

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

8 September 2025

Name: Sreeraj, Saranya

Application number: 11361369

Case number: CAS-211543-Q8G8S4

General Dental Council: Mr James Halliday, Counsel
Instructed by Ms Harriet Goodhew, IHLPS

Registrant: Present, unrepresented

Outcome: Appeal dismissed

Committee members: Jane Everitt (Chair, Lay Member)
Samantha Snoad (Dental Care Professional Member)
Melissa Oura (Dental Member)

Professional Adviser Marina Harris

Legal adviser: Tehniat Watson

Committee Secretary: Jamie Barge

Ms Sreeraj,

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 and as a dental hygienist.
4. You are present at these proceedings and are unrepresented. Mr James Halliday, Counsel, appears on behalf of the Registrar for the GDC.

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 8 August 2024, which was drawn to the Committee's attention by Mr Halliday in his opening submissions.
6. You submitted your application for registration as a dental hygienist and a dental therapist on 6 March 2023. Between 12 July 2024 and 13 August 2024, the Council communicated with you to ensure your application contained the required documents before it could be submitted for consideration. Thereafter, there was an exchange of emails between you and the GDC, clarifying the submission of the supplemental documents required. On 24 October 2024, the Council wrote to you confirming your applications were ready for the January 2025 Registration Assessment Panel ("the Panel") and that a decision would be made by the Registrar in due course.
7. Your applications were assessed by the Panel on 8 January 2025.

Dental hygienist application assessment

8. Your application as a dental hygienist was considered under the Joint Eligibility Recommendation Form for entry to the GDC's Dental Care Professional Register under Matters C and D of Section 36C(4), (5) and (6) of the Act. The assessors noted various learning outcomes that were not sufficiently covered in your application, along with suggestions for evidence that would demonstrate the learning outcomes.
9. In particular, the Panel did not consider the content of your training course met the standard in 'Preparing for Practice. In addition, they did not consider your professional experience and additional training covered the shortfalls in your training. Having considered the available evidence, the Panel did not consider you had demonstrated the requisite knowledge and skill to be eligible for registration. Accordingly, the Panel did not recommend entry onto the DCP register as a Dental Hygienist
10. The Registrar relied on the Panel's recommendation and made the decision to refuse your application for registration as a dental hygienist in the dental care professionals register. You were notified of this decision on 15 January 2025. The letter advised you that you were not eligible for registration as a dental hygienist as you had not satisfied the Registrar that you had the requisite

knowledge and skill. The letter confirmed that the Panel had identified a number of learning outcomes as not having been covered as part of your training or professional experience to allow for registration with the Council. It confirmed that the Panel identified a list of learning outcomes not covered as part of the appellant's training or professional experience, and that the Panel had also made suggestions for the evidence that might demonstrate the learning outcomes.

Dental therapist application assessment first panel and decision

11. The Panel considered your Dental Therapist application at the same time. Similarly, the Panel did not consider the content of your training course met the standard in 'Preparing for Practice'. In addition, they did not consider the appellant's professional experience and additional training covered the shortfalls in your training. Having considered the available evidence, the Panel did not consider you had demonstrated the requisite knowledge and skill to be eligible for registration. Accordingly, they did not recommend entry onto the DCP register as a Dental Therapist.

12. On 15 January 2025, the Council wrote to you with a copy of the decision letter. In the decision letter, the Council relied on the Panel's recommendation and confirmed the decision that you were not eligible for registration because you had not satisfied the Registrar that you had the requisite knowledge and skill to practise as a Dental Therapist. The Council confirmed that the Panel identified a list of learning outcomes not covered as part of the appellant's training or professional experience, and that the Panel had also made suggestions for the evidence that might demonstrate the learning outcomes.

13. In the decision letters the Council also advised you that you could apply for a new assessment if you had new or additional information to address the above deficiencies.

Dental Hygienist second panel

14. You sought a reassessment and submitted further evidence. On 18 February 2025, the Council confirmed your application was listed for reassessment in May 2025. By further email sent on 13 March 2025, the Council notified you that the application was to be included in the April 2025 session.

15. Your applications were reassessed by a second panel on 9 April 2025. Having considered the available evidence, including the new information provided, the Panel again did not recommend entry onto the DCP register as a Dental Hygienist. The Panel again set out a list of learning outcomes not covered in the appellant's training or professional experience. Further, the Panel noted that:

"When providing a professional reference please note this must confirm clinical competency to include further information, details and examples of work experience, such as the nature of procedures that have been carried out, hours worked, number of patients seen and whether the work was supervised or unsupervised. The reference should include whether the work completed was full-time, part time or holiday work. Details and examples of work experience is required. Learning outcomes have been listed in the professional reference however, they should detail what the individual has done".

16. The Council relied on the Panel's recommendation and wrote to the appellant on 24 April 2025 with the outcome of the re-assessment. The Council's letter confirmed the decision that you were not eligible for registration as a Dental Hygienist because she had not satisfied the Registrar that you had the requisite knowledge and skill to practise.

Dental Therapist second panel

17. The same panel considered your Dental Therapist application. Having considered the available evidence, including the new information provided, the Panel also did not recommend entry onto the DCP register as a Dental Therapist.

18. The Council relied on the Panel's recommendation and wrote to you on 24 April 2025 with the outcome of the re-assessment. The Council's 24 April 2025 letter confirmed the decision that you were not eligible for registration as a Dental Therapist because you had not satisfied the Registrar that she had the requisite knowledge and skill to practise in that title. The Council identified the learning outcomes that the you had not demonstrated, along with the Panel's comments.

19. In addition to the learning outcomes set out above, each of the Council's decision letters set out your right to appeal. The Council also reminded you that you would not be able to use your degree to support any further application for registration as a DCP in the UK. Instead, you were advised you could apply to join the register as a dentist via the Overseas Registration Exam or the Licence in Dental Surgery. You were informed that this would be considered your final assessment.

Appeal

20. On 27 May 2025, you submitted two notices of appeal (NOA) – one for each decision. In each of the NOAs, you explained that you were appealing because the clinical experience evidence you provided to the Registrar was insufficient, and you understood that the GDC required a "comprehensive work experience reference which [explained] all the techniques / methods / details of each clinical works carried out." You attached an updated professional reference from Dr 1 for this purpose. You also explained that you had attached further self-reflections and CPD certificates and referred to CPD evidence attached to your original application.

21. Finally, you submitted that your education, training and experience met the requirements for registration. You requested the Committee consider the appeal with the benefit of the additional information. You indicated that you were committed to ensuring the highest standards of patient care and was eager to contribute to the Dental Therapist and Dental Hygienist professions.

The Registrar's position and submissions

22. Mr Halliday submitted that the Registrar's position, as set out in its written submissions dated 8 August 2025, is that you do not have the requisite knowledge and skill to practise as a dental hygienist and/or a dental therapist.

23. Mr Halliday submitted that the Registrar relies on the Panel's second assessment of your qualification and the information you provided. That second Panel formed the view that a number of learning outcomes had not been covered or met, and the professional references were insufficient. The Registrar maintains that you are not eligible for registration as a dental hygienist and/or a dental therapist as you have not demonstrated to the GDC that you possess the requisite knowledge and skill under section 36C(4) of the Act. Mr Halliday also highlighted that the Panel identified a number of deficiencies.

24. However, the Registrar recognised that you had recently provided further evidence with your NOA which may address the concerns raised by the Panel. The Registrar further sets out that 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

25. In your oral submissions today, you maintain that you do have the requisite knowledge and skills for registration as a dental hygienist and/or as a dental therapist. You rely on the reasons set out in your NOA. You submitted that you had child care issues which prevented you from completing further clinical experience that you had planned in India. You addressed the two references from Dr 1 which mentioned procedures you had done but stated that you feel you needed to add more of what clinical experience you have previously gained. You stated that you have done most of the procedures without supervision, as well as hands-on experience courses in the UK, especially on dental hygiene processes. You stated that you are happy to do more hands-on courses in order to keep up to date. You stated you have provided additional self-reflections as requested by the second review panel.

26. In answer to questions from Mr Halliday, the Professional Adviser and the Committee, you explained that when you were practicing in India you would always keep up to date with all dental practices. You confirmed that the last reference from Dr 1 indicates that your last working experience was between December 2023 and January 2024. You state you haven't been able to work since because of child care arrangements. You acknowledged that when you made your GDC application in 2016, your professional dental experience at that time was little over a month from December 2016 and January 2017 and three weeks in December 2017 to January 2018. Your recent experience wasn't until between December 2023 and January 2024.

27. You also outlined your understanding of the scope of practice of a dental therapist and dental hygienist and the differences between those roles. You gave the Committee examples of various procedures you have previously carried out in India regarding both roles, including treatment planning, scaling, polishing, restoration, smoking cessation, oral hygiene advice, and fissure sealants. You also gave examples of dental work where you were supervised. You stated you are happy to do more training to improve your knowledge and skills.

The Committee's decision on your appeal

28. The Committee took account of the submissions made by Mr Halliday on behalf of the Registrar and your submissions. It accepted the advice of the independent Professional Adviser and that of the independent Legal Adviser present at these proceedings.

29. The Committee considered all the evidence presented to it. This included your statement in which you set out how you have addressed each of the learning outcomes. You also have provided an updated professional reference from Dr 1. You also provided a number of CPD certificates.

30. The Committee has carefully considered your appeal. The Professional Adviser advised the Committee to consider all the documents you have submitted and your oral evidence in order to make a decision on your appeal application. She advised that to date there are a number of learning outcomes that have not been addressed.

31. The Committee considered whether you have the requisite knowledge required to be registered as a dental therapist and dental hygienist in the UK. In doing so, the Committee considered the learning outcome deficiencies identified by previous Registration Assessment Panels against your recent dental experience, together with the additional evidence.

32. The Committee is satisfied that despite the additional documentation provided by you; there are a number of learning outcomes outstanding. It notes that some of your recent CPD certificates lack specific detail and do not address all areas of concern. Also, there is a lack of evidence in respect of hands-on skills courses and learning outcomes. Some of the certificates relate to an

unrelated role and do not go directly to your skills and knowledge. The Committee notes that since your internship you have worked on three separate periods, your most recent experience was 6 weeks duration from December 2023 to January 2024. In total your dental experience over a 9-year period is 12-13 weeks. The Committee considers that this is not a sufficient period for you to demonstrate that you possess requisite skills and knowledge in respect of both roles.

33. You have provided an advanced updated reference from Dr 1 for the period of January 2024, when you last practiced. The reference does address some of the deficiencies identified in the learning outcomes for both categories, such as intra and extra oral examination, impact of medical histories on treatment provision and preventative education. However, they do not address the vast majority of concerns raised by the previous panels.

34. In addition, some of your responses to the Professional Advisor and Committee questions with regard to periodontal screening, initial assessment and monitoring and use of BPE lacked clarity. Also, when questioned on the British Society of Periodontology (BSP) Guidelines you failed to demonstrate an appropriate understanding of these. You also provided a number of reflections on these subjects but your oral evidence does not demonstrate that these were sufficiently embedded.

35. The Committee having taken into consideration all the evidence and submissions presented to it, is not persuaded that you have demonstrated that you have the requisite knowledge and skills, to be suitable for registration both as a dental therapist and a dental hygienist. The Committee having assessed your dental experience, is satisfied that a period 12-13 weeks is insufficient to demonstrate that you have the requisite skills and knowledge. The Committee was not satisfied that it received robust evidence at this appeal to demonstrate that you have now met the outstanding learning outcomes identified by the assessment panel.

36. Therefore, having had regard to all of the evidence and submissions presented to it, the Committee has decided to dismiss your appeal.

37. **Right of appeal**

38. You may appeal against this decision to the relevant court in accordance with paragraph 6 of Schedule 4A to the Act.

39. That concludes this determination.