

**From:** Gavin Lenz  
**To:** [dentalboardconsultation](#)  
**Subject:** Scope of Practice Public Consultation  
**Date:** Friday, 11 May 2018 2:48:41 PM

---

May 11th 2018

Dr John Lockwood  
Chairman, Dental Board of Australia

Re: Scope of Practice Public Consultation

I am an orthodontist and write to express my concern over the Dental Board's proposed changes to the Scope of Practice Registration Standard. These proposed changes pose a significant risk to patients welfare. Any changes to the scope of practice must also consider the legal limits to practice and the minimum competency set of all dental practitioners.

I support the positions of the Australian Dental Association and the Australian Society of Orthodontists. In particular I have grave concerns about the new reflective tool for self-assessing ones competency or level of training. Many CPD courses are offered by companies selling products – their main goal is to sell their product which is not necessarily in the public's best interests. A general dentist does not have the training to understand the problems with some of the claims made by companies selling these appliances and techniques and simply start using them as instructed. Only a specialist has the level of training and knowledge to recognise any flaws or limitations.

I have seen an increasing number of patients for opinions who have had inappropriate orthodontic treatment undertaken by general dentists recently. This was quite rare when I first started practicing as an orthodontist 20 years ago. These patients often have been through significant discomfort and financial cost that has often gone on for many years only to then be told by me that we have to start again because the diagnosis was incorrect and the subsequent treatment therefore not appropriate. This is being noticed by many orthodontists across Australia.

One of my orthodontic colleagues has highlighted that dentistry many years ago was an apprenticeship and society required it become a University based degree to provide better training and safer care for the public. The changes that have been suggested the the Scope of Practice seem to be progressively going backwards to a lower standard of training and care which places the public at a higher physical and financial risk. If anything the Scope of Practice standard should be increased so that dentists are not permitted to undertake treatment that they are not adequately trained to do.

A general dentist does not have the specialist training that an orthodontist does and is generally unable to determine what appropriate or inappropriate training is. The purpose of attending University based programs is to give the training to understand what is suitable and what is potentially harmful rather than learning by trial and error as with many of the GP-directed CPD courses. I therefore support

maintaining the status quo (Option One) as laid out in the consultation and also suggest stronger review of CPD as many courses are unsuitable and simply revenue raising for companies selling products of dubious or even dangerous efficacy.

Sincerely,

Gavin Lenz  
Orthodontist  
Platinum Orthodontics  
429 Ipswich Road  
Annerley Qld 4103  
