

PUBLIC HEARING

Registrations Appeal Committee Registrations Appeal

8 May 2026

Name: THANGELLA, Saraswati

Case number: CAS-212983-M1B4M2

General Dental Council: Rebecca Vanstone, Counsel
Instructed by Lauren Francis, ILAS

Appellant: Present
Represented by Revd Dcn Joice James Pallickamyalil

Outcome: Appeal Dismissed

Committee members: Andrea Hammond (Chair and Dental Care Professional
Member)
Nicola Jordan (Dentist Member)
Konrad Chrzanowski (Lay Member)

Legal adviser: Alice Moller

Professional Adviser: Marina Harris

Committee Secretary: Kate Anderson

Ms Thangella,

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 your application for entry to the register as a Dental Therapist.
2. You were present at the hearing and represented by Revd Dcn Joice James Pallickamyilil. Rebecca Vanstone, Counsel, appeared on behalf of the General Dental Council (GDC).
3. The hearing was held remotely on Microsoft Teams.

Legal framework and background

4. Section 36C of the Dentists Act 1984 (as amended) ("the Act") sets out the requirements for qualification for registration in the dental care professionals register. Sections 36C(1)-(2) and (4)-(6) states the following:
 - (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) *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).*
- (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.*
5. Ms Thangella's application for registration is made under Matter C and D.
6. Ms Thangella is relying on her bachelor of dental surgery obtained in India in 2021.
7. The matter under consideration in this appeal is whether Ms Thangella possesses the requisite knowledge and skill to practise as a dental therapist by virtue of this qualification, granted by an institution outside the United Kingdom.
8. When determining whether an applicant has the requisite knowledge and skill, the Council is required under section 36C(5)(a) of the Act to take into account all the applicant's relevant qualifications, and all relevant knowledge or experience, wherever acquired. The Council does have the power to require an applicant to perform a test or assessment, however the Committee should note that the Council does not currently ask applicants to undertake a test or an assessment.
9. 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.

10. On 06 March 2023, the General Dental Council (“the Council”) an application from Ms Thangella applying to register as a Dental Care Professional under the title Dental Therapist. It is acknowledged in the bundle the date received is listed as 6 March 2024, this is incorrect. A caseworker on behalf of the Council confirmed the date of receipt as 06 March 2023.

11. Between 17 July 2024 and 17 September 2024, there was various correspondence between the Council and Ms Thangella. The Committee will note that the emails request additional information to support Ms Thangella’s application. Unfortunately, due to staffing changes in the International Registration team, copies of further correspondence are not available. However, a caseworker on behalf of the Council has confirmed all documentation received with Ms Thangella’s application is included in the completed application.

First Panel Assessment of application

12. Three assessors formed a Registration Assessment Panel (“Panel”) in January 2025 and conducted an assessment of Ms Thangella’s application.

13. On the basis of the information provided by Ms Thangella, the Panel was not satisfied that the content of the training course which led to the award of her qualification met the standard in preparing to practice. Further, having taken into account the information provided by Ms Thangella about her professional experience and any additional training undertaken, the Panel were not satisfied that this experience covered the shortfalls identified

14. Having considered Ms Thangella’s qualifications, knowledge and experience wherever acquired, the Panel did not consider that she had demonstrated the requisite knowledge and skill to be eligible for registration as a Dental Therapist. On this basis, the Panel did not recommend Ms Thangella’s entry onto the register.

15. The Registrar relied on the Panel’s recommendation and wrote to Ms Thangella providing the outcome of her application. Ms Thangella was refused registration under the title Dental Therapist as a high number of learning outcomes had not been met.

Correspondence

16. The letter advised that should Ms Thangella have any new or additional information which would address the deficiencies identified by the Panel, she could submit these documents within one month (20 working days) of the date of the letter
17. On 01 February 2025, the Council received an email from Ms Thangella to be considered as additional information to support her application.
18. On 11 February 2025, the Council received a professional reference for Ms Thangella in support of her application. On the same date, the Council confirmed receipt.
19. On 11 February 2025, the Council received an email from Ms Thangella. The email clarified the dates of her practice experience and requested information to support her professional reference. On the same date, the Council emailed Ms Thangella thanking her for the update.
20. On 14 February 2025, the Council received a second professional reference in support of Ms Thangella's application.
21. On 28 April 2025, the Council contacted Ms Thangella with details of her new caseworker.
22. Between 28 April 2025 and 25 June 2025, there was correspondence between the Council and Ms Thangella in respect of timeframes in which Ms Thangella's reassessment application would be considered.
23. On 03 July 2025, the caseworker on behalf of the Council emailed Ms Thangella and confirmed that her reassessment would take place in August 2025.
24. On 28 August 2025, the Council received an email from Ms Thangella querying the status of her application, and that the delay in processing her application had '*a substantial impact on [her] professional development and professional wellbeing*'.
25. On 29 August 2025, the Council received a further email from Ms Thangella. The email raised concern that Ms Thangella had not received a response to her application and that the delay was having a negative impact on her mental health. Ms Thangella requested an update on the status of her application.
26. On 29 August 2025, the caseworker on behalf of the Council emailed Ms Thangella. The email stated that the caseworker was '*in the process of writing up decision letters from the panel*'. The email thanked Ms Thangella for her patience.

27. On the same date, the Council received a further email from Ms Thangella. The email stated:

'My concern regarding extended delay in my registration process. It has been over two and a half years since I initiated my application, and I am finding it increasingly difficult to remain patient without a clear understanding of the timeline'.

Reassessment of application by second Panel

28. Three assessors formed a Registration Assessment Panel ("Panel") in August 2025 and conducted an assessment of Ms Thangella's reassessment application.

29. Taking into account Ms Thangella's qualification, professional experience and additional training, the Panel considered that she did not demonstrate the requisite knowledge and skill to be eligible for registration as a Dental Therapist with the Council. Therefore, the Panel recommended that Ms Thangella be refused registration.

30. The Registrar relied on the Panel recommendations and made the decision to refuse Ms Thangella's application for registration as a Dental Therapist. The Council wrote to Ms Thangella via email on 29 August 2025 to notify her that her application for registration with the Council under the title Dental Therapist had been refused.

31. Ms Thangella was informed she was not eligible for registration under the title Dental Therapist as she had not satisfied the Registrar that she had the requisite knowledge and skill. She was informed of the learning outcomes that appeared not to have been covered as part of her training or professional experience.

32. The outcome letter informed Ms Thangella that due to the route closure, the Council would not be able to progress her application any further because she did not hold any relevant overseas qualifications for registration as a dental care professional.

33. Further, Ms Thangella was notified that the decision not to register a person's name in the Dental Care Professionals register is an appealable registration decision under Section 36J and Schedule 4A of the Act.

Notice of Appeal

34. On 30 September 2025, the Council received a Notice of Appeal ("NOA") from Ms Thangella. Ms Thangella did not provide any supporting evidence with the NOA.

35. Ms Thangella stated that she wished to appeal the decision to refuse her application under the title Dental Therapist on the following basis:

- The professional work references submitted had been overlooked.
- The clinical competencies had already been assessed during her internship.
- The self-reflection requirements are unfair.

Evidence

36. The Committee was provided with a number of additional documents alongside your original application documents, including the GDC's case summary, certification of your qualifications, CPD certification, professional work references, and your self-reflections.

37. You gave oral evidence under oath and provided details regarding your training and your experience working as a dentist in India. You also gave evidence on your knowledge relevant to the role of Dental Therapist in the UK, and your understanding of the role for which you are appealing the registration refusal.

Today's Hearing

Initial Submissions on behalf of the Registrar

38. Ms Vanstone referred the Committee to the background of your case, as set out in the case summary provided to it before the hearing. She submitted that today's Committee must consider the matter afresh. She submitted that the Committee must be satisfied that you do not pose a risk to the public and that you have not de-skilled in the time during which you had not practised in a clinical capacity.

39. Ms Vanstone submitted that should the Committee be satisfied as to matter C, the case will need to be remitted back to the Registrar for matter D as the time limit for which documents must be provided had now expired.

Initial Submissions on your behalf

40. Revd Dcn Joice James provided initial submissions on your behalf, in which he submitted that your application for registration as a Dental Therapist had been declined for two reasons- these being no recent clinical competency and having not provided sufficient self-reflections.

41. Revd Dcn Joice James submitted that at the time you initially applied for registration as a Dental Therapist, there was no clear written requirement as to how recent the clinical competency had to be. He submitted however, that you have spent the past

6 months working as Dentist in India and that a professional reference has been provided from this experience that details your current clinical competency.

42. In relation to the self-reflections, Revd Dcn Joice James submitted that when asked to provide these, you misunderstood the instruction that these must be a maximum of 200 words and thought that you would be penalised for providing more. He submitted however that you have now provided further reflections which contain more detail, and refer to your clinical experience as necessary.

Your Oral Evidence

43. In your oral evidence you answered questions from Rev Dcn Joice James. These questions related to the learning outcomes that had been identified by the previous assessment panels as areas in which they assessed that you did not demonstrate the requisite knowledge and skill to be registered as a Dental Therapist in the UK.
44. You detailed the training that you had carried out for your degree in dentistry in India. You told the Committee that this was a 5 year degree, and that you completed an internship year in Mumbai for one year after graduating. You told the Committee that you had undertaken a one year Masters degree in the UK before working as a trainee Dental Nurse in the UK for a year and a half. You provided the Committee with details of the work you have undertaken in your recent 6 months of employment as a Dentist in India. Whilst working in India, you also undertook a 2 month hands on CPD course.
45. While answering questions, you detailed your experience from university and your recent experience in India including the procedures and treatments you have carried out, the instruments you have used, your patient management, your radiographic experience, the use of anaesthesia, and your experience of both surgical and non-surgical treatments.
46. You further answered a number of questions from the independent Professional Adviser present at these proceedings. You were asked about your recent employment as a Dentist in India, including how many patients you saw per day and specifically about your experience in periodontal treatment whilst in this employment. You answered questions on the charting and scoring of teeth, and the treatments and instruments that you used in treating periodontal issues. The Professional Adviser asked you about the scope of practice of a Dental Therapist in the UK. The Professional Adviser asked you questions about you work as a Dental Nurse in the UK, to which you clarified what you had learnt in this role, your training and experience, and that you had observed a Dental Hygienist whilst in this role.
47. Ms Vanstone asked some further questions of clarification in relation to the length of appointments in your work in India and the number of patients you would see. You

answered these, and also answered further questions in relation to your understanding of scoring BPE and how you would treat each code, when you would do 6 point pocket charting, and your understanding of direct access in the UK. Ms Vanstone lastly asked you about the timeline of your roles and experiences, and you clarified that you had qualified as a Dentist in 2022, undertaken a year long Masters degree, worked as a Dental Nurse for a year and a half and then returned to India to work as a Dentist.

48. In addition to the questions put to you by the Professional Adviser and the GDC, you answered a number of questions from the Committee. You answered questions relating to the timings of your dental appointments in India and the timings of your 2 month course which you undertook alongside your 6 months work in India. You also answered further questions in relation to periodontal treatment such as how you would classify periodontal disease in accordance with the grading system and what a 6 point pocket chart is.

49. Finally, you answered some further questions that Revd Dcn Joice James asked you, regarding the hands-on course you had undertaken and whether this was on people or models. You also answered questions on the process of dentistry in India which differs from the UK and how patients would be treated by whoever was least busy rather than there being a structured system. Lastly, you answered Revd Dcn Joice James' question on what 6 point pocket charting is.

Closing Submissions made by the parties

50. Following your oral evidence, the Committee heard closing submissions from both parties.

51. Ms Vanstone submitted that the burden was on you to satisfy the Committee that you have the requisite knowledge and skill to register as a Dental Therapist. She submitted that it was a matter for the Committee to decide whether the additional information before it today, including your oral evidence, satisfies it that you have the requisite Knowledge and Skill.

52. Ms Vanstone submitted that even if the Committee find that you have the requisite knowledge and skill, the information that is required at Matter D is now out of date and therefore the matter would need to be remitted back to the registrar.

53. Revd Dcn Joice James submitted that you have provided a lot of information that show you have the clinical competencies that were assessed as deficient by the previous Assessment Panels. This includes the CPD provided, including the most recent hands on CPD 2 month course completed in India as well as the detailed self-reflections you have provided.

54. Revd Dcn Joice James submitted that you answered many questions at this hearing, and that you had answered these correctly. He therefore submitted that you had now done enough to be registered as a Dental Therapist.

Committee's Consideration and Decision

55. The Committee has taken into account all the evidence provided to it, both documentary and oral. It took account of the submissions made by both parties.

56. The Committee accepted the advice of the independent Professional Adviser, who confirmed that you had given a detailed overview of your experience and skills and that it was clear you have a lot of current experience from working as a Dentist in India from the references provided and your oral evidence. The Professional Adviser advised that you had answered questions on patient management well, and as expected of a UK registrant. The Professional Adviser said that it was clear that you had a desire to continue learning. The Professional Adviser advised that whilst your dental experience was sufficient to cover the restorative role of a Dental Therapist in the UK, it did not appear that you had much experience in the dental hygiene aspect of a Dental Therapist role. She advised that you had provided inaccurate answers on staging and grading, and that there was a weakness in your experience of periodontal therapy which is currently a major part of a Dental Therapy role in the UK. The Professional Adviser however reminded the Committee that it was its decision to assess the information before it and make a decision on whether you have the requisite knowledge and skill to be registered as a Dental Therapist.

57. The Committee also accepted the advice of the Legal Adviser, who confirmed that the correct legal framework in respect of this appeal is as set out in the GDC's case summary of 12 February 2026.

58. 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. The Committee also remained mindful of the overarching statutory objective of the GDC and its task in assessing whether you would be a safe and competent practitioner under the relevant title.

59. The Committee considered that in terms of documentary evidence, it appeared that you had provided all of the information as requested to prove that you have the requisite knowledge and skill. It noted the detailed self-reflections and CPD provided since the previous Assessment Panel. However, having heard oral evidence, the Committee was not satisfied that you had the knowledge and skill required of a Dental Therapist from your answers. It noted that you had to be prompted within questions relating to periodontal treatment and did not answer sufficiently, and that you were

asked multiple times about 6 point pocket charting, but that you did not appear to fully understand this element of treatment. The Committee was concerned that you did not understand basic elements of the periodontal work undertaken by a Dental Therapist. It bore in mind that it was considering whether you could safely treat members of the public in this role with your current knowledge and skill. The Committee considered therefore that while you had answered questions well in terms of dentistry, your lack of knowledge in periodontal treatment did not satisfy it that you had the requisite knowledge and skill to safely practise under the title of Dental Therapist.

60. Having taken into consideration all the evidence and written submissions presented to it, the Committee is not persuaded that you have demonstrated that you have the requisite knowledge and skill to be suitable for registration as a Dental Therapist. The Committee was not satisfied that it had received further evidence at this appeal to demonstrate that you have now met the outstanding learning outcomes identified by the Assessment Panels.

61. Therefore, the Committee has decided to dismiss your appeal.

Right of appeal

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

63. That concludes this determination.