

**From:** [REDACTED]  
**To:** [dentalboardconsultation](#)  
**Subject:** RE: Scope of Practice  
**Date:** Monday, 17 June 2013 1:51:12 PM

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Dear Sir/Madam

The National Board has proposed key changes to the Scope of practice registration standard. I write to express my concern with a number of proposed changes.

It has been stated these changes are to 'support the team approach to dental care', yet with the removal of supervision requirements as recognition - the result of this will only fracture existing teams, and will not foster the formation of teams.

Recognition of the team approach has always been given, and removing supervision requirements is not an appropriate manner by which this can be achieved. It is irresponsible and akin to removing the position of coxswain from a rowing team and having each rower choose their own pace. The result is, as one can imagine, where the team leaves to row individually - not as a team.

In the proposal, it has been suggested to 'reduce the prescriptive nature of the standard' - these very words ignore that dentistry is a form of health care. It is *not* primarily a production line - we are here to treat patients to the best of our abilities, with the *support* of dental auxiliaries.

The last relevant part of the proposal was to 'provide further clarification on the standard' - in what way has the proposal done this? It has only served to muddy the waters with ill-defined roles and then telling the Australian public that any of these dental practitioners may treat them.

For the most part, there is not an access to care issue in Australia - there is a care to access issue. These proposals will not achieve anything other than to increase the number of individual practitioners in the metropolitan areas who have wildly differing levels of skill and breadth of capability, and increase confusion amongst the Australian public as to who is capable of which treatments.

I emphatically argue that the Dental Board of Australia should reject the proposed changes.

Regards,

Dr Katherine Chan