

4 March 2011

Dr John Lockwood
Chair
Dental Board of Australia
GPO Box 9958
MELBOURNE VIC 3001

Dear John

Re: REGISTRATION STANDARD

Section 53(b) General registration for dental practitioners with qualifications substantially equivalent to approved qualifications

Dental Health Services Victoria (DHSV) appreciates the invitation of the Dental Board of Australia (DBA) to comment on the proposed registration standard under section 53(b) of the *Health Practitioner Regulation National Law Act 2009*, and for agreeing to extend the submission date for responses to Friday 4 March 2011.

DHSV, as the lead public oral health agency in Victoria, provides this response considering the objectives of the Board as described in the Act and also after considering the alignment with the DHSV Strategic Goals. The significant issue for DHSV is that there is adequate consideration by the DBA of the access and workforce objectives as well as protecting the public.

REQUIREMENTS

1. Eligibility for general registration

DHSV supports the proposal that all requirements for general registration as a dental practitioner under the National Law must be satisfied.

2. An approved qualification from an overseas jurisdiction

The focus of this requirement is on the published *List of Approved Qualifications from Overseas Jurisdictions*, which, whilst not part of the registration standard, it is referenced and the DBA has invited comments from interested stakeholders on the content of the list.

We believe that the *List of Approved Qualifications from Overseas Jurisdictions*, particularly as provided for the United Kingdom and Republic of Ireland, is not a contemporary approach and is difficult to ensure it is current and accurate as Universities change their course provisions. The list described in the draft supports that point as there are universities listed that do not provide entry-level dentistry courses as well as Universities listed that no longer provide courses.

DHSV suggests that the list of Universities from the United Kingdom and Republic of Ireland could be substituted with a paragraph stating 'Qualifications in general dentistry from Universities in the United Kingdom and Republic of Ireland accredited by the General Dental Councils of the United Kingdom and Ireland.'

DHSV supports the competent authority approach for identifying approved qualifications similar to that described for Canada. The *List of Approved Qualifications from Overseas Jurisdictions*, pertaining to recent graduates from universities in Canada, is aligned with a competent authority model which looks at equivalency of process of accreditation of programs rather than assessment of the individual university. It is our understanding that the inclusion of this category on the list is the result of a mutual recognition agreement between the Australian Dental Council (ADC) and the Commission on Dental Accreditation of Canada (CDAC) that provides for reciprocal recognition of accreditation of programs in general dentistry.

DHSV would support a similar accreditation process of the competent authority processes for approval of programs within other jurisdictions such as Singapore and Hong Kong.

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

DHSV would only support the proposal that dental practitioners must also complete an examination or any other prerequisites required for registration in the relevant overseas jurisdiction if there was evidence that this protected the public. Additional examinations or other prerequisites to successfully completing an accredited course is another barrier to entry and therefore can reduce access. From a policy perspective, safety of the public is provided by accrediting courses or by registration (Board) exams. There is no need for both safety controls. Some jurisdictions use the exams to limit the number of practitioners for economic reasons. The DBA has a function that requires it to consider access and at a time of insufficient workforce should carefully consider not introducing further barriers to entry.

Please do not hesitate to contact me should you require further input.

Yours sincerely

A handwritten signature in black ink, consisting of a large, stylized 'D' followed by a horizontal line extending to the right.

Deborah Cole
Chief Executive Officer