



**Victorian Dental & Oral Health  
Therapist Association Inc**

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## **Registration Arrangements Submission**

Attention: Practitioner Regulation Subcommittee

The Victorian Dental & Oral Health Therapist Association would like to make particular comments on following issues raised in this discussion paper.

### **3. Regulated professions**

In table 1, under the Division of this register of Dental care practitioners – Divisions of register - we would suggest that the division list as follows:

- Dentists – Division 1
- Oral Health Therapist – Division 2(a)
  - Dental hygienists – Division 2(b)
  - Dental therapists – Division 2 (c)
- Dental Prosthetists – Division 3

States that provide course for the education of dental therapists, dental hygienist and oral health therapists are now in the large, only offering a dual qualification degree. Many registered dental therapist also hold a dental hygiene qualification and currently have to hold dual registration. To allow for dual trained registration the Oral Health Therapist division should be the over arching classification and single trained classifications be a sub-division

#### **4.1 Application for registration**

Fees for Oral health therapist, dental therapists or dental hygienist should be kept at a much lower rate than that for a dentist. The earning capacity, due to the limited scope of practice, is much lower for these professions

#### **4.2 Information required on initial application**

**a)** Appears to require an applicant to show evidence of *supervised experience*. Dental therapists do not work under the supervision of a dentist so this would be difficult to show. If this refers to students then this would be covered in section (e)

### **4.3 Criminal history checks**

VDOHTA supports the Option 2 – that would require criminal history checks on all new applicants and at renewal of registration. We understand that these would be phased in over time. We feel that if criminal checks are done in the interest of public safety then they should be mandatory for all registered practitioners, both new and renewing applications.

### **5 Qualifications for registrations**

However the legislation is worded, it must not allow for Boards to give registration to persons who have not trained in the relevant qualification. Our example would be that dentists trained overseas, should not be allowed to practice as an oral health therapist, dental therapist, dental hygienist or dental prosthetist.

### **6 Professional Indemnity Insurance**

VDOHTA feel that in the interest of public safety, it should be mandatory for all registrants be able to show that they have appropriate PII. We agree with Proposal 6.3.1.

### **7 Student Registration**

In the interest of public safety, it should be mandatory for students who have dealing with the public hold a student registration. We agree with Option 2

### **8 Title Protection**

It is most welcome, that the title oral health therapist becomes protected within Australia as many Universities are graduating students with bachelor degrees in oral health therapy, which covers dual qualifications of both dental therapy and dental hygiene qualifications.

### **9 Dentistry practice restrictions**

The practice of teeth whitening and bleaching has become an area of concern of many dental care practitioners due the caustic nature of some of the products being used. Whilst the current legislation in Victoria indicates:

*"Performance of any invasive or irreversible procedure on the natural teeth or the parts of a person's body associated with their natural teeth;"*

There are a number of "beauty" salons providing treatments to teeth. VDOHTA would like to see a similar addition to the restricted acts in line with current Victorian legislation

## **9.2 Continuing Competence requirements**

The VDOHTA agrees with Proposal 9.2.2. In the interest of public safety some areas of continuing competence such as Infection Control and Resuscitation are needed across all areas of the health professions. A minimum stand approach should be applied and also the ability of Boards to refuse or restrict practice until there has been compliance.

## **11 Other Matters**

### **11.1 Duration of registration**

VDOHA are of the opinion that to have a national registration timeframe of one year would be most effective commencing from the time of initial application. With modern technology it become easy to identify when a practitioner is needing to re-register, and would also avoid "rushes" on practitioner offices to have all the paperwork completed on a particular date.

### **11.2 Registration Certificates**

For transparency of information for the public annual Certificates of Registration should be issued.

### **Proposal 11. 2 .4 – Address alteration**

For a practitioner who is not supplying the Board their correct contact address there should be a reasonable timeframe to do so and penalty for non-compliance.

Thank you for the opportunity to submit our comments

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