

Rt Hon Yvette Cooper MP Secretary of State for the Home Department Home Office

Rt Hon Wes Streeting MP Secretary of State for Health and Social Care Department for Health and Social Care

Sent by email

15 July 2025

Dear Secretaries of State,

I am writing to express serious alarm at the proposed changes to the Immigration Rules announced earlier this month which have created enormous concerns in the dental community.

The removal of key occupational codes—3213 (medical and dental technicians) and 6113 (dental nurses)—from the list of eligible roles for the Skilled Worker visa will have a devastating effect on dental practices already struggling to recruit staff and provide dental services. These changes, due to take effect on 22nd July, will have an enormous impact on dental care provision throughout the UK and risk exacerbating the crisis in NHS dentistry at a time when improving access to dental services is rightly a major policy objective of the Government.

These codes encompass a wide range of dental care professional (DCP) categories: dental therapists, dental hygienists, dental technicians, clinical dental technicians, orthodontic therapists, and dental nurses. Together with dentists, these professionals form teams essential to providing safe and efficient dental care to the UK population. Without them, the system cannot function.

Moreover, these occupational codes are also used by overseas dentists who are waiting to sit the professional registration exams provided by the General Dental Council (the Overseas Registration Exam) and the Royal College of Surgeons of England (the Licence in Dental Surgery). These exams are highly oversubscribed, often taking candidates years to complete. During this period, many overseas-qualified dentists work in the above DCP categories, subject to registration with the GDC, making a vital contribution to patient care and building familiarity with the UK system. They provide a valued and necessary service, especially in the absence of a domestic workforce which could fill this void.

The removal of these categories will therefore lead to a huge number of clinicians who will be unable to take up posts, contribute to and integrate into NHS care, before eventually receiving a visa as a dentist. The temporary transitional arrangements for individuals already on these visas do not provide enough clarity and reassurance either. Aside from the personal devastation of the individuals currently going through UK processes, the consequences of this policy will be felt directly by patients at a time when the NHS 10-Year Plan aims to improve access to NHS dentistry.

The Plan rightly recognises the need to make better use of the wider dental team and maximise the capacity and capability of the wider workforce. These changes risk undermining these objectives.

British Dental Association 64 Wimpole Street, London W1G 8YS Telephone: +44 (0)20 7935 0875 email: enquiries@bda.org web: www.bda.org The BDA calls on the Department for Health and Social Care and the Home Office to work together urgently to address this situation by:

- Retaining occupational codes 3213 and 6613 in the Immigration Rules without changes, so that individuals currently applying for visas will receive them;
- Failing this, including occupational codes 3213 and 6613 in the new temporary shortage list as of 22nd July 2025.

The BDA supports the Government's approach for domestic workforce development. We have engaged throughout the last few years with the discussions on long-term workforce planning in dentistry and will continue to do so. Ultimately, we should be looking to grow our own workforce, but this will not happen overnight. It takes around two years to train a dental nurse or technician; around three years to train a hygienist or therapist; and around five years to train a dentist. When developing the forthcoming workforce plan it is also crucial the Government gives full consideration to the necessary funding required to train additional numbers needed in each professional category. In the meantime, we are reliant on help from outside the UK.

Finally, the success of any long-term workforce strategy will depend not just on training more professionals, but on retaining them. That requires urgent reform of the NHS dental contract, which continues to drive clinicians out of the system – a key Labour manifesto promise, which must be delivered without delay.

In the meantime, it is of utmost importance to ensure the above overseas-qualified professionals can continue to support NHS dental patient care.

I look forward to receiving your response, and my colleagues and I stand ready to work with both Departments to ensure NHS dentistry has a workforce that is fit for purpose, both now and in the future.

Yours sincerely,

Eddie Crouch Chair British Dental Association

CC Stephen Kinnock MP, Minister for Care Karin Smyth MP, Minister of State for Health Jason Wong, Chief Dental Officer for England Tom Ferris, Chief Dental Officer for Scotland Andrew Dickenson, Chief Dental Officer for Wales Caroline Lappin, Chief Dental Officer for Northern Ireland