



Australian
Dental
Council

SUBMISSION

to

Dental Board of Australia

on

PROPOSED REGISTRATION STANDARD: SECTION 66

**Limited Registration of Dental Practitioners
for Postgraduate Training or Supervised Practice**

18 March 2011

1. Introduction

- 1.1 The Australian Dental Council [**ADC**] appreciates the invitation of the Dental Board of Australia [the **Board**] to comment on the Board's proposed registration standard under section 66 of the *Health Practitioner Regulation National Law Act 2009* [the **National Law**] covering limited registration of dental practitioners for postgraduate training or supervised practice.
- 1.2 The introduction to the consultation draft indicates that the proposed registration standard is to provide an appropriate form of registration for the limited purpose:
for employment in a Public Sector Dental Workforce Scheme, to undertake the Australian Dental Council exam or other exam required by the Board, or to undertake postgraduate studies.
- 1.3 The ADC makes this submission as the external accreditation authority that has been assigned by the Ministerial Council to undertake the accreditation functions for the Dental Board of Australia under the National Law. The accreditation function references in the National Law that are particularly relevant to this registration standard are under s.42:
- (c) *assessing authorities in other countries who conduct examinations for registration in a health profession, or accredit programs of study relevant to registration in a health profession, to decide whether persons who successfully complete the examinations or programs of study conducted or accredited by the authorities have the knowledge, clinical skills and professional attributes necessary to practise the profession in Australia; or*
 - (d) *overseeing the assessment of the knowledge, clinical skills and professional attributes of overseas qualified health practitioners who are seeking registration in a health profession under this Law and whose qualifications are not approved qualifications for the health profession;*

2. Specific Comments on the Proposed Registration Standard

- 2.1 For ease of reference the ADC comments on the draft Registration Standard are set out in table format in the following pages. Where the ADC is proposing specific changes in wording these are highlighted in both the text of the consultation draft *Standard* and in the ADC suggested wording.

Australian Dental Council
East Melbourne, Vic

18 March 2011



Contact

For further information please contact:

Dr Robert Broadbent
Chief Executive Officer
Australian Dental Council
Tel: (03) 9657 1777
Fax: (03) 9657 1766
e-mail: ceo@adc.org.au

Consultation Draft	ADC Comment/Suggested Wording
<p style="text-align: center;">REGISTRATION STANDARD</p> <p style="text-align: center;">Section 66 – Limited Registration of dental practitioners for postgraduate training or supervised practice</p> <p>Authority</p> <p>This Registration Standard has been developed by the Dental Board of Australia ('the Board') for consultation under section 38 of the <i>Health Practitioner Regulation National Law Act 2009</i> ('National Law').</p> <p>Summary</p> <p>The Standard sets out the requirements of the Board to register dental practitioners, who are not qualified for general registration, to undertake postgraduate training or supervised practice, under section 66 <i>Limited Registration for postgraduate training or supervised practice</i> ('Limited registration – training /supervised practice') of the National Law.</p> <p>The Standard sets out both the initial and ongoing requirements of Limited registration – training/supervised practice. (Additional requirements for registration under Limited registration – training/supervised practice are set out in the relevant Board Guideline for the specific pathway of Limited registration – training /supervised practice.</p> <p>The key requirement of Limited registration – training /supervised practice is that the Board must be satisfied that the dental practitioner has completed a qualification that is relevant to and suitable for postgraduate training or supervised practice. In addition, there are requirements for the specific pathways for registration under Limited registration – training /supervised practice, which are set out below.</p>	<p>With the advent of graduate entry programs for professional entry level qualifications there is a need for a definition of 'postgraduate training' in order to avoid confusion or ambiguity. It is suggested that the term as used in this standard have the meaning: 'post-initial education or training'.</p>
<p>Scope of application</p> <p>This standard applies to overseas trained dental practitioners who are applying for limited registration to undertake postgraduate training or supervised practice under section 66 of the National Law or for renewal of limited registration for postgraduate training or supervised practice under Part 7 Division 9 of the National Law.</p>	

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<p>Pathways for Limited registration – training / supervised practice</p> <p>The pathways for Limited registration – training /supervised practice and specific requirements are:</p> <p>Pathway A - Supervised Practice – Practising <u>only</u> under supervision and <u>either</u>:</p> <ol style="list-style-type: none"> 1. an employment relationship with an <i>appropriate public sector program</i>; or 2. enrolment in the <i>Australian Dental Council (ADC) final clinical exam</i> and/or in a clinical training or assessment program in preparation for an <i>ADC exam</i> or in another examination required by the Board for registration under section 53(c) of the National Law. <p>Pathway B - Postgraduate Training - Enrolment in an <i>Approved postgraduate program of study</i> or other postgraduate training program approved by the Board.</p>	<p>ADC terminology may change. It is suggested that generic terminology be used, as in: the <i>clinical examination component of the Australian Dental Council (ADC) examinations pathway</i>. And ‘an ADC exam’ be replaced with: <i>an ADC clinical examination</i>.</p>
<p>Requirements</p> <p>The requirements of the Board for registration in Limited registration – training /supervised practice are:</p> <ol style="list-style-type: none"> 1. Compliance with the requirements of section 65 of the National Law – Eligibility for Limited registration. 2. An overseas <i>undergraduate</i> dental qualification which is relevant to and suitable for postgraduate training or supervised practice. These qualifications will be: <ol style="list-style-type: none"> a) for dentists, an <i>undergraduate</i> dental qualification from the <i>ADC approved list</i>, or b) for all other dental practitioners (including dentists with an <i>undergraduate</i> dental qualification from <i>countries</i> not on the <i>ADC approved list</i>) a qualification which is of equivalent duration to an Australian graduate in the division of the Register of Dental Practitioners they are seeking registration in. As a guideline the Board will apply the following minimum requirements: 	<p>Many relevant overseas qualifications are from graduate entry programs. To avoid confusion or ambiguity, change (2) to read:</p> <ol style="list-style-type: none"> 2. An overseas <i>professional entry level</i> dental qualification which is relevant to and suitable for... <p>And (a) to read</p> <ol style="list-style-type: none"> a. for dentists, <i>a professional entry level</i> dental qualification from the <i>ADC approved list</i>, or <p>The <i>ADC Approved List</i> lists accredited institutions in selected countries. So clause (b) should be changed to read:</p> <ol style="list-style-type: none"> b. for all other dental practitioners (including dentists with <i>a professional entry level</i> dental qualification from <i>institutions</i> not on the ADC approved list).... <p>.....</p>

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<ul style="list-style-type: none"> • Dentist - 4 years full-time; • Dental Prosthetist – 3 years full time including dental technical course; • Oral Health Therapist – Bachelor of Oral Health 3 years full time; • Dental Therapist and Dental Hygienist – 2 years full time and dual qualified 3 years full time. <p>3. Practice only in accordance with the Board’s <i>Guidelines on Supervision</i> and comply with the Supervision Plan and Supervision Report requirements (as set out in the Board’s <i>Guidelines on Supervision</i>) if required.</p> <p>4. Compliance with the requirements of the Board’s <i>Guidelines on Infection Control</i> and a declaration (at initial application and renewal of registration) of infection status for blood-borne viruses.</p> <p>5. Compliance with the Board’s English Language Skills Registration Standard.</p> <p>6. Provide evidence of current registration to practise and recency of clinical practice in accordance with the Board Guideline for the specific pathway of Limited registration – training /supervised practice.</p> <p>In addition, for Pathway A-1 for Limited registration – training /supervised practice (for definition see first page of Standard):</p>	<ul style="list-style-type: none"> • Dentist - 4 years full-time; • Dental Prosthetist – 3 years full time including dental technician course; • Oral Health Therapist – Bachelor of Oral Health 3 years full time; • Dental Therapist and Dental Hygienist – 2 years full time OR dual qualified 3 years full time.
<p>7. A:</p> <ul style="list-style-type: none"> a. dentist with qualifications from the <i>ADC approved list</i> is <u>granted an exemption</u> from the preliminary ADC exam b. dentist with an undergraduate dental qualification from another country, not on the <i>ADC approved list</i>, must complete the preliminary ADC exam. <p>8. Completion of the ADC final clinical exam:</p> <ul style="list-style-type: none"> a. for a dentist with qualifications from the <i>ADC approved list</i> within three years of being employed in the <i>appropriate public sector program</i> 	<p>As indicated above, ADC terminology may change. It is suggested that generic terminology be used, as in the changed wording below:</p> <p>7. A:</p> <ul style="list-style-type: none"> a) dentist with qualifications from the <i>ADC approved list</i> is <u>granted an exemption</u> from the written examination component of the ADC examinations pathway’ b) dentist with a professional entry level dental qualification from another country, not on the <i>ADC approved list</i>, must complete the written examination component of the ADC examinations pathway’. <p>8. Completion of the clinical examination component of the ADC examinations pathway’:</p> <ul style="list-style-type: none"> a) for a dentist with qualifications from the <i>ADC approved list</i> within three years of commencing employment in the <i>appropriate public sector program</i>

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<p>b. for a dentist with an undergraduate dental qualification from another country, not on the <i>ADC approved list</i>, within one year of being employed in the <i>appropriate public sector program</i> (this may be extended for an additional year only with the agreement of the public sector employer and the Board).</p>	<p>b) for a dentist with a professional entry level dental qualification from another institution, not on the <i>ADC approved list</i>, within one year of commencing employment in the <i>appropriate public sector program</i> (this may be extended for an additional year only with the agreement of the public sector employer and the Board).</p>
<p>Length of registration period and ability to renew Limited registration</p> <p>Pathway A-1 (for definition see first page of Standard)</p> <ul style="list-style-type: none"> • Dentists with qualifications from the <i>ADC approved list</i> - Limited registration – training /supervised practice registration is granted for a maximum period of three (3) years renewable annually. • Dentists with an undergraduate dental qualification from other countries not on the <i>ADC approved list</i> - Limited registration – training /supervised practice registration is granted for a maximum period of two (2) years renewable annually. 	<p>As above, suggested rewording as follows:</p> <p>Pathway A-1 (for definition see first page of Standard)</p> <ul style="list-style-type: none"> • Dentists with qualifications from the <i>ADC approved list</i> - Limited registration – training /supervised practice registration is granted for a maximum period of three (3) years renewable annually. • Dentists with a professional entry level dental qualification from other institutions not on the <i>ADC approved list</i> - Limited registration – training /supervised practice registration is granted for a maximum period of two (2) years renewable annually.
<p>Pathway A-2 (for definition see first page of Standard) Limited registration – training /supervised practice to undertake the ADC final clinical exam and/or a clinical training or assessment program in preparation for an <i>ADC exam</i>, or to undertake an examination required by the Board for registration under section 53(c) of the National Law, is granted for a period of six months, which is renewable for a further six month period if necessary. Where there are special circumstances a period of up to but not exceeding twelve (12) months may be granted at initial registration. The maximum period of registration is 12 months.</p> <p>Pathway B (for definition see first page of Standard) Limited registration – training /supervised practice is granted for a maximum period of three (3) years renewable annually.</p>	<p>As above, suggested rewording as follows:</p> <p>Pathway A-2 (for definition see first page of Standard) Limited registration – training /supervised practice to undertake the clinical examination component of the ADC examinations pathway and/or a clinical training or assessment program in preparation for an <i>ADC exam</i>,...</p>
<p>Notation on the Register of Dental Practitioners</p> <p>Registration in Limited registration – training /supervised practice is granted for a particular purpose and for a limited time. The terms of the Limited registration will be notated on the Register of Dental Practitioners and any practice outside those terms is not permitted.</p>	

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<p>The type of notation that will appear on the public register will be for example: <i>Limited registration for <postgraduate training / supervised practice> is granted under section 66 of the Health Practitioner Regulation National Law Act from <date> to <date> for the purpose of <name of postgraduate training course / name of examination / details of the Public Sector Dental Workforce Scheme work and supervision arrangements> at <location/s>. Practice outside these parameters is not permitted.</i></p>	
<p>Board’s ability to cancel or refuse to Renew the Limited Registration – Training / Supervised Practice</p> <p>The Board may cancel or refuse to renew the Limited registration – training /supervised practice for any of the following:</p> <ol style="list-style-type: none"> a) the registrant’s employment or enrolment in the postgraduate program of study ceases or is terminated b) the registrant fails to comply with supervision requirements c) supervision reports have not been provided to the Board at the required intervals d) the registrant cannot demonstrate compliance with any terms, conditions or requirements on the Limited registration – training /supervised practice e) there is demonstrated unsatisfactory performance in the <i>appropriate public sector program</i> employment position f) the registrant has not met any other requirements of the National Law. <p>Relevant Board Standards, Codes and Guidelines</p> <p>Dental practitioners granted registration in Limited registration – training /supervised practice should be aware of and comply with all the registration standards, codes and guidelines of the Board. The following are specifically relevant:</p> <ul style="list-style-type: none"> • English Language Skills Registration Standard • Guidelines on Supervision – which include the requirements of Supervision Plans and Supervision Reports • Guidelines for registration in Limited registration and supervised practice – provide additional details for specific pathways for registration 	

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<p>under section 66 <i>Limited Registration for postgraduate training or supervised practice</i> of the National Law¹.</p> <ul style="list-style-type: none"> • Guidelines on Infection Control 	
<p>Definitions</p> <p>ADC approved list - the list approved and published on the Australian Dental Council website at: http://www.adc.org.au which includes listed undergraduate dental programs in Canada, Hong Kong, Ireland, Malaysia, Singapore, South Africa, United Kingdom and the United States.</p> <p>ADC exam – This captures both the preliminary (written) and final (clinical) examinations provided by the Australian Dental Council for registration for practitioners with overseas qualifications as set out on its website at: http://www.adc.org.au</p> <p>ADC final clinical exam – This is the exam provided by the Australian Dental Council for registration for practitioners with overseas qualifications as set out on its website at: http://www.adc.org.au/. The general objective of the ADC Final Clinical Examination is to evaluate the clinical competence of the candidate in terms of dental knowledge, clinical skills and professional attitudes for the safe and effective clinical practice of dentistry in the Australian community.</p>	<p>This <i>ADC Approved List</i> is a list of institutions that are accredited by accrediting authorities in overseas countries that are recognised by the ADC. The ADC periodically reviews the list for currency of entries, so the list may change over time. The list might also change as accreditation and examining authorities in other countries are assessed and recognised pursuant to s42(c) of the <i>National Law</i>. It is therefore suggested that to ensure the accuracy and currency of the <i>standard</i> this definition should not list particular countries and should be changed to read as follows:</p> <p>ADC approved list - the list of institutions in overseas countries that is approved by the Australian Dental Council and published on the ADC website at: http://www.adc.org.au.</p> <p>See comments above re the ADC preliminary and clinical examinations. It is suggested that this definition should be changed to read as follows:</p> <p>ADC examinations pathway – This term denotes the process conducted by the Australian Dental Council for the assessment and examination for registration purposes in Australia of practitioners with overseas qualifications. It includes both written and clinical examinations, as described on its website at: http://www.adc.org.au</p> <p>See comments above re the ADC preliminary and clinical examinations, and the suggested new terminology and definition of the ‘ADC exam’. It is suggested that the terminology and definition for <i>ADC final clinical exam</i> should be changed to read as follows:</p> <p>ADC clinical examination – This is the clinical examination component of the ADC examinations pathway. The general objective of the ADC clinical examination is to assess the clinical competence of the candidate in terms of dental knowledge, clinical skills and professional attitudes for the safe and effective clinical practice of dentistry in the Australian community.</p>

¹ These Guidelines currently do not exist but may be developed by the Board.

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<p>Appropriate public sector program – an employer which is a part of a State or Territory Health department or a facility directly funded by a State or Territory Health department. In addition, for dentists with an undergraduate dental qualification from other countries not on the ADC approved list, the public sector employment program must include:</p> <ul style="list-style-type: none"> • a rigorous assessment of the clinical skills and knowledge at the commencement of their employment role; • the first three-month period of employment is within a metropolitan public sector facility; and • in the first three months of employment, a program covering familiarisation with dental practice in Australia, cultural awareness and skill development, provided by the public sector employer. <p>Approved postgraduate program of study – Is a postgraduate program of study which is published in the Board's Approved Programs of Study list under Qualifications which lead to specialist registration for Dentists and available on the Dental Board of Australia's website at www.dentalboard.gov.au</p>	<p>It is suggested that this definition should be reworded as follows:</p> <p>Appropriate public sector program – an employment program which is offered by a State or Territory Health department or a facility directly funded by a State or Territory Health department. In addition, for dentists with a professional entry level dental qualification from other institutions not on the ADC approved list, the public sector employment program must include:</p> <ul style="list-style-type: none"> • a rigorous assessment of the clinical skills and knowledge of the dentist at the commencement of the employment role; • the first three-month period of employment is within a metropolitan public sector facility; and • in the first three months of employment, a program covering familiarisation with dental practice in Australia, cultural awareness and skill development, provided by the public sector employer.
<p>Applications for variation in changed circumstances</p> <p>If a registrant in the Limited registration – training /supervised practice category has a significant change in circumstances, such as a change in the employment position or post graduate program of study, they must submit a new application for limited registration. However, registrants can apply to the Board for a variation if there is a minor change to their circumstances, such as a change in their supervisor or an extension of the registration period if granted for less than 12 months.</p> <p>Review</p> <p>This Registration Standard will commence on the day it is approved by the Australian Health Workforce Ministerial Council. The Board will review this Registration Standard every three years.</p>	