

To:

Mr Mike Nesbitt MLA
Minister
Department of Health
Castle Buildings, Stormont
Belfast
BT4 3SQ
By email: Private.Office@health-ni.gov.uk

15th January 2026

Re. Regulatory oversight and dental tourism

Dear Minister

I wish to bring to your attention growing concerns regarding the practice of dentistry in 'pop-up' clinics such as hotels, and latterly in bricks and mortar premises without those premises being registered with and regulated by RQIA.

Specifically, while RQIA is responsible for registering establishments that offer private dental care and treatment, it is their view that existing legislation appears to present a significant loophole which is being exploited, whereby RQIA is unable to register a service where the '*dental health professionals*' are not registered with the General Dental Council, such as dentists from overseas. (In order to practise dentistry legally in the UK, they must be registered with the GDC).

The following legislation has been quoted by RQIA:

'a person who is registered as a member of any profession which is regulated by a body mentioned in section 25(3) of the National Health Service Reform and Health Care Professions Act 2002 or who is a clinical psychologist or child psychotherapist(d);'

It is important to emphasise that 'dental consultations' and 'dental makeovers' are being openly and frequently advertised as taking place in what are unregistered and unregulated premises. We are very concerned that 'the practice of dentistry' is happening in unregistered establishments in Northern Ireland, beyond merely the marketing of overseas dental services. Simply looking inside a patients mouth and examining their teeth and gums with the intention of offering dental treatment will amount to the practice of dentistry which is illegal unless carried out by a registrant authorised to do so under the Dentists Act 1984.

As you will see from the enclosed correspondence from the four LDCs in Northern Ireland to RQIA, dentists right across Northern Ireland are extremely concerned at the current situation. There is a very real sense of double-standards being applied, and a significant regulatory loophole which is potentially putting the public who are accessing these services from unregistered and

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unregulated premises and individuals at real risk of harm. This is in direct contrast to the high standard of regulatory oversight of legitimate registered dental premises.

Having received expert advice from our Compliance team, there is a view that RQIA does have the legal powers to regulate the aforementioned premises.

According to the Health and Personal Social Services (Quality, Improvement and Regulation) (Northern Ireland) Order 2003" there is a "Requirement to register" (Para 12) for:-

"any person who carries on or manages an establishment or agency of any description"

as

"without being registered under this Part in respect of it (as an establishment or, as the case may be, agency of that description) [THEY] shall be guilty of an offence."

And, under Para 8, it defines an "establishment":-

"Any reference to a description of establishment in the following provisions of this Order is a reference to—

- (c) an independent clinic;
- (d) an independent hospital;

It is important that we receive urgent clarity on the issue of regulation of pop-up and bricks and mortar premises, not least to ensure the public is properly protected in all premises where dentistry is provided.

In addition, for some time we have highlighted the need for DoH to issue clear guidance to support and protect dentists who are regularly having patients present to dental practice who have received dental treatment overseas, including cases where such private treatment has been against the advice of their GDP, and where all too often, significant remedial treatment is required. We have written separately to the CDO on this matter.

Clearly, there is also an important role for the GDC as the Professional Regulator to properly exert its enforcement powers against any illegal practice of dentistry where this is happening. Whilst we are aware intelligence is being regularly passed between RQIA/DoH and GDC, we are not aware of any degree of enforcement actions having been taken forward in Northern Ireland, despite how common this activity appears to have become.

Again, we would ask for assurances that we have the proper powers in place for enforcement action to be taken in any scenario where dentistry is being carried out by non-GDC registered individuals in Northern Ireland, and that these powers are being fully exercised as appropriate here.

Without wishing to pass comment on any specific cases, the existing regulatory regime -either in application or design -is falling short, not least the current inability of RQIA to regulate certain premises where the practice of dentistry is being carried out. Moreover, a more equitable and robust approach to enforcement is required as a deterrent to any provider who would seek to carry out dental services illegally.

Alongside this, is the irony that low-risk established dental practices are being over-burdened to adhere to gold-plated regulatory standards akin to their (flawed) designation as 'independent

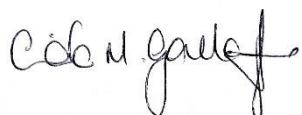
hospitals' and all the extra cost that goes with it, while other high-risk and illegal operators appear to be going unchecked.

We would ask for your intervention on these important matters, both on the issues directly within DoH's remit, and in engagement with the GDC and others to ensure an approach which adequately protects the Northern Ireland public.

Yours sincerely



Paul Brennan
Chair, NI Council



Ciara Gallagher
Chair, NI Dental Practice Committee

Cc:

Theresa Thorp, Executive Director, Regulation, GDC
Brige Donaghy, Chief Executive RQIA
Stephen O'Connor, Assistant Director RQIA
Caroline Lappin, Chief Dental Officer

Encs. *Joint letter from all Northern Ireland Local Dental Committees to Stephen O'Connor, RQIA, emailed on Friday 9th January 2026*

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