

PUBLIC HEARING**Registration Appeals Committee
(Registration Appeal Hearing)****3 July 2026****Name:** BANGLAWALA, Bilal Ahmed Ismail**Case number:** CAS-211932-X8R0S0

General Dental Council: Mr James Halliday, Counsel.
Instructed by Needa Bhatti, ILAS**Registrant:** Present
Unrepresented

Outcome: Appeal dismissed

Committee members: Martin Isherwood (Dental Care Professional) (Chair)
Anjana Varshani (Dentist)
Catherine Pease (Lay)**Legal adviser:** Graeme Dalglish**Professional Adviser:** Malcolm Smith**Committee Secretary:** Andrew Keeling

Mr Banglawala,

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 dental therapist in the UK. You attended the hearing, but you were not represented. Mr James Halliday, Counsel, appeared on behalf of the GDC. The hearing was held remotely on Microsoft Teams.

Legal Framework

2. Prior to 08 March 2023, an applicant who held an overseas diploma in dentistry was able to apply to join the dental care professionals (“DCP”) register. However, applicants can no longer rely on this qualification but must now hold a relevant DCP qualification in order to join the dental care professionals’ register.
3. Your application was received on 6 February 2023. Therefore, this determination has referred to the relevant parts of the Dentists Act 1984 that were in place at the time of your application to the Council.

The Dentists Act 1984 (as amended) (“the Act”)

4. 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)-(6) (as of 31 December 2020 till 7 March 2023) stated 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) (a) of matter A or C, and
 - (b) (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) 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).*

(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 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."*

5. When determining whether you have the requisite knowledge and skill, the Committee is required under Section 36C(5)(a) of the Act to take into account all your relevant qualifications, and all relevant knowledge or experience, wherever acquired. The Council does have the power to require an applicant to perform a test or assessment, however the Committee should note that the Council does not currently ask applicants to undertake a test or an assessment.
6. Your application for registration as a dental therapist is made under Section 36C of the Act. You are seeking to rely on a Bachelor's degree in Dental Surgery obtained in India in 2016. You are seeking to demonstrate that you are suitable for registration as a dental therapist by satisfying the Registrar of Matters C and D:
 - a. In respect of Matter C, that is that you hold a qualification or qualifications granted by an institution or institutions outside the United Kingdom relevant to the dental therapist title and you have satisfied the Council that you have the requisite knowledge and skill to practise as a dental therapist.
 - b. With regard to Matter D, that you have satisfied the Registrar of your identity,

your knowledge of English, that you are of good character and good health, both physically and mentally.

7. The only matter being considered as part of this appeal is whether you satisfy the Registrar of Matter C.

Background

Your application for registration

8. On 6 February 2023, the Council received your application for registration as a dental therapist. You have been registered with the Council as a dental nurse from 11 September 2019, and as a dental hygienist from 25 May 2021.

Correspondence

9. On 8 April 2024 the Council informed you that your application was incomplete and outlined the information that was outstanding.
10. Between 26 April 2024 and 1 May 2024, you were in correspondence with the Council in respect of the Council's request for further information. On 7 May 2024, the Council informed you that the further information provided via post had been received.
11. On 2 July 2024, the Council received an email from you asking for a copy of the university degree syllabus that you had provided with an earlier dental hygienist application.
12. On 2 August 2024, you were informed that your application was ready to be sent for an assessment by the Registration Assessment Panel, and that you would be provided with a decision on your application following this.

Assessments of application and decisions

First assessment

13. Your application was first considered by the Panel on 14 November 2024.
14. Three assessors considered your application with all determining that you could not be recommended for registration as a dental therapist.
15. Taking into account all your qualifications and knowledge and skill, the Panel considered that you did not demonstrate the requisite knowledge and skill to be eligible for registration as a dental therapist with the Council. Therefore, the Panel

recommended that you be refused registration.

16. The Registrar relied on the Panel's recommendation and made the decision to refuse your application for registration as a dental therapist in the DCP register. The Council notified you on 25 November 2024 that your application for registration with the Council as a dental therapist had been refused.
17. You were informed that you were not eligible for registration as a dental therapist as you had not satisfied the Registrar that you had the requisite knowledge and skill. The letter detailed that a number of learning outcomes appeared not to have been covered as part of your training or professional experience.
18. You were also informed that any professional reference which was submitted to address the above learning outcomes should include details of the dates and hours worked and provide evidence of recent clinical experience for the role of a dental therapist.
19. On 7 January 2025, the Council received an email from you informing it that you had sent a copy of a clinical reference to the Council via post and that the Council should have also received a copy of the same reference directly from your referee.
20. On 7 January 2025, the Council emailed you to confirm that the documents for the reassessment of your application were currently being processed.
21. On 17 February 2025, the Council emailed you to query whether you had any further recent clinical experience as a dentist from 21 February 2023. The Council recommended that you provide an updated CV.
22. On 20 February 2025, you replied to the Council confirming that you had no additional clinical experience as a dentist from 21 February 2023 to date and that you had been working full time as a dental hygienist. In addition, you explained that a referee had submitted a reference on your behalf and that you had also provided references to the Council covering the period, January-February 2023, via post. You also provided an updated copy of your CV.
23. On 21 February 2025 the Council replied to you to acknowledge your email and confirmed that a copy of the reference and your updated CV were included in the bundle of documents being processed for a reassessment of your application.

Further assessment

24. Your application was further considered by the Panel on 8 May 2025. This consisted of the original decision letter, along with:
 - a reference dated 12 December 2024;

- further copies of five references already provided for the Panel's initial assessment ;
- an updated CV.

25. Three assessors considered your application with all determining that you could not be recommended for registration as a dental therapist.
26. Taking into account all your qualifications and knowledge and experience, the Panel considered that you did not demonstrate the requisite knowledge and skill to be eligible for registration as a dental therapist with the Council. Therefore, the Panel recommended that you be refused registration.
27. Subsequently, the Registrar relied on the Panel's recommendation and made the decision to refuse your application for registration as a dental therapist in the dental care professionals' register.
28. The Council notified you on 21 May 2025 that your application for registration with the Council as a dental therapist had been refused.
29. You were informed that you were not eligible for registration as a dental therapist as you had not satisfied the Registrar that you had the requisite knowledge and skill. The letter detailed a number of learning outcomes that appeared not to have been covered as part of your training or professional experience.
30. The letter also set out that that you had a right to appeal the decision and the deadline by which such an appeal should be received.

Notice of Appeal

31. On 18 June 2025, the Council received an email from you attaching a Notice of Appeal ("NOA") in which you confirmed your wish to appeal the decision of 21 May 2025 to refuse you registration in the dental care professionals' register as a dental therapist.
32. Within the NOA, you stated that you were appealing the Council's decision as you felt it was not fair and that you had provided all the required evidence to support your application.
33. On 26 June 2026 the Dental Professionals Hearings Service received further information from you in support of your appeal.
34. Your covering letter set out the following:
- a. You were a highly motivated dental professional with extensive experience – you held a Bachelor of Dental Surgery qualification from India and had considerable experience working as a dentist in India whereby you examined

patients and undertook a range of treatments. You had previously submitted a reference attesting to this.

- b. In the UK you demonstrated a continuous commitment to the profession. You had been registered with the Council as a dental nurse since September 2019 and a dental hygienist since May 2021.
- c. You worked within the scope of your practice and took pride and worked with integrity in your roles. You would continue working in this way as a dental therapist.
- d. You understood your application as a dental therapist had been rejected due to a perceived lack of recent clinical references. You had been unable to return to India to undertake further clinical work due to your ongoing work commitments. However, you wished to assure the Committee that you held the required skills through your previous work as a dentist and currently within your role as a dental hygienist.
- e. You had a thorough understanding of the UK dental system and the Council's professional standards. You were committed to patient care and the profession.
- f. You had proactively undertaken further CPD in various areas as well as self-reflection on the SDCEP guidance on prevention and management of dental caries in children which had increased your knowledge of UK paediatric care.
- g. You requested that the Committee consider your international experience as a dentist, your current registrations with the Council and your ongoing commitment to professional development when considering your appeal. You were a dedicated professional who had proven your ability to practise safely and effectively in the UK through your role as a dental hygienist. You were prepared to provide any further information as required.

35. The further information provided consisted of the following:

- a. Self-Reflection on SDCEP – Prevention and Management of Dental Caries in Children
- b. CPD certificates

Oral Evidence and Submissions

36. Mr Halliday, on behalf of the GDC, took the Committee through the background and legal framework in respect of this case. He submitted that the burden was on you to satisfy the Committee that you have the requisite knowledge and skill to be registered as a dental therapist.

37. You gave oral evidence at this hearing and answered questions from the Professional Adviser, Mr Halliday and the Committee.
38. You answered questions in respect of your undergraduate training and internship as a dentist and confirmed that this covered all the procedures you would be required to undertake as a dental therapist in the UK. You then answered a range of questions, including in respect of your professional experience as a dentist in India and as a dental nurse and dental hygienist in the UK. You also stated your understanding of certain procedures and guidelines in the UK, including about the scope of practice of a dental therapist.
39. In closing submissions, Mr Halliday submitted that during your oral evidence you struggled to answer a number of the questions put to you by the Professional Adviser and Committee. He submitted that your answers lacked detail and it appeared that you did not understand the scope of practice of a dental therapist. He also submitted that you were slow to answer questions as you kept referring to your notes and other documents. He submitted that the Committee should also bear in mind that you have only practised as a dentist, performing procedures relevant to the role of a dental therapist, for a total six weeks within the last 10 years in India. You accepted that was correct.
40. Mr Halliday invited the Committee to dismiss the appeal as you have not satisfactorily demonstrated that you have the requisite knowledge and skill to work as a dental therapist in the UK.
41. You were invited to provide any closing submissions to the Committee. However, you chose not to do so.

The Committee's Powers

42. 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

43. The Committee has carefully considered your appeal. It has taken account of all the documentary evidence and of the submissions made by Mr Halliday and your oral evidence. It accepted the advice of the Professional Adviser and the Legal Adviser.
44. In respect of your oral evidence, the Committee considered that a number of your answers to the questions put to you by the Professional Adviser were vague and lacking in detail. In particular, when answering the question about the possible complications arising from periodontal surgery, you did not mention pain or infection. Furthermore, you struggled to answer questions effectively regarding caries management in small children and the scope of practice of a dental therapist. The Committee also noted that you were not able to answer some of the questions without looking at either your notes or other documents.
45. In respect of any recent practical experience in the areas that you would expect to be working in as a dental therapist, the Committee considered that this was insufficient. It noted that you have only worked as a dentist for a total of six weeks within the last 10 years, with the most recent period being in 2023. The Committee found that post-graduation you lacked the opportunity to gain the required skills.
46. 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 dental therapist. The Committee also bore in mind the overarching objectives of the GDC, which included protecting the public and maintaining public confidence in the profession.
47. The Committee noted from the references you have provided, that you are well-liked and proficient in your roles as a dental nurse and dental hygienist in the UK. However, owing to your lack of recent practical experience in providing some of the treatments which would be required of a dental therapist and the difficulties you faced today in sufficiently answering some of the questions during your oral evidence, the Committee could not be satisfied that you had the requisite knowledge and skill to be registered as a dental therapist as required under Section 36C(4) of the Act.
48. Therefore, the Committee has determined to dismiss your appeal.
49. That concludes this hearing.