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From: Roger Tiang [REDACTED]
Sent: Friday, 16 December 2016 1:39 a.m.
To: Consultations
Cc: New Zealand Dental Association
Subject: Consultation on the 2017/18 draft budgets, annual practising certificate (APC) fees, disciplinary levies and other fees submissions

Dear Dental Council

I write with regards to your request for submissions regarding the document "Consultation on the 2017/18 draft budgets, annual practising certificate (APC) fees, disciplinary levies and other fees submissions"

This document and some investigation into relevant facts raise, in my opinion as a stakeholder in the topic, a number of concerns regarding the manner in which the Dental Council is fulfilling its obligations to the profession and therefore the general public.

Firstly it appears there has been a failure of the Council to recognise the NZ Dental Association as a representative of a significant proportion of the dentists in NZ. Apparently last year, when the equivalent document to that with regard to which I write today, received a submission from the NZDA it was treated as a submission from a single entity. I believe that the word of the NZDA carries the collective opinions of its membership representing the majority of dental professionals in this country. Failing to recognize this appears to be a deliberate attempt to (conveniently) ignore the views of a large proportion of the professionals in the industry. Although the Council acts in the best interests of the public and not the profession, our profession/my profession, for the most part also acts in the best interests of the public so I have the expectation that the views of a significant number of dental professionals (which is what the NZDA represents) should be given due consideration.

Secondly I have concerns regarding the increase in the APC fees for dentists which has occurred over the past two years. What appears to be happening is that dentists are paying significantly higher fees than any other comparable health professionals in NZ. I refer you to the data collated by Jonathan Broadbent. The two possible explanations here are either that dentists require a greater degree of policing than other health professions or else the Council is not utilizing its financial resources as effectively and efficiently as other equivalent regulatory bodies. My personal viewpoint which I am sure is shared by many colleagues is that the former can't really be true so sadly conclude the latter must be correct.

This leads on to my third but related concern over the financial decisions being made by the Council. In practical terms the money spent by the Council is ultimately paid for by the public of NZ via the fees charged to the profession which it has no choice but to pass on. Given the Council's primary function to protect the health and safety of the public I expect the Council to operate in a fiscally responsible manner and try to minimize the financial burden created on the public while fulfilling its functions and responsibilities.

The information in the budget contains an example of ineffective use of resources in the increase in staff costs incurred by the Council. This increase has been very large over the past two years amounting to more than 20%. However there has been no discernible benefit to the profession that I have seen at the grass roots level. How has the additional \$300,000 of wages benefitted the NZ public compared to the level of service provided 2 years ago and even prior to that?

Another example of ineffective use of resources shown in the budget is the proposed spend of approximately \$150,000 on development of Practice Standards. The NZDA has already developed and refined these (except they have been called Codes of Practice) and there is no reason why such a large amount of funds needs to be directed into completely duplicating work which has already been done. Surely the NZDA's Codes of Practice can be used as a framework for developing Practice Standards and reduce the necessary spend here?

I recognize I am not privy to the details of the ins and outs of the operation of the Council but based on the single document in question here there appears to be much which should be reviewed in the budgeted spending of the Council. Thank you for the opportunity to express my opinions on the issues (albeit you have a legal obligation to seek such opinions) and I believe that seriously considering the points I have raised in conjunction with those of other colleagues and the NZDA in this consultation process will improve the way in which the Council fulfills it's role in the provision of healthcare in NZ.

Yours sincerely

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