



THE UNIVERSITY OF
MELBOURNE

15th March 2011

The Executive Officer
Dental Board of Australia
GPO Box 9958
Melbourne, Victoria 3001

Dear Sir/Madam

Re: Registration standards: Consultation drafts

Thank you for the opportunity to offer comment on the proposed Registration Standards and guidelines below.

Section 66 – Limited registration for postgraduate training or supervised practice

Section 68 – Limited registration in Public interest

Section 69 – Limited registration for teaching or research

and

Proposed Guidelines on Supervision (for Limited registration)

My comments are set out below.

In general, I am supportive of the direction of the Registration Standards. However there are two aspects which appear, potentially, to be detrimental to contemporary dental education in Australia. In summary, both appear to threaten the independence of universities as dental educational decision makers.

1. Section 66 – Limited registration for postgraduate training or supervised practice.

I have no difficulty with the supervisory requirements set out in the accompanying document (Proposed Guidelines on Supervision (for Limited registration)). However the standard itself appears to be taking responsibility of who should be offered post-graduate education away from the educational institution and bestowing it on the DBA. As an example, the Melbourne Dental School has had four students (who have been accepted into post-graduate programs by The University of Melbourne), questioned and possibly soon to be rejected by the DBA. The reasons for this action by the DBA/AHPRA offered appear to revolve around English competency. For an independent post-graduate educational institution this is unacceptable practice. It seems unreasonable to interfere with the university post-graduate selection processes (particularly given the stringent supervisory arrangements outlined by the DBA).

2. Section 69 – Limited registration for teaching or research.

The areas of concern I have with this is not the Standard per se, although I find it rather complex. The issue relates to the Supervision Plan outlined in the Proposed Guidelines on Supervision (for Limited registration). The extent of supervision and frequency of reporting are excessive, the more so for academics with minimal or no risk for the public, or individuals who will be either and who are therefore covered by the standard. The

Guidelines require supervision of teaching or researching (or both) registrants to have a 3 monthly *including at renewal* plan and report provided for and on them. I would argue that there no need at all to require either a plan or a report and how either would be used is unclear. There appears to be no benefit to the individual, the institution or the community for whom protection is being sought. To highlight the difficulties that such requirements would present, two of the Deans of Dental Schools around Australia (one previous and one current) who are considered international leaders in their fields of research and education would be subject to these requirements. At the Melbourne Dental School, there are several academic and research staff with dental qualifications who have been recruited from the international scene who would also be subject to these excessive demands for registration. All of these individuals provide excellent service to the educational programs within Australia and we would be poorer for their loss. Australia is suffering from a shortage of appropriately qualified teachers and researchers already. Recruitment is, and has also been, undertaken at the international level. Australian universities compete with institutions around the world for expertise. To place such ignominious and unnecessary restrictions on potential international well respected applicants will not encourage them to see Australia as a viable place to seek employment. It will clearly be counter-productive to sound dental education in this country and, if schools have difficulty recruiting adequate numbers of educationalists and researchers, also potentially counter to improving community access to oral health care providers.

Yours faithfully



MIKE MORGAN

Acting Head, Melbourne Dental School