



Australian  
Dental  
Council

---

## **SUBMISSION**

to

**Dental Board of Australia**

on

**PROPOSED REGISTRATION STANDARD: SECTION 53(b)  
General Registration for Dental Practitioners with Qualifications  
Substantially Equivalent to Approved Qualifications**

25 February 2011

## 1. Introduction

- 1.1 The Australian Dental Council [**ADC**] appreciates the invitation of the Dental Board of Australia [the **Board**] to comment on the Board's proposed registration standard under section 53(b) of the *Health Practitioner Regulation National Law Act 2009* [the **National Law**] covering general registration for dental practitioners with qualifications substantially equivalent to approved qualifications.
- 1.2 The consultation draft indicates that the purpose of the proposed registration standard is to:  
*provide a pathway to general registration for overseas qualified dental practitioners who have a qualification from the Board's published List of Approved Qualifications from Overseas Jurisdictions. These approved qualifications are those which the Board considers to be substantially equivalent to a qualification for general registration under section 53(b) of the National Law.*
- 1.3 The ADC makes this submission as the external accreditation authority that has been assigned by the Ministerial Council to undertake the accreditation functions for the Dental Board of Australia under the National Law. The accreditation function reference in the National Law that is particularly relevant to this registration standard is under s.42:  
*(c) assessing authorities in other countries who conduct examinations for registration in a health profession, or accredit programs of study relevant to registration in a health profession, to decide whether persons who successfully complete the examinations or programs of study conducted or accredited by the authorities have the knowledge, clinical skills and professional attributes necessary to practise the profession in Australia;*

## 2. Comments on Specific 'Requirements' Under the Proposed Standard

### Eligibility for General Registration:

- 2.1 The ADC supports the proposal that all requirements for general registration as a dental practitioner under the National Law must be satisfied for s.53(b) general registration.

### Eligibility for registration as a dental practitioner in the relevant overseas jurisdiction in which the qualification was obtained:

- 2.2 The ADC supports the proposal that for s.53(b) general registration overseas qualified dental practitioners must also complete any examination or any other prerequisites required for registration in the relevant overseas jurisdiction in which the overseas qualification was obtained.

### An approved qualification from an overseas jurisdiction

- 2.3 The focus of the submission by the ADC is on the *List of Approved Qualifications from Overseas Jurisdictions*.
- 2.4 The ADC notes that the *List of Approved Qualifications* is not part of the registration standard but is referenced in the standard and may be amended from time to time following relevant consultation. The ADC further notes that the only reference to criteria for inclusion in this *List* is the following statement in the Introduction to the Consultation Draft: *'the specific qualifications listed at point 1 (from UK and Ireland) reflect the qualifications that were approved by State and Territory Boards prior to 1 July 2010'*.
- 2.5 The ADC can appreciate the need for the inclusion of these qualifications as part of the transition to and start-up of the National Scheme. However, this approach can appear to give rise to some anomalies in the *List* since it represents a list constructed at a certain point in time. For instance, the listing under (1) in the Consultation Draft (p3) includes the Bachelor of Dental Surgery (BDS) granted by the University of Wales. The University of Wales College of Medicine has merged with Cardiff University and is now known as the Cardiff University School of Dentistry, and the BDS is awarded by

Cardiff University, not the University of Wales. In this instance, the listing of this qualification is historically correct but no longer currently accurate.

2.6 Similarly, the *List* appears to include Schools/Universities that are not included currently in the General Dental Council website listing of accredited programs/qualifications (<http://www.gdc-uk.org/Dentalprofessionals/Education/Pages/Dentist-qualifications.aspx>), eg University of St Andrews appears no longer to offer a dentistry program. There are also several more new Schools that will have their first cohort of graduates in 2011/2012. There are no references to them, and this might be appropriate to do in order to provide a more 'complete' List for the purpose.

2.7 The ADC suggests that for the longer term a more appropriate and desirable approach by the Board is the application of s.53(b) in conjunction with s.42(c) of the National Law. This is essentially the process followed by the ADC in relation to the Canadian qualifications that are included under (3) on the *List*, which reads as follows:

3. *Degrees of Doctor of Dental Surgery (DDS) or Doctor of Dental Medicine (DMD) in general dentistry awarded on or after 31 March 2010 by universities in Canada (accredited by the Commission on Dental Accreditation of Canada).*

2.8 In this instance, inclusion on the *List* is the result of the completion of a mutual recognition agreement between the ADC and the Commission on Dental Accreditation of Canada [CDAC]. This Agreement between the ADC and the CDAC provides for reciprocal recognition of accreditation of programs in general dentistry. The Agreement became effective on 31 March 2010. (A copy of the Agreement has previously been forwarded to the Board; a further copy can be provided, if required.) The signing of the Agreement followed discussions over a number of years culminating in reciprocal visits in 2009 between the ADC and the CDAC to observe the accreditation processes and decision making of each body. Reports of these visits to each organisation confirmed the following:

- the CDAC and ADC operate as independent national accreditation authorities in their respective countries;
- the CDAC and ADC have accreditation standards, processes and outcomes that mirror each other;
- the CDAC and ADC have committee processes and governance and decision making operations which, whilst they differ in format, are comparable in their rigour and attention to fairness and equity in applying accreditation standards.

Accordingly, and given the similarity of health systems, education systems and dental education curricula, reciprocal recognition of accreditation outcomes was seen as appropriate.

2.9 The effect of the Reciprocity Agreement between the ADC and the CDAC is that any student who successfully completes and graduates from an accredited general dentistry program whose accreditation is recognised pursuant to the Agreement will be recognised by the ADC and the CDAC as a graduate of an accredited program included within the Agreement. The ADC will therefore recognise graduates of CDAC-accredited programs in Canada in the same way as it recognises graduates of ADC-accredited programs in Australia. The Agreement came into effect on 31 March 2010 and is not retrospective.

2.10 The processes and outcomes in paragraphs 2.8-2.9 above essentially describe the criteria and processes that satisfy s.42(c) of the National Law to determine whether persons who successfully complete general dentistry programs of study offered by Canadian education providers accredited by the CDAC have the knowledge, clinical skills and professional attributes necessary to practise general dentistry in Australia. This enabled the Board pursuant to s.53(b) of the National Law to determine that graduates of these programs hold a qualification that is substantially equivalent to an approved qualification in Australia. In the particular example of Canada, to be eligible for licensing as a general dentist in Canada graduates of CDAC-accredited dental programs are required also to successfully complete the examinations of the National Dental Examining Board of Canada. Hence, the Dental Board of Australia *List* specifies the additional requirement for graduates of CDAC-accredited

programs to have successfully completed the Canadian national certification examination in order to be eligible for registration in Australia, *ie* these Canadian graduates are eligible for registration in Australia on the same basis as in Canada, and without further examination in Australia.

- 2.11 As commented above, the ADC can understand the approach adopted by the Board in the proposed Registration Standard in relation to qualifications from universities in the United Kingdom and Ireland, as a transition or start-up measure. However, the ADC suggests that the pathway by which the Canadian qualifications that are also listed came to be accepted by the Board, *viz* rigorous assessment by the ADC (and equivalent by the CDAC) to confirm the acceptability of the independent national accreditation standards and process for these qualifications, should be the Board's objective for the future. The ADC indicates its preparedness, with appropriate resourcing, to assist the Board in this regard, in initiating a similar measured approach to recognition (desirably mutual recognition but unilateral where this is not feasible) of accreditation authorities and their processes and outcomes in other appropriate countries, particularly the UK and Ireland. The ADC encourages the Board to include in the Registration Standard or the related *List of Approved Qualifications from Overseas Jurisdictions* a reference to signal its intention to introduce equivalent pathways and processes for any addition to or revision of the *List*.

Australian Dental Council  
East Melbourne, Vic

25 February 2011



## Contact

*For further information please contact:*

Dr Robert Broadbent  
Chief Executive Officer  
Australian Dental Council  
Tel: (03) 9657 1777  
Fax: (03) 9657 1766  
e-mail: [ceo@adc.org.au](mailto:ceo@adc.org.au)