

Executive Officer
National Board of Australia
AHPRA
GPO Box 9958
Melbourne 3001



Dear Sir/Madam,


I am writing to express concerns over the proposed changes to the scope of practice by the Dental Board of Australia. My greatest concern is that the relaxing of the required standards for supervision by the dentist by dental hygienists and therapists will lead to major compromise in patient safety. I would draw a comparison to many cases that I have seen recently where patients go overseas to see practitioners in third world countries and then come back here with irreversible problems to their teeth or surrounding structures. I have also heard of cases of patients dying from infections following surgery done overseas. Whilst the practitioner may have had the best of intentions, a lack in the length of training is responsible for lack of care. The current requirements for supervision by the dentist are well balanced and sensible. Changes like the ones proposed at present will cause problems with patient care and adversely affect the image of the government agencies responsible for making the changes.

A second problem which I see is the restrictive definition being applied to the scope of practice for a dentist. A dentist's degree provides a core skill set which allows further evaluation and integration of additional skills. Whilst there is the potential for dentists in big cities to refer patients to specialists or other health professionals, I predict this change will impact most heavily on rural and remote communities where there is a lack of health services. The current guidelines allow a dentist in a remote area to increase his skill set through continuing education and apply these skills in meeting the needs of patients in these areas for whom travel to the big cities is difficult.

I would also see no need in making changes to "support the team approach to dental care". There is no need to make this change as the team approach to dental care was a key part of the training during the dental degree and is a very important factor which is currently applied in the performance of dentistry.

I would urge you to see the misgivings of these proposed changes and make recommendations to reject the changes,

Yours Sincerely,


Dr Andrew Culwick
(Dentist)