

Sent by email to shiftingthebalance@gdc-uk.org

26 April 2017

Dental Schools Council (DSC) response to the General Dental Council's consultation, 'Shifting the Balance: a better, fairer system of dental regulation'

The Dental Schools Council supports the General Dental Council in its overall aims outlined in 'Shifting the Balance' and as a general principle we would support the GDC's efforts to move upstream in as many ways as possible. DSC would like to be closely involved in helping to inform best practices in the development of the actions going forward, using expert knowledge as the leading educators and researchers continually striving for the advancement of dentistry. DSC would like to further develop communications between dental schools, the GDC and other regulators and stakeholders, in order to share knowledge and understanding of how to build upon and connect the education and development of a dentist throughout their career. Below we have added comments to some of the specific actions included in the consultation survey.

Education

- **GDC to devise a process to ensure that the learning outcomes are agile and responsive, and continue to be based on appropriate evidence.**

DSC supports this action. The learning outcomes need to find the right balance of flexibility and stability to prevent confusion. We suggest that the GDC could also simplify its learning outcomes and use consultation processes with providers to develop these.

Any changes to Preparing for Practice documentation would need to be communicated efficiently and in a simple and digestible format to enable rapid implementation by education providers. A set of clear changes or explanations may be more appropriate than fully re-written guidance.

We would agree, that while GDC may not have specific powers of approval over Foundation or Core education and training for dentists, that it is its duty to protect the public and to develop its support of training for dentists which can work in the NHS. Without this, there is an inconsistency in approach with varying standards and this could be compromising a smooth transition from undergraduate to practice.

- **GDC to develop and adopt a risk-based quality assurance process for dental education, to be implemented in 2018-19.**

Although this seems to be a useful overall way forward, it is unclear at this stage what exactly this means, and further clarity and consultation will be needed. If possible, the relationship could be seen as supportive in the first instance. It has the potential to be a very positive approach, which we would welcome. One suggestion would be that all inspection panels

should have at least one person who currently works in a senior leadership role in undergraduate dental education.

A further recommendation would be for the GDC to review practices during inspections to try and increase consistency between assessments and collaboration between assessors, particularly in regards to recommendations around issues such as standard setting and student experience.

- **GDC to develop materials for registrants who have trained outside the UK to ease their transition into practising here.**

While it may be useful for the GDC to help to provide materials to assist in this task, using expertise available to them, DSC sees the provision and development of materials to ensure that a registrant from outside the UK can transition successfully into practice, as the responsibility of the registrant/their employer, and the relevant NHS bodies in the four nations.

The impact of Brexit needs to be carefully considered and how this may impact trainees from outside the UK. While the impacts of EU exit negotiations are not yet known, we would recommend that if possible, it would be desirable for the GDC to retain the auto-registration approach to allow freedom of movement of the brightest minds into UK dental clinical academia.

Working with partners

- **Building on work underway, the GDC to explore with commissioners and the profession the potential for effective clinical governance to play a more central role in learning and quality improvement. As part of this we will explore the development of 'indicators of patient protection'.**

A further aspect to this may be for the GDC to rethink the distinction between patients and the public. The GDC protects patients, and thus the public, by ensuring that dental professionals are registered and knowledgeable. It is we, the dental profession who then determine access to care. It follows on that our duty is to the public, whether or not they are current patients. While issues relating to access such as cost may be considered beyond regulation, there is a clear role for the GDC to further consider 'upstream' dental health, such as preventative care and wider public health, not just in relation to public confidence.

Refocusing fitness to practise

- **GDC to develop and deploy an explanation of impaired FtP that makes a clearer link to patient risk and public confidence in dental services.**

We agree that developing and deploying a very clear definition (or set of) for impaired FtP is essential for clarity and objectivity.