

2023 General Dental Council (GDC) consultation on revised Scope of Practice guidance

April 2022

Executive summary

Dental Protection is pleased to submit a response to the General Dental Council (GDC), who are consulting on *revisions to their Scope of Practice guidance*.

Dental Protection is part of the Medical Protection Society (MPS) which protects and supports the professional interests of more than 300,000 members around the world. We have supported dentists and dental care professionals in the UK for many years.

Membership provides access to expert advice and support together with the right to request indemnity for complaints or claims arising from professional practice. Our in-house experts assist members with a wide range of legal and ethical problems that can arise from their professional practice, including clinical negligence claims, complaints, and General Dental Council (GDC) investigations.

Our philosophy is to support safe practice in medicine and dentistry by helping to avert problems in the first place. We do this by promoting risk management through our workshops, e-learning, clinical risk assessments, publications, conferences, lectures and presentations.

As a member-owned defence organisation, we have a particular perspective on the changes needed that would benefit dentists, dental care professionals and ultimately patients. The GDC's consultation questions and our responses follow.

1. To what extent do you agree or disagree that the proposed Scope of Practice guidance protects patients by guiding dental professionals to practise safely within clear role boundaries?

Strongly agree Agree Neither agree nor disagree Disagree Strongly disagree

Please explain your answer:

Dental Protection is broadly supportive of the draft guidance for published for consultation. We believe additional clarification may be required in relation to some of the boundaries which we set out in our answer to question two.

2. To what extent do you agree or disagree that the proposed Scope of Practice guidance supports and guides professional decision making?

Strongly agree Agree Neither agree nor disagree Disagree Strongly disagree

Please explain your answer:

On the whole, Dental Protection agrees that the changes support professional decision making. The following comments relate to areas where we believe additional clarification may be required. The orthodontic therapist boundaries very clearly specify that an orthodontic therapist cannot carry out interproximal reduction. However, this boundary is not reflected in other roles so potentially a dental technician (under prescription), hygienist or clinical dental technician (CDT) could undertake interproximal reduction. We are unclear what the intention is in relation to this specific named procedure, but the absence of clarification may leave the document open to misinterpretation. Whilst hygienists cannot carry out permanent restoration procedures, are they able to undertake a procedure that results in an irreversible alteration to tooth morphology and/or modification to tooth substance. tooth substance? It would also be beneficial to clarify if CDTs are able to do the same. For example, create a rest seat on a tooth to accommodate a particular denture design.

3. To what extent do you agree or disagree that the proposed Scope of Practice guidance helps to enable the dental team and individuals to work to their full potential in a variety of settings?

Strongly agree Agree Neither agree nor disagree Disagree Strongly disagree

Please explain your answer:

Dental Protection agrees that the proposed changes could help to enable members of the dental team to work to their full potential within the boundaries of the roles.

4. To what extent do you agree or disagree that the proposed Scope of Practice guidance sets role boundaries while also being adaptive to changes in the dentistry environment?

Strongly agree Agree Neither agree nor disagree Disagree Strongly disagree

Please explain your answer:

Dental Protection agrees that the proposed changes set boundaries while being appropriately flexible to emerging trends and developments. However, we consider additional clarification will be of benefit as described in the response to question 2.

5. To what extent do you agree or disagree that the proposed Scope of Practice guidance can support the future delivery of dentistry?

Strongly agree Agree Neither agree nor disagree Disagree Strongly disagree

Please explain your answer:

Dental Protection agrees that the proposed guidance can support the future delivery of dentistry. It allows DCPs – in particular, dental nurses and those who have been trained in extended duties to embrace the benefits of a skill-mix approach in the future delivery of dental care.

6. In your view, what are the benefits associated with the updated Scope of Practice guidance?

Dental Protection believes that the changes encourage all registrants to understand clearly the role of each member of the dental team and define the boundaries of clinical provision. It also encourages personal development.

7. In your view, what are the risks associated with the updated Scope of Practice guidance?

Dental Protection believes that this version is clearer and less prescriptive than the previous Scope of Practice document. The risks are that patients may be confused or unclear about the Scope and we would welcome patient information leaflets that list FAQs which patients may find helpful. .

In the absence of additional clarification regarding the points we have raised in question 2, there is the potential for misinterpretation of the guidance which may cause challenges in relation to ensuring adequate and appropriate indemnity arrangements are in place.

There is a risk that some practitioners may try to ‘stretch’ the Scope of Practice to suit themselves. We believe this risk is broadly mitigated by the separate *Preparing for practice* document.

8. Please tell us below about any improvements you think that we can make to the role descriptions for each member of the dental team.

Dental professional role	Comments/suggestions for improvement
1. Clinical Dental Technicians (CDTs)	Boundaries – can CDTs adjust the dentition or undertake orthodontic appliance provision? This requires clarification.
2. Dental Hygienists	Use of ‘paediatric’ in preference to the terms ‘ deciduous’ or ‘primary’ dentition. Clarification is required as to whether hygienists can make permanent adjustments to the dentition (not just specific to restoration) or orthodontic procedures.
3. Dental Nurses	No comment.
4. Dental Technicians	No comment.
5. Dental Therapists	Can therapists undertake orthodontic procedures? This requires further clarification.
6. Dentists	No comment.
7. Orthodontic Therapists	No comment.

9. If you are aware of other uses of the Scope of Practice, by individuals or organisations, please tell us about any impacts you think the proposed changes will have.

The Scope of Practice document is referenced by indemnity providers to understand **and advise on** the limitations/ boundaries each registrant **type..** Lack of clarity could lead to misinterpretation **and lead to role ambiguity. This may then impact on indemnity costs** which should reflects the risk.

10. Please tell us anything else that you think we should consider in relation to our proposal to update the Scope of Practice guidance.

Dental Protection believes that when talking about medical emergencies in Section 1.7 part c (page 5), events other than just "collapse" should also be included. There can be other emergencies when the patient does not collapse and the whole team need to work together. We suggest this section is amended to 'there could be a medical emergency at any time, whether a patient has received treatment or not'. On page 6 of the document, there is reference to 'more complex skills may require training delivered by an accredited educational provider which includes some form of formal assessment'. There is no guidance as to how 'complexity' would be assessed by the GDC in the event of a complaint. Any additional guidance on this point would be welcomed.

11. Please tell us about any impacts you think the updated Scope of Practice guidance will have on people with the following protected characteristics:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

Dental Protection is **not aware of a reason as to why the proposed changes might** have a major impact on those with protected characteristics.

However, given the importance of this document for dental professionals and their patients we think that there could be benefit in creating accessible versions of the Guidance for those with disabilities or learning difficulties related to reading or information processing e.g., dyslexia. Anecdotally, we are aware that some dentists and DCPs may benefit from the additional support in this regard and believe that the regulator taking such steps would not only be encouraging for such members of the dental team but could also increase adherence to the Guidance. While we are not best placed to advise on such additional formats, there could be a supplementary audio version and versions in a different font and text not on a white background.

About Dental Protection

Dental Protection is part of the Medical Protection Society (MPS), the world's leading protection organisation for doctors, dentists, and healthcare professionals. MPS protects and supports the professional interests of more than 300,000 members around the world and is proud to have supported over 30,000 dentists and dental care professionals in the UK for many years.

Membership provides access to expert advice and support together with the right to request indemnity for complaints, investigations or claims arising from professional practice.

We are a mutual non-for-profit organisation and the benefits of membership of MPS are discretionary as set out in the Memorandum of Articles of Association. MPS is not an insurance company.

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