

The General Dental Council's (GDC) consultation on updating its Scope of Practice guidance

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Scope of Practice: your views on updated guidance

This consultation proposes revisions to the General Dental Council's (GDC) Scope of Practice guidance. The proposals focus on the boundaries of each dental professional role and represent a move away from a detailed list of tasks. Within these boundaries, each dental professional has a responsibility to make an assessment of their scope of practice based on their training, competence, and indemnity cover.

Our proposals are based on an extensive review of the guidance which included independent research and stakeholder engagement, including with dental professionals, patients and the public, professional associations, indemnifiers, and organisations involved in dental education. Much of the content for the proposed revised guidance was produced in partnership with stakeholders.

We invite everyone with an interest in how dental professionals are regulated to share their views.

About this consultation

This consultation survey has 14 questions, which start on page 9. We would encourage all respondents to read the information in the consultation before answering the questions.

A copy of the updated guidance we are consulting on can be found here: [proposed updated Scope of Practice guidance](#).

The current version of the guidance is on our website: [Scope of Practice](#)

Foreword

The GDC has been reviewing the Scope of Practice guidance and we are proposing an approach that better supports professional decision-making. We have been exploring how we can provide the dental team with the right level of guidance and the space needed to make informed judgements relevant to the situations they encounter in practice. We have made commitments to these aims in our [Corporate Strategy 2023–2025](#), and the proposed revised Scope of Practice guidance is the first of a series of consultations we will be running across 2023 and 2024 to help us to meet them.

The changes we propose in this consultation are part of a wider ambition to promote professional behaviours, skills, and attributes across dentistry. We continue to take steps to maintain and improve patient safety by moving dental regulation towards preventing harm rather than responding to the consequences of it. A key part of this move is to foster a system that supports and encourages professionalism and decision making that is centred on the best interests of patients.

We recognise that there will be a range of views from dental professionals - and from others with an interest in dentistry - about the proposed changes. We want to test the draft guidance and to hear views from everyone, including dental professionals, organisations we work with, and the patients and public we have a duty to protect. We have engaged with professionals

and patients in the development of these proposals. This consultation is an opportunity to further engage and gather feedback that will help us to develop guidance that is fit for purpose in the context of modern dentistry and supports good patient care.

About the GDC and our role in setting guidance

The core objective of our regulatory activities is public protection. This is a role given to us by Parliament and set out in the Dentists Act.

To protect the public, our work is focused on the following four areas. We:

- set and support standards in dental education and practice.
- maintain a register of dental professionals who meet our standards.
- ensure that nobody is admitted to that list if they do not meet the relevant requirements.
- take action if any dental professional falls short of our standards.

Our role and functions are set out in legislation. The objectives set for us by Parliament are at the core of everything we do and in some areas of our work the legislation also prescribes, in some detail, how we should deliver those objectives.

The GDC is required to set guidance about the standards of conduct, performance, and practice required of dental professionals. We are also required to consult specific groups of people and organisations before issuing or updating guidance. This includes representatives of dental patients, dental professionals and providers of dental services. This consultation meets these requirements.

There is no requirement for the guidance to be in a particular format. This means we can provide this guidance in a way that we consider will work best for the profession, improve patient outcomes, and maintain public confidence in dentistry. We recognise that individuals will have different preferences for the degree of detail, prescription, and direction the GDC provides through guidance.

Responding to the consultation

The consultation will run for 12 weeks from 16 February 2023 to 11 May 2023. Alongside the open consultation, we will also provide opportunities for voices to be heard through engagement events.

Respondents are invited to share their views on all or some of the questions. If you are using our [online platform](#) to submit your views, it is possible to save progress and return to it later to complete. You can also save and print your response once you have submitted it via the online platform. Alternatively, you can send your responses to the questions in this consultation paper via email to stakeholder@gdc-uk.org or post it to the GDC's head office at 37 Wimpole Street, London, W1G 8DQ.

About your response

Details of your response may be included in our consultation outcome report, including attribution to organisations. Your response may also be subject to publication as a result of a [Freedom of Information](#) (FOI) request.

We ask for contact details from those responding to the consultation only for the purposes of asking questions about your response. The need to do this is rare. The names and personal contact details of those responding will not be included in our outcome report and will not be published as part of a FOI release.

We're asking individuals who respond to provide details of any protected characteristic voluntarily. This information is not connected to your response and is aggregated for analysis and reporting. Providing this data is extremely helpful, and we would like to encourage respondents to complete this step. We cannot assess whether we are being fair and inclusive without these responses.

You can find out more about how we collect, store, and process information in our [Privacy notice](#).

Why we are consulting

We are consulting to inform our proposal for the proposed updates to the Scope of Practice guidance. We will do this by collecting, analysing, and responding to the views of patients and the public, dental professionals, their representative organisations and education and training, funding, employing, and contracting bodies across the four nations of the UK.

What we are consulting on

We have proposed changes to the Scope of Practice guidance following research and engagement which we describe in further detail within this consultation. The proposed updated guidance is on the GDC's website here: [Proposed updated Scope of Practice guidance](#).

The changes to the guidance aim to provide dental professionals with clear boundaries around their role while also enabling professionals who are trained, competent, and indemnified to safely expand their scope of practice within those boundaries. The revised guidance will also help professionals understand the boundaries of other roles within the dental team, to promote team working.

This consultation includes the following areas:

Section 1: Overview of the Scope of Practice guidance

Section 2: The Scope of Practice review

Section 3: Scope of Practice review objectives

Section 4: Research and evidence

Section 5: Meeting the review objectives

Section 6: Consultation questions

Section 7: Equality, diversity, and inclusion

If you have any questions about the consultation, or would like the consultation in another format, please contact stakeholder@gdc-uk.org.

Methodology

This consultation consists of 11 questions. The questions are a mixture of scale and open questions. Respondents do not have to answer all questions.

We will use descriptive statistics to analyse the scale questions, including sub-group analysis if appropriate. Responses to the open questions will be analysed thematically to identify key areas of interest. When analysing and reporting on the data we will take into account whether responses are from an individual or an organisation.

Section 1: Overview of the Scope of Practice guidance

The GDC introduced the Scope of Practice document in 2009 to coincide with the inclusion of several Dental Care Professional (DCP) roles onto the GDC's registers. As these groups were new to professional regulation, Scope of Practice was introduced to give clear guidance on the distinction between each professional role we register, and the boundaries of each role. The current Scope of Practice guidance can be found on our website: [Scope of Practice guidance](#).

Scope of practice of individual members of the dental team

For dental professionals, the fundamental purpose of the Scope of Practice guidance is to help them assess whether they can safely respond to the needs of a patient. Dental professionals must be confident that they are acting within the scope of their role appropriate to their professional title. In addition, they must also assess whether in relation to a particular task or activity they are personally:

- competent,
- trained, and
- indemnified.

If the answer is no to one or more parts of this assessment, the activity is outside of the individual professional's scope of practice even if it is potentially within the scope of practice appropriate to their professional title.

Scope of practice associated with professional title

The current Scope of Practice guidance provides details regarding:

- Areas of practice that have commonly been taught within a professional's core training and are likely to be within a professional's scope if they have kept their skills up to date.
- Areas of practice which might be developed later in their career as part of professional development ('additional skills'), and
- Areas of practice which are outside of the boundaries of the professional role.

The guidance was last reviewed in 2013 alongside the [Standards for the Dental Team](#) and took into consideration the introduction of [Direct Access](#). The updated guidance was expected to benefit patients by clearly outlining the roles of dental professionals and what they could do, and could not do, in the absence of a dentist. It also provided clear guidance on when a patient may be able to seek direct care from a DCP.

Section 2: The Scope of Practice review

Issues with the current Scope of Practice

We have identified three key issues with the current Scope of Practice guidance that we intend to better address with the proposals:

- The Scope of Practice document is widely interpreted by the professions as a comprehensive, rather than indicative, list of tasks for each of the DCP groups. This interpretation can limit and restrict practice as the guidance has been viewed as a 'permission sheet' of tasks that may or may not be undertaken.
- The guidance has not kept up to date with DCPs seeking to expand their scope and contribute to greater skill mix within their teams.
- The guidance has not kept pace with societal and technological changes, and other advances in dentistry.

The revised Scope of Practice guidance

To address these issues, the changes proposed to *the Scope of Practice* guidance are to move the focus away from providing a list of tasks. The revised *Scope of Practice* guidance provides professionals with guidance that helps them to determine what is in their personal scope of practice. This supports patient safety as professionals work within clear boundaries.

Additionally, the proposed updated guidance is focused on the future of dentistry and enables professionals to expand their scope of practice within the boundaries of their role where it is safe to do so. The proposed revised Scope of Practice guidance can be accessed here: [proposed updated Scope of Practice guidance](#).

Patients may encounter different experiences when being treated by dental teams across different settings, as individuals' roles expand within professional boundaries. It is important that patients know what to expect from the professionals involved in their dental care. We will work with patient groups to provide patient-facing information about the different roles within the dental team.

Section 3: Scope of Practice review objectives

In response to the issues identified with the current Scope of Practice guidance, we began a review of the guidance with an extensive research and engagement exercise. The aim of the review was to develop guidance based on the following objectives:

- **Centred on protecting patients** - protects patients by guiding dental professionals to practise safely within clear boundaries of their role.
- **Supportive and guiding** - supports and guides professional decision-making.
- **Enabling** - enables the dental team and individuals to work to their full potential in a variety of different settings.
- **Flexible** – sets role boundaries while also adaptive to the ever-changing environment of dentistry.
- **Futureproof** – supports the delivery of dentistry of the future.

Section 4: Research and development

Stage one: Understanding how the Scope of Practice is used

We carried out a three-stage review of the Scope of Practice guidance.

At the first stage of the review, we wanted to fully understand how the Scope of Practice is being used by dental professionals, other organisations, and the GDC to determine whether it is fit for purpose. In 2019, we commissioned independent research and the results were published in the [Scope of Practice Review](#). The key findings of the research informing this consultation were:

- The Scope of Practice document is not being used in the way that it was originally intended. Education and training providers, employers, and professional representative bodies frequently use the Scope of Practice document. Dental professionals use the document to a lesser extent.
- Dental professionals reported high levels of awareness and a good understanding of their own scope of practice, which has mainly been gained through education, work and training and development. Dental professionals reported low levels of awareness of the scope of others in the dental team.
- The research found concerns among dental professionals and stakeholders about the suggestion that there may be substantial changes or that the guidance may no longer exist. The reason for this was concern that others may act out of scope.

Fitness to practise

Alongside this research, we carried out an analysis of the GDC's fitness to practise data to get a better understanding of how the GDC is using the Scope of Practice guidance when applying it to fitness to practise cases.

Although cases concerning dental professionals acting outside of their scope of practice make up only a very small proportion of all fitness to practise concerns raised, almost one third of them progress to a hearing. Of those cases that were referred to a hearing and a sanction was issued the breach of the Scope of Practice guidance was only one of several factors that contributed to the final decision.

Further details on the results of the fitness to practise analysis can be found within this webinar: [Fitness to practise review](#).

Based on our review and our engagement with colleagues we expect there to be little impact on fitness to practise function. However, we will continue to work across the GDC and with other parties to understand the impact the revised guidance could have on the fitness to practise process to ensure that any issues are addressed and mitigated.

Stage two: Purpose and format

The second stage of the review analysed the key purpose of the Scope of Practice guidance, taking into account the reasons for its introduction in 2009, as well as the GDC's strategic functions and strategic direction. We met representatives from key stakeholder organisations to discuss options for updating and presenting the guidance. These meetings focused on improvements to the current format and content that maintained the key purpose of the guidance, which is public protection.

Stage three: Content development

The third stage of the review drew on the evidence and intelligence from the first two stages. We worked closely with partner organisations, dental professionals, professional associations, indemnity providers, and education representatives to test, develop, and refine the content of the revised guidance. This helped us to define the boundaries of each dental professional role so that this could be clearly explained in the guidance.

Section 5: Meeting the review objectives

The proposed revised [Scope of Practice guidance](#) has been developed to address each of the review objectives listed in section 3 and as set out below.

Centred on protecting patients: the revised guidance aims to protect patients by guiding dental professionals to practise safely within clear boundaries of their role. The guidance is based on an individual's specific circumstances, training, and experience which can change over time. To ensure that they are practising safely, professionals must follow the guidance for their role when making professional judgements as to what is within their scope, and work within clear boundaries.

Supportive and guiding: the revised guidance has moved away from providing a list of things that could be undertaken by each professional group and instead provides criteria for

decision making to support and guide professional judgement. This includes the things that must be taken into account when determining scope, referencing (but not replicating) existing standards, guidance and regulations, including the GDC's [Standards for the Dental Team](#) as well as those produced by other organisations.

Enabling: the revised guidance aims to be enabling and supportive rather than constrictive and is restrictive only where there are patient or public safety reasons for this.

Flexible: the revised guidance supports professionals to define and determine their scope of practice while providing flexibility for decision making. Additionally, it allows dental professionals to exercise professional judgement within an ever-changing environment.

Futureproof: the revised guidance supports the future delivery of dentistry by setting boundaries for each role which ensure that as dentistry continues to evolve, professionals have space to safely expand their scope.

Section 6: Consultation questions

Scope of Practice review objectives

The following questions are about the Scope of Practice review objectives. Looking at the proposed [guidance](#) and the information provided in this consultation, please answer the following questions.

1. To what extent do you agree or disagree that the proposed Scope of Practice guidance protects patients by guiding dental professionals to practise safely within clear role boundaries?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please explain your answer:

2. To what extent do you agree or disagree that the proposed Scope of Practice guidance supports and guides professional decision making?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please explain your answer:

3. To what extent do you agree or disagree that the proposed Scope of Practice guidance helps to enable the dental team and individuals to work to their full potential in a variety of settings?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please explain your answer:

4. To what extent do you agree or disagree that the proposed Scope of Practice guidance sets role boundaries while also being adaptive to changes in the dentistry environment?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please explain your answer:

5. To what extent do you agree or disagree that the proposed Scope of Practice guidance can support the future delivery of dentistry?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Please explain your answer:

Impacts of the Scope of Practice guidance

The following questions are about the impacts of the proposed Scope of Practice guidance. Looking at the proposed [guidance](#) and the information in this consultation, please answer the following questions.

6. In your view, what are the benefits associated with the updated Scope of Practice guidance?

7. In your view, what are the risks associated with the updated Scope of Practice guidance?

8. Please tell us below about any improvements you think that we can make to the role descriptions for each member of the dental team.

Dental professional role	Comments/suggestions for improvement
1. Clinical Dental Technicians (CDTs)	
2. Dental Hygienists	
3. Dental Nurses	
4. Dental Technicians	
5. Dental Therapists	
6. Dentists	
7. Orthodontic Therapists	

The primary purpose of the Scope of Practice guidance is to protect patients by guiding dental professionals to conduct only tasks that they are trained, competent and indemnified to perform safely and which are appropriate to their professional title. However, there may be other ways in which the Scope of Practice is being used. For example, by individuals and organisations overseeing the education and employment of dental professionals.

9. If you are aware of other uses of the Scope of Practice, by individuals or organisations, please tell us about any impacts you think the proposed changes will have

10. Please tell us anything else that you think we should consider in relation to our proposal to update the Scope of Practice guidance.

Section 7: Equality, diversity, and inclusion

The GDC has committed to strategic equality, diversity, and inclusion (EDI) objectives as part of our organisational planning. We aim to foster inclusion, promote diversity and further eliminate discrimination in line with our [Equality Diversity and Inclusion Strategy](#).

The proposals set out in this consultation were developed with the EDI objectives in mind. The updated guidance focuses on the principle of being trained, competent, and indemnified rather than on detailed rules. As such, the updated Scope of Practice guidance should provide greater adaptability to support the diverse needs of both patients and dental professionals while ensuring common understanding of the boundaries of each role in the dental team. These changes are intended to support professionals and protect patients.

Question

11. Please tell us about any impacts you think the updated Scope of Practice guidance will have on people with the following protected characteristics:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

About you

12. Are you responding as:

- An individual
- On behalf of an organisation

Please tick or circle to indicate your answer.

13. Please complete the following (for inquiry purposes only, details will not be published and will not form part of an FOI release).

Full name	
Organisation	
Email address	

14. Please select the option that best describes you or your organisation:

- Education or training provider.
- UK registered dental professional.
- Dental patient or member of the public.
- Professional body.
- NHS.
- Regulator.
- Training or studying to join the GDC register.
- Other.

14a. If you selected 'other' please specify in the box below.

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EDI monitoring

Please tell us a bit about you by completing an anonymised survey. This information will not be connected to your responses to this consultation. We will use the data you provide us for overall analysis and insight into the fairness and inclusivity of our processes.

Providing this data is extremely helpful, and we would like to encourage you to complete this step.

You can access the EDI monitoring survey by visiting <https://gdc.onlinesurveys.ac.uk/equality-monitoring-form-scope-of-practice>

If you require this EDI monitoring survey in an alternative form, please email stakeholder@gdc-uk.org