



# ROYAL AUSTRALASIAN COLLEGE OF DENTAL SURGEONS

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## Accreditation Arrangements Submission Attention: Practitioner Regulation Subcommittee

By email to [nraip@dhs.vic.gov.au](mailto:nraip@dhs.vic.gov.au)

### INTRODUCTION

The Royal Australasian College of Dental Surgeons welcomes the opportunity to comment on this most recent consultation paper and the proposed arrangements for accreditation. To provide the Practitioner Regulation Subcommittee with some understanding of the purpose and function of the College within the dental profession, we refer you to the following brief outline.

The College was established in 1965 on the initiative of several entities including the Australian Dental Association to promote professional development in general dentistry. Examinations for Fellowship commenced in 1968.

Entry to the College is via a two-part Examination open to dentistry graduates throughout the world. These consist of the Primary Examination covering the basic dental and medical sciences and the Final Examination which assesses knowledge of General Dentistry and an elective area within dentistry. Success in the examinations leads to admission to the College and award of the qualification FRACDS, Fellowship of the Royal Australasian College of Dental Surgeons.

The Primary Examination of the College has become widely respected, and is used by a number of Universities as part of their entry requirements for students seeking to undertake postgraduate specialist dental programs (Masters and Clinical Doctorates).

The College is attracting a number of graduates from South East Asia, the Middle East and the Indian sub-continent. Examinations are now conducted in various regional centres including Sydney, Melbourne, Adelaide, Perth, New Zealand, Hong Kong, Singapore and will this year include Malaysia for the first time. Approximately 160 candidates from 16 countries apply each year to sit the examinations. The College maintains a high standard of academic excellence and its examination is seen to be fair and impartial.

Fellowship in the General Stream of the College is recognised by dental registration authorities as a further qualification, but on its own, it does not gain registration to practise dentistry in Australia or New Zealand.

In 1972 the College introduced advanced level examinations, initially in Oral and Maxillofacial Surgery and later in Prosthodontics, Endodontics, Orthodontics, Periodontics, Paediatric Dentistry, Special Needs Dentistry and also Oral Medicine. These examinations lead to Fellowship in the particular specialty FRACDS(Special Field).

The advanced training in Oral and Maxillofacial Surgery has been accredited by the Australian Dental Council and the Australian Medical Council and on this basis is recognised by all dental registration boards throughout Australia. In addition, this specialist

qualification is recognised by the federal government for the purpose of Medicare benefits. As from 1996 all candidates for this training must hold a medical degree registered in Australia or New Zealand in addition to a recognised dental degree.

The College is governed by a Council of 12 Fellows (including 2 regional councillors elected only by Asia and New Zealand respectively) who is elected for a two year term of office by the general membership. The education business of the College is undertaken by Fellows and non Fellows appointed to various boards and committees of the Council, supported by College staff in the College office located in Sydney.

The College has Regional Committees in NSW, Qld, Vic, SA, WA, NZ, UK, HK and Singapore, which are responsible for supporting candidates and holding regular scientific meetings. Convocation of the College, held every two years, is the principal scientific meeting and the main formal occasion of the College, including the induction ceremony for admission of new Fellows and Members.

The College has recently introduced a program for the new qualification Membership of the RACDS in both general practice and within the relevant specialty field. For dentists in general practice and it is based on involvement in a structured program of continuing education and associated written assessments and viva examinations over a two year period. For dentists in specialist practice or completing postgraduate studies in a specialist field the College recognises those individuals who have successfully attained their postgraduate qualification in that specialty

Further details are available on the College Web Site at <http://www.racds.org>.

## **ACCREDITATION**

As a stakeholder who develops standards and provides examinations for the dental profession, the College is very interested in the scope of the proposed accreditation functions. In particular, the accredited training program in Oral and Maxillofacial Surgery which is administered by the College, highlights a direct impact on the College with any future arrangements concerning both the implementation of assignment to existing accreditation bodies and arrangements for conduct of accreditation matters.

With the establishment of the Ministerial Council (or in the event that the Ministerial Council has not been established, by AHMAC) the College would see strong benefits in the existing accreditation bodies meeting standards and criteria set by the national agency.

Currently, the training program in Oral and Maxillofacial Surgery is conjointly accredited by the Australian Dental Council and the Australian Medical Council. Whilst both accrediting bodies have worked diligently to enable a certain level of standard reporting and accreditation to be undertaken, there are certainly many advantages to the development of mechanisms to foster collaboration and consistency of processes across all profession-specific accreditation committees.

## **LINKAGES**

The Australian Dental Council and the Australian Medical Council, who are the current accreditation bodies for the dental profession and medical registration boards respectively, conduct skills assessment of overseas trained dental and medical graduates intending to apply for migration to Australia under the Australian Government's General Skilled Migration program.

The College undertakes this assessment process for the Australian Medical Council for International Medical Graduates and provides recommendations to the AMC. The applicant

is referred directly to the College who undertakes the assessment and interview for a fee which is incurred by the applicant.

In the case of the Australian Dental Council, the College has nominees on the Specialist Assessment Panel of the ADC.

The College is eager to assist in this capacity and feels it has appropriate skills assessment processes in place to support both Councils. The College recognises that the accreditation body has the ultimate responsibility to make recommendations to the regulatory authorities, however the expertise in assessing relevant skills for each specialty is within the scope of the College.

***Under the new national legislation would there be provision for this supporting role to continue and will the accreditation body have the authority to delegate such responsibility?***

## **PROPOSED NEW ACCREDITATION ARRANGEMENTS**

Under the national scheme and in accordance with the objectives of the IGA, the board may submit the standards to the Ministerial Council with a recommendation for approval. Given that the Ministerial Council will have no power to intervene in registration or examination decisions relating to individuals or decisions relating to the accreditation of individual courses, the College would support that the national boards would ensure that these approved standards are the framework within which the accreditation bodies would operate.

Whilst these external accreditation bodies will be independently constituted organisations, it is also not unreasonable to assume that positions within the accreditation bodies will contain individuals with a background or expertise in education and training. As such, it is important to segregate the operational activities of the accreditation working committee from the senior appointments to the accreditation organisation. In other words, ensure conflict of interest does not arise through institutional nominees.

## **SCOPE OF ACCREDITATION**

The range of postgraduate studies within dentistry is extensive with Masters or Clinical Doctorate qualifications offered across Australia in Periodontics, Orthodontics, Prosthodontics, Endodontics, Paediatric Dentistry, Oral Medicine Special Needs Dentistry and Oral and Maxillofacial Surgery. The College recognises the attainment of these qualifications (with the exception of Oral Maxillofacial Surgery which is an accredited training program leading to the award of FRACDS (OMS)) with the awarding of MRACDS in the relevant specialist field, namely MRACDS (Perio.), MRACDS (Ortho.), MRACDS (Pros.), MRACDS (Endo.), MRACDS (Paed.), MRACDS (Oral.Med.) and MRACDS (SND).

This highlights the importance that the College places on the registration of specialists within dentistry and the ongoing professional development pathways that are provided for Fellowship.

### ***Recognition of specialties and accreditation of specialist training***

#### *Proposal 3.4.1 and 3.4.2*

The College considers that it is essential that the national board for dentistry endorse the university qualifications for specialists as the recognised qualification for registration. The exception to this would be the Oral and Maxillofacial Surgery training program which is currently accredited by the Australian Medical Council and the Australian Dental Council and which is recognised by all dental registration boards throughout Australia.

*Proposal 3.4.3*

The College would support this proposal with the understanding that recommendations for approval by the Ministerial Council would come from the national registration board.

**Core accreditation functions***Proposal 3.4.4*

The College supports this proposal.

*Proposal 3.4.5*

The College supports this proposal.

*Proposal 3.4.6*

The College supports this proposal.

**Additional functions relating to the national scheme***Proposal 3.4.7*

The College would support this proposal, however would expect further consultation should issues such as continuing professional development or approval of courses be considered as a delegated function to the external accreditation bodies.

**Governance arrangements for external accreditation bodies**

The College notes that the governance arrangements of external accreditation bodies will need to provide for community input and promote input from education providers and the professions but provide independence in decision making.

Expertise and relevance within the profession will require individuals who are actively involved in academia to address accreditation standards and surrounding issues. Accreditation bodies will need to demonstrate independence and removal from direct involvement in accreditation reviews and reporting. In addition, consumer and legal representation would encourage a broader cross section of thinking in relation to the community needs and workforce shortages.

*Proposal 3.5.1*

The College supports this proposal.

*Proposal 3.5.2*

The College supports this proposal, however would encourage terms and conditions of the contract between the agency and the external accrediting body to have a review period of not more than 3 years.

*Proposal 3.5.3*

The College supports this proposal.

*Proposal 3.5.4*

The College supports this proposal.

*Proposal 3.5.5*

Where the external body assigned to undertake accreditation will have the ability to delegate parts of the accreditation function to other agencies, the College would expect that such agencies will be required to demonstrate the ability to perform accreditation functions to a documented standard or set of guidelines established by the external body.

## **Ensuring transparency**

### *Proposal 3.5.6*

The College supports this proposal.

### *Proposal 3.5.7*

The College supports this proposal.

### *Proposal 3.5.8*

The College supports this proposal.

## **Accreditation Committees**

### *Proposal 3.6.1*

The College supports this proposal should the accreditation not be assigned to an existing accreditation body.

### *Proposal 3.6.2*

The College supports this proposal should the accreditation not be assigned to an existing accreditation body.

### *Proposal 3.6.3*

The College supports this proposal should the accreditation not be assigned to an existing accreditation body.

## **Administration**

### *Proposal 3.6.4*

The College supports this proposal.

## **LINKAGES**

### **Review and appeal provisions**

#### *Proposal 3.7.1*

Where an organisation is disadvantaged by an accreditation decision of the Board, the College wishes to know what budgetary provisions will be made to accommodate the expenditure of such a merit or process review and what guidelines will be proposed.

## **INDEMNITY**

### *Proposal 3.8.1*

The College supports this proposal.

## **ACCREDITATION PROCESSES**

### *Proposal 3.10.1*

The College supports this proposal.

Relationship between registration and accreditation processes

### *Proposal 3.10.2*

The College supports this proposal.

## **LINKAGES WITH COMMONWEALTH, STATE AND TERRITORY GOVERNMENT BODIES**

### *Proposal 4.1*

The College supports this proposal.

## **INTERNATIONAL LINKAGES**

### *Proposal 5.1*

The College supports this proposal.

## **TRANSITIONAL ARRANGEMENTS**

### Proposal 6.1

The College supports this proposal, however suggests that there be consideration to the process for any new courses requiring accreditation subsequent to 30 June 2010 under the new provisions. New course or providers will require adequate time to align education and training with the standards developed under the national scheme.

## **CONCLUSION**

The College thanks the Practitioner regulation Subcommittee for the opportunity to comment on the Consultation Paper, 6 November 2008 and looks forward to reviewing the proposed arrangements for accreditation in the future.

*End document*