

## **Temporary Registration Guidelines**

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## Version control log

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2.0	April 2016	Klara Rehorova	Added English Language requirements
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## 1. Definition of temporary registration

- 1.1. Temporary registration is available to any person holding a recognised overseas diploma.<sup>1</sup>
- 1.2. Temporary registration exists to allow overseas-qualified dentists to undertake a training programme at a UK university or in an NHS hospital, carry out research or undertake a programme of teaching at a UK NHS hospital or university.
- 1.3. Temporary registration **will not** be granted to allow the applicant to work in primary care or private hospitals or dental practices.
- 1.4. Temporary registration **is not** for the purposes of covering staff shortages or for providing service cover when existing full time members of staff are absent due to illness or are on leave.
- 1.5. Temporary registration **does not** lead to full registration or offer the option of being exempt from either taking the ORE or exempt from taking certain parts of the ORE in order to gain full registration.
- 1.6. An applicant does not have to apply for temporary registration to take the ORE or vice versa.
- 1.7. The applicant **must not** begin their temporary registration post until they have been granted temporary registration. Working in a post without the required registration is illegal practice.
- 1.8. The GDC does not assist in finding suitable posts for temporary registration nor can the GDC provide advice regarding visa and entry requirements to the UK. The GDC cannot accept responsibility if a temporary registrant cannot undertake a post, if they have arrived in the UK or accepted the post with the incorrect visa.
- 1.9. The GDC aims to list the following information on the GDC website once an applicant has been given temporary registration:
  - 1.9.1. the temporary registrant's full name
  - 1.9.2. their temporary registration number
  - 1.9.3. the name of the post
  - 1.9.4. the start and end dates of the post
  - 1.9.5. a list of hospitals/institutions they will be working in whilst in that post
- 1.10. Once registered, temporary registrants are subject to the **GDC's CPD rules**<sup>2</sup> in the same way other registered dentists are. It is therefore recommended that the temporary registrant keep a CPD record as set out in the rules. Please refer to the GDC Guidance on enhanced CPD and the requirements on our website - <https://www.gdc-uk.org/professionals/cpd/enhanced-cpd> - for further details.

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<sup>1</sup> Recognised overseas diploma – A diploma granted in a country overseas and recognised for the time being by the Council for the purposes of the Dentists Act 1984 (Amendment) Order 2005.

<sup>2</sup> The General Dental Council (Continuing Professional Development) (Dentists and Dental Care Professionals) Rules 2017, “the CPD rules”, came into effect for dental professionals, including temporary registrants, on 1 January 2018.

## 2. Posts suitable for temporary registration

### 2.1. Training posts

#### 2.1.1. Dental Senior House Officer post<sup>3</sup>

These posts are administered by the relevant postgraduate deaneries in UK and the applicant needs to obtain a **letter from the deanery** confirming that the SHO post being applied for is suitable for training.

#### 2.1.2. Tier 5 Medical Training Initiative Training post

These posts are administered by the National Advice Centre for Postgraduate Dental Education (NACPDE) and the applicant must have **confirmation from the NACPDE** that the training post is approved before applying for temporary registration with the GDC.

#### 2.1.3. Specialty Registrar post

These posts are **administered by the relevant postgraduate deanery and the applicant must obtain a letter from** them which must state the applicant's training number, that the post applied for is suitable for training and the dates when the training programme is due to begin and end.

#### 2.1.4. Army/Navy Personnel Exchange Programme

The applicant would need to obtain a letter from their supervising consultant who must state that that the applicant is participating in an approved exchange programme and also the start and end dates of this post.

### 2.2. Teaching, research and other temporary registration posts

2.2.1. If the applicant wishes to apply for a temporary registration post that is not listed or a post for research or teaching, they should contact the Registration Team for guidance on their application.

## 3. The responsibilities of the applicant when first applying for temporary registration

3.1. Before submitting an application, the applicant must ensure that their dental degree is recognised for the purposes of temporary registration. To do this, the applicant must contact UK NARIC<sup>4</sup> ([www.naric.org.uk](http://www.naric.org.uk)) on how to obtain eligibility for their qualification. If their qualification is accepted as comparable, UK NARIC will provide the applicant with a letter confirming approval which must be submitted to the GDC with the first application for temporary registration. The applicant is responsible for paying UK NARIC any charges incurred in having their qualification recognised. A letter from UK NARIC is not necessary, if the applicant has previously applied for the ORE and their qualification has been accepted by the Examinations Team.

3.2. The applicant will need to demonstrate they have clinical experience when applying for temporary registration. The applicant must show they have undertaken at least 1600 hours of clinical experience where they have personally treated patients in the dental chair. The number of hours

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<sup>3</sup> Dental Senior House Officer posts may also be described as Dental Foundation Year 2 training posts or Career Development Posts

<sup>4</sup> NARIC UK - National Academic Recognition Information Centre

of this clinical experience will either be hours spent undertaking appropriate investigations and administering dental treatment:

- 3.2.1. during their dental degree programme
- 3.2.2. during post-qualification experience; or
- 3.2.3. a combination of the two.

Hours spent time observing other dentists or assisting other dentists/dental students in undertaking diagnosis/treatment planning or provision of treatment cannot be included as part of the specified 1600 hours.

The applicant's previous employer or Dean of their dental school will need to sign the declaration in the application form to confirm these hours have been completed.

- 3.3. If the GDC is satisfied about your knowledge of English from your initial application for registration or restoration we will not request further evidence or information.
- 3.4. If we are **not** satisfied that you have produced sufficient evidence that you have the necessary knowledge of English, we will request further evidence and/or information before Temporary Registration can be granted.

The following is a list of evidence that the applicant can provide as part of their application for registration to demonstrate to the GDC that they have the necessary knowledge of English:

- I. A recent primary dental qualification that has been taught and examined in English
- II. A recent pass in a language test for registration with a regulatory authority in a country where the first and native language is English
- III. Recent experience of practising in a country where the first and native language is English
- IV. An International English Language Testing System (IELTS) certificate at the appropriate level

Please refer to our separate guidance document '**Evidence of English language competence: guidance for applicants**'<sup>5</sup> for guidance about the types of evidence we are likely to accept as demonstrating that a dental professional has the necessary knowledge of English.

#### **4. Documents required when applying for temporary registration**

##### **4.1. The GDC will be unable to issue temporary registration if the following documents are not submitted:**

- 4.1.1. A completed application form - a completed form will also be required when applying for temporary registration as well as renewal or restoration of temporary registration. The application form must have been completed within the last three months as the character and clinical references (for first applications) within it expire within three months of being dated.

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<sup>5</sup> GDC Guidance on English Language Controls (<https://www.gdc-uk.org/api/files/GDC%20Guidance%20on%20English%20Language%20Controls.pdf>)

- 4.1.2. A certified copy of a valid passport.
- 4.1.3. A certified copy of a change of name document (if applicable)
- 4.1.4. A certified copy of the applicant's primary dental degree.
- 4.1.5. An authorised English translation of the applicant's primary dental degree, ONLY if the original document is not issued in English.
- 4.1.6. A certificate of good standing, which must be issued by the regulating body from the country that the applicant last practised as a dentist. This document must be less than three months at the time of application and the original must be submitted (for first registration and restorations only).
- 4.1.7. An authorised English translation of the certificate of good standing, if the original document is not issued in English.
- 4.1.8. An evidence of English language competence. Please see document 'Evidence of English language competence: guidance for applicants' for further information.
- 4.1.9. If applying for temporary registration for the first time, the applicant will also need to submit their letter from UK NARIC confirming their qualification has been recognised.

#### **4.2. Guidelines for the certification of copies of original documents**

The GDC's guidelines for the certification of copies of original documents are as follows:

- 4.2.1. A photocopy of the original document, not of a fax or photocopy.
- 4.2.2. The person certifying the copy of the document should be a Notary Public, Commissioner of Oaths, Justice of the Peace, lawyer, solicitor or an authorised officer of an embassy or consulate.
- 4.2.3. The person certifying the copy must confirm in English writing that they have inspected the original document and that the copy of the document they are certifying is a 'true copy of the original document'.
- 4.2.4. The person certifying the copy must also write on the copy their full name, address and, if they do not have a stamp, their professional status. They must then sign the copy.
- 4.2.5. The person certifying the document cannot be the applicant themselves, a relative or their partner or spouse, regardless of their professional status.

#### **4.3. Guidelines for the translation of documents**

Any document not in English must be translated according to the GDC's standards:

- 4.3.1. The certified translation must be produced by a qualified translator; and
- 4.3.2. The translation must be bonded to the photocopy of the specific document; and
- 4.3.3. The translation must confirm in English writing that the translation is an exact translation of the copy attached; and
- 4.3.4. The translator must provide their full name and contact details.

4.3.5. The GDC will not accept a translation of a translation (e.g. a Polish document translated into German, then to English from German is not acceptable).

## **5. How the GDC operates temporary registration**

### **5.1. Temporary registration applications**

5.1.1. Temporary registration will be granted for a maximum of 1826 days in total.

5.1.2. Temporary registrants have a maximum period of seven years starting on the date on which their first temporary registration direction starts, in which they can use their allotted 1826 days. Once a temporary registrant has used their full entitlement of 1826 days, no further temporary registration directions will be issued for that temporary registrant. After a period of seven years starting on the day which a temporary registrant's first direction began, no further temporary registration directions will be given to that temporary registrant, regardless of how many days have been utilised.

5.1.3. Periods of temporary registration will be granted for:

- a minimum period of 180 days
- a maximum period of 365 days

Periods shorter than 180 days will only be granted if the post being applied for is a continuation of an existing post.

5.1.4. Temporary registration is given on the basis that an applicant has the requisite knowledge and skill for the efficient practice of dentistry in the post in question. It will ONLY be issued if the applicant has obtained a suitable training, teaching or research post.

5.1.5. The applicant is only permitted to work in a maximum of three hospitals in any one post.

5.1.6. Once an applicant has been registered, the Registration Team will email the applicant and the supervising consultant, informing them of the position, location(s) and dates of the direction granted. The temporary registrant can view and print the temporary registration certificate by logging into their eGDC account ([www.egdc-uk.org](http://www.egdc-uk.org)). It is the applicant's responsibility to make sure that these certificates are distributed to the appropriate people.

5.1.7. Payment for temporary registration will be taken once every 365 days and payment can be made only once during every calendar year. Payment in full must be made and there is no option to pay for a set number of days.

5.1.8. If the dates that a temporary registrant is employed change, the temporary registrant must inform the Registration Team in writing that they intend to end or have ended a post within 10 days of this situation happening. The temporary registrant will also need to obtain confirmation from the Human Resources department in writing of the new end date of their current post. The Registration Team will then amend the dates of this post and add the days not used back onto the total number of temporary registration days the applicant has remaining. Only the specified unused days will be returned to the

applicant, not any part of the fee. The GDC must receive notification regarding the change of date within the specified time to return the unused days back to the temporary registrant's record.

- 5.1.9. If the temporary registrant is due to be on maternity, paternity or parental leave during their current post, they must inform the GDC in writing as soon as possible stating the dates that they will not be working. In addition, confirmation will also be needed from the Human Resources department in writing confirming the dates of leave. The GDC will then add these unworked days back onto the temporary registrant's record.
- 5.1.10. Temporary registration days will not be given back to the temporary registrant for the reason of annual leave or study leave.
- 5.1.11. If a temporary registrant was not able to start or finish a post or was unable to work for a period of time due to illness whilst being in a temporary registration post, they must inform the Registration Team in writing, within 10 days of this happening, that they have been ill and unable to work. The temporary registrant must also obtain a letter from their designated supervising consultant stating how their illness affected their programme of training, teaching or research. If the GDC are satisfied with this information, the number of days not used by the temporary registrant will be added back onto the total number of temporary registration days the applicant has remaining.

## **5.2. Temporary registration renewal applications**

- 5.2.1. Every time a direction ends, the applicant must always complete a temporary registration renewal application before continuing to work. This is also applicable when the applicant wishes to continue working in an existing post. The applicant should not work until they have been granted temporary registration to work in that specific post.
- 5.2.2. The renewal application contains a declaration which states that whilst in their previous post, the temporary registrant has been neither involved in any incidents regarding performance or patient safety or any other disciplinary proceedings. This declaration will be in the temporary registration renewal form and will need to be signed by the applicant's previous supervising consultant who will also confirm that they have no issue with the applicant being granted further temporary registration. Temporary registration will only continue to be given on completion of a satisfactory progress report from their previous supervising consultant. This will need to be completed even if the temporary registrant is applying to continue working in an existing post.
- 5.2.3. All applications for first registration, renewal or restoration will also contain a self-character<sup>6</sup> and health<sup>7</sup> declaration. This declaration should be completed and signed by the applicant. Because dentists are exempt from the Rehabilitation of Offenders Act 1974, the applicant must tell us about any previous or pending prosecutions or convictions, including those considered "spent" under this Act. The applicant must also include any cautions they may have. The GDC will also need to know if the applicant has

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<sup>6</sup> GDC's Guidance for decision makers on the impact of criminal convictions and cautions  
<https://www.gdc-uk.org/api/files/Convictions%20and%20Cautions%20Guidance.pdf>

<sup>7</sup> GDC's Health self-certification guidance <https://www.gdc-uk.org/api/files/Health%20self-certification%20guidance.pdf>

been the subject of any proceedings in the past, or if any are being contemplated, by a regulatory or licensing body in the UK or any other country.

5.2.4. Temporary registrants are required to undertake at least 20 hours of CPD during each CPD year. A temporary registrant will be asked to declare their CPD statement upon completion of a year's (365 days) worth of direction from 1 January 2018 (when the CPD rules" came into effect). This will be required before the next direction can be granted.

### **5.3. Temporary registration restoration applications**

5.3.1. If an applicant does not have a temporary registration post for more than a year, then they must complete a temporary registration restoration form which contains another health and character reference.

5.3.2. If the applicant was practising as a dentist in another country during this time, the GDC will also require a certificate of good standing from the last regulating body they were registered with. This document should have been issued in the last three months at the time it is submitted to the GDC and should remain valid throughout the entire processing time.

5.3.3. The applicant will need to provide an evidence of English language competence. Please see document '**Evidence of English language competence: guidance for applicants**' for further information.

5.3.4. A temporary registrant restoring to the register will be asked to submit a completed CPD record along with the necessary documentary evidence and complete the CPD declaration in the application form.

The record must contain details of all CPD undertaken in the shorter of the following periods —

- Period between the start of their CPD cycle and date of their restoration application; or
- the five years preceding the date of their restoration application; or
- the period between the date of the first temporary registration direction and the date of their restoration application.

Further details are available on the Temporary Registration Restoration application, please contact the Assessments Team ([Assessments@gdc-uk.org](mailto:Assessments@gdc-uk.org)) to request the application form.

## **6. Fitness to practise procedures in regard to temporary registration**

### **6.1. Illegal practice**

6.1.1. A temporary registrant is classed as such when they are registered by the GDC in a specific post, at a specific location/s for a specific period of time.

- 6.1.2. It is the applicant's responsibility together with the relevant Human Resources Department to ensure that they have the appropriate temporary registration before they start work in any post. Working in a post without the required registration is illegal practice.
- 6.1.3. If an applicant finds themselves working without temporary registration, they must stop and immediately inform the GDC. If they wish to continue working in that post, they must also submit a completed application form as well as a letter from themselves and the Human Resources Department or supervising consultant explaining how they came to work without temporary registration. The GDC will then assess this information before deciding what action should be taken. If the GDC finds that the supervising consultant did not take adequate measures to ensure that the applicant was registered, the GDC may also place the supervising consultant into fitness to practice proceedings.

## **6.2. Conduct issues whilst under temporary registration**

- 6.2.1. As specified in the GDC's Standards Guidance - Principles of Dental Team Working, it is the responsibility of any dental professional to report a colleague if they believe patients may be at risk due to their health, behaviour or professional performance.
- 6.2.2. On receiving a complaint regarding a temporary registrant, the GDC will follow the same procedure as those for fully registered DCPs and dentists.
- 6.2.3. To enable the GDC to investigate a complaint about a temporary registrant, the temporary registrant must be on the register. The GDC is primarily concerned with issues of public protection and therefore it may be necessary to retain the name of the temporary registrant on the register until all investigations into the complaint/s are resolved. This would be the case, even if the temporary registrant was coming or had come to the end of their entire 5-year period of temporary registration. In this scenario, the GDC will inform the temporary registrant that they are not able to work or apply for any further temporary registration during this time of investigation.

## **7. Responsibilities of those involved in temporary registration**

### **7.1. Temporary registrant**

When working under temporary registration, temporary registrants are responsible for ensuring that they:

- 7.1.1. Only begin or continue in a post if they have the appropriate temporary registration to do so.
- 7.1.2. Do not undertake duties that are outside the remit of their training, teaching, or research post.
- 7.1.3. Do not undertake duties that they have not received prior training for and they feel are outside of their capability
- 7.1.4. Are not solely responsible for the supervision of undergraduate students and aspects of student training.

- 7.1.5. Do not undertake any duties as part of their post, unless there is a fully registered dentist on the premises, to assist in cases of patient difficulty or emergency.
- 7.1.6. Inform the GDC of any conduct, performance or health issues that may or are affecting their fitness to practice.
- 7.1.7. Undertake at least 20 hours of CPD during each CPD year, ensuring that the all the other requirements as outlined in the GDC Guidance on enhanced CPD are met.

## **7.2. Designated supervising consultant**

The designated supervising consultant (i.e. the consultant who signs the application form) of a temporary registrant is responsible for ensuring that:

- 7.2.1. The temporary registrant does not begin or continue in a post if they do not have the appropriate temporary registration to do so.
- 7.2.2. They themselves have full registration with the GDC and ensure they maintain their registration throughout the duration of the temporary registrant's post. If (for whatever reason) their name is removed from the register, they must make arrangements for a suitable replacement otherwise the temporary registrant will not be able to continue in that post.
- 7.2.3. The temporary registrant remains on the programme of training, teaching or research that they have been given temporary registration for, and that the temporary registrant is not being used as cover for staff shortages.
- 7.2.4. Before commencing a period of supervision for a training post, they have a training plan in place which must include the following:
  - timetable for activity - set times for clinical tasks, consultations, studying time;
  - details of who will be supervising the temporary registrant at each stage;
  - details of assessment procedures and the opportunity for the temporary registrant to provide feedback;
  - if it's an SHO DF1, DF2, Career Development Post or Tier 5 MTI training post, making sure either the postgraduate deanery or NACPDE have given their approval.

This training plan should be in a contract form and be signed by a HR representative, the designated supervising consultant and the Temporary registrant so that it is clearly understood by all parties what exactly is expected of them.

- 7.2.5. The temporary registrant is not solely responsible for the supervision of undergraduate students and aspects of student training.
- 7.2.6. They inform the GDC of any conduct, performance or health issues, which may or are affecting the temporary registrant's fitness to practice. In addition, have clear disciplinary procedures in place internally to deal with conduct issues.

7.2.7. The temporary registrant is not allowed to undertake any duties as part of their post under temporary registration, unless there is a fully registered dentist on the premises to assist in cases of patient difficulty or emergency.

### **7.3. Human resources department**

The GDC has no jurisdiction over Human Resource Departments in hospitals and universities. However, in terms of protecting the patients and the temporary registrant themselves, the GDC recommend that Human Resource Departments operate under the following guidelines when dealing with temporary registrants:

- 7.3.1. Take responsibility for ensuring the temporary registrant has the appropriate temporary registration to begin or continue with the post.
- 7.3.2. Ensure that the temporary registrant's supervising consultant has full GDC registration throughout the entire time of the temporary registration post. If the consultant's registration lapses, a suitable replacement must be found and the GDC must be informed in writing of this change as soon as possible. If a replacement cannot be found, the temporary registrant must cease working in that post immediately.
- 7.3.3. Agree to and sign a training plan as specified in point 7.2.4.
- 7.3.4. Do not use temporary registrants as cover for staff shortages.
- 7.3.5. Inform the GDC if a temporary registrant's performance, conduct or health is affecting their fitness to practice as well as ensuring internal disciplinary procedures are robust enough to deal with such scenarios.
- 7.3.6. Inform the GDC if they receive information from previous employers regarding conduct, performance or health that would affect their decision when it came to employing a temporary registrant.

### **7.4. Postgraduate Deaneries**

The Postgraduate Deaneries are responsible for the creation, assessment and quality assurance of all Dental SHO, DF1, DF2, Career Development and specialty training posts in the UK. The GDC will not issue temporary registration unless a letter from the relevant postgraduate deanery has been received confirming that particular SHO or specialty training post is suitable for training.

### **7.5. National Advice Centre for Postgraduate Education (NACPDE)**

The NACPDE is responsible for the sponsorship of all Tier 5 training posts in the UK. Therefore, any applicant wishing to undertake a Tier 5 training post must liaise with the NACPDE before approaching the GDC. The GDC is unable to issue temporary registration for any Tier 5 training post unless a letter of confirmation is received by them from the NACPDE.