

The Secretary  
Senate Community Affairs Committee  
PO Box 6100  
Parliament House  
Canberra ACT 2600

The Australian Dental Prosthetists Association Inc. (ADPA) welcomes the opportunity to offer their opinion to the Senate committee into the proposed National Registration and Accreditation Scheme for Doctors and Other Health Workers.

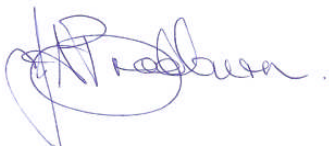
The ADPA is the peak body representing Dental Prosthetists around Australia. We currently have affiliated Associations in Tasmania, Victoria, Australian Capital Territory, New South Wales, Queensland, Western Australia and South Australia. It is anticipated that there will be an affiliated Association in the Northern Territory in the foreseeable future. At present there are 1048 registered Dental Prosthetists in Australia with 802 being members of the ADPA Inc.

A Dental Prosthetist is a Dental Care Provider, who practices autonomously, direct to the public providing services in the areas of removal dental prostheses and mouthguards, differentiating them from a Dental Technician who provides technical services to the profession on the prescription from either a Dental Prosthetist or Dentist.

Dental Prosthetists study at a post graduate Advanced Diploma or Masters level after the completion of the Diploma of Dental Technology or Bachelor of Dental Technology.

The current Executive of the ADPA Inc would be willing to offer any additional information to the committee if required and would be available to give evidence at the public hearings should the opportunity arise.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'J. Bradburn', is written over a light blue circular stamp or watermark.

Jenine Bradburn  
Secretary  
Australian Dental Prosthetists Association Inc.



## **Australian Dental Prosthetists Association Inc.**

**ADPA Inc.  
Submission to the Senate Inquiry into  
The National Registration and Accreditation Scheme for Doctors  
and Other Health Workers**

**Authorised by the ADPA Federal Executive  
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## **ADPA Inc. submission to the Senate Inquiry into The National Registration and Accreditation Scheme for Doctors and Other Health Workers**

### **(a) the impact of the scheme on state and territory health services;**

*The Australian Dental Prosthetists Association (ADPA) believes that national registration would have very little impact on state and territory health services except that in the case of dental prosthetists we face a potential loss of services as the dentist association, the Australian Dental Association (ADA), has stated on their website that they are seeking the phasing out of education and services conducted by dental prosthetists. With a combined dental board, the ADPA is concerned that if the dentist members are in the majority then they will implement the ADA policy and the public around Australia will not have the skilled services of dental prosthetists as they have done for the last 52 years.*

### **(b) the impact of the scheme on patient care and safety;**

*Patient care and safety has always been the ADPA Inc's main concern as an association of health practitioners. The only real impact national registration would have on this area of concern is that all health practitioners are on one register and therefore would be more traceable across state borders. Despite this, if current registration protocols were correctly implemented this issue would not be a problem under the current structure. Without the Federal Government taking over all health matters from the states there would be very little other benefit to patients.*

### **(c) the effect of the scheme on standards of training and qualification of relevant health professionals;**

*This is an area of extreme concern to the ADPA Inc and its members. The ADA has for many years had a plan to limit the effectiveness of any other alternative provider. On the ADA website you will find a policy promoting the phasing out of education for dental prosthetists and dental therapists. The ADA goal is for these two health professions to either be completely phased out or if this cannot happen then they could only work as an employee of a dentist.*

*In the case of dental prosthetists, we have been working as independent dental professionals for over fifty years in Australia. The ADA policy is definitely not in the public interest.*

*Our concern is if National Registration goes ahead all dental professionals will be forced on to one dental board that will be controlled by dentists who will then implement the ADA plan to eradicate the opposition. All other health professions have been given their own board and have not been squeezed onto the doctors' board. Dental appears to be the only exception.*

*Under the current state system most states have independent registration boards for dental prosthetists. It works well and in fifty years the state governments have had no cause to regret keeping dentists and dental prosthetists on independent registration boards.*

*A second issue of concern is that dental technicians as a partially regulated profession will not be registered in the first round in 2010 but will be reviewed in the second round and may or may not be registered in 2011.*

*Dental technicians are highly valued skilled health professionals and should be registered. The entire dental workforce put in a submission supporting their registration in 2010. The ADA then withdrew their support. This again is purely motivated by profit and not for health and wellbeing of the public.*

*If dental technicians are not registered in 2010 what will happen to the stand alone state boards that register them between 2010 and 2011. Dental prosthetists will be taken out of their legislation and moved to the national dental board. State health ministers will then have to decide to keep a single board functioning for twelve months while closing down all other health boards and clearing the premises. If they deregister dental technicians for this reason and then later decide to include them as yet another profession squeezed on to the new national dental board, what will happen to the registers currently held by the states?*

*It is for this reason that a decision has to be made now to respect the views of the majority of professions in dental and the wish of dental technicians themselves and register them in 2010.*

*Currently the Council of Regulating Authorities for Dental Technicians and Dental Prosthetists (CORA) is the body that accredits the training and qualification of these two dental professions. CORA also examines overseas applicants wishing to work in Australia and New Zealand. As national registration will only allow one body to perform this function for each national board then this excellent organisation will either stop functioning and hand over total control; to Australian Dental Council (ADC) or somehow come to an agreement and merge with the ADC. CORA knows little about the education of dentists and likewise the ADC knows little about the education of dental prosthetists and dental technicians. Why can't these two excellent organisations function independently in the future? It does not seem logical or in the best interest of the public. Unfortunately, for these two organisations to function independently national registration cannot happen under the planned structure of one board for the four/five dental professions.*

*You may ask "Why, if we are against a combined dental board do we support a board comprising dental technicians and dental prosthetists?" This is because all dental prosthetists are also dental technicians.*

**(d) how the scheme will affect complaints management and disciplinary processes within particular professional streams;**

*It is hard to understand how a national board can look after all complaints. The makeup and structure of the state committees is unclear at this stage and might be released by the time this enquiry is underway. At the moment the state boards for the various dental professions handle this very well and the new committees would be encompassing the four/five dental professions. It is hard to imagine that this will be an improvement.*

**(e) the appropriate role, if any, in the scheme for state and territory registration boards;**

*Under the scheme state bodies are essential as it would be impossible for a national board to function and manage independent state practitioners. Whether the states keep boards or just committees is not important as long as complaints and checking qualifications are still under local jurisdiction and then signed off nationally.*

**(f) alternative models for implementation of the scheme.**

*One alternative model the ADPA Inc would approve of is keeping the status quo. Under national registration with the one board servicing four/five different professions we can only see dental prosthetists and the public losing.*

*A second option is to give dental prosthetists and dental technicians their own registration board. If dental technicians lose the right to registration then everyone loses.*

*This should be overarched by an agreement whereby the state health ministers agree to identical legislation and portability of qualifications. With a few modifications to the standards statements to reflect state geographic and populous idiosyncrasies. No changes should be made to any state legislation without the agreement of the other states/territories.*