Dental Board of Australia

Regarding the Public consultation document on proposed revised registration standard

Some comments and remarks to consider

- The board is not paying attention to the ordeal and crisis of the overseas-trained dentists (citizens or permanent residents of Australia) with the Australian Dental Council's examining procedures and scoring process.

- As long as the Australian Dental Council continues its unfair, non-transparent, quota-driven, "discriminatory characterized" examining policy towards the Overseas Trained Dentists (already permanent residents or citizens of Australia), then the Australian Dental Board will harvest the consequences of its trust, confidence and reliance on ADC and that result will include among other things: the continuation and prevalence of practices where non-registered dentists are practicing the dental profession, and even dental auxiliaries practicing dentistry, in most Australian states and cities without being granted the ADC certificate or AHPRA registration, as the number which is now in hundreds (that is not exaggerated figure), will exceeds the thousand if the ADC insists on its illogical and irresponsible attitude and treatment for those dentists who have excellent education, degrees, training and experience from overseas countries and they want to practice their life-long profession in this country, but they realize that they are unwanted or undesirable by the dental authorities as it became obvious that the lengthy, unfair, unguaranteed, non-transparent, and most importantly "very costly" process is intentionally and purposely orchestrated to deter and discourage the qualified applicants from proceeding in the accreditation process, and make them feel desperate after several failed attempts.

- It's a disappointing and frustrating reality as the Dental Board and the Dental Council are continuously ignoring and marginalizing all the appeals, complaints and calls submitted to them for this purpose and they keep neglecting and avoid dealing with the raised concerns seriously.

- It's unrealistic what is mentioned in paragraph 18 of the "Public Consultation Document", where it's mentioned the following: *"Competencies of overseas-trained dental practitioners are assessed through the examination process set up by the ADC. This examination process (with written and practical components) is based on the same professional competencies used in the accreditation process of Australian programs of study".* Which is untrue, as even the graduates of those accredited Australian programs of study, if they take the written and practical component of the exams that are required from the overseas-trained dentists, they will fail and not pass the exam, simply because the exams don't test the merit of the applicant, however is governed and scored according to a disgraceful, shameful, quota oriented software program that eliminates most (ought to pass) qualified applicants, according to an undisclosed "passing percent" that the ADC decides secretly each cycle of the exam?!.

- It's a mockery & irony to claim that the proposed changes to the current registration standard and guidelines as mentioned in paragraph 24, will *"Enable a flexible, responsive and sustainable workforce by enabling dental practitioners to practice to the full scope of their education, training and competence"*, as the truth is that the continuation of the ADC in their strict, rigorous and unfair policy will result in an unprecedented number of unregistered dental practitioners, practicing the profession in different ways and in hidden and far from the eyes dental clinics, with all what that follow, from lack of infection control procedures to treatment shortages.

- Under the title *"Programs to extend scope do not lead to registration or endorsement and are offered to dental practitioners already registered, with general or limited registration"*. Well, why such programs are only for already registered practitioners? and why there are no such equivalent programs to extend the scope of overseas-trained dentists in order they pass the accreditation exams? (please don't mention the only course in Australia at U of Melbourne which is hugely expensive!!).

- In paragraph 29, It seems that board policy is to push and orient the dental practitioners towards the CPD courses, and that will be a good suggestion if the costs of such course are reasonable or logical, but when the costs or fees are extravagant and illogical then it's not a good advice, however a kind of advertisement and publicity for those continuing professional development courses that became a greedy commercial business for the majority of lecturers and organizers.

- In paragraph 30, it seems that proposal tries to strip and remove the privileges and benefits that the dental practitioners traditionally enjoyed and practiced, such as the dental and oral Implants, the facial & perioral Botox, the removable orthodontic appliances and treatments…etc

- In paragraph 31, this suggestion of *"The Board will investigate the practice of a practitioner when a peer or member of the public make a complaint and this can include practicing outside of their scope of practice"* as such a proposal will encourage dental personnel and practitioners to become informers and sneak about their friends or colleagues! which will create a hostile environment and aggressive behaviors among dental medium.

- In conclusion the proposal is not touching the important elements that the Board should approach, and relates mainly to the issue of overseas-trained dentists and their dilemma and ordeal with the ADC and its accreditation process which is really the most repugnant and infamous process in all the developed countries of the world.

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