



Feedback template

Public consultation on proposed entry level competencies for dental specialties

Public consultation

The Dental Board of Australia (the Board) in partnership with the Dental Council of New Zealand (the Council) is releasing this public consultation paper on the proposed entry level competencies for dental specialties.

Your feedback

You are invited to provide feedback by email to dentalboardconsultation@ahpra.gov.au by close of business on Monday 15 February 2016.

You are welcome to supply a PDF file of your feedback in addition to the word (or equivalent) file, however we request that you do supply a text or word file. As part of an effort to meet international website accessibility guidelines, AHPRA and the National Boards are striving to publish documents in accessible formats (such as Word), in addition to PDFs. More information about this is available at www.ahpra.gov.au/About-AHPRA/Accessibility.aspx.

How your submission will be treated

1. Submissions will generally be published unless you request otherwise. The Board publishes submissions on its websites to encourage discussion and inform the community and stakeholders. However, the Board retains the right not to publish submissions at their discretion, and will not place on their website, or make available to the public, submissions that contain offensive or defamatory comments or which are outside the scope of the consultation.
1. Before publication, the Board will remove personally-identifying information from submissions, including contact details.
2. You are encouraged to complete the feedback template to assist in focussing responses and to ensure clear presentation and interpretation of your submission.
3. The views expressed in the submissions are those of the individuals or organisations who submit them and their publication does not imply any acceptance of, or agreement with, these views by the Board.
4. The Board also accepts submissions made in confidence. These submissions will not be published on the website or elsewhere. Submissions may be confidential because they include personal experiences or other sensitive information. Any request for access to a confidential submission will be determined in accordance with the *Freedom of Information Act 1982* (Cwlth), which has provisions designed to protect personal information and information given in confidence.
5. Please let the Board know if you do not want your submission published, or want all or part of it treated as confidential.

General information about your submission

Who is the submission from?	Dr Robert Knights-Rayson, Orthodontist. Durban South Africa
If we need to follow up with someone, who should we contact?	Robert Knights-Rayson
Would you like your submission published on the Board's website?	No objection to this

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Specific consultation questions and section for responses
Do you understand the reason why we have developed the proposed competencies and how we are going to use them?
Yes
Comments My comments are set out in a letter
Is there any content that you think should be changed or deleted in the proposed competencies? No
Dento-maxillofacial radiology
Yes/No
Comments
Endodontics
Yes/No
Comments
Forensic Odontology

Yes/No
Comments
Oral Medicine
Yes/No
Comments
Oral Pathology
Yes/No
Comments
Oral Surgery
Yes/No
Comments
Orthodontics
Yes
Comments <p>Section 58(b) of the National Law should not be applied to all cases.....particularly where there is a long interval between the overseas qualification(s) and the 'equivalent' Australian degree.</p> <p>Recognition should be given to the applicant's experience (as is the case with the N.Z. Dental Council)</p> <p>Section 58(c) of the National Law does provide for an assessment.... yet this is deliberately avoided by those delegated to decide on the registration.</p>

Periodontics
Yes/No
Comments
Prosthodontics
Yes/No
Comments
Public Health
Yes/No
Comments
Special Needs
Yes/No
Comments
We are proposing that the competencies be reviewed in five years time with the option to review earlier if needed. Do you agree?
Yes
Comments: Please read my letter, dated 12 February 2016, on the page following this.

The public consultation paper on proposed entry level competencies for dental specialties by the Dental Board and Dental Council is welcome,

My postgraduate orthodontic training was in the UK in the early'70's (D.Orth.R.C.S. and MSc. London). I presented my certificates for registration in Sydney in 1977. Only my dental degree was accepted for registration. (Since then, there are a number of orthodontists who have registered these qualifications in Australia and New Zealand). I have been in fulltime specialist practice in South Africa.

I write as a disillusioned applicant for specialist registration in Australia where my children and grandchildren reside. This process commenced in 2012. My application has been before the Victorian Registration and Notification Committee 7 times. I have been "assessed" by the ADC Special Advisory Panel in Orthodontics twice. I will not comment on their conduct here. AHPRA advised me that I could apply for registration in New Zealand, advice also given by many colleagues.

At the core of the conflict is the rigid adherence to Section 58(b) of the National Law.

Section 58(b) seeks to establish equivalence between an overseas orthodontic training and that of a current Australian degree. This makes good sense if the comparison is being made between recent graduates from overseas and their Australian counterparts. Like is being compared with like. Orthodontic treatment by its nature is of much longer duration than most treatments in the other branches of dentistry. In addition, many orthodontic patients are growing. As a result, recently graduated orthodontists may be well trained over a period of 3 years, but they are all short on experience. I am not in that category.

No Australian academic will concur that training 40 years ago is equivalent to that available now, no matter how strong a case I can present. It is inconceivable that I am judged on the comparison of qualifications forty years apart. The many conferences and courses I have attended, the research and lectures I have presented, count for nothing. All this matters not in the eyes of the Committee who insist on applying Section 58(b).

According to the Dental Board, it is this same Victorian Committee who make the final decision. "If a chosen truth is faulty, inappropriate behaviour will result"

The Committee's chosen truth is Section 58(b).

The Committee has repeatedly avoided Section 58(c) of the National Law. This provides for an assessment which should be similar to the process followed in New Zealand.

Among the requirements of the Dental Council are documentary evidence of a selection of treated cases (three sets), recent CPD records and character references. None of which are required by the Dental Board. Are these, together with evidence of research, lectures given, papers published, courses and conferences attended, not more relevant than the dogmatic insistence on Section 58(b)? It must be obvious that the Board could implement the legislation which does exist in Australia.

To quote: "The Board assessment framework with the proposed competencies at its core will increase transparency for applicants and lead to greater efficiency in the assessment of specialist applications". Does this indicate the Board will adopt or adapt the assessment procedure which is implemented by the Dental Council in New Zealand? "Improved efficiency and transparency in the assessment of overseas trained dental specialists may contribute to the dental specialist workforce". That is all very logical.

However, in the light of my experience which I can confirm with ample evidence, the Dental Board of Australia should be ever mindful of the behaviour of those who are delegated to implement "all possible registration pathways under the National Law".

Robert Knights-Rayson.