



<b>Policy</b>	Raising Concerns Policy
<b>Effective Date</b>	24 <sup>th</sup> June 2021
<b>Date Last Reviewed</b>	March 2025
<b>Scheduled Review Date</b>	March 2027
<b>Supersedes</b>	-
<b>Owned by</b>	NEBDN Executive
<b>Monitored by</b>	Governance Committee
<b>Approved by</b>	NEBDN ESC Committee on 18 <sup>th</sup> March 2025 on behalf of the Board of Trustees

### Purpose

The purpose of this policy is to ensure that any material information or issues arising with NEBDN Providers or the dental practices where Learners are employed, or a Learner, are appropriately brought to the attention of the General Dental Council (GDC).

This policy also ensures that any appropriate matters that involve registered dental professionals and or future dental registrations are shared with the GDC.

### Using the correct policy

Examples below determine the nature of the matter raised to check it is being addressed under the correct Policy and process. This list is not exhaustive. Further guidance can be provided by NEBDN.

<b>Matter</b>	<b>Policy or process</b>
Learner complaint. e.g., about Provider support and preparation for the Diploma or the fees charged by the Provider	<b>NEBDN Complaints policy</b>  NB – Only after Provider complaint policy has been used and exhausted
Complaint about conduct by a member of NEBDN staff or Associate	<b>NEBDN Complaints policy</b>
Concerns that an approved dental training programme is failing to meet the GDC Standards for Education	<b>Local Provider Complaints Policy</b> Learners can escalate the matter under the NEBDN complaints policy only once the local complaints process is exhausted
Concerns about meeting GDC standards in relation to NEBDN Diploma qualification content or assessment	<b>NEBDN Complaints policy</b>
Learner/Provider wants to appeal/challenge an assessment result to gain a pass in an exam. Challenging a sanction or Reasonable Adjustment decision.	<b>NEBDN Appeals policy</b>
Provider staff member has an employment concern or issue between their employer and themselves, i.e., Human Resource related.	<b>Provider Grievance and or Disciplinary policy</b> <i>unless genuine good faith disclosure to NEBDN relating to whistleblowing or raising a concern</i>



<p>Any stakeholder is concerned that an <i>organisation</i> (NEBDN or another) is carrying out a criminal offence, endangering the health and safety of an individual or deliberate concealment of this.</p>	<p><b>NEBDN/Provider Whistleblowing policy.</b></p> <p>Individuals may have legal protection under Public Interest Disclosure Act 1998 (PIDA) regardless of policies</p> <p>May involve reporting to GDC under Raising Concerns if for an individual dental professional</p>
<p>Reporting alleged cases of malpractice/maladministration such as academic misconduct and NEBDN's responsibilities in dealing with such cases.</p>	<p><b>NEBDN Malpractice and Maladministration policy</b></p>
<p>Other issue of an <i>individual</i> within the dental profession falling outside of Complaints, Whistleblowing, or other policies and issue may relate to <i>any</i> person detecting:</p> <p>Academic or professional malpractice</p> <ul style="list-style-type: none"> <li>· Financial malpractice, impropriety, or fraud, including financial reporting</li> <li>· Corruption, bribery, or blackmail</li> <li>· Other alleged criminal activity</li> <li>· Undeclared conflicts of interest</li> <li>· Unethical behaviour, inappropriate conduct and/or breach of professional or regulatory guidelines</li> <li>· Acting outside procedural authority</li> <li>· A miscarriage of justice</li> <li>· Failure to comply with a legal or regulatory obligation</li> </ul> <p>Patient safety or compromised patient care</p> <ul style="list-style-type: none"> <li>· Patient mistreatment, abuse or infringement of patient dignity</li> <li>· Unethical care or care which breaches professional guidance</li> <li>· Inappropriate prescribing</li> <li>· Inappropriate patient treatment beyond the Scope of Practice</li> <li>· Inappropriate or fraudulent completion of clinical documentation</li> <li>· Deliberate attempts to conceal any of the above</li> </ul>	<p><b>NEBDN Raising concerns policy</b></p> <p>Serious concerns about the ability, health or behaviour of a dental professional that suggest the professional could cause significant harm to patients, colleagues themselves or the general public.</p>

This list is not exhaustive and the need to raise concerns to the GDC is determined by the nature of the matter.



### Scope

This process allows for any information, complaints, appeals, issues or concerns ('matters') that NEBDN becomes aware of via Patients, Learners, Providers, Witnesses, Associate Examiners, Learner employers or any NEBDN staff to be considered for sharing with the General Dental Council

*The General Dental Council (GDC) can investigate serious concerns about the ability, health or behaviour of a dental professional that suggest the professional could cause significant harm to patients, colleagues or the general public, or undermine public confidence in the dental profession. Examples include patient safety issues, fraud, discrimination and any serious criminal offences or convictions.* Taken from: [GDC website guidance on Raising Concerns](#)

### Procedure

Although NEBDN recognises that it does not always hold the primary responsibility to report concerns there is an obligation to protect Dental Care Professionals (DCPs), patients and the wider reputation of the dental profession. Ensuring that an appropriate and necessary report has been made protects NEBDN, the dental profession and the interests of any registered Dentist or DCP working for NEBDN.

If the matter falls under a potential Raising Concern NEBDN will take further steps to ensure that the relevant review and disclosure has been made to the GDC where appropriate.

1. Matter is shared with or identified by NEBDN.
2. Matter is investigated by the QA team and considered against the GDC's 'Standards for the Dental team' and in conjunction with any other 'Raising Concerns' guidance from the GDC.
3. The matter is reviewed by the Head of Regulation. If the matter is considered to breach the GDC Standards for the dental team, a check is made to determine if the matter has already been reported to the police or requires reporting. If required the matter will be reported to the Police, GDC and other regulators as needed. Written confirmation will be kept confirming that this has been done as part of a confidential incident report.
4. If required, the GDC will be notified by the Chief Operating Officer (COO) under Raising Concerns by an appropriate method.
5. NEBDN will cooperate and follow any further instructions or requests made by the GDC where these fall within the scope of NEBDN and applicable legal frameworks. NEBDN may refer the GDC to a more appropriate contact, such as the individual raising the concern or the Provider where appropriate.
6. The matter and outcomes will be recorded in the incident log and anonymised before appropriately sharing internally with the relevant Committee(s) and Board of Trustees as required.
7. NEBDN expects that any concerns will be raised without malice and in good faith based on the values of trust and accountability.



8. NEBDN will treat all disclosures confidentially and in a sensitive manner and consider all reports carefully and confidentially and ensure that individuals raising genuine concerns or contributing to an investigation will not be subject to harassment or victimisation.
9. Decisions made about the behaviour or health of: Learners, Provider staff, DCPs or other NEBDN staff registered with the GDC will be considered on a case-by-case basis. Reporting to the GDC will be based on whether the behaviour calls into question either the student's ability to continue with the course or their fitness to practice as a dental professional after qualifying.

### **Responsibilities**

The CEO and Chair of the Board hold ultimate accountability and responsibility for ensuring that any matter is appropriately reported to the GDC, any other regulator and or the police, if considered appropriate.

The Chief Operating Officer (or SMT alternative) is responsible for making any disclosures deemed appropriate to the GDC and or other regulators required.

### **Reference Materials**

NEBDN Grievance Policy  
NEBDN Complaints Policy  
NEBDN Appeals Policy  
NEBDN Whistle Blowing Policy  
NEBDN Malpractice and Maladministration Policy  
NEBDN Incidents and Issue Management Policy  
NEBDN Bribery and Corruption Policy  
Public Interest Disclosure Act (PIDA) 1998  
GDC – 'Standards for the Dental Team' - updated on (28.06.2019)  
GDC - 'Standards for Education' - (May 2015 version)  
GDC Raising Concerns – website guidance (25.05.2021)  
Ofqual General Conditions of Recognition

### **Questions**

If employees are in any doubt as to their responsibilities or if they have any questions about this policy, in the first instance, they should speak to their line manager, or a member of the Senior Management Team.

NEBDN will review the policy every two years and revise it as and when necessary, in response to external feedback, trends from internal monitoring arrangements, changes in practices, actions from the regulatory authorities or external agencies or changes in legislation.