General Dental Council

Costed Corporate Plan 2023 – 2025



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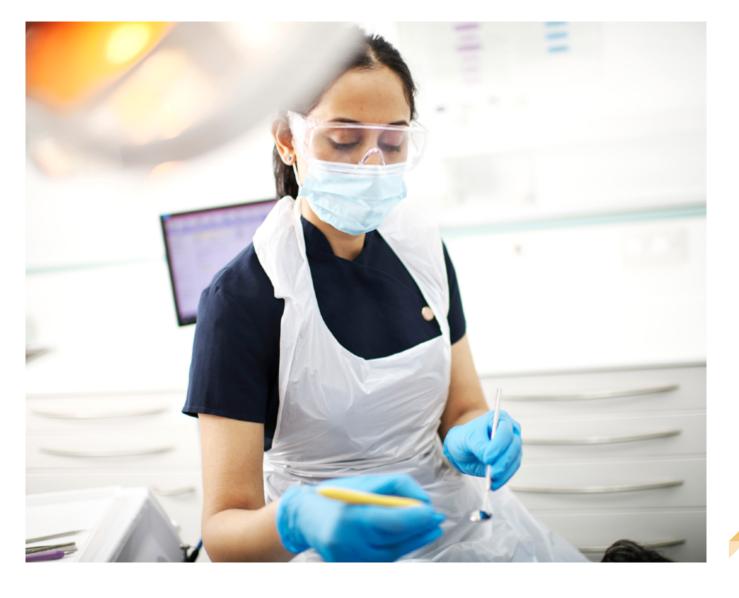
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# 1. Foreword from Chief Executive and Registrar

The GDC is the UK-wide statutory regulator of around 115,000 members of the dental team, with the primary roles of protecting the public and ensuring that they have confidence in the services provided by dental professionals.

Our Costed Corporate Plan (CCP) sets out what we will do over the next three years, the fees that we charge, and includes our forecast of income and expenditure for 2023, as well as reporting on our progress in 2022.

In 2022 we monitored our planned activity to ensure that we continued to deliver our statutory purposes. This was challenging and the delivery of some of our activities was simply too slow in 2022. The main causes of this were shortfalls in staff capacity and capability. We experienced high levels of sickness as pandemic restrictions were lifted, disrupting our work, and found ourselves carrying high numbers of vacancies, particularly in Registration. We took action to address this and filled the vacancies over the year but, whilst we have now trained the staff we recruited, they are less experienced than those they replaced, and it will take time for that experience to develop and for them to become fully effective.

Notable deliveries in 2022 included the launch of the Dental Professionals Hearings Service, to further highlight the independence of the hearings function from our investigation and prosecution functions and to improve the experience for all who attend a hearing. We also consulted on proposed changes to learning outcomes and behaviour expectations for education and training programmes leading to registration, introducing the term 'safe practitioner' to describe newly qualified dental professionals.

To enhance our operational effectiveness and efficiency, we completed the work to replace our finance system, with the new system going live in early January 2023. We also continued to improve and upgrade our IT and telecommunications infrastructure.

We consulted on our new Corporate Strategy for 2023 – 2025, which was approved by Council in October. All of the activities in the plan have been reviewed and mapped across to the new strategic aims. Council also approved an increase to the Annual Retention Fee (ARF) which was far below the rate of inflation at the time, and lower than we indicated when we consulted on it.

Despite the changing priorities, we have been able to deliver much of what we set out to do at the start of the year. Our plan for 2023 – 2025 will enable us to continue to deliver against our regulatory remit.

#### Ian Brack

Chief Executive and Registrar

# 2. Corporate Strategy 2023 – 2025

Our Corporate Strategy for 2023 – 2025 builds upon the strategic aims and objectives of <u>Right time</u>, <u>Right place</u>, <u>Right touch</u>. We have revisited and clarified those aims to make sure they remained the right priorities in the context of the pandemic and wider landscape.

Our role in public protection remains unchanged, while our strategy recognises that we need to modernise, and improve our performance in some areas.

This Corporate Strategy sets out our further steps to continue to move the balance of our effort towards prevention in a different context of public protection, dental care and regulation. We begin the implementation of this strategy facing a number of challenges:

- The delays and uncertainty over the plans to reform the health professional regulators, which is an essential component to achievement of our ambition.
- Changes to our routes to registration following the UK's departure from the EU.
- Economic uncertainty that affects patient choice, dental businesses, individual dental professionals and the GDC.

Flexibility and adaptability will be essential for us to respond to uncertainty and this strategic plan builds in agility to be able to respond to a changing set of circumstances.

We will continue to press for the opportunities that legislative reform may bring, but it cannot be guaranteed and will not resolve all existing issues. Therefore, we will drive improvements within our current constraints while supporting and empowering the dental team to deliver safe and effective dental care to high standards of professionalism.

Whatever context we face, our purpose remains constant: to protect the public.

At the core of what we do is ensuring that the register is maintained so that the public only receives dental care from safe and effective dental professionals. Flowing from this central task are our functions and processes, which we perform on behalf of members of the public and in co-operation with the professions, the sector, and other regulators. We will continue to perform these functions and processes and make them more efficient and effective.

Therefore, while we are building in flexibility into how we achieve our aims, they will be familiar to our stakeholders and reinforce understanding of our role and goals.

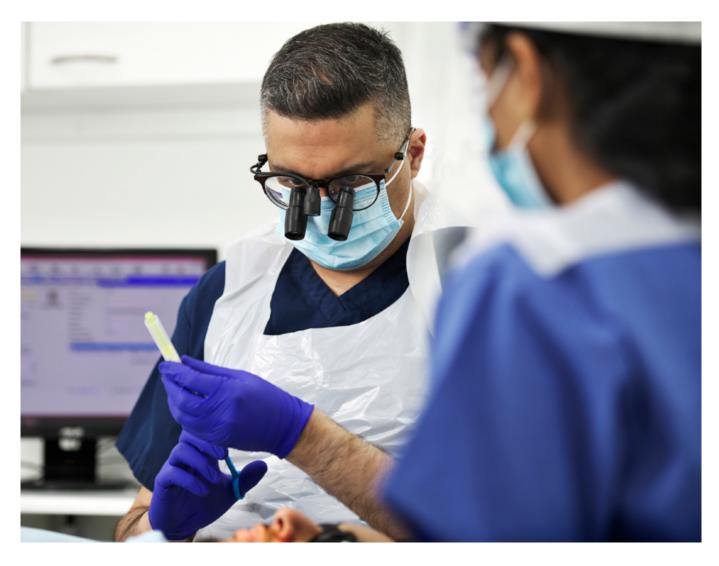
Integral to the achievement of our new strategy are our four new strategic aims. All our activity is aligned with one or more of these aims:

Strategic aim	Description		
1	Dental professionals reach and maintain high standards of safe and effective dental care.		
Concerns are addressed effectively and proportionately to protect the public professional learning.			
3	Risks affecting the public's safety and wellbeing are dealt with by the right organisations.		
4	Dental professional regulation is efficient and effective, and adapts to the changing external environment.		



Underpinning the Corporate Strategy are several areas of priority that contribute to the achievement of our strategic aims. These are:

- **Effectiveness of the GDC:** Our approach to ensuring the GDC has the staff, systems and processes to improve our performance and support the achievement of our strategic aims and objectives.
- Preventative regulation (formerly known as Moving Upstream): Our approach to moving effort towards prevention of harm through our regulatory functions and processes, use of data, research and intelligence and work with our stakeholders.
- **Communications and engagement:** Our approach to supporting understanding of our role in the dental sector, our priorities and, where appropriate, involving the people affected by our work in the development of our regulatory functions and processes.
- **Evidence, data, and research:** We have two approaches, the first is to use the data we hold more effectively, within the context of our legal obligations. The second, is to use research and evaluation to inform our regulatory functions, processes and improvements to our performance.
- **Equality, diversity and inclusion:** Our objectives to foster equality, diversity and inclusion inside our organisation, with the sector we regulate, and with the public.



## 3. Review of the 2022 Plan

The Costed Corporate Plan (CCP) for 2022 was the last year of the 2020 – 2022 strategy.

It was designed to be flexible and to facilitate changes to the detail and profile of the plan throughout the year as priorities changed. Working in a new post-lockdown environment there were several factors that influenced the delivery of our planned work.

We experienced high levels of sickness as pandemic restrictions were lifted, disrupting our work. We also struggled with high numbers of vacancies as staff left the GDC and we continued to encounter significant difficulties in promptly replacing them. We took action to address this and over the year dealt with the staff shortfalls, but the staff we recruited are, of course, less experienced than those they replaced.

Throughout the year we monitored our planned activity to determine whether we continued to deliver our statutory purpose, maintaining patient safety and public confidence. This was challenging and the delivery of some of our statutory processes was impacted in 2022. The paramount causes of this were shortfalls in staff capacity and capability, which had an impact on our ability to deliver business as usual activity as well as projects across the year.

We regularly reviewed and monitored the CCP to ensure that high priority work was resourced, supported and delivered. This resulted in a number of revisions to the plan for 2022 to ensure effective delivery, which are detailed below.

### 2020 - 2022 strategic aims

Strategic aim	Description				
1	Career-long upstream regulation that upholds standards for safe dental professional practice and conduct.				
2	Resolution of patient concerns at the right time, in the right place.				
3	Right-touch regulatory decision-making for our enforcement action.				
4	Maintaining and developing our model of regulation in preparation for reform of our legislation.				
5	An outcome-focused, high performing and sustainable organisation.				

## 2022 CCP project summary

Status	Strategic aim 1	Strategic aim 2	Strategic aim 3	Strategic aim 4	Strategic aim 5	Total
On track or completed	13	1	9	3	22	48
End date moved	6	0	1	0	6	13
On hold	0	0	0	0	0	0
Stopped	1	0	4	0	9	14
TOTAL	20	1	14	3	37	75



At the beginning of the year there were 73 projects on our workplan for 2022, and an additional two projects were added during the year.

Of these 75 projects:

- 18 projects were completed.
- 30 projects are in progress and remain on track for delivery in 2023 or 2024.
- 13 projects had their end dates moved, due to changes in resource availability, scope and schedule.
- 14 projects were stopped and removed from the plan. Of these five were combined with other projects, two were moved into business as usual activities and seven were cancelled as they were either no longer relevant due to changes in the landscape or deprioritised due to other activities on our workplan.

### **Unplanned work undertaken in 2022**

Whilst the level of unplanned work in 2022 was less than previous years, there were still several areas where we were required to complete significant areas of work that were not planned for at the start of the year. These included:

#### **Specialist Lists Assessed Applications (SLAA) process**

Previously, all SLAA applications we received to join a specialist list were referred to the relevant Specialist Advisory Committee (SAC) to access and make a recommendation on whether the dental professional demonstrated an equivalence to a UK Certificate of Completion Specialist Training (CCST). They would then be admitted to the applicable specialist list.

Due to ongoing issues and delays with the processing of these applications, we decided to move this activity in-house, to improve the overall process and our timeliness. Following stakeholder engagement, work commenced in late 2022 to expedite this process. We aim to start assessing these applications inhouse later this year.

#### Regulatory Reform

Despite uncertainty over both timetable and scope, preparing for regulatory reform continued to require significant staff time throughout 2022. This included working with the DHSC and other regulators. Due to the continuing uncertainty, we initiated work to consider what we could change within the framework of current legislation. This work will continue in 2023.

## Achievements and progress in 2022

Detailed below are some of the key areas of work progressed or completed and projects implemented in 2022:

#### **Dental Professionals Hearings Service**

We created a new identity and name for our hearings service and launched the Dental Professional Hearings Service in June 2022. This further highlighted the independence of the hearings function from our investigation and prosecution functions and improved the experience for all who attend a hearing. All communications relating to a hearing now come from the Dental Professionals Hearings Service, which has its own dedicated hearings website, where all the information relating to dental hearings can be found in one place.

Since its launch we have sought feedback from users and stakeholders, and work continues to make further improvements to the hearings service based on the feedback received. Improvement work completed in 2022 included ensuring that the service was accessible, and that our communications were clear, concise and appropriate in tone to all parties.



#### **GDC Corporate Strategy 2023 – 2025**

We developed and consulted on our new Corporate Strategy for 2023 – 2025, which was approved by Council in October 2022. Extensive stakeholder engagement activity took place throughout 2022 to inform our strategic ambitions and priorities. This work was undertaken in tandem with the development of our Costed Corporate Plan for 2023 – 2025 to ensure the work we had planned was aligned with our strategic direction.

#### Tone of voice of our communications

Ensuring our communications are effective and appropriate for each of our audience groups remains a priority for us. We wanted to ensure our communications were appropriate and relevant to different audience groups, and knew we needed to improve our tone of voice. All GDC staff received training on writing styles, the use of plain English and using different language for different audiences and channels.

This change has been well received, and work will continue in 2023 to further improve our tone of voice, with a particular focus on fitness to practise.

#### Paperless registration - UK

Work commenced to develop a paperless registration process. This included a review of our existing process, and following an analysis of potential solutions and providers, we sourced solutions to deliver this. We anticipate that this service will be launched in 2024. Once the service is launched for UK applications, we will begin work to understand how we can effectively offer a paperless process for overseas applications.

#### **International registration**

We worked closely with the DHSC to progress the legislative changes needed to remove unnecessary constraints on how the overseas registration examination (ORE) is run, and to provide greater flexibility in how we ensure that overseas qualified dental professionals meet the required standards to practise in the UK. The new legislation took longer than we had hoped, eventually coming into effect in March 2023. However, many of the changes will not come into effect or have any impact until after March 2024. This will have consequences for the GDC as the existing arrangement remained in place for longer than we had hoped. Work on this will continue in 2023.

We continued to run the ORE throughout 2022, and worked collaboratively with our providers to ensure we were able to confirm examination dates as soon as it was safe and feasible to do so. This enabled us to prioritise the exam invitations to those candidates who were nearing the end of their five-year window.

#### Implemented additional back office systems to improve organisation efficiency

Back office systems are critical to our operational effectiveness and efficiency. We implemented several new back-office systems in 2022. We replaced our finance system and continued to improve and upgrade our IT and telecommunications system infrastructure and upgraded our meeting rooms to improve the effectiveness of our hybrid multisite meetings.

#### Assuring the quality of education and training programmes

In 2022, we carried out reviews and inspections of education and training programmes. During the academic year August 2021 – July 2022 we granted approval to four new programmes, quality assured six dental care professional education providers and six awarding organisations through monitoring, and carried out targeted monitoring of 15 dentist/BDS programmes and 15 dental hygiene and therapy programmes.

#### Safe Practitioner consultation

In late 2022, we consulted on proposed changes to learning outcomes and behaviour expectations for education and training programmes leading to registration. This was important as the learning outcomes were last reviewed in 2015, and we have seen significant shifts in both dentistry and wider society since then. The proposed changes reflected these shifts and included the introduction of the term 'safe practitioner' to describe newly qualified dental professionals.



# 4. Work programme for 2023 – 2025

Detailed below is our work programme for 2023 – 2025.

Our planned activities have been reviewed and mapped across to the new strategic aims. As with last year, whilst we recognise that some projects will contribute to multiple strategic aims, we have allocated projects to a single aim.

A target year is provided for each project, indicating when it is scheduled to be completed. These timings are based on the information available during the planning period (Q4 2022) and are subject to a changing external environment and organisational priorities.

There are 57 projects in the 2023 – 2025 work programme, with 52 projects on the workplan for 2023. Of these 52, 32 are 'flow through' projects that started in previous years, and 20 are new projects that will start in 2023.

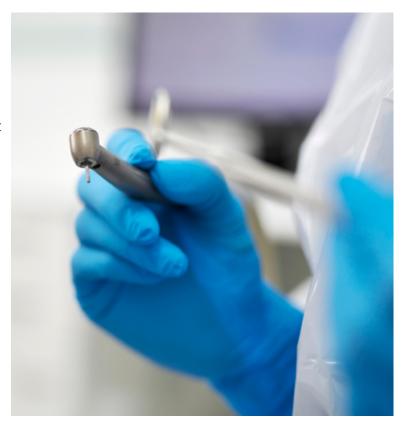
Of the 57 projects on the work programme, 27 are due to complete in 2023, 20 in 2024, five in 2025 and five where the end date is not yet detailed or is after 2025. Three of these projects have yet to have start dates determined, as these are reliant on legislative change and subject to external timelines.

We continue to focus on ensuring that dental regulation is efficient and effective and adapts to the changing external environment (new strategic aim four). This aim is focused on the organisation and how we perform, ensuring we have the right systems, processes, and technology in place. Improved effectiveness and efficiency should free capacity and enable us to shift more of our resource towards upstream regulatory efforts which anticipate and address potential public protection issues before they become problems.

It should be noted that the CCP only details the project work we plan to complete and does not include all our normal business as usual (BAU) activity that we undertake to ensure that we are able to deliver against our regulatory remit of ensuring public safety and public confidence in dental services. The cost of this BAU activity is included in the financial information, detailed in section 5.

This BAU activity includes our Registration and Customer Service teams, Fitness to Practise functions, Strategy, and the wider support functions. The costs for these BAU activities have been allocated to the relevant strategic aim, along with the project costs to provide a total cost breakdown, by strategic aim, for all the planned work and activities over the next three years.

Details of the forecast expenditure by strategic aim can be found in section 5.



### Details of individual projects on the 2023 – 2025 workplan, by strategic aim and year of completion

## Strategic aim 1

Dental professionals reach and maintain high standards of safe and effective dental care.

#	Strategic aim 1 projects due to complete in 2023
1.1	Expectations of a safe practitioner
1.2	Revise and approve specialty curricula
1.3	Specialist list assessed application
1.4	CPD audit
1.5	Annual Renewal - DCP and dentist annual renewal projects
#	
π	Strategic aim 1 projects due to complete in 2024
1.6	Principles of professionalism
1.6	Principles of professionalism
1.6	Principles of professionalism  Develop our understanding of the impact of differing indemnity models on regulation
1.6 1.7 1.8	Principles of professionalism  Develop our understanding of the impact of differing indemnity models on regulation  Scope, develop and implement revised international registration processes
1.6 1.7 1.8	Principles of professionalism  Develop our understanding of the impact of differing indemnity models on regulation  Scope, develop and implement revised international registration processes

## Strategic aim 2

Concerns are addressed effectively and proportionately to protect the public and support professional learning.

#	Strategic aim 2 projects due to complete in 2023
2.1	Develop a comprehensive complaints resolution model
2.2	Fitness to Practise (FtP) KPIs redesign
2.3	Regulatory seriousness research
2.4	Strengthen the separation of the adjudication function
2.5	Using data to embed improvements
#	Strategic aim 2 projects due to complete in 2024
2.6	Provision of legal services in relation of FtP cases
2.7	Software for empanelment and hearings procedure
#	Strategic aim 2 projects due to complete in 2025
2.8	FtP decision making guidance

## Strategic aim 3

Risks affecting the public's safety and wellbeing are dealt with by the right organisations.

#	Strategic aim 3 projects due to complete in 2023
3.1	Tone of voice of our communications phase 3
#	Strategic aim 3 projects due to complete in 2024
3.2	Digital communication improvements

There are no strategic aim 3 projects due to complete in 2025

## Strategic aim 4

Dental professional regulation is efficient and effective, and adapts to the changing external environment.

#	Strategic aim 4 projects due to complete in 2023
4.1	Effective associates
4.2	FtP management of and process improvement related to FtP policies
4.3	GDC data strategy
4.4	Implement new GDC data warehouse and self-serve reporting for CRM data source
4.5	Implement new procurement and contract management process
4.6	IT systems analysis 2023
4.7	Optimisation of GDC estate
4.8	Paperless registration operations - phase 1
4.9	Records management - information audit
4.10	Replace credit card processing systems
4.11	Update financial processing and management systems
4.12	Upgrade of project online
4.13	Associates review
4.14	CCP planning process - CCP 2024 - 2026
4.15	Re-tender for external legal advisors
4.16	Annual Report and Accounts

#	Strategic aim 4 projects due to complete in 2023
4.17	Banking provider tender
4.18	Case Management and operational improvements to hearings process
4.19	Expand GDC data warehouse and self-serve reporting for additional data sources
4.20	Improving communications and support
4.21	IT Hardware, infrastructure & peripherals upgrade
4.22	Operational review of finance system following system implementation
4.23	Paperless registration operations - phase 2
4.24	Review and improve the intranet
4.25	SharePoint document management
4.26	SharePoint upgrade
4.27	Total reward
4.28	UK registration paperless
4.29	Windows 11 upgrade rollout
#	Strategic aim projects due to complete in 2025
4.30	Applications fees review for strategy cycle
4.31	Non-UK registration paperless
4.32	Workforce development

There are five projects that will be started in the 2023 – 2025 period but do not at this stage have their planned completion dates confirmed or will complete after 2025. These are:

Project name	Strategic aim
Operationalise CPD reforms	1
ORE Part 2 tender	1
ORE post legislation	1
Response to legislative data protection changes	4
DB Pension scheme buyout	4

## Projects added to the 2023 workplan - March 2023

Three additional projects were added to the original 2023 workplan following a review of our activity in Quarter 1 2023.

The projects added to the plan following this review are included in the projects detailed above and are Associates review (4.13), Optimisation of GDC estate (4.7) and Tone of voice of our communications phase 3 (3.1)

One project was removed from the plan which was the IT systems analysis.



# 5. Forecast expenditure and income

### Forecast expenditure by strategic aim 2023

The total forecast expenditure for three year period from 2023 to 2025 is £125.8m, compared with the agreed budget for 2022 of £124.2m, which is an increase of 1.3%. This is due to the increased resource requirements across our support services as part of our ensuring compliance and inflationary pressures.

The total 2022 provisional outturn is £37.8m, which is an underspend of £3.5m. The reasons for this underspend are:

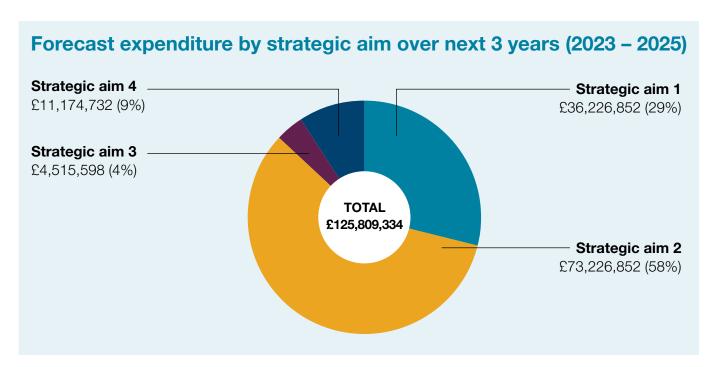
- Additional income received from an increased volume of registration applications received over the course of the year.
- An underspend in our staff cost budget due to unplanned staff vacancies and increased recruitment lead times throughout the year. This further impacted on our ability to deliver planned work.
- An underspend in our legal team activity as a result of the deferred activity in the Fitness to Practise process, which was due to staff vacances that resulted in lower levels of referrals to our ILPS and ELPS teams.

The breakdown of forecast spend by strategic aim includes both the CCP project activity detailed previously, in addition to the normal business as usual work and operational activities that are completed across the GDC throughout the year.

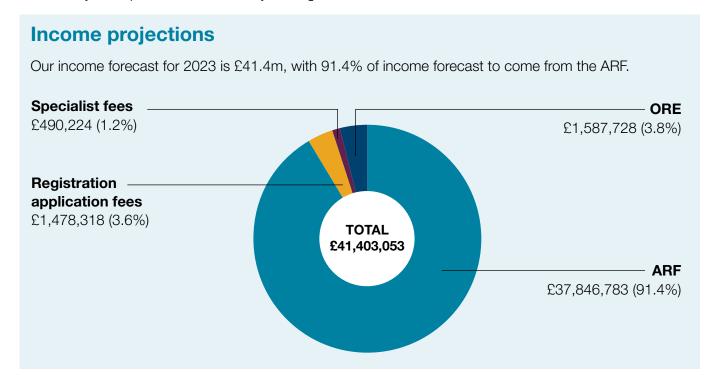
We are unable to compare the 2023 forecast by strategic aim with 2022 as the strategic aims have changed. We will be able to provide this information in future reports.

The forecast budget for 2023 is £43.0m.

#	Strategic aim	Initial 2023 forecast (£)	% of total
1	Dental professionals reach and maintain high standards of safe and effective dental care	11,802,718	27%
2	Concerns are addressed effectively and proportionately to protect the public and support professional learning	26,602,602	62%
3	Risks affecting the public's safety and wellbeing are dealt with by the right organisations	1,065,804	3%
4	Dental professional regulation is efficient and effective, and adapts to the changing external environment	3,551,652	8%
TOT	AL	43,022,776	100%



The three-year expenditure forecast, by strategic aim, for 2023 to 2025 is £125.8m.



The three-year income projection for 2023 to 2025 is £124.2m

## **Reserves policy**

Our <u>reserves policy</u> has been designed to ensure that we retain our financial viability to maintain our statutory purpose and functions. It recognises our financial risk exposure and ensures that we have adequate levels of working capital throughout the year.

We have aligned our budget expenditure, income and reserves target to our corporate strategy. Our reserves policy is reviewed annually by Council and was last considered in October 2022.



## **Annual Retention Fee (ARF)**

The ARF level has been set to align to our forecast of activity, expenditure and reserves. We have worked to ensure that we have removed cross subsidy, where possible, so that the cost of regulation is borne by those most closely associated with that activity.

#### Our fee-setting policy established three key principles:

- 1. Fee levels should be primarily determined by the cost of regulating each registrant group.
- 2. The method of calculating fee levels should be clear.
- 3. Supporting certainty for registrants and the workability of the regulatory framework.

# In October 2022 Council set the ARF levels for the next three years, subject to any unforeseen circumstances:

- Dentists £690
- Dental care professionals £114

If high inflation is sustained, Council will consider if the fees should increase in 2024 and 2025 but any such increase will, at most, be in line with the rate of inflation at the time, or as a result of other exceptional and unanticipated circumstances.

### First registration application fees

This is made up of two parts, a processing fee currently set at £36.33, with an additional variable rate dependent on the complexity of the application assessment.

## Specialist fees

We apply a fee for initial applications for entry to specialist lists, which is £345 (per specialty). There is then an annual specialty retention fee of £72 (per specialty).

## **Overseas Registration Examination (ORE)**

The ORE is an exam that overseas qualified dentists have to pass in order to register with the GDC. It is made up of two parts, a written exam, with a fee of £806 and a clinical exam, with a fee of £2,929.

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