

Comments on Registration Standards for Dental Board of Australia

The following comments are provided on the Consultation Draft on Registration Standards from the viewpoint of the Director of the Australian Research Centre for Population Oral Health (ARCPOH) at the University of Adelaide.

ARCPOH is an internationally recognised centre for population oral health and thus attracts staff and students from around the world. Section 66 and Section 69 have implications for training and research programs at ARCPOH.

The only clinical work undertaken by dental practitioners employed or studying at ARPOH would be oral epidemiological examinations and/or clinical trials of applications of non-surgical interventions such as applications of fluoride varnish, chlorhexidine varnish and silver fluoride (or silver diamine fluoride). For each study ARCPOH runs training and calibration programs of between eight and 15 hours, which are then followed by testing against a gold standard examiner in the field as is normal oral epidemiological practice.

The issue of concern to ARCPOH in the Draft Regulations relates to Section 66, Pathway B Postgraduate training Requirement 6 and to Section 69 Requirement 3. Many of our oral epidemiologists and PhD students are overseas trained dental practitioners whose practice of dentistry is confined to research in the areas listed above. They have been practising dentistry through research in oral epidemiology or public dental health for some time, but have not been practising 'clinical dentistry' (although this does not seem to be defined).

Section 66, Pathway B, Requirement 6 and Section 69, Requirement 3 both refer to 'clinical practice' and this requirement would not be met by many ARCPOH staff and students and its implementation would severely limit the research capability of ARCPOH. The removal of the word 'clinical' from the above requirements would address any concerns ARCPOH has and it would bring the requirements for overseas trained practitioners in line with the definition of 'practice' used elsewhere in the AHPRA documentation.

If the word 'clinical' must be retained (not our preferred option) and clinical dentistry included epidemiological examinations and clinical trials for non-surgical interventions, then the requirement of 250 hours per year for 3 years is unrealistic (Section 69 Requirement 3). A more realistic requirement for the type of work that ARCPOH undertakes would be 30 hours.

Thank you for consideration of this submission

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