GDC consultation response

DHSC consultation on proposal to enable dental hygienists and dental therapists to supply and administer specific medicines under exemptions

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GDC consultation response to the Department of Health and Social Care (DHSC) consultation:

Proposal to enable dental hygienists and dental therapists to supply and administer specific medicines under exemptions

Consultation question:

Do you agree or disagree with the proposal to amend the Human Medicines Regulations 2021 to enable dental hygienists and dental therapists to supply and administer specific medicines under exemptions?

This would include specific prescription only medicines, as well as all general sales list and pharmacy medicines in their scope of practice.

If you have evidence to support your answer, please provide details.

GDC response:

We agree. These proposals would help dental therapists and dental hygienists to access their full scope of practice under appropriate direct access arrangements, and with the appropriate training, competence and indemnity cover. This is in line with GDC’s Scope of Practice guidance.

The GDC’s role in relation to training is misrepresented in the proposals. We do not have a specific statutory role for quality assuring dental training programmes other than those leading to registration or joining a specialist list. Therefore, the entry requirements, design, and approval of post-graduate training programmes for access to exemptions would not be matters for us. However, we would at an appropriate time in future consider if exemptions training could be integrated in hygiene and therapy training courses leading to registration, as this directly applies to the learning outcomes which we set for UK pre-registration education and training programmes to deliver.

Consultation question:

Do you agree or disagree with the proposal for regulating use of exemptions?

If you have evidence to support your answer, please provide details.

GDC response:

We agree, as the proposals fit with the GDC’s regulatory approaches around professionalism and fitness to practise.

GDC registrants must practise in accordance with Scope of Practice guidance. The proposals align with our expectation that dental therapists and dental hygienists should consider whether any particular activity - in this case, use of exemptions - is in their individual scope of practice, based on their training, competence and indemnity cover.

GDC registrants must follow GDC Standards. Standard 1.9 is specifically referenced in proposals. Additionally, we would expect the overall effect of the Principle to ‘put patients’ interests first’ to be that professionals use exemptions only when in the patient’s best interests.
GDC registrants must keep their professional knowledge and skills up-to-date through CPD, in line with GDC requirements. We would expect dental therapists and dental hygienists to consider their individual CPD needs around the use of exemptions, in the same way as they would around any other aspects of their professional practice.

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