



Preliminary consultation on draft registration standards

25 October 2013

Responses to consultation questions

Please provide your comments in a **word document** (not PDF) by email to dentalboardconsultation@ahpra.gov.au by close of business on **23 December 2013**.

Stakeholder Details

If you wish to include background information about your organisation please provide this as a separate word document (not PDF).

Organisation name
SA Dental Service
Contact information <i>(please include contact person's name and email address)</i>
Dr Geoff Franklin Executive Director SA Dental Service GPO Box 864 ADELAIDE SA 5001

Your responses to consultation questions

<p>Registration standard: Criminal History</p> <p><i>Please provide your responses to any or all questions in the blank boxes below</i></p>
<p>1. From your perspective how is the current Criminal History registration standard working?</p> <p>SA Dental Service considers the current registration standard to be suitable for its purpose.</p>
<p>2. Are there any state or territory specific issues or impacts arising from applying the existing Criminal History standard that you would like to raise with the board?</p> <p>SA Dental Service reiterates its requirement to comply with all SA Health Directives. Currently this includes requirements for criminal offender checks and clearance certificates for all staff including students. This practice has been in place for some years and has worked effectively and not proven to be too onerous for prospective employees.</p> <p>State jurisdictional directives determine the "specific" requirements of criminal offender checks.</p> <p>SA Dental Service will continue to be compliant with its state jurisdictional requirement for all new employees to supply full Criminal Certificate Clearances as a condition of employment.</p>
<p>3. Is the content of the registration standard helpful, clear and relevant?</p> <p>SA Dental Service considers the standard is clear and well structured.</p> <p>SA Dental Service reiterates that it is required to comply with state directives which also determine the "specific" requirements of criminal offender checks. The potential exist for there to be variation between the AHPRA registration standard and the state specific checks. For example the State requirements may be more comprehensive than the 10 factors listed in the 'requirements' section of</p>

Registration standard: Criminal History

Please provide your responses to any or all questions in the blank boxes below

this standard.

4. Is there content that needs to be changed or deleted in the registration standard?

No content changes have been identified by SA Dental Service.

5. Is there anything missing that needs to be added to the registration standard?

SA Dental Service notes the scope of application that *"this standard applies to all applicants and all registered health practitioner, it does not apply to students."* SA Dental Service is required to comply with state jurisdictional requirements whereby all students are required to provide undergo a criminal offender checks. SA Dental Service would suggest the inclusion of students in the scope of application of this registration standard.

6. Do you have any other comments on the registration standard?

Nil

Registration standard: English Language Skills	
<i>Please provide your responses to any or all questions in the blank boxes below</i>	
1. From your perspective how is the current English Language Skills registration standard working?	SA Dental Service considers the current English language skills registration standard to be working.
2. Should the countries recognised in the standard be consistent with those countries recognised by the Department of Immigration and Citizenship for exemptions from English language testing? If so, should the recognition of South Africa in the National Boards' English language Skills registration standard be phased out over time?	SA Dental Service has had limited exposure to the issues associated with language testing but would not anticipate any concerns if the countries recognised in the standard are e consistent with those countries recognised by the Department of Immigration and Citizenship for exemptions from English language testing. As an organisation that currently employs practitioners from South Africa that have had no significant issues relating to language skills SA Dental Service would expect no concerns with the alteration to exempt South African applicants from undertaking the English language skills testing.
3. Is there any evidence to assist National Boards to assess whether there are any additional countries that should be recognised in their English language skills registration standard?	SA Dental Service experience in this area is very limited, therefore would not be in a position to provide comment.
4. Do you have comments about how the National Boards should approach test results that are very close to, but slightly below, the current standard?	SA Dental Service experience in this area is very limited, therefore would not be in a position to provide comment. The only expectation of the organisation is to highlight the importance and expectation that health practitioners would have of suitable skills in the areas of listening, reading, writing and speaking to ensure the safety of patients in the provision of care.
5. Should National Boards accept results from more than one sitting or is there a better way to address this issue, such as the approaches described above?	SA Dental Service experience in this area is very limited, therefore would not be in a position to provide comment.
6. Is the content of the draft revised registration standard helpful, clear relevant and more workable that the current standard?	SA Dental Service considers the draft revised registration standard to be workable.
7. Is there content that needs to be changed or deleted in the revised draft registration standard?	Nil
8. Is there anything missing that needs to be added to the revised draft registration standard?	Nil
9. Do you have any other comments on the revised draft registration standard?	Nil

SA Dental Service supports the adoption of Option 2 and acknowledges the potential benefits and costs of the proposal as outlined in the consultation paper.