



**New Zealand
Dental Hygienists' Association**
(est. 1993)

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27th May 2016

Dear Members of Council,

On behalf of the members of the New Zealand Dental Hygienists' Association, we (the Executive) would like to submit our feedback on the consultation on the proposed oral health therapy scope of practice.

We are seeing an emergence of members who are graduating with an oral health degree and are in full support of this new scope being consulted on and being implemented. Some feedback we would like to submit includes:

1. We support the proposal to remove “direct clinical supervision” from “administering local anaesthetic using dentoalveolar infiltration and inferior dental nerve block techniques”. This restriction should also be removed from the dental hygienist scope of practice. Dental hygienists who have the exclusion of local anaesthetic (LA) from their scope have undertaken the same amount of training as those who complete an oral health degree. Since the bachelors' degrees require the same amount of knowledge and work as a stand-alone LA course, and the removal of ‘direct clinical supervision’ is being proposed from the proposed oral health therapy scope of practice, we request the council to remove the inclusion of ‘direct clinical supervision’ to those registered dental hygienists who have the LA exclusion.
2. We support the proposal of a consultative professional agreement for oral health therapists. We request the Council also applies this to the scopes of dental hygiene and dental therapy.
3. According to the Radiation Protection Act 1965, section 13 (2) “No person shall



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administer any radioactive material to a human being, unless that person is the holder of a licence for the time being in force under this Act authorising him to do so, or is acting under the supervision or instructions of a person so licensed". We request the council look at removing the exclusion of intra oral and extra oral radiographs from the scope of dental hygiene and draft a working document where dentists (as holders of the radiation licence) can make the decision if dental hygienists not holding the exclusion of their scope may take radiographs.

We thank you for taking time to read this submission. Further correspondence regarding this submission can be directed to our Secretary email at [REDACTED]

Kind regards,

NZDHA Executive



Association Member