

## General Dental Council – Review of the Standards for Education consultation response

February 2025

### 1. Introduction

- 1.1 The Professional Standards Authority for Health and Social Care (PSA) promotes the health, safety and wellbeing of patients, service users and the public by raising standards of regulation and 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](http://www.professionalstandards.org.uk)
- 1.2 As part of our work we:
- Drive improvements in the performance of the regulators and report annually to Parliament on their performance
  - Challenge in the courts decisions taken by the regulators about the fitness to practise of their registrants if they do not protect the public
  - Raise standards of unregulated practitioners such as counsellors by accrediting non-statutory registers
  - Conduct research and advise the four UK governments on improvements in regulation
  - Promote Right-touch regulation and publish papers on regulatory policy and practice.

### 2. General feedback

- 2.1 We welcome the opportunity to respond to this consultation. We note, in particular, that the proposed requirements for providers relating to admissions to programmes and assessment now incorporate clear expectations regarding equality, diversity and inclusion. This marks a positive step from the narrower focus in terms of EDI found in the current standards.

### 3. Detailed comments

#### *Equality, diversity and inclusion*

- 3.1 We welcome the clearer expectations the proposed Standards place on providers with regard to ensuring that their assessments and admissions processes are fair, inclusive, and transparent. It is positive to see that providers will be required to collect and analyse assessment and examination results against the diversity of the student demographics and take necessary action to address any discrepancies.

- 3.2 We also welcome the requirement for providers “to identify barriers prior to and throughout the programme that may disproportionately impact marginalised groups and take actions to address them.” However, we note that the Standards are less explicit about ensuring student support will be provided where disproportionality is identified. As currently expressed, Requirement 12.2 would lead to a change being made to a programme where marginalised groups may be disproportionately impacted, but it doesn’t necessarily ensure that the individual student(s) affected by the barriers would be supported.
- 3.3 Relatedly, we would suggest that either Requirement 9 or 12 of the Standards, which cover student support and inclusivity, could be strengthened by including reference to providers making reasonable adjustments for those with disabilities and long-term health conditions.
- 3.4 Requirement 7.2 states that “Providers must ensure that students have exposure to an appropriate breadth of patients and procedures to develop the knowledge, skills, competences, and behaviours to demonstrate the learning outcomes and behaviours.” We recognise that the learning outcomes in the GDC’s Safe Practitioner Framework, require students to, for example, “Demonstrate cultural competence, accepting and respecting the diversity of patients and colleagues”<sup>1</sup>, and that Requirement 7.2 links to these learning outcomes. However, the Standards could be clearer if they explicitly related the breadth of experience required by students to diversity.
- 3.5 The Standards may benefit from aligning to the Safe Practitioner Framework by requiring providers to ensure that students and educators are supported to “Proactively address discriminatory language, behaviour and microaggressions from colleagues, patients and other professionals.”<sup>2</sup>

#### *Additional comments*

- 3.6 Requirement 5 under Standard 1 provides for ensuring there are robust processes in place for raising and addressing concerns in terms of patient safety. Requirement 14.1 under Standard 3 states that providers must address any concerns identified through the quality assurance framework. Standard 3 may benefit from explicit provision for enabling students and staff to raise concerns and give feedback on the quality of education as part of the quality assurance framework.
- 3.7 Requirement 5.2 (“Providers must support staff and students who identify and raise concerns”) may be strengthened further by reference to enabling students and staff to raise concerns without fear of adverse consequences.
- 3.8 The requirements for assessments under Standard 4 (applicable to the providers that only deliver assessments) differ from the requirements relating to assessments for those organisations that provide both programmes and examinations. The GDC will need to be clear on the rationale for the differences

---

<sup>1</sup> Professionalism (Behaviours) 3, p.11, GDC The Safe Practitioner: A framework of behaviours and outcomes for dental professional education, Dentist

<sup>2</sup> Professionalism (Behaviours) 13, p.8, GDC The Safe Practitioner: A framework of behaviours and outcomes for dental professional education, Dental Technician

between the two sets of requirements. Should, for example, reference be made to any potential patient protection issues in relation to examinations and assessments (for those providers that only deliver assessments)? Should the standards covering assessments for organisations that deliver both programmes and examinations be explicit in requiring providers to be assured that students have demonstrated attainment (albeit including in-course assessment) across the full range of learning outcomes?

- 3.9 In addition, with regard to Standard 4, the use of the word 'programme' in 19.1 may be confusing, since this Standard refers to examinations. Also, it may be that requirements 19.1 to 19.6, which cover standard setting and criteria for entrance to the examination, do not follow on from the title in bold "The provider must subject programmes to independent external scrutiny by an appropriate individual."
- 3.10 The consultation document states that "There will be one set of standards and requirements, and we will make it clear to providers which ones are relevant to them and include examples of evidence that they can use in support. This consultation focuses on the full list of standards and requirements and the breakdown by professional group." The breakdown by group doesn't appear to be given in the accompanying draft Standards. Therefore, it is not possible to address one of the specific questions in the consultation document ("Question 7: Do you agree or disagree that presenting requirements in this way makes clear which of them apply to which dental professional group and examination providers?").
- 3.11 We note that although the consultation document refers to Appendix 2 (the draft Standards for Education) this appendix was not included in the document. The draft Standards were available on the website, but this reference to Appendix 2 may have caused some confusion and it was not immediately clear how to access the document. This may have presented a barrier to responding for some.

#### **4. Further information**

- 4.1 Please get in touch if you would like to discuss any aspect of this response in further detail.
- 4.2 You can contact us at:  
**Professional Standards Authority for Health and Social Care**  
16-18, New Bridge St,  
London,  
EC4V 6AG  
Email: [policy@professionalstandards.org.uk](mailto:policy@professionalstandards.org.uk)  
Website: [www.professionalstandards.org.uk](http://www.professionalstandards.org.uk)  
Telephone: 020 7389 8030