



## Consultation on the reform of NHS dental services in Wales

**June 2025**

Age Cymru is the leading national charity working to improve the lives of all older people in Wales. We believe older people should be able to lead healthy and fulfilled lives, have adequate income, access to high quality services and the opportunity to shape their own future. We seek to provide a strong voice for all older people in Wales and to raise awareness of the issues of importance to them.

### Online payments

Older people are more likely to be digitally excluded. Only 41% of people over 75 have basic digital skills and digital access is lower in many rural areas. Introducing a payment system that is online only means some older people will be unable to pay independently of family and friends and so it is vital other payment options are available. Before such changes are made, further work is needed to understand how those without digital payment means can pay for their treatment. The payment system must include the ability for digitally excluded people to be able to pay for their care offline.

We also have a concern regarding the opportunity for these changes to be exploited. Over recent years the moves to digital technology have resulted in an increase in fraud and scam-related activity. To reduce the possibility of older people being defrauded or experiencing fraudulent activity it is important that the changes to how people pay are accompanied by an extensive publicity campaign that clearly explains how people pay for their dental care.

Full consideration needs to be given on the volume of telephony services required for patients to have timely access to advice on payment options and how older people that are isolated and/or offline can be reached through the publicity campaign.

### Single route of entry via the Dental Access Portal

It is important that the new arrangements consider how older people can be supported to have the continuity of care they need from the same trusted professionals.

Older people are less likely to drive and reductions in the availability and reliability of public transport would leave some older people unable to access services.

Reductions in public transport is affecting many older people's ability to get to appointments as well as their ability to have a social life. The DAP system must be able to identify patients who would not be able to travel and those that have difficulty travelling to a non-local practice and support them to find an accessible dental practice.

Respondents to our 2025 annual survey told us that they have registered on the portal but are far from clear how long they will have to wait to see a dentist. We recommend that a system be introduced to allow patients to assess how long they are likely to wait for the appointments they need. This will allow people to make an informed decision on whether to wait for NHS care or whether, if they have the financial means, they choose to seek private care.

#### Reasonable adjustments - Failure to Attend

The increasing number of older people living with multiple health conditions, the predicted increase in the number of people living with dementia, the increased volume of unpaid carers in Wales, and the access to and unreliability of public transport for older people, are all factors that can contribute to a failure to attend for matters that are beyond control of the patient.

We would like to see some clarity on whether the EIA has considered the additional, cumulative barriers for increasing numbers of people with more than one protected characteristic and taken that into account. Further adjustments should be considered for people experiencing multiple issues affecting DNAs as a result of that assessment if needed.

#### Changes to recall intervals

Reassuring patients that the changes in recall are based on clinical need and not lack of availability in NHS dentistry is needed to ensure that older people who have been used to regular check-ups for many years do not waste their valuable savings paying privately for dental care that they do not need.

It is important that a further campaign is launched that explains the reasoning for tailored recall and how to get an appointment in the interim if needed accompanies the changes to allow the public to get on board with changes and use the new system effectively.

#### Charging

The Equality Impact Assessment acknowledges that older people may face higher financial burdens. We are concerned that there is insufficient detail included on the demography of the 1% of patients calculated to be affected by charging changes in the Equality Impact Assessment. Many older people in Wales are increasingly struggling financially, most live on a fixed income so have no other means to meet the multitude of increasing costs including water, fuel, food, council tax, amongst others.

The cost of a crown falls outside of this charge cap of £384. The accumulated effects of ageing mean older people are more likely to need crowns and as such, this represents a disproportionate cost. Whilst the benefits of increasing access to NHS dentistry for all in the proposals is clear, this should not be at the expense of older

people who have not had access to an NHS dentist and as a result require much remedial work.

Dental services' training requirements

The consultation details the contract pricing but does not include wider aspects of contract arrangements. The ageing population of Wales and the projected increases in those living with more health conditions and number of people living with dementia mean that services need to be able to provide care appropriate to their circumstances. We would like to see details regarding training requirements for dental surgery staff, over and above the requirements on medical training. In particular we would like to see dementia awareness training included as a requirement.

Communication plans on changes to dental contracts

The changes in how people get dental care and how they pay for it need a wide-ranging, clear and accessible publicity campaign accompanying the changes using a variety of online and offline communication media. This must consider those that are isolated and those that are digitally excluded. The resourcing required should be fully considered as part of the change.

Age Cymru is a registered charity 1128436. Company limited by guarantee and registered in Wales and England 6837284. Registered office address Ground Floor, Mariners House, Trident Court, East Moors Road, Cardiff CF24 5TD. © Age Cymru 2025.