



Page 2: About your submission

Q1

First name

Frances

Q2

Last name

Ruddiman



Q4

New Zealand

Are you primarily based in New Zealand or overseas?

Q5

Respondent skipped this question

Company/organisation name

Q6

Registered oral health practitioner

In what capacity are you making this submission?

Page 3: About your submission

Q7

Dental specialist

What is your profession?

**Q8**

Please enter your Dental Council Person ID, if applicable

DD4957

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Page 4: Proposed registration pathways

**Q9**

**Yes**

Do you believe the proposed changes will help reduce barriers to registration for suitably trained overseas practitioners?

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**Q10**

Please tell us why:

Yes, this will reduce one barrier to registration (the time consuming individual assessment pathway). There will still be other barriers but I would expect to see an influx of overseas trained practitioners registering with NZDC

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Page 5: Introduction of the proposed 'Competent authority - registration' pathway

**Q11**

**Partially support**

Do you support the introduction of the 'Competent authority - registration' pathway?[Click to learn more about the proposed pathway](#)

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### Q12

Please tell us why:

I support this in theory but I think more safeguarding measures need to be in place. For example I think there should be an increased supervision period of 12 months. This allows for a better idea of the long-term outcomes of clinical work (which are not always immediately apparent). The DCNZ mentions using the Medical Council guidelines as a base for 6 months supervision, but private practice dentistry is very different to hospital based medicine and surgery - with less hierarchy and no immediate oversight of patient care. For this reason, 12 months will allow for safer clinicians and a safer NZ public.

I also don't think specialists applying by this pathway should have reduced requirements just because there is a perceived transparency in specialist referral practice. Importance must be placed on protection of the New Zealand public and in upholding trust in our profession and I don't think taking shortcuts is appropriate for any practitioner.

I also take exception to the lack of mechanism to revoke the registration status of someone who has applied by this pathway and upon commencing work, deemed unsuitable by the supervisor. The proposed system seems ripe with loopholes and it could be too easy to exploit by both unethical supervisors and clinicians who do not possess the requisite skill level to practice safely in NZ. I think that thought should be given to enabling a random clinical audit of the applicant and of the supervisor. The costs of this should be inbuilt into the registration fee. Also, if two supervisors do not "pass" the clinician then their provisional registration should be able to be revoked without having to go through a drawn-out disciplinary process which is expensive and time consuming, with the costs borne by other NZ dental practitioners.

The Dental Council also makes no mention whether they plan to review this pathway after a set number of years to see if it is fit for purpose and whether there have been any negative downstream effects. It would be good to have a reassessment of suitability planned within an appropriate timeframe (5 years?)

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## Page 6: Introduction of the proposed 'Comparable health system' pathway

### Q13

**Partially support**

Do you support the introduction of the 'Comparable health system' pathway for dentists?[Click to learn more about the proposed pathway](#)

### Q14

Please tell us why:

As with the Competent Authority Pathway, I believe the dental council needs to add further safeguarding mechanisms and regulatory tools to protect the health of the public. A review should be planned to allow for revision of this if it turns out to be compromising health and safety of the public. Are there going to be any guidelines as to whether more countries can be added to this list? Can a country be removed if it becomes clear that having a comparable health system does not necessarily mean they have comparable dental treatment standards?

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## Page 7: Introduction of the proposed 'Teaching and research' pathway

### Q15

**Partially support**

Do you support the introduction of the 'Teaching and research' pathway?[Click to learn more about the proposed pathway](#)

## Q16

Please tell us why:

I like this in theory as I think it is important to be able to attract more staff to teaching positions. However, I think more clarification is needed on whether they can undertake individual clinical practice. It is important that these clinicians registered under this pathway are allowed to carry out clinical work on the patients of the students they are supervising. I also think they should be allowed to do clinical work within the faculty so they can maintain their clinical skills. I agree that under this pathway they should not be able to carry out independent clinical work outside of the faculty. I also think that it should be a condition that if a specialist is registering under this pathway, that their supervisor is also a registered specialists in the same category. e.g. endo should not be supervising a periodontist etc.

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## Page 9: Proposed removal of requirement for a medical degree for oral medicine specialist registration

### Q17

**Oppose**

Do you support removing the requirement for a medical degree for oral medicine specialist registration in New Zealand, subject to the relevant medical training and clinical experiences being embedded into the specialist training programme?Click to learn more about the proposed changes.

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### Q18

Please tell us why:

This should be a decision made in conjunction with oral medicine specialists who best understand the specific needs of training for their specialty. I am not keen on anything that potentially lowering the standard of any profession

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## Page 10: Proposed removal of requirement to register in dental technology before registering in CDT

### Q19

**Support**

Do you support removing the requirement to register in dental technology before registering in clinical dental technology?Click to learn more about the proposed changes.

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### Q20

Please tell us why:

This will align us with other regulatory bodies

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## Page 11: Proposed changes to the New Zealand registration examination requirements

### Q21

**Support**

Do you support the proposed changes to the New Zealand registration examination requirements?Click to learn more about the proposed changes.

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**Q22**

Respondent skipped this question

Please tell us why:

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Page 12: Proposed administrative changes to the prescribed qualifications

**Q23**

Respondent skipped this question

Do you have feedback on the proposed administrative changes to prescribed qualifications for any of the scopes of practice, as reflected in the draft Gazette notices?

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**Q24**

Please tell us your feedback. When discussing multiple scopes, please indicate clearly which scope of practice you are referring to in your comment.

None

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Page 13: Proposed fees for the new registration pathways

**Q25**

Yes

Do you find the proposed fees for the new registration pathways reasonable?Proposed fee notice

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**Q26**

Please tell us why or why not?

Fees should be set so that the new registrant is covering all costs including the increased regulatory burden

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Page 14: Thank you for your time

**Q27**

Is there any additional feedback you would like to share on the consultation?

I would encourage the Dental Council to tread softly when making the proposed changes as once regulations are softened, it can be difficult to impose them again. The health and safety of the public must be the primary concern, with the public trust in NZ dental clinicians also important to take into consideration.

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