

Advice for Dental Professionals on Raising Concerns

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1. About this advice

- 1.1 [Principle 8](#) of the [Standards for the Dental Team](#) is to 'Raise concerns if patients are at risk'. This advice sets out our expectation that all dental professionals will raise concerns if patients or colleagues are at risk and will take measures to protect them. This applies to all dental professionals, regardless of what role you have in the dental team.
- 1.2 This advice is designed to provide advice on:
 - Your responsibilities regarding raising concerns;
 - When you should raise a concern;
 - How you can raise a concern; and
 - The sources of help and advice that are available to you.
- 1.3 It also includes specific advice for managers and employers regarding the duty to:
 - Encourage and support a workplace culture where staff can raise concerns openly and without fear of reprisal; and
 - Promptly investigate concerns that are raised with you or in your workplace.
- 1.4 While this advice provides help and suggestions about what to do and who to approach, it cannot be exhaustive. You will need to use your professional judgement to apply it to your particular circumstances. If you are unsure about what to do, or how this advice applies to your situation you should contact one of the organisations in the 'useful contacts' section at the end.

2. What is 'raising a concern'?

- 2.1 Raising a concern is when you speak up or provide information about something that you believe could be putting others at risk. In the dental team, this could involve information about something which is posing a risk to patients, but it could also be something which is posing a risk to other colleagues.
- 2.2 Patients, or colleagues, might be at risk because:
- Of the health, behaviour or professional performance of a colleague;
 - Of any aspect of the clinical environment where treatment is provided; or
 - You have been asked to do something that you believe conflicts with your duty to put patients' interests first and act to protect them.
- 2.3 Raising a concern is different from making a complaint about how you have been treated at work. When you raise a concern, you will usually be reporting something that you have witnessed which puts patients or colleagues at risk. If you have a complaint about how you personally have been treated at work, you should follow the appropriate internal complaints or grievance procedures.
- 2.4 In some cases, it may be difficult to work out whether you have a concern which needs to be raised. For example, maybe:
- You suspect some wrongdoing, but have not actually witnessed it;
 - You think there is a risk to patients, but nothing has happened yet; or
 - The colleague/professional in question has had different training from you and may just do things differently.
- 2.5 You may also question whether or not to raise a concern because of:
- Feelings of loyalty to your workplace and/or colleagues, or fears about seeming disloyal;
 - Fear that you will be 'letting the side down';
 - Fear that you may be victimised by your colleagues or managers;
 - Not knowing who in your workplace to raise concerns with;
 - Feeling unable to approach management with your concerns;
 - Fear that raising concerns will affect your workplace targets; or
 - You have less experience, training and/or responsibility than other team members.
- 2.6 When deciding whether or not you should raise your concern, here are some questions which might help you:
- If this person was treating a member of my family, or one of my friends, would I be concerned?
 - Is the person's worrying behaviour repeated?
 - Does the person in question have a health or dependency issue that is putting others at risk?
 - Are the actions of the person posing a risk to children or vulnerable adults?

- What might happen in the short- term, or long-term if I do not raise my concern?
- If I was asked to so do, could I justify why I did not raise this concern?

2.7 If you are in doubt about whether or not you have a concern that you should raise, you could consider contacting:

- Your professional association;
- Your indemnity provider/defence organisation; or
- The GDC's confidential helpline - **0800 668 1329**, which is run by Public Concern at Work¹ (PCaW) – a charity that provides free, confidential advice to people who are concerned about wrongdoing at work

¹ For contact details see page 14 of this advice note.

3. The duty to raise a concern

- 3.1 Every registered dental professional must put patients' interests first and act to protect them. This means that you must raise a concern if you believe patients or colleagues are at risk, and you must act on any concern that is raised with you.
- 3.2 This is set out in the [Standards for the Dental Team](#). You can find more information on the professional duty to raise concerns, including some Frequently Asked Questions, in the [Focus on Standards](#) section of our website.
- 3.3 The GDC appreciates that in some cases, it may be a difficult decision to raise a concern, especially where the concern relates to the conduct of colleagues. However, if you do have a concern, you must raise it. This may allow poor practice to be identified and tackled without there being a serious risk to the safety of patients or colleagues. You also have a professional responsibility to do this regardless of whether you are in a position to control or influence what happens in your place of work.
- 3.4 If you have a concern, you should raise it as soon as possible. If you believe that patients or colleagues may be at risk and do not raise this, you may be in breach of your professional responsibilities and could put your own registration at risk.
- 3.5 Raising a concern which turns out to be nothing serious will not be viewed badly as long as it is done for the right reasons and with patients' (or other colleagues') interests in mind. You will be able to justify raising a concern if you do so honestly, on the basis of reasonable belief and through appropriate channels, even if you are mistaken².
- 3.6 It is also important that every member of the dental team takes an active part in helping to create an open and transparent culture in their workplace, so that all those who work there feel able to raise any concerns that they may have.
- 3.7 If you do anything to prevent a colleague from raising a concern, or treat staff or colleagues badly who have raised a concern, you would be breaching the standards and could find your own registration at risk.
- 3.8 You must not accept any contract or agreement with your employer which tries to stop you from raising concerns about the safety of patients or colleagues. Contracts or agreements are void if they try to stop an employee from raising a valid concern.
- 3.9 If you are unsure of what to do, or are worried about raising your concern, you can contact the GDC's confidential helpline – **0800 668 1329**, which is run by Public Concern at Work (PCaW) (see section 9 for contact details). PCaW is a charity that provides free, confidential advice to people who are concerned about wrongdoing at work and not sure whether, or how, to raise their concern. They will advise you but will not pass any information on to us.
- 3.10 Remember, raising a concern which turns out to be nothing serious will not be viewed badly as long as it is done for the right reasons.

² The law provides legal protection against victimisation or dismissal for individuals who reveal information to raise genuine concerns and expose malpractice in the workplace. Refer to the Public Interest Disclosure Act 1998. www.pcaw.org.uk/guide-to-pida

4. How to raise a concern

- 4.3 If you have a concern, there are a number of ways that you can raise this. The advice below should help you decide on the most appropriate way of raising your concern. Remember you do not need firm evidence of malpractice before raising a concern, however the more information you can provide the better your concern will be understood.
- 4.4 If you need any further information, help or advice, you may wish to contact the GDC's confidential helpline on **0800 668 1329** or one of the organisations listed in the 'Sources of help and advice' section at the end of the advice.

Raise the concern internally

- 4.5 It is usually most effective to raise your concern within your workplace wherever possible. This is where any problem can most easily be sorted out.
- 4.6 If you are self-employed and work in different practices, it is best to follow the policy that is in place in the place in which you have concerns.

Look at your workplace's 'whistleblowing' or 'Speak up' policy

- 4.7 Every workplace should have written procedures in place to help staff to raise concerns. Usually this will be in a 'whistleblowing' or 'speak up' policy³ which will set out what both the staff member and the employer should do when a concern needs to be raised or an incident needs to be reported.
- 4.8 The policy should set out how you can raise your concern and how your concern will be handled. It may provide information such as:
- A named person within your workplace who can act as a contact for the organisation, and who you can talk to about your concern;
 - What you can expect from your employer, including the protection available to you (such as the approach to confidentiality and a zero tolerance of reprisal), who will handle your concern, how long an investigation should take and how they will keep you informed of the progress and/or outcome; and
 - Any procedure in place for escalating your concern.
- 4.9 If you feel unable to raise your concern with the named person (maybe because your concern relates to them), you should try raising your concern with another senior member of staff in the organisation.
- 4.10 If you have raised your concern internally, but it is not addressed in a reasonable timeframe, or you are not satisfied with the response, you should escalate your concern to someone more senior. Your workplace's policy may tell you who you can escalate your concern to in these circumstances.
- 4.11 If you need any further information, help or advice, you may wish to contact the GDC's confidential helpline on **0800 668 1329** or one of the organisations listed in the 'Sources of help and advice' section at the end of the advice.

³ The policy may differ in name in different organisations, however it should have a clear explanation of the type of issues that can be raised.

If your workplace does not have a whistleblowing policy

- 4.12 Even if your workplace does not have a whistleblowing policy, you should try to raise the matter with someone within your organisation. This might be by talking to your line manager or someone senior in the organisation, such as a practice manager.
- 4.13 If you need any further information, help or advice, you may wish to contact the GDC's confidential helpline on **0800 668 1329** or one of the organisations listed in the 'Sources of help and advice' section at the end of the advice.

If you can't raise your concern in your workplace

- 4.14 When raising a concern, the first point of call will usually be within your workplace. However in some cases this may not be appropriate or possible, for example if your concern relates to someone internally who would usually be handling the concern.
- 4.15 If your concerns are about someone providing NHS treatment, you should check to see if your NHS Regional Team or health board has a whistleblowing policy. Alternatively, there may be appointed people in your NHS Regional team or health board's policy who you can raise your concerns with.
- 4.16 If you have raised your concern but it is not addressed in a reasonable timeframe, or you are not satisfied with the response, you should escalate your concern to someone more senior. The NHS Regional Team's or health board's whistleblowing policy should tell you who you can escalate your concern to in these circumstances.
- 4.17 Local support may also be available from those in dental advisory roles or the dental deaneries.
- 4.18 If you need any further information, help or advice, you may wish to contact the GDC's confidential helpline on **0800 668 1329** or one of the organisations listed in the 'Sources of help and advice' section at the end of the advice.

When to contact the GDC or other regulator

- 4.19 The GDC is not normally going to be your first point of call. This is because as the regulator, we deal with issues where a dental professional might not be fit to practise dentistry. We cannot resolve issues within the workplace.
- 4.20 However, in some cases, you may need to contact a regulator, such as the GDC or one of the regulators listed in the useful contacts section, who has the authority to investigate the matter.
- 4.21 You may need to contact a regulator if:
 - there is an immediate or serious risk to patients or colleagues;
 - you cannot raise the issue with someone within your workplace, or locally, because you believe them to be a part of the problem;
 - you have raised your concern in your workplace or locally, but nothing has been done and you still believe patients and/or colleagues are at risk; or

- you think a colleague may no longer be fit to work as a dental professional because of something they have done, their professional skills or their health, and that they pose a risk to patient safety.
- 4.22 Examples of things that pose a risk to patient safety that you might report to us include:
- Providing very poor treatment;
 - Not having professional indemnity insurance;
 - Cross-infection issues (for example, using dirty equipment); or
 - Being under the influence of alcohol or drugs.
- 4.23 If you see or suspect that a colleague is breaking the law, you should report this to the police.
- 4.24 If you need to raise a concern with the GDC, you can contact our fitness to practise team using [this link](#).
- 4.25 If you have a concern about another healthcare professional, you should contact the appropriate regulator for that profession. If you have a concern about a particular practice, you should contact the appropriate systems regulator.
- 4.26 If you are unsure about whether to contact an external body you can contact the GDC's confidential helpline on **0800 668 1329**.

Useful tips:

- 4.27 Regardless of how you raise your concern, there are a couple of suggestions you should consider:
- You should try to make a record of events that led to your concern when, or as soon as possible after, they happen;
 - Your record of events should be as detailed as possible;
 - Your record of events should be factual and not influenced by personal feelings or opinions; and
 - When making a record of events, and when raising a concern, it may be useful to try to refer to the Standards for the Dental Team; does the situation go against the standards? If so, how?

Anonymity and confidentiality

- 4.28 Raising concerns openly is often the best option if you have confidence in your organisation's culture and attitude to raising concerns. However, there may be circumstances when you would prefer to speak to someone confidentially first, this means that you ask the organisation not to disclose your identity without your consent (unless they are required to do so by law). You should understand that there may be times when your personal evidence is essential and it is not possible to resolve a concern without revealing your identity. In such cases, the organisation or person you are raising your concern with should discuss with you how it may be possible to proceed with the case to get the best outcome.

- 4.29 Please remember that if you do not give your name at all (and therefore you are raising a concern anonymously) it will be much more difficult to look into the matter. The organisations or person you are raising the concern with will not be able to protect your position or to give you feedback. Therefore it is possible that the same assurances will not apply if you report a concern anonymously.

How will the GDC handle your concerns?

- 4.30 The GDC is committed to ensuring that concerns raised with us will be taken seriously. Once you have raised your concern with the GDC, a member of our fitness to practise team will consider the information you have provided to see whether it is an issue that the GDC can deal with. The types of issues we can deal with are conduct, performance and health concerns which suggest that our standards have been breached and that as a result, the dental professional may not be fit to practise dentistry.
- 4.31 If the issue falls outside of our remit, we will write to you with an explanation of why we cannot take the case forward, and will provide some advice on how else you could raise your concerns.
- 4.32 If we decide that we can look at the issues you raise, the GDC will allocate a named Caseworker to investigate your concerns.
- 4.33 It is at this stage that the GDC will inform the dental professional that concerns have been raised about their fitness to practise, and will send them a copy of the letter or email that you have sent us. However your details as the person who has raised the concern will only be shared with them if you have given us your consent to do so.
- 4.34 You can find more details on what information you may be asked to give us, whether you can remain anonymous throughout the process, and what happens if you do not give your consent, in the next section.
- 4.35 For more detail on the fitness to practise process, see [how we investigate allegations made against dental professionals](#) on our website.

Why the GDC may need information from you

- 4.36 The GDC needs a certain amount of information in order to investigate a case. We will try and get this information from a range of sources, which will usually include the person who raised the concern with us originally. If the GDC does not have enough information about a case to suggest that a dental professional may not be fit to practise, we will close the case.
- 4.37 For example, when you first raise a concern with us, we will need enough information to be able to identify the dental professional you are concerned about, as well as information from you to explain why you are concerned about their performance or behaviour.
- 4.38 When we are investigating, we will need to gather more information to assess whether the dental professional in question has breached our standards. As the person who raised the concern, it would help our investigation if you could provide further information about your concerns. This could include copies of any supporting documents (including details of whether you have raised the concern internally or locally) or details of where

those documents are held and details of others who may also have information about the concerns that have been raised.

- 4.39 If you have provided information to us anonymously we will still investigate but it may not be possible to progress the case without more information. If you ask us to keep your identity confidential, we will not disclose your identity without your consent unless we are required to do so by law (for example where a vulnerable person is at risk and your evidence is essential).
- 4.40 In some cases, it may be necessary to ask you to act as a witness – perhaps by providing a written witness statement or giving evidence at a Practice Committee hearing. If we think this will be necessary, a dedicated Witness Liaison Officer will contact you to discuss the case and give you information about the next steps.

Making your concerns public

- 4.41 You may feel that you need to make your concerns public. You may consider doing this if:
- You have done all that you can to raise your concern, both locally and with the relevant regulators/authority; and
 - Nothing has been done and/or you have a good reason to believe that patients or colleagues are still at risk.
- 4.42 If you do decide to make your concern public, it is vital that you do not breach patient confidentiality. Patients have the right to confidentiality and you have a professional responsibility to maintain this.
- 4.43 If you are thinking of going public with a concern, you should seek advice from your defence organisation, professional association, trade union, or the GDC's confidential helpline on **0800 668 1329** before you do this.

5. Investigating concerns – advice for employers and practice managers

Responsibility to handle concerns

- 5.1 As an employer or a manager, you will have extra responsibilities. These include appropriately handling concerns that are raised with you, and promoting a culture of openness in the workplace so that staff feel able to raise concerns.
- 5.2 Your responsibilities are set out in more detail in principles 8.3 and 8.4 of the [Standards for the Dental Team](#)
- 5.3 As set out in the standards, if a member of your team raises a concern, you must:
 - take the concerns seriously;
 - maintain confidentiality when appropriate;
 - investigate promptly and properly and make an unbiased assessment of the concern;
 - keep the staff member who raised the concern advised of progress, explaining any action taken or reasons for not taking action; and
 - ensure that you monitor the action you take to solve the problem.
- 5.4 Failure to support a culture where staff feel able to raise concerns, and handling concerns badly when they are raised, may breach the standards and could put your registration at risk. This could include attempting to deter someone from making a concern, showing disrespect to staff who are raising a valid concern, bullying staff who have raised a concern or unreasonable behaviour when responding to concerns.

Training

- 5.5 Leaders and managers should foster a culture of openness in the workplace through your policies and procedures, beginning with staff training and induction.
- 5.6 You and your staff should stay up-to-date on raising concerns by periodically refreshing your communications, internal policies and training. It is also important that managers feel confident in handling and investigating concerns raised with them. This could be done through in-house training, or by carrying out CPD in raising concerns.

Policies and procedures

- 5.7 If you employ, manage or lead a team, you must make sure that there is an effective procedure in place for raising concerns. This procedure should set out how staff should raise concerns and what they can expect from you and/or the management in the practice when handling concerns. Specifically, a whistleblowing policy could include:
 - The name of a person in the practice who staff can talk to about any concerns they may have;
 - The member of staff who will be responsible for handling any concerns raised by staff;
 - Details about how concerns will be looked into, such as how long this could take;

- Details about how staff will be informed of the outcome, including what information or explanations will be provided if their concerns are not being taken forward;
 - Any procedure in place for staff who wish to escalate their concerns; and
 - Any procedure in place for reporting incidents.
- 5.8 You should take steps to ensure that all staff are aware of the procedure and have access to it, and that they can and do raise their concerns in line with it. You should also ensure that you handle any concerns raised with you in line with the procedure so that staff know what will happen when they raise a concern.
- 5.9 You should make sure that the whistleblowing policy in your workplace complies with best practice⁴, and that it is reviewed periodically to make sure it is up-to-date and effective.

An open and transparent workplace can improve services

- 5.10 Having staff raising concerns in a workplace does not need to be seen negatively. Concerns raised by staff can be used in a positive way to improve services in a workplace.
- 5.11 Employers, managers and senior staff should consider ways in which they can foster an open and transparent culture in a workplace where concerns can be raised by staff, and feedback used constructively to improve the service to patients and staff morale.
- 5.12 Ways in which management can help to create a positive attitude to raising concerns in a workplace could include:
- Regular practice meetings where staff are encouraged to discuss any concerns they may have;
 - Promote learning through mistakes;
 - Having an appointed person for dealing with concerns and/or (depending on the size of the practice) a nominated person that staff can approach informally to discuss concerns;
 - Clear assurances on the protection for individuals who raise concerns including options for confidentiality
 - A concerns box that staff can use to voice concerns;
 - Implementing a 'buddy' system for new members of staff; or
 - Peer-to-peer reviews as part of the appraisal process.

⁴ For example see the [Whistleblowing Commission Code of Practice](#)

6. Advice for students

- 6.1 Information for students on raising concerns is set out in our [student fitness to practise](#) guidance.

7. Education providers

- 7.1 You can find information, including some frequently asked questions, on raising concerns about an education or training provider [here on our website](#).

8. Sources of help and advice

Where can I get help and advice?

8.1 There may be times when you are not sure whether to raise concerns about practices or behaviour that you have seen. There are a number of possible sources of help including:

- Colleagues;
- Your indemnifier/defence organisation;
- Your employer;
- Your professional association;
- Local health board, Regional Team or Commissioner of services
- Public Concern at Work;
- NHS Whistleblowing helpline;
- The GDC's confidential helpline;
- The Focus on standards section of the GDC website; or
- An organisation listed in the 'useful contacts' section below:

Useful contacts

Advice and help

Public Concern at Work
Website: www.pcaw.co.uk
Helpline: 0800 668 1329

NHS Whistleblowing Helpline
Website: www.wbhelpline.org.uk
Phone: 0800 724 725

Regulatory and Investigatory bodies

General Dental Council
Website: www.gdc-uk.org
Fitness to Practise [online form](#)
Phone: 0845 222 4141 or 020 7887 3800

Care Quality Commission
Website: www.cqc.org.uk
Phone: 03000 616161

Regulation and Quality Improvement Authority
Website: www.rqia.org.uk
Phone: 028 9051 7500

Healthcare Inspectorate Wales
Website: www.hiw.org.uk
Phone: 0300 062 8163

Healthcare Improvement Scotland
Website:
www.healthcareimprovementscotland.org
Phone: 0131 623 4300

General Medical Council
Website: www.gmc-uk.org
Phone: 0161 923 6602
Confidential Helpline: 0161 923 6399

Health and Care Professions Council
Website: www.hpc-uk.org
Phone: 0845 300 6184

Nursing and Midwifery Council
Website: www.nmc-uk.org
Phone: 020 7637 7181

Monitor

Website: www.monitor-nhsft.gov.uk

Phone: 020 7340 2400

NHS Counter Fraud and Security Management Service

Website: www.nhsbsa.nhs.uk

Fraud and corruption line: 0845 126 8000

Professional Associations

British Dental Association

64 Wimpole Street

London

W1G8YS

Phone: 020 7935 0875

enquiries@bda.org

Website: www.bda.org

British Society of Dental Hygiene and Therapy

Smile House, 2 East Union Street

Rugby

CV22 6JA

Phone: 01788 575050

enquiries@bsdht.org.uk

Website: www.bsdht.org.uk

British Association of Dental Nurses

PO Box 4, Room 200

Hillhouse International Business Centre,

Thornton-Cleveleys

FY5 4QD

Phone: 01253 338360

Website: www.badn.org.uk

British Association of Dental Therapists

C/O 8 Salmons Fields Business Village,

Royton

Oldham

OL2 6HT

Phone: 0161 665 5878

Website: www.badt.org.uk

Dental Technologists Association

2 Wheatstone Court

Waterwells Business Park

Gloucester

GL2 2AQ

Phone: 01452 720413

Website: www.dta-uk.org

British Association of Clinical Dental

Technology (BACDT)

44-46 Wollaton Road, Beeston

Nottingham

NG9 2NR

Phone: 0115 9575370

Website: www.bacdt.org.uk

Orthodontic National Group

Website: www.orthodontic-ong.org