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Evidence from The British Dental Association – HIW 05

The Work of Healthcare Inspectorate Wales

Inquiry by the Health and Social Care Committee of the National Assembly for Wales.

The British Dental Association (BDA) is the professional association for dentists in the UK. It represents 20,000 dentists working in general practice, in community and hospital settings, in academia and research, and in the armed forces, and includes dental students.

We welcome the opportunity to comment on this Health and Social Care Committee inquiry.

September 2013

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1. Healthcare Inspectorate Wales (HIW) is responsible for:

- the registration of general practice dentists who provide any of their services to patients under a private arrangement and
- for the inspection of their practice' premises.

Effectively this means that the vast majority of dentists practicing in Wales will need to be registered as even those with a large NHS contract and commitment will be providing some items of treatment that are either not funded through the NHS contract, or through patient choice, privately.

2. The arrangements for Wales in monitoring private practice differs from those in England in that it is dentists' practice premises, and not dentists per se that are registered with the Care Quality Commission (CQC). When the legislation enabling HIW was set up, BDA argued for premises registration but this was not taken up although we believe that this will change at some point.

3. The disadvantages of registering individual dentists are:

- Dentists may work in several practices and need to register in each as individuals.
- For the majority, the HIW registration process duplicates the requirements for obtaining an NHS performer number in Wales.

Registration of practice premises would reduce the administrative burden on the practices as it could be linked to the obligations of NHS contractors who, in Wales complete an annual return to Public Health Wales (PHW) in which they list the individual dentists and their registered workforce. They also self-certify that relevant health and safety processes and protocols are in place.

4. The major problem with HIW registration is that it is slow, taking upwards of six weeks. This is a disincentive for those who wish to work as, for example, locums in Wales as often the need for a locum is immediate. This would be obviated if premises, rather than individuals were registered.

The practice inspection process.

5. This in itself has not been a problem and the practices that are wholly private that have been inspected have welcomed the assurance that they are fully compliant with legislative requirements that the HIW process has given them. That said, the inspection of wholly private practices has, we believe, come to a halt as HIW does not have sufficient workforce with expertise to undertake these inspections.

6. HIW needs to have appropriately experienced individuals to undertake these inspections and they only really need to inspect wholly private practices. NHS contract holders' premises are inspected through the PHW network:

- when they first open,
- undertake major refurbishment,
- if there are patients' complaints or
- on a regular three year cycle

so the need for HIW to inspect them is, in our view, negated.

BDA

7. A problem lies in identifying the practices that do not have an NHS contract! Even though HIW and the Private Dentist (Wales) Regulations 2008 have been in place for a number of years there have been occasional 'misses' and practices have only been identified as the result of a complaint.
8. A comprehensive database of ALL practices in Wales would be useful in that could be used to send equipment failure warning notices, educational opportunities etc and know that all dentists in Wales are being kept fully informed.
9. The General Dental Council, the body responsible for educational standards and for registering dentists and complementary professionals (DCPs) has recently announced that dental hygienists and therapists should be allowed to see and treat patients without the patients first having to see a dentist. In effect this could mean that they could set up independent practices. Currently HIW has no powers to inspect their premises or regulate them under the existing Private Dentistry Regulations as indeed it has no powers to inspect beauty salons / hairdressers who are providing tooth whitening!
10. In summary:
 - BDA considers that HIW fulfils a useful role but for many practices it duplicates processes already in place.
 - HIW is administratively slow and this is both a frustration and a disincentive for dentists wishing to work in Wales.
 - HIW needs to work collaboratively with organisations already in existence, PHW and BDA who could offer them some support.
 - HIW needs to be able to respond to UK legislative changes quickly and efficiently.
 - HIW should be able to take action against those individuals who are providing illegally those things considered to be 'the business of dentistry'

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