

Briefing note: Meeting with HIW to discuss the registration process for those practices which undertake private dentistry

Present: Andrew Pryse, Katrina Clarke, Caroline Seddon, Christie Owen

Date: 23 October 2017

Rationale

This meeting arose as a follow-up to the briefing meeting provided by Mr Pryse of HIW in early October and also various concerns that had been transmitted to BDA Wales from some members. We covered quite a lot of ground to do with the registration process and we emphasised approaches to communication. Topics covered are summarised below:

Communications

We managed to impress upon Mr Pryse the stress this process is causing some of our members and that the tone of HIW communications has exacerbated this. In other words, he and his staff should treat the applicants a little more humanely. We talked about his September letter, which he described as “a shot across the bows”, which is very telling. By the end we had impressed upon him that practice owners were not being difficult but that it was a challenging process both in and of itself and especially in the context of poor morale within the profession. We also gained some insight into the challenges that his team was facing in undertaking this work and we were appropriately sympathetic.

We talked about future communications - both theirs and ours - and we believe we have achieved a constructive approach time will tell. BDA has put out two news items via the –e-newsletter and will continue to send out new updates periodically leading up to the deadline of 31 March 2018.

Additional burdens caused by the new regulations

Katrina raised the issue of extra HIW fees for ‘major’ changes to practices – we think this could put off practices undertaking such work if they are not properly compensated by the Health Board through their funding. Not much sympathy was shown on this issue. Katrina also talked about duplication of regulation, and that many of the practices going through the new process for private practice registration already are subject to various other regulation and QA processes, owing to their NHS contracts and HIW inspections. Mr Pryse did appear sympathetic to this point, but only inasmuch as a) the new process was asking for things that should already be put in place, and b) that at stage one if the practice appeared to be in good standing it would not require HIW inspection as part of phase 2.

Submission of accounts

HIW is holding firm on the need to submit accounts and this was reiterated in the meeting. This what Mr Pryse said in a recent email to Richard Harris:

“In the case of practices that are businesses registered with Companies House they have to submit their last two annual reports which will include accounts anyway. So this is really only an issue for sole traders or expense sharing partnerships that are not registered with Companies House. The other reason is that we want to make this as straightforward as possible for both the applicants and HIW. If they have an accountant then they probably have a set of accounts. Why would it be necessary to ask the accountant for a letter of financial viability (and incur an additional charge) when we’re happy with the accounts? Of course if there are not accounts available then we would look to the RI/RM to demonstrate how they ensure financial viability which could be a letter from their bank manager for example which is what happens for small independent healthcare providers in Wales.”

Identity of Registered Manager

We discussed the issue of who should be the Registered Manager and how they would evidence their management proficiency Mr Pryse said it would be perfectly proper for the practice owner to be the registered manager, as well as the responsible individual, so long as they could describe their day to day oversight of the practice management. He talked about ensuring quality and safety as part of that management role (in addition to the policies and procedures etc) Similarly, he seemed satisfied with submission of evidence of learning on the job and indicated that management certificates were not compulsory.

BDA Guidance

We have been working with Richard Harris and we have completed the new form with the various guidance notes cut and pasted into it. Richard is preparing a detailed set of guidance to go with this. We anticipate this should be available on the website in the next week.

Something we do not think is clearly communicated by HIW is that this is a two-stage process – even their flow chart does not show it! Our guidance needs to highlight this.

Caroline Seddon

25 October 2017