



Consultations

Dental Council

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Submission: Consultation on proposed 2024/25 budget, fees and levies

The Association's Board thanks you for the opportunity to comment.

1. Exams and registration of non-prescribed overseas applications

The Association supports the proposed cost recovery basis for exams and registration of non-prescribed overseas applications. These costs should be completely carried by the applicants and not subsidised by current APC holders.

2. Return of reserves

The Association supports the intention to return reserves from previous surpluses in recent financial years to APC holders.

3. New projects - overall

There is a lack of detail of costs of both the "Te Tiriti based regulator" project, and the proposed new registrant recertification programme. For example, what are the budgeted \$333.9K Te Tiriti project costs comprised of? Are these new projects expected to be ongoing items of expenditure in future years, and if so at what level of budgeted expenditure? Are they front loaded (expected to diminish over time) or projected to increase over time?

4. New projects – new registrant recertification programme

In referencing new registrants, is Council referring to graduates from New Zealand courses accredited by Council? If so, the considerable focus on cultural safety in these courses would assume recent graduates are already culturally safe and competent. Why is there a perceived need for recertification immediately post-graduation? The Association believes this will be an unnecessary cost for new graduates. On another note, there is a real potential for conflict of interest if the body responsible for determining standards of competence is also the body that is running a compulsory recertification programme to meet those standards. What is Council's plan for mitigating this conflict?

5. New projects – cultural safety and improving equitable health outcomes

It has been agreed that Council be responsible for setting the standards of practice with professional associations delivering practical guidance on compliance with these standards. In stating Council's intention to develop a "kete (basket) of resources to support practitioner learning", is Council signaling a move towards providing guidance documents as well as the standards now? If so, will this now be for all other standards?

6. New projects – review of standards

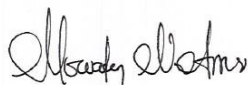
The Association would be appreciative of a timeline for these reviews to provide timely practical guidance on compliance.

7. Council project and profession expenses

Notably forecast to increase to \$3,982,651 in 24/25 budget up by \$973,325 (32.3% increase on 23/24 budget) and up by \$2,283,047 increase on 22/23 actual (134.3% increase). With no reporting on the progress that the Council may have made on these projects, these significant jumps in spending funded by the professions are concerning. The Association would appreciate more transparency in reporting the outcomes of this spending.

Overall, the increase in Council project and profession expenses are significant when compared to 22/23 actuals. While it can be argued that organisations are emerging from a post COVID environment and work backlogs have developed, can Council realistically expect to deploy four major projects with additional budget impact of around \$1M (20% of the organisational activity) in the context of a \$5M organization? While scale wise this might be seen as possible, four major projects on top of 'business as usual' and notable increases in the volume of competence assessments and reviews and registration activity (based on budget) would appear ambitious. If the funds are to be levied to practitioners, for all four projects in the 2024/25 years then early planning and scaling up would be expected to see delivery in 2024/25.

Yours sincerely,



Dr Mo Amso

Chief Executive

NZDA