**Consultation**



**Removal of registrants’ full addresses from the online register**

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**Introduction**

* The job of the General Dental Council (GDC) is to operate a system of regulation designed to protect patients. We do this by: Approving (in some cases) and assessing the quality of dental education
* Setting and promoting standards of professional conduct
* Maintaining a register of professionals suitably qualified to carry out various aspects of dental care
* Taking steps to remove professionals from the register if they are not fit to practise

As part of our duty to maintain a register, we collect from those registered (“registrants”) a “registered address”. Following a decision made in 2006, the published version of the register has included registered addresses. This has been considered in the past to be of general public benefit in that, in theory at least, it could help patients confirm the identity of a dental professional based on their location.

We do not place any restrictions on the address that a registrant may provide and many choose to use a business address. However, for some registrants giving a business address is simply not practical, and they may be left with little choice but to provide a home address, which is then, under the current rules, published as part of the register.

Over the period since this decision was implemented, there has been growing concern from many registrants that publishing their home addresses in this way exposed them to risk and – worse – growing evidence that some registrants have experienced actual harm as a result. This is clearly not what was intended or expected in deciding to publish full addresses.

The current Council has therefore reviewed the arguments for and against continuing to publish addresses in this way. In doing so it has taken into account a wide range of factors, including:

* the requirement to publish a full registered address exists only in the GDC’s own rules and regulations (which we have the power to change).
* The Department of Health and the Professional Standards Authority recommend that an indication of location is provided, but both accept that there may be circumstances (such as privacy concerns) where this may not be possible
* how patients make use of the published register (from analysis of website traffic and approaches to our call centre)
* the arrangements put in place by other healthcare regulators: only one other regulator provides full addresses, a further two provide the general area (such as town), and those remaining choose to provide no location information whatsoever.

**The public value of the register**

Most importantly of all, the Council has reassessed where the real public value of the register lies. In terms of **public protection** – utmost in the Council’s considerations – the real benefit arises not from the register itself but from the rigorous assessment that must take place before a professional can be entered on the register. They must be suitably qualified, capable of and committed to meeting high standards of conduct. They must have gained their qualification through a bona fide programme whose quality is subject to assessment by us, if in the UK, or to similar arrangements if overseas. They must meet demanding tests of competence in English. And they must undergo background checks, eg of criminality. Only then can a professional be entered on to the register.

While these arrangements do not guard against every eventuality, they combine to ensure that, by and large, the public can have confidence in the integrity of the profession as a whole.

The Council also considered the value of the register in terms of **enabling the public to make their own enquiries** of the fitness to practise of individual professionals, and to make complaints if necessary. It took these arguments very seriously because of the potential implications for patients. However, in view of actual experience of dealing with patients through our website and call centre, the Council took the view that:

* It was an important part of the GDC’s role to identify professionals about whom concerns had been raised, and that it currently did so successfully even where patients were in possession of limited information. For that reason, the removal of full addresses from the register was unlikely to present a significant reduction in public protection
* In any event, the two most important pieces of information for identifying a professional that is the subject of concern is the location of any incident that may have taken place (which would not always correspond to the registered address) and the unique registration number of the professional. With this in mind, the location of the incident should in all but the most exceptional circumstances be available to the patient (they will generally know where they were when they experienced harm). It is already a requirement of Standards for the Dental Team (Standards for the Dental Team 6.6.10) that professionals make their registration number readily available in the dental setting, and the GDC guidance on advertising (September 2013) stipulates that registrants must ensure that a GDC registration number is displayed on any website where they are mentioned. Although there are concerns that this important practice is not universally observed. It is an essential part of the proposal we are putting forward for consultation in this document that the profession and its representatives take meaningful steps to reinforce the importance of displaying registration numbers. In the coming weeks and months, we will be working with a number of representative organisations to ensure that registration numbers, where appropriate, are displayed in the dental setting.
* Although the Council could see the potential benefit of registered addresses in terms of distinguishing between professionals with the same name, in practice such circumstances were likely to be rare

The Council also considered the potential value of the register in helping the public **identify sources of dental care**. It clarified its view that this was not the purpose for which the register was designed. It also took the view that even if this were not the case, the public was well provided for in this respect by the growing range of online resources, both public and private, and there was no immediate need for the GDC to have a presence in this field.

**Conclusion and proposals for consultation**

Weighing up the various factors, the Council concluded that while the GDC should continue to require registrants to provide an address at which they could be contacted, the risk to registrants of continuing to publish those addresses outweighed the marginal additional public protection benefits of doing so. The arguments are further strengthened by a real commitment on the part of the profession to take steps to improve compliance with the requirement that dental professionals make their unique registration number readily available to the public.

The Council is therefore proposing to remove addresses from the published register.

To do so requires a change in the GDC’s rules, and we are required to consult whenever we change the formal rules that govern the content of the online register.

We are therefore seeking formal views on the following questions:

1. The merits of the Council’s decision to **remove addresses from the online register**
2. Whether, on the GDC register in future:
	* The public should be able to see the postal town of the professional

	OR
	* The public only needs the unique registration number and registration details of the professional.



**To help us understand the context of your response, please indicate the perspective from which you are replying (please tick the box below which applies to you).**

**1) GDC Registrant**

|  |
| --- |
| Clinical Dental Technician |
| Dental Hygienist |
| Dental Nurse |
| Dental Technician |
| Dental Therapist |
| General Dental Practitioner |
| Specialist |
| Other (Please Specify) |

**2) Non-Registrant**

|  |
| --- |
| On behalf of an organisation |
| On behalf of an education provider |
| On behalf of a professional association |
| A member of the public/patient |
| Other |

**3) In your opinion, what amount of information should replace the full registered address in an entry on the online register?**

|  |
| --- |
| No location information at all |
| The general location (such as postal town). |

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1. ***Choice of No Location information***

Electing not to publish any location information of a registrant on the online register would require the Rules and Regulations which govern the content of the online register to be amended.

**Amendment of regulation 12 of the General Dental Council (Dentists Register) Regulations 2014**

1. In the General Dental Council (Dentists Register) Regulations 2014, in regulation 12 (The dentists register), in subparagraph (d), for “the address which that person wishes to be entered in the dentists register as their address” which will be deleted.

**Amendment of rule 16 of the General Dental Council (Dental Care Professionals Register) Rules 2014**

1. In the General Dental Council (Dental Care Professionals Register) Rules 2014, in rule 16 (The dental care professionals register), in subparagraph (e), for “the address which that person wishes to be entered in the dental care professionals register as their address” substitute “the post town of the address which that person supplied to the Council for the purposes of registration”.

**Amendment of paragraph 1 of the Schedule to the General Dental Council (Dental Care Professionals Register) Rules 2014**

1. In the General Dental Council (Dental Care Professionals Register) Rules 2014, in paragraph 1 of the Schedule (Information and evidence to be submitted with applications for registration and restoration), in subparagraph (e), for “the address which that person wishes to be entered in the dental care professionals register as their address” substitute “the person’s full address, the post town of which will be entered in the dental care professionals register”.

**4) Having read the proposed amendment(s) to the Rules and Regulations, do you agree that removing these sections clearly removes the obligation to publish the full registered address?**

|  |
| --- |
| Yes |
| No |

**If no, why not?**

1. ***Choice - General location information (such as postal town)***

Electing to publish only the general location information of a registrant on the online register would require the Rules and Regulations which govern the content of the online register to be amended.

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**4) Having read the proposed amendment(s) to the Rules and Regulations, do you agree that amending these sections clearly removes the obligation to publish the full registered address and instead only publish a general location?**

|  |
| --- |
| Yes |
| No |

**If no, why not?**

**5) Further comments regarding the decision to remove full addresses from the online register (700 Character limit)**

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**Who are you?**

**6) Name**



**7) Email**



**8) Address**



Thank you for taking the time to respond to our consultation.

This consultation will be open for 6 weeks and will close on **30 June 2016**. Wherever possible we endeavour to provide the maximum amount of time for a consultation to be open (regularly 12 weeks) However in light of the important issues this discussion has raised, the widespread support for the proposals, the extensive discussion which has already taken place at public Council meetings, and our intention to carry out direct research with the public through our Patient Panel, we have exercised our discretion to opt for a shorter period in this instance.

### What we will do with your consultation response

**Once the consultation has closed** we will collate all the consultation responses we have received by the deadline we will carry out a consultation analysis and produce a report for our Council to consider. Please note that:

* we cannot guarantee that consultation responses received after the stated deadline will be considered.
* it is important that, as a public body, our consultation process is transparent and fair to all our stakeholders, so we will reflect the whole range of comments made in the responses we receive in the consultation report itself.
* a consultation process is not a ‘vote’. We make decisions based on public protection, and not a simple count of the number of views expressed for or against a particular approach, although we will take that into consideration.

It is our intention that Council will consider the recommendations from the consultation by **27 July 2016**, and make a decision on the amount of information to be published. We will provide feedback to everyone who responded to the consultation on the Council’s website and explain how the consultation influenced policy development.