

**On Papers  
Registrations Appeal Committee  
Registrations Appeal Hearing**

**6 March 2026**

**Name:** CHOUDHRY, Jamil Ahmed

**Case number:** CAS-212461-K0W4B9

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**General Dental Council:** Not Present  
Megan Wolliner, IHLPS

**Appellant:** Not Present  
Unrepresented

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**Outcome:** Appeal dismissed

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**Committee members:** Anne Ng (Chair and Dental Care Professional Member)  
Sophie Wilson (Dentist Member)  
Jane Jones (Lay Member)

**Legal adviser:** Paul Kilcoyne

**Professional Adviser:** Malcolm Smith

**Committee Secretary:** Kate Anderson

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1. This Registrations Appeal Committee (RAC) 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 was to consider Mr Choudhry's appeal against the decision taken by the GDC's Registrar to refuse his application for entry to the register as a Dental Therapist.
2. Mr Choudhry was not present at the hearing and was not represented.
3. The hearing was held remotely on Microsoft Teams.

### Decision on Service

4. The Committee considered whether notice of the convening of this hearing had been issued to Mr Choudhry under Rule 5 of the General Dental Council (Registration Appeals) Rules Order of Council 2006 (the Rules).
5. The Committee received from the GDC an indexed hearing bundle which contained a copy of the Convening Notice, dated 17 December 2025 ('the notice'). The hearing bundle also contained a scan of the letter confirming that the notice was sent to Mr Choudhry's registered address by Recorded Delivery on 17 December 2025. A copy of the notice was also emailed to Mr Choudhry on 17 December 2025.
6. The Committee was satisfied that the notice contained proper notification of this hearing, including the relevant dates, confirmation that the hearing would be held remotely, as well as confirmation that a Professional Adviser would be in attendance.
7. On the basis of all the information provided, the Committee was satisfied that notice of the hearing had been served on Mr Choudhry in accordance with the Rules. The Committee was also satisfied that the period of notice given was in line with the Rules.

### Decision on Proceeding on the Papers

8. The Committee next considered whether to exercise its discretion under Rule 4(3) and Rule 11 to determine the appeal on the papers in the absence of Mr Choudhry, and any representative for either party. It approached this issue with the utmost care and caution.
9. The Committee noted the correspondence between Mr Choudhry and the GDC between 7 November and 10 December 2025 in which Mr Choudhry requested a hearing to be held on the papers. The GDC confirmed in this correspondence that he would be foregoing the chance to answer questions from a Professional Adviser,

that the hearing would be remote so would be of little inconvenience to him. It also confirmed that the Committee would have the right to postpone the hearing if they decided that an oral hearing would be more appropriate. In an email dated 10 December 2025, Mr Choudhry stated that, 'Pertaining to the hearing for appeal I would like to be that on paper appeal only.' In these circumstances, the Committee was satisfied that Mr Choudhry had voluntarily absented himself from today's hearing. The Committee further considered that adjourning the hearing would not serve any useful purpose as there was no clear indication from Mr Choudhry that he would attend any future hearing. Accordingly, the Committee was satisfied that it was fair to proceed with the hearing in the absence of Mr Choudhry and on the papers.

### Legal framework and background

10. 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 16 February 2026.
11. On 7 March 2023, the GDC received an application for registration as a Dental Therapist from Mr Choudhry. In making his application, he relied on his Bachelor of Dental Surgery (BDS) obtained in Pakistan, on 20 June 2017.
12. It is noted in the GDC's case summary that there has been a change in the law since 8 March 2023, in relation to how applicants with overseas diplomas in dentistry can join the DCP Register. Prior to 8 March 2023, an applicant who held an overseas diploma in dentistry was able to apply to join the DCP Register. However, applicants can no longer rely on diplomas in dentistry, and must now hold a relevant DCP qualification in order to join the DCP Register.
13. As Mr Choudhry's application was received by the GDC on 7 March 2023, which was a day before the change in legislation, it was processed in accordance with the legislative framework in place at that time. Therefore, in setting out the law in this case, the GDC has referred to the relevant parts of the Act that were in force at the time his application was received.
14. Accordingly, it is noted that his application for registration was made under Section 36C of the Act. Sections 36C(1) to (2) and (4) to (6) of the Act, as they were at the material time, 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) *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.*

15. The only matter under consideration at this appeal is whether Mr Choudhry possesses the requisite knowledge and skill to practise as a Dental Therapist by virtue of his Bachelor of Dental Surgery BDS qualification (granted by an institution outside of the United Kingdom), his knowledge, and his experience. This is in accordance with matter C.

16. Three assessors formed a Registrant Assessment Panel ('the Panel') on 8 July 2025 and conducted an assessment of Mr Choudhry's application. Having considered Mr Choudhry's application, the Panel considered that Mr Choudhry did not demonstrate that he possessed the requisite knowledge and skill to be eligible for registration as a Dental Therapist. This Panel considered Mr Choudhry's knowledge and skill was deficient in a wide range of areas across his primary dental qualification, knowledge and experience.
17. The Registrar relied on the Panel's recommendation and sent an email Mr Choudhry on 17 July 2025, attaching the outcome letter, dated 16 July 2025, to notify him that his application for registration with the Council had been refused.
18. The letter advised that should Mr Choudhry have any new or additional information which would address the deficiencies identified the Panel, he should submit these documents for re-assessment of his application. The letter stated that any additional information must be sent by 17 August 2025. Mr Choudhry was advised of his right to appeal this decision, and if he intended to do so, to submit his appeal by 19 August 2025.

### Notice of Appeal

19. On 14 August 2025, the Council received a Notice of Appeal ('NOA') in respect of Mr Choudhry's Dental Therapist application.
20. In the NOA Mr Choudhry states that he is appealing against the decision from 16 July 2025. Mr Choudhry's basis for the appeal is that he believes that he has submitted all the selected documents and CPD certificates to meet the criteria and fulfilled the requirements mentioned in the learning outcomes sections.
21. Within Mr Choudhry's NOA he states the following, "*My commitment to upholding the standards of dental profession is sincere and I am keen to continue positively as a Dental Therapist in the UK. I respectfully request that my appeal be considered and all the documents already provided be reviewed again.*".

### Evidence

22. The Committee was provided with Mr Choudhry's original application documents, these being his certification of qualifications, CPD certification, self-reflections, and professional work references. The Committee was also provided with the GDC case summary.
23. The Committee has received no further evidence from Mr Choudhry in support of his appeal.

### Today's Hearing

24. The Registrar's position was provided in written form in the case summary from the GDC.
25. The GDC case summary confirms that the Panel assessed the Appellant's qualification and formed the view a number of learning outcomes had not been covered or met. The Council's position is based on the recommendation of the

Panel. This is that Mr Choudhry is not eligible for registration as a Dental Therapist as he has not demonstrated to the Council that he possesses the requisite knowledge and skill under section 36C(4) of the Act.

26. The GDC case summary also noted that although the matter before the Committee concerns the Appellant's 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. Although the Mr Choudhry's qualification has been assessed, the Council's Registration department may yet to fully complete their checks in relation to the registration requirements or may need to undertake certain checks again. In addition, given that Mr Choudhry's application was dated 25 February 2023, the Council's Registration department may need to seek updated documents before admission to the register as certain documents are only valid for a certain period of time. For example, the Council may need to request a new Certificate of Professional Status or Certificate of Good Standing if such a document is more than three months old.
27. No written submissions or further information was received from Mr Choudhry.
28. The Independent Professional Adviser set out the questions he would have asked had Mr Choudhry been present at today's hearing. These included questions in relation to Mr Choudhry's undergraduate Dentistry degree, his clinical experience whilst working as Dentist in Pakistan and in his internship year, his experience in certain areas of the role of a Dental Therapist, and the CPD and hands on clinical training he has undertaken in the UK. These also included questions relating to Mr Choudhry's understanding of a Dental Therapist's scope of practice in the UK, and relevant topics such as Direct Access and Patient Group Directions.

### **Committee's consideration**

29. The Committee has taken into account all of the evidence provided to it.
30. The Committee accepted the advice of the independent Professional Adviser, who confirmed that the skills Mr Choudhry learned in completing a BDS in Pakistan would include the knowledge required of a Dental Therapist in the UK. He also confirmed that Mr Choudhry had completed a 1 year internship and subsequently worked for 2 years as a Dentist in Pakistan after graduating, and spent 9 months working as a demonstrator. He advised the Committee that it can consider the CPD and reflection provided. He reminded the Committee that they are working from the submitted evidence, and confirmed that no further information about the deficiencies in the learning outcomes as identified by the previous assessment panel had been received.
31. 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 16 February 2026.
32. The Committee bore in mind that the burden was on Mr Choudhry to satisfy it that he has 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 he would be a safe and competent practitioner under the relevant title.

33. The Committee considered the evidence before it. It noted that no further evidence had been provided since the previous assessment panel. The Committee noted that the previous panel gave details on how to demonstrate he had met the learning outcomes, however Mr Choudhry has not provided any further CPD or evidence through references to demonstrate that he possesses the requisite knowledge and skill identified in the learning outcomes. It noted that no further documents had been submitted that showed Mr Choudhry's insight into how he may be deficient in the learning outcomes, there was no further evidence of his clinical competency such as a detailed reference from his employment as a Dentist in Pakistan, and the Committee has no evidence before it that Mr Choudhry is still registered as a Dentist in Pakistan.
34. The Committee noted that the reference from Mr Choudhry's internship year in 2016 listed the procedures that he was able to do, but was not detailed enough in providing information on his experience in the undertaking of the treatments. For example, the number of patients seen, hours worked, and whether this was under supervision. The Committee also noted that this reference was based on his experience working in 2016, and that 10 years has now passed since this clinical experience was obtained.
35. The Committee considered the professional references from Mr Choudhry's time working in the UK. However, it noted that these referred to his work as a Dental Nurse and therefore do not cover the competencies of a Dental Therapist as required to meet the learning outcomes identified. The Committee also noted some confusion in these references when there is reference to his application as a Dental Hygienist, for which Mr Choudhry has not applied for registration.

### **Committee's Decision**

36. It was the conclusion of the Committee, having carefully considered all the evidence presented, that Mr Choudhry has not demonstrated that he has the requisite knowledge and skill to be registered as a Dental Therapist. The Committee was not satisfied that there is cogent evidence that Mr Choudhry has the clinical experience to meet the requisite level of knowledge and skills. It noted that there was no evidence before it of any hands on clinical CPD courses in the UK, considerable time has passed since he last worked as a Dentist between 2017- 2019, and it did not have any details as to the clinical activity of Mr Choudhry's roles since his internship in 2017. The Committee therefore agreed with the previous assessment panel, and given that no further evidence was provided by Mr Choudhry in relation to the deficiencies identified, determined that he does not have the requisite knowledge and skill to practice as a Dental Therapist.

37. Accordingly, the Committee determined to dismiss Mr Choudhry's appeal.

**Right of appeal**

38. Mr Choudhry has the right to appeal against this decision to the relevant court in accordance with paragraph (6) of Schedule 4A to the Act.

39. That concludes this determination.

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