

14 December 2020

Dental Council of NZ
Level 11, Kordia House
109-125 Willis Street
WELLINGTON 6011

Dear New Zealand Dental Council members

Re: Submission from the Auckland Dental Association regarding proposed changes to the working relationship requirements for oral health practitioners with dentists, and the practising conditions for dental hygiene activities.

The Auckland Dental Association (ADA) is comprised of 435 registered dentists and dental specialists.

We have the following concerns with the proposed changes to the working relationship requirements for oral health practitioners with dentists, and the practicing conditions for dental hygiene activities.

- **Patient Safety:** While these changes may work for many who will maintain professional relationships, our concern is for the few who will not. An informal/ verbal agreement (no signed document) is prone to assumptions, from both parties, which can be detrimental to patient outcomes and safety.
- **Scope of Practice:** Further, there is an array of training across the hygiene scope, with some trained to provide local anaesthetic, take radiographs (intra and extra-oral) and others not. How can a hygienist independently diagnose and treat periodontal disease if they cannot independently take radiographs?
- **Interdisciplinary Care:** Removing the legislated requirements for working relationships seems to go against the principles of peer meetings and interdisciplinary working relationships.
- **Treatment Planning & Patient Management:** Medical histories of patients are becoming more and more complex. Drug régimes are more complicated than ever before. Dentists should be the first to examine a new patient, developing a holistic treatment plan with insight into the complexities of a patients' medical history. The hygiene scope does not support best practice with regards to diagnosing medical conditions and poly-pharmacy.

We look forward to receiving your feedback of our concerns of your consultation document at your earliest convenience.

Yours faithfully
On behalf of the ADA Executive



Dr Usha Narshai
[President](#)
[Auckland Dental Association](#)