

12 August 2024

Tēnē koe,

Feedback on the future of classifying occupation data in Aotearoa New Zealand

Thank you for the opportunity to provide feedback on the proposed changes to the classifying occupation data in Aotearoa New Zealand.

The Dental Council ('the Council') regulates oral health practitioners in Aotearoa New Zealand under the Health Practitioners Competence Assurance Act 2003 (HPCA Act).

The Council regulates:

- Dentists
- Dental specialists (12 disciplines)
- Oral health therapists
- Dental therapists
- Dental hygienists (that includes an orthodontic auxiliary scope of practice)
- Clinical dental technicians
- Dental technicians.

Currently, we have 5,700 registrants across these professions.

Our feedback to the consultation questions as follows:

1. [Who is making this submission?](#)

Dental Council.

2. [This submission is made by:](#)

Organisation – health regulator.

3. [Are you happy for us to contact you?](#)

Yes, you can contact us at consultations@dcnz.org.nz

Part A: Options for an updated occupation classification and our intention to introduce separate but aligned occupation classifications for Aotearoa New Zealand and Australia

4. What is your feedback on the proposal for a separate but aligned occupation classification?

The Council supports option 1, the Stats NZ preferred option presented. The proposal and rationale seems appropriate, and we have not identified any major concern.

It is important to have accurate and fit-for-purpose classifications for Aotearoa New Zealand, including recognition of te ao Māori or kaupapa Māori occupations.

The proposal facilitates more timely updates. The linkage to the Tahatū platform would improve user experiences, decrease duplication of effort, and limit the risk of discrepancies between information on different platforms.

Alignment to facilitate international comparison and data sharing is important. The consultation acknowledges this, and indicates review and alignment with the Australian classification where appropriate.

5. How do you currently use ANZSCO?

Not a direct user as our professions is defined in the HPCA Act. We recognise the importance of the classification for other users – such as Tertiary Education Commission, Immigration NZ etc.

6. What do you think about the four options outlined? What other options should we be considering?

We support option 1 for the reasons articulated under question 1.

7. Would this approach support your business/user needs? Please give examples of how this would or would not support them.

We do not have any direct use links to the classification system, including in any of our IT systems.

8. What do you think about the proposed new classification list and the changes from ANZSCO 1.3? What additions, deletions, or changes are needed?

We support the proposed flat structure, moving away from the hierarchical approach followed to date. Within the healthcare setting, it recognises that patient care is delivered by a team, all playing an important role in patient outcome.

For the oral health professions we regulate, we request the following amendments to the *Indication of potential changes to ANZSCO classification* worksheet to reflect the oral professions recognised in the HPCA Act.

a. Status of dental therapists and oral health therapists in New Zealand.

The list of potential changes proposed a rename of dental therapists to oral health therapists (row 741). This change will not accurately represent the professions.

Dental Therapist was a profession recognised in the HCA Act in 2003 and these professionals continue to practise in New Zealand. Oral health therapists is a new profession established more recently in 2017.

The oral health therapy profession was created after the education of dental hygiene and dental therapy was combined. Although no single-stream training now exists within NZ, both the dental hygiene and dental therapy professions continue to exist, with active registrants

working in these areas. Overseas trained dental hygienists and dental therapist also continue to enter the country and practice in these areas.

For this reason, dental hygienist (411211) and dental therapist (411214) must remain unchanged, and a new occupation oral health therapist be added.

- b. Dental prosthetic is an Australian title used. If we create a New Zealand specific classification, then this occupation title should be changed to reflect the profession as named in the HPCA Act - Clinical dental technician (row 739, classification code 411212).
- c. To recognise the status of the healthcare professions regulated under the HPCA Act, we propose to move all the regulated oral health professionals to the healthcare professionals category, similar to dentists and dental specialists (move from 411 category to the 252 code category).

In summary, this will mean the oral health professions be reflected as:

- Dental specialist (252311)
- Dentist (252312)
- Oral health therapist (new occupation to be added and 252 code)
- Dental hygienist (new 252 code)
- Dental therapist (new 252 code)
- Clinical dental technician (rename from Dental prosthetist and new 252 code)
- Dental technician (new 252 code).

9. What other potential views would you need?

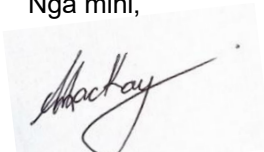
None identified.

We do not have any specific feedback on Part B of the consultation: Implementation considerations, concerns, and mitigations.

We appreciate the opportunity to be advised of the proposed changes, and look forward to the communication on the outcome of the deliberations.

We also welcome any further discussions on the proposed amendments suggested to the oral health professions' occupation classifications.

Ngā mihi,



Marie MacKay

Chief Executive