

## **BMA Professional Fees Committee guidance on the completion of health reference forms for prospective registrants with the General Dental Council**

**November 2006**

The General Dental Council (GDC) has introduced a requirement that states all prospective registrants for clinical practice must have a health reference form completed by a doctor, or in some circumstances a supervising dentist. All dental professionals applying for registration or restoration with the GDC must provide certain information about their health. This applies to dentists as well as dental care professionals (DCPs) including dental hygienists, dental therapists, dental nurses, dental technicians, clinical dental technicians and orthodontic therapists

The BMA has significant concerns about the current GDC guidance notes issued for the completion of health reference forms and the wording on the actual form to be completed by the doctor. Representatives from the Association have now met the GDC on a number of occasions to highlight these concerns and outline the difficulties that have arisen over recent months. At the meeting the GDC confirmed that they are reviewing the process and would continue a constructive dialogue with the Association on improvements that could be made to the current procedures.

The Association has received legal advice on what constitutes 'treatment' under the GMS Contracts Regulations, which applies equally to PMS and APMS arrangements, and whether it would include the completion of health reference forms for prospective registrants with the GDC. The advice given to the BMA Professional Fees Committee has confirmed that investigations arising from the completion of health reference forms, such as chest x-rays and tests to verify freedom from infection do constitute treatment. Under the GMS Contracts Regulations, the PMS Agreements regulations and the APMS Directions, Regulation 24, no fee can be charged to a registered patient for this work. However a fee can be charged for completion of the actual health reference form.

The BMA considers that GPs should normally only provide factual reports on patient's and that procedures that require investigation (such as freedom from infection) should not normally be carried out by a general practitioner. If an opinion is required then this should be obtained from an occupational health physician with the appropriate expertise.

If GPs believe that that they are able to complete the report using factual information then the BMA suggested rate for a report on a pro forma (with no examination) is £73.50. This fee is included in BMA fees guidance schedule 11, section A2 and only applies if the services are provided by the patient's own GP or other attending doctor. Under the Competition Act 1998 the BMA cannot suggest a fee if the service is not provided by a GP to their own patient.

There have been anecdotal reports of suggestions that complaints should be made to the GMC where a GP feels unable to issue a report; the GDC have made it clear to the BMA that this is not, nor ever has been their view. This is also the view of the Association as one of the principles underlining registration with the GMC is that doctors must work within their level of competence. The GMC have acknowledged that the completion of health reference forms does not form part of a GPs terms and conditions and therefore GPs are not obliged to undertake the work.

Medical practitioners are advised to retain a copy of any health reference forms in the event of any future enquiries regarding the information provided.