

Name	In what capacity are you making this submission?	Company /organisation name	Currently registered with the Dental Council?	Do you support the gazetting of the following prescribed qualifications following successful accreditation						Do you support removing the reference to a dentist qualification from the dental hygiene and dental therapy registration examination prescribed qualifications	
				For oral medicine:	Please tell us why	For paediatric dentistry:	Please tell us why	For special needs dentistry:	Please tell us why	Support	Please tell us why:
				Fellowship of the Royal Australasian College of Dental Surgeons in Oral Medicine		Fellowship of the Royal Australasian College of Dental Surgeons in Paediatric Dentistry		Fellowship of the Royal Australasian College of Dental Surgeons in Special Needs Dentistry			
Hadleigh Clark	Registered oral health practitioner Dental specialist	Te Whatu Ora	Yes	Yes	Yes. I support gazetting FRACDS in Oral Medicine and declare that I was involved in the programme's development from the RACDS side. The curriculum was co-designed by Australasian subject-matter experts and built deliberately on the Dental Council's own entry-level competencies for the specialty as well as international current competencies (e.g. UK GDC Specialty Competencies). It therefore is anchored to recognised international and New Zealand standards rather than designed in isolation. It went through an iterative College review, independent pre-accreditation review by international subject-matter experts, and evaluation by the Australian Council for Educational Research on its pedagogical design. The RACDS also independently went through a site accreditation process. The Council's own accreditation process then tested it again through a national and international expert panel with local cultural-safety and lay review, and the site evaluation team, which included senior dental academics, was satisfied that the frameworks, clinical case-load, supervision, monitoring and resourcing meet the accreditation standards. Given that the Council accredited the programme in March 2026 against the current prescribed-qualification requirements, gazetting is the logical next step to give effect to that decision. It is particularly important for oral medicine, where there is currently no active domestic training pathway. Referencing the required Health NZ confirmations in the gazette notice, as proposed, is the correct sequencing: it enables the pathway to activate once the registrar roles are established, without pre-empting those conditions. This is not a new model: FRACDS(OMS) is already a gazetted prescribed qualification for oral and maxillofacial surgery in New Zealand, so a College-accredited Fellowship pathway to specialist registration has established precedent.	Yes	Yes, for the reasons set out above and which I won't repeat in full: rigorous co-design against the Council's entry-level competencies and recognised international curricula, layered independent and international review (including ACER on educational design), and a favourable site-evaluation and accreditation outcome. For paediatric dentistry specifically, an accredited domestic pathway directly addresses a recognised workforce shortage in a discipline serving a vulnerable population, and reduces reliance on overseas recruitment for care that is better delivered by locally trained, culturally responsive specialists. The programme's small planned scale does not diminish its value. In low-volume, high-need specialties even a handful of trainees materially improves access, and establishing the accredited pathway is the foundational infrastructure that makes future growth possible.	Yes	Yes, on the same evidentiary basis. Special needs dentistry is precisely the kind of high-need, historically under-served discipline where New Zealand has not had a consistent accredited domestic specialist training pathway, leaving a gap in equitable access to care. The programme was co-designed to the Council's entry-level competencies and international benchmarks, independently reviewed for educational quality, and met the accreditation standards on clinical exposure, supervision and resourcing. Gazetting FRACDS in Special Needs Dentistry gives effect to the Council's accreditation decision and builds sustainable domestic capacity in an area of critical workforce shortage. It would be incongruous, after the significant mutual investment by both the Council and RACDS in accrediting the programme, not to gazette the qualification that the accreditation was designed to enable.	Somewhat	Somewhat. I support the principle of aligning the hygiene and therapy examination pathways with the position the Council has taken for oral health therapy, that entry to a scope's registration examination should rest on a formal qualification in that scope. A dentist qualification does not formally assess the specific competencies of dental hygiene or dental therapy, so there is a sound consistency argument for the change. My reservation is a workforce one. In a system with recognised shortages, an overseas qualified dentist can represent a readily available and clinically capable source of hygiene and therapy care, and the examination itself already functions as the competency safeguard regardless of the entry qualification. I would therefore support the removal provided the Council is satisfied it does not close off a practical pathway that is helping to meet current workforce need.
Ben Karim	Professional body	Oral Medicine Academy of Oral Medicine	No	Somewhat	Submission from the Oral Medicine Academy of Australasia (OMAA) Consultation on Proposed Prescribed Qualifications – Oral Medicine The Oral Medicine Academy of Australasia (OMAA) appreciates the opportunity to provide feedback on the Dental Council of New Zealand's consultation regarding the proposed prescribed qualifications for specialist registration in Oral Medicine. Response to Question 1 The OMAA does not support the proposal to prescribe the Fellowship of the Royal Australasian						

Name	In what capacity are you making this submission?	Company /organisation name	Currently registered with the Dental Council?	Do you support the gazetting of the following prescribed qualifications following successful accreditation						Do you support removing the reference to a dentist qualification from the dental hygiene and dental therapy registration examination prescribed qualifications	
				For oral medicine:	Please tell us why	For paediatric dentistry:	Please tell us why	For special needs dentistry:	Please tell us why	Support	Please tell us why:
				Fellowship of the Royal Australasian College of Dental Surgeons in Oral Medicine		Fellowship of the Royal Australasian College of Dental Surgeons in Paediatric Dentistry		Fellowship of the Royal Australasian College of Dental Surgeons in Special Needs Dentistry			
					College of Dental Surgeons (FRACDS) in Oral Medicine as the qualification awarded on completion of the proposed New Zealand specialist training programme in its current form. The OMAA's concerns relate to the appropriateness of the proposed qualification within the existing Royal Australasian College of Dental Surgeons (RACDS) qualification framework and the potential for confusion amongst both the profession and the public. The Fellowship of the Royal Australasian College of Dental Surgeons (FRACDS) in Oral Medicine, which already exists, is currently awarded through a separate assessment process undertaken by specialists who have already completed recognised specialist training and have subsequently accumulated a minimum of five years of specialist practice. The Fellowship therefore recognises advanced professional standing and experience beyond completion of specialist training. By contrast, graduates of accredited Australian or New Zealand Oral Medicine specialist training programmes are currently awarded Membership of the Royal Australasian College of Dental Surgeons (MRACDS) upon successful completion of their training. The Fellowship of the College does not constitute an exit qualification is not from these specialist training programmes. The proposal would therefore result in graduates of the proposed New Zealand training programme being awarded a Fellowship immediately upon completion of training, despite the Fellowship historically requiring substantial post-specialist clinical experience and an additional assessment process. The OMAA is concerned that the proposal blurs the established distinction between Membership and Fellowship pathways, both of which currently represent different stages of professional development within the RACDS qualification framework. This creates inconsistency within the College's qualification structure and has the potential to create confusion for trainees, specialists, employers, regulators, and the public regarding the significance and purpose of each qualification. The OMAA considers that qualifications prescribed for specialist registration should maintain consistency across specialist training pathways. The proposed approach does not achieve this and risks undermining the clarity and integrity of the College's qualifications. Accordingly, the OMAA recommends that the Dental Council of New Zealand reconsider the proposed prescribed						

Name	In what capacity are you making this submission?	Company /organisation name	Currently registered with the Dental Council?	Do you support the gazetting of the following prescribed qualifications following successful accreditation						Do you support removing the reference to a dentist qualification from the dental hygiene and dental therapy registration examination prescribed qualifications	
				For oral medicine:	Please tell us why	For paediatric dentistry:	Please tell us why	For special needs dentistry:	Please tell us why	Support	Please tell us why:
				Fellowship of the Royal Australasian College of Dental Surgeons in Oral Medicine		Fellowship of the Royal Australasian College of Dental Surgeons in Paediatric Dentistry		Fellowship of the Royal Australasian College of Dental Surgeons in Special Needs Dentistry			
					qualification. The OMAA thanks the Dental Council of New Zealand for the opportunity to provide feedback on this important consultation.						
Anita Nolan	Registered oral health practitioner Dental specialist	Health New Zealand	Yes	Yes		Yes		Yes		Yes	
Zanab Malik	Professional body	Australia and New Zealand Academy of Special Needs Dentistry	Yes					No	The Australia and New Zealand Academy of Special Needs Dentistry (ANZASND) welcomes the opportunity to provide feedback on the proposed accredited specialist qualifications and examination arrangements associated with the three new specialist training programmes developed by the Royal Australasian College of Dental Surgeons (RACDS). ANZASND supports the development of specialist training pathways that increase workforce capacity and provide robust educational and professional standards for future specialists. We have no objection to the establishment of specialist training programmes in principle. However, we have concerns regarding the proposal to recognise the Fellowship of the Royal Australasian College of Dental Surgeons in Special Needs Dentistry [FRACDS (SND)] as the qualification awarded upon completion of specialist training. Our concern relates to the established status and meaning of Fellowship within the RACDS framework. Historically, RACDS has recognised specialist university qualifications such as the Doctor of Clinical Dentistry (DClinDent) as equivalent to a Membership-level qualification rather than a Fellowship-level qualification. This distinction has been an important component of the College's qualification structure and professional progression pathways. Under the current RACDS		

Name	In what capacity are you making this submission?	Company /organisation name	Currently registered with the Dental Council?	Do you support the gazetting of the following prescribed qualifications following successful accreditation						Do you support removing the reference to a dentist qualification from the dental hygiene and dental therapy registration examination prescribed qualifications	
				For oral medicine:	Please tell us why	For paediatric dentistry:	Please tell us why	For special needs dentistry:	Please tell us why	Support	Please tell us why:
				Fellowship of the Royal Australasian College of Dental Surgeons in Oral Medicine		Fellowship of the Royal Australasian College of Dental Surgeons in Paediatric Dentistry		Fellowship of the Royal Australasian College of Dental Surgeons in Special Needs Dentistry			
									requirements, eligibility for FRACDS (SND) requires completion of MRACDS (SND) together with a minimum of five years of specialist or restricted specialist experience within the discipline and the successful completion of additional assessment requirements. Fellowship has therefore traditionally represented recognition of advanced specialist practice and professional achievement beyond completion of formal specialist training. ANZASND is concerned that awarding FRACDS (SND) directly upon completion of a specialist training programme may inadvertently create an equivalence between newly qualified specialists and practitioners who have subsequently completed additional years of specialist practice and satisfied the established Fellowship requirements. Such an approach risks diminishing the distinction historically associated with Fellowship and may create inconsistencies within the specialist qualification framework. We are also mindful of the implications for existing Fellows who have undertaken the established Fellowship pathway following years of specialist practice, including completion of further assessments. Prescribing FRACDS (SND) as the qualification awarded upon graduation may be perceived as inequitable by these practitioners and may generate inconsistencies with the recognition of graduates from other specialist training programmes. Accordingly, ANZASND recommends that FRACDS (SND) not be prescribed as the qualification awarded on completion of specialist training. We consider that MRACDS (SND) more appropriately reflects the level of achievement associated with successful completion of a specialist training programme while preserving the established role and significance of Fellowship as a recognition of advanced post-qualification specialist experience and assessment. ANZASND believes this approach would provide greater clarity, maintain consistency with existing RACDS qualification		

Name	In what capacity are you making this submission?	Company /organisation name	Currently registered with the Dental Council?	Do you support the gazetting of the following prescribed qualifications following successful accreditation						Do you support removing the reference to a dentist qualification from the dental hygiene and dental therapy registration examination prescribed qualifications	
				For oral medicine:	Please tell us why	For paediatric dentistry:	Please tell us why	For special needs dentistry:	Please tell us why	Support	Please tell us why:
				Fellowship of the Royal Australasian College of Dental Surgeons in Oral Medicine		Fellowship of the Royal Australasian College of Dental Surgeons in Paediatric Dentistry		Fellowship of the Royal Australasian College of Dental Surgeons in Special Needs Dentistry			
									structures, and support equity across specialist training pathways. We thank the Council for the opportunity to comment on this important matter and would welcome further discussion if required. Yours sincerely, Australia and New Zealand Academy of Special Needs Dentistry (ANZASND)		
Kelly Oliver	Employer	Women's and Children's Hospital (Australia)	No	Yes		Yes	There is a need for good quality education and experience for paediatric dentists in NZ. The existing programme does not adequately provide hospital experience which is a key facet of paediatric dentistry education. The proposed qualification addressed this deficiency and will provide opportunities to develop relevant, skilled clinical specialist training in an area of severe workforce need	Yes		Somewhat	
Nicky kilpatrick	Registered oral health practitioner Dental specialist	Royal Children's Hospital Melbourne	No	Yes		Yes		Yes		Yes	
Geoff Hunt	Registered oral health practitioner Dental specialist	Health NZ	Yes	Yes	I believe a hospital based learning program will be a far better way to learn oral medicine. The cases, over time and different hospitals will expose a registrar to a far wider range of oral medicine. The other important fact will be the daily contact with other specialist disciplines- both dental and medical	No	I believe a hospital based learning program will be a far better way to learn paediatric dentistry . The cases, over time and different hospitals will expose a registrar to a far wider range of paediatric dentistry. The other important fact will be the daily contact with other specialist disciplines- both dental and medical	Yes	I believe a hospital based learning program will be a far better way to learn special needs dentistry. The cases, over time and different hospitals will expose a registrar to a far wider range of special needs dentistry The other important fact will be the daily contact with other specialist disciplines- both dental and medical		
Manish Patel	Registered oral health practitioner Dental specialist	maxillofacial surgeon HOD	Yes	Yes	Hospital based learning is most important	Yes	Hospital based learning is most important	Yes	Hospital based learning is most important	Somewhat	
Giselle D'Mello	Registered oral health practitioner Dental specialist		No	Yes	Currently New Zealand has a significant shortage of specialists in oral medicine to manage this complex oral health condition in the population. This pathway will provide more adequately trained specialists and will embed them into local communities. It will also provide a pathway to ensure that there will always be trainees in oral medicine to meet the growing health care needs of the population.	Yes	Paediatric dentistry is a specialist area that primarily focuses on management of the oral health of children who have additional health care needs (medically and behaviourally). These services are predominantly delivered in a hospital setting and the children managed require this setting for adequate management. Currently New Zealand has a significant shortage of specialist paediatric dentists to manage the complex oral health needs of this group of children. This pathway will provide more adequately	Yes	Currently New Zealand has a significant shortage of specialist special needs dentists' to manage the complex oral health needs of this group of adults. This pathway will provide more adequately trained specialists and will embed them into communities. It will also provide a pathway to ensure that there will always be trainees in special needs dentistry to meet the growing oral	Yes	If they are registered as a dental hygienist or dental therapist, they should be able to complete the registration examination in their prescribed qualification.

Name	In what capacity are you making this submission?	Company /organisation name	Currently registered with the Dental Council?	Do you support the gazetting of the following prescribed qualifications following successful accreditation						Do you support removing the reference to a dentist qualification from the dental hygiene and dental therapy registration examination prescribed qualifications	
				For oral medicine:	Please tell us why	For paediatric dentistry:	Please tell us why	For special needs dentistry:	Please tell us why	Support	Please tell us why:
				Fellowship of the Royal Australasian College of Dental Surgeons in Oral Medicine		Fellowship of the Royal Australasian College of Dental Surgeons in Paediatric Dentistry		Fellowship of the Royal Australasian College of Dental Surgeons in Special Needs Dentistry			
							trained paediatric dental specialists and will embed them into communities. It will also provide a pathway to ensure that there will always be trainees in paediatric dentistry to meet the growing oral health care needs of the population.		health care needs of the ageing population.		
Mark Schifter	Registered oral health practitioner Dental specialist	Westmead Hospital/University of Sydney	No	Yes	1. Reduce the substantial cost of training 2. Ensures training occurs where there are sufficient patient's with sufficient range and complexity of conditions 3. Ensures integration with medicine - essential for oral medicine 4. Ensures truly immersdive clincial rotations	Yes	Please see above	Yes	Please see above	No	Not familiar with this issue.
Abbey Corbett	Registered oral health practitioner Dental specialist		Yes	Yes		Yes		Yes			
Michael Brosnan	Registered oral health practitioner Dental specialist	Specialist Dental Unit Waikato Hospital	Yes	Yes		Yes		Yes		Yes	
Guo LING	Registered oral health practitioner Dental specialist	Hospital & Specialist Dentistry Auckland	Yes	Yes		Yes		Yes		Yes	
Mathew Lim	Registered oral health practitioner Dental specialist	N/A	No	No	This is not an equivalent qualification to the other prescribed qualifications (MDS/DClinDent). RACDS recognises MRACDS as equivalent to DClinDent currently and only allows examination for FRACDS after 5 years of specialist practice. As such, use of this qualification would be suggestive to the public that a graduate from the RACDS pathway was equivalent to another specialist with 5 years of specialist practice experience.	No	This is not an equivalent qualification to the other prescribed qualifications (MDS/DClinDent). RACDS recognises MRACDS as equivalent to DClinDent currently and only allows examination for FRACDS after 5 years of specialist practice. As such, use of this qualification would be suggestive to the public that a graduate from the RACDS pathway was equivalent to another specialist with 5 years of specialist practice experience.	No	This is not an equivalent qualification to the other prescribed qualifications (MDS/DClinDent). RACDS recognises MRACDS as equivalent to DClinDent currently and only allows examination for FRACDS after 5 years of specialist practice. As such, use of this qualification would be suggestive to the public that a graduate from the RACDS pathway was equivalent to another specialist with 5 years of specialist practice experience.	Yes	

Name	In what capacity are you making this submission?	Company /organisation name	Currently registered with the Dental Council?	Do you support the gazetting of the following prescribed qualifications following successful accreditation						Do you support removing the reference to a dentist qualification from the dental hygiene and dental therapy registration examination prescribed qualifications	
				For oral medicine:	Please tell us why	For paediatric dentistry:	Please tell us why	For special needs dentistry:	Please tell us why	Support	Please tell us why:
				Fellowship of the Royal Australasian College of Dental Surgeons in Oral Medicine		Fellowship of the Royal Australasian College of Dental Surgeons in Paediatric Dentistry		Fellowship of the Royal Australasian College of Dental Surgeons in Special Needs Dentistry			
Graeme Ting	Registered oral health practitioner Dental specialist		Yes	Yes				Yes			
Pagan Neil	Registered oral health practitioner Oral health therapist	Health NZ	Yes	Yes		Yes		Yes			
Emma Courtney	Registered oral health practitioner Dentist	Lumino The Dentists	Yes	Yes		Yes		Yes		Yes	
Hamish Crabb	Registered oral health practitioner Dentist	Te Toku Tumai	Yes	Yes	Training within a hospital environment and distribution of training sites seems beneficial to the programme. No other accredited programmes at present	Yes	Training within a hospital environment and distribution of training sites seems beneficial to the programme.	Yes	Training within a hospital environment and distribution of training sites seems beneficial to the programme. No other accredited programmes at present		
Beatrice Ng	Registered oral health practitioner Dental specialist	Te Whatu Ora Te Toka Tumai Auckland	Yes	Yes	Training sites and specialist-training programmes have been accredited by DCNZ and RACDS. Hospital based training provides on-the-job training for diverse patient experience, collegiality and collaboration. Specialist trainee will also be able to contribute to short staffing problems at hospitals. There is few and difficult recruitment due to scarcity of suitably registered and experienced specialists into this highly needed fields.	Yes	Training sites and specialist-training programmes have been accredited by DCNZ and RACDS. Hospital based training provides on-the-job training for diverse patient experience, collegiality and collaboration. Specialist trainee will also be able to contribute to short staffing problems at hospitals. There is few and difficult recruitment due to scarcity of suitably registered and experienced specialists into this highly needed fields.	Yes	Training sites and specialist-training programmes have been accredited by DCNZ and RACDS. Hospital based training provides on-the-job training for diverse patient experience, collegiality and collaboration. Specialist trainee will also be able to contribute to short staffing problems at hospitals. There is few and difficult recruitment due to scarcity of suitably registered and experienced specialists into this highly needed fields.	Somewhat	Unsure of dental hygienist and dental therapist training
Tihema Nicol	Registered oral health practitioner Dentist		Yes	Yes		Yes		Yes		Yes	

Name	In what capacity are you making this submission?	Company /organisation name	Currently registered with the Dental Council?	Do you support the gazetting of the following prescribed qualifications following successful accreditation						Do you support removing the reference to a dentist qualification from the dental hygiene and dental therapy registration examination prescribed qualifications	
				For oral medicine:	Please tell us why	For paediatric dentistry:	Please tell us why	For special needs dentistry:	Please tell us why	Support	Please tell us why:
				Fellowship of the Royal Australasian College of Dental Surgeons in Oral Medicine		Fellowship of the Royal Australasian College of Dental Surgeons in Paediatric Dentistry		Fellowship of the Royal Australasian College of Dental Surgeons in Special Needs Dentistry			
Anna Dawson	Registered oral health practitioner Dentist		Yes	Yes	DCNZ has accredited this programme as academically and experientially robust for specialist qualification upon successful completion. This specialty is critically short in New Zealand, with only 6 out of the 8 registered practitioners currently working in New Zealand and no other currently local accredited course for incoming trainees. My experience in leading a large tertiary hospital dental service is that New Zealand needs locally trained, medically qualified Oral Medicine Specialists. We have struggled to recruit suitably qualified and experienced overseas candidates for roles and without this pathway to specialist qualification I don't see how we would encourage junior dentists to both train in Oral Medicine in overseas programmes and then return to work in New Zealand. The regular feedback I hear from our dental house officers is that they wish to stay in New Zealand, train locally and experience a broad base of patients and interdiscipline connection. This programme, including the Paediatric Dentistry and Special Needs Dentistry offers them this opportunity including remuneration for their work. The quality of the programme and the local sites have been accredited by DCNZ and RACDS, there is precedent and experience of such a training programme and gazetting of the qualifications with the Oral & Maxillofacial Surgery programme run through RACDS.	Yes	Answer as per above. I acknowledge there is a local accredited training programme available, however this training programme leading to specialist qualification offers choice for trainees. As the programme and training sites have been accredited by DCNZ and RACDS, the three training programmes should be recognised as prescribed qualifications for specialty registration	Yes	As per answers above, this specialty is difficult to recruit to and there are no other currently accredited training options for local trainees. The training programmes have been accredited by DCNZ and RACDS for the academic programme and diverse, broad patient experience at the training sites. The he three training programmes should be recognised as prescribed qualifications for specialty registration.	Yes	
Julie Schultz	Registered oral health practitioner Dental hygienist	Kowhai Dental	Yes	Yes		Yes		Yes		Yes	
Anna Gardner	Registered oral health practitioner Practice owner	PAG Dental	Yes	No	I do not believe there will be adequate training or support.	Somewhat		Somewhat		Somewhat	

Name	In what capacity are you making this submission?	Company /organisation name	Currently registered with the Dental Council?	Do you support the gazetting of the following prescribed qualifications following successful accreditation						Do you support removing the reference to a dentist qualification from the dental hygiene and dental therapy registration examination prescribed qualifications	
				For oral medicine:	Please tell us why	For paediatric dentistry:	Please tell us why	For special needs dentistry:	Please tell us why	Support	Please tell us why:
				Fellowship of the Royal Australasian College of Dental Surgeons in Oral Medicine		Fellowship of the Royal Australasian College of Dental Surgeons in Paediatric Dentistry		Fellowship of the Royal Australasian College of Dental Surgeons in Special Needs Dentistry			
Avis Barker	Registered oral health practitioner Dentist	32 Pearls Family Dentistry	Yes	Somewhat	It is important to have specialized training in oral medicine but that should be covered education during general dentist training.	Yes	There should be a pediatric specialty training as these practitioners should understand and be qualified to use general anesthesia with the ability to treat complex special needs children.	Somewhat	This depends on the training. If the training includes general anesthesia in order to provide care for the special needs under general anesthesia then I am in support. If it is simply for general dentists to be able to treat the special needs without general anesthesia than I do not support as special needs dentistry should be a part of the general dentistry curriculum.	No	Dental hygienists need specialized training on order to ensure quality care for the communities
Leeann Waaka	On behalf of the Oral Health National Clinical Network Representati on of the oral health sector though as an individual I am a dental Therapist	Health NZ Te Whatu Ora National Oral Health Clinical Network	Yes	Yes		Yes		Yes		Yes	
Ajith Polonowita	Registered oral health practitioner Dental specialist		Yes	No	Lack of research Inexperience of teachers in teaching No specific paid positions of the teachers for teaching Student experience Recognition by peers after qualification This should be a combined process between the College Academy and University	Somewhat		Somewhat		Somewhat	
Ravichandra Juluri	Registered oral health practitioner Dentist		No	Yes		Yes		Yes		Yes	
Suvarna Pattanshetti	Registered oral health practitioner Oral health therapist		Yes					Yes	Because the dental school in NZ does not have the program for special needs Dentistry. We have a huge population who need help and they hav no place to go. They just need basic treatment. It will be very	Yes	

Name	In what capacity are you making this submission?	Company /organisation name	Currently registered with the Dental Council?	Do you support the gazetting of the following prescribed qualifications following successful accreditation						Do you support removing the reference to a dentist qualification from the dental hygiene and dental therapy registration examination prescribed qualifications	
				For oral medicine:	Please tell us why	For paediatric dentistry:	Please tell us why	For special needs dentistry:	Please tell us why	Support	Please tell us why:
				Fellowship of the Royal Australasian College of Dental Surgeons in Oral Medicine		Fellowship of the Royal Australasian College of Dental Surgeons in Paediatric Dentistry		Fellowship of the Royal Australasian College of Dental Surgeons in Special Needs Dentistry			
Derek GOODISSON	Registered oral health practitioner Dental specialist		Yes	Yes	Oral Medicine is highly specialised and akin to dermatology(1). Vocational registration with it that there will be a rigorous training programme 1. Personal conversation with Roy Rodgers, Eastman Dental Hospital 1994)	Yes	It would seem that paediatric dentistry is sufficiently complex to justify a vocational training programme	Yes	As above Additionally, these three areas are likely to be mostly hospital base, and able to attract specialist recognition, rather than dental offers of special scale (DOSS)	Somewhat	Although unsure of what the dental hygienist training involves, the selection and training of dentists would seem to be rigorous enough to produce independent practitioners. The creeping evolution of a scope of practice should be challenged and training programmes adjusted to accommodate expanding scopes
Ajeshwar Lal	Registered oral health practitioner Dental therapist		Yes	Yes	I support the accreditation and gazetting of the Fellowship of the Royal Australasian College of Dental Surgeons (RACDS) as a prescribed qualification. RACDS is a well-established and highly respected specialist training institution with a long history of delivering rigorous, evidence-based education, assessment, and ongoing professional development. Recognition of this qualification would help ensure that New Zealand continues to benefit from highly trained dental specialists who meet internationally recognised standards of clinical competence, professionalism, and patient care. Accrediting this pathway would also support workforce development and provide confidence to both the profession and the public regarding the quality of specialist training.	Yes	I support the accreditation and gazetting of the Fellowship of the Royal Australasian College of Dental Surgeons (RACDS) as a prescribed qualification. RACDS is a well-established and highly respected specialist training institution with a long history of delivering rigorous, evidence-based education, assessment, and ongoing professional development. Recognition of this qualification would help ensure that New Zealand continues to benefit from highly trained dental specialists who meet internationally recognised standards of clinical competence, professionalism, and patient care. Accrediting this pathway would also support workforce development and provide confidence to both the profession and the public regarding the quality of specialist training.	Yes	I support the accreditation and gazetting of the Fellowship of the Royal Australasian College of Dental Surgeons (RACDS) as a prescribed qualification. RACDS is a well-established and highly respected specialist training institution with a long history of delivering rigorous, evidence-based education, assessment, and ongoing professional development. Recognition of this qualification would help ensure that New Zealand continues to benefit from highly trained dental specialists who meet internationally recognised standards of clinical competence, professionalism, and patient care. Accrediting this pathway would also support workforce development and provide confidence to both the profession and the public regarding the quality of specialist training.	No	I do not support this change because it provides an opportunity for experienced dentists to demonstrate their competence through the prescribed registration examinations and enter the oral health workforce upon meeting the required standards. This approach maintains patient safety while helping address workforce shortages and improving access to care. Recognising competence through robust assessment processes is an appropriate and practical way to support workforce needs while maintaining high professional standards. In addition to benefiting the oral health sector, this change would also benefit New Zealand more broadly by enabling the skills, experience, and qualifications of migrants to be utilised more effectively. Many overseas-trained professionals bring valuable expertise and a strong commitment to contributing to New Zealand society. Providing a fair and robust pathway for competent practitioners to enter the workforce allows them to contribute more meaningfully to the economy, strengthens the health workforce, and helps maximise the value of skilled migration while maintaining professional standards.

Name	In what capacity are you making this submission?	Company /organisation name	Currently registered with the Dental Council?	Do you support the gazetting of the following prescribed qualifications following successful accreditation						Do you support removing the reference to a dentist qualification from the dental hygiene and dental therapy registration examination prescribed qualifications	
				For oral medicine:	Please tell us why	For paediatric dentistry:	Please tell us why	For special needs dentistry:	Please tell us why	Support	Please tell us why:
				Fellowship of the Royal Australasian College of Dental Surgeons in Oral Medicine		Fellowship of the Royal Australasian College of Dental Surgeons in Paediatric Dentistry		Fellowship of the Royal Australasian College of Dental Surgeons in Special Needs Dentistry			
Yolin Govender	Registered oral health practitioner Dentist	Auckland Dental Facility, University of Otago	Yes	No	NZ has a trans tasman agreement with Australia. Medicine is not a requirement for Oral Medicine in Australia and should therefore not be a requirement in NZ. This limits the number of trainees and specialist output.	Yes		Yes		Yes	
Alexandra France	Registered oral health practitioner Dentist		Yes	Yes	Need more oral medicine specialists	Yes		Yes	Need more special needs dental providers	Somewhat	
Suhaib Borgeia	Registered oral health practitioner Dentist	Lumino the dentist	Yes	Yes		Yes		Yes		Yes	
Jessica Gordon	Registered oral health practitioner Oral health therapist	Raglan Smiles	Yes	Yes	We are so short on clinicians in NZ we need them!	Yes	We are so short on clinicians in NZ we need them	Yes	We are so short on clinicians in NZ we need them	Yes	
Michele Sutin	Registered oral health practitioner Dental hygienist		Yes	Yes		Yes		Yes		Yes	Dentists are not hygienists or dental therapists.
Vikki Nelson	Registered oral health practitioner Dentist	Keith Nelson dental ltd	Yes	Somewhat		Somewhat		Somewhat		Yes	

Name	In what capacity are you making this submission?	Company /organisation name	Currently registered with the Dental Council?	Do you support the gazetting of the following prescribed qualifications following successful accreditation						Do you support removing the reference to a dentist qualification from the dental hygiene and dental therapy registration examination prescribed qualifications	
				For oral medicine:	Please tell us why	For paediatric dentistry:	Please tell us why	For special needs dentistry:	Please tell us why	Support	Please tell us why:
				Fellowship of the Royal Australasian College of Dental Surgeons in Oral Medicine		Fellowship of the Royal Australasian College of Dental Surgeons in Paediatric Dentistry		Fellowship of the Royal Australasian College of Dental Surgeons in Special Needs Dentistry			
Ulrike Herzhoff	Registered oral health practitioner Oral health therapist		Yes	Yes		Yes		Yes		Yes	
Mo Amso	Professional body	NZ Dental Association (NZDA)		Yes	The NZDA is aware of the extensive work undertaken by the RACDS to develop and implement their specialist training programmes in oral medicine, paediatric dentistry and special needs dentistry. Dental workforce challenges extend to training opportunities in these dental specialties. NZDA agrees with the RACDS that specialist training within the hospital environment should be a successful approach for these dental specialties. NZDA understands that there has been ongoing discussion between the RACDS and Health NZ regarding funding for the necessary dental registrar positions to commence in 2027. NZDA understands Health NZ has recently indicated the positions can proceed in 2027, which is consistent with the Health NZ Workforce Plan in 2024. NZDA confirms that it supports gazetting of the prescribed qualifications of Fellowship of the Royal Australasian College of Dental Surgeons in oral Medicine, Paediatric Dentistry and Special Needs Dentistry. We wish the RACDS the very best with this development for dental specialist workforce training in New Zealand.	Yes	NZDA confirms that it supports gazetting of the prescribed qualifications of Fellowship of the Royal Australasian College of Dental Surgeons in oral Medicine, Paediatric Dentistry and Special Needs Dentistry.	Yes	NZDA confirms that it supports gazetting of the prescribed qualifications of Fellowship of the Royal Australasian College of Dental Surgeons in oral Medicine, Paediatric Dentistry and Special Needs Dentistry.		
Donna Kennedy		New Zealand Society of Hospital And Community Dentistry		Yes	Support for the Proposed New Model of Hospital Based Training The New Zealand Society of Hospital and Community Dentistry (NZSHCD) welcomes the opportunity to provide feedback on the DCNZ’s proposed new model of hospital based training. As a professional body representing clinicians working across Aotearoa’s hospital dental services, we strongly support the introduction of a modernised, structured, and fit for purpose training pathway that reflects the realities of contemporary hospital practice and the needs of our communities. 1. Alignment with Workforce Needs and Service Delivery Hospital dental services in New Zealand manage some of the most complex, high needs, and medically compromised patient groups. The proposed training model appropriately recognises the advanced competencies required to deliver safe.	Yes	The NZSHCD strongly supports the proposed new model of hospital based training.	Yes	The NZSHCD strongly supports the proposed new model of hospital-based training.		

Name	In what capacity are you making this submission?	Company /organisation name	Currently registered with the Dental Council?	Do you support the gazettement of the following prescribed qualifications following successful accreditation						Do you support removing the reference to a dentist qualification from the dental hygiene and dental therapy registration examination prescribed qualifications	
				For oral medicine:	Please tell us why	For paediatric dentistry:	Please tell us why	For special needs dentistry:	Please tell us why	Support	Please tell us why:
				Fellowship of the Royal Australasian College of Dental Surgeons in Oral Medicine		Fellowship of the Royal Australasian College of Dental Surgeons in Paediatric Dentistry		Fellowship of the Royal Australasian College of Dental Surgeons in Special Needs Dentistry			
					equitable, and evidence based care in these settings. A structured hospital based training pathway will: • Equip trainees with the clinical depth required for managing increasingly medically complex patients • Strengthen the workforce pipeline for hospital and community dental services • Support regional equity by ensuring consistent training standards across the motu • Allow trainees to develop skills in multidisciplinary settings This model responds directly to long standing workforce shortages and the increasing complexity of patients presenting to secondary and tertiary services. 2. Improved Training Quality and Consistency The NZSHCD supports the introduction of clearer curriculum expectations, competency milestones, and supervised clinical experience. The current variability in hospital based training opportunities has created inequities in both trainee experience and service delivery. A nationally coordinated model will: • Provide consistent exposure to core hospital dentistry competencies • Ensure trainees gain experience in acute care, special needs dentistry, and medically complex case management • Strengthen quality assurance through structured supervision and assessment • Support safe, high quality care for vulnerable patient groups This approach aligns with international best practice and will raise the standard of hospital dentistry across New Zealand. 3. Benefits for Patient Care and Public Health Hospital dental services play a critical role in addressing unmet oral health needs, reducing hospital admissions, and supporting broader public health goals. A strengthened training pathway will: • Improve access to clinicians skilled in managing complex oral health conditions • Reduce delays in accessing care for high needs patients • Support early intervention and prevention within hospital settings • Enhance the integration of oral health within wider medical health care The proposed model will ultimately improve patient outcomes and support the health system's commitment to equity.						

Name	In what capacity are you making this submission?	Company /organisation name	Currently registered with the Dental Council?	Do you support the gazetting of the following prescribed qualifications following successful accreditation						Do you support removing the reference to a dentist qualification from the dental hygiene and dental therapy registration examination prescribed qualifications	
				For oral medicine:	Please tell us why	For paediatric dentistry:	Please tell us why	For special needs dentistry:	Please tell us why	Support	Please tell us why:
				Fellowship of the Royal Australasian College of Dental Surgeons in Oral Medicine		Fellowship of the Royal Australasian College of Dental Surgeons in Paediatric Dentistry		Fellowship of the Royal Australasian College of Dental Surgeons in Special Needs Dentistry			
				4. Support for Structured Progression and Professional Identity The NZSHCD particularly endorses the model's emphasis on: • Clear progression from entry level hospital clinician to advanced practice • A training structure that supports retention, professional development, and long term workforce sustainability This clarity will help attract clinicians to hospital practice and provide a meaningful career pathway within the public sector. 5. Commitment to Collaboration The NZSHCD is committed to working with the Dental Council of NZ, supporting training providers and hospital oral health services to enable implementation of the new model. We welcome ongoing dialogue regarding curriculum development, supervision frameworks, and assessment processes, and we are willing to contribute expertise from our membership to ensure the model is robust, practical, and reflective of real world hospital practice. Conclusion The NZSHCD strongly supports the proposed new model of hospital based training. It represents a timely and progressive step toward strengthening NZ's hospital dental workforce and improving care for our most vulnerable patient groups. We commend the Dental Council for its leadership in this area and look forward to contributing to the next stages of development.							
Anna Holyoake	Professional body	Te Phu Puniho Ora o Aotearoa New Zealand Oral Health Association (NZOHA)		Yes	NZOHA welcomes the establishment of accredited Aotearoa New Zealand (NZ) specialist training pathways in these disciplines. These programmes will strengthen NZ's specialist workforce, improve access to specialist services, and help address recognised workforce shortages.	Yes	NZOHA welcomes the establishment of accredited Aotearoa New Zealand (NZ) specialist training pathways in these disciplines.	Yes	NZOHA welcomes the establishment of accredited Aotearoa New Zealand (NZ) specialist training pathways in these disciplines.	Yes	NZOHA supports the proposed removal of the reference to a dentist qualification from the prescribed qualifications for the dental hygiene and dental therapy registration examinations. We acknowledge that this proposal is a consequential amendment following the Council's previous decision not to permit overseas-qualified dentists to enter the NZ oral health therapy registration examination solely on the basis of holding a dental qualification. As such, we support the amendment as an appropriate measure to ensure consistency across the oral health therapy, dental hygiene

Name	In what capacity are you making this submission?	Company /organisation name	Currently registered with the Dental Council?	Do you support the gazettement of the following prescribed qualifications following successful accreditation						Do you support removing the reference to a dentist qualification from the dental hygiene and dental therapy registration examination prescribed qualifications	
				For oral medicine:	Please tell us why	For paediatric dentistry:	Please tell us why	For special needs dentistry:	Please tell us why	Support	Please tell us why:
				Fellowship of the Royal Australasian College of Dental Surgeons in Oral Medicine		Fellowship of the Royal Australasian College of Dental Surgeons in Paediatric Dentistry		Fellowship of the Royal Australasian College of Dental Surgeons in Special Needs Dentistry			
											and dental therapy registration pathways. NZOHA has consistently supported the principle that applicants seeking registration through a NZ registration examination should hold a recognised qualification in the scope of practice for which they are seeking registration, Registration examinations are intended to assess competence within an existing profession and should not serve as an alternative pathway into a different Hscope of practice. Dental hygiene and dental therapy are distinct professions with their own prescribed qualifications, competencies, educational programmes, and scopes of practice. Maintaining profession-specific registration pathways appropriately reflects these differences while ensuring consistency and transparency within NZ's regulatory framework. Accordingly, NZOHA supports the Council's proposal to remove the reference to a dentist qualification from the prescribed qualifications for the dental hygiene and dental therapy registration examinations. This provides consistency across the oral health therapy, dental hygiene and dental therapy registration pathways and appropriately reflects the Council's previously consulted and adopted policy position.
Philippa Greer	Registered oral health practitioner Dental specialist	Capital and Coast, Te Whatu Ora		Yes	I support the Dental Council's proposal to introduce a hospital-based specialist training model. As an Oral Medicine Specialist working within New Zealand's hospital dental service, I support the Dental Council's proposal to introduce a hospital-based specialist training model. This change is necessary to sustain Oral Medicine and other hospital-related specialties, addressing long-standing gaps in New Zealand's training system. Currently, New Zealand lacks an accredited specialist training pathway in Oral	Yes	I support the Dental Council's proposal to introduce a hospital-based specialist training model.	Yes	I support the Dental Council's proposal to introduce a hospital-based specialist training model.		

Name	In what capacity are you making this submission?	Company /organisation name	Currently registered with the Dental Council?	Do you support the gazetting of the following prescribed qualifications following successful accreditation						Do you support removing the reference to a dentist qualification from the dental hygiene and dental therapy registration examination prescribed qualifications	
				For oral medicine:	Please tell us why	For paediatric dentistry:	Please tell us why	For special needs dentistry:	Please tell us why	Support	Please tell us why:
				Fellowship of the Royal Australasian College of Dental Surgeons in Oral Medicine		Fellowship of the Royal Australasian College of Dental Surgeons in Paediatric Dentistry		Fellowship of the Royal Australasian College of Dental Surgeons in Special Needs Dentistry			
					Medicine. Clinicians must either train in Australia, which involves high tuition and relocation costs, or gain limited domestic experience without a recognized program. This barrier has hindered workforce stability and created inequity, as only those with significant financial resources can pursue overseas training. It also means trainees must leave their support networks to embark on a stressful training experience in a foreign culture and system. A hospital-based model will establish a local, accredited pathway, train clinicians in relevant settings, retain talent in the public health system, and reduce reliance on costly overseas programs. Oral Medicine specialists manage patients with immune-mediated mucosal diseases, chronic orofacial pain, salivary gland dysfunction, oral manifestations of systemic disease, rare or undiagnosed oral conditions, and complex medical comorbidities. These patients are often medically fragile or immunosuppressed and require coordinated care across multiple medical and dental disciplines. Hospital-based training provides consistent exposure complex patients, interdisciplinary case management, acute care experience, and access to diagnostic and specialist medical resources. University-only programs cannot replicate this environment. With six Oral Medicine Specialists serving 5.2 million people, New Zealand's workforce is small compared to similar countries. Australia has over eight times as many specialists, supported by established accredited training programs. New Zealand's lack of a domestic training path and leaves the workforce static and vulnerable. The loss of even one clinician can destabilize national service delivery. The absence of a local training pathway has led to long wait times for complex patients, limited access outside major centers, inequitable care for Māori, Pasifika, and rural communities, service vulnerability, and reduced continuity as trainees must leave New Zealand for years. A hospital-based training model is essential to address these issues and ensure sustainable specialist care. Oral Medicine is primarily a hospital specialty, not a university academic						

Name	In what capacity are you making this submission?	Company /organisation name	Currently registered with the Dental Council?	Do you support the gazettement of the following prescribed qualifications following successful accreditation						Do you support removing the reference to a dentist qualification from the dental hygiene and dental therapy registration examination prescribed qualifications	
				For oral medicine:	Please tell us why	For paediatric dentistry:	Please tell us why	For special needs dentistry:	Please tell us why	Support	Please tell us why:
				Fellowship of the Royal Australasian College of Dental Surgeons in Oral Medicine		Fellowship of the Royal Australasian College of Dental Surgeons in Paediatric Dentistry		Fellowship of the Royal Australasian College of Dental Surgeons in Special Needs Dentistry			
					discipline. Internationally, training occurs within tertiary hospitals, multidisciplinary medical teams, specialist diagnostic services, and acute care pathways. A hospital-based model ensures trainees gain experience with real-world complexity, supports safe and evidence-based care for vulnerable patients, strengthens integration with medical specialties, creates a sustainable workforce pipeline, and reduces inequity by allowing trainees to remain in New Zealand. New Zealand needs a hospital-based training pathway for Oral Medicine. The lack of an accredited program has created workforce fragility, inequity, and barriers to care for medically complex patients. The proposed model is a vital step toward training, retaining, and supporting specialists who serve vulnerable communities. The Dental Council's recognition of the need for these programmes offers a welcome relief to those of us working in the sector.						