



Email: practice.consultation@ahpra.gov.au

This submission is made by the Dental Hygienists' Association of Australia Inc. in consultation with the all the State branches of the DHAA.

“Public consultation paper on the definition of practice”

Question 1:

Are there any other factors that the National Boards should consider when advising whether or not a person needs to be registered?

- Any position that is found to have the potential to directly or indirectly impact the “safe, effective delivery of services in the profession” should require registration to ensure that decisions are made using knowledge based on current information and standards of ‘best practice’.

Points to consider:

- We consider that registration is essential when the health professional is presenting information as part of delivery of mandatory CPD hours.
- Any health care practitioner who touches a patient **must** be registered. This should apply to dental assistants, a dental assistant who is certified in radiography and in the delivery of oral hygiene instruction, are in direct clinical contact with a patient and are most certainly practicing within their profession.
- Registration **must** be considered for these certified dental assistants.

Question 2:

Do you support this statement? Please explain your views:

Yes. We support the statement.

- The provision of health care, treatment or opinion about the physical or mental health of an individual is associated with a level of risk to the public and therefore it should be expected that health practitioners have the contemporary knowledge and skills to provide this care in a safe and effective manner.
- It is our opinion that requiring practitioners to meet registration standards can help to achieve this outcome.
- Non practicing registration should require compliance with Compulsory Continuing education and indemnity insurance but not recency of practice



Question 3:

Do you support this statement? Please explain your views:

Yes. We agree with this statement.

- The actions of directing, supervising or advising is associated with having the potential to influence the management of the patient/client by the practitioner being advised.
- The direction, supervision or advice given must therefore be based on contemporary knowledge and skills to ensure the “safe, effective delivery of services”.
- Educators and supervisors should be compliant with all registration requirements
- Acknowledgement of potential influence which indirectly affects patient care.

Question 4:

Do you believe that health practitioners in non-clinical roles/ non-patient-client care roles as described above are “practicing” their profession? Please state and explain your views about whether they should be registered and if so for which roles?

- A person who uses their professional skills and knowledge as a health practitioner in any role (including those which are non-clinical / non-patient-client care) is to some degree ‘practicing’ their profession and therefore should meet registration standards of the following categories:
 1. Continuing professional development
 2. Indemnity

These are essential to ensure the “safe, effective delivery of services in the profession”, including non clinical services.

- Certain aspects of practice must be maintained to allow involvement in such non clinical roles. In all the listed examples, the requirement to advise on matters pertaining to practice may continually arise.
-



Question 5:

For which of the following roles in education, training and assessment should health professionals be registered?

- It is our opinion that all of the listed roles in education should require full registration to ensure that students receive instruction from individuals who meet registration standards for both recency of practice and professional development in order to ensure the “safe, effective delivery of services in the profession”.
- Any position/role which can impact in any way on a student or graduate’s treatment of patients should require full registration.

Are there any other settings that are relevant and, if so, what are your views about whether health practitioners should be registered to work in these settings?

- Extensive consultation with all stakeholders would be advisable to identify any other such settings. Following this, specific decisions could be made relating to types of registration required for those settings or circumstances.
 - Points to consider:
 - Some non registered health workers, who are highly skilled and trained in their areas of expertise, have historically been involved in education and training of health professionals. Examples are dental assistants who have OH & S and Infection Control qualifications, instructing undergraduates and post graduates in latest techniques and protocols; and dental technicians instructing undergraduates in tooth morphology, and post graduates in specialised techniques.
 - Businesses who provide CPD as their main service:
May need to register overseas trained professionals who visit as guest speakers;
At the other end of the spectrum must provide fully compliant CPD information, and ensure it is delivered by current qualified and registered practitioners
-



Options for Consideration:

Option 1 (No Change):

Do you support this option? Please explain your views:

Consultation between States varied from support of Option 1. And a need for an alternative definition however there was no support of Option 2.

- Clearly defines all of the activities, circumstances and settings in which a health practitioner may work, leaves little room for misinterpretation and ensures the highest standards of care and safety.

Option 2 (Change the definition to emphasise safe and effective delivery of health care):

Do you support this option? Please explain your views?

We do not support option 2.

- The definition lacks specificity and may therefore be open to misinterpretation or misuse, thereby posing a potential threat to the provision of safe and effective care.

Other Options:

There may be situations when a limited or partial registration may be appropriate.

See responses to Questions 1 and 5 above.

- Non – Practising registration should not be limited to those who have ceased practice but rather be expanded to include those providing service and advice within the health profession (Dental Assistants: in direct delivery of service, radiography, and Fluoride applications and impression taking.
- It is not intended to prevent valuable mentors and retired colleagues from providing essential knowledge or experience or prevent retired colleagues from delivering CPD to accredited organisations and associations delivering CPD to members and oral health professionals

H Checker

NATIONAL PRESIDENT