

Response to the consultation: Removal of registrants' full addresses from the online register

June 2016

1. Introduction

- 1.1 The Professional Standards Authority for Health and Social Care promotes the health, safety and wellbeing of patients, service users and the public by raising standards of regulation and voluntary registration of people working in health and care. We are an independent body, accountable to the UK Parliament. More information about our work and the approach we take is available at www.professionalstandards.org.uk.
- 1.2 As part of our work we:
 - Oversee nine health and care professional regulators and report annually to Parliament on their performance
 - Conduct research and advise the four UK governments on improvements in regulation
 - Promote right-touch regulation and publish papers on regulatory policy and practice.
- 1.3 We welcome the opportunity to respond to this consultation about removal of registrants' addresses from the online register. We offer both general comments and specific comments on the General Dental Council's (GDC) consultation document.

2. General comments

- 2.1 The Authority published *Health professional regulators' registers: Maximising their contribution to public protection and patient safety* in 2010. This supports a key objective outlined in the GDC's consultation document – that registrants' full home addresses need not be published on the online register. However, the proposed changes appear to enable the register not to include an indication of the location of practice. A recommendation from the Authority's 2010 report was that the registers should provide an indication of location of practice (see section 3 below).
- 2.2 In *Health professional regulators' registers* we discuss what participants in an online study prioritised as important on a regulator's register. The participants identified the following items as 'essential information' on a regulator's register:
 - Full name
 - Registration number
 - Fitness to practise details
 - Formal qualifications

- Address of practice.¹

2.3 The following were viewed as ‘nice-to-have information’:

- Areas of specialism
- Practice opening hours
- Telephone numbers
- Last updated date
- Google maps function
- Registration expiry date.²

2.4 In the lists above, the addresses of registrants is not mentioned. Regulatory stakeholders indicated ‘a general consensus’ that information relating to registrants’ home addresses should not be included on the register. Pertinently, some stakeholders mentioned address information should not be shown as - due to mobility of professionals - there would be constant updating required. Anecdotal evidence of ‘disgruntled patients’ using registrants’ home addresses to harass professionals was also raised.³

3. Specific consultation comments

- 3.1 It appears that the GDC is asking two key questions: should there be no information at all on the online register in relation to the registered address (whether this be a home or practice address); and should there be some general information (such as a postal town) in relation to the registered address (again, whether this be a home or practice address).
- 3.2 We make the recommendation of registers ‘providing an indication of location of practice as a means of helping to identify an individual professional’.⁴ The listing of address of practice in the register entry for a professional should satisfy this recommendation. If the premises address is published then additional location information (such as the town in which a dentist lives) is not required. If the premises address is not published then location information will be required on the register.
- 3.3 In summary, we recommend that it should be clear to the public viewing registrants’ details that the location on the register originates from a registered address and does not necessarily indicate location of practice.

¹ Professional Standards Authority, *Health professional regulators’ registers: Maximising their contribution to public protection and safety*, pg. 14. Available at:

<http://www.professionalstandards.org.uk/docs/default-source/publications/policy-advice/health-professional-regulators-registers-2010.pdf?sfvrsn=8>

² Ibid.

³ Ibid, pg. 15.

⁴ Ibid, pg. 25.

4. Further information

- 4.1 Please get in touch if you would like to discuss any aspect of this response in further detail. You can contact us at:

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