Dental Professionals Hearings Service

PUBLIC DETERMINATION

Registrations Appeal Committee
Registrations Appeal Hearing

10 November 2025

Name:	CHELLAPURAM, Anusha
Case number:	CAS-211916-P5X5L7

General Dental Council:	Mr Christopher Hamlet (Counsel) Instructed by IHLPS
Appellant:	Present Represented by Deacon Joice James Pallickamyalil (Lay)

Decision:	Appeal dismissed

Committee members:	Anthony Mole	(Chair, lay member)
	Alison Mayell	(Dentist member)
	Victoria Hewson	(Dental Care Professional member)
Professional adviser:	Bev Littlemore	
Legal adviser:	William Hoskins	
Committee Secretary:	Sara Page	

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 to refuse your application for entry to the register as a dental hygienist and dental therapist.

2. The members of the Committee, as well as the Professional Adviser, 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 represented by Deacon Joice James Pallickamyalil, lay representative.

4. Mr Christopher Hamlet, Counsel, appeared as case presenter on behalf of the GDC.

Background

5. You submitted an application for registration as a dental therapist and an application for registration as a dental hygienist on 7 March 2023 along with your supporting documentation.

6. Your applications for registration as a dental therapist and dental hygienist are made under section 36C of the Act. You are seeking to rely on a Bachelor of Dental Surgery (BDS) qualification obtained from Sri Rajiv Gandhi, College of Dental Sciences and Hospital, India. You seek to demonstrate that you are suitable for registration as a dental therapist and as a dental hygienist by satisfying the Registrar of Matters C and D.

7. Between 11 March 2023 and 29 September 2024, there was a large number of emails between you and the Council to ensure that your application was complete and ready for consideration by the Registration Assessment Panel ("the Panel"). The Council was provided with an up-to-date Curriculum Vitae (CV), a recent professional reference, Continuing Professional Development (CPD) evidence, the original signed structured reference, the original signed certificate of good standing, and the original signed affidavit.

8. On 27 September 2024, the Council notified you that your applications were complete and ready to be presented to an assessment panel in December 2024. You were informed that your application would be assessed and a decision made by the Registrar following the Panel's assessment.

<u>First Panel assessment of application and decision</u>

9. Three assessors formed a Panel on 5 December 2024 and conducted an assessment of your application. In relation to your applications, the Panel was not satisfied that the content of the training course which led to the award of your qualification met the standard in preparing to practice. Further, having taken into account the information provided by you about your professional experience and any additional training undertaken, the Panel was not satisfied that this experience covered the shortfalls identified.

10. Having considered all of your qualifications, knowledge and experience wherever acquired, the Panel did not consider that you had demonstrated the requisite knowledge and skill to be eligible for registration as a dental therapist or as a dental hygienist. On this basis, the Panel did not recommend your entry onto the register either as a dental therapist or as a dental hygienist.

11. The reasons for the refusal decision were set out in the two letters, one for the dental therapist title and the other for dental hygienist title. You were notified that you had the right to appeal against the refusal decision and provided details of the appeal process. Further, you were advised that if you had new or additional information to address the deficiencies found in his training, you could apply for a new assessment by 14 January 2025.

Correspondence

12. Between 10 January 2025 and 10 April 2025, there was various correspondence between you and the Council in respect of further information to be provided in support of your application and the format of such information. This included a professional reference, a cover letter, various learning outcomes, self-reflections, CPD & webinar attendances, and an updated CV.

13. On 10 April 2025, the Council emailed you to confirm receipt of your reassessment documents and to confirm that your application had been listed for reassessment at a May 2025 Panel meeting.

Reassessment of application and outcome

14. Three assessors formed a Panel on 7 May 2025 and conducted an assessment of your updated application. The Panel considered the additional documents provided by you when making their assessment decision.

15. In relation to your applications, the Panel took into account the information provided by you about your professional experience and any additional training undertaken and was not satisfied that this experience covered the shortfalls identified.

16. Having considered all of your qualifications, knowledge and experience wherever acquired, the Panel did not consider that you had demonstrated the requisite knowledge and skill to be eligible for registration as a dental therapist or as a dental hygienist. On this basis, the Panel did not recommend your entry onto the register as either a dental therapist or as a dental hygienist.

17. The Registrar relied on the Panel's recommendation and wrote to you, providing the outcome of your applications by email. Two outcome letters were attached to the email, for each of the two Dental Care Professional (DCP) titles. The reasons for the refusal decision were set out in the respective letters.

18. 22 learning outcomes were identified as not having been met in respect of your dental therapist application and 15 learning outcomes were identified as not having been met in respect of your dental hygienist application.

19. You were advised that as a result of the route closure in which you had applied, the GDC would not be able to process your application any further as you did not hold any relevant overseas qualification for registration as a dental care professional. Further, you were notified that you had the right to appeal against the refusal decision by 30 May 2025 and provided details of the appeal process.

20. You were informed that if you had new or additional information to address the identified deficiencies, you were welcome to apply for a new assessment. However, given that you had been provided an opportunity to provide additional information for the Panel to review, you would be required to pay the registration application fee for any future attempt.

Notice of Appeal

21. On 23 June 2025, the Council received a Notice of Appeal ("NOA") from you. Within the NOA, in relation to both your dental hygienist and dental therapist appeal, you submitted:

    a) your BDS qualification would meet or exceed the knowledge and skills requirements for registration as a dental therapist and dental hygienist;
    b) you have evidence of clinical experience through your rotatory one-year internship;
    c) your professional work references in the application were not given appropriate weight or consideration;
    d) your evidence of competency-based assessment was not given appropriate weight or consideration;
    e) your evidence of competency-based assessment demonstrate ability where your practical experience is limited;
    f) there is no published GDC policy on required duration of clinical experience; and
    g) your application contains sufficient evidence to meet the requirements for registration under the titles dental hygienist and dental therapist.

22. You asked for all relevant documentation to be considered, and a fresh decision made.

Evidence

23. The Committee was provided with a number of bundles, Exhibits 1 – 6, and was assisted by oral evidence provided by you under affirmation during the course of the appeal hearing.

Submissions

24. In its case summary, the GDC stated that as this is your appeal, the burden is on you to satisfy the Committee that you have the requisite knowledge and skill required for registration under section 36C(4) of the Act (Matter C). The case summary stated that two separate Panels assessed your qualification and the supporting documentation provided but continued to have concerns that a number of learning outcomes had not been covered or met. The case summary stated that you are not eligible for registration as a dental hygienist and/or dental therapist as you have not demonstrated that you possess the requisite knowledge and skill under section 36C(4) of the Act.

25. Mr Hamlet, on behalf of the GDC, stated that in light of the additional documentation, any additional information provided by you in your oral evidence, and any advice given by the Professional Adviser at today's appeal hearing, the GDC's position is one of neutrality and invited the Committee to carefully consider all evidence before it in coming to its decision.

26. Dn Pallickamyalil, on your behalf, referred the Committee to the additional information provided for the purposes of today's appeal including a professional work reference (dated 1 November 2025), an observation confirmation email (dated 3 November 2025), CPD certification, and a self-reflection document (dated 29 August 2024).

27. In addressing the deficient areas of your skills and knowledge identified by the Panel, Dn Pallickamyalil submitted that there is no information relating to why those areas have been identified as insufficient. He submitted that the absence of this information makes the decision procedurally unfair as the GDC should give adequate reasons for its decision. Dn Pallickamyalil submitted that there is no published policy on any minimum clinical requirement and such unpublished criteria should not be a basis for refusal onto the Register. He stated that the

decision letters fail to meet the statutory duty under section 36 of the Act and deprives you of a meaningful opportunity to address concerns. He submitted that through your work as a dentist in India, you have covered the deficient aspects of the dental therapist and dental hygienist roles identified. Dn Pallickamyalil submitted that your competence has been confirmed by your professional reference and that each of the deficiencies in the outcome letter have been addressed in that reference.

28. In referring to you having worked as a dentist in India for two months in 2024, Dn Pallickamyalil referred to the recent decision of the RAC in which, despite having not worked clinically for some five years, an appellant's appeal was allowed and this, he submitted, was inconsistent with treatment of other applicants and demonstrated unfair and differential treatment.

29. Dn Pallickamyalil invited the Committee to consider that by way of the documentation you have provided for today's appeal and the oral evidence you have provided, you have demonstrated that you have sufficiently addressed the deficient learning outcomes outlined in the decision letter of the second Panel.

Committee's decision and reasons

30. 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. The Committee was also assisted by the Professional Adviser, Ms Littlemore, who questioned you in relation to your clinical experience and knowledge.

31. 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 and/or dental hygienist. The Committee also remained mindful of the over-arching statutory objective of the GDC and its task in assessing whether you would be a safe and competent practitioner under either title.

32. In the assessment of the second Panel, 22 learning outcomes were identified as being insufficiently demonstrated in relation to your dental therapist application and a further 15 learning outcomes in relation to your application as a dental hygienist.

33. In its consideration of your clinical experience, the Committee noted that you have been qualified as a dentist in India since July 2018. The Committee acknowledged that you had undertaken clinical work during your internship for a year in India between 2017 and 2018. The Committee further noted that you completed a further year of clinical practice in India in 2019 and then returned to study in the United Kingdom. Since your return to study, you have practised clinically for a limited number of weeks in India in 2024/2025. You confirmed that your clinical practice has not been physically observed by another practitioner since 2018 – 2019, but that you were confident that as your competency had been confirmed in 2018, this level of competency still applied in 2024. The Committee was concerned that you did not demonstrate any insight into how registrants, particularly newly qualified registrants, can deskill. The Committee also took into account that the information provided in the professional reference dated 1 November 2025 was based on your clinical notes, rather than any observation of your clinical practice and therefore was unable to attach much weight to the reference. Whilst the reference did address the learning outcomes identified by the second Panel, the lack of recent observations meant that the Committee could not rely on this document as evidence of your clinical competency.

34. The Committee also took into account the answers you provided to the Committee members' questions and those of the Professional Adviser in your oral evidence. You confirmed today that you have not undertaken any hands-on training modules relating to either the role of a dental

therapist or of a dental hygienist, but that you have observed the roles in person by way of shadowing for one week in a dental practice setting. This observation was detailed in the email from the practice's principal dentist, dated 3 November 2025. There was no information before the Committee regarding how this period of shadowing has addressed the deficient learning outcomes or how this has improved your clinical competency for the roles you have applied for.

35. The Committee noted that, when questioned, there were a number of questions regarding your knowledge of the roles of a dental therapist and/or dental hygienist you have applied for which were not up to date with current practice and that your responses were aligned with your role as a dentist rather than that of a dental therapist or a dental hygienist. For example, when asked how to manage a patient with a Basic Periodontal Examination with a score of 3, your response was not in line with the British Society of Periodontology guidelines. The Committee therefore did not consider that you have demonstrated sufficient insight into the roles that you have applied for.

36. Having considered all the evidence provided, both documentary and oral, the Committee noted that you demonstrated clinical knowledge of the roles you have applied for. However, the Committee was not satisfied that you have sufficiently addressed through directly observed and validated clinical practice all the learning outcomes in relation to a dental therapist and/or dental hygienist that were identified as deficient by the second Panel. The Committee was not satisfied that a review of your clinical records by your professional referee was sufficient to satisfy this requirement.

37. The Committee bore in mind the GDC's overarching objective, which includes the protection of the public and the maintenance of public confidence in the dental professions. The Committee was not satisfied that you have been able to sufficiently demonstrate that you would be able to practise safely and effectively as a dental therapist and/or dental hygienist in the UK.

38. In all the circumstances, the Committee determined to refuse your appeal for registration in the Register.

39. This will be confirmed to you in writing in accordance with the Act.

40. That concludes this determination.