



Australian Dental Prosthetists Association
Queensland Inc.
PO Box 1943
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Mr Trevor Ruthenberg MP
Chair, Health and Community Services Committee
Parliament House
George Street
Brisbane Qld 4000

18 December 2012

Sub # 1
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HEALTH AND COMMUNITY
SERVICES COMMITTEE

Dear Mr Ruthenberg

Health Practitioner Registration and Other Legislation Amendment Bill 2012

Thank-you for the opportunity to provide a submission on the Health Practitioner Registration and Other Legislation Amendment Bill 2012.

The Australian Dental Prosthetists Association of Queensland (ADPAQ) is a not-for-profit association and represents around 250 Dental Prosthetists in Queensland. The vast majority are small business owners and many employ additional staff including Dental Technicians, Patient Service Officers and Administrative Assistants. Around 20 Dental Prosthetists are employed within Queensland Health's Oral Health Service.

Dental Prosthetists are registered Dental Practitioners under registration arrangements administered by the Dental Board of Australia. Dental Prosthetists' scope of practice includes *'making, fitting, supplying and repairing removable dentures and flexible removable mouthguards'*. The services provided by Dental Prosthetists, within their scope of practice, are identical to those provided by dentists.

Prior to enrolment in a program of study towards a Dental Prosthetist qualification, a person must have completed a relevant Dental Technology course plus a specified period of full-time work as a Dental Technician.

Dental Technician's scope of practice includes the design, fabrication, maintenance and repair of dental prosthetic appliances such as complete and partial dentures, fabrication of inlays, onlays, veneers, crowns and bridges, fabrication of mouthguards, occlusal splints, medicament trays and stents and fabrication of appliances used in orthodontics, oral and maxillofacial surgery and other special areas of dentistry

The Bill:

The Association notes the decision of Cabinet to cease the registration of Dental Technicians and that this Bill will give effect to that decision.

It is the Associations view, however, that Dental Technician's should continue to be registered in some form for the following reasons:



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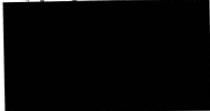
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- The dental prosthetic appliances (prosthesis) manufactured by Dental Technicians (see above) are made exclusively to patient-specific prescriptions prepared by Dental Prosthetists or Dentists.
- There is therefore a direct, identifiable and individual connection between the prosthesis manufactured by a Dental Technician and a patient. Dental Technicians have significant responsibilities for the design and manufacture of the prosthesis.
- Dental Prosthetists and Dentists are required to be registered with the Dental Board of Australia and can be held accountable for the safety and quality of the prosthesis and services they provide.
- Dental Technicians do have direct contact with patients during the 'shade taking' process (determining the natural colour of a patient's teeth).
- The safety and quality of the prosthesis produced by Dental Technicians is therefore inseparable from the obligations of Dental Prosthetists and Dentists to provide safe and quality prosthesis to their patients.
- The cessation of the registration of Dental Technicians removes the ability of a registration authority to hold Dental Technicians accountable for their actions in regards to any adverse patient outcome.
- The cessation of the registration of Dental Technicians would also appear to be inconsistent with the regulatory regimes of many countries where Dental Technicians continue to be registered. The Association understands that these countries include New Zealand, United Kingdom, and Canada, various States of the United States of America, South Africa, Netherlands, Germany and Ireland.

For these reasons and in the interests of protecting patient health and safety, and ensuring high quality standards in the fabrication of prosthesis, Dental Technicians should continue to be registered in Queensland.

The Association has no specific comment on the specific clauses in the Bill.

Yours sincerely



Neda Nikolovski
President