

General Dental Council (GDC) Consultation on the Principles of Professionalism Framework

Faculty of Dental Surgery (FDS) response

SECTION 1: Understanding who is responding

ORGANISATION OR INDIVIDUAL

1. Does your response represent your personal views, or are you providing the official response of an organisation?

- Personal response [Go to Q.4]
- Organisation response [Go to Q.2]

ORGANISATION QUESTION FOLLOW UP

2. Please tell us the name of your organisation.

The Faculty of Dental Surgery (FDS) at the Royal College of Surgeons of England

SECTION 2: the Principles of Professionalism

1. To what extent do you agree or disagree that the role of the Principles is clear?

- Strongly agree
- **Agree**
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your answer

The Faculty of Dental Surgery (FDS) at the Royal College of Surgeons of England considers the role of the principles to be clear. We support the move to reorganise and simplify existing standards in a way that makes key professional themes more accessible and easier to

navigate. We also welcome greater consistency with the General Medical Council's approach in presentation. Clarity of the overarching principles must be supported by practical guidance and examples to help registrants understand how the principles should be applied in complex clinical and professional situations.

2. To what extent do you agree or disagree that the Principles capture the key areas of professionalism in dentistry?

- Strongly agree
- **Agree**
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your answer

The principles broadly capture the key areas of professionalism in dentistry. However, dental practice has changed considerably since the current 'Silverbook' was introduced in 2013, and the new framework and its supporting guidance must respond to these changes.

These include:

- Unequal access to dental care across the country,
- The growing use of social media,
- Digital technologies and artificial intelligence (AI),
- Changes in the balance between NHS and private dentistry,
- The growth of corporate-owned multi practice groups,
- Increasing provision of urgent rather than long-term care,
- The move towards cosmetic dentistry instead of oral health,
- Health tourism,
- The environmental impact of dentistry,
- And the increasing recognition of the relationship between oral and general health.

The framework should also recognise the importance of multidisciplinary and specialist practice. Dental professionals should understand the advanced skills and expertise of specialists and know when it is appropriate and in the patient's best interests to refer for specialist care.

The framework and supporting materials should be accessible to all registrants, including the increasing number of internationally qualified professionals joining the UK register through routes such as the Licence of Dental Surgery (LDS) and the Overseas Registration

Examination (ORE), who may be less familiar with professional expectations and the culture of healthcare delivery in the UK.

The framework should also recognise that professional dental practice extends beyond the direct provision of care to individual patients. Dental professionals work across a wide range of roles and settings, including Dental Public Health and population-level practice, community services, education and training, research, policy development and the leadership and management of dental organisations. These activities may affect patients and the public indirectly and form an important part of modern professional practice. The principles and supporting guidance should therefore be sufficiently broad to remain relevant to registrants working across the full range of professional roles and settings.

The GDC may also wish to consider whether the terminology used throughout the framework appropriately reflects the breadth of the modern oral and dental health professions.

3. To what extent do you agree or disagree that the Principles, when applied by dental professionals, will help maintain public and patient safety?

- Strongly agree
- **Agree**
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your answer

The principles are broadly appropriate and maintain a clear focus on patient and public safety. Their effectiveness will, however, depend on how they are applied in practice and whether registrants are supported to exercise sound professional judgement. Accompanying guidance and supporting materials should therefore include sufficient practical examples covering complex issues such as referral decisions, working within competence, consent, management of vulnerable patients and balancing competing professional obligations.

SECTION 3: Professional Guidance

4. To what extent do you agree or disagree that the criteria for Professional Guidance are clear?

- Strongly agree

- **Agree**
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your answer

The criteria for professional guidance are broadly clear and appropriate. However, the guidance developed under the framework will need to remain responsive to changes in dentistry and wider society. It should be regularly reviewed and updated to ensure it continues to reflect clinical practice and the environments in which dental professionals are working, particularly with emerging technologies.

FDS would also welcome greater clarity on the governance arrangements applying to each statutory component of the framework. The consultation states that Professional Guidance must undergo formal consultation before it can be issued, varied or withdrawn, but it is less clear what processes will apply to changes to the Principles and Expectations. Given the status of these components and their potential relevance to fitness to practise proceedings, the GDC should set out clearly how each may be issued, amended or withdrawn, including how registrants and representative professional bodies will be consulted on, and notified of, substantive changes.

5. In addition to the areas listed above, are there any other aspects of professional practice or conduct that you think meet the criteria for the GDC to issue Professional Guidance?

Please explain your answer

FDS considers that professional guidance should address emerging and changing areas of dental practice where additional clarity would support registrants to practise safely and professionally. FDS would also welcome a more proportionate and streamlined approach to Continuing Professional Development (CPD), particularly where registrants can already demonstrate through robust professional appraisal or equivalent processes that their CPD has been appropriately reviewed

Areas that should be considered include:

- The unequal lack of access to dental care across the country,
- The impact of social media and of AI,
- The shift towards private dentistry instead of NHS dentistry,
- The shift towards corporate-owned multi practice groups,
- The shift towards urgent care instead of long-term contracts,
- The shift towards cosmetic dentistry instead of oral health,

- Health tourism,
- The environmental impact of dentistry,
- The links between oral and general health.
- The management of vulnerable patients,
- Specialist referral and recognition of when a patient would benefit from specialist expertise,
- Practising within an individual professional's competence and skillset,
- And providing evidence-based clinical care that is in the best interests of the patient.

SECTION 4: the Expectations

6. To what extent do you agree or disagree that the purpose of the Expectations is clear?

- Strongly agree
- **Agree**
- Neither agree nor disagree
- Disagree
- Strongly disagree

The purpose of the expectations is clear. However, greater clarity is needed regarding how the expectations interact with professional guidance, supporting materials and fitness to practise processes.

7. To what extent do you agree or disagree that the Expectations themselves are clear?

- Strongly agree
- **Agree**
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your answer

FDS considers the expectations to be clear and understandable. We note that clarity should be tested with a diverse range of registrants, including internationally qualified professionals, specialists and members of the wider dental team, to ensure consistent interpretation across the profession.

8. To what extent do you agree or disagree that the Expectations cover the areas in which the regulator should set expectations for registrants?

- Strongly agree
- **Agree**
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your answer

The expectations cover the areas in which regulators should set expectations for registrants. Supporting guidance should be sufficiently broad to reflect the full range of settings in which dental professionals practise, including specialist, hospital and primary care settings, as well as those working in education, research, public health, leadership and other professional roles.

The changing structure of dental provision should also be considered. In particular, there is an important question around how professional expectations operate where non-registrants hold senior or decision-making positions within corporate dental providers and may influence the environment in which registrants provide patient care. While the General Dental Council (GDC) regulates individual registrants, the framework should recognise the wider organisational context within which professional decisions are increasingly made.

SECTION 5: the Supporting Material

9. To what extent do you agree or disagree that the purpose of Supporting Material is clear?

- Strongly agree

- **Agree**
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your answer

The purpose of supporting materials is clear and FDS welcomes the use of different formats to help registrants understand and apply the framework in practice. This is particularly important for a diverse profession, including younger professionals and internationally qualified registrants who may have different experiences of professional regulation.

Supporting materials should complement rather than duplicate the professional guidance and should be accessible to different audiences.

The purpose of Supporting Material is clear and FDS welcomes the use of different formats to help registrants understand and apply the framework in practice. This is particularly important for a diverse profession, including younger professionals and internationally qualified registrants who may have different experiences of professional regulation.

FDS would welcome greater clarity on how Supporting Materials will be developed, reviewed, updated and withdrawn. Although these materials will not have statutory status, they are likely to play an important role in shaping how registrants understand and apply the statutory elements of the framework. The GDC should therefore set out a transparent approach to their governance and to communicating substantive changes to the profession.

Professional bodies should also be routinely involved in the development and review of Supporting Materials where they relate to professional or clinical practice. The GDC should consider developing specialty-specific examples and case studies, alongside resources reflecting the range of environments in which dental professionals work, including primary care, community, hospital and specialist settings. This would help ensure the framework can be applied meaningfully across the breadth of modern dental practice.

10. Are there any topics in particular that you believe the GDC should prioritise to support registrants in using the Framework?

Please explain your answer

The overriding priority should be helping dental professionals understand how to put patients' interests first and provide ethical, evidence based care that is appropriate to their own skill set.

Supporting material should address:

- Exercising professional judgement in complex clinical situations,
- Providing evidence based care in the patients' best interests,
- Practising within an individual's skill set and recognising when referral is appropriate,
- Referral to secondary care and specialist care,
- Digital dentistry and AI,
- Multidisciplinary care,
- Caring for vulnerable patients,
- Equality, diversity and inclusion,
- And raising concerns.

SECTION 6: Framework for Professionalism

11. To what extent do you agree or disagree that the proposed Framework for Professionalism will prioritise patient safety and public confidence?

- **Strongly agree**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your answer

Patient safety and public confidence are fundamental to professional regulation and the proposed framework retains a strong emphasis on both. The extent to which these objectives are realised in practice will depend on the quality, accessibility and consistency of the supporting guidance and materials provided alongside the framework.

12. To what extent do you agree or disagree that the proposed Framework for Professionalism encourages and supports the use of professional judgement?

- Strongly agree
- **Agree**
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your answer

FDS welcomes the move towards a less prescriptive framework and greater recognition of professional judgement. However, it is too early to determine how effective this approach will be in practice.

Success will be dependent on the quality and relevance of the professional guidance and supporting material provided alongside it. It is important that the guidance reflects the context of a modern and changing clinical workplace and is sufficiently clear and relevant across different clinical environments, models of care and wider professional roles.

13. To what extent do you agree or disagree that the proposed Framework for Professionalism supports dental professionals to make the appropriate decision for each situation?

- Strongly agree
- Agree
- **Neither agree nor disagree**
- Disagree
- Strongly disagree

Please explain your answer

FDS supports the intention of the framework to provide a more principles-based approach to professional decision-making. It is difficult at this stage to assess how effectively it will support decision-making in practice. Success will depend on the quality of the professional guidance and supporting materials. Practical examples will be essential to help registrants apply professional judgement consistently.

14. To what extent do you agree or disagree that the proposed Framework for Professionalism provides a useful way to organise guidance for registrants?

- Strongly agree
- **Agree**
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please explain your answer

The proposed structure provides a clearer and more relevant way of organising professional guidance than a standalone list of principles. The layered approach is logical and should also make it easier for guidance and supporting materials to be updated in response to developments in dental practice. It is important that registrants can easily navigate between the principles, expectations, professional guidance and supporting materials.

SECTION 7: the relationship between the Framework for Professionalism and Fitness to Practise

Note: no questions to answer in this section, for information only.

SECTION 8: Equality Impact Assessment

As part of these considerations and in order to meet requirements associated with the Equality Act (2010) and the Public Sector Equality Duty (PSED), we ensure the equality and diversity implications of new proposals are considered through an Equality Impact Assessment, and we are seeking to gather further information on the impact of the proposals from respondents.

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.

Would any people in the above groups face increased inequalities, challenges or difficulties as a result of a move to a principles-based model for setting standards and providing guidance to the dental team?

15. Please specify which groups you think would be impacted and how. Please let us know if you have any suggestions for how these issues could be addressed.

FDS has not identified any protected groups that would be disproportionately disadvantaged by a move to a principles-based framework. However, careful consideration should be given to accessibility for registrants with disabilities. Consideration should also be given to internationally qualified professionals who may be less familiar with UK professional and regulatory expectations and may benefit from additional explanatory resources.

16. Would the Framework for Professionalism address any existing equality issues, challenges or difficulties that you are aware of? Please specify which groups you think would be impacted and how. If applicable, please let us know if you have any suggestions for how these issues could be better addressed.

Potentially. A clearer and more accessible framework may support greater consistency in understanding professional obligations across a diverse profession. This may particularly benefit those entering UK practice from different educational, cultural or regulatory backgrounds.

17. Would the Framework for Professionalism have any positive equality impacts? Please specify which groups you think would be impacted and how.

Potentially. If implemented effectively, a clearer and more accessible framework could improve understanding of professional expectations across different groups of registrants and support more consistent professional practice.

18. Thinking about the above, do you think the proposed Framework has any impacts (positive/negative/neutral) on opportunities to use the Welsh Language?

- Positive

- Negative
- **No Impact**
- Don't know

19. Thinking about the above, do you think the proposed Framework has any impacts (positive/negative/neutral) on treating the Welsh Language no less favourably than the English Language?

- Positive
- Negative
- **No Impact**
- Don't know

20. Do you think there are ways to enhance the positive impacts or reduce the negative impacts of our proposal?

FDS does not consider that the move to a principles-based framework should, in itself, negatively affect opportunities to use the Welsh language or the principle that Welsh should be treated no less favourably than English. However, as Professional Guidance and Supporting Materials may be developed and updated more frequently under the proposed framework, the GDC should ensure that Welsh-language versions are made available and updated alongside English-language materials wherever appropriate. This should form part of the governance arrangements for developing and updating the framework and its supporting resources.