

**General
Dental
Council**

GDC consultation

**Consultation on amending the routes for
assessed applications as set out in the GDC's
Specialist List Regulations**

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Consultation on amending the routes for assessed applications as set out in the GDC's Specialist List Regulations

Overview

The GDC is consulting on the ways registered dentists can gain entry on to the GDC's specialist lists. In order to put these changes into effect, the GDC would need to make changes to the General Dental Council Specialist List Regulations 2008. The principal changes we propose are:

- For Oral Surgery and Orthodontics, to add an additional route to allow applications to be considered which are based on specialist qualifications gained in the UK, but where the applicant is not eligible to receive a Certificate of Completion of Specialist Training (CCST);
- For the remaining 11 specialties, to replace the current routes for Specialist Listing applications for those who have not completed a CCST with a primary route which encompasses assessed applications;
- For all specialties, to add an additional route to incorporate requirements derived from the Recognition of Professional Qualifications and Implementation of International Recognition Agreements (Amendment) Regulations 2023.

You can find the draft revised regulations in [appendix B](#) alongside this document, and we have explained the changes and asked questions about them in section three.

Consultation period and deadline for responses

This 10-week consultation exercise opened on 4 July 2024.

It will close at 23.29 on 12 September 2024.

We will be unable to consider responses submitted after that deadline.

Ways to respond

Please respond to this discussion document by using the [online survey](#).

You can also submit your response by email; please include the name of the consultation in the subject line of your email to: stakeholder@gdc-uk.org.

For details of how your data will be processed and stored, please see our [privacy notice](#). Information held by the GDC is subject to Freedom of Information requests, so please do not provide any information you would not want to be disclosed.

Response to your views

The GDC will respond to views raised during the consultation by producing a consultation outcome report. The report will be published on the GDC website.

Contact us

If you have any questions or queries about this consultation, please email: stakeholder@gdc-uk.org.

Phone: 020 7167 6330

Details of the proposals

Background

The GDC is the regulator of dental professionals in the UK, and it exists to protect the public. In seeking to protect the public, the GDC pursues three key objectives, which are set out in the Dentists Act 1984 (the Act). These are:

- to protect, promote and maintain the health, safety, and well-being of the public;
- to promote and maintain public confidence in the professions regulated under this Act; and
- to promote and maintain proper professional standards and conduct for members of those professions.

The work we do in pursuit of these objectives is aimed at ensuring that:

- only those who are appropriately trained and qualified are entered onto the registers;
- those who are on the registers continue to practise safely and professionally; and
- where a person on the register falls short of the required standards and thereby poses a risk to the public because of their competence, conduct or health, that risk is managed effectively.

The GDC has the power under s26(3) of the Dentists Act to make regulations that prescribe titles for distinctive branches of dentistry and make lists of dentists, supplementary to the register, who can use those titles. The GDC currently maintains 13 specialist lists of registered dentists who have met minimum standards of training.

Our first priority is patient safety – making sure that only the right people with the right skills are put on the specialist lists. We also want to make sure that those who have the right knowledge, skills and experience are able to access the lists via an efficient process.

There are a number of routes by which GDC-registered dentists can gain entry on to a specialist list. This enables them to use the title ‘specialist’ in relation to their particular specialty. The route they apply through can depend on the individual circumstances relating to their experience in the specialty.

Dentists who have completed a specialist training programme in the UK recommended by the relevant Postgraduate Dental Dean, may apply for the award of a Certificate of Completion of Specialist Training (CCST) and entry onto the relevant specialist list. The

proposals in this consultation make no change to the process for joining the relevant specialist list for applicants who hold a CCST.

Registered dentists who have not undertaken the specific approved specialist training programme and therefore do not hold a CCST, can apply to join a specialist list via other routes, by submitting evidence that they have an equivalent level of knowledge and experience gained in other ways. These are the Specialist List Assessed Applications (SLAA) routes which apply where an applicant:

- can demonstrate that they have knowledge and experience derived from academic or research work in the specialty in question and can satisfy the GDC that this knowledge and experience is equivalent to that which the dentist might reasonably be expected to have acquired if they had undertaken the training required for the award of a CCST in that specialty. Or
- holds specialist dental qualifications awarded outside the UK and can satisfy the Council that those qualifications are equivalent to those required for the award of a CCST in the specialty in question. Or
- [for Orthodontics and Oral Surgery only] is a dentist with a relevant specialist qualification awarded by certain institutions in EEA Member States or Switzerland¹. Or
- [for Oral Surgery only] is registered as a specialist on the General Medical Council's Register for Oral and Maxillofacial Surgery and has completed training equivalent to that required for the award of a CCST in Oral Surgery.

When SLAA applications are made to the GDC they are processed and monitored by the Registration Casework Team, who will ensure they are complete and will then refer them to an assessment panel. The panel comprises three assessors, normally including at least two from the relevant specialty, who work with the GDC as associates. The assessors are sent the applications to consider and make an individual recommendation before they meet as a panel to discuss them and agree a final recommendation to the GDC Registrar as to whether an applicant has demonstrated (from the evidence submitted) an equivalent level of knowledge and experience to a dentist with a CCST and is therefore eligible for specialist listing. The Registrar makes the final decision as to whether to admit the applicant to the specialist list.

Concerns with the current SLAA routes

The SLAA routes for oral surgery and orthodontics are set out in the European Primary and Specialist Dental Qualifications Regulations 1998. The requirements were originally set as part of the UK's implementation of the mutual recognition of professional qualifications under European law while the UK was a member of the European Union (EU). Although the UK has now left the EU, the domestic legislation remains in force as a consequence of the government's decision to continue to recognise European qualifications. This approach was reviewed by the government in 2023 and the decision was made to continue the current

¹ As specified in Annex V of Directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications

arrangements for the time being. It is not open to the GDC – and so not within the scope of this consultation – to amend the requirements set by the 1998 Regulations.

In order to ensure consistency across all 13 specialities, the GDC replicated the approach mandated for oral surgery and orthodontics for the other 11 specialities. The detailed requirements for both sets of specialities are set out in the General Dental Council (Specialist List) Regulations 2008.

In recent years, stakeholders have raised concerns about the academic and research route, which many stakeholders view as unfit for purpose. It can at times be unclear for applicants whether and how they can demonstrate CCST equivalence through academic and research experience alone as the nature of academic and research work does not necessarily provide clinical experience. This lack in clarity has become more apparent following the stakeholder engagement we conducted throughout the development of our in-house SLAA process.

Although there is specific provision for applicants with non-UK qualifications in the relevant specialty to be assessed on the basis of those qualifications, there is no equivalent route for an applicant who has a UK qualification, but was not on a training programme leading to the award of a CCST. Such an applicant can only apply through the academic and research route. Stakeholders have told us that this causes confusion among applicants, with some being put off from applying as their experience does not appear to fit well with the academic or research requirement.

Our proposals

To address these concerns, we are proposing to amend the SLAA routes to create greater clarity for applicants and greater consistency between different groups of applicants. We are also proposing amendments to implement the requirements of recent trade agreements between the UK and certain other countries.

If the government does decide in future to remove the alignment of UK legislation with EU requirements, we would expect to use the proposed approach to the 11 domestic specialities to apply also to oral surgery and orthodontics, and so to achieve a consistent regime across all the specialities.

Removing the academic and research route

For all specialities except orthodontics and oral surgery, we propose to replace the current SLAA routes for application with a single route which encompasses assessed applications. The use of the current multiple routes does not appear to have had a positive impact on the quality of applications, how they are assessed or the outcome of applications, and has caused confusion for applicants.

We propose instead that all applicants who do not have a CCST should be assessed on the basis of being able to demonstrate that they have equivalent knowledge, skills and experience gained by alternative means.

The current prescriptive routes limit the evidence that can be used for assessment, and the range of relevant evidence which will be set out in our guidance for applicants will be wider

than 'academic and research' currently provides for. Removing those constraints will provide applicants with a fair and meaningful opportunity to demonstrate their suitability for admission through a wider range of evidence.

[Adding an additional route for applicants with UK training and qualifications](#)

While we cannot make changes to the routes set out in the retained legislation for orthodontics and oral surgery applications, we want to increase the transparency and fairness of the process. Currently applicants who have trained in the UK without an NTN do not have a clear pathway for applying for specialist listing. To address this, we propose to add an additional route to specialty listing for those applicants who have undertaken training and gained specialist qualifications in the UK in orthodontics and oral surgery.

This would have the effect that, as far as possible applicants' knowledge, skills and experience are assessed on the same basis, independently of where their experience and qualifications were gained.

An additional route would offer clarity on how to apply to join the specialist list via assessment and include those with training and relevant specialist qualifications gained in the UK.

[Adding an additional route to reflect requirements derived from the Recognition of Professional Qualifications and Implementation of International Recognition Agreements \(Amendment\) Regulations 2023](#)

The Recognition of Professional Qualifications and Implementation of International Recognition Agreements (Amendment) Regulations 2023 require the GDC to recognise specialist dental qualifications gained in specific countries under certain conditions. An additional route has been added for all specialties to include applications made under the 2023 Regulations. The countries included in the scope of the 2023 Regulations is subject to change, depending on future trade deals, and so the additional route refers to the 2023 Regulations rather than specific countries.

[Amendments to the regulations](#)

The draft revised General Dental Council (Specialist List) regulations incorporating the changes to the 2008 Regulations which would implement these changes can be found in Annex 1.

Consultation questions

As set out in this document, the GDC proposes to add an additional route at regulation 6(1)(b) of the [draft regulations](#) to provide Oral Surgery and Orthodontics applicants who have gained their qualifications, knowledge skills and experience within the UK, but do not have an NTN, with a route to specialist listing.

Question 1: To what extent do you agree or disagree that we should make this amendment? Select from 1-5 (1 = strongly disagree and 5 = strongly agree). Please explain your answer.

The GDC proposes to amend the existing routes at regulation 6(2) of the [draft regulations](#) to replace the current non-CCST routes into a single assessment route.

Question 2: To what extent do you agree or disagree that we should make this amendment? Select from 1-5 (1 = strongly disagree and 5 = strongly agree). Please explain your answer.

Should the current obligation to retain the requirements under the European Primary and Specialist Dental Qualifications Regulations 1998 fall away, the GDC proposed to extend the routes set out in regulation 6(2) of the [draft regulations](#) to include orthodontics and oral surgery.

Question 3: To what extent do you agree or disagree that we should make this amendment when possible? Select from 1-5 (1 = strongly disagree and 5 = strongly agree). Please explain your answer.

The GDC is proposing to add an additional route for all specialties, to include requirements arising from the Recognition of Professional Qualifications and Implementation of International Recognition Agreements (Amendment) Regulations 2023, at Regulation 6(1)(e) and 6(2)(c) of the [draft regulations](#).

Question 4: Do you have any comments on this proposed amendment?

Equalities impact analysis

We are required under the Equality Act 2010 to have due regard to the need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by or under the Act, advance equality of opportunity between persons who share a relevant protected characteristic and those who do not and to foster good relations between people who share a protected characteristic and those who do not. As part of this we ensure the equality and diversity implications of any new policy proposals are considered.

The GDC is committed to its public sector duties to understand the impact of its proposals on people who share protected characteristics as part of this consultation process. Our analysis so far has not identified any adverse impacts on people who share protected characteristics, but we are seeking to gather further information on the impact of the proposals from respondents.

We would like you to consider whether our proposals have the potential to impact people based on their protected characteristics. Please note, you do not need to provide us with any information regarding your protected characteristics to answer this question. The protected characteristics are:

- Age

- Disability
- Gender reassignment
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

Question 5: Please tell us about any impacts you think the proposals may have in respect of the protected characteristics or any other aspect of equality, diversity and inclusion.