

ON PAPERS

Registration Appeals Committee (Registration Appeal)

26 May 2026

Name: CORUGA, Adriana

Case number: CAS-212576-Q6P2C5

General Dental Council: Noranne Griffith, ILAS (not present)

Appellant: Not present and not represented.

Outcome: Appeal dismissed

Committee members: Zareen Elleby (Chair, Dental Care Professional Member)
Caroline Healy (Lay Member)
Melissa Oura (Dentist Member)

Professional Adviser Marina Harris

Legal Adviser: Angus Macpherson

Committee Secretary: Lola Bird

1. This is an appeal before the Registration Appeals Committee. The appeal is against the decision of the Registrar of the General Dental Council (GDC) that Ms Coruga is not currently eligible for registration as a Dental Therapist and/or Dental Hygienist.
2. The appeal is being held in accordance with the terms of the *General Dental Council (Registration Appeals) Rules Order of Council 2006*, ('the Registration Appeal Rules'), pursuant to Schedule 4A of the *Dentists Act 1984* (as amended) ('the Dentists Act').
3. The proceedings are being conducted remotely by Microsoft Teams video-link.

Decision to conduct the appeal in the absence of the appellant and on the papers

4. Neither party is present today, following a request made by Ms Coruga for her appeal to be considered on the papers in the absence of both parties.
5. In considering the issues of service and whether to proceed to consider Ms Coruga's appeal on the papers without her or a representative for the Registrar being present, the Committee accepted the advice of the independent Legal Adviser present at these proceedings. The Legal Adviser drew the Committee's attention to the relevant Rules and factors to be considered.
6. The Committee had regard to Rule 4(3) of the Registration Appeal Rules states that:

The Committee may determine the appeal without a hearing if—

- (a) the appellant has not, within the period specified in paragraph (1)(a), requested that a hearing be held;*
- (b) the registrar agrees that the appeal may be determined without a hearing;*
and
- (c) the Committee consider it to be desirable to determine the appeal without a hearing*

7. The Committee also had regard to Rule 5(2), which provides that:

Where the appeal is to be determined without a hearing in accordance with rule 4(3), the Hearings Director shall fix a date for the meeting at which the appeal is to be determined, and shall send notification to the parties of the date of the meeting.

8. The Committee considered that Ms Coruga’s request for an on the papers meeting was clear. It noted that her appeal was originally scheduled to take place in March 2026, and that she had requested an on the papers meeting in respect of that listing. Ms Coruga repeated her request in respect of today’s proceedings, stating in an email dated 23 April 2026 to the Dental Professionals Hearings Service, *“I can confirm that I agree to my appeal being listed on 26 May and considered on the papers”*.

9. The Committee was satisfied that, in accordance with Rule 5(2), notification of today’s meeting was sent to Ms Coruga on 24 April 2026 by Recorded Delivery and by secure email. The Committee also noted that the bundle of documents that it would be considering was sent to Ms Coruga by Recorded Delivery and secure email on 11 May 2026. Further, that Ms Coruga responded and provided additional material for consideration by the Committee today.

10. In all the circumstances, the Committee was satisfied that it was desirable to determine Ms Coruga’s appeal by way of a meeting in the absence of both parties and on the papers.

Background and Legal Framework

11. The Committee had regard to the background to Ms Coruga’s appeal and applicable legal framework, as set out in a case summary provided by the GDC.

12. Ms Coruga is currently registered with the GDC as a Dental Nurse. She submitted two applications for registration with the GDC, both dated 3 March 2023. One of the applications was for registration as a Dental Therapist, and the other for registration as a Dental Hygienist. In making her applications, Ms Coruga relied on her *“International Master’s”* qualification entitled, *“The role dental therapy and competences of the dental hygienist in the medical and dental office”* obtained in Italy in 2022.

13. The relevant legal framework in place at the time Ms Coruga’s applications were received by the GDC was set out under Section 36C of the Dentists Act. Sections 36C(1), (2) and (4) to (6) stated as follows:

(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) of matter A or C, and

(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)
- (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 [they have] the necessary knowledge of English;*
 - (b) that [they are] of good character; and*
 - (c) that [they are] in good health, both physically and mentally.*

14. Ms Coruga made her applications under Matters C and D above. However, the only matter under consideration at this appeal is whether she has the requisite knowledge and skill to be registered as a Dental Therapist and/or Dental Hygienist in accordance with Matter C.

Requisite knowledge and skill

15. Under the applicable legal framework, when determining whether an applicant has the requisite knowledge and skill, the GDC was required under section 36C(5)(a) of the Dentists Act to take into account all Ms Coruga's relevant qualifications, and all her relevant knowledge or experience, wherever acquired.

The first assessment panel outcome

16. On 9 April 2025, three assessors formed a Registration Assessment Panel ('the first assessment panel') and considered Ms Coruga's applications for registration.

17. Having assessed both applications, the first assessment panel did not recommend Ms Coruga's entry onto the DCP Register as a Dental Therapist or as a Dental Hygienist. That panel was not satisfied that the evidence Ms Coruga had provided demonstrated that she had the requisite knowledge and skill to be eligible for registration under either title.

18. In relation to both Ms Coruga's applications, the first assessment panel was of the view that there were deficiencies in respect of her qualification against a number of the learning outcomes relevant to the practice of a Dental Therapist and a Dental Hygienist. The first assessment panel required a letter from the dean of the training institute Ms Coruga attended answering a number of queries and providing information in respect of her qualification. The first assessment panel also sought a recent professional reference to cover a number of the learning outcomes identified as deficient.

19. The Registrar relied on the first assessment panel's decisions in respect of Ms Coruga's applications, and the GDC wrote to her by way of separate letters, both dated 23 April 2025, which explained the outcomes of the assessments. Ms Coruga was informed that the first assessment panel had identified that a number of learning outcomes, relevant to the practice of a Dental Therapist and a Dental Hygienist, had not been covered as part of her training or professional experience. The relevant learning outcomes were set out in detail in the respective letters of 23 April 2025 along with the evidence required by Ms Coruga to address the identified deficiencies.

20. Ms Coruga was advised in the letters of 23 April 2025 that, should she have any new or additional information which would address the deficiencies identified by the first assessment panel, she could submit the additional information to the GDC by 21 May 2025 for reassessment of her applications. Ms Coruga was further advised of her right to appeal the refusal decisions.

The second assessment panel outcome

21. Ms Coruga did provide additional information to the GDC, and her updated applications were reassessed on 16 July 2025 by three assessors who formed a Registration Assessment Panel (the second assessment panel).

22. The second assessment panel, having taken into account the additional material provided by Ms Coruga, decided that she had not demonstrated the requisite knowledge and skill to be eligible for registration as a Dental Therapist or a Dental Hygienist with the

GDC. Therefore, the second assessment panel recommended that Ms Coruga be refused registration under both titles.

23. In summary, the matters raised by the second assessment panel were:

- a lack of detail on how Ms Coruga’s clinical experience and competencies were collected and assessed during her programme of study/training;
- the information provided to date did not appear to be equivalent to a UK education provider; and
- in relation to Ms Coruga’s certificate of good standing, the following was noted:

“Although you have provided a Certificate of Good Standing, this has been issued and submitted by the training institute, however, we are unable to determine whether this qualification has and will allow you to practice as a dental hygienist and/or dental therapist in Romania and/or Italy”.

24. The Registrar relied on the second assessment panel’s decisions in respect of Ms Coruga’s updated applications, and the GDC wrote to her by way of a letter dated 18 July 2025, which explained the outcomes of the assessments. The reasons for the second assessment panel’s decisions were set out in detail in the letter, highlighting the various questions that had not been answered in relation to Ms Coruga’s primary qualification and where supporting evidence was lacking. Ms Coruga was again advised of her right to appeal the refusal decisions.

Ms Coruga’s appeal

25. On 16 August 2025, the GDC received Ms Coruga’s Notice of Appeal (NOA) in which she confirmed that she wished to appeal the Registrar’s decision to refuse her applications for registration as a Dental Therapist and Dental Hygienist. Ms Coruga provided the following documents with her NOA:

- her internship notebook
- her logbook
- Convention between the Università Degli Studi Di Bari Aldo Moro and APISA, and
- Romanian College of Physicians press release

26. In her NOA, Ms Coruga set out her grounds of appeal which, in summary, are that:

- She believes her training and experience meet the required standards for registration and that she is committed to providing any additional evidence required.
- She holds a qualification granted by an institution outside the UK that is directly relevant to the profession and she has acquired the requisite knowledge and skill to practise safely and effectively as a Dental Therapist and Dental Hygienist, as demonstrated by the detailed syllabus for her course, clinical training and competences achieved. She stated that graduates from the same programme and year were already registered and practising in the UK.
- She outlined evidence relating to her syllabus that she had already submitted to the GDC.
- That she had invested significant time, effort and financial resources into completing her training and wanted the chance to apply her skills.
- She requested that her appeal be considered in the light of forthcoming evidence.

27. The forthcoming material referred to by Ms Coruga in her NOA was submitted to the Dental Professionals Hearings Service by email on 25 April 2026 and is before this Committee today in the form of a number of additional documents. The additional documents comprised:

- Ms Coruga's 'Response to GDC Decision'
- Annex 1 – Clinical Logbook
- Annex 2 – Clinical Case Example
- Annex 3 – Clinical Training Contract (including explanation and original document)
- Annex 4 – Italian Recognition Letter (including translation and original document).

The Registrar's position

28. In its case summary of 11 March 2026, the GDC sets out the position of the Registrar, including the following:

“...The additional information provided with the NOA, and any further documentary evidence provided by the Appellant is a consideration for the Committee, who may assess this information to determine whether the Appellant is entitled to be registered.”

The Committee may also take into account all of the documentation contained in the Registration Appeal Bundle along with any advice given by the Professional Adviser.

It should be noted that although the matter before this Committee concerns the Appellant's qualification / knowledge and skill, in order to grant registration, the Registrar must also be satisfied of the Appellant's identity, that they have the necessary knowledge of English, that they are of good character and that they are in good health. These matters have already been the subject of assessment as the Appellant is a registered dental nurse. Therefore, if the Committee take the view that Matter C is satisfied, the matter does not need to be remitted back to the Council for further consideration of Matter D".

The Committee's decision on the appeal

29. The Committee considered all the evidence before it. It took into account that it had further evidence before it today, including that which was provided by Ms Coruga in her email of 25 April 2026. That additional material was not before the second assessment panel.

30. The Committee took account of Ms Coruga's cover letter to her NOA dated 16 August 2025, in which she set out her reasons for her appeal. The Committee also considered Ms Coruga's most recent written response to the Registrar's refusal decision, in which she specifically addresses the deficiencies identified in the refusal letter of 18 July 2025. The Committee further had regard to the Registrar's position, as contained in the GDC's case summary.

31. The Committee accepted the advice of the independent Professional Adviser present at this meeting today. The Professional Adviser, having considered the additional material provided, advised the Committee that Ms Coruga's programme of study for her primary qualification in Italy appeared to be similar to how dental hygiene and therapy students study and qualify in the UK.

32. The Committee also accepted the advice of the independent Legal Adviser, who confirmed that the correct legal framework in respect of this appeal is as set out in the GDC's case summary, including the Committee's powers of disposal.

33. The Committee bore in mind that the burden was on Ms Coruga to satisfy it that she has 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 overarching statutory objective of the GDC and its task in assessing whether Ms Coruga would be a safe and competent practitioner under either of the relevant titles.

34. The Committee had regard to the refusal letter of 18 July 2025, which was sent to Ms Coruga following the outcome of the second assessment panel. The Committee considered individually the areas of deficiencies that were identified in relation to Ms Coruga's applications for registration as a Dental Therapist and Dental Hygienist. These were set out as follows in the letter of 18 July 2025, in the form of questions and requests for information that the second assessment panel concluded Ms Coruga had not satisfied:

A. For each of the clinical learning outcomes can you provide clarification what clinical competencies are assessed. Also, could you provide details of how clinical experience and competencies are collected and assessed.

35. The Committee considered that Ms Coruga had satisfied this requirement detailed at A with the additional evidence she provided. The Committee had regard to the clinical logbook in relation to her undergraduate programme of study, which related to her treatment, under observation, of 98 patients. The Committee noted that Ms Coruga explains in her written response to the GDC's refusal decision that *"Clinical competencies were formally assessed through structured clinical evaluation, including direct supervision, observed performance, and documented supervisor sign-off for each clinical activity. Each procedure recorded in the clinical logbook includes diagnosis, treatment performed, and supervisor validation"*. The Committee also noted and accepted the advice of the Professional Adviser regarding the similarity to a UK programme of study.

36. The Committee considered that Ms Coruga's clinical logbook evidenced that her clinical experience during her programme of study involved a good number of patients, with a range of treatments undertaken that are relevant to the scope of practice of a Dental Hygienist. This included routine scaling, deep scaling and root surface debridement. However, the Committee noted that there is limited evidence in the clinical logbook to Ms Coruga's experience of administering local analgesia, which was of some concern, given that this is a key element in the practice of a Dental Hygienist.

37. The Committee also noted that the clinical logbook provided by Ms Coruga did not cover, as extensively, those elements of practice relevant to a Dental Therapist. Ms Coruga's clinical experience in this regard appeared to cover only four procedures, which included two restorations, one extraction and one pulpotomy which was simulated.

B. Can you provide an example of the clinical logbook and course handbook.

38. The Committee considered that this question at B had been satisfied by Ms Coruga's provision of her clinical logbook referred to at A above.

C. Provide details of the pre-clinical skills course prior to seeing patients, including the number of procedures, pre-clinical assessments and information about where the preclinical programme is delivered.

39. The Committee considered from the additional material Ms Coruga provided in respect of her programme of study that this question at C had been addressed. The Committee was satisfied from the evidence that Ms Coruga's programme of study, included pre-clinical training on phantom heads, the use of simulation models, as well as supervised patient care under the direct observation of tutors.

D. What is the level of clinical supervision during the clinical training and are students assessed independently.

40. The Committee was satisfied on the basis of the additional evidence provided by Ms Coruga that she was assessed independently during her clinical training, having been directly observed and with her clinical logbook signed off by her tutors.

F. Is the programme quality assured in a similar way to the University of Bari Aldo Moro's dental hygiene programme.

41. The Committee had before it an Italian Recognition Letter and its translation provided by Ms Coruga, which confirmed that with her qualification, she would be suitable for registration in Italy as a Dental Hygienist.

G. Is this qualification equivalent to your own dental hygienist and therapist qualification. If not, please explain how it differs.

42. The Committee noted that there is evidence before it of Ms Coruga's clinical training during her programme of study in areas relevant to the scope of practice of a Dental Hygienist. The Committee was not satisfied that Ms Coruga's training during her programme of study in areas relevant to the scope of practice of a Dental Therapist carried the same status.

H. How is the academic component of the programme delivered and assessed? Is the programme's academic component delivered online only? If delivered online, is this accessed live or by materials which can be accessed anytime and how is the accessing of the materials mentioned?

43. The Committee was content that a blended learning approach was adopted, incorporating online training and in person supervision, such as was demonstrated by Ms Coruga's clinical logbook. Ms Coruga has provided evidence in respect of undertaking clinical procedures within the scope of a Dental Hygienist. However, as previously stated there is limited evidence in relation to the assessment of Ms Coruga's practice when undertaking the clinical procedures within the scope of a Dental Therapist. In this regard, the Committee noted that Ms Coruga had previously provided a number of Professional

Work References covering the period of her clinical training, which refer extensively to work she had undertaken, including clinical procedures such as pulpotomies, extractions, and the placing of pre-formed crowns. However, the Committee found a lack of evidence to indicate when and how Ms Coruga had been assessed in these areas as part of her training and qualification.

I. With this qualification, would the student be able to practice in Italy and Romania as a dental hygienist and/or dental therapist.

44. The Committee considered that the Italian Recognition letter is clear that Ms Coruga could practice in Italy as a Dental Hygienist. However, the letter does not address being able to practise as a Dental Therapist. The Committee noted that certain countries, which may include Italy and Romania, do not have the Dental Therapist role.

J. Does this qualification alone, allow a student to qualify as a dental hygienist and/or therapist or would they require an additional qualification.

45. This Committee considered that this point at J is addressed by the Italian Recognition Letter, as detailed above in respect of I

K. What is are the entrance requirements for this programme, is it similar to the University of Bari Aldo Moro's dental hygiene programme.

46. This question at K appeared to the Committee to relate to Ms Coruga's postgraduate studies. It noted that in her written response to the GDC's refusal decision she states that "*The programme represents structured postgraduate clinical training building upon prior dental education and experience*". The Committee considered that Ms Coruga's explanation did not provide much additional information in response to this question.

47. It was the view of the Committee, having considered the individual deficiencies identified by the second assessment panel, that there remains a relatively limited amount of evidence in relation to Ms Coruga's actual recent clinical experience.

48. Whilst the Committee took into account that she has demonstrated that she undertook a range of clinical work relevant to the practice of a Dental Hygienist during her training, the Committee was concerned about the lack of evidence relating to the use of local analgesia. The Committee also took into account that this was experience that Ms Coruga gained as part of her qualification, which she obtained in 2022, some four years ago. The Committee noted that all of Ms Coruga's Professional Work References, save for the reference in relation to her work as a Dental Nurse in the UK, relate to that period of clinical training during qualification. There is no evidence that Ms Coruga has worked either in Italy or Romania as a Dental Hygienist or Dental Therapist since qualifying in Italy in 2022.

49. The Committee noted that as part of the additional material provided, Ms Coruga supplied evidence of a voluntary clinical contract that she held from June to November 2025. The information relating to that contract sets out clinical responsibilities relevant to the work of a Dental Hygienist. However, no other information has been provided in relation to the contract, such as the number of patients seen or any supporting references.

50. The Committee noted from the Professional Work Reference in respect of her work in the UK, that Ms Coruga is highly regarded as a Dental Nurse. It also took into account the evidence showing that she has completed a significant amount of relevant Continuing Professional Development (CPD). However, the Committee considered that the standard and extent of Ms Coruga's clinical training and the lack of evidence of recent practice does not demonstrate that she has the requisite knowledge and skill to practise in the UK as a Dental Therapist or a Dental Hygienist. In reaching its decision, the Committee bore in mind its duty to protect the public and the wider public interest in accordance with the GDC's overarching statutory objective.

51. In all the circumstances the Committee determined, under paragraph 4(8)(a) of Schedule 4A to the Dentists Act, to dismiss Ms Coruga's appeal.

52. That concludes this determination.