

12 May 2018

Dr J. Lockwood
Chairman
Dental Board of Australia
GPO Box 9958
Melbourne Vic 6001

Dear Sir,

Re: Consultation on a proposed revised "Scope of Practice of registration standard" and "Guidelines for scope of practice"

I feel compelled to make comment on the consultation paper provided for this process.

I would suggest "option 1 – maintain the status quo" should be adopted in this instance, not because the present process is ideal, but because the suggested changes, as presented in "option 2" could present a danger to the public and is an abrogation of the dental board's duty in protecting the public.

The proposed changes rely on a "reflective tool" in conjunction with Continuing Professional Development (CPD) to extend a dental practitioner's scope of practice from that which they had at graduation from their Australian Dental Council accredited education provider, in their approved program of study.

The reflective tool proposed, is at best, a subjective means for any dental practitioner to decide what procedures they can, or cannot, perform. The subjectivity of this assessment, along with the removal a Structured Professional Relationship in favour the concept of a, non-defined "dental team" is at the core of my concern.

The simplistic notion that "you don't know what you don't know" is particularly relevant in this context. CPD activities undertaken by dental practitioners as part of their registration requirements vary considerably in their content. The level into which information on any given topic, or treatment modality varies greatly. To allow each practitioner to self-assess, whether said CPD activity equips them to extend their Scope of Practice is problematic.

The only check on this manner of extension of a practitioner's Scope of Practice seems to be via the Dental Board's complaints process. This is too late, harm will have already been done to the public, in violation of the National Scheme's objective of protection of the public, as alluded to in note 24 of your consultation document.

Removal of the requirement of a structure for the relationship between members of a dental team, and removal of the requirement, that some dental practitioners "must not practise as independent practitioners" potentially removes a safeguard for the public in their dealings with these practitioners who were not trained in this way of practise and puts the public at further danger. The justification for these changes appears to be in the "Dental notifications classification of issues project" of the Dental Board. I would contend that should the measures in this paper be adopted

the numbers of notifications for practitioners in the affected divisions, may well change, as, although they will still be required to be part of a "dental team" this is not defined and therefore be open to varied interpretation. Affected practitioners will not necessarily have the backup required should outcomes not be up to expectations.

Again, I urge for adoption of option one, in preference to the proposed changes

Yours faithfully

