

**From:** [REDACTED]  
**To:** [dentalboardconsultation](#)  
**Subject:** Scope of Practice  
**Date:** Tuesday, 18 June 2013 4:55:41 PM

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Dear Sir Madam,

I write with some urgency in light of the limited time for submissions that may influence changes to the Act affecting the scope of practice of dental auxiliaries. I have only today become aware of what is proposed.

I have been a dentist for 15 years and have seen a regulatory attack on professional standards over this time. Much of this change is a result of the government trying to have an influence on a service that we provide for the public without government funding.

There is a perception that a cheaper alternative option for private fee paying dental patients is to offer a 'half dentist'. Hygienists and Therapists are for the most part well trained and capable, but they are not fully trained dentists. Enlarging their scope of practice without the full training and experience will put the public at risk of inferior and in some cases dangerous situations. It should be noted that the grand majority of the costs for treatment that the public are paying for is not dentist income. The fixed costs in running a practice exist whether a fully qualified dentist or a revised role 'part dentist' are put into the same practicing category.

The number of new dental graduates and foreign dentists registering is well in excess of need, and this oversupply is accelerating. Hence there is no need to lower standards of care to supply a service where one is already available.

Hygienists and Therapists are trained to be auxiliaries and work to support the dental team, directed by a dentist. The autonomous decision making, that is the dentist's role, should not be underestimated. If they were registered for independent practice, how and when would the boundaries of their training be enforced?

I don't have time to submit a full comment on proposed changes but hope the above realities are considered when recommending changes which will have a profound effect on the dental care in our country.

Sincerely,  
Dr Steven Clubb

[REDACTED]