



Directors of Primary Care – all Health Boards
Health Board Primary Care leads – for distribution
to all NHS dental providers
British Dental Association Wales

18 April 2022

Dear Colleagues,

For dental therapists, dental hygienists and clinical dental technicians providing NHS treatment in NHS (Wales) general dental practices.

Following legal advice, it is now possible for dental therapists, hygienists, and clinical dental technicians to open and close an NHS course of treatment in Wales using the current FP17W form. This means that an NHS contract holder can allow professionals, who are GDC registered with these titles, to provide care to patients independent of the dentist. This will enable a practice to maximise the benefits of effectively using and deploying skill mix in the best interests of optimising access to patient care.

FP17W

The dental therapist, dental hygienist, and clinical dental technician must include their personal GDC number on the FP17W. A performer number must also be added to the FP17W as well to prevent the form being rejected by Compass. It would be sensible for the contract holder's performer number to be used. This is an interim measure until both a unique identifying number can be generated for direct access DCP's and appropriate amendments to the IT system changes have been implemented. The NHS Business Services Authority (NHSBSA) are currently working on this solution, and we will keep you updated on progress.

Scope of Practice and liability

The dental therapist, dental hygienist and clinical dental technician must only work within their GDC scope of practice. The contract holder takes responsibility for the delivery of the contract and must ensure that dental professionals should only perform tasks or make treatment decisions if they are trained, competent and indemnified to do so. All examinations, clinical decision-making, and treatments which fall outside any registrants' scope of practice should be referred to an appropriately qualified professional.

Supply and administration of medicines

Currently dental therapists and hygienist can only work under a patient group directive (PGD) or a patient specific directive (PSD) and cannot prescribe or supply any prescription only medicines including local anaesthetics.

The Human Medicines Regulations 2012 is currently under review as, in the future, it may be possible for dental therapists and hygienists to prescribe certain medicines under exemptions. There is a planned public consultation on the use of exemptions in dental practice, which is expected in the near future:

<https://www.legislation.gov.uk/uksi/2012/1916/contents/made>

During this transition period providers are requested to continue supporting their staff with PGD/PSD where required.

Practical Considerations

We appreciate that not all individuals will want to practice under these arrangements, but for those who wish to, it can be clinically rewarding for both the individual and the whole team.

This will be a gradual implementation process and, in the first instance, requires a conversation between contract holder and their team members regarding how this would support their patients. It is recognised that successful implementation will require further education and training, which should also be discussed within teams to identify learning needs. Health Education Improvement Wales (HEIW) will continue to provide the required training courses, resources and events to support skill mix and new ways of working for dental teams.

This important change will inevitably generate questions and we are developing an FAQ fact sheet to address key concerns.

Yours sincerely,

A handwritten signature in blue ink, appearing to be 'A. Dickenson', with a stylized flourish at the end.

Andrew Dickenson,
Prif Swyddog Deintyddol / Chief Dental Officer
Y Gyfarwyddiaeth Gofal Sylfaenol ac Iechyd Meddwl / Directorate of Primary Care and
Mental Health
Llywodraeth Cymru / Welsh Government