



AUSTRALIAN DENTAL
ASSOCIATION INC.

Submission to the Australian Health Practitioner Regulation Agency and Dental Board of Australia's Registration Standard: Consultation Draft for Section 53(b)

February 2011

Authorised by:

Dr F. Shane Fryer
Federal President

Australian Dental Association Inc.
14-16 Chandos St
St Leonards NSW 2065
PO Box 520
St Leonards NSW 1590

T: 02 9906 4412
F: 02 9906 4917
E: adainc@ada.org.au
W: www.ada.org.au

General

The Australian Dental Association Inc. thanks you for the opportunity to comment upon the Australian Health Practitioner Regulation Agency (AHPRA) and Dental Board of Australia's (DBA) Registration Standard: Consultation Draft for Section 53(b).

Background

The Australian Dental Association Inc. (ADA) is the peak national professional body representing about 10,000 registered dentists engaged in clinical practice. ADA members work in both the public and private sectors. The ADA represents the vast majority of dental care providers in Australia.

The primary objectives of the ADA are:

- to encourage the improvement of the oral and general health of the public and to advance and promote the ethics, art and science of dentistry, and
- to support members of the Association in enhancing their ability to provide safe, high quality professional oral health care.

There are Branches in all States and Territories other than in the ACT, with individual dentists belonging to both their home Branch and the national body. Further information on the activities of the ADA and its Branches can be found at www.ada.org.au.

ADA's response to the consultation draft

Currently, overseas dental graduates become eligible to register with AHPRA to allow them to practise in Australia through either:

- i) The graduate successfully completing the Australian Dental Council's (ADC) Examination process; or
- ii) Trans-Tasman Mutual Recognition Arrangement (TTMRA) where individuals registered or licensed to practise an occupation in New Zealand are entitled to practise the equivalent occupation in any Australian State and Territory, and vice versa. The TTMRA applies irrespective of where training was undertaken; or
- iii) Through eligibility granted to graduates of some overseas dental schools.

Dentistry involves invasive irreversible surgical procedures. Measures should be in place to ensure that Approved Qualifications from Overseas Jurisdictions continue to meet the standards that have been developed within Australian dental schools and are consistent with the level of achievement that the ADC has recognised as necessary for an overseas graduate to practise within Australia. No reduction in skill levels can or should be permitted. Australian dentists have a high level of training, skill and knowledge and these must not be compromised.



AUSTRALIAN DENTAL
ASSOCIATION INC.

There is an existing high failure rate by candidates of the ADC examinations. This indicates that the dental clinical standards of many overseas-trained dentists are not up to those required in Australia and that the DBA needs to seek expert advice before increasing the number of overseas dental schools whose graduates are granted eligibility to practise in Australia.

The ADC has acquired a sound knowledge of the level of knowledge and skill that has been acquired by graduates from many overseas dental schools. Therefore, it has a significant awareness of the standard of the qualifications obtained from many overseas jurisdictions. The ADA feels that the ADC would be able to provide AHPRA and the DBA with sound knowledge and advice as to the suitability of the List of Approved qualifications from Overseas Jurisdictions.

Accordingly, if the List was prepared by AHPRA heeding advice from the ADC, both with respect to additions or exclusions from the existing List so that it ensures maintenance of the levels of qualification that currently exist, then the ADA would be prepared to accept the List as created.

With the introduction of the List and the University of Otago, New Zealand being specifically included, AHPRA should remove the TTRMA. Retention of this could open the door to overseas practitioners, with standards lower than those required by the ADC, obtaining eligibility to practise.

It is noted that the List will be reviewed by the DBA on a "regular basis". The ADA endorses this and believes that such review must be conducted periodically utilising the services of the ADC through the occasional testing of graduates from schools listed. In addition it is felt that not only should the review consider the addition of other suitable Dental Schools to the list but those schools listed should periodically undergo a form of assessment to ensure that graduates of those schools attain the level of skill required of an Australian practitioner. The ADA requests that it be consulted whenever the List is reviewed.

Conclusion

Thank you for the opportunity to comment on this important area.

The advice of the ADC should be sought and heeded on the suitability of the List of Approved qualifications from Overseas Jurisdictions, and the ADA should be consulted whenever the List is reviewed.

I look forward to your response.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'F. Fryer', is positioned below the text 'Yours sincerely'.

Dr F. Shane Fryer
Federal President