

**Registrations Appeal Committee
Registrations Appeal Hearing****1 July 2025****Name:** Mehmood, Imran**Case number:** CAS-210194-N4G8P2

General Dental Council: Matthew Turner, Counsel
Instructed by IHLPS**Appellant:** Present
Unrepresented

Decision: Appeal dismissed

Committee members: Jane Everitt (Chair, lay member)
James Ashworth-Holland (Dentist member)
Jennifer Cawley (Dental Care Professional member)**Legal adviser:** Megan Ashworth**Committee Secretary:** Sara Page

Mr Mehmood,

1. This Registrations Appeal Committee (RAC) has convened in accordance with the '*General Dental Council (Registration Appeals) Rules 2006*' ('the Appeal Rules'), pursuant to Schedule 4A of the '*Dentists Act 1984*' (as amended) ('the Act'). The purpose of the hearing is to consider your appeal against the decision taken by the GDC's Registrar not to admit you to the register as a dental hygienist and dental therapist.
2. The members of the Committee, as well as the Legal Adviser and the Committee Secretary, conducted the hearing remotely via Microsoft Teams in line with current General Dental Council (GDC) practice.
3. You were present at the hearing and unrepresented.
4. Mr Matthew Turner, Counsel, appeared as case presenter on behalf of the GDC.

Background

5. Mr Turner informed the Committee that you are not currently eligible for entry on to the Dental Register on the ground that you have not demonstrated the necessary knowledge of the English language. In this regard, he referred to Section 53(1) of the Act, as follows:

(b) ...knowledge of English which, in the interests of the person and the person's patients, is necessary for the practice of a profession complementary to dentistry in the United Kingdom.
6. Mr Turner also referred the Committee to the GDC guidance, '*Evidence of English language competence: Guidance for applicants*' (July 2017). The Guidance states that there are four types of evidence the GDC is likely to accept from an applicant, to demonstrate their knowledge of English:

Type 1: An International English Language Testing System (IELTS) certificate at the appropriate level.

Type 2: A recent primary dental qualification that has been taught and examined in English.

Type 3: A recent pass in a language test for registration with a regulatory authority in a country where the first language is English.

Type 4: Recent experience of practising in a country where the first language is English.
7. Paragraph 23 of the Guidance defines '*recent*' as meaning evidence relating to English language competence that is less than two years old at the point of the application being submitted to the GDC. The Guidance is not limited to these four types of evidence and other evidence will be accepted if it meets the criteria of paragraph 25 of the Guidance. The Guidance states in paragraph 25 that the following criteria will be applied by the GDC in determining whether any evidence provided is sufficient to prove the necessary knowledge of English. Any evidence:
 - *Must clearly demonstrate that the applicant has a good command of the English language that should suffice to fulfil the requirements of the Dentists Act in relation to English language competency;*
 - *Must be recent, objective, independent and robust;*

- *Must be readily verifiable by the GDC.*

Case summary

8. On 7 March 2023, your applications for registration as a dental hygienist and dental therapist along with supporting documentary evidence were received by the GDC.
9. On 13 August 2024, the GDC emailed you informing you that there appeared to be some additional information required before your application could be processed. As such, the GDC requested that you provide copies or different formats of various documents including your syllabus, professional references, Certificate of Good Standing (CGS), Continuing Professional Development (CPD) and self-reflections. In relation to your English language evidence, you were informed that your International English Language Testing System (IELTS) certificates could not be accepted due to the period of time that had passed since completing the exam. Further, the Implantology course completed could not be considered due to similar reasoning. You were advised that evidence of your English competence must be dated within the last two years. You were provided with information regarding retaking the IELTS test.
10. On 23 August 2024, the GDC received an email from you, informing the GDC that you had booked the IELTS test and provided a copy of the IELTS details. You also confirmed that you had applied for a new CGS.
11. On 4 September 2024, the GDC emailed you confirming that it had received your additional documentation, however it required further information regarding:
 - a) English language – Requesting the IELTS certificate following the IELTS test booked for 28 August 2024; and
 - b) Professional references – Requesting that references be sent directly via email by the referees for verification purposes.
12. On 8 September 2024, the GDC received an email from you, explaining that you had notified your referees to email the GDC and providing the IELTS academic results.
13. On 10 September 2024, the GDC emailed you confirming that it had reviewed your IELTS certificate and on this occasion the scores had not met the requirements. The GDC explained that it required a minimum 6.5 score in each category with an overall score of 7.0. The GDC advised that if you wished to retake the IELTS test or provide alternative evidence of English language, it could review your deadline accordingly. Furthermore, the GDC confirmed that it had yet to receive the references directly from your referees.
14. On 10 September 2024, the GDC received an email from you, requesting advice on whether you needed to retake the IELTS test, explaining that all your studies had been completed in English since childhood, and that you had recently completed almost 300 online short courses in English (that you had provided self-reflections for). You suggested that if the IELTS score decided your case, then you would have no other option than to re-sit the examination. You also explained that the GDC should receive the references via email within the next ten days.
15. On 10 September 2024, the GDC replied by return email explaining that the IELTS is one option and that it would recommend reviewing the GDC's Guidance for further information. The GDC sent a further reminder that the evidence provided must be dated within the last two years.
16. On 17 September 2024, the GDC received an email from you confirming that you had booked the IELTS test for 10 October 2024 and asking whether this was satisfactory or whether you could

have additional time to take the test. The GDC acknowledged receipt and requested that you provide the results by 24 October 2024.

17. On 22 October 2024, the GDC received an email from you attaching your IELTS test scores. You requested that if further documents were required, that the GDC let you know and you would provide them as soon as possible.
18. On 28 October 2024, the GDC emailed you confirming that it had reviewed your IELTS certificate and the scores had not met the requirements. The GDC explained again that it required a minimum 6.5 score in each category with an overall score of 7.0. The GDC advised that if you wished to retake the IELTS test or provide another form of evidence to satisfy the English language requirements, this must be provided by 13 November 2024. The GDC explained that if it did not receive the evidence required to progress your application further, your application and supporting documents would be returned to you and you would not be eligible to apply under this route.
19. On 31 October 2024, the GDC received an email from you requesting confirmation on whether the Pearson Test of English (PTE) or the Duolingo English Test could fulfil the English language requirement. Further, you queried whether enrolling onto an accredited language course in the United Kingdom could serve as an alternative to IELTS to meet the language requirement.
20. On 4 November 2024, the GDC emailed you confirming that it currently only accepts the IELTS examination (academic version) completed within the last two years. The GDC informed you that you must submit your evidence of English Language by 13 November 2024, or the GDC would not be able to proceed with his application further.
21. On 13 November 2024, the GDC received an email from you submitting your recent IELTS report, which you stated demonstrated *'improved results compared to the three previous reports'*. You further explained that you had dedicated yourself to enhancing your skills in dentistry by completing 300 online paid courses offered by the NHS, and that these courses had improved your clinical knowledge and contributed to your language proficiency. You explained that your *'...reflective practice has been invaluable in deepening [your] understanding of the material and preparing [you] to communicate effectively in a professional environment.'* You considered that your recent IELTS scores, combined with your extensive education and reflective practices within the last two years met the GDC language requirements. Furthermore, you explained that you were engaged in a three-month course in dentistry to be completed by the end of November.
22. On 21 November 2024, the GDC emailed you confirming that it had reviewed your IELTS certificate and on this occasion the scores had not met the requirements. The GDC repeated the IELTS score requirements, and that they could not accept a combined score using the previous certificates. The GDC explained that in this instance it would not be able to process your application further. The GDC further explained that, from 8 March 2023, an overseas diploma in dentistry cannot be used to support an application for registration as a DCP in the UK. You were given information about alternative ways of gaining registration as a dentist in the UK.
23. On 23 November 2024, the GDC received a further email from you expressing your disappointment with the GDC's position and indicated you felt disheartened after *'two years of dedicated effort, significant financial investment, and unwavering commitment to achieving success in this endeavor [sic].'* You explained that you understood that the decision-making process is thorough and competitive and requested reconsideration or guidance on how you are to continue with your application and asked for feedback on how you might address any shortcomings in your application. You addressed the failure to obtain the additional scoring of 0.5

within your IELTS score and asks if this could be *'waved or given relaxation or favor as i have submitted much more required for the full application'* [sic].

24. On 29 November 2024, the GDC emailed you attaching a decision outcome letter and notice of appeal application. The GDC maintained its position with respect to the outcome of your application, stating that you had not met the English language requirements. The reasons for the decision were that within your application received on 7 March 2023, you enclosed two IELTS certificates dated 2009 and 2015, both of which could not be accepted as English Language Evidence needed to be dated within two years from when your application was received to be taken into consideration. Furthermore, the GDC explained that your IELTS test results, dated 28 August 2024 and 19 October 2024, did not meet the required scores. The letter informed you of your right to appeal and that if you wished to appeal, you must do so by 2 January 2025.
25. On 1 January 2025, the GDC received a Notice of Appeal (NOA) from you by way of email setting out the reasons that you were appealing the GDC's decision and providing supporting documents.
26. On 7 February 2025, the GDC emailed you confirming that your NOA had been received, requesting further information regarding whether you had retaken the IELTS examination and achieved the required score and whether you obtained any other further evidence of proficiency in the English language to satisfy the requirements within the last two years.
27. On 9 February 2025, the GDC received an email from you providing further information and supporting documentation.
28. On 6 March 2025, you wrote to the GDC to request a reassessment as a hearing co-ordinator had told you to ask for a reassessment. On 10 March 2025, the GDC responded to confirm that as your applications were not assessed by a panel, you could not have a reassessment. The GDC clarified that if you had since re-taken the IELTS, or were able to provide further evidence of proficiency in the English language, this could be taken into consideration.
29. On 11 March 2025, you confirmed that your complete application and all supporting documents had been returned to the GDC, highlighting that you included some recent certificates as an alternative source of English language proficiency. You submitted that the evidence you had provided served as *'strong evidence of [your] English language proficiency. These credentials are robust and easily verifiable and demonstrate my proficiency effectively.'*
30. On 24 June 2025, you sent an email to the GDC providing what you described as supplementary evidence specifically addressing the English language requirements set by the GDC.

Submissions

31. Mr Turner, on behalf of the GDC, confirmed the position of the GDC as outlined in the GDC's written submissions. The GDC's position is that you have not demonstrated the necessary knowledge of English. As this is your appeal, the burden is on you to satisfy the Committee that you have the necessary knowledge of English required for registration as a dental therapist/dental hygienist under section 36C(6(aa)) of the Act (Matter D).
32. The Registrar considered your IELTS scores and additional documentation in line with the Guidance. In particular, the Registrar had concerns that you failed to meet the GDC's minimum IELTS score requirements on four occasions (including as recently as October 2024). It is respectfully submitted that the IELTS exam can be considered as a fair and objective assessment of English language proficiency. Further, while the Registrar can consider the additional evidence provided by you as set out under the Guidance, it cannot disregard the failed IELTS exam results.

You correctly submitted that the Guidance makes no reference to any weight being attached to the different types of English language evidence that will be accepted by the GDC. The GDC submitted that as you have demonstrated clear and recent evidence that you consistently did not meet the GDC's standards in the IELTS test, the Registrar was not satisfied that you have the necessary knowledge of English.

33. Mr Turner adopted the GDC's written submissions and reminded the Committee that it should consider any additional information provided by you for the purposes of this appeal and it may assess this information to determine whether you have demonstrated the necessary knowledge of English.
34. You submitted that you have spent a number of years committed to meeting the requirements for registration and have spent time and money undertaking the examinations to comply with the GDC's English language requirements in order to apply for admission on to the Dental Register as a dental hygienist/dental therapist. You confirmed that you have taken the IELTS examination a number of times and you have noticed a fluctuation in the modules, including technical issues.
35. You stated that you have provided a lot of information, aside from the results from the IELTS examination, that demonstrates your knowledge of the English language. This included attendance at training courses conducted entirely in English. You confirmed that your entire Bachelor of Dental Surgery (BDS) course was delivered entirely in English. In addition, you confirmed that your current place of work as a dental surgeon at a clinic in Pakistan, despite a number of patients speaking local languages is entirely English-speaking, including verbal patient communications, written and verbal feedback, and all paperwork. You also informed the Committee that you are currently undertaking some research and commencing a Master's degree in oral pathology.

Committee's decision on appeal

36. In coming to its decision, the Committee considered all the evidence before it today. It took account of the submissions made by both parties and accepted the advice of the Legal Adviser.
37. The Committee noted the following additional documents that were before it today, namely:
 - Certificate of completion of '*Immediate implant placement in aesthetic zone*', dated 18 February 2025 (4 hours);
 - Certificate of completion of '*Basics of legal writing techniques*', dated 21 June 2025;
 - Certificate of completion of '*Fundamentals of English grammar*', dated 3 May 2025;
 - Letter from the Principal Dentist and owner, Dr 1, of the dental clinic where you currently work in Pakistan, undated but provided to the GDC on 30 June 2025.
38. In order to assess the information, provided to it today, the Committee carefully considered the Guidance, namely that '*Communication is speaking, reading, writing and listening*', and bore this in mind when coming to its decision on your appeal. The Committee also had regard to paragraph 25 and the requirements for evidence, namely:
 - *must clearly demonstrate that you have a good command of the English language that should suffice to fulfil the requirements of the Dentists Act in relation to English language competency;*
 - *must be recent, objective, independent and robust;*

- *must be readily verifiable by the GDC.*

39. The Committee was aware that the latest certificates that you had provided, as detailed above, demonstrated completion of online courses that the Committee did not consider required the same level of assessment or scrutiny as that of the IELTS examinations. It noted that to have completed the courses, a basic understanding of the English language is required. In addition, the Committee had regard to the evidence of completion of around 300 online courses of Continuing Professional Development (CPD) and whilst it acknowledged that the written reflections appeared to be thoughtful, they are not measured or assessed in the same way as the comprehensive analysis of the completion of the IELTSs, or similar, examinations. The Committee considered that the responses to the online CPD questions would only be able to measure reading and writing, without any assessment of speaking or listening. Further, the Committee noted that a number of the certificates were evidence of attendance on the course.
40. Having considered the letter from Dr 1, the Committee took into account the positive remarks made regarding your professionalism and knowledge of English. However, the Committee noted that this evidence was not independent as required by the Guidance due to Dr 1's assertion that he has worked with you since 2011.
41. The Committee bore in mind that your BDS was conducted in English but noted that this was undertaken between 2003 – 2007, which was not considered recent in accordance with the Guidance of being no more than two years old.
42. The Committee also bore in mind the four attempts you have made to 'pass' the IELTS examinations to the degree accepted by the GDC, namely an overall score of Band 7. The committee considered the differences detailed in the pass marks, as below:

Band 6 – Competent user

Has generally effective command of the language despite some inaccuracies, inappropriacies and misunderstandings. Can use and understand fairly complex language, particularly in familiar situations.

Band 7 – Good user

Has operational command of the language, though with occasional inaccuracies, inappropriacies and misunderstandings in some situations. Generally handles complex language well and understands detailed reasoning.

43. You told the Committee that you have been practising as a dentist in Pakistan in an English-speaking practice for some ten years and that you communicate with approximately 70% of your patients entirely in English. The Committee found it surprising that, despite this assertion, you still have not yet demonstrated an overall score of Band 7 in the IELTS examination. It acknowledged the issues that you raised regarding what you considered to be inconsistencies and technical difficulties in the delivery of the examination. However, this is an objective international test, and the Committee could not go behind the results without further evidence. The Committee noted that you have attempted the IELTS examination four times, most recently in October 2024, and have shown some improvement in your scores, which was evidence of your dedication and commitment to meeting the GDC's requirements for admission on to the Register.
44. On the basis that you have been practising in the English language for some ten years, and having considered the additional information that has been provided, the Committee was not convinced that you have been able to demonstrate that you have a good command of the English language that should suffice to fulfil the requirements of the Dentists Act in relation to English

language competency. Therefore, having evaluated the quality of the evidence provided and the additional information supplied for today's appeal, the Committee could not be satisfied that you would be capable of safe and effective practice as you have not demonstrated the necessary knowledge of the English language.

45. In all the circumstances, the Committee determined to dismiss your appeal for registration in the Dentists Register.
46. This will be confirmed to you in writing in accordance with the Act.
47. That concludes this determination.