



Page 2: Information about the person or organisation completing this submission

Q1 This submission was completed by:

Name

Joanna Lowe



Q2 Are you making this submission

as a registered practitioner

Q3 Please tell us which part of the sector your submission represents

a registered dentist or dental specialist

Page 3: Area one: new core recertification programme

Q4 What, if anything, do you like about our proposed core recertification programme?

Respondent skipped this question

Phase two consultation on recertification

Q5 Is there anything about our proposed core recertification programme you would change?

Yes,

Please explain.:

The council have not demonstrated how it anticipates the proposed scheme will achieve its objectives of providing assurance to the public, managing competence, and identifying unsafe or at risk practitioners. Nor has the council demonstrated how the current system is failing. Having read the submission and attending a forum, I would remove the requirement of a professional peer. The term professional peer has not been clearly defined which creates uncertainty and makes it difficult to make a comprehensive submission. There little indication of the expectations of a professional peer, including what they do if they don't consider the other practitioner compliant. There seems to be minimal thought given to practical implications, for example: -rural areas and the ability to find peers -the willingness of practitioners to give up their time (particularly given potential liability) -compliance costs - enforcement of the scheme If the current system, requiring a practitioner to achieve a minimum number of hours dedicated to CPD is not considered sufficient to ensure competence, then another practitioner attesting you've done CPD, can't ensure competence either. Under the current system, audits are already in place to ensure practitioners have met requirements, unless it is intended that this now be delegated to professional peers? In addition, the council has made no attempt to provide any evidence that the development of a PDP and a "written reflective statement of their PDP" will add any further assurance to the public, manage practitioner competence, or aid in identifying unsafe practitioners, so I would also remove this from the proposed recertification programme.

Q6 Do you support our proposal to change the recertification cycle to 12 months?

No,

Please explain.:

The current system is adequate.

Q7 Do you think our proposed core recertification programme should include a requirement for practitioners to complete an online open-book assessment of their technical and clinical knowledge and skills?

No,

Please explain.:

Who will write the assessments required for the different specialties and at what cost? Some general practitioners chose not to do certain procedures eg, endo, dentures, implants - why should they be tested on their technical and clinical skills in these areas?

Q8 If a proposal about an online open-book assessment of a practitioner's technical and clinical skills and knowledge is supported, how often should practitioners be required to complete an assessment?

Respondent skipped this question

Phase two consultation on recertification

Q9 Do you have other proposals about our proposed core recertification programme you would like us to consider? Please explain.

Given the high costs associated with the proposed new programme, and the small percentage of unsafe practitioners, it's disappointing the council has chosen to implement changes across the entire profession, rather than taking a more refined approach targeting those with profiles that have already been identified as high risk.

Page 4: Area two: support for new registrants

Q10 What, if anything, do you like about our draft proposals for supporting new registrants?

Respondent skipped this question

Q11 Is there anything about the draft proposals for supporting new registrants you would change?

Respondent skipped this question

Q12 Do you think the proposed two year minimum period for the mentoring relationship is:

Respondent skipped this question

Q13 Do you think all new registrants should participate in a mentoring programme, or are there some new registrants who should not be required to participate in a mentoring programme?

Respondent skipped this question

Q14 Do you have other proposals about supporting new registrants you would like us to consider? Please explain.

Respondent skipped this question

Page 5: Area three: addressing health-related competence decline concerns

Q15 What, if anything, do you like about our draft proposals for addressing health-related competence decline concerns?

Respondent skipped this question

Q16 Is there anything about the draft proposals for addressing health-related competence decline concerns you would change?

Respondent skipped this question

Q17 Do you have other proposals for addressing health-related competence decline concerns you would like us to consider? Please explain.

Respondent skipped this question

Page 6: Area four: addressing recurring non-compliant practitioner behaviours

Q18 What, if anything, do you like about our draft proposals for addressing recurring non-compliant practitioner behaviours?

Respondent skipped this question

Phase two consultation on recertification

Q19 Is there anything about the draft proposals for addressing recurring non-compliant practitioner behaviours you would change?

Respondent skipped this question

Q20 Do you have other proposals for addressing recurring non-compliant practitioner behaviours you would like us to consider? Please explain.

Respondent skipped this question

Page 7: Final thoughts and comments

Q21 Do you have any other comments, suggestions or information you want to share with us about the draft proposals for improving our approach to recertification?

The proposed programme creates expensive and onerous compliance costs, which will further increase the already high cost of receiving dentistry in NZ. There is no evidence to show the proposed widespread changes will meet any of the stated aims of the council. A more refined approach would meet the council's legislative requirements without over-burdening the system.
