

Dental charging and Interpreters provision in the Enfield Area.

Members of the public and advocates have told us that getting a dentist to book a BSL/ interpreter for an appointment is impossible, with some patients being outright refused an interpreter. The refusal or reluctance to book spoken language/BSL interpreters seems to stem from the assumption that being reimbursed by NHS England took a very long time.

We contacted NHS England to find out why dentists were so averse to book interpreting services, especially as it would help patients understand their treatment; there is also patient consent to treatment to consider. So asked what the process was for dentists to be reimbursed for booking a BSL/spoken language interpreter.

We were informed that:

- Booking an interpreter is the responsibility of the dentist and not NHS England; this is not a new method or process.
- The process is that the Practice orders, pays for their interpreters, and then sends NHS England the invoice so there can add the payment via their payment system. NHS England believe it is appropriate that there are assured that public funds are only used for the services of an interpreter during an NHS appointment, hence the need for an invoice as evidence.

The information below is the response that is sent to Dental Practices who send in a query in relation to booking interpreters:

At the current time, we are trying to work with the CCGs to charge us back for interpreting services required for patients visiting Dental practices, but we do not have a timeframe as to when any agreements will be made. During this interim period, the best way forward would be for you to pay the interpreter directly and then charge us back by sending an invoice to us. The payment is then made to you via the BSA CoMPASS system.

The invoice must be sent on practice headed paper addressed to us and should contain the requirements as shown below:

Main body of the invoice must have the following:-

- *Clearly States if it is an Invoice or Credit Note*
- *Provides clear details of the organisation/practice submitting the invoice and includes the remittance address*
- *Provides clear details of all Goods / Services paid for with the date and time and duration of the appointment*
- *Is Legible*
- *Has a Valid Invoice Date (Tax Point) and Invoice Number*
- *Clearly states the payee*
- *Invoice Adds Up Correctly (Handwritten Invoices in Particular)*

- *Includes the relevant supporting information, for example timesheets or the bill received from the translation service for the appointment.*
- *No personally identifiable data is to be put on an invoice; this includes any patient names and addresses. Only use initials or the patients NHS number where appropriate.*

We know from further conversations with NHS England that once an email/invoice is received it's processed within 5 working days. The payment would then be added to the BSA CoMPASS system and the provider would be paid during the next pay run. So, if the payment had been put on just after a pay run it would be paid within the next pay run and should not take any longer than 1 month.

Unfortunately, this notice is only sent to those dental practices that enquire about the spoken language interpreter/ BSL service. We believe it would be beneficial for patients whose first language is not English for NHS England to send a formal letter to each dental surgery in Enfield explaining the payment system. This may spur practices to use the service more frequently.

We then asked NHS England whether the provision of BSL/spoken language interpreters was part of the dentist's contract and what the uptake of this service was in the Enfield area.

We were informed that while interpretation services are not mentioned expressly in the NHS General Dental Service contracts, provision for those patients requiring the service are made under the following clauses:

68. The Contractor shall provide, in relation to all of the services to be provided under the Contract, such other facilities and equipment as are necessary to enable it to properly perform that service.

261. The Contractor shall comply with all relevant legislation and have regard to all relevant guidance issued by the Board and the Secretary of State.

Unfortunately there were unable to provide us with the statistical information in regards to the uptake of the interpreter services as payments as processed on an ad-hoc basis. So we asked what the uptake for interpreting services for London was and the number of dental practices in the London area they were not able to provide us with this information either.

We also wanted to find out some information about the way in which dentists charge for treatment, whether private fees are regulated and asked NHS England and the General Dental Council a series of questions, please see their response in the table below.

	Questions	NHS England Response	General Dental Council response
1.	Are NHS dentists allowed to apply a fee on top of NHS charges?	NHS dentists are not allowed to apply a fee on top of NHS charges for NHS treatment. They can however, offer private treatment in addition to or instead of NHS treatment and this must be properly explained to the patient and consent obtained prior to the provision of treatment.	No, they cannot, with the exception of the right to charge for white filling at the back of the mouth (around £95.00).
2.	If yes, is this fee regulated or do the dentists have the flexibility to apply any level of fees?	We cannot comment, as fees for private treatments are not regulated by the NHS. Any patient queries relating to private treatment should be referred directly to the General Dental Council.	The General Dental Council do not advise on the ways in which dental fees are set and regulated; for this I would refer you to call NHS England on 0300 3112233.
3.	How are fees charged by private dentists regulated? Are they allowed to charge what they like?	We cannot comment as fees for private treatments are not regulated by the NHS. Any patient queries relating to private treatment should be referred directly to the General Dental Council.	There is no regulator of private dental charges.
4.	If your dentist is providing both NHS and Private treatment can the patient choose which they prefer? Can the dentist impose additional charges?	Dentists are not allowed to apply a fee on top of NHS charges for NHS treatment. Patients have the choice to opt for NHS or private treatment or a combination of both. The dentist must obtain consent for the provision of treatment whether it is NHS or private and must make clear the treatment and charges.	The options must be explained and the patient's wishes accommodated, unless the NHS list is closed.
5.	Are dentists allowed to change your treatment from NHS to private without consulting you first?	Dentists need to obtain consent for the provision of treatment whether it is NHS or private and cannot change from NHS to private without consulting the patient.	In short, no they may not.
6.	How is the decision made whether you are entitled to NHS treatment or whether you have to be treated as a private patient?	If the patient wishes to be seen for NHS treatment, they should make this clear when they book the appointment. The practice will be able to advise whether they have capacity.	The Department of Health can answer this question.

You will notice that in regard to question 2 that there is currently no regulator for private dental fees, in essence a dental practice could choose to charge what they want for private dental care.