Dental Professionals Hearings Service

PUBLIC DETERMINATION

PUBLIC HEARING

Registrations Appeal Committee
Registrations Appeal Hearing

21 August and 22-23 October 2026

Name:	RAILEANU, Angela
Case number:	CAS-212474-Z8X0C8

General Dental Council:	Peta-Louise Bagott, Counsel Instructed by Needa Bhatti, ILAS
Appellant:	Present Assisted by Richi Seedam

Outcome:	Appeal Dismissed

Committee members:	Chris Weigh	(Chair and Lay Member)
	Sukhninder Sandhar	(Dentist Member)
	Victoria Hewson	(Dental Care Professional Member)
Legal adviser:	Alastair McFarlane 21 August 2026 Paul Kilcoyne 22-23 October 2026	
Professional Adviser:	Beverley Littlemore	
Committee Secretary:	Kate Anderson	

PUBLIC

Ms Raileanu,

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 your appeal against the decision taken by the GDC's Registrar to your application for entry to the register as a Dental Hygienist and a Dental Therapist.

2. You were present at the hearing and accompanied by Mr Richi Seedam, who whilst not your legal representative, assisted you with your evidence by asking questions. Ms Peta-Louise Bagott, Counsel, appeared on behalf of the General Dental Council (GDC). The hearing was held remotely on Microsoft Teams.

Legal framework

The Dentists Act 1984 (as amended) ("the Act")

3. Section 36C of the Act sets out the relevant requirements for qualification for registration in the dental care professionals register. Sections 36C(1)-(2) and (4) and (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.

(3) …

(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) …

(6) Matter D is—

(a) the person's identity;

(aa) that he has the necessary knowledge of English;

(b) that he is of good character; and

(c) that he is in good health, both physically and mentally.

4. Section 36CB gives the Council the power to make Rules to determine whether a person who holds a relevant qualification has the requisite knowledge and skill as set out in Section 36C(4)(b) as follows:

36CB(1) Rules may make provision for the purpose of determining whether a person who holds a relevant qualification has the requisite knowledge and skill mentioned in section 36C(4)(b).

(2) Rules made by virtue of subsection (1) may (in particular) make provision–

(a) requiring the person to undertake an assessment;

(b) imposing such other requirements on the person as the Council considers appropriate;

(c) enabling the Council to require the payment of fees for the purpose of meeting expenses incurred, or to be incurred, by the Council in determining whether the person has the requisite knowledge and skill.

(3) In this section "relevant qualification" has the same meaning as in section 36C (see section 36C(4)(a)).

5. On 08 December 2023 (effective from 09 March 2024) the Council made the General Dental Council (Dental Care Professionals) (International Registration) Rules 2023 in exercise of their powers conferred by Section 36CB and 50C of the Act.

6. The General Dental Council (Dental Care Professionals) (International Registration) Rules 2023 sets out the standards to be shown by applicants in order to satisfy the Registrar that they possess the requisite knowledge and skill in accordance with Section 36C(4)(b) of the Act.

<u>The General Dental Council (Dental Care Professionals) (International Registration) Rules 2023 ("the 2023 Rules")</u>

3. Standard to be shown to satisfy the Registrar of the requisite knowledge and skill in accordance with section 36C(4) of the Act

(1) A person must demonstrate, in the opinion of the Council, a comparable level of knowledge and skill to that demonstrated by a qualification that the Council has approved (or qualifications together that the Council has approved) in respect of the same profession or class under section 36D(2) of the Act.

(2) The Council may specify in a determination that a person must perform to the satisfaction of the Council in a test of assessment specified in the determination.

4. Requisite knowledge and skill

(1) A person may seek to demonstrate to the Council that they have a comparable level of knowledge and skill pursuant to paragraph 3(1) by providing information and evidence for the Council to take into account, of:

(a) relevant qualifications;

(b) relevant knowledge and experience, wherever acquired; and

(c) by performing to the satisfaction of the Council in any test or assessment specified in the determination.

7. The matter under consideration in this appeal is whether you can satisfy the Committee that:

a. Your qualification granted in a relevant state demonstrates a comparable level of knowledge and skill to that demonstrated by a qualification in respect of the same profession or class, satisfying section 36C(4A) of the Act;
b. That you have the requisite knowledge and skill to practise as a member of the profession to which the title applies (section 36C(4)(b) of the Act).

8. You are relying on an International Masters in 'The Role of the Dental Therapist and the Skills of the Dental Hygienist in the Study of Medicine and Dentistry' qualification obtained in 2023 at the Universita Degli Studi Di Bari Aldo Moro, Italy.

9. As the qualification was granted in Italy, a relevant European State, the Council considered the provisions under section 36C(4A) of the Act.

10. As outlined at paragraph 3 above, if the conditions of section 36C(4A) are met, section 36C(4)(b) of the Act does not apply.

11. The Council is of the view that the qualification that you seek to rely on does not demonstrate 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) of the Act.

12. It follows, therefore, that the Council applied section 36C(4)(b) of the Act to assess whether you have the requisite knowledge and skill to practise as a member of the profession of class to which the title applies.

13. When determining whether an applicant has the requisite comparable level of knowledge and skill, the Council is required under the 2023 Rules to take into account all of 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.

Background

14. You are currently registered with the Council as a Dental Nurse (GDC number: 293612). You first registered as a Dental Nurse on 10 March 2021. Your registration as a Dental Nurse is based on you obtaining the National Diploma in Dental Nursing NEBDN in 2021.

15. Your applications for registration as a Dental Hygienist and Dental Therapist were made under Section 36C of the Act. You seek to rely on section 36C(4A) of the Act, namely that your qualification is a) granted by a European State and b) demonstrates a comparable level of knowledge and skill. If section 36C(4A) is not satisfied, the Committee should consider whether section 36C(4) of the Act ("Matter C") is satisfied

<u>Your applications</u>

16. The Council received your Dental Hygienist application on 15 March 2024. The Council subsequently received a second application for the title Dental Therapist on 18 December 2024. The applications were dealt with separately, until the final decision letter sent to you on 18 July 2025 which refused you entry to DCP register under both titles. You sought to appeal the decision to refuse entry to the DCP register under both titles within your Notice of Appeal received 18 August 2025.

Dental Hygienist application

Application for registration

17. On 15 March 2024, the Council received an application for registration as a Dental Hygienist from you.

18. On 26 April 2024, the Council sent an email to you informing you that your application was incomplete and outlining the documents which were outstanding.

Assessment of application and decision

First Panel Assessment

19. Your application was first considered by the Registration Assessment Panel ("the Panel") on 18 July 2024.

20. On consideration of your Dental Hygienist application, the Panel did not recommend entry onto the register under this title. Based on the evidence provided, the Panel was not satisfied that the content of the training course which led to your primary qualification met the standards in preparing for practice and as such could not be considered a relevant qualification.

21. Further, the Panel having taken into account the information from you about your professional experience and any additional training undertaken, was not satisfied that you possessed the requisite knowledge and skill to be eligible for registration as a Dental Hygienist.

22. The Council relied on the recommendation of the Panel and made the decision to refuse your application for registration as a Dental Hygienist. The Council wrote to you on 29 July 2024 with the outcome of the assessment. The letter stated that the Panel had identified a number of learning outcomes as not having not been covered as part of your training or professional experience to allow for registration with the Council.

23. In addition, the outcome letter set out the following deficiencies and further information required:
    - Your professional referee needed to state their professional title/relationship to you.
    - Your application form stated that training was completed in both Romania and Italy indicating that part of the training was completed remotely – therefore a letter was required from your university clarifying how the course was completed.
    - Finally, the syllabus needed to be clearly numbered and tracked accurately to the learning outcomes form.

24. The Council also advised you that you could apply for a new assessment if you had new or additional information to address the deficiencies and the Council's request for information. The Council indicated that any new information would need to be received within 28 days of the decision letter.

25. Thereafter, the Council received further information from you in support of your application. This included:

    - Copy of Council's decision letter dated 29 July 2024
    - Letter from Universita Degli Studi Di Bari Aldo Moro – clarification on school pathway

- Professional Work Reference dated 14 August 2024
- Professional Work Reference dated 19 August 2024
- Universita Degli Studi Di Bari Aldo Moro syllabus

Second Assessment

26. Your application was reassessed by a further Panel on 21 October 2024. The further documents received above were considered by the Panel.

27. Following reassessment of your additional documents, the Panel remained unsatisfied that the content of the training course which led to the award of your qualification met the standard in preparing to practice, and as such could not be considered a relevant qualification. Further, the Panel having taken into account the additional information from you about your professional experience and any additional training undertaken, remained unsatisfied that you possessed the requisite knowledge and skill to be eligible for registration as a Dental Hygienist.

28. The Panel did not recommend entry onto the register.

29. The Council relied on the recommendation of the Panel and made the decision to refuse your application for registration as a Dental Hygienist in the DCP register. The Council wrote to you on 3 March 2025 with the outcome of the assessment. The letter stated that the Panel had identified five learning outcomes as not having not been covered as part of your training or professional experience to allow for registration with the Council.

30. The letter detailed the learning outcomes that appeared not to have been covered as part of your training or professional experience, and what information was required by the Council for further assessment.

31. The letter notified you of the right to appeal the decision and that such an appeal should be submitted within 28 days of the date of the letter.

32. Following this the Council received further information from you:
    - Letter from Universita Degli Studi Di Bari Aldo Moro – clarification on school pathway dated 18 March 2025;
    - Professional Work Reference dated 17 March 2025;
    - Professional Work Reference dated 17 March 2024;
    - CPD certificates;
    - Self-reflections.

Third Assessment

33. On 16 July 2025 three assessors further considered your application. The further documents received, as listed above, were before the Panel.

34. The Panel identified several concerns about the dental qualification that you seek to rely on for registration, and that a further assessment could not be completed without additional information from the University of Bari Aldo Moro.

35. The Council relied on the recommendation of the Panel and made the decision to refuse your application for registration as a Dental Hygienist in the DCP register.

36. On 18 July 2025 the Council wrote to you with the outcome of the Panel's assessment of both your Dental Hygienist and Dental Therapist applications. The letter stated that having

taken into account your relevant qualifications and all your relevant knowledge and experience acquired, the Council had decided that you were not eligible for registration at this time.

37. The letter explained that you had been asked to provide further information regarding your training course. The Council detailed that the letter provided from the training institute, Universita Degli Studi Di Bari Aldo, did not satisfy the questions asked in the decision letter or satisfy equivalence to a UK training programme.

38. The Council then outlined the information that was requested and how the material provided by you did not answer the Council's request.

39. The letter notified you of the right to appeal the decision and that such an appeal should be submitted within 28 days of the date of the letter.

Dental Therapist application

Application for registration

40. On 18 December 2024, the Council received an application for registration as a Dental Therapist from you.

41. On 25 February 2025, the Council sent an email to you informing you that your application was ready to be assessed by a Panel.

Assessment of application and decision

First Panel Assessment

42. Your application was first considered by the Panel on 9 April 2025.

43. On consideration of your Dental Therapist application, the Panel did not recommend entry onto the register under this title. Based on the evidence provided, the Panel was not satisfied that the content of the training course which led to your primary qualification met the standards in preparing for practice and as such could not be considered a relevant qualification.

44. Further, the Panel having taken into account the information from you about your professional experience and any additional training undertaken, was not satisfied that you possessed the requisite knowledge and skill to be eligible for registration as a Dental Therapist.

45. The Council relied on the recommendation of the Panel and made the decision to refuse your application for registration as a Dental Therapist. The Council wrote to you on 23 April 2025 with the outcome of the assessment. The letter detailed that a number of learning outcomes appeared not to have been covered as part of your training or professional experience to allow for registration with the Council.

46. The outcome letter also requested that you provide further information about your qualification.

47. You were advised that if you had new or additional information to address the deficiencies this would be considered by the Registrar if submitted within 28 days of the decision letter.

48. On 20 May 2025, you contacted the Council and requested an extension for the submission of further information. On the same date the Council informed you that an extension had been granted.

49. On 3 June 2025 the Council received further information from you. These were:

    - Copy of Council's decision letter dated 23 April 2025;
    - Certificate of Good Standing – Centrul Medical Hygeea dated 20 May 2025;
    - Letter from Universita Degli Studi Di Bari Aldo Moro dated 16 May 2025.

50. On 13 June 2025 the Council sent an email to you informing you that your application was ready to be re-assessed by a Panel.

Second Assessment and decision

51. Your application was considered by a further Panel on 16 July 2025. The Panel had the further documents you provided as above for the purpose of their reassessment.

52. Following reassessment of your application and additional documents, the Panel did not recommend entry onto the register. Based on the additional evidence provided by you, the Panel remained unsatisfied that the content of the training course which led to the award of your qualification met the standard in preparing for practice, and as such could not be considered a relevant qualification.

53. Having taken into account the additional information from you about your professional experience and any additional training undertaken, the Panel remained unsatisfied that the you possessed the requisite knowledge and skill to be eligible for registration as a Dental Therapist.

54. The Council relied on the recommendation of the Panel and made the decision to refuse your application for registration as a Dental Therapist.

55. On 18 July 2025 the Council wrote to you with the outcome of the Panel's assessment of both your Dental Hygienist and Dental Therapist applications. The letter stated that the Panel identified several learning outcomes as not having not been covered as part of your training or professional experience to allow for registration with the Council as a Dental Hygienist and/or Dental Therapist.

56. The letter explained that you had been asked to provide further information regarding your training course. The Council detailed that the letter provided from the training institute, the Universita Degli Studi Di Bari Aldo, did not satisfy the questions asked in the decision letters or evidence a comparable level of knowledge and skill.

57. The Council then outlined the information that was requested and how the material provided by you did not answer the Council's request. You were was asked to provide this further information.

58. The letter notified you of the right to appeal the decision and that such an appeal should be submitted within 28 days of the date of the letter.

Notice of Appeal

59. On 18 August 2025, the Council received an email from you attaching your Notice of Appeal ("NOA") in which you confirmed your wish to appeal the decisions of 18 July 2025 to refuse your registration in the DCP register both as a Dental Hygienist and as a Dental Therapist.

60. Within the NOA, you stated that you were appealing the decisions for the following reasons:
    a. Your qualification from the Universita Degli Studi Di Bari Aldo Moro was formally recognised by the Italian Ministry of Education and Ministry of Health. The qualification entitled you to practise as a Dental Hygienist and Dental Therapist in Italy and Romania under EU Directive 2005/36/EC.
    b. Your course of study consisted of academic, pre-clinical and clinical training which was consistent with the Council's published learning outcomes. The competencies had been assessed through supervised clinical practice and formal examinations.
    c. You had previously submitted evidence demonstrating equivalence to the Council's Standards. You would provide further evidence addressing the points raised in the Council's decision letter.
    d. You requested that the Committee review your evidence and reconsider your eligibility for registration.

61. Following this, the Council received further information from you in support of your appeal. The documents are as follows:
    a. Press release dated 9 January 2022 – Romanian College of Physicians (translated and original language copy)
    b. Responses to deficiencies outlined in Council's decision letter
    c. Convention between University of Bari Aldo Moro and APISE (untranslated)
    d. Logbook – Universita Degli Studi Di Bari Aldo Moro
    e. Notebook – Universita Degli Studi Di Bari Aldo Moro

62. Between 18 November 2025 to 5 February 2026 the Dental Professionals Hearings Service and yourself were in correspondence in relation to the appeal which was listed to take place on the papers without an oral hearing at your request. The Council notes that the constituted Committee hearing the appeal on the papers on 2 April 2026, directed that the appeal be re-listed for an oral hearing.

63. On 23 March 2026, you provided additional information in support of your appeal:

    a. Covering email and letter from you dated 20 March 2026
    b. University Programme Structure and Hours Summary
    c. Reflective Statement dated 19 March 2026
    d. Details of similar applicants dated 20 March 2026
    e. Letter of recommendation dated 10 December 2025
    f. Convention between University of Bari Aldo Moro and APISE
    g. Certificate of Good Standing dated 10 December 2025
    h. Press release 9 January 2022, Romanian College of Physicians
    i. Responses to Dental Hygienist learning outcomes, Universita Degli Studi Di Bari Aldo Moro dated 10 December 2025
    j. Responses to Dental Therapist learning outcomes, Universita Degli Studi Di Bari Aldo Moro dated 10 December 2025
    k. Responses to outstanding course information, Universita Degli Studi Di Bari Aldo Moro dated 19 March 2026
    l. Internship Notebook, Universita Degli Studi Di Bari Aldo Moro dated 19 March 2026
    m. Clinical logbook, Universita Degli Studi Di Bari Aldo Moro dated 19 March 2026
    n. Professional Work Reference dated 18 November 2025
    o. Experience logbook 2023-2025

p. Good Standing certificate documentation
q. Internship Notebook

64. The Council notes that you provided further information from the Universita Degli Studi Di Bari Aldo Moro dated 19 March 2026. This references the outstanding questions set out in the Council's decision letter dated 18 July 2025 and provides further information in respect of the training programme.

Today's Hearing

Initial Submissions

65. Ms Bagott, on behalf of the Council, took the Committee through the background of your appeal including your applications, assessments by panels, and your correspondence with the Council. She submitted that the Registrar's position remained as detailed in the Case Summary and referred the Committee to this document. This was that you did not have the requisite knowledge and skill to be registered as a Dental Hygienist nor Dental Therapist. She submitted that the onus was on you to satisfy the Committee that you have the requisite knowledge and skill to register as a Dental Hygienist and Dental Therapist and that the Committee should consider all of the evidence before it.

Your Oral Evidence

66. During this hearing you were not represented but were supported by Mr Seedam. During your oral evidence, due to your apprehension, it was agreed by all parties following legal advice that Mr Seedam could put questions to you to assist you in giving your evidence. 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 and Dental Hygienist in the UK.

67. You detailed the training that you had carried out for your course in Italy. You told the Committee that the theory element of the course was delivered online on Saturdays and Sundays, for about six to seven hours. Then once a month, you would undertake practical training in Romania, for 4 days over a long weekend. You detailed that you would practice on phantom heads and mannequins and were overseen by supervisors in respect of how to carry out treatments. You explained that you would also practice on other students and only when confident would you get to practice on patients, but that this was supervised. You told the Committee that your course took two years to complete, between October 2021 and October 2023.

68. You informed the Committee that you spent 6 months practising in Moldova, but that this was not continuous. You told the Committee about experience during this time including the treatments carried out, the number of patients seen, and your arrangements for working.

69. You further answered a number of questions from the independent Professional Adviser present at these proceedings. You were asked about your course, whether this was full or part time for which you provided details of what you learned and the hours you undertook. You answered questions relating to the way that your course was assessed. You also answered questions relating to the scope of practice and role of a Dental Therapist and Dental Hygienist in the UK which included treatment of periodontal disease, medication risks, local anaesthetic practice, direct access, patient group directives, the use of amalgam, and assessing toothwear.

70. You answered questions relating to your dental nursing qualification in the UK and how this led to you embarking upon a dental therapy and dental hygiene course, upon which you are relying to seek professional registration.

71. Ms Bagott 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 your experience.

72. 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 your hours of studying and working, supervision of your practice, assessments of your work, and your general experience. You also answered questions relating to hands on courses and whether you used phantom heads and mannequins. Lastly you answered question on pathology and biomedical sciences and whether these were covered as part of your qualification.

Closing Submissions made by the parties

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

74. Ms Bagott confirmed that the GDC's position remained that you do not have the requisite knowledge and skill to be registered as both a Dental Hygienist and Dental Therapist. She submitted that the Committee must consider two aspects of the Dental Act. Firstly, whether section 36C(4A) of the Act is met in respect of your qualification and whether this is comparable to the level of knowledge and skill from a UK qualification, and if not, then whether section 36C(4)(b) is met. 36C(4)(b) enables the Committee to consider all of your experience rather than just the qualification itself. Ms Bagott submitted that the burden is on you to answer both of the aspects.

75. Ms Bagott drew the Committee's attention to its powers. Ms Bagott submitted that you have been registered as a Dental Nurse in the UK since 2021. She submitted that should the Committee be satisfied that you have satisfied Matter C, then the Committee need not remit back to the Registrar in relation to Matter D [as set out above at page 2].

76. You submitted that you are an experienced Dental Nurse having qualified in the UK. You submitted that you are aware of all procedures from general dentistry to surgical dentistry. You told the Committee that you undertook the '*The Role of the Dental Therapist and the Skills of the Dental Hygienist in the Study of Medicine and Dentistry'* qualification to expand your knowledge given your background experience. You submitted that you are aware of the requirements of the GDC, are aware of the scope of practice of a Dental Hygienist and Dental Therapist, and are knowledgeable in matters of patient safety, cross-contamination, appropriate use of composite and amalgam, and direct access.

77. You told the Committee that you will only work within your scope of practice, and if you are not confident about any matter, you will seek further advice. You submitted that even if you are deemed to not be qualified as a Dental Therapist, you are qualified to be a Dental Hygienist as you have completed a lot of work.

78. You informed the Committee that you have completed a number of Continued Professional Development (CPD) courses and that you intend on completing more hands-on courses.

79. You lastly submitted that your Masters course did cover the requirements of the UK's requisite knowledge and skills to register as a Dental Therapist and Dental Hygienist and that you attended this course, having known other individuals who completed this course and were able to be registered.

The Committee's Powers

80. A decision by the Registrar 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. 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.

Committee's Consideration and Decision

81. The Committee has taken into account all the evidence provided to it, both documentary and oral. This included the recent documentation which was additional to the documents provided to the previous assessment panels. It took account of the submissions made by both parties.

82. The Committee accepted the advice of the Legal Adviser.

83. The Committee accepted the advice of the Independent Professional Adviser, who summarised the case and confirmed the evidence and information provided to the Committee for this hearing.

Committee's decision on the Dental Therapist application

84. The Committee first considered matter section 36C(4A) of the Act in respect of your qualification and whether this is comparable to the level of knowledge and skill from a UK qualification.

85. In considering whether the qualification you obtained was comparable to a UK qualification, the Committee reminded itself that it was considering all of the information before it. The Committee however was not bound by previous decisions and reminded itself that it must consider the matter afresh.

86. In determining whether your qualification obtained in Italy is comparable with one accepted in the UK, the Committee considered that the evidence before it relating to; the practical clinical elements of the course, the course structure, the method of assessment, and the quality assurance arrangements in place. The Committee noted that a UK course would be assessed by a number of graded methods of assessments, including written examinations, essays, case reports, oral examinations, and direct supervision. You gave evidence that the principal method of assessment for your Italian qualification was a 20-question multiple choice examination at the end of each module.

87. The Committee considered the course you had undertaken, and your oral evidence that this was 916 hours including 350 hours of theory and 566 hours of practical work. Additionally, you undertook independent study and therefore your total learning hours were approximately 3,000 hours. The Committee noted that the majority of the learning hours were aligned to independent study, which is not comparable to a dental hygiene or dental therapy programme in the UK. The Committee accepted the Professional Adviser's advice that a typical 3-year Dental Therapist course in the UK is 360 credits which equates to 3,600 hours of learning, and therefore your course fell short of that required in the UK. The Committee also noted that a Dental Therapist qualification in the UK is a full-time course

with direct supervision, but that the theoretical element of your course took place online on Saturdays and Sundays with one weekend per month of clinical practice. It was unclear from your oral evidence the level of supervision that this contained.

88. The Committee also noted that it was unclear from all of the evidence before it the duration of the pre-clinical element of your course and it was therefore unable to determine its duration. It was not satisfied that it was capable of being accurately compared to a UK course, which could typically take between 6-12 months and would be completed following assessments.

89. The Committee was therefore not satisfied that your International Masters in 'The Role of the Dental Therapist and the Skills of the Dental Hygienist in the Study of Medicine and Dentistry' qualification obtained at the University of Bari was comparable to a Dental Therapist qualification in the UK.

90. Having determined that your course is not comparable to that of a UK Dental Therapist course, the Committee then went on to consider whether section 36C(4)(b) is met in that you have the requisite knowledge and skill based on your experience alone. The Committee took a holistic view in making this assessment, and considered your experience in Romania, Moldova, and as a Dental Nurse in the UK.

91. The Committee first noted that the course content as analysed above was not comparable and therefore has not equipped you with the knowledge and skills required of a Dental Therapist in the UK from the course alone. The Committee took into account that you have been working as a Dental Nurse in the UK since 2018, but noted this is a completely different scope of practice. The Committee determined that it has seen insufficient evidence that you have gained the knowledge and skill required to be registered as a Dental Therapist. It was of the view that the answers you provided to the Professional Adviser in relation to practical clinical questions were consistent with the knowledge of a qualified Dental Nurse, but that you did not demonstrate that you had the knowledge required of a Dental Therapist in your answers. For example, the Committee were not satisfied that you adequately answered questions in relation to toothwear and cavity preparation for amalgam and how this would differ from that for a composite restoration, as expected of a Dental Therapist.

92. The Committee considered your experience working in Moldova and Romania. The Committee had sight of the logbook you provided which noted the clinical hours you completed as part of your course. However, it noted that there were discrepancies within the logbook including some overlapping dates and that there was an administrative note at the start of this document that stated *'This version has been completed with illustrative mock entries for training/reference only. All patient codes and clinical details below are fictional examples. It is not a real contemporaneous patient record and must not be submitted as evidence of clinical activity.'* Whilst you confirmed in oral evidence that these were clinical hours, the Committee was not satisfied that it could ignore this note. The Committee further noted that this logbook was not dated. Accordingly, the Committee was not satisfied that it could rely on the accuracy of this document. The Committee also considered that your self-reflective document discussed preventative strategies but that this was not noted in your logbook nor did you refer to it in your oral evidence. Given the discrepancies within these documents, the Committee determined that there was insufficient evidence contained within these to prove that you have the requisite knowledge and skill.

93. The Committee also took your professional work reference from Dr Pierpaolo into account. It noted that there were very few references to dental therapy work in this reference. The

Committee also noted that your CV states that your qualification in Italy is documented as Dental Hygienist, but does not state that you are a Dental Therapist. The Committee was therefore not satisfied from the evidence within the documentation provided that you have the requisite knowledge and skill.

94. The Committee has therefore determined to dismiss your appeal in relation to a Dental Therapist.

Committee's Decision on Dental Hygienist application

95. The Committee next considered your appeal against the Registrar's decision to refuse registration as a Dental Hygienist.

96. The Committee again first considered whether your overseas qualification that you undertook in the University of Bari demonstrates a comparable level of knowledge and skill to an approved UK qualification for a Dental Hygienist. The Committee noted that a UK course would include the some of the same academic input and clinical competencies as that identified above for a Dental Therapist course.

97. The Committee accepted the advice of the Professional Adviser that there is no guidance on the number of hours that must be completed to qualify as a Dental Hygienist. However, it considered that to qualify in the UK a Dental Hygienist would need to have completed a full-time course that has been assessed by multiple graded means. The Committee noted that the clinical practice element of your programme was one long weekend per month and during some holiday periods, and therefore you did not complete as many hours as would typically be necessary in the UK. The Committee also noted your oral evidence in which you stated that none of your clinical work was graded, but that you just received an overarching comment at the end. There was therefore no evidence of a grading of your work in the same manner that a Dental Hygienist would be assessed in the UK. Your theoretical knowledge was also assessed by a 20-question multiple choice test for each module, which differs from the more extensive graded assessments required of a Dental Hygienist in the UK.

98. The Committee therefore determined that as above in relation to your application as a Dental Therapist, your qualification is also not comparable to that of a dental hygiene qualification in the UK.

99. Having determined that your course is not comparable to that of a UK dental hygiene course, the Committee then went on to consider whether section 36C(4)(b) is met in that you have the requisite knowledge and skill from your experience. The Committee took a holistic view in making this assessment, and considered your experience in Romania, Moldova, and as a Dental Nurse in the UK.

100. The Committee as above in its consideration of your knowledge and skills as a Dental Therapist, noted that you have been registered as Dental Nurse in the UK since 2021. However, it noted that the scope of practice of a Dental Hygienist is different and therefore you could not rely on this experience only.

101. The Committee determined that your answers to the professional adviser's clinical scenario questions lacked detail and therefore did not demonstrate the requisite knowledge and skill required for the role of a Dental Hygienist. It noted that you could answer basic questions, however you required significant prompting regarding questions around requiring prescription for local anaesthesia and patient group directives, and managing a patient taking anti-coagulant medication and how this may impact upon the treatment provided.

You also failed to discuss the various indices you would undertake when managing a periodontal patient. All of which would be required knowledge of a Dental Hygienist in the UK. Whilst the Committee acknowledged that you were nervous, it needed to be assured that you are at the level of a safe practitioner and based upon the answers you provided it could not be satisfied of this fact.

102. As noted above, the Committee also had concerns as to the weight it could attach to your logbook given the reasons set out above.

103. Therefore, the Committee has decided to dismiss your appeal in respect of your application to be registered as a Dental Hygienist.

104. Having carefully considered all of the evidence and written submissions together with your oral evidence presented to it, the Committee is not persuaded that you have demonstrated that you have the requisite knowledge and skill, whether by virtue of your qualification or otherwise, that you are suitable for registration as a Dental Therapist nor a Dental Hygienist. 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.

105. Therefore, the Committee has decided to dismiss your appeal in respect of both applications.

Right of appeal

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

107. That concludes this determination.

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