



Dear Colleague

Notification of Changes to:

- **Prior Approval (General Dentistry)**
- **Mandatory Training (Provisional Listing)**

Summary

1. This circular advises of changes to Regulations¹ to allow Scottish Ministers to put in place reform of prior approval for general dentistry.
2. The amendments in this respect will come into force on 1 November 2026 (therefore this circular should be read by dentists and dental teams as an early heads up on the forthcoming changes to prior approval later in the year).
3. Changes have also been made to allow provisional listing pending completion of mandatory training.
4. The amendments in this respect came into force on 31 January 2026.
5. A copy of the Amendment Regulations can be found online at:
[https://www.legislation.gov.uk/ssi/2025/380/content/s/made.](https://www.legislation.gov.uk/ssi/2025/380/content/s/made)²

11 February 2026

Addresses

For action

Chief Executives, NHS Boards

Directors of Dentistry

For information

Chief Executive,
NHS National Services Scotland

Chief Executive,
NHS Education for Scotland

Director, Practitioner Services

Dentists/Dental Bodies Corporate

Policy Enquiries to:

Dentistry and Optometry Division
1st Floor East Rear
St Andrew's House
EDINBURGH
EH1 3DG

NHSdentistry@gov.scot

¹ The National Health Service (General Dental Services) (Scotland) Regulations 2010, [The National Health Service \(General Dental Services\) \(Scotland\) Regulations 2010](https://www.legislation.gov.uk/ssi/2025/380/content/s/made)

² While this circular provides an overview of the impact of the changes to the regulations, it is not intended to be a substitute for a dentist or dental body corporate making themselves familiar with the full content of the Regulations.

Fee and Payment Reform

6. From 1 November 2023, the Scottish Government introduced significant reforms to the NHS dental payment system, moving to a high-trust, low bureaucracy model, which focuses on modernised service provision through clinical discretion and patient-centred care based on need.
7. Within this we made substantial improvements to the fee structure, designed to incentivise dentists to provide more NHS care, and in turn improve patient access to services. Payment reform was intended as a first step in ensuring sustainability of NHS dental services, therefore further changes to the current system and processes are required.
8. We have consulted the British Dental Association Scottish Dental Practice Committee on the amendments to the Regulations and we will continue to engage with them during the implementation phase.

Prior Approval (General Dentistry)

9. Dentists and dental teams will be aware that prior approval is a critical requirement of the clinical governance of NHS dentistry. Currently, the system includes a requirement on dentists to submit for prior approval any course of treatment where the cost will exceed £660.
10. Following the introduction of dental payment reform, there has been an increased volume of low clinical risk treatment plans being submitted for prior approval as they exceed the financial limit, creating a higher workload for NSS clinical advisers. It also makes it more laborious for dentists to undertake treatment plans and can result in delays to necessary treatment for patients due to a financial limit rather than for any clinical considerations.
11. Therefore, from 1 November 2026, we will be removing the current financial threshold for general dentistry, as set out in Schedule 4 of the Regulations, and will replace it with a new prior approval system that focuses on clinical considerations. Other methods of prior approval, such as the requirement for prior approval based on a practitioner's patterns of treatment will still remain in place.
12. Please note the changes to prior approval do not apply to orthodontic services, and orthodontic courses of treatment will continue to be subject to the current financial threshold of £660.

New Prior Approval System

13. The new system will require prior approval for courses of treatment which contain those treatments, or combinations of treatment, which are considered to be higher clinical risk. We have also taken the opportunity to explore the clinical risk that may exist where a clinician has limited experience of working within the Scottish primary care system. With this purpose, we have introduced a tiered system for individual clinicians, which will be applied to the basic clinical risk model. The treatment items and combination of treatments will be the same for both tiers, however, the threshold limits may be different for each tier.

14. All clinicians will fall into one of two tiers as follows:

- Tier 1 – this is the new base model of prior approval. It will comprise of the vast majority of dentists, who are expected to be familiar with NHS GDS care, and who do not fall into the criteria described under tier 2.
- Tier 2 – this is for dentists who have limited experience of Scottish NHS GDS care and will include dentists who are:
 - undertaking VT;
 - provisionally listed pending completion of mandatory training; and
 - within 12 months of successful completion of mandatory training or vocational training.

Treatment Items Requiring Prior Approval

15. Table A summarises the treatment items included in the new prior approval model for general dentistry and the thresholds which apply for Tier 1 and Tier 2. Where a planned course of treatment contains any item listed in the table and the number of treatments planned is, or exceeds, the threshold number for the relevant tier then prior approval will be required.

Table A

Treatment Item and Description	Item Code	Tier 1 Threshold	Tier 2 Threshold
1-(d) Intraoral Radiograph	A004	15	15
3-(e) Posterior Composite Supplement	C005	8	4
3-(e) Posterior Composite Supplement - supplement for 2 fillings on one tooth	C015	3	2
3-(f) Endodontic Treatment (incisor/canine/lower premolar)	C006	4	3
3-(g) Endodontic Treatment (upper premolar)	C007	3	3
3-(h) Endodontic Treatment (molar)	C008	3	3
3-(j) Re-Root Canal Treatment Supplement	C010	2	2
3-(k) Internal Bleaching	C011	2	2
4-(b) Crown Placement	D002	4	3
4-(c) Post and/or Core retention for crowns and bridges	D005	4	3
4-(d) Inlay/Onlay Placement	D006	4	3
4-(e) Replacement Veneer	D009	3	2
4-(f) Conventional Bridge (per unit)	D012	3	2
4-(g) Resin Retained Bridge (per unit)	D015	4	2
5-(b) Surgical Extraction	E002	3	2
5-(c) Advanced Surgical Extraction	E003	3	1
5-(d) Advanced Surgical Procedures	E004	2	1
7-(g) Acid Etched Splint (per union)	G013	3	1

7-(h) Laboratory Made Soft Splint / Fluoride Tray / Trauma Retainer / External Bleaching Tray (per appliance)	G014	2	2
7-(i) Laboratory Made Hard Splint (per appliance)	G015	2	2

Combinations of Treatment Items Requiring Prior Approval

16. Some advanced treatments may not individually reach the Prior Approval threshold, however, when they are prescribed in combination with other advanced treatment items, it may indicate a higher risk of disease or higher clinical risk. Therefore, we have grouped certain items, specifically endodontic treatments and extracoronal restorations, and created a combination threshold for them. Table B summarises the endodontic items and Table C the extracoronal restorations.

Table B

Endodontic Treatment Combination Items	Item Code	Tier 1	Tier 2
3-(f) Endodontic Treatment (incisor/canine/lower premolar)	C006	Combination of 4 or more	Combination of 3 or more
3-(g) Endodontic Treatment (upper premolar)	C007		
3-(h) Endodontic Treatment (molar)	C008		

Table C

Extracoronal Restoration Combination Items	Item Code	Tier 1	Tier 2
4-(b) Crown Placement	D002	Combination of 6 (including units) or more	Combination of 4 (including units) or more
4-(c) Post and/or Core retention for crowns and bridges	D005		
4-(d) Inlay/Onlay Placement	D006		
4-(e) Replacement Veneer	D009		
4-(f) Conventional Bridge (per unit)	D012		
4-(g) Resin Retained Bridge (per unit)	D015		

17. Some example treatment plans have been provided to illustrate the new system and the differences between Tier 1 and Tier 2:

Example 1 – a planned course of treatment includes item 3-(f) (C006) x 2 and 3-(h) (C008) x 1.

- Tier 1 dentist – no prior approval required
- Tier 2 dentist – prior approval required – no individual item reaches the threshold but the combination of 3 endodontic treatment items reaches the combination threshold.

Example 2 – a planned course of treatment includes item 3-(h) (C008) x 1, 5-(c) (E003) x 2, and 4-(g) (D015) x 3 units.

- Tier 1 dentist – no prior approval required

- Tier 2 dentist – prior approval required as 5-(c) (E003) and 4-(g) (D015) have reached the individual item thresholds.

Example 3 – a planned course of treatment includes 4-(b) (D002) x 3, 4-(c) (D005) x 2, 4-(e) (D009) x 1, and 5-(d) (E004) x 1.

- Tier 1 dentist – prior approval required – no individual item reaches the threshold but the combination of 6 extracoronal restorations reaches the combination threshold.
- Tier 2 dentist – prior approval required as 4-(b) (D002) and 5-(d) (E004) have reached the individual item thresholds and the combination of 4 extracoronal restorations exceeds the combination threshold.

18. The changes to the Regulations also allow the details of the prior approval system to be set out in the Statement of Dental Remuneration (SDR). This will enable the treatment items and the thresholds to be updated more easily in future if clinical considerations evolve.
19. Ministers hope that by making these changes that the provision of NHS dental services will be less onerous for dental teams. By removing the need to submit for prior approval for lower risk treatments whilst still ensuring there is appropriate governance for higher risk treatment plans. Ministers view this change as the next step in reform programme for NHS dental services, building on the successful fee reform changes in November 2023.

Next Steps

20. Practitioner Services will be leading on the implementation of the new prior approval arrangements. Further communications will follow as we move toward the implementation date and educational materials will be available through Turas in advance of the new system coming into effect.

Mandatory Training (Provisional Listing)

21. Changes have also been made to the Regulations to enable GDC-registered dentists to list on a provisional basis pending the successful completion of mandatory training.
22. At present dentists who wish to provide NHS dental services in Scotland for the first time, or after a break of 12 months or more (subject to some exceptions), must complete a course of mandatory training and undertake a test of knowledge before they can join a Board's dental list.
23. The mandatory training courses are offered four times per year, using the preferred blended learning model of online and face to face session, meaning a dentist may have to wait for several months before they can attend the training. This can result in dentists opting not to work in Scotland at all, or choosing to only provide private dental services, in some cases exacerbating recruitment issues for dental practices.
24. Ministers have listened to these concerns, resulting in changes to the Regulations to enable dentists to join a dental list, from 31 January 2026, on a provisional basis for a period of six months whilst they wait to undertake mandatory training and the test of knowledge.

25. These measures are viewed as a concession and they have been carefully calibrated to reflect the need to ensure appropriate clinical governance and mandatory training with the need to improve the opportunities for practices to timeously recruit dentists, particularly in rural and island locations. We will therefore be keeping these particular arrangements under review and will be liaising with Boards on the fitness of these measures.

Applying to List Provisionally

26. In order for a dentist to be provisionally listed they must:

- be registered with the General Dental Council (GDC) as a dentist;
- have undertaken basic life support (BLS) training within the UK from an in-person provider;
- have registered with NHS Education for Scotland (NES) to undertake the next available mandatory training course;
- not apply to list in more than one Board area;
- not have requested to list as a domiciliary care dentist; and
- not practice as a single handed practitioner whilst listed provisionally.

27. A dentist should only be listed provisionally once, unless there are exceptional circumstances. Circumstances which may allow a dentist to be listed provisionally for a second time includes:

- the dentist having been on maternity, paternity, adoptive leave, shared parental leave, or sick leave during the original six month period which prevented them from attending mandatory training;
- the dentist having been removed from the list during the original six month period as a result of a decision of the tribunal but the decision is later overturned; or
- the NHS Board is satisfied that there are exceptional circumstances not otherwise specified in the regulations which justify the dentist being allowed to list for a second time.

28. A dentist who wishes to list provisionally should apply to the NHS Board in whose area they wish to provide general dental services through the normal process. They should complete the GP21 form appropriate to the part of the dental list they wish to join – this would be the same part of the list that they would be eligible to join if they had completed mandatory training prior to applying to list.

29. The GP21 forms have been updated to include additional sections to complete relevant to listing provisionally and are available on the Scottish Dental website at: <https://www.scottishdental.nhs.scot/dental-team/forms/>. Applicants should complete all the general sections of the form as well as those specifically relating to provisional listing. As part of that application they should indicate that they wish to list provisionally and provide evidence of BLS training, and a copy of their registration email from NES showing that they are registered for the next available mandatory training course.

Refusing an application to list provisionally

30. In addition to the grounds for refusal set out in regulation 7 that are applicable to all applications to list, NHS Boards may also refuse an application to list provisionally if:

- the dentist was previously listed provisionally and does not meet any of the exceptions set out in regulation 4B(2)³ to allow them to be listed for a second time;
- the dentist has been removed from the list because they have not successfully completed mandatory training;
- the dentist has requested to be designated as a domiciliary care dentist; or
- the dentist is intending to practice as a single handed practitioner.

31. Where an application is refused because the dentist has requested to be designated as a domiciliary care dentist or was intending to be a single handed practitioner, they would not be prevented from re-applying as long as these circumstances have changed.

Successful completion of MT

32. Where a dentist has successfully completed mandatory training and the test of knowledge they must notify the NHS Board within 7 working days of receiving their result.

33. Once notified, the NHS Board should remove the dentists' provisional status and the dentist will not have to re-apply to be fully listed. The dentist may then apply to list in more than one board area or to be a domiciliary care dentist if they wish, subject to meeting the usual requirements.

Unsuccessful completion of MT

34. Where a dentist does not successfully complete mandatory training and the test of knowledge they must notify the NHS Board within 2 working days of receiving their result. Once notified, the NHS Board should remove the dentist from the list with immediate effect. Boards are expected to monitor when mandatory training should be completed and ensure they follow up if not notified of the outcome.

35. Where a dentist who is listed provisionally becomes aware that they will be unable to attend the mandatory training course that they are registered for, they should notify the Board as soon as possible and should be removed from the dental list (unless there are exceptional circumstances as per paragraph 27).

36. A dentist who does not successfully complete mandatory training and is removed from the list, will not be allowed to re-apply to list in any NHS Board area until they have successfully completed mandatory training and the test of knowledge, subject to the exceptions outlined at paragraph 26.

Provisional listing and allowances

37. Provisionally listed dentists will be able to claim allowances listed in the SDR as long as they meet the specific eligibility criteria.

38. Time spent provisionally listed will also be allowed to count towards any allowances which require the dentist to have been on a dental list for a specific period of time.

³ <https://www.legislation.gov.uk/ssi/2025/380/contents/made>

Provisional listing and terms of service

39. Dentists who are listed provisionally will still be required to abide by the terms of service as set out in Schedule 1 of the Regulations. However, they will not be required to complete any QI activity whilst they are provisionally listed. Once they have passed mandatory training they are required to participate in the QI cycle in the normal way.

Actions

NHS Boards

40. NHS Boards are asked to issue this PCA to all dentists and dental bodies corporate on their dental list.

41. NHS Boards should welcome the opportunity for dentists looking to list on a provisional basis to be “on boarded” in advance of the completion of training, and begin to contribute effectively to the care of patients. The on boarding in advance allows seamless transition to the full list, thus there should be minimal impact on NHS Board resources in completing the limited additional processes for a dentist to segue on to the relevant part of the dental list and sign off the provisional listing status.

42. NHS Boards will wish to ensure that provisionally listed dentists enjoy and benefit from the same support and relationship building during their provisional listing period as provided to existing entrants, or entrants joining through the routine process e.g. DPA supportive visits and introduction to any local arrangements (excluding direct participation in Out of Hours services). This also extends to any mentoring, monitoring or reporting required should any listed dentists have conditions on their professional registration.

43. NHS Boards are asked to ensure appropriate staff are familiar with the new arrangements for provisional listing, as they came **into force on 31 January 2026**. Specifically, NHS Boards should ensure processes are in place to support the following:

- The criteria for provisional listing, ensuring that prospective applications to list on a provisional basis satisfy the Regulations (paragraphs 25 and 27 refer);
- The exceptions for some to apply to provisionally list more than once, and the discretion afforded NHS Boards in these situations (paragraph 26 refers);
- The grounds available to NHS Boards to refuse an application to list provisionally (paragraphs 29 and 30 refer);
- Where a dentist who is provisionally listed successfully completes mandatory training they automatically qualify for full listing status (paragraphs 31 and 32 refer);
- Where a dentist who is provisionally listed is unsuccessful in completing mandatory training or fails to attend the relevant training, then they must be removed from the dental list (paragraphs 33 and 34 refer);
- Where a dentist who is provisionally listed and is removed from the dental list, they are not able to re-apply on a provisional basis, unless certain conditions are met (paragraph 35).

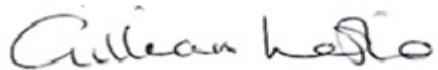
NHS Education for Scotland (NES)

44. Officials have been liaising with NES throughout the development of provisional listing arrangements. NES are required to ensure that satisfactory arrangements are in place to support the process of provisional listing, specifically the provision where appropriate to the dentist of evidence of registration on the next available mandatory training course (paragraph 29 refers).

National Services Scotland (NSS)

45. NSS are asked to note the arrangements for provisional listing at paragraphs 36 and 37.

Yours sincerely



Gillian Leslie
Chief Dental Officer