

Response of Envisage Dental to the CMA's Statement of Scope in connection with the Private Dental Services Market Study

2 April 2026

1. Introduction

- 1.1 Envisage Dental is a UK dental group dedicated to high quality private dentistry that prioritises long-term patient outcomes, transparency and choice. Envisage Dental was founded in 2014 by husband and wife, Harry Gill and Dr Sandy Dau, and has grown to over 85 clinics across England. The vast majority of Envisage Dental's provision relates to private dental services.
- 1.2 Envisage Dental welcomes the opportunity to engage with the CMA in relation to its private dental services market study. This study comes at a time of growing demand for private dental services as the NHS dental system is facing significant capacity constraints.
- 1.3 The private dental market plays an essential role in providing access to care, improving clinical outcomes through preventative care and innovation as well as reducing pressure on NHS services. In our experience, the private market is highly competitive and is working well in delivering positive outcomes for patients.
- 1.4 This response sets out Envisage Dental's comments on the Statement of Scope published by the CMA on 5 March 2026. We look forward to working with the CMA over the next year and would welcome the opportunity to discuss any of the points raised in this response in due course.

2. Proposed scope of the market study (Q1)

- 2.1 Envisage Dental supports the proposed scope of the market study as set out in the Statement of Scope. This section provides our comments on the Statement of Scope in relation to NHS dentistry.
- 2.2 NHS dentistry in the UK, particularly in England and Wales, is facing significant challenges and capacity constraints. As a result, there is limited availability of NHS dentistry services in many areas and patients often face long waits to access care. These capacity constraints are caused by a number of factors including a funding structure that restricts investment, together with a shortage of trained professionals across the NHS and private sectors¹.
- 2.3 Private provision of dentistry provides a vital complement to NHS provision and supports a number of positive outcomes for patients including:

¹ Last year the [Association of Dental Groups](#) stated: "There are currently over 3,000 unfilled vacancies for dentists across the NHS and private sectors. Data published by NHS England for the period to March 2024, show there were 2,749 full-time equivalent (FTE basis) NHS dentist vacancies. These are roles that have been open for an average of 180 days per post. Furthermore, with 411 (FTE basis) vacancies in private practices still open, it is clear that irrespective of the need for NHS contract reform, there is a system-wide shortage of dentists in the UK across the profession's 'mixed-economy'."

- (a) timely access to care. Without private provision many patients would face delayed or unmet care needs as they struggle to find suitable NHS provision;
 - (b) delivery of leading preventative care that prioritises long term patient care and reduces the need for invasive procedures; and
 - (c) investment in top of the range facilities, technology and staff to deliver exceptional outcomes for patients.
- 2.4 Within private dentistry there are different models of delivery. Some dental groups, such as Envisage Dental,² focus on private dental provision with only a very small proportion of revenues derived from NHS care. At these clinics patients are clear at the outset of the patient journey that they will be receiving private care, they receive all necessary information around the relevant services and pathways available to them, and have chosen to proceed on that basis.
- 2.5 Other dental groups operate a mixed model, whereby NHS funded services represent a significant proportion of each clinic's revenue. The current NHS funding model in England means that it is sometimes unviable to provide NHS funded treatment for complicated procedures. This can mean that patients start the patient journey as an NHS patient (e.g. for the initial check-up), but may be given a choice to switch to private provision for any further treatment or care, including where further services (e.g. elective care) may not be available through the NHS. This can create confusion and frustration for patients.
- 2.6 In addition, patients registered with mixed-model practices may have faced significant challenges and have waited for an extended period to find a dental practice that is accepting new NHS patients. Having invested such time and effort, these patients are generally less likely to seek treatment elsewhere, even for services that fall outside the NHS offering.
- 2.7 Envisage Dental therefore welcomes the CMA's proposal to look at publicly funded dentistry when it affects provider incentives and/or competitor/consumer outcomes in the private dentistry market. The interaction between publicly and privately funded dentistry is particularly relevant for dental groups that operate a mixed model.
- 3. **The market is working well for patients (Q3)**
 - 3.1 In our experience the private dental market is highly competitive and delivers good outcomes for patients. In this section we have provided some initial comments on how the market is delivering positive outcomes for patients and we look forward to working with the CMA to provide further evidence on these points during the course of the market study.

The private dental market is highly competitive
 - 3.2 As recognised in the Statement of Scope, the private dental market is highly fragmented with approximately two thirds of dental practices being owned by independent operators with 1-2

² The vast majority of Envisage Dental's revenues relate to private dental provision.

sites. Larger dental groups with over 30 sites (which includes Envisage Dental) account for less than 20% of the 12,000 total dental practices in the UK.³

- 3.3 This competitive position at the national level also plays out at a local level, with the vast majority of consumers having a large number of providers to choose from in each local area. All providers compete in the same market and Envisage Dental often competes as closely with independent operators having a single practice as it does with other dental groups.
- 3.4 As a result of competition, customers have a range of choices to meet their varied needs and budgets.

Customers have the information to make informed choices

- 3.5 As explained above, Envisage Dental is focussed on the provision of private dental services and the vast majority of customers join an Envisage Dental clinic as a private patient.⁴ Patients are informed during their enrolment that the clinic operates on a private basis, providing transparency and ensuring that customers consent to receiving privately funded treatment.
- 3.6 As directed by the General Dental Council, prices for Envisage Dental's treatments are clearly set out for customers before treatment starts.⁵ Prices for initial examinations are available online, as well as at the practice, and are clearly signposted to customers before booking. If any follow-up treatment is required, patients are provided with a treatment plan which includes the proposed treatment and a realistic indication of the cost, and agree to the plan before any further treatment is commenced.

Private providers make significant investment in the dental sector

- 3.7 Envisage Dental is focussed on delivering first rate care to its patients at each and every interaction. To do this it makes significant investments in its facilities, staff and new technology. For example:
- (a) we provide leading levels of training and funding to clinical and non-clinical staff;
 - (b) we invest in cutting edge technology, for example, in relation to intra oral scanners, 3D printing and guided biofilm therapy devices, as well as AI diagnostic tools;
 - (c) we invest significantly in innovative treatments and equipment that seek to advance the preventative care aspects of dental health; and
 - (d) we continue to invest in our clinics alongside regular inspections to ensure we deliver the highest possible standards.

³ Statement of Scope, paragraph 17.

⁴ As noted at paragraph 1.1, Envisage Dental provides publicly funded dental services at two of its clinics.

⁵ See Principle 2 of the General Dental Council's Standard for the Dental Team: [Standards for the Dental Team.pdf](#)

- 3.8 This focus on patient care and investment is reflected in overwhelmingly positive feedback from our patients. In FY 2025, Envisage Dental had a market leading Net Promoter Score of 84, up from 83 in FY 2024.
- 3.9 Envisage Dental trusts that these comments on the CMA's Statement of Scope are of assistance, and looks forward to engaging further with the case team as the market study proceeds.