PUBLIC HEARING

Registration Appeals Committee
(Registration Appeal Hearing)

23 October 2026

Name:	ZULFIQAR, Nouman
Case number:	CAS-216189-F2F5Q4

General Dental Council:	Eleanor Curzon, Counsel. Instructed by Rochelle Williams, ILPS
Registrant:	Present Unrepresented

Outcome:	Appeal dismissed

Committee members:	Helen Wagner (Lay) (Chair) Annika Hindocha (Dentist) Emma Haywood (Dental Care Professional)
Legal adviser:	Alain Gogarty
Professional Adviser:	Malcolm Smith
Committee Secretary:	Andrew Keeling

Mr Zulfiqar,

1. This Registration Appeal Committee was convened to consider your appeal against the decision of the Registrar of the General Dental Council (GDC) that you are not currently eligible for registration as a Clinical Dental Technician (CDT) in the UK. You attended the hearing, but you were not represented. Miss Eleanor Curzon, Counsel, appeared on behalf of the GDC. The hearing was held remotely on Microsoft Teams.

Legal Framework

The Dentists Act 1984 (as amended) ("the Act")

2. Section 36C of the Act sets out the relevant requirements for qualification for registration in the dental care professionals register. Sections 36C (1) - (2) and (4) and (6) states the following:

(1) Subject to the provisions of this Act, a person shall be entitled to be registered under a particular title in the dental care professionals register if he satisfies the registrar—

(a) of matter A or C, and
(b) of matter D.

(2) Matter A is that the person holds a qualification or qualifications approved by the Council under section 36D(2) in relation to the profession, or class of members of a profession, to which the title applies.

(3) …

(4) Matter C is that the person—

(a) holds a qualification or qualifications [other than a diploma in dentistry] granted by an institution or institutions outside the United Kingdom relevant to the profession complementary to dentistry, or class of members of such a profession, to which the title applies (in this section referred to as "relevant qualifications"); and

(b) has satisfied the Council that he has the requisite knowledge and skill to practise as a member of the profession or class to which the title applies.

(4A) Subsection (4)(b) does not apply to a person whose application for registration is made in reliance on a relevant qualification that—

(a) was granted in a relevant European State, and

(b) demonstrates, in the opinion of the Council, a comparable level of knowledge and skill to that demonstrated by a qualification approved (or qualifications together approved) in respect of the same profession or class under section 36D(2).

(4B) Subsection (4)(b) does not apply to a person whose application for registration is made in reliance on a relevant qualification that is a specified state qualification or relevant qualifications that are specified state qualifications where–

(a) the relevant qualification demonstrates or the relevant qualifications taken together demonstrate, in the opinion of the Council, a comparable level of knowledge and skill to that demonstrated by a qualification approved (or qualifications together approved) in respect of the same profession or class under section 36D(2), or
(b) the person has met the requirement specified in relation to the person under subsection (4E).

(5) …

(6) Matter D is—

(a) the person's identity;

(aa) that he has the necessary knowledge of English;

(b) that he is of good character; and

(c) that he is in good health, both physically and mentally.

3. Section 36CB gives the Council the power to make Rules to determine whether a person who holds a relevant qualification has the requisite knowledge and skill as set out in Section 36C(4)(b) as follows:

36CB(1) Rules may make provision for the purpose of determining whether a person who holds a relevant qualification has the requisite knowledge and skill mentioned in section 36C(4)(b).

(2) Rules made by virtue of subsection (1) may (in particular) make provision–

(a) requiring the person to undertake an assessment;

b) imposing such other requirements on the person as the Council considers appropriate;

(c) enabling the Council to require the payment of fees for the purpose of meeting expenses incurred, or to be incurred, by the Council in

determining whether the person has the requisite knowledge and skill.

(3) In this section "relevant qualification" has the same meaning as in section 36C (see section 36C(4)(a)).

4. On 08 December 2023 (effective from 09 March 2024) the Council made the General Dental Council (Dental Care Professionals) (International Registration) Rules 2023 in exercise of their powers conferred by Section 36C(4) and 50C of the Act.

5. The General Dental Council (Dental Care Professionals) (International Registration) Rules 2023 sets out the standards to be shown by applicants in order to satisfy the Registrar that they possess the requisite knowledge and skill in accordance with Section 36C(4)(b) of the Act as follows:

'3. Standard to be shown to satisfy the registrar of the requisite knowledge and skill in accordance with section 36C(4) of the Act

(1) A person must demonstrate, in the opinion of the Council, a comparable level of knowledge and skill to that demonstrated by a qualification that the Council has approved (or qualifications together that the Council has approved) in respect of the same profession or class under section 36D(2) of the Act.

(2) The Council may specify in a determination that a person must perform to the satisfaction of the Council in a test of assessment specified in the determination.

4. Requisite knowledge and skill

(1) A person may seek to demonstrate to the Council that they have a

comparable level of knowledge and skill pursuant to paragraph 3(1) by providing information and evidence for the Council to take into account, of:

(a) relevant qualifications;

(b) relevant knowledge and experience, wherever acquired; and

(c) by performing to the satisfaction of the Council in any test or assessment specified in the determination.

6. The matters under consideration in this appeal are whether you hold a relevant qualification granted by an institution outside of the United Kingdom and whether you possess the requisite knowledge and skill to practise as a CDT.

7. Your application for registration as a Clinical Dental Technician is made under Matter C and was originally received on 27 November 2025. You are relying on a Bachelor of Science degree in Dental Technology obtained in 2016 at the FMH College of Medicine and Dentistry, Pakistan. You are currently registered with the Council as a Dental Technician (DT).

8. The Council applied Section 36C(4)(a)-(b) to assess whether you have the requisite knowledge and skills to practise as a member of the profession of class to which the title applies.

9. When determining whether an applicant has the requisite knowledge and skill, the Council is required under Rule 4(1) of the 2023 Rules to take into account all the applicant's relevant qualifications, and all relevant knowledge or experience, wherever acquired.

Background

10. On 27 November 2025, the Council received your application for registration as a CDT.

11. On 5 January 2026, the Council and you exchanged correspondence via email and the Council confirmed that your application had been listed in the February 2026 assessment panel.

Assessment of applications and decisions

Initial Panel assessment and Registrar's decision dated 6 February 2026

12. Three assessors formed the Registration Assessment Panel ("the Panel") on 4 February 2026 and conducted an assessment of your application. In considering the CDT application, the Panel noted that you did not hold the required CDT qualification.

13. The Council wrote to you on 6 February 2026 to inform you that your application was in the process of being reviewed by the Panel. You were advised that your primary qualification, which was assessed in 2017 and led to your registration as a Dental Technician, did not meet the educational requirements for registration as a CDT. You were advised that registration as a CDT requires completion of an approved CDT qualification and that as no such qualification had been provided with his application, the Panel were unable to determine that you meet the criteria for registration in this category. You were advised that in order for the assessment of your application to be completed, you should provide a certified copy of your CDT qualification and a validated course syllabus relating to the CDT qualification ensuring it relates to the period of your study. You were advised to confirm whether you were able to provide the specified information by 13 February 2026 and if you were able to provide the information, to do so by 20 February 2026.

14. On 10 February 2026, you sent an email to the Council acknowledging receipt of the decision letter and stating that you had requested further information from your institution and that they would email this directly once ready.

15. On 12 February 2026, the Council received an email from a professor at the Department of Science of Dental Materials, Coordinator of Dental Technology of FMH College of Medicine and Dentistry which attached a letter titled *'Summary statement BSc (Hons) Dental Technology – Academic and Professional Relevance'* dated 12 February 2026.

16. On 3 March 2026, the Council acknowledged the professor's email and provided a copy of the syllabus which was provided by you in support of your application to register as a CDT. The Council requested that it be directed to the areas, topics and/or subjects in the syllabus which meets the competencies and teachings of the CDT qualification by 20 March 2026.

17. On 11 March 2026, the professor responded requesting that the Council specify the particular competencies and/or teachings of the CDT role that require direction in order to provide a response. The Council considered that sufficient information had been provided to clarify what further information was required. The Council acknowledge that a response was not sent to the email dated 11 March 2026.

Second panel assessment and Registrar's decision dated 8 April 2026

18. On 8 April 2026, the Panel conducted a reassessment of your application.

19. Having considered your CDT application, the Panel did not recommend entry onto the register, as the evidence provided by you did not demonstrate that you held the relevant qualification or possessed the requisite knowledge and skill to be eligible for registration as a CDT.

20. The Panel detailed a number of learning outcomes which appeared not to have been covered as part of your training or professional experience.

21. The Council relied on the recommendation of the Panel and made the decision to refuse your application for registration as a CDT in the DCP register. The Council wrote to you on 12 May 2026 with the outcome of the assessment. The letter stated that while your primary qualification led to your registration as a Dental Technician (in 2017), it does not meet the educational requirements for registration as a CDT. You were advised that registration as a CDT requires completion of an approved CDT qualification.

22. You were advised that should you wish to reapply for registration as a CDT, you should ensure that you have the relevant qualification. You were informed of your right to appeal the decision by 12 June 2026.

23. On 26 May 2026, you sent an email to the Council raising concerns about the assessment process. The content of the email is repeated in your Notice of Appeal which is addressed below.

Notice of Appeal

24. In light of this decision, on 11 June 2026, you submitted a Notice of Appeal ("NOA") which set out your reasons for appealing.

25. Within the NOA, you stated that you had been unable to locate the original decision letter relating to your application and that the only formal decision letter you had received was dated 12 May 2026. You raised the following in relation to the assessment of your application:

    i. your professor had contacted the Council seeking clarification in relation to the requirements of his application but that no response was provided;

    ii. not being provided with the opportunity to remedy or clarify any perceived deficiencies and your right to reassessment being removed without you having sight of, or an opportunity to respond, had placed you at a procedural disadvantage.

26. You requested a copy of the original decision and a response to the points raised.

Oral Evidence and Submissions

27. Miss Curzon, on behalf of the GDC, took the Committee through the background and legal framework in respect of this case. She also referred the Committee to the written case summary provided by the GDC. She submitted that the GDC's position is that you have not met the requirements of Section 36C(4) of the Act and therefore you would not be suitable for registration as a Clinical Dental Technician at this time.

28. You gave oral evidence at this hearing and answered questions from the Professional Adviser.

29. In closing submissions, you explained the procedural difficulties you faced with your application. You submitted that your qualification as a Dental Technician is also relevant to your application to be registered as a Clinical Dental Technician. However, your application was refused by the GDC and you believe that you were not given a proper opportunity to rectify and clarify your position.

The Committee's Powers

30. A decision by the Registrar not to register a person's name in the dental care professionals' register is an appealable registration decision under Section 36J and

Schedule 4A of the Act. Paragraph 4(8) of Schedule 4A to the Act provides that the Committee may determine to:

a. dismiss the Appeal;
b. allow the appeal and quash the decision appealed against;
c. substitute for the decision appealed against any other decision which could have been made by the Registrar; or
d. remit the case to the Registrar to dispose of in accordance with the directions of the Registration Appeals Committee.

The Committee's Decision

31. The Committee has carefully considered your appeal. It has taken account of all the documentary evidence and of the submissions made by Miss Curzon and your oral evidence and oral submissions. It accepted the advice of the Professional Adviser and the Legal Adviser.

32. When making its decision, the Committee noted that the burden was on you to satisfy it that you had the requisite knowledge and skill for registration as a CDT. The Committee also bore in mind the overarching objectives of the GDC, which included protecting the public and maintaining public confidence in the profession.

33. The Committee first considered your undergraduate qualification and training. It considered the syllabus for your Bachelor of Science degree in Dental Technology, but noted that this was more relevant to the role of a DT rather than a CDT.

34. The Committee then went on to consider your professional training and experience since qualifying. It noted that your overseas clinical experience as a CDT was limited and undertaken some time ago. The Committee also noted that you have not undertaken any clinical examinations of patients and have only manufactured sport mouthguards but not fitted them. In particular, the Committee noted that you had limited experience of fitting dentures and appliances. The Committee further noted that you did not have experience in taking radiographs and appeared not to understand or be aware of the Ionising Radiation (Medical Exposure) Regulations (IRMER). You also were not able to explain clearly your understanding of patient consent and common oral lesions.

35. In respect of your Continuing Professional Development (CPD), the Committee noted that the majority of the courses undertaken were not relevant to the role of a CDT.

36. In respect of your oral evidence, the Committee considered that you did not fully demonstrate sufficient knowledge of the scope of practice of a CDT, and appeared not to recognise the differences between the roles of a DT and CDT.

37. Taking everything into consideration and for the reasons outlined above, the Committee determined that you did not have the relevant qualifications or possess the requisite knowledge and skill to practise as a Clinical Dental Technician.

38. Therefore, the Committee has determined to dismiss your appeal.

39. That concludes this hearing.

40. You have a right to appeal this decision to the County Court.