

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

Q1 This submission was completed by:

Name

Ludwig Jansen van Vuuren

Q2 Are you making this submission

as a registered practitioner

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

a registered dental technician

Page 3: Area one: new core recertification programme

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

I have real concerns with this proposed recertification in the format presented. This proposed change is more about compliance not competence.

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

Yes,

Please explain.:

There is lack of detail in this proposal. The Dental Council is asking stakeholders to trust, to adopt a proposal with no or little detail on how it will be structured or what consequences there will be for stakeholders if things go wrong. Give us more detail. This proposal will not prevent those who may be slipping through the current system from continuing to do so.

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

No,

Please explain.:

This gives no flexibility for practitioners to complete their proposed PDP, especially if it involves a peer from outside their business. Any down time within that year will have a negative effect on the ability of the practitioner to complete what is required.

Phase two consultation on recertification

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 would set this up, administrate, and what would it cost? If it is an online open-book assessment of their technical and clinical knowledge and skills, what curriculum will be followed in structuring a framework of knowledge that will satisfy the council that a practitioner is competent? This approach is questionable in terms of accessing technical skills. Within dentistry there are so many different techniques, materials and methods to achieve the same or similar results. Will the Dental council appoint examiners and how will standards be set?

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?

Please explain.:

I cannot support an open book assessment with the lack of detail presented. Will it take the form of practical exams, or just an online exercise?

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

My recommendation that it is best to keep and possibly improve the current APC/CPD system instead of adopting a new structure with many flaws.

Page 4: Area two: support for new registrants

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

I do like the proposal that new Registrants may be able to access mentors, but I have real concerns that it may make it very difficult for a new registrant if they cannot find anyone willing to take on the responsibility, especially if "being mentored" is a requirement.

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

Yes,

Please explain.:

I wouldn't make it mandatory. To make mentoring mandatory will place a huge burden on practitioners and stakeholders. What would happen if the Council couldn't find enough practitioners to mentor? Established practitioners cannot be forced to become a mentor, this is something that is done out of goodwill within the industry.

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

Please explain.:

This form forces you to agree with what is proposed, there should be a selection available that the proposal is not supported. The way this form is set-up, leads the person filling it in to agree to a predetermined direction.

Phase two consultation on recertification

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?

No,

Please explain.:

If you make being mentored compulsory, more detail will be needed before I can comment on the suitability of such a programme for different people. What aspects of practicing in the industry will be the focus of mentorship? - Legislation, technical/clinical competence or cultural awareness?

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

No - It is not the job of industry to mentor and integrate new registrants. Once a person has gained registration they should be deemed competent.

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?

Has the Dental Council approached the general public, NZDA and NZIDT and other dental associations to determine if there is a need to address health-related competence decline? Has the Dental council received health related competency complaints? And if there are any, what they are?

If is not real issue or problem, why propose it?

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

Yes,

Please explain.:

I am questioning the proposal regarding compulsory eye tests. No evidence is presented on the reasons behind the proposal other than consultation with an industry who will see a benefit of increased business to their members by making eye tests compulsory. If a practitioner cannot see well enough, they will use magnifying devices.

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?

Yes,

Please explain.:

Under section 29 of the Health Practitioners Competence Assurance Act 2003 is the Dental Council's responsibility to ensure practitioners competence. This proposal is shifting the emphasis of competency and the evaluation thereof on to the industry. I do not see how this will provide better assurances to the public.

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

A competent practitioner is more than likely to be compliant. Identify which practitioners that are either not compliant, competent, or both and target through your complaints procedure. In other words, look at public safety and what complaints you receive and target errant practitioners.

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?

I feel this is being rushed through without considering the significant implications and extra workload that the proposal will impose on practitioners. Many improvements could be made within the existing framework, which can address some of the identified shortcomings. There are many ways in which the current system works well as it provides exacting requirements.
