

**PUBLIC HEARING****Registration Appeals Committee  
(Registration Appeal Hearing)****23 July 2026**

**Name:** THAPA, Sweatcha  
**Registration number:** 280889  
**Case number:** CAS-215425-F3P8H8

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**General Dental Council:** Tom Stevens, Counsel  
Instructed by Rochelle Williams, ILPS  
**Registrant:** Present  
Unrepresented

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**Outcome:** Appeals dismissed

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**Committee members:** James Hurden (Chair, Lay Member)  
Christopher Parker (Dental Care Professional Member)  
Michael Speakman (Dentist Member)  
**Legal adviser:** Mark Sullivan  
**Professional Adviser:** Marina Harris  
**Committee Secretary:** Jenny Hazell

Miss Thapa,

1. This is a hearing before the Registration Appeals Committee. 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).
2. You are present at these proceedings, unrepresented. Mr Stevens, Counsel, appears on behalf of the General Dental Council (GDC).
3. The purpose of this hearing is to consider your appeal against the Registrar's decision dated 9 February 2026 not to grant your application for registration in the Dental Care Professionals Register DCP) under the titles of a Dental Therapist and a Dental Hygienist. You are currently registered with the GDC as a Dental Nurse.

### **Legal framework and background to the appeal**

4. The Committee had regard to the legal framework and factual background to this appeal, as set out in the GDC's written case summary dated July 2026, which was drawn to the Committee's attention by Mr Stevens in his opening submissions.
5. The issue on the appeal is whether you meet the requirements of Matter C as set out in section 36C(4) of the Dentists Act 1984 (as amended) (the Act).
6. 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 she has the requisite knowledge and skill to practise as a member of the profession or class to which the title applies*
7. However 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).'*

8. It is not in issue that the qualification that you hold complies with Section 36C(4A)(a). The matters for the Committee's consideration are therefore whether your qualification complies with the requirements of Section 36C(4A)(b) in that it demonstrates the requisite knowledge and skill to that demonstrated by an equivalent UK qualification. If it does not, then the Committee must be satisfied that you meet the requirements of Section 36C(4)(b) in that you have the requisite knowledge and skill to practise as a member of the profession under either or both titles. In considering whether you meet the requirements of Section 36C(4)(b) the Committee shall take into account all of your relevant qualifications and all relevant knowledge or experience wherever acquired.

9. On 10 and 11 November 2024 the GDC received your applications for registration under the titles of a Dental Therapist and a Dental Hygienist. In support of your applications you relied on a combined Dental Therapist and Dental Hygienist qualification obtained in 2024 from the University in Bari, Italy (the Università Degli Studi Di Bari Aldo Moro).

### **First Panel assessment of application and Registrar's decision dated 23 April 2025**

10. Three assessors formed a Registration Assessment Panel on 9 April 2025 and conducted an assessment of your application. The Panel recommended that you be refused registration under the titles of Dental Therapist and a Dental Hygienist. This was because the Panel was not satisfied that you had demonstrated the requisite knowledge and skill (matter C) to be eligible for registration as Dental Therapist or a Dental Hygienist. It identified a number of learning outcomes as not having been covered as part of your training or professional experience to allow registration with the GDC.

11. The Registrar relied on the Panel's recommendation and decided to refuse your application for registration as a Dental Therapist and a Dental Hygienist. You were notified of both decisions on 23 April 2025. The letters set out the learning outcomes that appeared as not having been covered as part of your training or professional experience to allow registration with the GDC.

12. Both letters listed specific documents and information that you ought to provide in order to demonstrate how your qualification and training would meet the necessary requirements for registration. This included you being asked to provide a letter from the Università Degli Studi Di Bari Aldo Moro providing further information.

13. Between 19 and 28 May 2025, there was an exchange of correspondence, via email, between you and the GDC regarding the outcome of your applications and additional documents for your application to be reassessed

### **Second Panel assessment of application and Registrar's decision dated 17 July 2025**

14. Three assessors formed a Registration Assessment Panel on 16 July 2025 and conducted a reassessment of your applications.

15. Following the Panel's re-assessment of your applications, the Registrar relied on the Panel's recommendation that you did not possess the requisite knowledge and skill to be registered as a Dental Therapist or a Dental Hygienist and as such, the Registrar refused your applications. You were notified of the Registrar's decision by email and joint decision letter dated 17 July 2025.

16. The joint decision letter set out that the letter provided from the Università Degli Studi Di Bari Aldo, did not address the outstanding queries, or satisfy equivalence to a UK training programme. The letter further stated that although you had provided a Certificate of Good Standing, the GDC was unable to determine whether this qualification has and would allow you to practice as a Dental Hygienist and/or dental therapist in Romania and/or Italy.

17. Between July 2025 and September 2025, you corresponded with the GDC in respect of your applications.

### **Third Panel assessment of application and Registrar's decision dated 27 October 2025**

18. Three assessors formed a Registration Assessment Panel on 22 October 2025 and conducted a reassessment of your application to be registered as a Dental Therapist or a Dental Hygienist.

19. Following the Panel's reassessment of the Appellant's application for registration as a Dental Hygienist and a Dental Therapist, the Registrar relied on the Panel's recommendation that you did not possess the requisite knowledge and skill to be registered as a Dental Therapist or a Dental Hygienist and therefore the Registrar refused your applications.

20. The decision letter dated 27 October 2025 set out that the additional evidence provided by you had been assessed by the Panel and the Council had decided that the course completed by you does not satisfy equivalence to a UK training programme and would not be suitable to be accepted for registration. The letter set out in detail issues which had not been sufficiently answered. This including the Registrar's assessment that the letter from the Italian regulator, the press release, and the letter of Good Standing are not accepted as evidence that the qualification would be registerable.

21. Between November 2025 and December 2025, there was further communications between you and the GDC in respect of your applications.

#### **Fourth Panel assessment of application and Registrar's decision dated 9 February 2026**

22. Three assessors formed a Registration Assessment Panel on 7 January 2026 and conducted a reassessment of your application to be registered as a Dental Therapist and a Dental Hygienist.

23. Following that Panel's reassessment of your applications for registration as a Dental Therapist or a Dental Hygienist, the Registrar relied on the Panel's recommendation that you did not possess the requisite knowledge and skill to be registered as a Dental Therapist or a Dental Hygienist. Therefore the Registrar refused your application.

24. The decision letters dated 9 February 2026 relating to both titles stated that the additional evidence provided by you had been reassessed by the Panel. The Registrar had decided that the courses completed by you do not satisfy equivalence to a UK training programme and would not be suitable to be accepted for registration with the GDC. The letters confirmed the reasons for refusal as being:

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

25. For both applications, you were advised that if you had new or additional information which addressed the deficiencies in the decision letters you could submit this by 9 March 2026, in order that your applications are reassessed as new applications. You were notified of your right to appeal in writing by 11 March 2026.

#### **Your appeal**

26. On 28 February 2026 you submitted a Notice of Appeal against the Registrar's decision. In support of your appeal you set out that the letter dated 7 August 2025 from the Associate Professor of the University of Bari where you obtained your combined Dental Therapist and Dental Hygienist qualification, confirms your registrability. You stated that the evidence directly addresses every deficiency listed in the outcome letters dated 23 April 2025, 17 July 2025, 27 October 2025 and 9 February 2026.

27. You also contended that the assessments involved significant irregularities and a failure to properly consider all the evidence submitted. You also maintain that there was an “appearance of predetermination or an institutional lack of neutrality with respect to this particular university.”

28. As part of this appeal you provided the GDC with a letter dated 7 August 2025 from a professional colleague (Person A) who provided information regarding the clinical practice you acquired during your clinical practice internships and further references. You also provided copies of two Registration Appeal determinations dated 19 February 2026 and 26 May 2026 in which both appeals were allowed.

### **The Registrar’s position**

29. The Registrar’s position is that it rejects any assertion of unfairness or impartiality. It sets out that the last assessment of your applications and supporting material were conducted by a separate Panel and in any event, all assessments have been supported by clear reasons. The GDC makes the point that for the purposes of the final reassessment, you did not produce any additional evidence in respect of the Dental Therapist title.

30. The GDC reminds the Committee that the burden is on you to satisfy it that you have the requisite knowledge and skill to practise as a Dental Therapist. It submitted that two separate Panels assessed your qualification and the information you provided and had concerns that a number of learning outcomes had not been covered or met. The Registrar maintains that you are not eligible for registration as a dental therapist as you have not demonstrated to the GDC that you possess the requisite knowledge and skill to practise as a Dental Therapist and/or a Dental Hygienist.

### **Your position**

31. You maintain that you do have the requisite knowledge and skill to practise as a Dental Therapist and/or a Dental Hygienist. You maintain that the qualification you obtained in 2024 from the University of Bari satisfies equivalence to a UK training programme, as demonstrated by the letter provided by the University of Bari, which sets out the clinical activities for the programme.

32. In answers to questions from the Professional Adviser, you provided further information about the training programme you undertook at the University of Bari which led to you qualifying in 2024 with a combined Dental Therapist and Dental Hygienist qualification. You explained that the first year comprised theoretical training in Italy, which was assessed, before carrying out practical experience on phantom heads and patients in the second year in Romania. You explained to the Committee that a clinical log book of each of the cases was maintained for the first and the second year of study and that the work was signed off electronically by a supervisor. You further stated that this electronic log book was held by the University of Bari, that you had requested it, but you had not been provided it. You described some of the clinical procedures you carried out as part of your undergraduate training such as taking BPE scores and root surface debridement. You further explained that you had undertaken some 25 pulpotomies as part of your undergraduate training. You estimated having carried out clinical procedures on around 100 patients during your undergraduate studies. However, the Committee noted that there was no documentary evidence to support your evidence regarding the number of patients you had treated or the type of treatment you had undertaken.

33. It was your evidence that during your undergraduate internship you saw around 25 to 30 patients a day. You told the Committee on more than one occasion that you had provided the GDC with a copy of the clinical log book, although it noted that the only log book before it was the internship notebook.

34. You gave oral evidence about your work experience as a Dental Hygienist in India after you had graduated. This covered the periods from September to November 2024; May to November

2025 and from March to May 2026. In response to questions by the Committee, you confirmed in your evidence that this amounted to about 15 days, over a 13 month period, during which time you saw around 8 patients per day. You confirmed in your evidence that you had not worked as a Dental Therapist.

### **The Committee's decision on your appeal**

35. The Committee took account of all of the material that you had previously provided to the Registrar, the further material provided to this Committee, the submissions made by Mr Stevens on behalf of the GDC as well as your oral evidence. It accepted the advice of the Professional Adviser and that of the Legal Adviser present at these proceedings. It is aware that it is required to look at the matter afresh and that it is not bound by the decisions of the previous Assessment Panels.

36. The Committee is also aware that it is not bound by the decisions of the two Registration Appeal determinations dated 19 February 2026 and 26 May 2026.

### **Overseas qualification as a Dental Therapist**

37. The Committee first considered whether your overseas qualification obtained from the University of Bari demonstrates a comparable level of knowledge and skill to an approved UK qualification for a Dental Therapist. It notes from the Internship notebook from the University of Bari that the internship comprises 566 hours, with a duration of 8 hours per day on Saturdays, 6 hours per day on Sundays and 8 hours per day on holidays. The only evidence of purported Dental Therapist duties set out in the Internship notebook relate to two sessions of two days in which the work recorded related solely to the Dental Hygienist scope of practice. Furthermore, there is no evidence of any feedback on the clinical activities carried out, or that you had undertaken and passed gateway and end point assessment of your clinical competence; all of which are central to how UK therapists are assessed during their training. Further, the Committee has borne in mind that the 566 hours of training set out in the Internship notebook is considerably less than the three year degree course that is required for qualification as a Dental Therapist in the UK graduates. There is no evidence that the learning outcomes identified by the previous Assessment Panels have been met.

38. The Committee also considers that your responses regarding the content of the training programme and the number of patients you treated were not supported by the documents before it.

39. Taking all these factors into account, the Committee is not satisfied that your overseas qualification obtained from the University of Bari is comparable to that expected of a UK Dental Therapist qualification.

### **Overseas qualification as a Dental Hygienist**

40. The Committee next considered whether your overseas qualification obtained from the University of Bari demonstrates a comparable level of knowledge and skill to an approved UK qualification for a Dental Hygienist. In so doing, it has had regard to its reasons set out above regarding the length of the course. The Committee accepts that some of the aspects of the training relate to the training of a Dental Hygienist. However, there is no evidence of any assessment of the skills set out in the activities log from March 2024 to June 2024, other than a record of the number of activities. In the Committee's judgement, a log showing the number of hours you have completed (14 hours per weekend over 9 weekends) is insufficient to satisfy it that your overseas qualification obtained from the University of Bari is comparable to that expected of a UK Dental Hygienist qualification where formal gateway and formal end point assessments are core features of how a Dental Hygienist's education is assessed.

41. Accordingly, the Committee is not satisfied that the qualification that you hold meets the requirement of Section 36C(4A) in relation to either title.

### **Requisite knowledge and skills as a Dental Therapist**

42. The Committee has borne 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 Act (Matter C) for registration as a Dental Therapist. 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 this title.

43. The Committee has had regard to the answers you provided to the Professional Adviser and to the Committee at this hearing. It considers that some of the answers you gave, such as the number of pulpotomies you have had undertaken, and the number of patients you said you had treated (some 100) during your undergraduate studies is not borne out by the documentary evidence. Further, it considered that some of your answers were vague and raised concerns about your level of understanding as to the role of a Dental Therapist. When questioned, you were unable to provide an explanation as to your understanding of the role of a periodontist. Further, there was no evidence that you had undertaken any restorative work or that you had carried out an extraction. These are the higher level of skills that are expected of a Dental Therapist.

44. The Committee has also had regard to the professional reference provided dated 29 June 2024 in which the referee sets out the clinical tasks you have undertaken, including implementing protective measures such as *“corrective jaw surgery, palate repair procedures, general anaesthesia and conscious sedation”*. The Committee considers that some of the examples cited do not accord with the scope of practise of a Dental Therapist. It has therefore given limited weight to this reference.

45. The Committee also had regard to the reference dated 4 June 2024, which stated you *“adeptly handled materials such as composite resin and amalgam to restored decayed teeth”*. The Committee also had regard to your oral evidence that you had not used amalgam for restorations. The Committee was unable to place reliance on this reference accordingly. The Committee noted that these were the only references that addressed your skills and knowledge in the role of a Dental Therapist.

46. Overall, the Committee has grave concerns about your understanding of the scope of practice of a Dental Therapist, your understanding of some of the dental terminology required in the role as well as your knowledge and skill.

47. Taking all these factors into account, the Committee is not satisfied that you have the requisite knowledge and skills to be registered under the title of Dental Therapist in accordance with Section 36C(4) of the Act (Matter C).

### **Requisite knowledge and skills as a Dental Hygienist**

48. The Committee has borne 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 Act (Matter C) for registration as a Dental Hygienist. It has borne in mind that you say you have worked as a Dental Hygienist in India since graduating, which amounts to 15 days work, during which time you saw around 8 patients a day. You confirmed in your evidence that during that time you were not registered with a regulatory body in India. The Committee considers that this experience in and of itself is woefully inadequate to satisfy it that the learning outcomes for the role of Dental Hygienist which were identified as deficient by the Fourth Panel in February 2026 have been met.

49. Accordingly, the Committee has concluded that you have not demonstrated that you have the requisite knowledge and skill to be registered under the title of Dental Hygienist in accordance with Section 36C(4) of the Act (Matter C).
50. The Committee therefore determined to refuse your appeal in respect of both applications.
51. That concludes this determination.