

**PUBLIC HEARING
Registration Appeals Committee
(Registration Appeal Hearing)**

30 October 2025

Name: **VENKATASUBRAMANIAN, Priyanka**

Case number: CAS-211865-S7J1V1

General Dental Council: Mr Andrew Molloy , Counsel
Instructed by Ms Lauren Francis, IHLPS

Registrant: Present and unrepresented

Outcome: Appeal dismissed

Committee members: Zareen Elleby (Chair, DCP Member)
Tara Willmott (Lay Member)
Melissa Oura (Dental Member)

Professional Adviser Malcolm Smith

Legal adviser: William Hoskins

Committee Secretary: Jamie Barge

Dr Venkatasubramanian

1. This is a hearing before the Registration Appeals Committee. 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 section 36J and Schedule 4A of the Dentists Act 1984 (as amended) (the Act).
3. The purpose of this hearing has been for the Committee to consider your appeal against the decision of the Registrar of the General Dental Council (GDC), to refuse your application for registration in the Dental Care Professionals Register ('the DCP Register') as a dental therapist.
4. You are present at these proceedings and accompanied by Dr Faizur Rahmaan. Mr Andrew Molloy, Counsel, appears on behalf of the Registrar for the GDC.

Legal framework and background to the appeal

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 7 October 2025, which was drawn to the Committee's attention by Mr Molloy in his opening submissions.
6. On 6 March 2023 the GDC received your application for registration as a dental care professional under the title of dental therapist, relying on your 2016 Bachelor of Dental Surgery degree and 2021 Master of Dental Surgery; both qualifications were obtained in India.
7. Between 12 June 2024 and 12 September 2024, there were a 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"). Over this period, the Council received additional material, including self-reflections, CPD certificates, and English language evidence certification. All of the additional documentation was before the Panel when making their assessment decision.
8. On 17 September 2024, the Council notified you that your application was complete and ready to be presented to the Panel in January 2025. You were informed that your application would be assessed and a decision made by the Registrar following the Panel's assessment.

First Panel assessment of application and decision

9. Three assessors formed a Registration Assessment Panel (the Panel) on 7 January 2025 and conducted an assessment of your application. 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. The Panel did not consider that you had demonstrated the requisite knowledge and skill (matter C) to be eligible for registration as a dental therapist. It therefore did not recommend your entry onto the register.
10. The Registrar relied on the Panel's recommendation and made the decision to refuse your application for registration as a dental therapist. You were notified of this decision on 27 January 2025. The letter advised you 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 (matter C). The letter confirmed that the Panel had identified 36 learning outcomes which appeared not to have been covered as part of your training or professional experience to allow for registration with the GDC.

11. The letter advised that if you had new or additional information to address the deficiencies, you would be able to send this to the GDC for a further assessment of your application. You were also notified of your right of appeal.

Reassessment of application and outcome

12. On 25 February 2025, the Council received an email from you providing additional evidence for reassessment of your application. On 17 March 2025, the caseworker emailed confirmation that your application was complete and ready for reconsideration by the Registration Assessment Panel in May 2025.

13. Three assessors formed a Panel on 07 May 2025 and conducted a reassessment of the Appellant's application. On the basis of the additional information provided by you, the Panel was of the opinion that 9 learning outcomes had still not been met. On this basis, the Panel did not recommend your entry to the dental care professionals register under the title dental therapist. The Registrar accepted the recommendation of the Panel, and accordingly rejected your application for registration as a dental therapist.

Notice of Appeal

14. On 15 June 2025, the Council received your Notice of Appeal ("NOA") by way of email. You submitted: You are a fully qualified dental professional with nine years of clinical experience including a master's degree in Orthodontics and Dentofacial Orthopaedics from a recognised institution in India.

- a. You provided additional observations on how your experience meets the outstanding competencies.
- b. You are committed and have completed additional trainings to address outstanding learning outcomes.
- c. You requested the Appeal Committee reconsider your application.

15. No further supporting evidence was provided by you at that time.

Today's Hearing

Oral Evidence and Submissions

16. The Registrar's position, as set out in its written submissions dated 7 October 2025, and oral submissions from Mr Molloy, is that you seek to apply to the register under the title of dental therapist, relying on your overseas qualification.

17. Mr Molloy submitted that the GDC's position is based on the outcome of the two decisions made by the Panels on 7 January 2025 and 7 May 2025. That is, that you are not currently eligible to be registered as a dental therapist as you have not satisfied the GDC that you have the requisite knowledge and skill. However, he submitted that the burden was on you to satisfy the Committee that you are eligible for registration and that the Committee could consider any additional material provided by you for your appeal before making its decision.

18. Mr Molloy further sets out that should the Committee be minded to allow the appeal, the Registrar will still need to be satisfied on other matters, relating to your identity, that you have the necessary knowledge of English, that you are of good character and you are in good health.

19. The burden rests on you to satisfy the Committee that you have the requisite knowledge and skills required for registration under section 36C(4) of the Act.

Your position

20. You gave oral evidence before the Committee in which you maintain that you do have the requisite knowledge and skills for registration as a dental therapist. You rely on the reasons set out in your covering letter to the Dental Professionals Hearings Service, as well as the targeted Continuing Professional Development (CPD) related to the learning outcomes. You stated that whilst in India you worked under Dr Rahmaan's supervision at his dental practice in India, in addition to a number of other dental practices. You used examples of your dental practice that address each of the deficient learning outcomes for a dental therapist. You also rely on detailed professional references provided and stated that any issues of clarification are subjective. You stated that the GDC asked you to submit additional CPD and self-reflection to strengthen your application. You informed the Committee that you had already provided much of this information but provided it again with further evidence of targeted CPD, self-reflections and have covered all areas of concern. You stated that you have eight plus years of clinical experience as a dentist in India, including approximately four plus years of orthodontic practice.

21. You stated you have treated patients with care and patience. You have recently completed a fellowship of laser dentistry in India overseen by the London Dental Institute. You stated that to work in England has always been your childhood dream.

22. In answer to questions from the Professional Adviser and the Committee, you set out the background to your undergraduate training in India, including the practical clinical experience you gained whilst working with Dr Rahmaan during your internship and as a full time Dentist. You also provided details of the type of work you currently undertake as a dentist and also as a consultant orthodontist at a community-based practice in India. You stated that you split your work between three practices which cover both private and community work. You confirmed your daily workload includes seeing eight to ten patients minimum.

23. Dr Rahmaan stated that you worked with him at his practice since 2015. He said you treat patients well and he spoke very highly of you.

The Committee's Powers

24. A decision by the Registrar not to register a person's name in the dental care professional's 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 on your appeal

25. The Committee took account of the submissions made by Mr Molloy on behalf of the Registrar and submissions from you. It accepted the advice of the independent Professional Adviser and that of the independent Legal Adviser.

26. The Committee considered all the evidence presented to it, both documentary and your oral evidence. This included your detailed written statement in which you set out the steps you have

taken to address the GDC's concerns. It also had regard to the professional reference from Dr Rahmaan a dentist in India whom you work with, who sets out in detail how, in his opinion you have addressed each of the learning outcomes. In your oral evidence you detailed the clinical work you undertake as a dentist and orthodontist in India, particularly with Dr Rahmann since 2017.

27. The Committee noted you have undertaken a large amount of CPD and learning, The Committee took into account the nine learning outcomes relevant to the role of a dental therapist, which were identified as deficient by the second assessment panel. The Committee took into account your oral evidence and submissions regarding that panel's assessment. The task of the Committee today was to carry out a fresh review of your application to reach its own decision, taking into account all the evidence before it.

28. The Committee took into account that you state that you have addressed each of the learning outcomes in your oral evidence today. In doing so, you referred the Committee to what you considered to be the relevant parts of your professional work references and experience in India as a dentist, as well as your CPD and self-reflections. Whilst the Committee commends the efforts you have made with your application, it considered, that in your oral evidence, you were unable to demonstrate satisfactory knowledge of current guidelines, treatment modalities and scope of practice pertaining to the role of a dental therapist and related to the outstanding learning outcomes.

29. The Committee was not satisfied that you fully understood the difference in scope of practice between your current role as a dentist in India, and that of a dental therapist in the United Kingdom. In particular, during Committee questions, your understanding of the role of a dental therapist was deficient in relation to the requirements of the current British Society of Periodontology (BSP) guidelines, tooth whitening, in particular the need for a dentist to prescribe the bleaching materials, and the implications of Direct Access. The Committee noted that you have no experience of observing dental therapists in practice, particularly in the United Kingdom.

30. For the reasons set out above, the Committee was not satisfied that you have sufficiently demonstrated all the requisite knowledge and skills required of a dental therapist in the United Kingdom.

31. That concludes this determination.