

HEARING HELD IN PUBLIC

Registration Appeals Committee (Registration Appeal Hearing)

29 May 2026

Name: ABDALLA, Areeg

Case number: CAS-212460-F2L7S2

General Dental Council: James Halliday, Counsel
Instructed by Megan Wolliner, ILAS

Appellant: Present
Unrepresented

Outcome: Appeal allowed in respect of Matter C
Remitted back to the Registrar in respect of Matter D

Committee members: Zareen Elleby (Chair, Dental Care Professional Member)
Caroline Healy (Lay Member)
Melissa Oura (Dentist Member)

Professional Adviser: Malcolm Smith

Legal Adviser: Angus Macpherson

Committee Secretary: Lola Bird

Mrs Abdalla,

1. This is a Registration Appeals Committee hearing. The hearing is being conducted remotely by Microsoft Teams video-link.
2. The hearing is being held in accordance with the terms of the *General Dental Council (Registration Appeals) Rules Order of Council 2006*, pursuant to Schedule 4A of the *Dentists Act 1984 (as amended)* ('the Dentists Act').
3. The purpose of this hearing has been for the Committee to consider your appeal against the decision of the GDC's Registrar that you are not eligible for registration on the Dental Care Professionals Register ('the DCP Register') as a Dental Therapist.
4. You are representing yourself at these proceedings. Mr James Halliday, Counsel, appears on behalf of the Registrar.

Legal framework and background

5. The Committee had regard to the legal framework and factual background to this appeal, as set out in the written case summary provided by the GDC dated 16 March 2026, and as outlined by Mr Halliday in his opening submissions.
6. You originally applied to be registered with the GDC as a Dental Hygienist. That original application was received by the GDC on 7 March 2023. In making your application you relied on your Bachelor of Dental Surgery (BDS) obtained from the Dow University of Science and Technology in Sudan in 2010.
7. It is noted in the GDC's case summary that there was a change in law on 8 March 2023, in relation to how applicants with overseas diplomas in dentistry can join the DCP Register. Prior to 8 March 2023, an applicant who held an overseas diploma in dentistry was able to apply to join the DCP Register. However, applicants can no longer rely on diplomas in dentistry and must now hold a relevant DCP qualification to join the DCP Register. As your original application to be registered as a Dental Hygienist was received by the GDC on 7 March 2023, which was a day before the change in legislation, it was processed in accordance with the legislative framework in place at that time.
8. Upon your request, your original application to be registered as a Dental Hygienist was changed to an application to be registered as a Dental Therapist on 27 January 2025. The GDC continued to process your updated application as a continuation of your original application under the pre-8 March 2023 legislation. Therefore, in setting out the law in relation to this appeal, the GDC has referred to the relevant parts of the Dentists Act that were in force at the time your original application was received.

9. Accordingly, it is noted that your application for registration was made under Section 36C of the Dentists Act, as it was at the time. Sections 36C(1), (2) and (4) to (6) of the Act stated as follows:

- (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.*
- (4) *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.*
- (4A) ...
- (5) *For the purpose of establishing whether a person has the requisite knowledge and skill for the purposes of subsection (4)(b), the Council—*
 - (a) *shall take into account all that person's relevant qualifications, and all relevant knowledge or experience, wherever acquired, and*
 - (b) *may determine that a person must perform to the satisfaction of the Council in any test or assessment specified in the determination.*
- (6) *Matter D is—*
 - (a) *the person's identity;*
 - (aa) *that [they have] the necessary knowledge of English;*
 - (b) *that [they are] of good character; and*
 - (c) *that [they are] in good health, both physically and mentally.*

10. You made your application for registration as a Dental Therapist under Matters C and D above. However, the only matter under consideration at this appeal is whether you have the requisite knowledge and skill to be registered as a Dental Therapist in accordance with

Matter C. In outlining the case background, Mr Halliday stated that should the Committee be minded to allow your appeal today, it should remit the matter back to the Register in relation to the Matter D requirements.

Requisite knowledge and skill

11. Under the applicable legal framework at the time, when determining whether an applicant has the requisite knowledge and skill, the GDC is required under section 36C(5)(a) of the Dentists Act to take into account all your relevant qualifications, and all relevant knowledge or experience, wherever acquired.

The first assessment panel outcome

12. On 8 April 2025, a Registration Assessment Panel ('the first assessment panel') considered your application along with your supporting documentation. Due to an administrative error, the following documents provided by you to the GDC on 1 February 2025 were not included in the material considered by the first assessment panel:

- Complaints Handling certificate dated 1 March 2023.
- Clinical Governance in Healthcare certificate dated 20 January 2025.
- Breaking Bad News in Dentistry certificate dated 20 January 2025.
- Immediate Life Support (ILS) certificate dated 24 January 2025.

13. These outstanding documents were included in the reassessment bundle of information that was considered by the reassessment panel ('the second assessment panel'), the outcome of which is dealt with later in this determination.

14. In terms of the decision of the first assessment panel, the outcome of its assessment was that the evidence you provided did not demonstrate that you have the requisite knowledge and skill to be eligible for registration as a Dental Therapist. Accordingly, that panel did not recommend your entry onto the DCP Register.

15. The Registrar relied on the decision of the first assessment panel, and on 22 April 2025, the GDC sent you a letter informing you of the outcome of the assessment of your application. The GDC informed you that the first assessment panel had identified that a number of learning outcomes, relevant to the practice of a Dental Therapist, were not covered as part of your training or professional experience.

16. The relevant learning outcomes were set out in detail in the decision letter of 22 April 2025, along with suggestions for evidence that might demonstrate the learning outcomes. These suggestions included requests for a recent professional reference confirming clinical competency in respect of the learning outcomes, as well as some requests for evidence of relevant Continuing Professional Development (CPD).

17. You were advised by the GDC that, should you have any new or additional information which would address the deficiencies identified by the first assessment panel, you could submit the additional information to the GDC by 22 May 2025 for consideration by the Registrar. You were further advised of your right to appeal the refusal of your application for registration.

The second assessment panel outcome

18. You did provide additional information to the GDC, including a Professional Work Reference dated 15 May 2025, various Continuing Professional Development (CPD) certificates and self-reflections. On 9 July 2025, your updated application was re-assessed by a Registration Assessment Panel ('the second assessment panel'). This second assessment included consideration of the documents that were omitted in error from the first assessment.

19. Despite the additional evidence, the second assessment panel remained of the view that you had not demonstrated that you have the requisite knowledge and skill for registration as a Dental Therapist. Accordingly, the second assessment panel did not recommend entry onto the DCP Register.

20. The Registrar relied on the decision of the second assessment panel in respect of your application and the GDC sent you a decision letter dated 22 July 2025. That letter confirmed the decision that you were not eligible for registration as a Dental Therapist because you had not satisfied the Registrar that you had the requisite knowledge and skill to practise under that title. The outstanding learning outcomes that you had not demonstrated were outlined in the decision letter. You were again advised of your right to appeal the Registrar's decision.

Your appeal

21. On 20 August 2025, the GDC received your Notice of Appeal (NOA) appealing the decision of the Registrar not to register you as a Dental Therapist. In support of your appeal, you provided the following documentation:

- Professional Work Reference dated 18 August 2025
- Professional Work Reference dated 15 May 2025
- Clinical Competency Letter
- Various self-declarations and self-reflections

22. In summary, you stated in your NOA that you were appealing the refusal decision of 22 July 2025, as you believed your application demonstrated full alignment with the GDC's professional and clinical competencies and that you remained fully committed to upholding

the highest standards of patient care, ethical practice and professional conduct. You went on to outline your grounds of appeal in more detail.

Today's appeal hearing

23. The Committee heard submissions from Mr Halliday made on behalf of the Registrar, as well as submissions from you. You also gave oral evidence to the Committee under Affirmation, during which you answered questions put to you by the independent Professional Adviser present at these proceedings, the Committee and Mr Halliday.

24. Further, the Committee had before it all the material that was before the second assessment panel, as well as your NOA and the documentation that you provided in support of this appeal. The Committee noted that these supporting documents included additional material that was not considered previously, such as the Professional Work Reference in relation to your practice as a Dentist in Sudan, dated 18 August 2025 and a number of self-reflections.

Initial submissions made on behalf of the Registrar

25. Prior to you giving oral evidence, Mr Halliday made initial submissions confirming the position of the Registrar, as set out in the GDC's case summary of 16 March 2026. He submitted that the Registrar relied on the decision of the second assessment panel made on 9 July 2025. Mr Halliday submitted that although you had provided a large number of documents for this appeal, including evidence of CPD and your self-reflections, when looking at the requirements of Matter C, namely that you must have the requisite knowledge and skill for registration as a Dental Therapist, you had not satisfactorily discharged your burden.

26. In making his submissions, Mr Halliday drew the Committee's attention to concerns about the timeline of your career, in that there appeared from your CV to be a substantial gap between the completion of your undergraduate degree and your next role working in full time practice as a dentist. He also identified a further gap between you having worked in Sudan and the start of your work in the UK as a trainee Dental Nurse.

27. Mr Halliday also raised a concern about the Professional Work Reference you had provided to the second assessment panel in relation to your practice in Sudan dated 15 May 2025. He submitted that the panel had been correct to conclude that this was not a recent reference, as it was dated some three years after your relevant employment in Sudan, which on your CV was from 2017 to 2022, working in a hospital. Mr Halliday made the same observation in respect of the Professional Work Reference dated 15 August 2025, which was provided with your NOA and from the same referee.

28. It was Mr Halliday's submission that on the documentary evidence before the Committee, it could not be satisfied that you had the requisite knowledge and skill to be registered as a Dental Therapist. However, he stated that he would reserve any closing submissions until after any further evidence had been presented.

Your oral evidence

29. The Committee next heard your oral evidence. You first addressed the issue raised by Mr Halliday regarding your Professional Work Reference of 18 August 2025. You told the Committee that this was an up-to-date reference, as it encompassed the clinical practice you had undertaken as a Dentist when you returned to Sudan most recently, which you said was from May to July 2025, in a hospital setting, when you saw around 15 patients per day. You said you had returned at that time to assist in Sudan, a country afflicted by war, and to refresh and maintain your knowledge, skills and experience as a Dentist. You also told the Committee that there had been a period between April 2014 to April 2016, when you had worked as a Dentist at a private clinic in Sudan providing a variety of dental services, including paediatric dentistry. You drew the Committee's attention to a 'Certificate of Experience' contained within the material provided which confirmed your work at the private clinic. You also spoke about a master's degree that you had completed in Sudan in March 2020, during which you had gained experience providing oral education to school children, including children with special needs. A copy of that certificate was also in the material before the Committee.

30. In answer to questions put to you by the Professional Adviser regarding your undergraduate training and syllabus, which was for qualification as a Dentist and not a Dental Therapist, you stated that your curriculum had covered everything that is included in the scope of practice as a Dental Therapist. You answered further questions on how your undergraduate training was assessed. You stated that it was in your third year that you began clinical practice under supervision, and that in your fourth and fifth years, you had to ensure that you gained experience in every clinical department, and completed all relevant areas of practice in each, before you were permitted to sit the examinations. You also spoke about the internship you had completed from 2011 to 2012, and all that this had entailed. You described the internship as being similar to a foundation year of training in the UK.

31. You stated that you had worked continuously as a Dentist in Sudan from your qualification in 2010 until 2022, when you came to the UK. In relation to your most recent period of clinical practice, when you returned to Sudan for 12-weeks in 2025, you told the Committee that you had been observed by the Director of the department you were working in, although not continuously. You said that he would check in with you in the mornings and at the end of the day, which involved looking at your patient lists and discussing patient cases. However, you stated that in addition he did observe your clinical work on occasion. You emphasised that you are a qualified Dentist in Sudan and the Director was content for you to practise independently when he was confident that you were able to do so.

32. You answered a number of further questions from the Professional Adviser including in relation to your knowledge and experience in relation to non-surgical procedures, complications following periodontal treatment, the filling materials you have used, the use of pre-formed metal crowns, treating exposed pulp, the administration of local anaesthesia and minimally invasive dentistry. You were also asked about your knowledge of other relevant areas, such as your understanding of Direct Access, Patient Group Directions and the scope of practice of a Dental Therapist. You also spoke about the CPD you had undertaken, how you reflected on your learning and what CPD you planned to undertake in future. You confirmed to the Committee that in addition to the ILS certificate provided dated 24 January 2025, you had undertaken Basic Life Support training in around February 2026 at your current practice.

33. In answer to Committee questions, you outlined that you have had the opportunity, whilst working as a trainee Dental Nurse in the UK to work with and observe a Dental Therapist colleague, as well as Dentists. You said that you work with the Dental Therapist colleague two times a week and have been doing so for at least six months. You also provided more detail in relation to your experience working as a Dentist in Sudan in relation to the types of patients you saw, the treatments you carried out and the instruments and equipment you used.

34. You also answered a number of questions put to you by the GDC. When asked by Mr Halliday why reference to your master's degree and the two periods of clinical practice you outlined were not on your CV, namely the 12-week period of clinical practice 2025 and your earlier work in the private clinic, both in Sudan. You said that as that CV was drafted in support of your application to be a Dental Nurse, you had been advised by friends and colleagues to focus on your most recent clinical experience, and you had therefore omitted these older periods of practice.

35. Following your oral evidence, the Committee heard closing submissions from both parties.

36. Mr Halliday reminded the Committee that the burden was on you to demonstrate that you have the requisite knowledge and skill to be registered with the GDC as a Dental Therapist. It was his submission that the oral evidence the Committee had heard from you did not address the concern that you have only undertaken 12 weeks of clinical practice in the last four years. He also raised a concern with what he described as the limited nature of your supervision during that period to ensure correct clinical outcomes. It was Mr Halliday's submission that the evidence provided to the Committee today was insufficient to discharge your burden.

37. You submitted that you have some 15 years' experience working as a Dentist in Sudan and that there was no need for you to have been supervised all the time whilst working there

in May to July 2025. You stated that it was a small department and your Director was able to check from time to time on what you were doing and if you required assistance. You said that you had done everything you could to ensure that you maintained your clinical skills and that returning to Sudan was not easy, given the situation there, and because of your family commitments here in the UK. You submitted that your experience from Sudan and the knowledge and experience you have gained here in the UK would be of assistance to you. You told the Committee that you were confident that you have the requisite knowledge and skill to provide safe and proper care to patients.

The Committee's decision on your appeal

38. The Committee considered all the evidence before it, including your oral evidence. It took account of the submissions made by Mr Halliday on behalf of the Registrar and your submissions.

39. The Committee accepted the advice of the independent Professional Adviser, including that your undergraduate qualification appeared to include elements relevant to Dental Therapy training in the UK. The Professional Adviser also noted your completion of a one-year internship, with supervision broadly applied in the same way as foundation training in the UK.

40. The Committee also accepted the advice of the Legal Adviser, who confirmed that the correct legal framework in respect of this appeal and the approach the Committee should take in relation to its decision-making.

41. The Committee bore in mind that the burden was on you to satisfy it that you have the requisite knowledge and skill required by section 36C(4) of the Dentists Act (Matter C) for registration as a Dental Therapist. The Committee also remained mindful of the overarching statutory objective of the GDC and its task in assessing whether you would be a safe and competent practitioner under this title.

42. The Committee took into account that it had before it today evidence that was not before the second assessment panel in July 2025, which included your oral evidence. The Committee found you to be a credible witness, who was clear, thorough and honest in the answers that you gave in questioning. The Committee found that you were candid in answering the questions put to you about your career timeline and in relation to the level of your supervision when you returned to work in Sudan in 2025. The Committee was satisfied on the evidence that you have at least 12 years' experience working as a Dentist in Sudan, and it considered it reasonable that in these circumstances you would not have required direct supervision of your work when you returned for that 12-week period. The Committee found credible your evidence about being supervised for some adult extractions, which can be complicated procedures, whilst being left to work independently on clinical procedures with which you were more confident.

43. The Committee also found that you were honest in explaining why it was you had applied to be a Dental Therapist, when you had qualified as a Dentist. You told the Committee that you wanted to focus on the areas of dentistry that you enjoyed and that those areas align with the scope of practice of a Dental Therapist.

44. In considering your most recent clinical experience, the Committee did have some initial concerns about the Professional Work Reference that you provided dated 18 August 2025. It noted the generic nature of that reference and considered that it did not contain as much detail as it would have expected about the specific work that you undertook whilst working as a Dentist in Sudan, including when you returned in 2025. However, having heard from you today, the Committee was satisfied that you demonstrated a good level of knowledge and experience relevant to the practice of a Dental Therapist. It found that, broadly, you answered satisfactorily the majority of the questions asked of you.

45. The Committee considered that there were some areas that you answered less well, such as those on minimally invasive dentistry and your understanding of Patient Group Directions. However, the Committee considered that you did have some knowledge of these areas. It also noted that you have undertaken CPD in relation to Patient Group Directions and provided self-reflections on the topic, albeit this was some time ago. Accordingly, the Committee did not consider that the limitations of your answers in these areas represented a significant concern. It found that you demonstrated a level of professionalism and integrity in your answers given in evidence, particularly around professional boundaries and the scope of practice of a Dental Therapist. The Committee was confident from your responses that you are the kind of practitioner who would seek the assistance of colleagues if you were unsure of anything. It was also reassured by your evidence that you have already researched refresher courses you could complete in the event of being granted registration. The Committee noted that there are some courses that you cannot undertake currently as a trainee Dental Nurse.

46. The Committee had regard to the individual learning outcomes identified by the second assessment panel as deficient, as set out on the decision letter of 22 July 2025. It was the view of the Committee, having considered all the evidence before it today, that those learning outcomes have been sufficiently addressed. In reaching its decision, the Committee took into account that your undergraduate qualification encompassed all the elements relevant to the work of a Dental Therapist, that you have 12 years previous experience working as a Dentist, including undertaking work that a Dental Therapist would undertake, that you have demonstrated a good level of relevant knowledge, that you have experience of UK dental practice, which has included the working with and observation of Dental Therapist and Dentist colleagues, and that you have been proactive in undertaking targeted CPD and self-reflections. The Committee also took into account your significant effort in returning to Sudan in 2025 to ensure that you refreshed your skills. Whilst the Committee noted that this was 12-

weeks practice in the last four years, it noted that it is not uncommon for professionals to have career breaks. It also bore in mind your many years of previous practice.

47. In all the circumstances, the Committee was satisfied that you have demonstrated that you do have the requisite knowledge and skill to be registered as a Dental Therapist in the UK.

48. The Committee therefore determined to allow your appeal.

Remittal back to the Registrar in relation to Matter D only

49. The only matter for consideration at this appeal was in relation to your knowledge and skill for registration as a Dental Therapist. The Committee has determined that you do have the requisite knowledge and skill to be registered under this title and has determined to grant your appeal on this basis.

50. However, as explained during the course of these proceedings, there remain the outstanding requirements for registration under Matter D which, the Committee understands, may not have been fully assessed by the GDC's Registrations Department. These are the requirements relating to your identity, whether you have the necessary knowledge of English, are of good character and are of good health.

51. In the circumstances, the Committee remits your case to the Registrar to dispose of in accordance with its direction that:

You are entitled to be entered onto the DCP Register as a Dental Therapist subject to the GDC having assessed you as suitable for registration under Matter D.

52. That concludes this determination.