

NZOHA Submission: Consultation on Proposed Registration Pathways and Prescribed Qualifications

Tēnā koe Marie,

Re: NZOHA Submission on Proposed Registration Pathways and Updates to Prescribed Qualifications

Te Ohu Pūniho Ora o Aotearoa - The New Zealand Oral Health Association (NZOHA) welcomes the opportunity to provide feedback on the Dental Council of New Zealand's consultation on proposed registration pathways for overseas practitioners and updates to prescribed qualifications.

NZOHA represents oral health therapists, dental therapists, and dental hygienists practising across community, primary and secondary care settings throughout Aotearoa New Zealand. Our submission reflects our commitment and association values to public safety, professional integrity, equity of access to care, workforce sustainability, and culturally safe practice consistent with Te Tiriti o Waitangi.

1. Overall Approach to the Proposed Registration Pathways

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

NZOHA supports the intent of the proposed changes to reduce unnecessary regulatory barriers for appropriately trained overseas practitioners, provided that public safety, competence assurance, and fitness to practise in the Aotearoa New Zealand context remain paramount.

We support a risk-based, competence-focused regulatory approach, rather than one that relies solely on qualification title or jurisdiction of training. NZOHA emphasises that all registration pathways must ensure practitioners are adequately prepared for:

- Preventive and community-focused models of care
- Working within the Aotearoa New Zealand health system
- Culturally safe practice, including Te Tiriti o Waitangi obligations
- Serving populations with significant unmet oral health need

2. Competent Authority Registration Pathway



Consultation question: Do you support the proposed competent authority pathway?

NZOHA supports the competent authority pathway in principle, where it recognises practitioners from jurisdictions with comparable regulatory standards and oversight.

However, NZOHA recommends that this pathway:

- Includes mandatory orientation to the New Zealand oral health system
- Explicitly incorporates cultural safety and Te Tiriti education
- Applies consistent supervision and monitoring during any provisional registration period
- Is transparently communicated to applicants and employers

We stress that equivalence must be assessed not only in technical competence, but also in preparedness for New Zealand practice contexts.

3. Comparable Health Systems Pathway (Dentists)

Consultation question: Do you support the proposed comparable health systems pathway for dentists?

NZOHA acknowledges the rationale for this pathway in addressing dentist workforce shortages. However, we note that oral health workforce needs extend beyond dentistry alone.

NZOHA recommends that DCNZ:

- Clearly articulate how “comparability” of health systems is determined
- Consider whether similar mechanisms could be explored for other oral health professions, where appropriate
- Ensure this pathway does not reinforce dentist-centric workforce models at the expense of preventive and community-based care

4. Teaching and Research Registration Pathway

Consultation question: Do you support the teaching and research pathway?

NZOHA supports a pathway that enables suitably qualified international educators and researchers to contribute to oral health education and research in Aotearoa New Zealand.

We recommend that:

- The boundaries between educational/research activity and clinical practice are clearly defined



- Registration under this pathway does not inadvertently permit unsupervised clinical practice
- Educators are required to demonstrate understanding of New Zealand regulatory standards, cultural safety, and Te Tiriti obligations

5. Overseas Dentists Seeking Registration as Oral Health Therapists

NZOHA notes a significant omission in the consultation document: the lack of a clearly articulated pathway for overseas-trained dentists who may wish to practise within the Oral Health Therapist (OHT) scope in Aotearoa New Zealand.

NZOHA supports the development of a dedicated, transparent, and competence-based pathway for overseas-trained dentists to register as OHTs where equivalence can be demonstrated.

However, NZOHA is clear that dentistry and oral health therapy are not equivalent professions, and equivalence must not be assumed on the basis of a dental degree alone.

Oral health therapy requires demonstrated competence in:

- Preventive and health-promotion-led care
- Dental hygiene theory and practice
- Paediatric and adolescent dental therapy
- Behavioural management and whānau-centred care
- Community and population oral health
- Delegated and collaborative care models
- Culturally safe practice and Te Tiriti o Waitangi obligations

NZOHA **does not support** automatic or assumed equivalence. Any pathway must include:

- Formal competency mapping against the NZ OHT scope
- Targeted bridging education where gaps are identified
- Supervised practice within the OHT scope by OHTs
- A clear endpoint to full OHT registration

NZOHA does not support framing oral health therapy as a fallback option for dentists unable or unwilling to pursue dentist registration.

6. Dental Hygiene, Dental Therapy and Oral Health Therapy Examinations

Consultation proposal: Reopening examination eligibility to dental-qualified candidates



NZOHA acknowledges Council's proposal to reopen eligibility for the New Zealand registration examinations in dental hygiene, dental therapy and oral health therapy to candidates holding a dental qualification overseas.

While NZOHA understands the intent to provide flexibility and rely on examination outcomes as assurance of competence, we urge **strong caution**.

Council has previously restricted eligibility due to:

- Persistently poor pass rates among dental-qualified candidates
- High financial cost to applicants
- Recognition that dentistry training does not equate to competence in these scopes

These concerns remain valid, particularly for oral health therapy, which requires competence across both dental hygiene and dental therapy scopes.

NZOHA is concerned that reopening eligibility without safeguards risks:

- Continued poor pass rates and financial burden
- Examinations being used as trial-and-error pathways
- Undermining professional integrity and public confidence

7. NZOHA Recommendations on Examination Access

NZOHA recommends that DCNZ:

- Retain examination access for dental-qualified candidates only with explicit guidance that dentistry training is not equivalent
- Introduce a formal pre-assessment or advisory process for dental-qualified applicants
- Monitor and publicly report pass rates and workforce outcomes
- Ensure examination pathways do not dilute professional identity or standards

8. Oral Medicine Prescribed Qualification

Consultation question: Do you support removal of the medical degree requirement?

NZOHA supports aligning prescribed qualifications with actual training content and scope of practice, provided that essential medical competencies required for safe oral medicine practice are demonstrably met within specialist training programmes.

9. Clinical Dental Technology Prescribed Qualification

Consultation question: Do you support removal of the requirement to first register as a dental technician?



NZOHA supports this proposal, as it removes an unnecessary regulatory barrier that is not applied consistently across scopes and may delay entry into safe, supervised clinical practice.

10. Fees Associated with Proposed Pathways

Consultation question: Are the proposed fees reasonable?

NZOHA acknowledges the need for cost recovery in registration processes. However, we urge DCNZ to ensure fees remain proportionate and do not create unintended financial barriers, particularly where pathways are intended to improve workforce access and flexibility.

11. Closing Statement

NZOHA supports regulatory reform that:

- Maintains high standards of competence and public safety
- Recognises the distinct roles and scopes of all oral health professions
- Strengthens preventive, community-based models of care
- Advances equity and culturally safe practice

We welcome continued engagement with the Dental Council of New Zealand as these proposals are refined and implemented, and we would value the opportunity to contribute further to the development of clear, equitable and profession-appropriate registration pathways.

Nā mātou noa, nā

NZOHA Executive

