

**PUBLIC HEARING**  
**Registration Appeals Committee**

26 May 2026

**Name:** VILCEA, Oana-Maria

**Case Number:** CAS- 215545-M6V7W9

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**General Dental Council:** Peta-Louise Bagott of Counsel  
Instructed by Noranne Griffith of IHLAS

**Registrant:** Present  
Unrepresented

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**Outcome:** Appeal allowed; registration granted under the title of Dental Hygienist

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**Committee members:** David Wood (Chair) (Lay)  
Angela Wragg (Dental Care Professional)  
Duncan Smith (Dentist member)

**Professional Adviser:** Malcolm Smith

**Legal Adviser:** Nicola Gordelier

**Committee Secretary:** Paul Carson

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Mrs Vilcea,

1. This is an appeal against the registrar's decision not to grant you registration on the DCP register under the title of Dental Hygienist. The issue on appeal is whether you demonstrate the requisite knowledge and skill to practise as a member of the profession under this title in accordance with the requirements of sections 36C(4)(b) or (4A)(b) of the Dentists Act 1984 (the 'Act').

*Background*

2. You have worked in the United Kingdom as a Dental Nurse since 2015: full time until September 2020 and part-time thereafter. In September 2022 you were awarded the following "International Master's" qualification from the University of Bari Aldo Moro in Bari, Italy in "*The role dental therapy and competences of the dental hygienist in the medical and dental office*" (as translated). You practised as a Dental Hygienist in Romania for a total of 12 months in 2025/26, seeing around 6 patients per day.
3. On 12 December 2022, you submitted an application to the General Dental Council (GDC) for registration under the title of Dental Hygienist, relying on your Master's qualification and the provisions of section 36C of the Act (as in force at the time), which require you to satisfy the registrar of a number of matters, including, so far as is relevant to this appeal, a relevant qualification which falls within either 'Matter C' or the exempting provisions of section 36C(4A).

4. Section 36C(4) provides that:

*'Matter C is that the person—*

*(a) holds a qualification or qualifications 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.'*

5. Section 36(4A) provides that:

*'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).'*

6. Accordingly, the first consideration for the registrar was whether you hold a relevant qualification which meets the requirements of section 36(4A) of the Act in relation to the title of Dental Hygienist. If you do, then you would be eligible for registration under that title (subject to your also satisfying the registrar of other matters which are not in issue on appeal, such as your identity, character and health). If you do not hold a relevant

qualification which meets the requirements of section 36(4A) consideration must then be given to whether you alternatively meet the requirements of 'Matter C', as quoted above.

7. The registrar accepted that your Master's qualification is a 'relevant qualification' for the purposes of sections 36C(4)(a) and 36(4A)(a) of the Act. The registrar, however, did not accept that your qualification meets the requirements of section 36(4A)(b), on the basis that it does not demonstrate 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) of the Act.
8. The registrar therefore proceeded to consider your application under 'Matter C', namely whether you demonstrate that you have the requisite knowledge and skill to practise under the title of Dental Hygienist in accordance with section 36C(4)(b) of the Act. When determining whether an applicant has the requisite knowledge and skill, section 36C(5)(a) requires the Council to take into account all the applicant's relevant qualifications, and all relevant knowledge or experience, wherever acquired.
9. Your application was considered on paper by panels convened by the registrar to assess your qualification, training and experience against the Learning Outcomes which are required for Dental Hygienists. The panels met on 16 May 2024, 21 October 2024, 16 July 2025, 22 October 2025 and 7 January 2026 with the ultimate outcome of this assessment process being a decision that your application did not demonstrate that a number of the Learning Outcomes had been covered as part of your training or professional experience.
10. Accordingly, the GDC wrote to you on 9 February 2026 refusing your application for registration as a Dental Hygienist. The letter stated:

*'...Having taken into account your relevant qualifications and all your relevant knowledge and experience acquired, the GDC has decided that you are currently not eligible for registration as a Dental Hygienist as you have not satisfied the Registrar that you have the requisite knowledge and skill to practise as a member of that profession. The reasons for this decision are set out below.*

*Your application for registration to the General Dental Council (GDC) register was initially submitted to the GDC assessment panel in October 2025. Following the assessment, the panel were unable to recommend registration as further information was requested regarding your course; 'The Role Dental Therapy and Competences of the Dental Hygienist in the Medical and Dental Office' ('the course').*

*The additional evidence provided has now been reassessed by the GDC panel and the GDC has decided that your course does not satisfy equivalence to a UK training programme and would not be suitable to be accepted for registration with the GDC.*

*Following the decision letter dated 27 October 2025, you provided additional information, however this evidence does not meet the deficiencies outlined.*

*The reasons for refusal are set out below:*

- *You have not provided any new evidence to meet the deficiencies identified by the October 2025 panel.*
- *The clinical professional reference provided, does not address the deficiencies related to the course content and was not requested in the October 2025 panel.*
- *The self-reflections, appear to have been previously submitted and assessed, and do not address the deficiencies related to the course content.*

*The deficiencies outlined in the decision letter dated 27 October 2025 have not been evidenced. To meet the learning outcomes, you would need to provide new evidence to suitably address all of the concerns listed in the previous decision letter dated October 2025 which are listed below again...'*

11. On 1 March 2026 you lodged your appeal against this decision.

The appeal hearing 26 May 2026

12. The Committee met today over Microsoft Teams to consider your appeal. The Committee had regard to the oral evidence which you gave and to the documents provided in support of your appeal, including documentation and evidence which was not available to the registrar's assessment panels.
13. In your oral evidence, you described your clinical training and subsequent experience as a Dental Hygienist in Romania, including supervised patient care and post-qualification clinical work. You said that your experience included preventative care, oral health instruction, periodontal treatment, scale and polish, ultrasonic and hand scaling, radiographs, local anaesthetic, impressions and patient consent.
14. You answered questions about your understanding of UK dental hygiene practice, including Direct Access, Patient Group Directions, minimally invasive dentistry, oral cancer awareness, periodontal assessment, Scope of Practice, referral, and prevention, patient safety and patient care.
15. You also discussed in your oral evidence your experience of treating patients clinically and of practising on phantom heads.
16. Miss Bagott submitted that, under Matter C, the Committee must consider whether you have the requisite knowledge and skills to practise as a Dental Hygienist. She submitted that the Committee may take into account your qualifications, knowledge and experience, including the material previously before the registrar and any new information provided on appeal, including any oral evidence and the advice of the Professional Adviser.
17. You submitted that, despite your applications having previously been refused, the university had provided answers to the questions raised by the registrar's assessment panels. You said that you are entitled to work as a Dental Hygienist in the EU states of Romania and Italy, but that, as you live in the UK, you wish to practise here.
18. You submitted that you have the knowledge and skills required to practise as a Dental Hygienist in the UK. You stated that you are passionate about oral health, patient care, and educating patients, and that you want to make a difference in patients' lives.

*Decision*

19. The Committee accepted the advice of the Professional Adviser, including his opinion that your Master's qualification appeared to comprise dental hygiene elements and clinical work on patients at a level and scope comparable to that of a Dental Hygienist training in the UK.
20. The Committee accepted the advice of the Legal Adviser.
21. The Committee noted that your applications were assessed by the registrar's panels without the benefit of the further evidence and information which is now available on appeal. The Committee also noted your career path as a Dental Care Professional. You have worked as a Dental Nurse in the United Kingdom since 2015 and studied in the EU to qualify as a Dental Hygienist.
22. The Committee first considered whether your overseas qualification demonstrated a comparable level of knowledge and skill to an approved UK qualification for Dental Hygienists. It noted that your qualification allows you to practise as a Dental Hygienist in Italy and Romania, which are EU member states for which there would be a high level of regulation in terms of dental education and clinical practice. The documentation available to the Committee appears to indicate that your course covered material broadly comparable to that expected of a UK dental hygienist qualification.
23. However, the Committee had concerns about the clarity and reliability of the documentation from the training provider relating to the course syllabus. In particular, the course documentation referred to competencies including tooth extraction, whereas you confirmed in oral evidence that you had not carried out extractions and had not been trained to do so. The Committee considered whether this could be explained by the course including dental therapy elements, or by the distinction between theoretical taught elements and practical clinical experience. However, the Committee remained concerned that the documentation did not clearly identify what you had been taught and assessed in.
24. There was a lack of clarity in the material provided by the training provider. The Committee considered that you answered questions about this issue, and all other aspects of your training and clinical experience, candidly and directly. However, the inconsistency reduced the weight the Committee could place on the qualification documentation when assessing whether the qualification itself demonstrated a comparable level of knowledge and skill to an approved UK Dental Hygienist qualification. The Committee was therefore not completely satisfied on the evidence that you had met the burden of proof that your qualification falls within the exempting provisions of section 36C(4A) of the Act.
25. The Committee therefore went on to consider whether, taking the evidence as a whole, you had demonstrated the requisite knowledge and skills to practise as a Dental Hygienist for the purposes of section 36C(4)(b) of the Act. In doing so, it took into account your qualification, the syllabus and logbook evidence, your clinical experience in Romania, your work as a registered Dental Nurse in the UK since 2015, your CPD and self-reflections, the recent references provided in support of your appeal, the Professional Adviser's advice, and the oral evidence you gave at the hearing.

26. The Committee noted that you had undertaken clinical practice as a Dental Hygienist in Romania for two periods amounting to approximately 12 months in total. In relative terms, this was not extensive experience and had not been continuous since qualification in 2022. However, the Committee considered this in the context of the practical circumstances following your qualification. It noted that you had applied for UK registration shortly after qualifying, with the intention of beginning your career as a Dental Hygienist in the UK and accumulating further clinical experience here. The Committee recognised that the registration process had continued for a significant period, during which you were not able to practise as a Dental Hygienist in the UK.
27. The Committee considered that, in those circumstances, you had taken reasonable and sustained steps to maintain and develop your knowledge and skills as far as you were able. You had returned to Romania for two periods of clinical practice, each of approximately six months, in order to keep your practical skills current. The Committee also took into account your CPD, your self-reflections, your work in a UK dental setting as a registered Dental Nurse, your access to mentoring, professional support and phantom head practice. The Committee considered that this demonstrated an ongoing commitment to maintaining your skills and preparing for practice as a Dental Hygienist in the UK, despite the registration process taking an extended period due to a number of panels having to be convened to consider further evidence.
28. The Committee also considered that you have worked for a substantial period as a registered Dental Nurse in the UK. While it recognised that dental nursing is a different role from dental hygiene, it considered that this experience was relevant to your understanding of UK dental practice, patient care, prevention, patient safety, consent, communication, Scope of Practice, and the functioning of the dental team.
29. The Committee also considered your oral evidence. It noted that you answered a range of questions about dental hygiene practice, including periodontal assessment, BPE and six-point pocket charting, scaling, polishing, radiographs, local anaesthetic, impressions, peri-implant conditions, anxious patients, oral cancer awareness, Direct Access, patient group directions, minimally invasive dentistry, systemic links with oral health, Scope of Practice and referral. The Committee considered that your answers were candid, direct and reflected a good degree of knowledge and understanding.
30. Taking these matters together, the Committee was satisfied that you demonstrate the requisite knowledge and skill to practise as a Dental Hygienist and that you therefore satisfy 'Matter C' in respect of that title.
31. Miss Bagott had confirmed to the Committee that 'Matter D', which relates to your identity, character, knowledge of English and health, has already been met by the fact of your current GDC registration under the title of Dental Nurse.
32. Accordingly, there are no remaining matters for assessment in respect of your application. The Committee therefore quashes the decision of the registrar and substitutes a decision that your name be registered in the DCP under the additional title of Dental Hygienist.
33. That concludes this determination.