



Page 2: Your demographics

Q1 Your details

Name	Dr Suzanne Kay Tonkin
Company/organisation	[Redacted]
City/town	[Redacted]
Email	[Redacted]

Q2 Your submission is in the capacity as **dentist or dental specialist**

Page 3: The proposal

Q3 Do you agree or disagree with the proposal to remove the 18-year age limit for restorative activities from the OHT scope of practice including: accredited, gazetted programmes allowing oral health therapists to perform restorative treatment on patients 18 years and older an exclusion, such as "Restorative treatment on patients 18 years and older", being placed on oral health therapists' scopes of practice until they complete an accredited adult restorative programme which will allow them to apply to have the exclusion removed (noting that the activities registered oral health therapists can currently perform within their scope of practice remain unchanged).	Strongly disagree
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Page 4: Your support

Q4 Please describe why you support the proposal	Respondent skipped this question
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Page 5: Your concerns

Q5 Please describe your specific concern/s with the proposal

The public is required to be protected from harm due to practitioners and expanding the scope of DT's and OHT's wil potentially place the public in increased risk of harm. A course of a few days or weeks cannot replace the years longer training dentists receive at dental school.

Page 6: Details about OHT scope, qualifications and competencies

Q6 Do you have any specific feedback on the proposed amendments to the OHT scope of practice, prescribed qualifications or competencies as set out in appendices 1 & 2? **Yes**

Page 7: Specific comments on the proposal

Q7 Please provide us specific comments related to the OHT scope, qualifications and competencies.

Expanded scope of practice would need to encompass a large amount of new education to manage and understand much more complex medical histories/conditions and complications and even emergencies when treating over 18's as risks of these occurring increase along with age. Expanding the scope to include extraction of permanent teeth when only previously were trained to extract primary teeth would require a vastly expanded understanding of not only the actual removal of the teeth but also the diagnosing of various adult specific complaints (ie cracked tooth syndrome and determining if salvageable or not, whether appropriate treatment would be crown, root canal treatment and crowning or surgical removal potentially, none of which could be provided by even an extended scope DT/OHT and therefore additional cost and time to see another practitioner to be assessed, on top of treatment. Also potential bias but the practitioner and/or pressure from the public to provide the only available treatment to get the patient out of pain, rather than what is best for the patient in the long and short term could easily occur.

Page 8: Anything else

Q8 Do you have any further comments on the proposal? **Yes**

Page 10: Last thoughts

Q9 Please provide us your feedback

The public are required to be best protected from harm from the Dental community via the NZ Dental Council's legislation and there have been some very useful changes to the regulations and code of compliance for Dentists (and other practitioners) in recent years, which I believe have been effective in providing additional measures to protect the public. Expanding the scope of DT's and OHTs to provide services they are not able to be adequately trained (without undergoing years of extra training) and allowing them to now extract permanent teeth, when they are not even able to remove permanent teeth in under 18's currently, at all age groups, is certainly not providing the public with the same level of protection from potential harm by the Dental Council. The risks with the current proposal outweigh any potential benefit to the public, which appears to be very limited.
