



# Royal Australasian College of Dental Surgeons

Ms Marie Warner  
Chief Executive Officer  
New Zealand Dental Council  
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Wellington New Zealand

By email: [recertification@dcnz.org.nz](mailto:recertification@dcnz.org.nz)

14 September 2017

Dear Ms Warner

**Re: Dental Council consultation on recertification of oral health practitioners**

The Royal Australasian College of Dental Surgeons (RACDS) welcomes the opportunity to comment on the Dental Council New Zealand discussion document on recertification of oral health practitioners.

The RACDS promotes professional excellence in dentistry through the provision of evidenced based dental education, professional development and examination. The RACDS provide a broad range of activities to enhance the development of dentists through individually mediated studies, examinations and continued professional development.

Individual Fellows and Members of the RACDS may choose to make individual submissions.

This written submission is being made rather than a direct response to all submission questions which are better suited to individual practitioners rather than organisations such as the RACDS. The RACDS has an interest in the ongoing professional development of practitioners and it is in this context that our submission is made.

**4. Do you think the Dental Council needs to make changes to its current recertification framework?**

In the context of 'protecting the public', there was little evidence in the material provided that demonstrates that there is a problem with the current recertification framework. Notwithstanding this, the RACDS is of the view that a review of the recertification framework may be helpful for the following reasons:

The Dental Council "*have determined some aspects of the system need to change if we are to achieve our primary purpose.*"

Competence (or lack of it) may not be being transparently identified in the current framework and further development of the framework may be helpful in terms of CPD and peer contact requirements.

Given that the Dental Council are taking a 'new' approach to regulation ("*right-touch risk based*") it is appropriate that existing processes are reviewed to ensure they meet the needs implicit with this new approach. It is also simply good governance practice to review systems and processes on a regular basis to ensure they remain appropriate, relevant, consistent and responsive. In this context, and with respect to the Dental Council's intent that recertification is the system "*to ascertain compliance and confirm our practitioners are competent to practise*" then a review of the system is appropriate

A review of the current recertification framework may be appropriate but this should not imply that a wholesale change is necessary.

#### **6. Do you think the Dental Council needs to equip patients and the public to recognise poor practise?**

The Dental Council has a role in ensuring patient safety and an element of this is ensuring that patients are able to determine when their health and safety is at potential risk. The Dental Council is one of several groups that have a role educating patients on what constitutes good dental practice. If the Dental Council determines that it has a role in this, the RACDS is of the view that the focus should be on the characteristics of a good practitioner rather than on the negative connotation of poor practice.

#### **15. Do you think the Dental Council should change its current amount of prescribed hours and peer activities?**

The RACDS believes that CPD and peer contact are essential elements in ensuring practitioner currency, engagement, knowledge, and health. These activities complement other education, and self-reflective development activities and assist the practitioner in retaining and updating knowledge and skills which are required to maintain their competence.

A review of the current requirements is appropriate given that the existing requirements were put in place sometime ago and in the intervening period there has been an increased amount of research and discussion in the area. A review should be undertaken to determine if there is evidence supporting a need for change in these requirements.

#### **16. Do you think the Dental Council should change the current length of its education and learning opportunities (CPD) cycle?**

A review of the current recertification cycle duration is appropriate. This review should be undertaken in the context of the findings of the review of the prescribed hours and peer activities. It may be that there will be a requirement for variations in the length of a cycle depending on the activity and the individual practitioner.

#### **17. Please rank the following statements (with one being most important and eight being least important) according to the following question:**

Which actions should the Dental Council prioritise when considering its approach to ongoing education and learning opportunities?

The professional development requirements of practitioners are variable but usually require a mix of clinical, administrative and management elements. Practitioners need to be self-reflective to determine their own education, development and 'updating' requirements. The introduction of processes which focus on patient reported outcomes and quality of life measures would be of significant practical assistance to practitioners being 'reflective' in practice and in determining their own professional development needs.

**Additional comments**

The RACDS complements the Dental Council on their wide-ranging review and intention to consult in a meaningful way on this important matter. We look forward to contributing further on these matters as the process continues.

Kind regards

A handwritten signature in black ink, appearing to read 'K Luxford', written in a cursive style.

**Dr Karen Luxford**  
**Chief Executive Officer**