# General Dental Council



### **Foreword**

We are pleased to present our corporate strategy for 2026-2028, and to invite dental professionals and stakeholders to comment on our priorities and plans.

Although our role in public protection remains the same, much has changed in dentistry in recent years. We have seen digital advances in dental education and practice, changes in services and treatments, and we now have a greater understanding of the impact of regulation on dental professionals' health and wellbeing and patient care. All of that is happening against a background of continuing challenges in the provision of dental service and patients' ability to access the treatment they need.



Council has considered the changing context as well as our performance in key areas and where we need to adapt and respond to meet the needs of the professions and the public.

We have made considerable progress towards regulation which focuses on supporting professionalism, enabling learning and resolving issues quickly and proportionately, but there is more to do.

Our vision is good oral health for all. We want to play our part, with others, in achieving this. Our mission is that, through trusted and effective regulation, we will support dental professionals to provide the right care for their patients.

We want to develop our approach to regulation and how we work with others, particularly dental professionals, our partners and patients. Our updated values will drive these changes: we want to be recognised as being respectful, transparent, inclusive and purposeful.

Council has given consideration to the funding required to continue to modernise and improve efficiency while ensuring we remain financially stable and has decided to smooth delivery over a five-year horizon. Spreading out the costs associated with delivery of our strategic ambitions will help ensure financial stability, and affordability for fee-payers.

We chose to set our income at a level lower than our expenditure this year in order to reduce our reserves, which had built up to an unnecessarily high level. However, deficit budgeting is not sustainable and our current levels of funding will not be able to support what we currently do and will not allow for the investment needed to modernise our processes and systems. We also need to address unavoidable costs, such as increased employer National Insurance Contributions (NICs) and projected corporation tax liabilities over the planning period. And, of course, we need to manage our finances responsibly during continued economic uncertainty.

The costs associated with delivering this strategy are set out here. Although we are not consulting on the Annual Retention Fee (ARF), the consultation indicates the impact on fees for 2026-2028. In the coming months, we will continue to challenge our financial

assumptions and allocation of resources. Council will agree the corporate strategy in October this year which will, in turn, set the ARF for 2026.

Current projections would mean that in 2026 our strategic plans would broadly return the fee to what it was in 2023, and only slightly above the ARF in 2020 – and so significantly lower than if it had increased in line with inflation since then. We are proposing that in subsequent years we will, if necessary, adjust the ARF and any increase will be at most in line with the Consumer Price Index (CPI). This includes a commitment to deliver an additional 7% efficiency savings over the next five years.

I would encourage you to look at the proposals and what they mean for dental professionals, patients and the public. Feedback from dental professionals, stakeholders and partners is important and will help to shape the final decisions that the Council will take in the Autumn. I look forward to hearing from you over the next three months.

Lord Toby Harris

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Chair

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## Overview

## Why we are consulting

Developing our corporate strategy is the means by which we set the goals and medium-term objectives for the GDC and for the regulation of dental professionals. We review the strategy every three years to make sure that the GDC focuses its activities most appropriately to deliver its statutory objectives and adapts and responds to the changing environment in which dental healthcare is delivered in the UK.

Our strategy is strengthened by scrutiny and input from all those with an interest in ensuring that professional regulation in dentistry is effective, that dentistry across the four nations of the UK continues to be delivered to a high standard and that patients can be confident in the quality of care they receive and in the professionalism of those who provide it. This consultation provides an opportunity to help shape GDC's strategy for the next three years and we welcome and encourage responses to it.

We also have a <u>policy on how we set our fees</u>, which has been in place since 2019. As well as describing the approach we take to setting fees, it commits us to consulting every three years on our strategy and the associated expenditure plans. This is aimed at offering transparency and clarity, particularly for those on our registers, about the costs of regulation.

In this consultation paper we have therefore sought to be clear about the relationship between our regulatory activity and the fees that we charge. For each of our strategic objectives, we have described, at a high-level, the activity we propose to undertake in order to achieve the objective, and have set out what we expect that activity to cost.

Once the strategy is agreed, we will publish our costed corporate plan, which will describe in more detail the programmes of work through which we will deliver on our objectives, and the timescales over which we will undertake them. That plan is produced on a three-year rolling basis and we report annually on our progress against it.

### Consultation period and deadline for responses

This consultation exercise opened on 29 May 2025.

The deadline for responses is midnight on 21 August 2025.

### How to respond

Please respond to this consultation by <u>using the online form</u>.

You can also submit your response by email, please include the name of the consultation in the subject line of your email:

stakeholder@gdc-uk.org

If you would like to submit your response by post, please address it to:

General Dental Council Strategy Directorate 37 Wimpole Street London W1G 8DQ

## Responding to your views

We will respond to views raised during the consultation by producing a consultation outcome report, which we will publish on our website.

### How we will use your response

You can find out more about how we collect, store and process information in our Privacy Notice.

#### Contact us

This publication is available in clear print, large print, or audio formats on request.

This publication is available in Welsh and other languages on request.

You can contact us:

• By email: <a href="mailto:stakeholder@gdc-uk.org">stakeholder@gdc-uk.org</a>

• Online contact us form

Website: gdc-uk.org

Published 29 May 2025

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## Our role, purpose and responsibilities

## Our purpose is public protection

We are the professional regulator for dental professionals in the UK.

We exist to protect the public and maintain public confidence in dental professionals.

This is a role given to us by Parliament and set out in the Dentists Act.

In order to fulfil that role we:

- set requirements for dental education that support people to develop the knowledge, skills and behaviours required for entry onto our register
- maintain a register of dental professionals who meet our standards and are able to practise dentistry in the UK
- set, maintain and promote standards and professional guidance that support professional practice, and requirements for lifelong learning through our Continuing Professional Development (CPD) scheme
- investigate serious concerns raised about a dental professional and act to protect the public if needed.

By doing those things, we aim to promote and maintain public confidence in dental professionals.

Our overriding purpose is at the core of everything we do.

Our strategy sets out our vision, mission and objectives, and describes the work we intend to do to achieve them. Some of this involves doing what we do now, but doing it better – with modernised systems and more user-friendly approaches. Other elements require us to think differently about how to achieve our desired outcomes, and particularly how we respond to developments and pressures in and on the sector and changes in patient needs and behaviours.

## Our vision, mission and values

Our role is to provide an effective regulatory system, but the purpose of that system is to enable dental professionals to meet the oral health needs of the population. So our vision is a broader one, which we share with others working across all aspects of dentistry and which we know must be a long-term aspiration. That **vision** is:

#### Good oral health for all

We want everyone in the UK to have access to safe and effective oral healthcare, and to work with our partners and stakeholders towards that vision. Inherent in this is the need to understand and address health inequalities in respect of access, experience and outcomes. Our role in in public protection therefore goes beyond the mechanics of regulation, and involves working with others to ensure delivery of safe and effective care.

We cannot realise this vision alone, but we can play a key role in creating the environment in which there are more dental professionals equipped to deliver the care that people need. That means working with our partners in dentistry, healthcare and regulation; with the UK and devolved governments; and with the dental professions, towards this shared goal.

Our **mission** describes our role in realising the vision.

# Through trusted and effective regulation, support dental professionals to provide the right care for their patients

A key part of our statutory purpose is to maintain confidence in the dental professions.

There are clear connections and inter-dependencies between confidence, trust and effectiveness.

Figure 1: Trusted and effective regulation



In delivering this strategy, we will be focussing on building trust with those that we work with, including the dental professions and patients, and improving our effectiveness in how we operate and regulate.

Because we cannot be effective without being trusted, and we cannot be trusted without being effective.

Our mission emphasises the importance of the supporting and enabling role that regulation can and should play in delivery of safe and effective care. The objectives that we have set for ourselves describe how we will fulfil that mission.

A key aspect of our strategy is to build an organisation which lives by – and acts in accordance with – its **values**. Our values shape how we work and how we interact with our partners, the public and patients, dental professionals and our colleagues.

Figure 2: GDC values



We have adopted these values recognising the challenge which they represent. We know that many of our stakeholders will not recognise them as describing the GDC of today. Our commitment – and a guiding principle running throughout this strategy – is to strive to act in line with those values so that they become recognised over time as characterising the GDC and everyone's experience of us.

In line with these values, equality, diversity and inclusion are central to everything we do, both as a regulator and as a responsible employer.

In 2024 we undertook to ensure that equality, diversity and inclusion was central to our corporate purpose and strategy, and we have sought to give effect to that commitment in our vision, mission and objectives.

The priorities and activities set out in this strategy, which demonstrate how we will achieve our strategic objectives, include activities specifically focused on promoting inclusion and reducing inequality. Making this work part our core strategic activity, better demonstrates our commitment to equality and diversity in everything we do.

We will continue to report on the progress towards our goals in relation to equality, diversity and inclusion, in line with our values.

# Refreshing and refining our focus: building on progress so far

The approach set out in this strategy is consistent with previous strategic approaches. In particular, we continue to advocate for a model of regulation which focuses on supporting professionalism, enabling learning, and resolving issues quickly and proportionately.

Our delivery over the last three years therefore provides us with a solid foundation on which to build, including:

- A modern and improved framework of learning outcomes for education for all dental professionals, establishing the requirements and expectations for dental education.
- Collection and publication of data on the working pattens of dental professionals, contributing to the body of information and intelligence to support informed strategies on workforce development and deployment.
- Revisions to all the curricula for specialty education, and improvements in the process for assessing applications to the specialist lists.
- A well-established dental leadership network, which supports collaboration, sharing
  of information building of consensus on priorities for action.
- More effective support for local resolution of complaints, delivering more appropriate outcomes for patients and empowering professionals.
- An efficient and accessible model for operating hearings, in which most hearings take place online.
- Changes to the information we publish following interim orders hearings, to support
  proportionality and help protect the privacy of those involved when allegations are
  untested.
- Changes to our fitness to practise process, such as the introduction of a new approach to initial inquiries, aimed at establishing the extent of investigation required and enabling more rapid closure of cases which do not require further investigation.
- New rules to govern our international registration processes, giving us a wider range
  of options for enabling access to the registers, and working with our delivery partners
  to significantly increase the capacity of the Overseas Registration Exam (ORE).

We have made significant progress over the previous strategy period. However, our core strategic goals are long-term ones, and we are still some way from fully achieving them. Our legislative framework does not support modernisation or change and continues to constrain our progress, meaning we cannot advance as quickly as we would like.

While our strategic direction remains consistent, we understand that the environment in which we are working has changed significantly. Our approach therefore requires a renewed focus and a shift in emphasis to take account of the changing context and environment.

# Understanding the strategic context

Our approach to regulation needs to adapt to a constantly changing context, taking into account developments such as changing patient needs and expectations, the wider environment in which dental professionals are working, and new models of care, including remote treatment and advancing technology.

We have considered available evidence, and worked with our Council and with partners to identify the key threats and challenges facing the sector that we need to respond to.

# There is a serious and continued strain on access to dental services – particularly NHS services

We know that the biggest concern for dental patients is access – particularly to NHS dental services. Our research in 2024 indicated that just under a third of those responding did not have a regular dental practice, and a fifth had been unable to book an appointment when trying to do so. Analysis also shows that this lack of access is not felt equally across geographical or social groups, which can lead to increased health inequalities. Unmet need for preventative dental care can result in increased need for remedial treatment later, with consequent impacts on patients and professionals.

Our 2024 research also indicated that the shift from NHS to private dentistry has been sustained and will therefore be continuing to impact equitable access to dental services, due to affordability as well as availability.

# Some of our international routes to registration are not currently able to meet demand

The number of new dental professionals joining the register each year is slowly increasing. While the number of UK qualified dental professionals has grown slightly, the number of internationally trained dental professionals joining the UK register has grown significantly in recent years. In 2024, only 53% of newly registered dentists were UK-trained, continuing a trend that underscores the vital role of international recruitment in sustaining workforce capacity.

When dental professionals with overseas qualifications join our register, we need to have processes in place to ensure they meet the high standards we require for registration. But our processes should not be an unnecessary or disproportionate barrier to entry to the UK workforce. In the past five years we have seen very significant increases in demand for the ORE. Despite increases in the capacity of the exam, made possible following a recent legislative change, that demand has continued to outstrip supply. Coupled with that, policy changes following the UK's exit from the European Union (EU) continue to take effect, and we will need to adapt our assessment frameworks to maintain rigorous yet efficient evaluation processes, supporting effective workforce expansion while maintaining patient safety.

# Fitness to practise is adversarial and can impact dental professionals' mental health and wellbeing

We know that that the fitness to practise process can negatively impact the mental health, wellbeing and confidence of dental professionals. Our research demonstrates that very clearly, and shows in particular that the threat of fitness to practise proceedings, and prolonged case resolution times are key causes of stress in dental professionals. Not only does this impact the trust that the profession and our partners have in the GDC, but it can have a direct impact on patient care, and is likely, over the long term, to affect career choices and retention.

# A climate of fear exists within dentistry, driven by mistrust of regulation

Over the years, a climate of fear has grown within dentistry. We understand that this has, at least in part, been driven by mistrust and fear of regulation, and in particular of the fitness to practise process.

Our research suggests that this starts early in a dental professional's career, as their perceptions of the GDC decline quite sharply post-qualification – with terms such as 'fear' frequently associated with regulation.

This climate of fear can have a significant impact of the effectiveness of regulation. The threat of fitness to practise can impact a dental professional's confidence, reduce the dental procedures that they are willing to undertake and might also result in their leaving the profession – all of which can have a serious impact on patient access and patient care.

## Dentistry is changing and we need to change with it

Dentistry is evolving, requiring us to adapt our regulatory approach. The rise of cosmetic dentistry and aesthetic procedures is blurring the line between essential healthcare and elective treatment, raising questions about patient expectations and professional responsibilities. Technology is also transforming dentistry, with innovations in digital diagnostics, treatment planning, record keeping, and patient communication happening at pace. Delivering effective and proportionate regulation is critical to enabling innovation while maintaining public confidence.

# We need to meet the needs of a diverse public and diverse professions

We serve a diverse public, and need to ensure that our strategy recognises that. We need to make sure we understand public and patient needs, and to address them, with a clear and specific focus on improving equality and inclusion. This includes playing our role in reducing

<sup>&</sup>lt;sup>1</sup> Experiences of GDC fitness to practise participants 2015 – 2021: A realist study November 2022 (gdc-uk.org)

health inequalities – in respect of access, experience and outcomes – as well as ensuring that the services we provide and the ways in which we communicate are accessible to everyone.

Parts of the dental workforce are changing. We are, for example, seeing more women becoming dentists: in 2024, 61% of newly registered dentists were women. We are also seeing increasing numbers of internationally trained professionals joining the registers, which has an impact on the diversity of the workforce. We also know that our fitness to practise data shows that certain ethnicities and internationally trained professionals are overrepresented in proceedings compared to white and UK-trained counterparts, particularly at the early stages of the process.

We therefore need to understand why this is happening, and particularly whether it is indicative of bias or of the need for strengthened support or guidance.

A clear and effective framework that supports professionalism is a key tool in ensuring that the workplace is safe and inclusive. Sexual misconduct, both inside and outside the workplace continues to be an issue which predominantly negatively affects women, and which is exacerbated by power imbalances within workplaces. There is a clear role for us, as the professional regulator, in making it clear that sexual misconduct is unacceptable, and in doing all we can to eliminate it within dentistry.

#### What does this mean?

The challenges described above require us to respond. Developing this strategy provides an opportunity to refresh and refine our approach to take account of the opportunities and threats we face.

While our core regulatory responsibilities remain unchanged, we must ensure our processes, policies, and engagement strategies evolve to meet the needs of the professions and the public. By fostering trust, promoting fair and effective regulation, and ensuring our approach remains responsive to the changing landscape of dentistry, we can continue to uphold high professional standards while supporting a sustainable and resilient dental workforce.

## Where do we want to be by 2030?

In developing our vision, mission and objectives, we have sought to look beyond just the three-year strategy period and articulate what we want to have achieved and how we want to be working by 2030, so that we set ourselves on the right course.

Our aim is for the GDC of 2030 to be:

- living by our values and be seen to be doing so
- trusted by the public, dental profession, and our partners, to do the right thing with fewer dental professionals fearing us
- fully effective in delivering our four key regulatory functions
- maintaining the integrity of the dental register by regulating in a timely and proportionate way
- setting standards and professional guidance which supports dental professionals to make the right decisions
- financially robust and operationally efficient
- taking full advantage of modern digital tools and channels
- a collaborative partner, valued by people and organisations across the sector
- · an employer of choice, attracting and retaining the right staff
- a fair and inclusive regulator and employer, embedding equality, diversity, and inclusion across all our functions.

We also want to be working within an improved, legislative framework which allows us to improve and adapt to regulate effectively now and in the future.

Our legislation is outdated and an impediment to effective regulation in a number of areas. We have been strongly advocating for regulatory reform for several years, and will continue to do so.

However, we understand that the prospect of wholesale legislative change over the next three years is limited, so our immediate focus will be on securing incremental change to our legislation where possible, and continuing to do what we can to improve and challenge existing processes and approaches within the constraints of the current legislation. Our priorities will be to reduce the negative impacts of regulation, which can lead to fear and stress for professionals, and to adopt a more empathetic approach. Through this we hope to become more trusted, effective and efficient and ultimately to achieve better outcomes for patients and the public.

# Our draft strategy: a summary

The following pages contain more detail on our objectives and activities. This page aims to illustrate the key elements of the strategy in a simple diagram.

**Vision** Good oral health for all Through trusted and effective regulation, support dental professionals to provide the **Mission** right care for their patients Equality Values-led **Objective Objective Objective Objective Objective** Diversity and Inclusion Respectful Support dental Improve fitness Maximise the Get the right Work to practise, professionals to people on the collaboratively effectiveness of **Transparent** provide the right dental registers our people, our maximising to speak up on, Inclusive care for their at the right time culture and our patient safety influence and patients and reducing address issues systems Purposeful unintended that affect impacts patients and the public

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- a collaborative partner, valued by people and organisations across the sector
- an employer of choice, attracting and retaining the right staff
- a fair and inclusive regulator and employer, embedding equality, diversity, and inclusion across all our functions.

# What will we do to achieve our goals?

We have identified five strategic objectives that we need to achieve to deliver on our mission and to play our role in realising our vision.

#### These are to:

- 1. Support dental professionals to provide the right care for their patients.
- 2. Get the right people on the dental registers at the right time.
- 3. Improve fitness to practise, maximising patient safety and reducing unintended impacts.
- 4. Work collaboratively to speak up on, influence and address issues that affect patients and the public.
- 5. Maximise the effectiveness of our people, our culture, and our systems.

# Objective 1: Support dental professionals to provide the right care for their patients

We know that the most effective way we can protect patients is through 'upstream' regulatory levers which focus on preventing harm from occurring through equipping and empowering dental professionals.

We do this in a number of ways, including ensuring the quality of dental education and training in the UK; promoting professional standards and guidance; and through setting requirements to enable professionals to keep their knowledge and skills up to date via CPD.

To do this more effectively, we want to regulate in a way which promotes learning over fear – that supports dental professionals to continuously demonstrate professionalism, rather than driving behaviours through the threat of fitness to practise.

It is our role to provide a clear, accessible and forward-looking guidance framework to support that professionalism and good decision-making, for the benefit of patients and the public.

We aim to develop and deliver that professional guidance in ways which create an environment in which dental professionals can flourish. Our guidance therefore needs to:

- Be forward-looking, considering new or emerging risks or challenges.
- Encourage positive professionalism by supporting and empowering professional decision-making.
- Promote patient safety by focussing on what makes things go right, and how this can be applied in different contexts.
- Set clear expectations of dental professionals, based on patient needs and public expectations.
- Help to foster a learning culture, promoting and encouraging good practice and continuous improvement to achieve positive patient outcomes.
- Be made available to all dental professionals in a format that they can easily identify, access and understand.

Trust in the GDC and the way we regulate is integral to developing this more supportive approach. If our professional guidance is useful and seen as valuable to the profession, this will improve trust in regulation. The more trusted regulation is, the more likely dental professionals are to engage with the professional guidance that we set.

#### We will do this by:

Developing and maintaining a principles-based standards and guidance framework that captures and responds to new and emerging threats and concerns and working with the professions to promote and embed it and make it a valuable and accessible tool by:

- Continuing to develop a new professional guidance framework, based on the principles of professionalism.
- Identifying emerging issues, trends and information needs.
- Co-ordinating and developing a range of professional guidance and supporting materials to support professionalism.
- Actively promoting and embedding professional guidance.

#### Developing a learning culture in our approach to regulation by:

- Using our own research and insight, and working with partners, continuously identify sources of learning, including analysing fitness to practise data to provide insight into areas of practice risk.
- Feeding this learning into development of professional guidance and maintaining the lifelong learning scheme.

Addressing the climate of fear within dentistry and increasing trust in regulation through enhanced communications and engagement with the profession and our partners by:

- Strengthening our engagement with student and trainee dental professionals, the professions and our partners.
- Maintaining a transparent and constructive dialogue about what we are doing and why.

#### Supporting dental professionals, taking into account their diverse needs by:

- Improving our understanding of the diverse needs of dental professionals and students and how we can support them.
- Developing information for those joining the registers from overseas to help them understand the expectations for the delivery of good oral healthcare in the UK.
- Better understanding the existence and prevalence of discrimination in dentistry and what we can do to address it.
- Ensuring that we meet the diverse needs of professionals who interact with our services.
- Continuously improving our understanding of the working patterns of dental professionals, sharing data and analyses with the sector.
- Ensuring that our digital communications offering is accessible.

#### Supporting all dental professionals to practise safely in a modern healthcare landscape by:

- Developing a more agile approach to responding to changes and advances in dentistry, society and technology, and ensuring that our approach to tackling illegal practice keeps pace with this.
- Recognising, and enabling effective use of the range of skills across the dental team to deliver oral healthcare.

### Objective 2: Get the right people on the registers at the right time

The most important way we protect patients and the public is by ensuring the integrity of the registers. This means making sure that those on the registers demonstrate the professional knowledge, skills and behaviours to practise dentistry safely and effectively, so that the public can have confidence in the dental profession.

But we also need to ensure that our processes do not present an unnecessary or disproportionate barrier to those who have the right skills and experience. We recognise that the current capacity of some of our international registration routes is insufficient, and that this has an impact on workforce capacity as well as on those professionals seeking to register with us. We therefore need to do more to ensure that all our routes to registration protect the public effectively by better enabling access to dental treatment and, particularly, preventative care.

This will become increasingly relevant as current routes, particularly those involving recognition of EU qualifications, change in line with government policy and the UK's relationship with the EU.

#### We will do this by:

Ensuring education and training continues to produce safe professionals and meet patient need by:

- Evolving and adapting our approach to quality assuring education and training, and responding effectively to new courses and providers.
- Ensuring education and training programmes adopt the Safe Practitioner Framework, and have formal approaches to monitoring student behaviours, and addressing behavioural issues.
- Using research and engagement to capture the voice of students and early career registrants and understand their experiences of education and training.

Developing a comprehensive and accessible framework to register internationally qualified dental professionals, for all dental professions by:

 Exploring and evaluating options for assessing internationally qualified applicants, to create an efficient and effective, forward-looking international registration framework that can meet future capacity demands.  Working closely with partners to develop and implement new routes to registration for internationally qualified professionals, including, legislation permitting, a robust system for provisional registration which keeps patients safe and meets the needs of the system and the profession.

#### Ensuring all of our registration processes are efficient and effective by:

- Modernising our registration and renewal processes, enabling digital and online interfaces where possible.
- Identifying and addressing inefficiencies in our current processes.
- Making sure our registration processes are fully accessible to help ensure an inclusive dental workforce.

# Objective 3: Improve fitness to practise, maximising patient safety and reducing unintended impacts

An effective and proportionate approach to determining fitness to practise plays a vital role in ensuring patient safety. It is important that we operate fair and effective processes that:

- enable people to raise concerns
- support learning and remediation where possible
- are concluded in a timely way so as to minimise stress on all parties
- deliver proportionate outcomes.

We know that our current approach to fitness to practise can feel punitive and disproportionate to those under investigation and that as a result it can negatively impact the mental health and wellbeing of those involved. We also know that fear of fitness to practise is a key factor in levels of stress for dental professionals and a driver of the climate of fear.

While we have made a number of changes to our fitness to practise process and approach since 2018, we know we need to do more, particularly to explore less adversarial ways of handling and resolving concerns, so as to deliver the right outcomes over the right timeframe.

Only a small proportion of the concerns raised with us are either so serious or so irremediable that they require a sanction or restriction on a professional's practice. The majority of cases involve less serious concerns which will eventually close with no finding of impairment or any sanction. In many of the cases we investigate there are opportunities for earlier interventions focused on remediation and learning, through which we could reduce the punitive effect of the process. Shifting to a more prevention-focused regulatory model – one that prioritises support, risk-mitigation, and professional development – can also help build trust with the profession, while maintaining public protection.

### We will do this by:

Exploring how we can use fitness to practise to manage risk more effectively, within the current legislative framework. This will include:

- Actively exploring and testing the boundaries of our legal framework and developing options for change by challenging existing positions, and thinking innovatively about how to make further, more impactful changes.
- Exploring greater use of less adversarial approaches to closure of cases (such as remediation), in order to decrease the punitive effect and maximising the learning potential of fitness to practise.

Working with dental professionals and our partners to better understand the elements of the current process that have the most negative impact on mental health and wellbeing of those involved, and work collaboratively to address them. This will include:

- Using research, evidence and data, as well as ongoing engagement with dental professionals to ensure that we understand the impact of the various elements of the process on everyone involved in fitness to practise.
- Working with professionals, partners and stakeholders to develop, test and evaluate
  ways of reducing that impact, both by seeking to make changes to the process and
  by enhancing the available support.

Gathering and using evidence to improve our understanding of the impact of fitness to practise on dental professionals, including looking at factors related to equality, diversity and inclusion (EDI), to ensure our processes are fair and equitable. This will include:

- Continuing to analyse our registration and fitness to practise data, to explore and identify EDI related correlations and any change over time.
- Listening to user voices via our public, registrant and student panels to inform our efforts to mitigate the risk of bias/discrimination, and to test and evaluate our responses.
- Better understanding who is raising concerns with the GDC and the Dental Complaints Service and identifying any trends which may provide insight into accessibility of the dental complaints system.

# Objective 4: Work collaboratively to speak up on, influence, and address issues that affect patients and the public

Given the complex and changing environment in which we work, collaboration and partnership working are key to success. We have sought to make the most of the opportunities to develop relationships, provide platforms for discussion and promote joint working on key issues in dentistry. We want to build on this approach and to become a trusted leader within dentistry, utilising new and established partnerships to identify the issues that matter to patients and the public and to effect change by developing joined up solutions.

We will continue to gather insight to make sure that our work is evidence-led. We will use that insight to inform our conversations with other leaders in dentistry, to improve outcomes for patients and the public.

### We will do this by:

Continuing to build a robust evidence-base to inform our work, and where appropriate sector-wide discussions and initiatives, for the benefit of patients, the profession and public protection by:

- Ensuring we listen to diverse professional, patient and public voices and using this to inform our approach.
- Identifying areas in which we can positively contribute to advancing sector-wide insight and undertaking appropriate research and evidence gathering.

Collaborating with others on issues that benefit patients, the profession and public protection by:

- Developing partnerships to help us identify and address issues.
- Working to build trust in the GDC to strengthen our ability to lead and influence.
- Developing a better understanding of inequalities in access, experience and outcomes in oral health and the GDC's role in addressing them.

Identifying ways in which the regulatory framework can be improved, and using our influence to effect change by:

- Working with professionals, partners and stakeholders to identify how we can influence and effect change in the absence of wholesale legislative reform.
- Establishing opportunities and priorities for amendments to legislation and process and building the evidence base to support them.
- Taking a proportionate approach to ensuring our readiness for reform, so that we maximise our ability to take opportunities should they arise.

# Objective 5: Maximise the effectiveness of our people, our culture and our systems

The GDC can only be an effective regulator if it is an effective organisation. Our new values challenge us to be at our best in how we operate internally as well as in how we relate to dental professionals and our wider stakeholders.

Enabling success requires us to create the right environment to support delivery through a robust workforce plan and framework enabling recruitment and retention of skilled and effective teams, development of those teams and strong and decisive leadership.

We also need to make sure that our services, processes and the way in which people interact with us are user-focussed, up-to-date, digital where possible, efficient and effective. We need to make sure that those who interact can do so easily and that nobody experiences unnecessary barriers when doing so. This is particularly important if we are to increase our regulatory effectiveness.

#### We will do this by:

Focusing on recruiting people with the right skills and capabilities, who share our values and can deliver our ambitions and developing an organisational structure capable of delivering our ambitions. This will include:

- Developing an evidence-based workforce plan to develop the right organisational structure for the GDC.
- Identifying and implementing improvements in our recruitment processes.
- Providing a competitive and fair employment offer, and an employee experience that matches our promise.

Developing a culture of high performance, by investing in our people to deliver our ambitions. This will include:

- Investing in the skills and capabilities of our people to meet current and future requirements.
- Developing outstanding leaders and people managers at all levels in the organisation.
- Implementing the recommendations of our board effectiveness review, making improvements to our governance structures and processes to make decision-making more effective and efficient.

Working to ensure that colleagues and teams remain engaged and supported to deliver more effective services and outcomes for dental professionals and the public. This will include:

- Making sure our people understand how their role and team contributes to our purpose, role and ambitions.
- Supporting colleagues with their well-being, raising awareness and providing appropriate support.
- Ensuring we have the right working environment to enable colleagues to perform to their best.

Continuing to build an inclusive workplace which values diversity, proactively identifying and challenging inequality and discrimination. This will include:

- Understanding and acting on what our employee data is telling us.
- Ensuring that managers and colleagues are equipped to lead and work in diverse teams.
- Developing an inclusive workplace which challenges discrimination and inequality through development and implementation of a clear and appropriate policy framework.

Ensuring our teams have the tools they need to provide an effective and efficient service, centred on the needs of the user. This will include:

- Modernising our IT estate, following best practice, ensuring the quality and safety of our data and facilitating more effective working, taking into account the diverse needs of our staff.
- Understanding users' experience of us and re-shaping how we interact with people.

Adopting modern digital communications channels to ensure that we can communicate with dental professionals, patients and the public in the ways which work best for them, making sure that our communications are inclusive. This will include:

- Making best use of different channels for communication.
- Reviewing and improving our websites.
- Ensuring that we meet the diverse needs of all those who interact with our services, including those who are digitally excluded.
- Ensuring that our digital communications offering is accessible to all.

# Understanding and reporting on our progress and performance

We will monitor and report on our progress against the objectives we have set out in this strategy, using a range of methods and evidence sources appropriate to the objectives.

This will include:

#### Objective 1: Support dental professionals to provide the right care for their patients

- Information, data and outcomes from our education quality assurance processes
- Research into student, early career registrants and stakeholder experiences, attitudes and perceptions over time.
- Levels of failure demand in relation to our policy framework.
- Feedback from stakeholders.
- Performance against PSA standards.
- Using registrant, student and patient and public panels to inform, test and evaluate what we do.

#### Objective 2: Get the right people on the registers at the right time

- Delivery of a legal and policy framework for international registration that enables smooth workforce supply.
- Analysing and sharing working patterns responses.
- Demand and supply in international registration pipelines are well matched
- Timeliness in UK and international registration.
- Performance against PSA standards.
- Research and statistical analyses to understand the diversity of outcomes, experiences, and perceptions of those applying to join GDC's register.

# Objective 3: Improve fitness to practise, maximising patient safety and reducing unintended impacts

- Research into the experiences of those involved with fitness to practise
- Research on stakeholder perceptions, focusing on fear and the impact of regulation on dental care
- Quality of fitness to practise decision making at every stage of the process
- The time we take to conclude the fitness to practise process
- Performance against Professional Standards Authority (PSA) standards.
- Research and engagement using registrant, student and patient and public panels to inform, test and evaluate fitness to practise development and improvement.
- Statistical analysis of fitness to practise outcomes to identify disproportionate correlations (for instance in relation to EDI, registrant role, time on the register).

# Objective 4: Work collaboratively to speak up on, influence, and address issues that affect patients and the public

- Research on stakeholder perceptions.
- Research on the public's experiences of accessing and receiving dental care.
- Clear links between our policy frameworks and the available evidence.
- Depth and breadth of our consultation and engagement.
- Research and engagement with registrant, student and patient and public panels.
- Impact of our collaborative work in identifying and addressing health inequalities in oral health outcomes and experiences.

#### Objective 5: Maximise the effectiveness of our people, our culture and our systems

- Staff monitoring data and feedback, including:
  - o Recruitment/retention.
  - Sickness absence.
  - o Engagement.
  - o Learning and development.
  - Staff feedback.
  - Staff EDI.
  - Recruitment and development (KPIs and goals).
- Using statistical and qualitative analyses to interrogate and draw insight and learning from a range of data and evidence sources.
- Customer feedback and satisfaction levels.

Using this range of measures will enable us to take a rounded view of our performance and the impact we have as a regulator.

At the beginning of each year, we prepare and publish a three-year rolling costed corporate plan, which sets out our activity in detail. Our Annual Report and Accounts, which is laid before the UK and Scottish Parliaments, reports on our performance and expenditure.

In addition, as we develop detailed plans to deliver the initiatives described in the strategy, we will develop associated evaluation and success criteria that will demonstrate how our actions will deliver on our strategic objectives.

This strategy sets out our ambitions and, at a high level, the activity we plan to undertake to achieve them. It will be underpinned by a set of supporting strategies relating to different elements of our business, which will contain further detail on how we will approach and deliver our work. These include strategies focused on:

- People.
- Finance and investment.
- Digital technology.
- Research.
- Communications and engagement.
- Data.
- Sustainability.

These supporting strategies will detail monitoring arrangements and success criteria.

## Our expenditure plans

Development of this strategy has involved consideration and analysis of the environment in which we are operating. The economic climate and our own financial situation are key elements of that context, so it is vital that our strategic and financial plans are developed hand in hand.

The objectives and activities we have set for ourselves describe what we believe we need to do in order to regulate effectively. This includes significant new initiatives renewed focus and investment in some of our existing work programmes in order to ensure delivery. In order to mitigate the impact of this additional investment, and to maximise cost-effectiveness, we propose to spread the additional cost over a longer period. We also plan to deliver significant efficiencies over that period. Some of these will be as a result of improving the way we work – for example by moving from paper-based to online systems, while others will be as a result of challenging the way we work in order to maximise value for money.

Rigorous financial management enabled us to reduce the ARF significantly in 2020, followed by a small rise in 2023. By 2024, our financial reserves had grown to an unnecessarily high level. We therefore decided to reduce the ARF so that our expenditure would exceed our income, with the effect that the excess reserves would be returned to registrants.

That approach could only continue for a limited period before income and expenditure needed to be brought back into balance. In addition, we have had to meet significant additional costs, which were not foreseeable when the decision to reduce the ARF was made. These additional costs include increases in employer NICs and changes to the employment status of associates, which came with considerable financial liabilities, our expenditure has exceeded our income by more than we anticipated. We therefore cannot continue to use our financial reserves to cover our expenditure.

We know that some of what we need to do to deliver the strategy requires additional investment, so alongside development of the strategy, we have prepared expenditure plans. These plans are aimed at supporting delivery of the strategy with cost-effectiveness and efficiency as key drivers. Opportunities for specific efficiency improvements will be identified as projects and programmes are developed. In addition to specific savings from our current project to modernise our registration processes and from more effective use of our estates, we are also setting ourselves the target of delivering a further 7% efficiency savings over the next five years from our current business activity. Further detail of the investment and anticipated efficiency programme will be provided in our Medium-Term Financial Strategy that we will publish later this year.

Our <u>policy on fee-setting</u> requires us to be clear about, and consult on, the expenditure plans associated with our strategic ambitions. And our commitment to transparency as one of our values means that we need to explain the reasons and rationale for our proposals and the anticipated impact of them on those we regulate.

Since our income derives almost solely from the fees paid by dental professionals, increased operating costs and additional investment will have an inevitable impact on those fees. The

expenditure plans explained in this section therefore illustrate the impact on the fees, although we are not consulting on the level of the fees themselves.

In recognition of the ambitious and long-term objectives we have set for ourselves and in seeking to deliver the strategy as cost-effectively as possible, while this remains a three-year strategy, we propose to smooth delivery over a five-year period. This enables us to achieve the right pace of change with our partners and stakeholders and plan for continuity across strategy periods while achieving the right balance between activity and investment in the medium-term, thereby minimising the impact on fee levels.

We therefore anticipate that our next three-year strategy, which we will consult on in 2028, will be an opportunity to review and refresh this strategy, rather than to determine a new direction. That will require us to re-evaluate the context in which we are working, looking for indicators of change and to respond to any challenges that brings, as well as to check, through engagement with stakeholders, that our direction of travel remains the right one.

### The costs associated with delivering our strategy

We believe that the strategy described above is a necessary and proportionate response to the challenges we and the wider sector are facing and need to respond to. In order to provide transparency about the drivers of the costs of delivery we have set out in the table below the costs associated with each of the strategic objectives over the three year life of the strategy.

Table 1: Proposed expenditure by strategic objective

Objective		2026-2028 (£ million)
1.	Support dental professionals to provide the right care for their patients	£13.2
2.	Get the right people on the registers at the right time	£39.4
3.	Improve fitness to practise, maximising patient safety and reducing unintended impacts	£57.2
4.	Work collaboratively to speak up on, influence, and address issues that affect patients and the public	£12.9
5.	Maximise the effectiveness of our people, our culture and our systems	£27.2
То	tal	£149.9

### Our expenditure plans: assumptions

In order to develop and test our plans we have made some assumptions about our costs and our income.

#### Costs

- The volume of new fitness to practise concerns raised with us will remain at current levels
- We will incur increased costs associated with prosecutions and hearings temporarily
  as a result of our work to clear backlogs at the early stages of fitness to practise
  investigations.
- Initiatives described in this strategy will deliver efficiencies, including our work to modernise our registration processes and more effective use of our estates
- We will deliver an additional 7% efficiency savings over the next five years.
- Our reserves will return to 3 months of operating expenditure by 2030.

#### Income

Register growth will continue in line with long-term trends, noting that recent spikes are not likely to be sustained:

- The number of Dental Care Professionals (DCPs) joining the register from overseas will drop considerably, as a result of dentists with overseas qualifications no longer being able to apply to the DCP register.
- Overseas registration routes, including the ORE, will become fully-self funding.
- Our UK registration routes will remain self-funded via application and assessment fees.

### Apportioning costs between registrant groups

For the purposes of calculating the ARF for both dentists and DCPs, we have, in line with our approach since 2019, determined how our costs were generated (e.g. the cost of investigating fitness to practise concerns for each group). Where is it not possible to directly attribute costs (for example for our premises or our staff in support functions) we have applied the average split of measurable activities. In line with our fees policy, we have sought, as far as possible, to limit cross-subsidy. Given that the DCP category encompasses six professions, some limited cross-subsidy is necessary in order to reduce fee volatility for titles under which small numbers of professionals are registered.

We will be undertaking further work to reconfirm the cost allocation in the coming months to support determination of the fee for 2026.

#### Our expenditure plans: impact on fees for 2026-2028

The expenditure plans outlined above mean that the annual retention fees (ARF) for both dentists and DCPs will need to increase. Because the strategy is currently in draft and subject to consultation, we have provided ranges, rather than absolute figures, for the likely impact on the ARF. We will continue to challenge our assumptions and develop our detailed plans, in order to determine the budget in October 2025.

#### **Dentist ARF**

£690-£705

#### DCP ARF

£105-£115

The anticipated ARF figures, while representing an increase against the current fee, are returning to around the 2020 fee levels of £680 for dentists and £114 for DCPs. This is despite the significant inflationary pressures that the UK has been experiencing for the past five years. By way of illustration, had we adjusted the ARF for inflation on an annual basis since 2020, the current fees would be £845 for dentists and £142 for DCPs. This would be significantly higher than the anticipated range set out above.

One of the key principles of our policy on fee-setting, is to support the workability of the regulatory framework, and this includes limiting volatility in the level of the ARF. In order to reduce the risk of a significant increases in future, and to provide certainty to dental professionals, we plan to assess the impact of inflation (measured as CPI) each year to our financial plans, and to reflect this impact as an 'up to' annual CPI increase in our fees. This does not mean that an increase to fees is inevitable as we will only apply an increase were we are unable to absorb increased costs through our financial efficiency programmes.

We will measure CPI at the end of June each year, in order to reflect any movement in our October decision on fees for the following year.

## Consultation questions

## Please tell us who is responding

- 1. Please tell us if you are responding as an individual or on behalf of an organisation:
  - i. Individual
  - ii. On behalf of an organisation
- 2. If responding as an individual, please tell us which option below best describes you:
  - i. Registered dental professional
  - ii. Member of the public and/or dental patient
  - iii. Dental student or trainee
  - iv. Qualified dental professional applying for registration
  - v. Other not specified
- 3. If responding on behalf of an organisation, please tell us the name of your organisation, your name, job title and contact information (we will only use this information if we need to clarify anything contained in your response, the need to do this is rare):
- 4. If responding as a registered dental professional, please tell us which title(s) you are registered with and if you are on a specialist list:
  - i. Clinical dental technician
  - ii. Dental hygienist
  - iii. Dental nurse
  - iv. Dental technician
  - v. Dental therapist
  - vi. Dentist
  - vii. Orthodontic therapist
  - viii. One or more specialist lists

Questions continue over the page...

## About our proposed objectives and activities

- 5. To what extent do you agree that our strategic objectives are the right focus for the GDC, given the context in which we are operating?
  - i. Strongly agree
  - ii. Somewhat agree
  - iii. Neither agree nor disagree
  - iv. Somewhat disagree
  - v. Strongly disagree
  - vi. Don't know
- 6. Please provide reasons for your answer:

For each of the proposed strategic objectives, please tell us to what extent do you agree that the priorities we have outlined to support delivery will help us achieve the objective

- 7. Objective 1: Support dental professionals to provide the right care for their patients to what extent do you agree that the priorities we have outlined to support delivery will help us achieve this objective?
  - i. Strongly agree
  - ii. Somewhat agree
  - iii. Neither agree nor disagree
  - iv. Somewhat disagree
  - v. Strongly disagree
  - vi. Don't know
- 8. Please provide reasons for your answer:
- 9. **Objective 2: Get the right people on the registers at the right time** to what extent do you agree that the priorities we have outlined to support delivery will help us achieve this objective?
  - i. Strongly agree
  - ii. Somewhat agree
  - iii. Neither agree nor disagree
  - iv. Somewhat disagree
  - v. Strongly disagree
  - vi. Don't know
- 10. Please provide reasons for your answer:

- 11. Objective 3: Improve fitness to practise, maximising patient safety and reducing unintended impacts to what extent do you agree that the priorities we have outlined to support delivery will help us achieve this objective?
  - i. Strongly agree
  - ii. Somewhat agree
  - iii. Neither agree nor disagree
  - iv. Somewhat disagree
  - v. Strongly disagree
  - vi. Don't know
- 12. Please provide reasons for your answer:
- 13. Objective 4: Work collaboratively to speak up on, influence, and address issues that affect patients and the public to what extent do you agree that the priorities we have outlined to support delivery will help us achieve this objective?
  - i. Strongly agree
  - ii. Somewhat agree
  - iii. Neither agree nor disagree
  - iv. Somewhat disagree
  - v. Strongly disagree
  - vi. Don't know
- 14. Please provide reasons for your answer:
- 15. Objective 5: Maximise the effectiveness of our people, our culture and our systems to what extent do you agree that the priorities we have outlined to support delivery will help us achieve this objective?
  - i. Strongly agree
  - ii. Somewhat agree
  - iii. Neither agree nor disagree
  - iv. Somewhat disagree
  - v. Strongly disagree
  - vi. Don't know
- 16. Please provide reasons for your answer:
- 17. Do you have any other comments you would like to make on our high-level objectives or the activity designed to support their achievement that are not covered by your answers to the previous questions?

Questions continue over the page...

### Our expenditure plans

- 18. Thinking about our expenditure plans, please tell us to what extent do you agree that you understand our explanations?
  - i. Strongly agree
  - ii. Somewhat agree
  - iii. Neither agree nor disagree
  - iv. Somewhat disagree
  - v. Strongly disagree
  - vi. Don't know
- 19. Thinking about our expenditure plans, please tell us to what extent do you agree that the assumptions underpinning our plan make sense?
  - i. Strongly agree
  - ii. Somewhat agree
  - iii. Neither agree nor disagree
  - iv. Somewhat disagree
  - v. Strongly disagree
  - vi. Don't know
- 20. Please provide reasons for your answers:
- 21. Do you have any other comments you would like to make on our expenditure plans that are not covered by your answers to the previous questions?

Questions continue over the page...

### Equality, diversity and inclusion

One of our aims when developing this strategy was to deliver on our commitment to ensure that equality, diversity and inclusion are central to our corporate purpose and strategy. We are seeking views on whether our commitment to equality, diversity and inclusion is clearly and appropriately expressed in this strategy.

We are also seeking to understand the extent to which our proposed strategy has the potential to positively or negatively impact on people with protected characteristics.

- 22. To what extent do our objectives clearly describe our commitment to equality, diversity and inclusion?
  - i. Very clearly described
  - ii. Clearly described
  - iii. Somewhat clearly described
  - iv. Not very clearly described
  - v. Not at all clearly described
  - vi. Don't know

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 identified by the Equality Act 2010 are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation
- 23. Please tell us about any impacts you think our proposals could have on people based on their protected characteristics:

#### **Equality monitoring form**

If you are responding as an individual, you will be asked to complete an equality monitoring form. We would like to encourage you to complete it as part of your response.

Those responding on behalf of an organisation will not be asked.