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To: **CMA Market Study Team**
25 Cabot Square, London E14 4QZ

Subject: Response to CMA Statement of Scope: Private Dental Services Market Study

Submission Date: 30th March 2026

Summary

DentaClarity welcomes the CMA’s market study into private dentistry. As a prospective market entrant, we identify significant "demand-side" weaknesses where patients struggle to compare complex treatment pathways before committing to a provider. We advocate for a **common comparability framework** developed collaboratively with the profession that would enable market-led innovation and allow third-party platforms to provide the transparency consumers clearly desire. Our response focuses on moving from "informed acceptance" to true "informed choice."

Introduction & Motivation

I am writing as a prospective market entrant in private dentistry and founder of DentaClarity, a UK dental patient-facing transparency and comparability platform in development by N4tek Ltd, with a planned launch in 2026.

My motivation for building DentaClarity is rooted in personal experience. Earlier this year, I needed a high-value dental treatment and found myself unable to understand what it would realistically cost before committing to a provider. Despite spending considerable time researching, I could not make a meaningful comparison between practices. That experience, shared I believe by many patients, led me to investigate the market more deeply and ultimately to develop a platform designed to address it.

I want to be clear from the outset that this submission is not intended as a criticism of dental practices, professional bodies, or existing regulatory frameworks. Dentistry is a complex and demanding profession, and practices operate under significant financial, regulatory, and operational pressures. We recognise that many practices already make genuine efforts to provide transparent pricing within the constraints they operate under. The challenge this submission addresses is **structural rather than one of conduct**. I am responding in a collaborative spirit, and I hope DentaClarity can contribute constructively to whatever outcomes the CMA's market study recommends.

Market Analysis: Responses to Statement of Scope

Q3 — Does the private dentistry market currently display the characteristics of a well-functioning market?

In our assessment, the market does not currently function as effectively as it could for patients at the point of decision-making, though we recognise this is a **structural challenge** rather than a failing of any individual part of the system.

Private dental treatment is inherently complex to price. Treatment pathways vary between patients, clinical needs can evolve after initial assessment, and practices must balance transparency obligations with the reality that final costs are sometimes only determinable after examination. We acknowledge this complexity fully, and we do not believe it reflects poorly on the profession.

It is also important to recognise the broader economic context within which private dental practices operate. According to BDA analysis of 2023/24 NASDAL data, NHS dental services in England require **an annual cross-subsidy of over £400 million** from private activity to remain financially viable. We recognise the complex economics of modern dental practice, where private-pay services often provide the essential financial stability that allows practices to maintain broader clinical access. Any framework that seeks to improve price transparency for patients must be designed with this reality in mind and must not inadvertently place additional burdens on practices that are already operating under considerable financial pressure.

However, in a sample review of London dental practice websites within a defined and limited scope, we observed that even where pricing information is published, and many practices do so conscientiously in line with professional guidance, it is often presented in ways that make pricing comparison difficult in practice:

- Pricing information is sometimes located within multi-step navigation paths rather than being immediately accessible.
- Treatment prices are frequently published in non-standardised formats, making like-for-like comparison difficult.
- Associated treatment costs, such as consultation fees or diagnostic requirements, may appear separately from headline procedure prices.
- Terminology and treatment categorisation varies across practices, making it hard for patients to compare equivalent treatments.

The result is that patients who wish to compare pricing information and treatment pathways before choosing a provider face a considerable research burden. This is not because practices are withholding information, but **because there is no common comparability framework that makes the information easily comparable**. This is the gap we believe the market study has an opportunity to address collaboratively with the profession.

Q5 — Consumer journey and informed choices

The most significant gap in the consumer journey occurs before the first appointment. Patients who have received a diagnosis or are considering a high-value treatment need to understand realistic total costs before selecting a provider, yet the information available to them at this stage is typically insufficient to support a meaningful comparison.

By the time a patient has attended an initial consultation and received a treatment plan, they are already meaningfully engaged with a practice. The time, effort, and in many cases the cost of that consultation creates a natural inertia. Switching providers at that stage is possible, but for many patients, particularly those in discomfort or under time pressure, it is not a realistic option. **The practical result is that informed choice, for many patients, gives way to "informed acceptance."**

This is not a criticism of how practices conduct consultations. It is an observation about where in the journey consumer decision-making support is currently limited. A patient who can understand realistic cost ranges before their first appointment is better placed to choose a provider that suits their needs and is likely to arrive at that appointment with clearer expectations. This benefits both the patient and the practice.

Q6 — Vulnerable consumers

The difficulty of comparing dental costs before committing to a provider falls unevenly across the patient population. In our view, those most affected include:

- Patients with limited digital confidence, who may find it harder to navigate multiple practice websites to piece together comparable pricing information.
- Patients on lower incomes, for whom the ability to compare costs before committing is most financially significant.
- Patients experiencing pain or dental anxiety, for whom the urgency of their situation reduces the time available to conduct thorough pre-appointment research.

In each case, the patients who would benefit most from accessible cost information are those currently least able to access it. A more consistent approach to how pricing is presented, across formats and across practices, would disproportionately benefit these groups without placing unreasonable demands on practices.

Q9 — Conduct adversely affecting consumers

Our sample review of London dental practice websites identified a recurring pattern in how the total cost of dental treatment pathways is communicated to patients. In the **absence of a common industry standard** for presenting multi-component treatments, the full picture of what a patient might pay, including associated consultations, diagnostics, or preparatory procedures, is not always visible in a single place or at the point when a patient is first researching their options.

We wish to be clear that we do not interpret this as deliberate or inappropriate conduct by individual practices. Dental treatment is genuinely complex, and practices face real challenges in presenting pricing that is both accessible to patients and honest about clinical variability. The pattern we observed is, in our view, a natural consequence of the absence of agreed standards for how treatment costs should be structured and presented, rather than a reflection of the intentions of the practices themselves. **Addressing this through clearer structural guidance, rather than through a conduct-based intervention, would serve both patient and practice interests**.

Q10a — Regulatory frameworks

The General Dental Council has made meaningful efforts to encourage price transparency through its guidance. The challenge, as we see it, is not one of intent but of infrastructure: guidance that operates at the level of publication, without specifying format or categorisation, cannot on its own deliver the comparability that patients need or that third-party platforms require to function effectively.

As noted in recent CMA market studies, standard price lists can be limited when multiple treatments are combined. We believe a common framework would allow for the comparison of bundled treatment pathways, reducing the risk of 'drip pricing' and improving the accuracy of pre-appointment estimates.

We would suggest the CMA consider whether the most impactful next step would be the **introduction of a proportionate common comparability framework, developed collaboratively with the profession.** This could include consistent treatment categories, clearer terminology, and more standardised approaches to presenting prices and typical treatment pathway inclusions.

Such an approach would preserve clinical discretion while improving comparability for patients and enabling the potential for market-led innovation. For example, defining what a crown journey typically includes end-to-end would give patients a consistent basis for comparison and would reduce the time practice managers currently spend explaining cost variations, allowing them to focus on clinical care. We believe such a framework could benefit practices as well as patients by reducing the administrative burden of determining individual approaches to price communication.

Strategic Alignment & Conclusion

We note that the CMA's recent veterinary market work has highlighted the role that structured transparency can play in improving consumer outcomes. DentaClarity aims to offer a market-led approach with the potential to align with these objectives, and we would welcome the opportunity to explore whether such an approach could complement or inform the CMA's recommendations in this sector.

We are available to provide further information, share observations from our research, or demonstrate the platform as it develops. We would also be pleased to participate in any stakeholder engagement process the CMA convenes.

About DentaClarity

DentaClarity is a UK dental patient-facing transparency and comparability platform in development, designed to enable patients to search and compare dental treatment costs and facilities by location before booking an appointment. It is built around the principle that **cost clarity should be available before, not after, a patient chooses a provider.**

Our goal is to help practices gain visibility among patients whose needs and budgets specifically align with their services, ensuring that transparency becomes a tool for better patient engagement**.** We believe that practices which offer clear and accessible pricing will attract more of the patients they are best placed to serve, and that a transparent market ultimately supports sustainable private dental businesses as well as better patient outcomes. The platform is currently in preparation for launch in 2026 at www.dentaclarity.com