

The Centre for Oral Health Strategy, NSW

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COHS response to Dental Board of Australia Draft Registration Standards

In December 2010 the Dental Board of Australia released draft Registration Standards and invited jurisdictions to comment.

The comments below are from the Centre for Oral Health Strategy, NSW

The draft Registration Standards are:

1. Draft registration standard for general registration of practitioners with qualifications substantially equivalent to approved qualifications
2. **Draft registration standards for limited registration**
 - a. **Postgraduate training or supervised practice (e.g. for employment in a Public Sector Dental Workforce Scheme or to undertake the Australian Dental Council exam)**
 - b. **Public interest**
 - c. **Teaching or research**
3. Draft guidelines on supervision (for limited registration)

Comments

2. Limited registration

(a) Postgraduate training or supervised practice

Supervised Practice

It may be worth emphasising that the two options in pathway A - supervised practice – are mutually exclusive.

In other words, under option 1, the primary purpose of employment is for the dentist to provide services to public patients. A public sector employer therefore has no obligation to prepare a candidate for the ADC final examination. Conversely, a dentist employed under option 1 should not expect to be exposed only to clinical experiences relevant to the ADC final examinations.

Under option 2 - a clinical training or assessment program – providing services to public sector patients would be to gain clinical experience relevant to the ADC final examination.

Postgraduate Training

Paragraphs 7 and 8 that are currently in the section dealing with “Pathway B – Postgraduate Training” would be better placed in the section dealing with pathway A – Supervised Practice, since they deal with the issue of a dentist with an overseas

qualification obtaining an Australian qualification that is required for full registration in Australia.

The definition of an approved postgraduate program of study is limited to qualifications leading to registration as a dental specialist. The issue is clouded however by reference to “dental practitioners” and the minimum qualifications required by dental prosthetists, oral health therapists, dental hygienists, and dental therapists.

While such practitioners may undertake postgraduate study (and indeed there is a list of add on programs of study recognised by the Dental Board of Australia), it can be argued that these courses are not **required** for registration in the same way that a postgraduate qualification is required by a dentist in order to be registered as a specialist.

It is recommended therefore that the references to other types of dental practitioners are excluded from the Postgraduate Training section.

The focus of the Registration Standard should be on the entry-level qualifications required for registration in the particular dental profession – specialist, dentist, dental prosthetist, oral health therapist, dental hygienist, and dental therapist.

(b) In the public interest

The heart of the matter here is that registration is one-off, for a particular purpose, and for a limited time of no more than three months.

It should be clearly distinguished from Limited registration for teaching and research, and should be used even when the purpose of the visit to Australia is to teach or participate in research activities.

Perhaps the key point is that the overseas-qualified dental practitioner is not an employee of an Australian institution. On the other hand, such a visitor is likely to have a contract for services from an Australian institution.

(c) Teaching or research

To avoid this category being exploited by a loose interpretation or “research” or “teaching”, the Dental Board of Australia may wish to add that either activity has to be the sole employment of the applicant and that the employing agency must be a Registered Training Organisation in the case of a training/education role, or a recognised research facility.

This approach leaves open the possibility of employment in the private sector (eg a research laboratory in the dental industry) as well as in public facilities.

Under “purpose of registration” *it is noted that “a dental practitioner registered under this category will not be eligible to undertake private practice”.*

Probably this would be interpreted as meaning the practitioner is not permitted to provide dental treatment to individual private sector patients. By mentioning “private practice” however, there may be an assumption that the practitioner **may** provide

services to public patients – perhaps through a joint appointment to public sector oral health services.

This assumption however runs counter to the previous statement that “*registration is granted for the particular purpose which is the teaching or research position*”.

If this statement above is accepted as the heart of limited registration in this category, then both public and private practice should be prohibited, except in so far as particular dental practices may be carried out in either the public or the private sector as a demonstration while teaching or collecting clinical data in a research role.

A sentence might be include that says

A dental practitioner with Limited registration – Teaching and Research cannot receive additional remuneration for oral health services he or she provides in the course of teaching or research, and certainly cannot be employed to provide such services outside of their teaching or research functions.

The permitted practices could be written into the public register.

The statement used in relation to Limited registration in the public interest might be used for consistency:

*The terms of the Limited registration will be notated on the Register of Dental Practitioners and any practice outside of thee terms is **not permitted**.*

If suggestions for creating a greater consistency in the three categories of Limited registration were adopted, the Board might consider whether the categories might be collapsed into **one** category, and the terms of Limited registration recorded in the Register.

The Board may also wish to discuss the scheduling of ADC Final Examinations with the Australian Dental Council so that registrants who have one or three years to complete the registration process do not miss out because of a shortage of examination places.

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17 January 2011