7th May 2018

Dental Board of Australia
Australian Health Practitioner Regulation Agency
GPO Box 9958 Melbourne Vic 3001
dentalboardconsultation@ahpra.gov.au

ANZAP feedback on the Dental Board of Australia’s proposed changes to Scope of practice registration and Guidelines for scope of practice.

The Australian and New Zealand Academy of Periodontists (ANZAP) appreciates the opportunity to provide feedback relating to the Dental Board of Australia’s proposed changes to Scope of practice registration and Guidelines for scope of practice. We write on behalf of the ANZAP Council, ANZAP being the peak body representing Periodontists in Australia and New Zealand. It is our grave concern that the proposed changes are not in the best interest of the community.

The change to remove the requirement for a ‘Structured Professional Relationship’ is a perplexing one. Oral health care is provided by a range of oral health professionals but there are fundamental differences in the different providers. These relate to differences in education and qualifications. These differences cannot be overcome by ongoing CPD. Maintaining the existing structured professional relationship is in the best interest of the patient. It is very difficult for patients to appreciate and understand the range of different oral health practitioners and the services that they offer. For this reason, therapists, hygienists and oral health therapists need to maintain an involvement with a dentist. This team approach has worked well and there is no reason for a change to this structure. Independent practice will not compensate for a lack of access to oral health care, nor will it affect the cost of providing oral health care. Any change to the existing format should only be considered if it can offer an advantage to the patient in terms of the delivery of service or if it will offer a higher standard of care. Independent practice can promise neither advantage.

Another area of concern is CPD. The board proposes to remove reference to Programs to extend scope and also to remove the prescriptive terminology around education, training and competence. As the onus is on the dental professional to be suitably qualified to perform a particular procedure or manage a particular disease or condition, then adequate CPD is crucial. CPD is not regulated and there are a myriad of advertised courses, often provided by companies with a vested interest in selling a product,
Yours Sincerely

Dr Rachel Garraway  BDSc (Hons)  MDSc  MRACDS (Perio)  FICD  FADI
ANZAP President

Dr David Drew  BDS (Adel), MDSc (Perio)
ANZAP Vice President