GDC consultation response

Welsh Government consultation:
Mandatory Licensing of Special Procedures in Wales

Dated: 19 April 2023
GDC response to Welsh Government Consultation:
Mandatory Licensing of Special Procedures in Wales

Background

The General Dental Council (GDC) is the UK-wide statutory regulator of over 114,000 members of the dental team, including over 43,000 dentists and 71,000 dental care professionals (DCPs). In Wales we regulate around 22,700 dental professionals.

An individual must be registered with the GDC to practise dentistry in the UK. Unlike other health professional regulators, we register the whole dental team, across the four nations of the UK, including dental nurses, clinical dental technicians, dental hygienists, dental technicians, dental therapists, orthodontic therapists and dentists.

Our primary objective is to protect the public, and in doing so to:

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

All patients should be confident that the treatment they receive is provided by a dental professional who is properly trained, qualified, and meets our standards. To achieve this, we register qualified dental professionals, set standards for the dental team, investigate complaints about dental professionals' fitness to practise, and work to ensure the quality of dental education.

Consultation response

The GDC agrees that the dental professionals that we regulate should not have a blanket exemption for all four special procedures, and that any exemption would only apply to procedures that are performed as an adjunct to the provision of dentistry.

The GDC’s view that GDC registered dental professionals should not have an exemption from requiring a special procedure licence to perform electrolysis, body piercing and tattooing, as these are not procedures that are performed as an adjunct to the provision of dentistry.

Acupuncture is a procedure that is used by some dental practitioners to support the provision of dentistry, for example to assist with the management of pain during dental treatment.

Whilst acupuncture itself is not the practice of dentistry, and is therefore not explicitly considered as part of the Scope of practice of dental professionals, there are currently no regulatory restrictions on the use of acupuncture to support dental treatment.

However, a dental professional performing any procedure in the provision of dentistry, or by virtue of being a GDC registered dental professional, must follow the standards for the dental team, as well as other GDC guidance and authoritative clinical guidance. Among other things, dental professionals must work within their knowledge, skills, professional competence and abilities. They must also have indemnity or insurance arrangements in place that permit them to undertake all of the tasks that they do at all of the locations they work in.
The GDC would support an exemption to the requirement to obtain a special procedure licence to perform acupuncture in Wales, where this procedure is being carried out as an adjunct to the provision of dentistry. The dental professional must be trained, competent and indemnified to carry out this procedure. As per the requirements set out in the consultation document, the procedure must be performed within the National Health Service or privately regulated healthcare service regulated by Healthcare Inspectorate Wales (HIW), and the exemption would no longer apply if the procedure was to be carried out separate from the provision of dentistry, or in an alternative location to that in which the dental treatment is provided.

Please do not hesitate to contact me should you have any questions regarding this response, or for any further clarification on this position.

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Executive Director, Strategy

19 April 2023