

ON PAPERS

Registrations Appeal Hearing CPD Appeal Hearing

22 April 2026

Name: Alanis, Banan
Registration number: 301133
Case number: CAS-213847-Y0L0X6

General Dental Council: Instructed by Noranne Griffith, ILAS

Registrant: Unrepresented

Outcome: Appeal dismissed

Committee members: Harpreet Ark (Chair, Dentist member)
Clive Powell (Lay member)
Jodie Mahoney (DCP member)

Legal adviser: Jenny Appleton

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 Mrs Alanis from the Register for apparent non-compliance with the statutory Continuing Professional Development (CPD) requirements. The hearing 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 hearing 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 Mrs Alanis 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 Mrs Alanis had made no such request.
4. Notification of this appeal was sent to Mrs Alanis by Recorded Delivery and secure email on 16 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.

Private Hearing

6. 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 Alanis' private and family life.
7. 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 Alanis' private and family life a private and public determination will be produced if required.

Decision and reasons on the appeal

Background

8. 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.
9. The CPD Rules came into force on the 1 January 2018 and took effect in respect of dental care professionals on 1 August 2018.

10. 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.
11. Mrs Alanis 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 1 August 2023 to 31 July 2025, and asked the Registrar to consider exceptional circumstances.

Summary

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

Mrs Alanis first registered with the General Dental Council ("the Council") as a dental care professional, with the titles of dental hygienist and dental nurse, on 18 June 2022. Therefore, in accordance with Rule 1 as set out above, the Appellant'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 the Appellant's registered email address. This reminder notified the Appellant that her CPD year was coming to an end and 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, 7 July 2025, 18 July 2025 and 5 August 2025, the Council sent further email reminders to Mrs Alanis's registered email address, notifying her that her 2024-2025 CPD cycle 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 12, 21 and 28 August 2025, the Council sent SMS reminders to the Appellants registered mobile number. These reminders notified the Appellant that her 2024-2025 CPD Annual Statement was incomplete and directed her to sign onto eGDC and update her statement by 28 August 2025.

The Appellant submitted an annual CPD statement for the 2024-2025 CPD year, declaring that she had completed zero verifiable CPD hours.

Rule 6 notice

The Rule 6 notice stated that, although the Appellant 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. It was noted that she had submitted an annual CPD statement of zero verifiable hours for the 2023-2024 CPD year and an annual CPD statement of zero verifiable hours for the 2024-2025 CPD year. The Rule 6 notice stated that if the Appellant wished to retain her registration, she should submit her CPD Personal Development Plan (“PDP”) and a log of verifiable CPD, with supporting evidence, to the Registrar by 23 October 2025 to demonstrate that she had met the requirement. The Appellant was told to inform the Council if there were any reasons or exceptional circumstances that meant she was unable to submit a compliant statement for the year. The Appellant was informed that if the Council did not receive a response to the Rule 6 notice or if her response was unsatisfactory, she may be erased from the dental care professionals register.

Correspondence with Mrs Alanis

On 22 October 2025, the Appellant wrote to the Council in response to the Rule 6 notice. The Appellant stated that she had met the Council’s CPD requirements and was submitting a full account of her CPD history including a period of maternity leave. She stated that during the period from the end of November 2022 to September 2025 she [IN PRIVATE] did undertake a small number of short online courses. Further, she stated that she had completed 1.5 hours of CPD between August 2024 – July 2025 but due to technical difficulties was unable to add the courses to her eGDC account but that they were recorded on her log and therefore, she asked for these to be considered as part of her CPD record. [IN PRIVATE].

Rule 8 notice

On 5 November 2025, the Council sent a notice under Rule 8 (the “Rule 8 notice”) to the Appellant’s registered address by recorded delivery. Confirmation that the Rule 8 notice was sent by recorded delivery, and confirmation that the Rule 8 notice was delivered on 11 November 2025.

The Rule 8 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 and that 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. The Rule 8 notice noted that 2 hours CPD had been completed between 1 August 2024 -31 July 2025 and that eight hours were outstanding for the two-year period. The other CPD certificates provided by the Appellant were not required (and not relevant) as they were out of cycle. Finally, the letter stated that the Appellant had not provided any evidence of exceptional personal circumstances which may have prevented her from completing her CPD as required.

Notice of Appeal

On 1 December 2025, the Council received a Notice of Appeal (“NOA”) in the form of an email from the Appellant which confirmed that she wished to appeal against

the decision to remove her from the dental care professionals register. The NOA set out the following matters:

- a. There had been exceptional personal circumstances preventing the Appellant from completing the required CPD;
- b. These circumstances were that [IN PRIVATE];
- c. [IN PRIVATE];
- d. The Appellant's circumstances have changed significantly and she has been updating her CPD and is fully committed to maintaining compliance going forward.

On 5 December 2025, the Appellant's CPD evidence was assessed by a Registration Operations Officer. The Appellant was deemed to be non-compliant with her CPD requirements on the basis that she had failed to provide sufficient verifiable CPD hours for the period 1 August 2023 to 31 July 2025 and that 72 CPD certificates provided by the Appellant in support of her appeal were for courses completed outside of the relevant period.

Submissions

13. In its written submissions, the Council's position that the Appellant 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 1 August 2023 to 31 July 2025, in accordance with Rule 2.
14. 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, as set out in detail above.
15. As of 5 December 2025, the Appellant had completed two verifiable CPD hours between 1 August 2023 and 31 July 2025, which clearly breaches the requirement that dental care professionals submit evidence that they have completed a minimum of 10 verifiable CPD hours in each two-year period.
16. It is open to Mrs Alanis 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 Mrs Alanis 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 Mrs Alanis was required to undertake. The Committee was in agreement with the Registrar (and it is not in dispute on appeal) that she was required to complete at least 10 hours of verifiable CPD during her two-year CPD cycle. She is short of 8 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.
19. The Committee was satisfied that Mrs Alanis had not complied with this requirement.
20. The Committee has taken full account of the personal circumstances Mrs Alanis experienced. It noted the number of reminders that were sent by both email and text to Mrs Alanis. The

Committee determined that it was her responsibility to be familiar with the CPD requirements. Having carefully considered Mrs Alanis'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, Mrs Alanis had completed 2 hours of verifiable CPD in the requisite period. The Committee is satisfied that Mrs Alanis was non-compliant with her CPD requirements.

21. The Committee was satisfied that the GDC has complied with the 2017 Rules in dealing with Mrs Alanis's CPD requirements including the serving of the statutory notices on her.
22. The Committee also balanced the interests of Mrs Alanis 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 Mrs Alanis 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 Mrs Alanis in writing.
25. That concludes this determination.