

From: Dr Katy Theodore
To: [dentalboardconsultation](#)
Subject: DBA Scope of Practice Submission
Date: Monday, 14 May 2018 5:32:39 PM

To Dr John Lockwood
Chairman, Dental Board of Australia

Re: Scope of Practice Public Consultation

Thank you for the opportunity to provide feedback on the proposed revised Scope of Practice registration standard and Guidelines for Scope of Practice.

I strongly support the proposed changes to the Scope of Practice registration standard and Guidelines for Scope of Practice set out in Option 2 of the Consultation paper.

1. From your perspective, how is the current registration standard and guidelines working?

Satisfactorily.

1. Are there any issues that have arisen from applying the existing registration standard and guidelines?

The requirements for a 'structured professional relationship' that prevents dental hygienists, dental therapists and oral health therapists from practicing independently has created some limitations, predominantly based on poor understanding of their existing scope of practice. I consider them to be an unnecessary over-regulation as all dental practitioners are subject to the same responsibilities, they therefore, should be regulated equally within the legislative framework.

1. Is the content and structure of the proposed revised registration standard and guidelines helpful, clear, relevant and more workable than the current registration standard and guidelines?

It is appropriate that with the removal of the requirements of independent practitioners there is also the removal of the requirement for a structured professional relationship (SPR) with greater reference to the Code of Conduct, which I believe better captures the fundamental principles and intentions of the SPR. The Code of Conduct provides greater clarity and certainty to all dental practitioners, as it more aptly describes the expected way of working, including the recognition of the importance of the team-based approach, collaborative oral health care, patient engagement and communication.

1. Is there any content that could be changed or deleted in the proposed revised registration standard and guidelines?

I am satisfied with the proposed revised registration standard and guidelines and do not identify areas for change.

1. Do you think that a review period of at least every five years (rather than three) is appropriate? Why or why not?

I have no preference for the review period on the registration standard and guidelines.

1. Do you have any other comments on the proposed revised registration standard and guidelines?

The revisions of the proposed registration standard reflect a suitably risk-based approach to the registration standards. This approach has effectively recognised the professional roles and responsibilities of all dental practitioners and the requirements for their regulation. The consultation paper identifies the components of the regulatory framework of the profession that support the proposed changes. Emphasis is correctly on the professional education, training and competence of the individual practitioner through programs evaluated against the accreditation standards of the Australian Dental Council and approved by the Board. Following registration, the requirements of professional practice are set out in the Board's registration standards and supported by the Code of Conduct, which covers all the elements of safety including professional relationships and the expected ways of working.

1. Is the content and structure of the new reflective tool helpful, clear and relevant?

Individual and group reflection within a supportive and respectful workplace environment is a good method of establishing specific competencies which can then further inform professional relationships with a collective commitment to patient safety. The proposed self-reflection tool for scope of practice will provide an opportunity for all practitioners to assess their current skills, knowledge and competencies to inform their practice and on-going education and training requirements. A reflective tool is consistent with safety and quality frameworks and the dental profession's increasing focus on multidisciplinary, team-based and patient-centred care.

8. Is there anything missing that needs to be added to the new reflective tool?

No further comment.

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Member of the ADA – who do not accurately represent my views on this matter.