



Mr Tom Ferris
Chief Dental Officer for Scotland
Scottish Government
St Andrew's House
Regent Road
Edinburgh
EH1 3DG

By email

16 July 2020

Dear Tom

I am writing to you on behalf of the BDA's Scottish Dental Practice Committee to formally express our dissatisfaction over the lack of engagement and negotiation with the Committee over recent developments with the phased return to dentistry. I have detailed several of our recent frustrations below.

Following your letter of 24 June announcing that 13 July was the indicative date for Phase 3 of the return to dentistry, you indicated at our conference call the following day that you were in discussion with Finance colleagues, the Cabinet Secretary for Health and Sport and the Minister for Public Health, Sport and Wellbeing about securing additional financial support. This involved raising the General Dental Practice Allowance; however, no figure was mentioned until last Wednesday (8 July) therefore there was no opportunity for SDPC to discuss what the 30% increase (and 30% elevation of the GDPA cap) would mean in practice. An early indication of the proposed increase would have allowed members to comment on whether this was sufficient to restore NHS income to pre-Covid levels and help maintain the viability of practices. The committee's view is that a 60% increase to GDPA and the cap is required. We note that GMPs are receiving 100% of funding, and that NHS England recently announced that from 8 June onwards (when practices in England began providing face-to-face care again), 100% of contract value will be paid, with no abatement.

At just before 5pm on 8 July, we received a draft PCA with more details about Phase 3. We therefore had little opportunity to discuss the draft before our conference call the following afternoon. It should be remembered that committee members also work in practice and require sufficient time to respond. The PCA contained the instruction that open courses of treatment were to be finished and returned and that the costs were to be met by the Covid support payments. This had never been previously discussed and has caused considerable discontent among the profession following the release of the PCA to the profession on 10 July. These courses of treatment were started before the pandemic (some may be from 2019) but could not be completed for a variety of reasons, and expecting dentists to meet the costs is grossly unfair. Again, if the Committee had been given sufficient time to consider a draft PCA, we could have discussed this with you accordingly.

Along with the draft PCA, we also received a copy of the Statement of Dental Remuneration (SDR) Amendment No. 145 on the afternoon of 8 July. The SDPC Vice Chair had been involved in discussions about SDR 145 but, again, there was very little time to consider the SDR before our conference call on 9 July. The SDR includes elements that potentially jeopardise patient safety – for example, carrying out an examination without a 3-in-1 syringe, or detecting decay during an examination that cannot be effectively treated. Such instances may also lead to problems for the dentist with the GDC. As of 13 July, the SDR had not yet been formally issued to the profession but was already published on the Practitioner Services Division website.

Regarding SDR 145, we welcomed some of the revisions to the previous version, including the addition of triage codes. However, we continue to argue that the SDR should include financial support for lab fees for dentures, and that this should not be deducted from the Covid-19 financial support. This too has caused much resentment among the profession.

We understand that these are exceptional times, and that on occasion there may be little time to negotiate fully and to reach a consensus. However, repeatedly sending important documents which are either a “done deal” or with very little time to consider and discuss does not represent meaningful engagement or negotiation. Both myself and the SDPC Vice Chair have received sustained vitriolic abuse on the Scottish Dental Practice Owners online platform as we have been personally accused of failing to negotiate effectively with the Scottish Government. We have tried to engage constructively and effectively with the Scottish Government, but our professional integrity (and that of SDPC and the BDA) has been openly and repeatedly questioned by others in the profession due to the lack of engagement. This situation is highly stressful and clearly untenable.

SDPC and the wider BDA are keen to contribute positively and constructively as dentistry continues its phased return to practice. We therefore urge you to ensure that, in the future, you allow SDPC sufficient time to consider any proposals fully to allow an informed discussion and to give SDPC its place as the formal negotiating body on behalf of GDPs.

Finally, we continue to urge you to communicate regularly and clearly with the profession to ensure they are up to date with developments. There is considerable uncertainty and anxiety around the phased return to dentistry, and colleagues are calling for transparency regarding financial support and guidance.

I look forward to your response at the earliest opportunity.

Yours sincerely

A handwritten signature in black ink, appearing to read 'David McColl', with a stylized, cursive flourish.

David McColl
Chair, BDA Scottish Dental Practice Committee

cc. Minister for Public Health, Sport and Wellbeing