

4th May 2018

Perfect Teeth
Shop 8 Redlynch Central SC
Larsen Road
REDLYNCH QLD 4870

Dr John Lockwood
Chairman
Dental Board of Australia

Re: Scope of Practice Public Consultation

I write to express deep concern over the Dental Board's proposed changes to the Scope of Practice Registration Standard. In my view, the proposed changes pose a significant risk to patients and undermine the foundations of the dental team. Further, it is clear to me that the proposed changes have been considered in isolation and neglect to consider the broader context. Any changes to Scope of practice must also consider the legal limits to practice and the minimum competency set of all dental practitioners. I wholeheartedly support the positions of the Australian Dental Association in its submission.

The Dental Board's consultation paper states that only two per cent of dental practitioners were found to be practicing beyond scope, and dentists (including specialists) account for approximately ninety per cent of notifications annually. These statistics fail to consider the cause and effect relationship between the independent practice standards currently in place and the practitioners themselves. Of course the statistics are as they are – dentists and specialists are, ultimately, responsible for their patients under the current professional framework, as they should be. As a dentist who works closely with both oral health therapists and hygienists, discussion about and modification of treatment plans are daily occurrences. An increase in reports against auxiliary staff can be expected if these practitioners are made solely responsible for their treatment plans.

If the Board was interested in protecting the Australian public, as stated in paragraph 47, it would maintain the status quo (option one) and ensure the percentage of practitioners working outside scope remained low, and did not provide a means for this figure to increase. Maintaining the structured professional relationship and requirements of 'independent practitioner' are in the best interests of our patients nationwide.

Regards,

[REDACTED]
André Le Feuvre BDS
Dentist