

## **Recertification**

---

**From:** Jennifer Nicholls [REDACTED]  
**Sent:** Wednesday, 24 October 2018 6:18 p.m.  
**To:** Recertification  
**Subject:** Proposed changes to certification

**Thank you for the opportunity to make a submission regarding the Dental Council proposal for new rules on recertification.**

**Having attended the meeting run by Dr Wyman in Christchurch I shall list below my concerns re the new proposals.**

**Firstly I feel that the new proposals are more about compliance rather than a practitioner's competency. Complying to the regulations does not provide the public with any more assurance of a practitioners competence in dentistry than the current regulations do. Yet we are told this is the reason for bringing in these new regulations.**

**I feel that the Dental Council is being driven by outside influences to make changes to the existing system without concrete evidence that the changes will result in an increase in the competency of practitioners. None of these proposals have been brought in by overseas Dental regulatory bodies yet, so wouldn't it be prudent to wait for scientifically proven evidence to be provided by other countries using similar regulations first.**

**This proposed new system is also very subjective.**

**At no time in the meeting did I hear that there is a problem with the existing system, in fact the presenter acknowledged that very few dentists are an issue for the council and most of those that are are identified using the current system. However they would like to introduce all these new regulations to perhaps catch the 1% that currently slip through (again there is no evidence that this will be the case). This seems a gross over reaction to the actual problem and adhering to these new regulations will place an enormous burden on**

**the vast majority of dentists who already treat their patients with great care, competency and respect.**

**I am also very concerned about the proposed annual reviews. I feel that the proposed annual cycle is far too short.**

**Any dentists that, for whatever reason, take months off will find it almost to impossible to fulfil the compliance requirements. Soon the Dental workforce will be more than 50% female, the majority are young and many of whom will wish to take time out to have and care for children. The government entitlement for maternity leave is one year but by definition, in your proposed regulations, these women (or men) will be automatically deemed non compliant, as how can they improve their competency as a dentist when they are not practicing. Even if they make a plan during this intensive and demanding time of life to improve an aspects of their dentistry, how can they in any way implement these intentions. It is also very difficult and expensive for them to meet the CPD requirements. Again by definition they will be deemed non compliant and denied a practicing certificate. Then they face the even more burdensome task of reapplying for a practicing certificate.**

**I put it to you that this is a huge deterrent for these dentists to return to practice and the industry will face a huge manpower shortage of New Zealand trained dentists.**

**It is also inconceivable that a dentist suddenly becomes incompetent just because they have taken a year off from practicing. A 2-3 year cycle would be much more appropriate.**

**My next concern is the bureaucratic and time burden these new regulations will place on all practitioners but especially part time practitioners. Many of our workforce work part time and the burden of these intended regulations may be a real deterrent to them to continue practicing, again resulting in the loss of very valuable professionals and again a probable shortage of New Zealand trained dentists. New Zealand graduates are obviously the best suited for meeting the needs of New Zealander's without additional training or certification.**

## **Peer Review:**

**This seems totally subjective and open to all sorts of problems and abuse.**

**Who chooses who reviews whom?**

**What if there are personality or professional opinion differences or worse still clashes?**

**What if the peer reviewing his/her colleague has lower or vastly different standards to their colleague?**

**Again this highly subjective system provides no assurance any practitioner will or needs to improve their competency.**

**This system will not promote support among colleagues. Rather it may foster an environment of mistrust and distance us from our colleagues. This surely is not desirable.**

**Again the annual attestation period is too short.**

## **PDP and PDA:**

**There seems to be a lack of clarity in the criteria.**

**It is impossible to plan professional development over a long period when we are only given short notice of up coming courses.**

**The quality and content of courses is most often driven by Dental Supply Industry and is often biased towards selling us a product.**

**Hence there is not a wide range of topics available to practitioners.**

**The Open Book test is unlikely to protect the public from incompetent dentists.**

## **Support for new Registrants:**

**The current system seems to work well.**

**Who will be mentors?**

**In short I feel the proposed changes are over complicated, unproven, and will put huge burden and additional stress on dentists who practice in a profession that is already very challenging and stressful.**

