record to the Council by 23 October 2025 to demonstrate that she had met the requirement. She was informed that if the Council did not receive a response to the notice by that date or if her response was unsatisfactory, she may be erased from the dental care professionals register.

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

On 15 October 2025 the Council received a letter from Mrs Bailie enclosing CPD records and a personal development plan. In the letter Mrs Bailie stated that [PRIVATE] leave from 5 August 2024 to 5 August 2025. She further stated that she had misunderstood the requirement for 10 hours of verifiable CPD to be completed over two years and had planned to complete her CPD on her return [PRIVATE].

#### Rule 8 Notice

On 5 November 2025 the Council sent a Rule 8 erasure notice to Mrs Bailie's registered address by recorded delivery. This Notice confirmed that Mrs Bailie had failed to provide sufficient evidence to demonstrate compliance with the CPD requirement of completing 10 hours of verifiable CPD over 2 consecutive years. She is still outstanding two such hours.

The Council also considered the evidence provided in the letter dated 15 October 2025 and identified the following factors:

- i. the events described by Mrs Bailie were not exceptional circumstances beyond her control;
- ii. the position in relation to [PRIVATE] which is not a factor unless related to exceptional circumstances and further notes that the CPD scheme does not require professionals to undertake CPD in every year of their cycle but requires 10 hours of CPD during each period of two consecutive years. A registrant taking a period of leave from practice, [PRIVATE] can remain compliant by completing their required 10 hours of CPD either side of their leave;
- iii. notwithstanding her personal circumstances, Mrs Bailie was able to continue working as a dental professional;

- iv. *the extent of non-compliance, notwithstanding her personal circumstances; and*
- v. *that she remained registered and CPD is a legal requirement of registration.*

*As a result, the Registrar had made the decision to remove her name from the dental care professionals register for non-compliance with the Rules. Mrs Bailie was notified that unless an appeal was submitted by 3 December 2025, 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 Mrs Bailie's email address.*

#### *Notice of Appeal*

*On 19 November 2025 the Council received a Notice of Appeal ("NOA") from Mrs Bailie which confirmed that she wished to appeal against the decision to remove her from the dental care professionals register. The NOA was accompanied by out of cycle supporting evidence.*

*In the NOA Mrs Bailie offers her apologies for the shortfall of 2 CPD hours, states that she recognizes the importance of CPD, and expresses her regrets that she did not meet the requirements on this occasion. She states that the omission was unintentional and arose from an oversight.*

#### **[PRIVATE]**

*Mrs Bailie states that, [PRIVATE], she faced significant workplace disruption as the practice in which she had spent her entire career had closed and merged with a larger practice. She said that she found this transition overwhelming and while she prioritised adapting to the new environment, she mistakenly believed that she remained compliant and had time to meet her CPD requirements.*

*Mrs Bailie states that the shortfall of 2 hours is minimal and reiterates that this arose from a misunderstanding of the guidelines rather than disregard for professional standards.*

- i. *In the NOA Mrs Bailie requests reconsideration of her case on the grounds that:*
- ii. *the outstanding CPD has now been completed demonstrating her commitment to CPD;*
- iii. *removal from the register would be "a severe outcome for a minor and now fully rectified shortfall, particularly where no issues of patient safety, performance or conduct are involved"; and*

- iv. *remaining on the register would not compromise public protection or the integrity of the register.*

*In the NOA Mrs Bailie states that she sincerely regrets any inconvenience caused and has implemented measures to ensure full compliance in future. She notes that in over 14 years of registration, she has consistently met her CPD obligations and this occasion was the result of a genuine misunderstanding during a period of significant personal and professional transition. She states that she is fully committed to maintaining the highest standards of professional conduct and the confidence of both the public and the profession.*

#### *CPD Assessment*

*On 20 November 2025 Mrs Bailie's CPD evidence was assessed by an Operations Officer. Mrs Bailie was deemed to be non-compliant with her CPD requirements on the basis that she had not completed at least 10 verifiable CPD hours for the period 1 August 2023 to 31 July 2025. She is outstanding two verifiable CPD hours for that period. It was confirmed that, as of 20 November 2025, Mrs Bailie had completed eight verifiable CPD hours between 1 August 2023 to 31 July 2025. It was noted that the Council was unable to accept the 3 FMC CPD certificates provided to the Council as they are dated November 2025 and therefore outside the 1 August 2023 to 31 July 2025 cycle.*

#### **Submissions**

15. It is the Registrar's position that Mrs Bailie 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 Mrs Bailie was reminded on numerous occasions of the need to complete her CPD hours and of the requirement to complete at least 10 verifiable CPD hours during the period 1 August 2023 to 31 July 2025.
17. As of 20 November 2025, Mrs Bailie had completed eight verifiable CPD hours between 1 August 2023 and 31 July 2025, which breaches the requirement that dental care professionals must submit evidence that they have completed a minimum of 10 verifiable CPD hours over that period.
18. It is the Registrar's position that all registrants ought to be aware of the requirements for continued registration which includes ongoing compliance with the CPD requirements. The purpose of the CPD requirement is to ensure that GDC registrants are, at all times, appropriately educated and trained to provide safe care to the

public. Compliance with CPD is mandatory for all dental professionals and is a requirement for their continued registration.

19. The Council cannot consider CPD completed outside of the CPD year as set out in Rule 2. As set out above, there is no power to waive these provisions.
20. In her NOA, Mrs Bailie explains her personal situation. The Registrar refers to the Council's Guidance on the Registrar's Discretion to Erase for CPD Non-Compliance, May 2025.
21. The Registrar acknowledges Mrs Bailie's regret and her explanations and expresses sympathy for her personal circumstances. Given the additional information in the NOA that was not available to the Registrar at the time of the Rule 8 notice, the Committee is invited to consider whether this alters the position, such that the Committee may consider exceptional circumstances exist in this case.

#### **Committee's decision**

22. 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 Mrs Bailie in her NOA. It heard and accepted the advice of the Legal Adviser.
23. Having carefully considered the information before it, the Committee concluded that Mrs Bailie did not complete her required CPD hours for the period 1 August 2023 – 31 July 2025.
24. In its consideration of Mrs Bailie's personal circumstances, the Committee took into account the evidence that she has provided regarding the health and personal circumstances that led to her 'oversight' in complying with the CPD requirements. However, the Committee concluded that oversight is not an exceptional circumstance and it is the responsibility of a registrant to ensure that they meet all of the criteria for registration.
25. Accordingly, the appeal is dismissed. The Committee wished to remind Mrs Bailie 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 Mrs Bailie exercises her right of appeal to the County Court (if their address is in England or Wales) or the sheriff in whose sherrifdom 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 Bailie to apply for the restoration of her name if she meets the CPD and other requirements for restoration.
27. This will be confirmed to Mrs Bailie in writing.

28. That concludes this determination.