



NHSR28

INVESTOR IN PEOPLE



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Sian Wilkins  
Committee Clerk  
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Dear Ms Wilkins

### **NHS REDRESS WALES MEASURE - PROPOSALS**

Thank you for the invitation to respond on behalf of the dental profession to the proposals. I would apologise for our late response owing to staff leave.

There is no doubt that complaints and litigation are stressful, time consuming and sometimes costly to administer but we are uncertain as to how the proposals as presented will effectively change this.

NHS bodies, to which these proposals apply initially could include some primary care contractor dental practices that opted to become NHS bodies following the introduction of the new contract. There is also the reference to the regulations 'being wide enough to apply NHS redress arrangements to primary care' so could embrace all dental practices.

In brief, our main concerns are:

- Despite the drawbacks of the schemes currently in place, they do work, be it slowly. The proposals may result in an increase in complainants seeking redress simply because the scheme is in place.
- That this scheme does not close off the risks of multiple jeopardy to the practitioner nor does there appear to be a mechanism allowing practitioners to appeal a decision taken against them.
- Trusts may seek to use this scheme as an easy way of placating a complainant. This may then be placed against an employee's work record.
- Dentists frequently refer patients to colleagues for parts of a course of treatment. There may be confusion over what part of the treatment is the root cause of the complaint, or if it was provided under NHS or private contract.

- Dentists are required to have indemnity insurance whilst working in practice. Will indemnity organisations be required to underwrite this scheme?
- There must good clinical governance processes in place. A potentially 'cheap' solution to complaints etc must not be used as an excuse for failing to have these in place.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Stuart Geddes', with a long horizontal flourish extending to the right.

Stuart Geddes  
Director.