

## ON PAPERS

### Registrations Appeal Hearing CPD Appeal Hearing

20 April 2026

**Name:** THOMPSON, William Ray

**Registration number:** 138086

**Case number:** CAS-213864-V4M4C4

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**General Dental Council:** Lauren Francis, ILAS

**Registrant:** Unrepresented

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**Outcome:** Appeal dismissed

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**Committee members:** Harpreet Ark (Chair, Dentist member)  
Clive Powell (Lay member)  
Jodie Mahoney (Dental Care Professional member)

**Legal adviser:** Jenny Appleton

**Committee Secretary:** Sara Page

1. This is an appeal hearing before the Registration Appeals Committee (RAC). The appeal is against the decision of the Registrar of the General Dental Council (GDC) to erase Mr Thompson 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 Mr Thompson 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 Mr Thompson had made no such request.
4. Notification of this appeal was sent to Mr Thompson by Recorded Delivery and secure email on 6 March 2026 in accordance with Rule 5 of the Registration Appeal Rules. Further documentation was sent to Mr Thompson on 19 March inviting him to submit any further evidence for consideration by the RAC no later than 13 April 2026. The Committee noted that no additional submissions or evidence were received and Mr Thompson has not requested an oral hearing.
5. The Committee was satisfied that it was appropriate to consider today's appeal in the absence of either party and on the papers.

### **Decision and reasons on the appeal**

#### **Background**

6. '*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.
7. The CPD Rules came into force on the 1 January 2018 and took effect in respect of dental care professionals on 1 August 2018.
8. 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.
9. Mr Thompson appealed against the Registrar's decision that his CPD is non-compliant because he failed to provide a compliant CPD record demonstrating that he had met the minimum requirement for the period 1 August 2023 – 31 July 2025.

### Case summary

10. The GDC's case in support of its decision was summarised as follows:
11. Mr Thompson first registered with the General Dental Council ("the Council") as a dental care professional, with the title dental technician, on 13 March 2008. Therefore, in accordance with Rule 1 as set out above, Mr Thompson's current CPD cycle began on 1 August 2023 and will end on 31 July 2028.
12. On 22 May 2025, the Council sent an email reminder to Mr Thompson's registered email address. This reminder notified Mr Thompson that his CPD year was coming to an end and reminded him that he was required to submit his CPD statement, detailing how many CPD hours he had completed during that year, by 28 August 2025. Mr Thompson was advised that if he did not submit a compliant statement before the deadline, his registration may be put at risk.
13. On 10 June 2025, the Council also sent Mr Thompson an Annual Renewal Notice letter by post to his 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 to make their indemnity declaration. Mr Thompson was also reminded in this notice that he was required to submit his CPD statement by 28 August 2025. It was stated that Mr Thompson would need to have completed at least ten hours of CPD over the last two years.
14. Between 12 June and 28 August 2025, the Council sent numerous reminders to Mr Thompson regarding his CPD requirements.

### Rule 6 notice

15. On 25 September 2025, the Council sent a notice under Rule 6 to Mr Thompson by recorded delivery to his registered address at that time. The notice stated that, although Mr Thompson had submitted a CPD statement to the Council, he had not declared enough hours to meet the requirement to complete a minimum of ten hours of CPD over two consecutive years. It was noted that he had submitted an annual CPD statement of zero verifiable hours for the 2023-2024 CPD year and an annual CPD statement of one verifiable hour for the 2024-2025 CPD year. The notice stated that if Mr Thompson wished to retain his registration, he should submit his CPD record to the Registrar by 23 October 2025 in order to demonstrate that he had met the requirement.
16. Mr Thompson was informed that if the Council did not receive a response to the notice or if his response was unsatisfactory, he may be erased from the dental care professionals register. Additionally, Mr Thompson was informed that if there were any reasons, or exceptional circumstances, that meant that he had been unable to submit a compliant statement this year, he should inform the Council, so that his circumstances could be taken into consideration when deciding whether to take any further action. Mr Thompson was given details of what documentary evidence was required and the contact details of who to contact should he require further explanation.

### Rule 8 notice

17. On 5 November 2025 the Council sent a Rule 8 notice to Mr Thompson's registered address by recorded delivery. This notice confirmed that Mr Thompson had failed to provide a compliant CPD record demonstrating that he 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 his name from the dental care professionals register for non-compliance with the Rules. Mr Thompson was informed that he had failed to provide a compliant CPD record demonstrating that he had met the minimum requirement for the period 1 August 2023 – 31 July 2025. Additionally, he had failed to provide any evidence of his CPD record relating to the relevant cycle, nor any evidence of any exceptional personal circumstances which may have prevented him from completing his CPD as required. Mr Thompson was notified that unless an appeal was submitted, the Registrar's decision would take effect on 5 December 2025.

#### Notice of Appeal

18. On 28 November 2025, the Council received a Notice of Appeal ("NOA") via post from Mr Thompson which confirmed that he wished to appeal against the decision to remove his from the dental care professionals register and his NOA was accompanied by various CPD certificates.
19. On 1 December 2025, Mr Thompson's CPD evidence was assessed by an Operations Officer. Mr Thompson was deemed to be non-compliant with his CPD requirements on the basis that:
  - He is outstanding ten verifiable CPD hours; and
  - He failed to provide a Personal Development Plan or Activity Log; and
  - The 19 FMC certificates provided were completed outside of his CPD cycle.
20. It was confirmed that, as of 1 December 2025, Mr Thompson had completed zero verifiable CPD hours between 1 August 2023 to 31 July 2025.

#### **Submissions**

21. In Mr Thompson's NOA, it was submitted that due to securing a new job and premises, he did not receive the Council's letter but also missed the Council's email correspondence in September. Additionally, he forgot to update and change his registered postal address.
22. Mr Thompson expressed his intention to continue to undertake any CPD in order to maintain his registration, which was needed for the purposes of his new job.
23. In its written submissions, the GDC submitted that Mr Thompson is non-compliant with the CPD requirements because he has failed to provide a CPD record demonstrating that he has completed the minimum requirement for the period 1 August 2023 to 31 July 2025, in accordance with Rule 2.
24. It is submitted by the Registrar that Mr Thompson was reminded on numerous occasions of the need to complete his CPD hours and of the requirement to complete ten verifiable CPD hours in each two-year period, as set out in detail above. It is also Mr Thompson's responsibility to ensure that his contact details are kept up-to-date.
25. 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.

26. The GDC confirmed that as of 1 December 2025, Mr Thompson had completed zero 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 ten verifiable CPD hours in each two-year period, even across two CPD cycles.

### **Committee's decision and reasons**

27. 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 Mr Thompson in his NOA. It heard and accepted the advice of the Legal Adviser who referred to the GDC document, '*Guidance on the Registrar's Discretion to Erase for CPD Non-Compliance (February 2024)*'.
28. The Committee noted that Mr Thompson has provided some 19 certificates of CPD activity that are outside of the relevant CPD cycle. In this regard, the Committee considered that Mr Thompson has not provided any evidence of verifiable CPD hours during the relevant cycle and is therefore outstanding ten CPD hours for the period of 1 August 2023 – 31 July 2025.
29. In addition, Mr Thompson has not provided his Personal Development Plan or activity log, as required.
30. In the Committee's consideration of Mr Thompson's NOA, in particular his reasons for failing to comply with his CPD requirements, it determined that he has not provided any evidence of exceptional circumstances that would have prevented him from meeting his CPD requirements. The Committee noted that there is a professional obligation for all registrant's to maintain their contact details on the Register and Mr Thompson has failed to do so, despite the numerous reminders sent by the GDC via SMS and email.
31. In all the circumstances, the Committee concluded that Mr Thompson has not complied with his CPD requirements and that there are no exceptional circumstances.
32. Accordingly, the appeal is dismissed. The Committee wished to remind Mr Thompson that it is open to him to apply for the restoration of his name to the Register upon completion of the required number of CPD hours.
33. Unless Mr Thompson exercises his right of appeal to the County Court (if their address is in England or Wales) or the sheriff in whose shireffdom 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 Mr Thompson to apply for the restoration of his name if he meets the CPD and other requirements for restoration.
34. This will be confirmed to Mr Thompson in writing.
35. That concludes this determination.