

Ms Amanda Little
GDC Examinations Manager
IQE Review
The Education Directorate
37 Wimpole Street
LONDON W1G 8DQ

Education and Registration
Directorate
Pre-Registration Division
Overseas
Telephone: +44 (0)20 7572 2317
Facsimile: +44 (0)20 7572 2506
e-mail: overseas@rpsgb.org

2 October 2006

Dear Amanda

Consultation on Proposed Developments to the System of Assessing Overseas (non-EEA) Dentists Wishing to Join the UK Dentists' Register

Thank you for the opportunity to comment on the above consultation.

The Royal Pharmaceutical Society of Great Britain (RPSGB) is the professional and regulatory body for pharmacists in England, Scotland and Wales. It also regulates pharmacy technicians on a voluntary basis, which is expected to become statutory for England and Wales under anticipated legislation.

The primary objectives of the Society are to lead, regulate, develop and represent the profession of pharmacy.

The Society leads and supports the development of the profession within the context of the public benefit. This includes the advancement of science, practice, education and knowledge in pharmacy. In addition, it promotes the profession's policies and views to a range of external stakeholders in a number of different forums.

The Society has responsibility for a wide range of functions that combine to assure competence and fitness to practise. These include controlled entry into the profession, education, registration, setting and enforcing professional standards, promoting good practice, providing support for improvement, dealing with poor performance, dealing with misconduct and removal from the register.

The RPSGB is similar to the GDC in that once a pharmacist is on the Society's register the Society cannot limit a pharmacist's practise to a specific field or to a supervised environment. From day one on the register the pharmacist could be the person in charge of a retail pharmacy business and solely responsible for the provision of all pharmaceutical services from a community pharmacy.

Question 1

The Society agrees with Statement a)

In Statement b) perhaps reference should be made to the assessments being sufficiently challenging/probing to ensure that only dentists who are safe to practise are admitted to the register.

Question 2

What Should the Overseas Dentist Be Able to Prove through Assessment?

The Society agrees with Statements a, b and c.

The Society does not agree with Statement d)

The Society is of the opinion that safe and effective clinical practice is inextricably linked to knowledge of the operational details of clinical governance, local NHS requirements and to the ethical and legislative framework of dental practice in the UK. To work safely and effectively in the UK an overseas qualified dentist must know the permitted activities of the different members of the dental team, a knowledge of the organization and provision of healthcare in the community and in hospital and an understanding of patients' rights, particularly with regard to confidentiality and patient consent.

We are also of the opinion that any new healthcare registrant should demonstrate to the regulator that they possess the appropriate attitudes, ethical understanding and legal responsibilities of a health professional together with a commitment to lifelong learning and continuing professional and personal development. Parameters which cannot easily be assessed by means of an examination. In pharmacy, as in dentistry, these subject areas are introduced and assessed during the undergraduate degree. For pharmacy, professionalism and a commitment to lifelong learning is further assessed by means of work-based assessment during the preregistration training year.

Overseas pharmacists (whether EEA or non-EEA nationals) with non-EEA qualifications and non-EEA nationals with EEA qualifications have to demonstrate that they satisfy the same graduate outcomes as UK Pharmacy degree holders by completing an Overseas Pharmacists Assessment programme (OSPAP). Following successful completion of the OSPAP, overseas pharmacists follow the same preregistration training programme and are required to achieve the same performance standards as UK pharmacy graduates.

Finally Overseas pharmacists and UK graduates must also pass the Society's registration examination before being eligible for registration with the Society.

Further comments

- The primary dental qualification recognised for the IQE examinations must also comply with the minimum training requirements set in the Dental Directives.
- The Society has no experience of holding examinations outside GB, but prior to the introduction of the OSPAP, external examinations were held for candidates at a School of Pharmacy. Confirming and verifying the identity of candidates presenting for the examinations was identified as a potential problem which could be exacerbated if examinations are held abroad.

- We understand that under the current Dentists' Act it is not possible to implement a preregistration year or extend the system of temporary registration, would the Dentists' Act however permit a course at Dental Schools which would lead to Part 1 and 2 examinations. Such a course would be helpful to candidates who may have completed their dental qualification some years ago and also useful as an introduction to dental practice in the UK setting.

If you wish to discuss any of the comments further, then please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Martha Pawluczyk', with a stylized flourish at the end.

Martha Pawluczyk
Overseas Registration Manager