

Consultation on a proposed revised *Scope of practice registration standard* and *Guidelines for scope of practice*

Feedback from the Australian Capital Territory Branch of Australian Dental and Oral Health Therapists Association.

To the Dental Board of Australia

Thank you for the opportunity to provide feedback on the proposed revised *Scope of practice registration standard* (the registration standard), proposed revised *Guidelines for scope of practice* (the guidelines), and a new *Reflective practice tool for scope of practice* (the tool). The Australian Capital Territory Branch of Australian Dental and Oral Health Therapists Association commends the Board on its body of work over the past years in reviewing the registration standards, guidelines and policies relating to dental practitioners to ensure continued relevance and consistency with other regulated health professions.

Australian Dental and Oral Health Therapists Association is **a national representative body that promotes the professional growth and development of dental and oral health therapy across Australia**. Members of the Australian Capital Territory Branch of Australian Dental and Oral Health Therapists Association live and or practice in the ACT.

Our association branch members believe that the proposed revised changes to the registration standard and the guidelines will continue to provide protection of the public by ensuring that only health practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered. Our association branch members believe that the proposed revised changes will enable the development of a more flexible, responsive and sustainable dental workforce that will be better positioned to meet the oral health needs and demands of the current and future Australian population.

Workability of current registration standard and guidelines

Our association branch members have reported that the current registration standards and guidelines continue to create some confusion regarding “a structured professional relationship” despite the Board publishing additional supporting documentation to clarify team expectations and working relationships. Members have reported concerns that in some cases this wording restricted practice of dental and oral health practitioners and created additional administration when it was originally intended to have the opposite effect. Rather than promoting a team approach to service delivery, in some cases it created a “pseudo” hierarchy and an unequal balance of power that limited some dental practitioners capacity to practice and exercise clinical judgment within their scope of practice.

Our association branch members strongly agrees with Statement 51, dot three under Remove the requirement of a structured professional relationship in the Public Consultation Document that *“dental practice is fundamentally team-based and requires practitioners to*

work with other practitioners to provide care, which includes the appropriate delegation, referral and handover of patient care.”

Issues that have arisen from applying the existing registration standard and guidelines

Our professional association experienced difficulties in advocating for amendment of regulations regarding the ACT Government’s *Medicines, Poisons and Therapeutic Goods Regulation 2008* to reflect the current scope of practice and training of dental and oral health therapists. This was because the legislatures found it challenging to interpret the difference between “independent practitioner” and “autonomous practice”. Legislatures also found it challenging to understand the professional relationship between the different health practitioners in the dental team and the levels of clinical responsibility and accountability.

Although the intent of the existing regulation standard and guidelines regarding programs to extend scope were to ensure responsible and appropriate development of new knowledge and skills within the dental workforce, approval processes for programs to extend scope had the potential to limit innovation and the development of new models of care.

Content and structure of the proposed revised registration standard and guidelines

Our association branch members believe that the proposed revised registration standards and guidelines are helpful, clear, relevant and more workable than the current registration standard and guidelines. The wording in the proposed revised scope of practice registration standard is more concise. The proposed revised guidelines reflect a more inclusive team approach to the delivery of dental healthcare. The content is well written, informative and less likely to be misinterpreted. The formatting flows in a logic manner. The overall presentation and language used in the document is non-ambiguous and easy to understand for dental practitioners, employer and consumers of dental services.

Suggested changes or deletions in the proposed revised registration standard and guidelines

Our professional association does not wish to suggest any changes or deletions in the proposed revised registration standard and guidelines.

Review period of at least every five years (rather than three)

Our association branch members believe that if the proposed registration standard and guidelines are endorsed in their entirety without any significant changes or reversion that a five year review would be appropriate as a short period of time may not allow for significant practice outcomes to become evident.

Content and structure of the new reflective practice tool

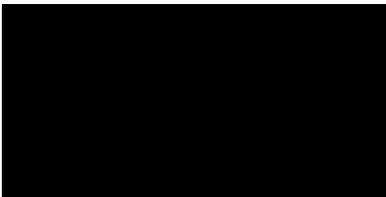
Our association branch members find the new reflective tool to be helpful and relevant. Our members strongly advocate the importance of reflective practice and incorporate this skill in their daily work as a dental or oral health therapists.

Other comments on the proposed revised registration standard and guidelines

Our professional association strongly supports the Board's preferred option (Option two) as it provides better clarity regarding expectations relating to education, training and competencies. It reduces unnecessary regulation for training and competencies. Option two provides parity between all dental practitioners and other AHPRA health professions. The Branch members believe the proposed changes will facilitate greater opportunities for enhancement of knowledge and skills across all the registered dental professions to build a more robust, collaborate and responsive dental workforce to meet the current and future oral health needs and demands.

If you require more information or clarification on the content in this submission, please contact Mrs Elizabeth Doyle on 

Yours faithfully



Elizabeth Doyle

President

ADOHTA ACT Branch