

PUBLIC HEARING**Professional Conduct Committee
Initial Hearing****19 – 21 May 2025****Name:** MOFFAT, Kayleigh Mcapline**Registration number:** 207957**Case number:** CAS-207662-M5P3D4

General Dental Council: Sharmistha Michaels, Counsel.
Instructed by Holly Watt, IHLPS**Registrant:** Not Present
Unrepresented

Fitness to practise: Impaired by reason of misconduct**Outcome:** Erased with Immediate Suspension**Immediate order:** Immediate suspension order

Committee members: Aysha Ahmed-Kibria (Chair, Dentist)
Stacey Firby (Dental Care Professional)
Lynne Vernon (Lay)**Legal adviser:** Julian Weinberg**Committee Secretary:** Jenny Hazell

1. This is a Professional Conduct Committee (PCC) hearing in respect of a case brought against Miss Moffat by the General Dental Council (GDC). The hearing was conducted remotely by Microsoft Teams in line with current General Dental Council (GDC) practice.
2. Miss Moffat is neither present nor represented at the hearing. Ms Michaels, Counsel, appears on behalf of the GDC.

Application to proceed with the hearing in the absence of the registrant

3. At the outset, Ms Michaels submitted that the Notice of Hearing has been served on Miss Moffat in accordance with Rules 13 and 65 of the GDC (Fitness to Practise) Rules Order of Council 2006 (the Rules). She also invited the Committee to proceed with the hearing in the absence of Miss Moffat in accordance with Rule 54.
4. The Committee has taken into account the submissions made by Ms Michaels. It has had regard to the information contained in the GDC's Hearing bundle as well as emails dated 3 April 2025 and 2 May 2025 from Miss Moffat to the GDC. The Committee has accepted the advice of the Legal Adviser on the issues of service and proceeding in the absence of a registrant.

Decision on service

5. The Committee first considered whether the Notice of Hearing had been served on Miss Moffat in accordance with Rules 13 and 65.
6. The Committee has seen a copy of the Notice of Hearing dated 27 March 2025 ('the notice') which was sent to Miss Moffat's registered address by Special Delivery on 27 March 2025. The Committee is satisfied that the address shown on the Notice is the same address as that shown on the GDC's records as Miss Moffat's registered address.
7. The Committee is satisfied that the Notice dated 27 March 2025 contains all the required particulars set out in Rule 13, including the date and time of the hearing, as well as the charge setting out the grounds by reason of which it is alleged that Miss Moffat's fitness to practise as a dental professional is impaired and the facts alleged against her in support of the allegations. The Notice states that the hearing would be held remotely by Microsoft Teams, and that the Committee had the power to proceed with the hearing in the absence of Miss Moffat.
8. The Royal Mail 'Track and Trace' receipt states that the Notice was delivered by Royal Mail Special Delivery to Miss Moffat's registered address on 28 March 2025 and was signed for in the name of 'Moffat'. The Committee is satisfied that the Notice sent to Miss Moffat on 27 March 2025 complies with the 28-day notice period required by the Rules.
9. In addition, a copy of the Notice was emailed via Secure File Share to Miss Moffat's registered email address on 27 March 2025. The Committee has had regards to the emails dated 3 April 2025 and 2 May 2025 from Miss Moffat to the GDC in which she acknowledges receipt of the GDC's email regarding the Notice of Hearing and sets out her reason for her non-attendance at the hearing.

10. On the basis of all the information provided, the Committee was satisfied that the Notice had been served on Miss Moffat in accordance with the Rules.

Decision on whether to proceed with the hearing in the absence of the registrant

11. The Committee next considered whether to exercise its discretion under Rule 54 to proceed with the hearing in the absence of Miss Moffat. It took into account the factors to be considered in reaching its decision, as set out in the case of *R v Jones* [2003] 1 AC 1HL, and as affirmed in the regulatory case of *General Medical Council v Adeogba* [2016] EWCA Civ 162.

12. The Committee is satisfied that Miss Moffat is aware of this hearing and that the Committee has the power to proceed in her absence. It noted Miss Moffat's email to the GDC dated 3 April 2025 in which she states she would not be attending the hearing and she would not be represented. In a subsequent email to the GDC dated 2 May 2025 Miss Moffat reiterated her decision not to attend or engage further in the upcoming hearing. Miss Moffat stated that she intends to remove herself from the GDC register, no matter the outcome of the hearing, as she no longer wishes to practise in the profession. In light of Miss Moffat's recent communications with the GDC, the Committee is satisfied that Miss Moffat has voluntarily absented herself from these proceedings. It has concluded that adjourning the hearing to a later date would serve no meaningful purpose.

13. The Committee bore in mind the need to be fair to Miss Moffat as well as the GDC and the public interest in the expeditious disposal of this case. It considers that the allegations in this case are serious and ought to be determined without undue delay. The Committee is aware that the GDC intends to call four witnesses in support of this case and that they are available to give evidence. Accordingly, the Committee has determined that it was fair and in the public interest to proceed with the hearing in the absence of Miss Moffat.

Summary of the case background

14. Ms Michaels outlined the background to Miss Moffat's case. At the material times Miss Moffat was employed at the Practice as the Practice Manager.

15. On 26 September 2022 Person 3, the Practice Owner, asked Miss Moffat to prepare documents which the British Dental Association (BDA) 'Good Practice Scheme' (GPS) had requested to be sent by 29 September 2022 to show that the Practice's documentation was current and available. The BDA requested a number of policy documents including the "Practice acceptance policy", "Practice Safeguarding Policy" and "Practice Quality Assurance Policy". The practice policies were updated annually and Miss Moffat would have been aware of this as she was the Practice Manager. One of her responsibilities was to make sure the policies were in place and signed.

16. Miss Moffat submitted the documents specified above by 29 September 2022. Around the time when Miss Moffat submitted the documents two members of staff were on holiday – Person 1 and Person 2. Both were on annual leave on Friday 23 September 2022 and the entire week from 26 September 2022 to 30 September 2022. Miss Moffat forged their signatures as well as that of Person 3, even though he was not on holiday.

17. On 4 October 2022 Person 2 informed Person 3 that her signatures had been forged. Later that day Person 3 spoke to Miss Moffat and she accepted that she had forged the signature and expressed regret for her actions.

18. On 13 October 2022 Person 1 informed Person 3 that her signatures had been forged.

19. On 14 October 2022 Person 3 emailed Person 4, an independent HR Consultant about the situation. Person 4 advised Person 3 that they would need to follow a disciplinary procedure. Person 3 carried out the investigation in their role as Investigating Manager. As part of that investigation Person 3 went to the office where Miss Moffat worked and identified the documents which had forged signatures on them. Person 3 discovered on 18 October 2022 that his signature had been forged on the document entitled "Quality Assurance Policy".

20. Person 3 spoke to Miss Moffat about the matter on 18 October 2022. She admitted to Person 3 that she had forged their signature.

21. Person 3 produced an investigation Report dated 19 October 2022. A written notice of a disciplinary hearing dated 20 October 2022 was sent to Miss Moffat. She was advised to seek representation. The allegations against Miss Moffat were in broad terms similar to those set out in allegations 1 and 2 of the Notice of Hearing below.

22. The Disciplinary Hearing took place on 25 October 2022 which was carried out by Person 4. In advance of that Hearing Miss Moffat emailed Person 4 a statement on 23 October 2022. The hearing was digitally recorded and transcribed. The transcript of that meeting record that at the outset of the hearing Miss Moffat accepted that she had forged the signatures on the documents and that it was the "wrong thing to do". The outcome of the meeting was that Miss Moffat was dismissed on the grounds of Gross Misconduct. Miss Moffat was notified of this decision on 26 October 2022.

23. Person 3 notified the GDC of the matter by email dated 17 November 2022. Person 3 also notified the BDA by email dated 21 November 2022 that the signatures of three staff members had been forged by the Practice Manager (Miss Moffat) and that she had been dismissed. The GDC decided to refer the allegations against Miss Moffat to the PCC.

24. The allegations against Miss Moffat are as follows:

1. Whilst employed at the Practice:

- a. On a date on or around 26 September 2022, you forged Person 1's signature on the Practice's Acceptance for treatment Policy and/or Safeguarding Policy and/or the Quality Assurance Policy;*
 - b. On a date on or around 26 September 2022, you forged Person 2's signature on the Practice's Acceptance for treatment Policy and/or the Quality Assurance Policy;*
 - c. On a date on or around 26 September 2022, you forged Person 3's signature on the Practice's Quality Assurance Policy.*
- 2. You submitted one or more of the documents specified at Charges 1.a. and/or, 1.b. and/or 1.c. to the British Dental Association.*
- 3. Your conduct in relation to charge 1 and/or 2 was*
- a. Misleading and/or;*

- b. *Lacking in integrity and/or;*
- c. *Dishonest*

And by reason of the matters alleged above your fitness to practise is impaired by reason of misconduct.”

Evidence

25. The Committee has considered all the evidence before it. This includes the GDC’s hearing bundle which contains statements and exhibits from four witnesses called on behalf of the GDC: Person 3’s signed statement dated 15 November 2024; Person 2’s signed statement dated 19 November 2024; Person 1’s signed witness statement dated 17 November 2024 and Person 4’s signed statement dated 23 November 2024. Each of these witnesses gave oral evidence at the hearing and confirmed that they wished to adopt their statements as their evidence.

26. The Committee considered Person 3, Person 2 and Person 1 to be credible and honest witnesses; their evidence was consistent with the contemporaneous records provided at the time of the internal investigation. It also considered Person 4 to be a credible witness, albeit her evidence was primarily in relation to the Disciplinary Hearing against Miss Moffat that took place on 25 October 2022.

27. The Committee has had regard to Miss Moffat’s responses to the allegations, namely her statement submitted to Person 4 in advance of the Disciplinary Hearing in October 2022, as well as her email to the GDC dated 2 May 2025. In short, Miss Moffat accepted that she made a mistake. She also provided further information in her email dated 2 May 2025 in relation to the working environment at the Practice which she stated she had not provided during the Disciplinary Hearing.

28. The Committee has taken account of the submissions made by Ms Michaels, and has accepted the advice of the Legal Adviser.

29. The Committee has borne in mind that the burden of proof rests with the GDC, and that the standard of proof is the civil standard, that is, whether the factual allegation is proved on the balance of probabilities. Miss Moffat need not prove anything.

30. In respect of allegation 3(b), that the conduct particularised at charges 1 and/or 2 was lacking in integrity, the Committee had regard to the case of *Wingate v SRA* [2018] EWCA Civ 366 which set out the meaning of integrity as follows: *“In professional codes of conduct, the term ‘integrity’ is a useful shorthand to express the higher standards which society expects from professional persons and which the professions expect from their own members...The underlying rationale is that the professions have a privileged and trusted role in society. In return they are required to live up to their own professional standards...Integrity connotes adherence to the ethical standards of one’s own profession. That involves more than mere honesty.”*

31. In respect of allegation 3(c) that the conduct particularised at charges 1 and/or 2 was dishonest, the Committee has applied the legal test for dishonesty, as set out in the case of *Ivey v Genting Casinos (UK) Ltd t/a Crockfords* [2017] UKSC.

Findings of Fact

32. The Committee has made the following findings:

1a.	<p><i>Whilst employed at the Practice:</i> <i>On a date on or around 26 September 2022, you forged Person 1's signature on the Practice's Acceptance for treatment Policy and/or Safeguarding Policy and/or the Quality Assurance Policy;</i> Found proved</p> <p>In reaching its decision, the Committee has had regard to Person 1's evidence. Her account was that on her return from leave on 3 October 2022 she was asked by Person 2 whether the signatures on certain documents were hers. Person 2 showed Person 1 the documents which were practice policies. Person 1's evidence was: "I looked at the documents and I could see the signatures were not mine. As I was not present at the Practice and away on holiday when the documents were dated, and the spelling of my signatures were incorrect as well."</p> <p>Person 1 explained that she was asked by Person 3 if she had signed the three practice policy documents; the first document (Quality Assurance Policy) is dated 17 March 2022. Person 1 confirmed that the signature purporting to be hers was not hers. The second document was the Practice's Acceptance for treatment Policy, dated 27 September 2022. Person 1 again confirmed that the signature purporting to be hers was not hers. The third document was the Practice's Safeguarding Policy. Person 1's evidence was that it was not her signature on the document and the spelling of her signature was incorrect.</p> <p>Person 1 was taken by Ms Michaels to the above three documents during the course of Person 1's evidence. Person 1 confirmed that the three documents purporting to contain her signatures were not her signatures.</p> <p>The Committee found Person 1's evidence to be credible.</p> <p>The Committee has also had regard to the transcript of Miss Moffat's Disciplinary Tribunal dated 25 October 2022 in which she accepted that she had forged Person 1's signature on the three documents. She confirmed that she had forged the signature in her email to the GDC dated 2 May 2025.</p>
1b.	<p><i>On a date on or around 26 September 2022, you forged Person 2's signature on the Practice's Acceptance for treatment Policy and/or the Quality Assurance Policy.</i> Found proved</p> <p>In reaching its decision, the Committee has had regard to Person 2's evidence. Person 2's evidence was that she was on leave from the Practice from 23 September until 3 October 2022. She explained that on the first day back from leave (4 October 2022), or shortly after, she recollected seeing a single document with her signature on it. She noted that the it was not her signature on the document, although it had been signed in her name.</p>

	<p>Person 2 went on to explain that on seeing the document she approached Miss Moffat in the Practice on the same day she saw the document. On Person 2's account, she asked Miss Moffat what the document was for and was told by Miss Moffat that it was for the British Dental Association (BDA) good practice scheme, and that she was given to do the task last minute by Person 3.</p> <p>Person 2's evidence was that she spoke to Person 3 about the matter because she was not happy with the situation. Her evidence was at some point either the same day or later that week, Person 3 showed her another document which had a signature contained on it and she told Person 3 that her signature had been forged.</p> <p>Person 2 set out in her witness statement that the GDC sent her documents, one called an "Acceptance for Treatment Policy" (dated 27 September 2022). She confirmed that she did not sign the document and she did not recognise the signature. Person 2's evidence was there was a spelling mistake in the signature.</p> <p>The second document was called "Quality Assurance document" (dated 17 March 2022). She confirmed that she had reviewed the document, and she did not sign the document nor did she recognise the signature.</p> <p>Person 2 was taken by Ms Michaels to the above three documents during the course of Person 2's evidence. Person 2 confirmed that the two documents purporting to contain her signatures were not her signatures.</p> <p>The Committee found Person 2's evidence to be credible.</p> <p>The Committee has also had regard to the transcript of Miss Moffat's Disciplinary Tribunal dated 25 October 2022 in which she accepted that she had forged Person 2's signature on two documents. She confirmed that she had forged the signature in her email to the GDC dated 2 May 2025.</p>
1c.	<p><i>On a date on or around 26 September 2022, you forged Person 3's signature on the Practice's Quality Assurance Policy.</i> Found proved</p> <p>In reaching its decision, the Committee has had regard to Person 3's evidence. Person 3's evidence was that he realised on 18 October 2022 his signature had been forged on the document entitled "Quality Assurance Policy" upon commencing the investigation procedure and looking at their investigation report. Person 3's evidence was that the signature was written in a way that he would not have signed it. Further, Person 3's evidence was that he spoke to Miss Moffat about the matter on 18 October 2022 and she admitted to Person 3 that she had forged his signature.</p> <p>Person 3 was taken by Ms Michaels to the above document during the course of Person 3's evidence. Person 3 confirmed that the document purporting to contain his signature was not his signature.</p> <p>The Committee found Person 3's evidence to be credible.</p>

	<p>The Committee has also had regard to the transcript of Miss Moffat's Disciplinary Tribunal dated 25 October 2022 in which she accepted that she had forged Person 1's signature on one document. She confirmed that she had forged his signature in her email to the GDC dated 2 May 2025.</p>
2	<p><i>You submitted one or more of the documents specified at Charges 1.a. and/or, 1.b. and/or 1.c. to the British Dental Association.</i> Found proved</p> <p>The Committee has accepted Person 3's evidence that on 26 September 2022 he asked Miss Moffat to prepare documents to be sent to the BDA and Miss Moffat informed him that she had submitted the documents specified towards the end of September 2022. Even though there is no direct evidence to confirm that Miss Moffat did submit the documents to the BDA, it has drawn the inference, based on her responses given at the Disciplinary Tribunal and what she told Person 2 on or around 4 October 2022 when asked about the documents, that she submitted the documents specified above to the BDA on or before 29 September 2022.</p>
3a	<p><i>Your conduct in relation to charge 1 and/or 2 was Misleading and/or;</i> Found proved</p> <p>In reaching its decision, the Committee considers that Miss Moffat's actions had the inherent capacity of misleading the BDA into believing that the documents in question had been read and signed by the members of staff when this was not the case.</p>
3b	<p><i>Lacking in integrity and/or;</i> Found proved</p> <p>The Committee, in applying the principles set out in <i>Wingate v SRA</i>, considers that Miss Moffat's deliberately misleading conduct, by its very nature, is likely to call into question her integrity. Miss Moffat was in a position of seniority and trust as the Practice Manager and would have been expected to ensure that the documents submitted to the BDA as part of the Practice's GPS contained accurate information. In the Committee's judgement, forging the signatures of her colleagues and then submitting to the BDA in the knowledge that the signatures were false lacked integrity.</p>
3c	<p><i>Dishonest</i> Found proved</p> <p>The Committee first considered Miss Moffat's state of mind at the time when she forged Person 1, Person 2 and Person's 3 signatures on the documents and then submitted the documents to the BDA. It is satisfied that Miss Moffat knew that she had forged their signatures before submitting them to the BDA. She accepted in her statement before the Disciplinary Hearing, and at the actual Disciplinary Hearing, that she knew that the documents were not signed by all members of staff and that she "did something which was very out of character and I wholly regret". Miss Moffat accepted that she forged the signatures. She also accepted that she had been "thinking over</p>

and over again” why she did it and that she “panicked” because the documents were not up to date.

The Committee considered that ordinary decent people, appraised of the facts in this case, would conclude that Miss Moffat’s conduct in forging the signatures of three colleagues on the various Policy documents and then submitting them to the BDA in the knowledge that they had not been signed by those colleagues was clearly dishonest.

33. The hearing moves to Stage Two.

Stage 2 - Determination on misconduct, current impairment and sanction

34. In accordance with Rule 20, the Committee heard submissions from Ms Michaels, on behalf of the GDC, in relation to the matters of misconduct, impairment and sanction.

35. The Committee was informed by Ms Michaels that the GDC had sent an email to Miss Moffat, enclosing a copy of the Committee’s determination on findings of fact. Miss Moffat was given an opportunity to make submissions at this stage of the proceedings. Ms Michaels confirmed that no response had been received by Miss Moffat during the lunch time adjournment.

36. The Committee has considered all the evidence presented to it, both oral and documentary. It has taken into account the submissions made by Ms Michaels. Throughout its deliberations the Committee has had regard to the GDC’s “*Guidance for the Practice Committees, including Indicative Sanctions Guidance*” (October 2016, updated December 2020) (the Guidance). The Committee has accepted the advice of the Legal Adviser.

Fitness to practise history

37. Ms Michaels confirmed that Miss Moffat has no fitness to practise history.

Summary of submissions

38. Ms Michaels submitted that the findings against Miss Moffat, including findings of lacking in integrity and dishonesty, are serious and amount to misconduct. She highlighted that Miss Moffat knowingly forged the signatures of three of her colleagues on documents on six occasions. Miss Moffat then submitted the documents to the British Dental Association (BDA) as part of its ‘Good Practice Scheme’ (GPS) on or around 29 September 2022. Ms Michaels submitted that Miss Moffat did not admit what she had done until she was found out by another colleague (Person 2), and even then she only admitted that she had forged Person 2’s signature. Miss Moffat did not admit the full extent of her forgery until later on when Person 3 asked her about the signatures on the documents.

39. Ms Michaels invited the Committee to have regard to a number of the GDC’s ‘Standards for the Dental Team’ which she said Miss Moffat has breached.

40. Ms Michaels submitted that Miss Moffat’s fitness to practise is currently impaired by reason of misconduct. She submitted that Miss Moffat’s dishonest conduct was serious because although it related to one episode, it involved repeated acts of forging the

signatures of three colleagues on important documents. She then knowingly submitted the documents to the BDA – which had a potentially damaging effect on the integrity of the process of the GPS.

41. Ms Michaels acknowledged that Miss Moffat has shown some remorse into her actions, as demonstrated by her apology in her statement of October 2022, provided ahead of her Disciplinary Hearing on 25 October 2025. However, the GDC's position is that Miss Moffat has not provided any evidence of any recent steps she has taken to address the matters identified in this case, or any reflection as to how her actions might impact on others and the reputation of the profession. Ms Michaels submitted that Miss Moffat's statement to the GDC dated 2 May 2025 demonstrates her lack of insight into the seriousness of her actions in that she attempted to blame others.

42. In short, Ms Michaels submitted that the risk of repetition of the dishonest conduct remains and that a finding of current impairment is necessary on both the personal and public limbs of impairment. She invited the Committee to have regard to limbs b, c and d as set out in the decision in *CHRE v Nursing and Midwifery Council, Paula Grant [2011] EWHC 927 Admin*, where the observations of Dame Janet Smith in her 5th Shipman Report as to how to approach the question as to whether a Registrant's fitness to practise is impaired were set out. These were as follows: whether the Dr:

- “a. has in the past acted and/or is liable in the future to act so as to put a patient or patients at unwarranted risk of harm; and/or*
- b. has in the past brought and/or is liable in the future to bring the medical profession into disrepute; and/or*
- c. has in the past breached and/or is liable in the future to breach one of the fundamental tenets of the medical profession; and/or*
- d. has in the past acted dishonestly and/or is liable to act dishonestly in the future.”*

43. Ms Michaels submitted that the appropriate and proportionate sanction in this case is to direct that Miss Moffat's name be erased from the register. She highlighted the serious nature of the dishonesty. Ms Michaels also submitted that the absence of any evidence of remorse or remediation, as well as Miss Moffat's acceptance that she had forged the signatures only came about once she had been found out, were aggravating features of this case which points to the sanction of erasure.

Misconduct

44. The Committee first considered whether the facts found proved amount to misconduct. It has exercised its own independent judgement.

45. The Committee found proved that whilst employed at the Practice on a date on or around 26 September 2022, Miss Moffat forged the signatures of three colleagues - Person 1, Person 2 and Person 3 on various Practice documents on six occasions. Miss Moffat then submitted the documents to the British Dental Association (BDA) 'Good Practice Scheme' (GPS) on or around 29 September 2022.

46. The Committee takes a serious view of Miss Moffat's conduct. She knowingly falsely replicated the signature of three colleagues on Practice policies without their knowledge or consent. As a result they were unable to verify whether they agreed with the content of the documents submitted. This placed the Practice in a compromised position with respect to the BDA's GPS. The Committee considers that an aggravating feature was that Miss Moffat

only admitted what she had done when asked about it by Person 2 on 4 October 2022. Even then, Miss Moffat only admitted that she had forged Person 2's signature and not Person 1 or Person 3's signatures. She only admitted forging Person 1 and Person 3's signature when asked about it later on.

47. The Committee considers that Miss Moffat has breached one of the fundamental tenets of the dental profession – namely to be honest and act with integrity (Standard 1.3). It further considers that Miss Moffat has breached the following GDC's Standards for the Dental Team:

- 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.
- 6.6 You must demonstrate effective management and leadership skills if you manage a team.
- 9.1 You must 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.

48. The Committee considers that Miss Moffat's dishonest conduct, which occurred within the course of her professional practice, in a trusted position as the Practice Manager, can properly be regarded as "deplorable" by fellow practitioners. Such conduct is highly damaging to public confidence in the dental profession. Accordingly, the Committee has concluded that the facts found proved are sufficiently serious to amount to misconduct.

Current impairment

49. The Committee next considered whether Miss Moffat's fitness to practise is currently impaired by reason of her misconduct. In doing so, the Committee has again exercised its own independent judgement.

50. 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.

51. The Committee considers that Miss Moffat's dishonest conduct is attitudinal in nature and therefore difficult to remediate. The Committee has considered carefully Miss Moffat's statement to the GDC dated 2 May 2025 in which she states that she will not attend or engage further in the GDC proceedings against her. She acknowledged that she made a mistake and has since moved forward in her life with honesty and integrity.

52. Miss Moffat also sets out the circumstances in which she was working at the Practice at the material times, which she described were "difficult" and where there were problems within the Practice which were "much larger" than what happened with herself. Miss Moffat also raised concerns regarding some of the Practice's internal document procedures. However, there was no evidence provided by Miss Moffat to support these contentions. The

Committee considers that Miss Moffat's response demonstrates her lack of insight into the seriousness of her actions as well as her attempts to deflect the blame onto others.

53. The Committee has also borne in mind the limited evidence of reflection or insight from Miss Moffat in relation to the matters that form the subject of the GDC's inquiry against her, or how she might act differently in the future. The Committee was therefore not satisfied that there would not be a repeat of the conduct.

54. The Committee considered whether Miss Moffat's dishonest actions pose a risk to patients. However, the Committee was mindful that no patient harm was caused, and the evidence before the Committee suggested that any harm likely to be caused by Miss Moffat's dishonesty would be reputational rather than posing a risk to patients. It therefore did not reach a finding of current impairment on the grounds of public protection.

55. However, the Committee considers that a finding of impairment on the grounds of misconduct is required to maintain public confidence in the profession and to declare and uphold proper professional standards of conduct and behaviour. Miss Moffat's actions were liable to have brought the reputation of the dental profession into disrepute and has in the past breached and is liable in the future to breach one of the fundamental tenets of the dental profession; and has in the past acted dishonestly and is liable to act dishonestly in the future given Miss Moffat's lack of meaningful insight and demonstrable evidence that she has remediated her dishonest conduct. 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 in the public interest given the serious nature of Miss Moffat's dishonest conduct.

56. Accordingly, the Committee finds that Miss Moffat's fitness to practise is currently impaired by reason of her misconduct.

Sanction

57. The Committee went on to consider what sanction, if any, is appropriate in light of the findings of misconduct and current impairment. 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.

58. In reaching its decision the Committee has kept in mind the GDC's *Guidance*. The Committee has applied the principle of proportionality, balancing the public interest with Miss Moffat's own interests. It has borne in mind Miss Moffat's stated intention that she no longer wishes to practise in the dental profession.

59. The Committee has considered the aggravating and mitigating factors present in this case. In terms of the aggravating factors, the Committee had regard to the finding of dishonesty which involved the forgery of the signatures of three colleagues on six occasions, the absence of any evidence of steps taken by Miss Moffat to avoid a repetition of the conduct, the breach of trust, being a senior member of the dental team, as well as her lack of insight. In respect of the mitigating factors that are present, the Committee notes that Miss Moffat has no previous fitness to practise history and her acknowledgement to the GDC dated 2 May 2025 that she made a mistake.

60. 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 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. The Committee also considers that taking no action or issuing a reprimand would not be sufficient to declare and uphold proper professional standards of conduct and behaviour.

61. The Committee also considers that a direction of conditional registration would not be sufficient to meet the public interest considerations engaged in this case, given the serious nature of Miss Moffat's dishonest conduct. Further, it considered that conditions could not be formulated that could address her dishonest behaviour.

62. The Committee then went on to consider whether a direction of suspension would represent an appropriate and proportionate outcome. After careful consideration the Committee has determined that suspension would not be sufficient to meet the public interest considerations that it has identified above.

63. Miss Moffat's dishonest conduct represents a serious departure from professional standards and is highly damaging to her fitness to practise. In the Committee's judgement, Miss Moffat's dishonest conduct was particularly serious, in that it was associated with her professional practice and it involved repeated acts of forging colleagues' signatures. The Committee considers that Miss Moffat's email dated 2 May 2025 to the GDC appears to deflect the blame onto some of her colleagues. It considers that Miss Moffat's response raises concerns about her insight into the seriousness of her actions and how this might impact on the profession.

64. The Committee has had regard to paragraph 59 of the GDC's Guidance which states: "Patients, employers, colleagues and the public should be able to rely on a dental professional's honesty and trustworthiness. Dishonesty, particularly when associated with professional practice, is highly damaging to the dental professional's fitness to practise and to public confidence in the profession."

65. The Committee considers that its finding of dishonesty, together with Miss Moffat's lack of reflection and insight, suggests a deep-seated professional attitudinal problem. Miss Moffat's conduct amounts to a serious departure from the relevant professional standards. Moreover, the Committee considers that a period of suspension would not be sufficient to protect the wider public interest.

66. The Committee has therefore determined that the only appropriate and proportionate sanction to impose in the particular circumstances of this case is that of erasure. The Committee hereby directs that Miss Moffat's name be erased from the Register.

67. The Committee now invites submissions as to whether an immediate suspension order should be imposed to cover the 28-day appeal period.

Decision on immediate order

68. Ms Michaels made an application for an immediate suspension order to be imposed on Miss Moffat's registration. She invited the Committee to impose such an order on the grounds that immediate action is required to protect public confidence in the profession.

69. The Committee has accepted the advice of the Legal Adviser. It has had regard to the paragraphs 6.35 to 6.38 of the GDC's "*Guidance for the Practice Committees, including Indicative Sanctions Guidance*" (October 2016, updated December 2020) (the Guidance).

70. Given the serious nature of its earlier findings, the Committee is satisfied that an immediate suspension order is necessary to protect public confidence in the profession. To do otherwise would be incompatible with the Committee's earlier findings. The Committee understands from the information before it that Miss Moffat is not currently working as a dental professional. However, there is nothing currently in place during the appeal period, should Miss Moffat wish to return to practise during that time. The Committee has therefore determined to make an immediate order of suspension.

71. This means that the immediate suspension order will remain in place for at least 28 days from the date on which Miss Moffat is deemed to have been served with the Committee's decision. If an appeal is made, it will remain in place until the appeal has concluded. If no appeal is made, the substantive direction of erasure will replace the immediate suspension after 28 days.

72. The Committee's decision will be confirmed to Miss Moffat in writing, in accordance with the Act.

73. That concludes this determination.