



11<sup>th</sup> May, 2018

Dr John Lockwood,  
Chairman,  
Dental Board of Australia

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**Dear Dr. Lockwood,**

**Re: Scope of Practice Public Consultation**

Swan Hill District Health thank the Dental Board of Australia (the Board) for the opportunity to provide feedback as part of the Consultation process on a proposed revised Scope of practice registration standard and Guidelines for scope of practice.

**Swan Hill District Health is supportive of the proposed changes to the Scope of Practice registration standard and Guidelines for Scope of Practice set out in Option 2 of the Consultation paper**

Swan Hill District Health commends the Board for its continuing work on the Scope of Practice registration standards and guidelines and acknowledges the objectives of the National Registration and Accreditation Scheme and the regulatory principles that have informed the review and consultation process. Swan Hill District Health recognises the important objectives of the National Scheme as protection of the public, access to health services, and enabling a flexible, responsive and sustainable workforce.

Scope of practice is an evolving process which should reflect contemporary dental practice, it is appropriate that the Board has conducted this review and Swan Hill District Health agree with the content and structure of the proposed registration and guideline and is supportive of the proposed changes to the Scope of Practice registration standard and Guidelines for Scope of Practice set out in Option 2 of the consultation paper.

**1. From your perspective, how is the current registration standard and guidelines working?**

- *The DBA registration standard and guidelines has broadly met the objectives of the National Scheme.*
- *The current regulation standard and guideline provides a broad regulatory framework that complements the Code of Conduct.*
- *The requirements to work within the scope for which they have been educated and trained and are competent is clear.*
- *The principle to enable a flexible, responsive and sustainable workforce by enabling dental practitioners to practice to the full scope of their education, training and competence is supported.*

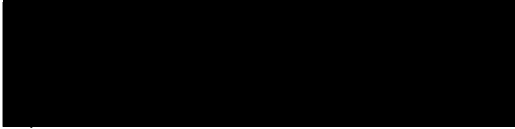
**2. Are there any issues that have arisen from applying the existing registration standard and guidelines?**

- *The requirements for a 'structured professional relationship' and the clause that dental hygienists, dental therapists and oral health therapists must not practise as 'independent practitioners' have created confusion amongst the dental profession and is an unnecessary over-regulation.*

- *All dental practitioners, including DHs, DTs and OHTs, must be registered, hold professional indemnity insurance, and be responsible for the treatment they provide to patients*
  - *All dental practitioners are subjected to the same responsibilities, and therefore, should be regulated equally within the legislative framework.*
  - *All dental practitioners are expected to have a leadership role in their area of expertise which should be recognised within the notion of team care.*
  - *All dental practitioners must seek advice and refer patients when patient needs are beyond the individual's scope of practice.*
  - *There is concern when those who are not familiar with the current practice and education of dental therapists, dental hygienists and oral health therapists are imposing limitations based on a poor understanding of their scope of practice.*
- 3. Is the content and structure of the proposed revised registration standard and guidelines helpful, clear, relevant and more workable than the current registration standard and guidelines?**
- *Swan Hill District Health support the DBA's proposed revised registration standard and guidelines under option 2*
  - *Swan Hill District Health supports the AHPRA Code of Conduct as the basis for professional performance of registered health professionals. The Code of Conduct captures the fundamental principles underlying the Structure Professional Relationship and provides greater clarity and certainty to all dental practitioners as it more aptly describes the expected way of working, including the recognition of team-based, collaborative oral health care, patient engagement and communication.*
  - *The introduction of the proposed self-reflection tool for scope of practice will assist all dental practitioners and their colleagues to recognise and work to their full scope of practice*
- 4. Is there any content that could be changed or deleted in the proposed revised registration standard and guidelines?**
- *Swan Hill District Health is satisfied with the proposed revised registration standard and guidelines.*
- 5. Do you think that a review period of at least every five years (rather than three) is appropriate? Why or why not?**
- *Swan Hill District Health has no preference for the review period on the registration standard and guidelines.*
- 6. Do you have any other comments on the proposed revised registration standard and guidelines?**
- *Swan Hill District Health considers that the revised standard balances issues of access to care with public safety by those providing dental services in Australia*
  - *Swan Hill District Health believes these changes will favourably meet the expectations of the Australian community.*
  - *Swan Hill District Health has no additional comments on the proposed revised registration standard and guidelines.*
- 7. Is the content and structure of the new reflective tool helpful, clear and relevant?**
- *Such a tool will assist Swan Hill District Health in supporting practitioners through the organisations professional development program as well as monitoring requirements of credentialing and scope of clinical practice*

- *A reflective tool is consistent with safety and quality frameworks and the dental profession's increasing focus on multidisciplinary, team-based and patient-centred care.*
- *The reflective tool models on similar frameworks that operate successfully in the public sector under good clinical governance*
- *Its application will be highly beneficial to registered dental practitioners.*

Yours sincerely, 



Paul Smith,  
Executive Officer,  
Primary Care Services.