

This monitoring report covers the period 1 October 2023 to 30 September 2024. You can find out more about our performance review process at the end of our report.

Key findings and areas for improvement

- The GDC did not meet Standard 3 because we did not have sufficient assurance that it was meeting three of the four outcomes that we require under our new approach to this Standard. There are concerns with the progress and public reporting on the GDC's previous and current EDI strategies. There is a lack of emphasis on diversity in the GDC's current standards, and it does not currently require education and training providers to demonstrate that they take appropriate account of diverse student needs. There are gaps in the EDI training for Council members and others. We have commended the GDC on its work to ensure that it seeks out and acts on the views of a diverse range of stakeholders in its policy and research work. We have also outlined a number of opportunities for improvement.
- The GDC met Standard 11 this year having not met it for the last two years. The median processing time for UK graduate applications has improved quarter by quarter in this review period. The GDC has been clearing the backlog of overseas-qualified dentists who applied as Dental Care Professionals (DCPs) prior to the route closing on 8 March 2023. We will expect it to continue to improve its performance in processing applications.
- The GDC did not meet Standard 15 because it is taking too long to deal with fitness to practise cases. The GDC has put in place measures to improve its fitness to practise timeliness, but these have not yet made sufficient improvements to the time it is taking to reach decisions in cases. We have written to the Secretary of State for Health and Social Care and the Chair of the Health and Social Care Committee to provide an update on the GDC's performance, and we will continue to closely monitor the GDC's performance in this area.
- The GDC met both of our Standards for education and training. It has a lot of activity planned or underway in this area and we heard a range of views from stakeholders. We will look closely at its education work as part of our periodic review next year.

Standards met 2023/24



General Standards	4 out of 5
Guidance and Standards	2 out of 2
Education and Training	2 out of 2
Registration	4 out of 4
Fitness to Practise	4 out of 5
Total	16 out of 18

GDC standards met 2021-23

2022/23	16
2021/22	16
2020/21	17



123,444

professionals on the register
(as at 30 September 2024)

General Standards

The GDC met four of five General Standards this year. The GDC met Standards 1, 2, 4 and 5 and did not meet Standard 3.

These five Standards cover a range of areas including: providing accurate, accessible information; clarity of purpose; equality, diversity and inclusion; reporting on performance and addressing organisational concerns; and consultation and engagement with stakeholders to manage risk to the public.

Our report focuses on Standard 3 because we have used a new approach to assessing the regulators against this Standard. More information is available in our [guidance document](#).



“I have to commend the GDC on their continued efforts to engage positively with the professions. The Dental Leadership Network has proved to be fruitful and positive; they listen and give the opportunity for us to meet and talk with them.”

Stakeholder feedback

Our assessment of the GDC’s performance against Standard 3

As part of our new approach, we have broken down the Standard into four separate outcomes. For a regulator to meet the Standard, we would need to be assured that the regulator has met all four of the outcomes. Our assessment of the GDC’s performance against the four outcomes is set out below.

Outcome 1: The regulator has appropriate governance, structures and processes in place to embed EDI¹ across its regulatory activities

The GDC collects data for relevant protected characteristics for senior leadership, Council members, Committee members, legal advisers and fitness to practise panellists.

In past reviews, we have reported on concerns with the implementation of the GDC’s last EDI Strategy. The GDC did not publish an action plan for the Strategy or publicly report on its delivery, outcomes or impact. It remains unclear how successful implementation was. The GDC has since made changes intended to strengthen its process for tracking and reporting on progress of EDI actions, but we remain unclear as to the role governance played in the concerns with the implementation of its previous EDI Strategy.

In this review period the GDC published an EDI Strategy for 2024-25. It plans to publish an action plan for its delivery. But public reporting on the content and progress of the plan has been limited in the review period. We have also, again, seen concerns being raised through the GDC’s governance structure about progress against the new plan. The lack of clear reporting and apparent lack of progress against the current EDI Strategy meant we were not assured that the GDC is meeting this outcome.

Opportunity for Improvement

The GDC has not published its process for carrying out Equality Impact Assessments (EIA) and does not routinely publish EIAs. We encourage the GDC to consider publishing its EIA process and the EIAs it carries out as part of its research and policy work.

Outcome 2: In terms of EDI, the regulator ensures that registrants and students are equipped to provide appropriate care to all patients and service users, and have appropriate EDI knowledge and skills

The GDC's Standards for the Dental Team include requirements to treat patients with respect and dignity and to be sensitive to individual needs and values. There is no specific mention in these Standards of challenging discrimination. The GDC has commenced work to review these Standards.

The GDC is introducing the Safe Practitioner Framework, which sets out the skills and knowledge that graduates need for registration. The GDC revised these learning outcomes last year and they now include an increased emphasis on diversity and cultural competence.

Opportunity for Improvement

The Safe Practitioner Framework has an implementation date of September 2025. The GDC plans to assure itself that all education providers ensure newly-qualified professionals meet the requirements of the Framework by 2030/31. We encourage the GDC to ensure that all education providers are provided with clear guidance as to the thresholds and criteria they will need to demonstrate in order to meet the new EDI expectations in the Framework.

The GDC's current Standards for Education require providers to comply with EDI legislation, and supervisors and examiners/assessors to have received EDI training. The Standards state that students must see an appropriate breadth of patients but do not explicitly consider this in terms of diversity. The GDC is reviewing these Standards and plans to publish revised Standards in the second half of 2025. But it does not currently require education and training providers to demonstrate that they take appropriate account of diverse student needs. The lack of emphasis on diversity in its current standards and

the gaps in the GDC's requirements meant that we were not assured that it is meeting this outcome.

Outcome 3: In terms of EDI, the regulator makes fair decisions across all regulatory functions

The GDC holds almost complete registrant data across six protected characteristics. It has recently made improvements to the data it collects and is considering further possible improvements.

The GDC uses its data to identify areas of potential unfairness in its fitness to practise process. It found that overseas-qualified professionals are overrepresented in referrals to fitness to practise. It has introduced a programme of webinars for professionals who qualified outside the UK.

The GDC has collected EDI informant data in the past and has carried out work to improve its process. The GDC has now restarted EDI informant data capture.

The GDC told us it ensures that some staff and associates receive EDI training, focused on the EIA process. It was not clear to us what EDI training fitness to practise panellists or other decision makers receive. GDC Council members do not currently receive EDI training. Therefore, we were not assured that the GDC is meeting this outcome.

Opportunity for Improvement

The GDC is reviewing its fitness to practise decision-making guidance to ensure it addresses allegations of discriminatory conduct. We encourage the GDC to ensure that its review of fitness to practise guidance includes guidance for the early stages of the fitness to practise process and that this guidance is published on its website.

Outcome 4: The regulator engages with and influences others to advance EDI issues and reduce unfair differential outcomes

The GDC uses a range of methods to ensure it involves and engages with a diverse range of stakeholders. It incorporates questions around EDI characteristics into its public consultations and uses selective sampling from its large public/patient panel to help identify issues which adversely affect groups of patients and service users. It has sought to use the evidence gathered through those processes to inform its work, including on professionalism, standards for education and international registration.

The GDC's research team has undertaken a range of internally commissioned analyses looking at EDI correlations with fitness to practise complaints, case progression, outcomes and looking at outcomes from remote hearings. The research team has a forward plan for analysing data, incorporating EDI, which is an ongoing programme of work which it reports on at regular intervals.

Good Practice

The GDC actively sought and acted on feedback from a diverse range of stakeholders during the review period. It uses its 30,000-strong public panel to ensure diversity in its recruitment for participants for all the activity it undertakes with the public. We commend its work on ensuring that a range of diverse voices contributed to its research and policy work.

The GDC generally performed well against outcome 4. We determined that we did not have sufficient assurance that the GDC is meeting outcomes 1, 2 and 3. Under our new approach, in order to meet the Standard, we would need to be assured that a regulator has met all four of the outcomes. The GDC's overall performance meant that Standard 3 is not met. We will continue to monitor the GDC's progress

against the evidence matrix for this Standard, particularly in relation to reporting and delivery of its 2024-25 EDI Strategy.

Guidance and Standards

The GDC met both Standards for Guidance and Standards this year.

Promoting professionalism

In this review period, the GDC continued its work to develop a Framework for Professionalism which will form the basis for a new set of standards for registrants. It completed a three-stage stakeholder engagement exercise which sought feedback on both the Framework and more broadly on how the GDC might set its standards and guidance. A public consultation on the Framework is to run from early 2025. We will continue to monitor the GDC's work in this area.

Education and Training

The GDC met both Standards for Education and Training this year.

The GDC published its Review of Education 2022-23 this year, which detailed the quality assurance of education programmes and awarding organisations carried out between August 2022 and July 2023. The Review also noted where the GDC took action when it identified concerns.

Revision of specialty curricula

Last year we reported that the GDC had completed the revision of all 13 curricula for dental specialty training. In this review period we received mixed stakeholder feedback about the GDC's process for reviewing the specialty curricula, particularly in relation to the

orthodontics curriculum. We will continue to monitor the GDC's work in this area and seek stakeholder feedback on its application.

Safe Practitioner Framework

In November 2023, the GDC published the Safe Practitioner Framework which details new learning outcomes. The GDC started to engage with education providers from February 2024 to work towards an implementation date of September 2025. The GDC says it has provided extensions to any providers unable to meet the implementation deadline. We will continue to monitor the GDC's work in this area.

Standards for Education review

The GDC has commenced work to review its Standards for Education by information gathering and stakeholder engagement exercises. Revised standards went out for public consultation in November 2024. We will continue to monitor the GDC's work to revise its Standards.

The GDC has a significant amount of work planned or underway in relation to education and training, and we heard a range of stakeholders' views about it. As part of our periodic review next year, we plan to take a closer look at the GDC's education work.

Registration

The GDC met all four Standards for Registration this year.

Time taken to process applications for registration

The GDC did not meet Standard 11 last year for the second time because it was taking too long to deal with registration applications.

The median processing time for UK graduate applications has improved quarter by quarter since Q4 2022/23 and has remained steady for the last two quarters of this review period at two weeks.

The median time taken to process registration applications from international graduates has increased significantly in this review period. This is because the GDC has been clearing the backlog of overseas dentists who applied as DCPs prior to the route closing on 8 March 2023. The GDC has reduced the backlog significantly, with the number of unworked DCP applications standing at 1,089 by June 2024, down from 5,700 in April 2023. The GDC has increased the number of staff and panel assessments to deal with the backlog of overseas DCP applications.

We are assured by the progress the GDC has made to reduce the backlog, and we are satisfied that this work has not had an adverse effect on the processing of other applications. Therefore, Standard 11 is met. We expect the GDC to continue to make further improvements next year. We will continue to monitor the GDC's processing of international graduates and its progress in clearing the pre-8 March 2023 backlog of DCP applications.

Overseas Registration Examination (ORE)

This year the GDC maintained its expansion of the number of places and sittings for the ORE that we noted in last year's report. The GDC is currently procuring a new provider for the ORE and says it will work with suppliers to improve access and capacity. We will continue to monitor the GDC's work in this area and the impact of any changes made.

Specialist List Assessed Applications

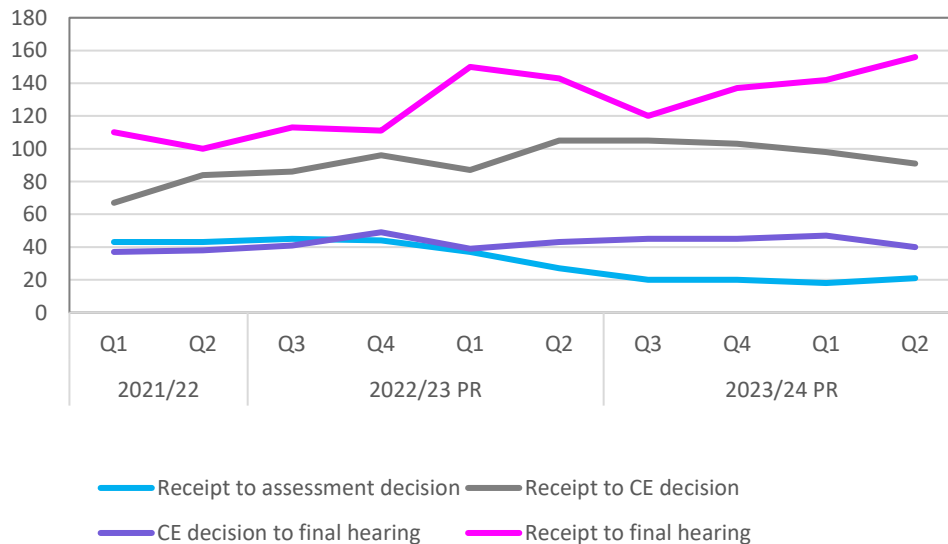
The GDC brought the Specialist List Assessed Applications process in house last year and we have received positive stakeholder feedback about its delivery. The GDC has reviewed and updated the guidance for applicants and has developed an application pack with an application template to ensure that applicants better understand how to evidence their knowledge, skills and experience. The GDC reported that the guidance and application pack have resulted in an increase in the proportion of successful applications. We will continue to monitor the GDC's work in this area.

Fitness to Practise

The GDC met four of five Standards for Fitness to Practise. The GDC met Standards 14, 16, 17 and 18 and did not meet Standard 15.

The GDC did not meet this Standard last year due to the time it was taking to process fitness to practise cases. The GDC has put in place measures to improve its fitness to practise timeliness, but these have not yet made sufficient difference for the GDC to meet the Standard. We have written to the Secretary of State for Health and Social Care and the Chair of the Health and Social Care Committee to provide an update on the GDC's performance, and we will continue to closely monitor the GDC's performance in this area.

Fig 1 Time to progress cases (weeks)



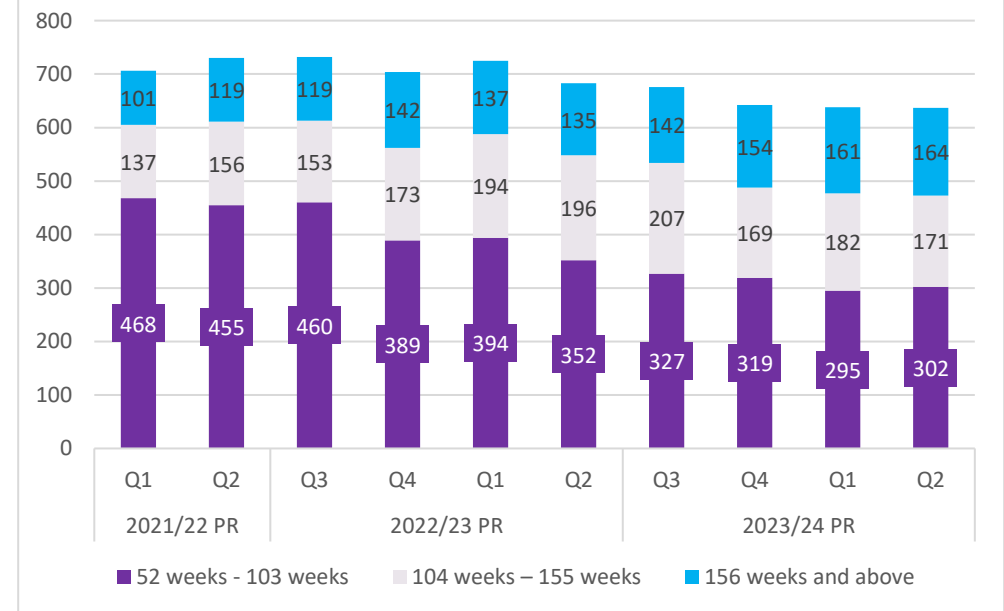
Time taken to progress cases

Figure 1 shows that there is evidence this year of some improvement in timeliness at the earliest stage of the GDC's fitness to practise process. End-to-end fitness to practise timeliness does not appear to have improved since last year. The GDC is still taking too long to reach decisions in fitness to practise cases.

Number of cases over 52 weeks old

Figure 2 shows there is a slight overall reduction in the total number of older cases. However, the GDC now has more cases older than 156 weeks than at any time in the last three review periods.

Fig 2 Number of open old cases



Support for people involved in fitness to practise cases

In our last report we noted research that reported negative experiences of the GDC's fitness to practise process and the measures the GDC planned to put in place to address some of those findings. In this review period the GDC has engaged with stakeholders to review template fitness to practise correspondence from different points of the process and has trained its staff in tone of voice styles in communication. It is also considering ways to improve support for all participants in the fitness to practise process.

In response to a coroner's report, the GDC made changes to the way it reports on interim orders this year. It no longer publishes full determinations by its Interim Orders Committee (IOC); it publishes the outcome and has removed all previous IOC determinations. We are satisfied that the changes the GDC has made to its publication policy are reasonable and bring it in line with other regulators.

Response to Court judgments

In this review period the GDC has published statements outlining its position in response to two Court judgments. The first judgment related to a case on private top-up fees.² The GDC's statement detailed the findings of its review of previous fitness to practise cases in this area and the outcome of independent legal advice through which it determined that no further action was required.

The second judgment related to the application of suspension orders. The GDC's statement outlined its intention to continue to apply existing guidance but with the panel taking a view in each case. We received feedback from a stakeholder raising concerns about the GDC's stated position. The GDC has appealed the Court judgment.³

It is reasonable for the GDC to consider its approach to matters in light of relevant Court judgments. We will continue to monitor the outcome of Court judgments, statements from the GDC and stakeholder feedback in this area.⁴



"We very much welcome the steps the GDC have taken in this past year to review and revise the contents of correspondence sent to registrants during an investigation to ensure a more empathetic tone and include signposting to health and wellbeing support."

Stakeholder feedback

Our performance review process

We have a statutory duty to report annually to Parliament on the performance of the 10 regulators we oversee. We do this by reviewing each regulator's performance against our Standards of Good Regulation and reporting what we find. The judgements we make against each Standard incorporate a range of evidence to form an overall picture of performance. Meeting a Standard means that we are satisfied, from the evidence we have seen, that a regulator is performing well in that area. It does not mean there is no room for improvement. Where we identify areas for improvement, we pay particular attention to them as we continue to monitor the performance of the regulator. Similarly, finding that a regulator has met all of the Standards does not mean perfection. Rather, it signifies good performance in the 18 areas we assess.

Our performance reviews are carried out on a three-year cycle; every three years, we carry out a more intensive 'periodic review' and in the other two years we monitor performance and produce shorter monitoring reports. Find out more about our review process [here](#). We welcome hearing from people and organisations who have experience of the regulators' work. We take this information into account alongside other evidence as we review the performance of each regulator.

¹ Equality, Diversity and Inclusion

² We reported on the case in last year's report.

³ A [recent judgment](#) in another GDC case supported the GDC's previous position on suspension orders.



Quick links/find out more

- ▶ [Find out more about our performance review process](#)
- ▶ [Read the GDC's 2022/23 performance review](#)
- ▶ [Read our Standards of Good Regulation](#)
- ▶ [Read our new evidence framework for Standard 3](#)

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⁴ Shortly after the end of our review period, another [judgment](#) was published which found legal errors in the GDC's handling of a case. Our monitoring next year will include the GDC's response to this