

# International registration: responding to the GDC

Sir, The GDC's Stefan Czerniawski wrote in last month's *BDJ in Practice* about international registration in relation to the changes that have been made to the Overseas Registration Examination (ORE) and the changes that are likely to be coming around provisional registration.<sup>1</sup>

Stefan is right to highlight the important contribution made by overseas qualified dentists to the delivery of oral healthcare in the UK. Without their valued contribution, NHS dentistry in particular would be in an even more perilous state. He is also right to emphasise the role of our regulator in ensuring that all professionals accepted onto the register meet the appropriate high standard.

The access crisis in NHS dentistry across the four UK nations is an important backdrop to these registration developments. We have seen a reduction in the amount of NHS care being delivered as dentists and their teams opt to move away from broken contractual and payment systems. The GDC has been under clear political pressure to help solve this crisis by making it easier to increase the workforce supply.

In the long term, the UK Government has signalled its intent to increase domestic workforce supply (although still with little detail as to how). It must be right that, as much as possible, we seek to meet our own clinical skills requirements instead of relying on often poorer countries to train clinicians for us. But in the short term at least, the Government is looking to dentists qualified overseas to help address our problems.

Since before the pandemic, there has been a logjam within the existing ORE process and the GDC is seeking to address that by increasing the number of places and sittings available for the two parts of its exam. It is right that the GDC should make sure that its administrative processes run smoothly. It must never compromise on standards, but it should not be delays to registration processes that determine how many overseas qualified professionals are able to work in the UK. Process capacity should not be driving decisions about workforce.

That leads to the question of whether we have the right number of dentists in the UK, and how we determine what that number should be. We do still have a growing number of dentists (and most other registrants) on the GDC register, but we have a lack of information about what existing registrants are doing. The GDC's recently launched exercise in collecting workforce data should be useful in providing that information and in establishing future trends. What is clear already is that many of our members tell us that they struggle to recruit dentists, and that the problem is significantly more acute for those focused on NHS care.

That is why we do not see increasing the number of dentists or other professionals as an answer in itself to solving the problems of NHS dentistry. We have frequently used the 'leaky bucket' analogy – we may recruit professionals to provide NHS care, but they will not stay in a broken system for long. All roads lead back to fixing NHS systems as the key to saving NHS dentistry.

The Government appears to see things differently and is promoting the idea of provisional registration as a key part of the solution. This is intended as a new route for overseas qualified dentists, operating under supervision whilst they work towards the requirements of full registration. There are lots of questions about how this new system will work and the GDC is likely to be left to figure out how it fulfils its obligations to make it work safely and effectively. Here are just a few areas that will need to be addressed for starters:

- The minimum requirements for provisional registrants in terms of qualification, clinical experience and language proficiency
- Supervisor requirements in terms of training, practising environment, time availability and responsibility for the provisional registrant's work
- The time limitation for provisional registration
- The process to demonstrate the requirements for full registration at the end of the provisional registration period

- The costs attached to the introduction of provisional registration and whether the initial costs will be borne by current registrants
- What the costs will be to provisional registrants themselves and to supervisors
- The availability of supervisors given the stated focus of provisional registration towards NHS dentistry, and the need for those potential supervisors to focus on delivery
- The impact of the time taken for supervision on overall NHS delivery
- Given its capacity issues with existing systems, whether the GDC will be able to manage potentially significant levels of application
- The effects of provisional registration on NHS regulations, including the performers list regulations in England and Wales and respective regulations in Northern Ireland and Scotland
- Indemnity arrangements for both provisional registrants and supervisors
- The employment status of provisional registrants and the need to protect them from potential exploitation in the workplace.

In relation to the last of these points, it is crucial that a vulnerable group of dentists is looked after in the workplace, something that BDA membership can help deliver with its advice, representation, education and collegiate support. We encourage any dentist who is considering coming to the UK, and anyone aware of someone who might be considering it, to get in touch.

The GDC will have its work cut out in addressing the above and other issues in the likely event that it consults later this year. As ever, the BDA will be there to make sure that the profession's view is heard and that the GDC fulfils its responsibilities to maintain registration standards. ♦

**L. Cross, Chair of the BDA's Education, Ethics and the Dental Team Working Group**

## Reference

1. Czerniawski S. International registration of dental professionals: A changing landscape. *BDJ In Pract* 2024; **37**: 132-133.