

17th June 2013

Dear Sir/Madam,

I have been made aware of proposed changes to the 'scope of practice' registration standard and I write to express my concern. It is particularly distressing as many of the proposed changes will have a profound effect on my profession of dentistry and the current workforce issues affecting many of us.

I have listed the following issues I have grave concern over:

1. The definition of "structured professional relationship" has been proposed to be changed to allow an "arrangement" between a dentist and dental auxiliaries. In my eyes this leaves scope for a clinic of auxiliaries to be distant (geographically) from the dentist/dental specialist. The problem I can see arising is that patients who may present with a clinical situation requiring attention from a dentist, don't/can't get adequate care. It is unreasonable and naive to expect the public to know the difference between a 'dental practitioner' and a 'dentist' and to then know in advance who they should really be seeing to treat their problem. What is worrying, is that with that in mind, public safety has the potential to be adversely affected.
2. Given the significant problems being faced by private general dentists over the past couple of years due to the oversupply of dentists, I can't see the need to expand the scope of practice for dental auxiliaries. Changes to our profession should be based on an evidenced need for change and Health Workforce Australia is yet to complete projection data for dentistry. Increasing the scope of practice and reducing the prescriptive nature of the standard will further exacerbate current workforce issues.
3. There is the enormous potential for public safety to be undermined. The proposal to "remove supervision requirements in recognition of the team approach" could have serious consequences with regards to this. It makes it very unclear where the medico-legal responsibility for dental diagnosis and dental treatment will rest. The dentist should retain the responsibility (legal and otherwise) for the supervision of the patient since he/she is most qualified member of the dental team. To allow less qualified persons to make potentially irreversible treatment decisions, is irresponsible and fraught with danger.

In conclusion, it is my belief that the Dental Board should reject the proposed changes.

Yours sincerely,

Dr Ian Morrison



17th June 2013