

Inquiry into the administration of health practitioner  
registration by the Australian Health Practitioner  
Regulation Agency (AHPRA)

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*The Issue of Overseas Trained Dentists, the Australian Dental Council and  
AHPRAH*

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## **Introduction**

It is no surprise that Australia has a severe lack of dentists in rural areas, long patient waiting lists exist in almost every dental clinic in suburban areas as well as major cities and low income earners end up with avoidable tooth extractions if it was treated promptly, simply because public dental waiting queues are more than a year long. These extractions are all happening at a time when brilliant overseas dentists who already live in Australia are at home waiting for a very long assessment process to finish. This assessment process used to take 2 to 3 years but now due to a revised assessment methodology and unrealistic demands introduced in 2008 it will take an overseas dentist years longer.

I am writing to you to bring to your attention the difficult situation of overseas trained dentists and the harsh and unfair assessment process being administered by Australian Dental Council (ADC) to those dentists. I highlight why this is the case. I also highlight how difficult the assessment process is when compared with that of general practitioners. Despite highlighting these issues to AHPRA, AHPRA chose not to respond and continue to ignore the issues completely.

I am a permanent resident living in Australia. I am also a Doctor in Dental Surgery DDS from overseas. I have graduated with a Very Good merit (3.65/4.5 GPA = First Class Honors in Australia). In addition to the above, I have recently joined the Graduate Certificate in Dentistry course offered by the University of Melbourne and finished the theory component with first class honors (88/100).

## **The Registration Process and Comparison with Doctors**

The Australian Dental Council (ADC) is the authority that assesses the suitability of overseas trained dentists to practice in Australia. Overseas trained dentists need to go through the ADC assessment process to obtain the ADC Certificate, which in turn, allows them to lodge their registration application with AHPRA.

The ADC classifies overseas trained dentists into three types:

1. In the first group are dentists who graduated in the United Kingdom, Ireland, Canada (after 31 March 2010) or New Zealand. This group is eligible for direct registration in Australia without further assessment.

2. In the second group is the so called Public Sector Dental Workforce Scheme (PSDWS), introduced to help alleviate workforce shortages in the public sector, particularly in rural and remote areas. This

group includes dentists who graduated from various dental programs in Canada, Hong Kong, Malaysia, Singapore, South Africa and the US. Members of this group are eligible for exemption from the ADC Preliminary Examination, and they receive a restricted form of registration which allows them to practise in the public sector for a period of up to 3 years, during which time they must pass the ADC Final Examination.

3. In the third group are dentists who graduated from dental schools in other countries not listed above. This group must go through the full ADC examinations procedure before they can practice in Australia or complete a degree recognised by the Australian Dental Council in Australia or overseas (as in point 1). The full ADC assessment includes a preliminary examination and a final examination.

According to a document by the ADC only 14% of candidates fall into type 1 and type 2. And a staggering 86% fall into type 3 and they have to go through the full assessment process. Exact numbers are never published or revealed. The figures above were obtained from a presentation slide by the chief examiner of the ADC.

The process for 86% of overseas dentist starts by assessing their existing qualifications to assess if they partially correspond to the Australian equivalent and check whether they have existing registration in the country of graduation. This is the first hurdle as some dentists cannot obtain registration from the country of graduation because these particular countries don't give registration to foreign students who study dentistry there. So for some overseas dentists the assessment process is now finished before it even started and Australians miss out on possibly a brilliant dentist.

The ADC examinations procedure then requires candidates to sit the **Occupational English Exam (OET) (no credit is given to the more recognised IELTS Academic test)** and to pass the four skills (Writing, Listening, Reading and Speaking), all **in a single sitting**. The results from the OET test are valid for only two years. After passing the OET exam, the candidate can then apply for and sit the ADC preliminary theory test, which is administered only twice a year, so the candidate waits for months.

After passing the OET and the ADC Preliminary tests, candidates need to apply for the ADC Final Examination (Clinical Exam), which consists of a full week of practical tests. After applying for this ADC Final Examination, there is typically a delay of 12 months or more before candidates are given a

date for this exam. The exam time and venue cannot be changed or deferred by the candidate and the venue can be anywhere in Australia.

Given the limited opportunities to sit these two exams, and the intensive study required (noting it may have been some years since the candidate graduated in their home country, and that English may not be the candidates first language), it is not unusual for the two year validity period of the OET to lapse, and for these results to expire (especially when the candidate is also juggling family and work commitments). **The candidate is then required to re-sit** the OET before being able to apply for the ADC Final Examination.

After the candidate passes the ADC Final Examination, the ADC issues the ADC Certificate. However before the candidate is able to apply for registration with the National Dental Board, they must again provide evidence of English proficiency, **in this case through submitting results of OET ( and re-do the exam again if it has expired).**

Thus in many instances overseas qualified dentists are required to sit formal English exams three times (or more if they don't pass all the skills in the one sitting), despite the fact that it is impossible to pass the preliminary and clinical exams without a high level of proficiency in English. While English proficiency is obviously a necessary skill, I believe that the overly complex and repetitive nature of the qualification process is unjustified. The financial burden is also not insignificant.

To make matters worse, the ADC has been moving the bar during the recent years. Until the end of 2005, the ADC exempted applicants from sitting OET if their first language was English or if their dental training was carried out in English. Prior to 2010, the ADC allowed applicants to pass OET in several sittings, provided that all four skills were passed within two years. Also in early 2010 it was decreed that the OET results must not have expired when applying to sit the ADC Final (Clinical) exam. These changes were brought in with no notice, or consideration for dentists midway through the qualification process.

The change from allowing the different language skills to be demonstrated on different occasions, to requiring all skills to be demonstrated at a single sitting, is not a trivial one.

Any examination is a stressful event, and the subsequent increase in resitting exams only serves to obstruct the candidate progression and to benefit the training and testing industry.

All these changes have the appearance of arbitrary barriers to protect a closed shop culture. This is exacerbated by the fact that the testing agencies have a financial incentive to fail candidates.

The centre for Adult Education (CAE), which is the parent organisation of The OET Centre, mentions in its 2009 Annual Report that (sic) **"Global test registrations for 2009 increased by over 21% compared with 2008. Demand for the OET continues to be strong in all Australian cities, New Zealand, Egypt, Iran and South America. Sales of practice materials via the OET online bookshop increased by 9.53% in 2009"**. This reinforces the suspicion that these additional barriers only serve to financially benefit the assessing and regulating bodies (The OET Centre, the Australian Dental Council, the Australian Health Practitioner Regulation Agency AHPRA, the Dental Board of Australia) which are flourishing financially at the expense of applicants' exam fees. Meanwhile Australia's dental health continues to suffer from the serious undersupply of dentists.

The rules become ever more stringent and previous avenues available to overseas qualified dentists keep closing. As an example of the latter, I note that the only bridging course for overseas trained dentists, (which accepted them into 4th year of the Bachelor of Dental Science at the University of Adelaide), has been permanently cancelled this year. It seems that the position of the regulating authorities is to place as many barriers as possible in the way of overseas qualified dentists who might seek to obtain registration in Australia.

The OET just like the ADC does not publish any fail/pass statistics and would not reveal them even if requested. Other publications indicate that they do in fact calculate statistical figures, they just do not reveal them.

In comparison with the assessment process for doctors, doctors have:

- Four assessment pathways that an overseas doctor can choose from, compared to just one for dentist (ADC exam), doctors can choose from:
  - Competent Authority Pathway
  - Standard Pathway (AMC Examination)
  - Standard Pathway (workplace-based assessment)
  - Specialist Assessment Pathway (full comparability/Area of Need)
- The theory exam for doctors is administered 18 times a year compared to just twice for dentists
- Doctors have the option of several preparation courses from several Australian universities; dentists have just 1 with very limited capacity at Melbourne University. Entrance is highly competitive and candidates have to sit for yet another test to gain entrance.

## Other Major Issues and Major Problems with the Assessment Process and AHPRA

The Australian government has established the Australian Health Practitioner Regulation Agency (AHPRA) to work with the national professional boards to unify registration procedures. The AHPRA should ensure that the assessment of English proficiency is also handled in a consistent and reasonable way. As with every other competency, dentists should only be required to demonstrate English language proficiency **ONCE**, or if the candidate can prove that English was the language of the institution where he/she graduated then the candidate should be exempt. After all, the candidate cannot pass the OET exam, ADC theory and practical exam without possessing a very high level of English.

Apart from the above there are other very serious problems with the ADC assessment process:

- The ADC preliminary examination is conducted at 9:00AM Australian Eastern Time on the specified day of the exam. But it also administered at 9:00AM in other time zones such as India, the Middle East and the Americas. When this issue was highlighted in an e-mail to the ADC, the ADC did not reply. I witnessed personally candidates who did the exam earlier on the day who provided an advantage to their friends in other time zones by passing on the exam questions by phone/internet. This automatically puts the local candidates at a disadvantage.
- A simple Google search reveals that the ADC examiners are dentists who practise privately, so from a commercial point of view the ADC candidates are potential competitors. This is a clear conflict of interest. I have obtained this information by simply typing “ADC examination” and “examiner or assessor” to reveal some of the names addresses of their clinics.
- The ADC preliminary exam is not transparent. The candidates are not provided with information as to what is exactly expected of them in order to pass, i.e. what categories of topics they are going to be asked about before sitting the exam, they are simply told to “just read everything”.
- As of 2010 the ADC will no longer provide any feedback to the candidates on the assessment.
- There is no national dentist database to keep track of where dentists are needed most in Australia. Overseas trained dentists are probably the most flexible in terms relocation. This is an easy to rural needs. The current situation only adds more pressure to the above point.
- Dr Keith Watkins (chief examiner of the ADC) stated that the exam is on the same level as graduate from Australia, but when the ADC exam questions were taken to dentistry

professors at the University of Melbourne they said it was not. Dr. Watkins also said that the format of the exam was changed in 2008 to take into account the rise in the number of candidates. Anecdotal evidence suggests that even more candidates are failing. There is no authority in Australia that can verify the level of knowledge of these questions. There are candidates that obtained first class honors from Melbourne University from the same lecturers that gave the ADC examiners their degrees and yet those same ADC candidates are not passing the ADC assessment....why???

- A recent research paper from the University Adelaide Titled “Dentist labour force projections 2005 to 2020: the impact of new regional dental schools”, 2008, reveals that the ADC CEO Dr. Robert Broadbent made a prediction that only 100 dentists a year will pass the ADC examination for the period of 2009 to 2020 down from 141 in 2008. In that same year, Dr. Keith Watkins the chief examiner of the ADC stated in a radio broadcast on the internet that the number of applicants for the ADC assessment is on a sharp rise.

<http://www.dhsv.org.au/careers/overseas-trained-dentists/>

Clearly the ADC is aware of the statistics and is actively making predictions and exam policies to control the numbers of overseas dentists entering the work force.

- The meeting agendas of ACODS (Australian Council of Dental Schools) show that the heads of dental schools conduct meetings to determine trends in the dental job market. Following the first meeting the ONLY bridging course for overseas dentists at Adelaide was closed (as mentioned previously). This is clearly not fair for overseas dentists and discriminatory.
- In the same meeting above Dr. Robert Broadbent (CEO of the ADC) presented information on the number of ADC candidates that sit the preliminary exam. In a foot note below the numbers in fine print he states “*Completions’ rate does NOT equal ‘pass rate’*” indicating the numbers he presented in the meeting are not the actual numbers of the candidates that sat the exam and the candidates that passed the exam. If the ADC has nothing to hide why not reveal the actual pass rate of the exam???
- The ADC refused to reveal those numbers when approached by telephone. Minutes of this meeting can be found on the internet on the ACODS main webpage.
- Complaining procedure, the candidate has no path to complain about anything regarding the process to any government body. They are left unsupported on their own. No support is offered what so ever from anyone in Australia.
- The ADC is a registered corporation limited by guarantee and has no ties to the Australian government or any of its policies or the needs of the Australian people. The ADC does not collaborate with the immigration department either which means that the majority of



dentists who get visas to live in Australia arrive in Australia only to discover that they have spent the last of their savings on years of repeating English language exams. It puts a tremendous psychological stress, especially for those who have children. There is no support network to help them. I believe that AHPRA is not aware of this situation or in fact any Australian body.

## Recommendations

Based on the foregoing discussion, I recommend that:

- Adjust the ADC examinations time to take into account the time zones so to not to allow cheating in the exam. AHPRA should make this a top priority; no one knows how many exams have been compromised so far.
- The AHPRA be formally tasked with scrutinising and regulating the assessment processes of the Australian Dental Council in regards of overseas qualified dentists, with a view to establishing transparent, stable, and reasonable processes that do not place unnecessary hurdles in the path to registration for overseas trained dentists.
- The English proficiency requirements of the Australian Dental Council should be aligned with those of the Australian Medical Council. Specifically, formal evidence of English proficiency should be required only at the registration stage, the arbitrary requirement to pass all four English language skill-sets at the one sitting should be abolished, the IELTS Academic should be recognised as an alternative, and students studying dentistry at an English language institution should be exempt from further formal English requirements.
- The OET Centre be required to make public their exams statistics. This report should be prepared on a quarterly basis, and contain at least:
  - the percentage of applicants obtaining various grades,
  - the number of sittings undertaken by successful applicants who passed all skills in one seating,
  - A breakdown of percentages receiving the different scores, including number of seatings, and whether applicant sat the OET exam in Australia or overseas.
- AHPRA to participate in establishing a national dental employment network that deploys overseas dentists in areas of need.
- The Australian Dental Council be required to report on a six monthly basis to the general public the statistics of last ADC Preliminary theory exam and ADC Final (Clinical) exams.
- Encourage the additional support of overseas trained Dentists, by funding formal Dentistry Bridging Courses at every Australian dental program.
- Explore the possibility of implementing an on-the-job supervised assessment process for overseas qualified Dentists.
- Make the OTC preparation course (the graduate certificate in dentistry from the university of Melbourne) accredited by the ADC. It is a very high competitive course, few dentists can get accepted in it after sitting a very high competitive test (clinical and theory). The course consists

of 4 weeks theory and 4 months clinical and tutorial and all accepted candidates are being examined many times by the dental staff of the University of Melbourne during that course.

- AHPRA must ensure that the ADC provides adequate feedback to the candidates in regards to areas of improvements following the practical and preliminary exams.

### Final Comments

It took several days and several attempts to contact APRAH on the complaint line they provided on their website, and finally when I did they directed me to web link to submit my complaints, which I did. However, I did not obtain a response to any of the issues I highlighted to this day.

Please do not be surprised by the lack of complaints from other overseas trained dentists. Many of the overseas dentists I know personally refrain from speaking up for fear that it might jeopardise their application process. This is also due to lack or nonexistence of complaint channels to those dentists.

I ask for your help in bringing this issue to the public arena. What is happening to the Australians and residents who graduated from overseas dental schools is unfair. It is in fact not only unfair to those candidates but also unfair to the people of Australia who live in remote areas and have to travel for hours to find a dentist.

Please also note, that this inefficient and long assessment process is so long that many of the overseas dentists are becoming Australian citizens and call Australia home. So we are talking about Australian dentists trained overseas as well.

The process of the assessing overseas candidates must be overhauled to provide the Australian public with the required adequate dental workforce free from protectionism.

I have the information and document that back the problems and figures mentioned here in this submission. Please use [REDACTED] for further information.