

Dr John Lockwood
Chairman, Dental Board of Australia



Re: Scope of Practice Public Consultation

On behalf of the clinical staff of Northeast Health Dental Service, I would like to thank the Dental Board of Australia (the Board) for the opportunity to provide feedback as part of the Consultation process on a proposed revised Scope of practice registration standard and Guidelines for scope of practice.

Our service is supportive of the proposed changes to the Scope of Practice registration standard and Guidelines for Scope of Practice set out in Option 2 of the Consultation paper

Northeast Health Dental Service commend the Board for its continuing work on the Scope of Practice registration standards and guidelines and acknowledge the objectives of the National Registration and Accreditation Scheme and the regulatory principles that have informed the review and consultation process. We recognise the important objectives of the National Scheme as protection of the public, access to health services, and enabling a flexible, responsive and sustainable workforce.

Scope of practice is an evolving process which should reflect contemporary dental practice, it is appropriate that the Board has conducted this review and we agree with the content and structure of the proposed registration and guideline and are supportive of the proposed changes to the Scope of Practice registration standard and Guidelines for Scope of Practice set out in Option 2 of the consultation paper

1. From your perspective, how is the current registration standard and guidelines working?

- *The principle to enable a flexible, responsive and sustainable workforce by enabling dental practitioners to practice to the full scope of their education, training and competence is supported.*

2. Are there any issues that have arisen from applying the existing registration standard and guidelines?

- *The requirements for a 'structured professional relationship' and the clause that dental hygienists, dental therapists and oral health therapists must not practise as 'independent practitioners' have created confusion amongst the dental profession and is an unnecessary over-regulation.*
- *All dental practitioners must seek advice and refer patients when patient needs are beyond the individual's scope of practice.*

3. Is the content and structure of the proposed revised registration standard and guidelines helpful, clear, relevant and more workable than the current registration standard and guidelines?

- *Northeast Health Dental Service supports the AHPRA Code of Conduct as the basis for professional performance of registered health professionals. The Code of Conduct recognises team-based, collaborative oral health care, patient engagement and communication.*

4. Is there any content that could be changed or deleted in the proposed revised registration standard and guidelines?

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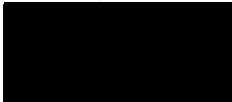
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- Northeast Health Dental Service is *satisfied with the proposed revised registration standard and guidelines.*
- 5. Do you think that a review period of at least every five years (rather than three) is appropriate? Why or why not?**
 - Northeast Health Dental Service has *no preference for the review period on the registration standard and guidelines.*
- 6. Do you have any other comments on the proposed revised registration standard and guidelines?**
 - Northeast Health Dental Service *considers that the revised standard balances issues of access to care with public safety by those providing dental services in Australia*
- 7. Is the content and structure of the new reflective tool helpful, clear and relevant?**
 - *Such a tool will assist Northeast Health Dental Service in supporting practitioners through the organisations professional development program as well as monitoring requirements of credentialing and scope of clinical practice*

Yours sincerely



Patricia Voss
PRACTICE MANAGER



Dr Emily Pegan
SENIOR DENTIST