



6th June, 2013

Dental Board of Australia
GPO Box 9958
Melbourne Vic 3001
Email: dentalboardconsultation@ahpra.gov.au

Re: Draft *Scope of practice registration standard and guidelines*

The Australian and New Zealand Society of Paediatric Dentistry Inc (ANZSPD) is committed to the study and advancement of paediatric dentistry, and the promotion of education in the field of paediatric dentistry. Membership is open to all ethical dentists who share an interest in advancing the objectives of ANZSPD. As a result, ANZSPD has members who are general dental practitioners, specialist paediatric dentists and other dental specialists (for example, orthodontists). Dental auxiliaries (dental therapists, dental hygienists and oral health therapists) may become associates of ANZSPD. ANZSPD is affiliated with the Australian Dental Association.

Many members of ANZSPD have worked with dental auxiliaries in successful dental teams over long periods of time. These teams have been in both private practices and public dental care facilities. In all of these situations a dentist or a dental specialist has been the team leader or clinical supervisor. Therefore, ANZSPD is pleased to support many of the changes outlined under Option 2.

ANZSPD supports the following changes / additions to the Scope of practice registration standard:

1. “All dental practitioners are members of the dental team who work together within their particular areas of competence, to provide the best possible care for their patients.”
- 2a. “Dental hygienists, dental therapists and oral health therapists are members of the dental team. They practise in a range of activities included in the definition of dentistry in which they have been formally educated and trained. They may only practice within a structured professional relationship with a dentist. They must not practise as independent practitioners.”
- 2b. “Structured professional relationship means the arrangement established between a dentist and/or specialist dentist(s) or group of dentists, and a dental

hygienist, dental therapist, oral health therapist, and/or dental prosthetist to provide professional advice, in relation to the management of patients within their scope of practice. It provides the framework for the referral of patients from the dentist and/or specialist dentist to the dental hygienist, dental therapist, oral health therapist and/or dental prosthetists, and referral to the dentist and/or specialist dentist when the care required falls outside of the scope of practice of the dental hygienist, dental therapist, oral health therapist and/or dental prosthetist.”

2c. “Independent practitioner means a practitioner who may practise without a structured professional relationship.”

3. “Dentists and/or specialist dentists work as independent practitioners who may practise all parts of dentistry included in the definition of dentistry. Where there is a structured professional relationship or referral relationship then the dentist and/or specialist dentist is the clinical team leader.”

and

“Dental prosthetists are members of the dental team. They work as independent practitioners in a range of activities included in the definition of dentistry.”

4. The publication of a guidelines document that includes the following:

i. A description of the dental profession

ii. National Board approved programs which may extend a dental practitioner’s range of practice (for practitioners who were not taught these skills as part of their dental qualification)

ANZSPD agrees that:

1. the revision to the standard will provide greater clarity and certainty for dental practitioners to work within their scope of practice
2. the introduction of the guidelines further supports this clarity for dental practitioners and the public

ANZSPD only supports the management of patients requiring dental treatment under general anaesthesia by:

- dental specialists
- appropriately trained and experienced dentists who have demonstrated competency and who continue to perform a sufficient number of cases under general anaesthesia each year to maintain their competency.

The management of dental treatment under general anaesthesia by less qualified dental practitioners or by dentists who are unable to demonstrate on-going competency is not supported. ANZSPD suggests this additional factor should be included in the guidelines to support the standard.

ANZSPD is aware that in most States and Territories, dental hygienists, dental therapists and oral health therapists already have the legal authority to assess, diagnose and treatment plan patients on behalf of the team's dental clinical leader. ANZSPD does not accept that these dental auxiliaries have sufficient training to do so. It is ANZSPD's belief that assessment, diagnosis and treatment planning should be left to the dentist and/or specialist dentist who is the clinical team leader. The clinical team leader should then delegate appropriate treatment for the patient to the dental auxiliary.

ANZSPD does not support the extension of the scope of practice of dental therapists and oral health therapists to patients of any age, especially when these dental auxiliaries continue to have responsibility for assessment, diagnosis and treatment planning.

ANZSPD does not support the extraction of permanent teeth by dental auxiliaries under any circumstances. ANZSPD only supports the extraction of primary teeth by dental auxiliaries if they are mobile due to physiological root resorption. ANZSPD also supports the extraction of primary teeth by dental auxiliaries if the extraction has been treatment planned by the dental team leader.

ANZSPD does not believe there are any additional skills which the National Board should consider adding to the list of skills in the guidelines relating to programs to extend scope.

If ANZSPD's suggested modifications to the guidelines for dental auxiliaries and management of patients under general anaesthesia were made, ANZSPD believes the preferred proposal would balance the need to protect the public with the need to regulate the profession.

ANZSPD would welcome an opportunity to clarify or expand on any part of this submission if requested to do so by the Dental Board of Australia.

Yours sincerely,

John M Sheahan
Federal President
ANZSPD Inc