Page 2: Information about the person or organisation completing this submission

Q1 This submission was completed by:

Name	**Peter Ritchie**

Q2 Are you making this submission   **as a registered practitioner**

Q3 Please tell us which part of the sector your submission represents   **a registered clinical dental technician**

Page 3: Area one: new core recertification programme

Q4 What, if anything, do you like about our proposed core recertification programme?

Mentoring is a good way to get new graduates integrated into the industry.

Q5 Is there anything about our proposed core recertification programme you would change?

Yes,
Please explain.:
Peer reviewing and professional development plan. This is a totally flawed plan that will not achieve the desired outcomes. It will lead to friends and group practices closing ranks and just signing each other off. Solo practitioners and people in remote areas will really struggle. It won't be a level playing field. What if your peer is unreliable, moves away, stops working, or you have a falling out. What responsibility does a new peer reviewer take on ? What are the effects on a peer if the practitioner doesn't complete their PDP plan ? Who determines what is relevant in a PDP plan ? Who is responsible for determining the relevance of a PDP plan ? If a practitioner fails to complete their PDP plan how will this impact on the reviewer, and will it reflect on their own reputation even if they complete their own PDP ? This is not going to prevent those practitioners slipping through the current system. It will add a huge amount of stress and compliance workload which is unnecessary.

Q6 Do you support our proposal to change the recertification cycle to 12 months?

No,

Please explain.:
This is totally unfair on practitioners who have time out during the year. For example, maternity leave, or an extended overseas trip, or time out, or caring for sick family. There needs to be much more flexibility and I think a 2 year cycle is a minimum.

Q7 Do you think our proposed core recertification programme should include a requirement for practitioners to complete an online open-book assessment of their technical and clinical knowledge and skills?

No,

Please explain.:
This is ridiculous. There are so many aspects to our industry and people specialise in different areas. A crown and bridge technician will have no idea about ortho or denture prosthetics or Chrome production and vice versa. Clinically what works in for one may not work for another. There are so many methods and materials and who's to judge them and say what's right or wrong. Our industry is half science half art. How does an open book assessment help. Anyone who can read will pass it.

Q8 If a proposal about an online open-book assessment of a practitioner's technical and clinical skills and knowledge is supported, how often should practitioners be required to complete an assessment?

Every five ,
years
Please explain.:
Actually never, It's not practical or achievable as for the reasons in the previous question.

Q9 Do you have other proposals about our proposed core recertification programme you would like us to consider? Please explain.

Just a few tweaks to the current format is all that's required. Perhaps the addition of some verified peer interaction.

Page 4: Area two: support for new registrants

Q10 What, if anything, do you like about our draft proposals for supporting new registrants?

mentoring is good.

Q11 Is there anything about the draft proposals for supporting new registrants you would change?

Yes,

Please explain.:
A fixed 2 years is too inflexible. Some new registrants may only need 1 year while others may need 3 years. There needs to be some personal discretion.

Q12 Do you think the proposed two year minimum period for the mentoring relationship is:

too ,
long
Please explain.:
As Previous comment.

Q13 Do you think all new registrants should participate in a mentoring programme, or are there some new registrants who should not be required to participate in a mentoring programme?

Yes,

Please explain.:

All new registrants would benefit.

Q14 Do you have other proposals about supporting new registrants you would like us to consider? Please explain.

No

Page 5: Area three: addressing health-related competence decline concerns

Q15 What, if anything, do you like about our draft proposals for addressing health-related competence decline concerns?

I think you don't need to do anything, it's already self regulating.

Q16 Is there anything about the draft proposals for addressing health-related competence decline concerns you would change?

Yes,

Please explain.:

Eye exams every 2 years is just more bureaucracy.
Practitioners already take care of their own eye health.

Q17 Do you have other proposals for addressing health-related competence decline concerns you would like us to consider? Please explain.

No

Page 6: Area four: addressing recurring non-compliant practitioner behaviours

Q18 What, if anything, do you like about our draft proposals for addressing recurring non-compliant practitioner behaviours?

The proposal looks good , to help repeat offenders raise their competence.

Q19 Is there anything about the draft proposals for addressing recurring non-compliant practitioner behaviours you would change?

No

Q20 Do you have other proposals for addressing recurring non-compliant practitioner behaviours you would like us to consider? Please explain.

No

Page 7: Final thoughts and comments

Q21 Do you have any other comments, suggestions or information you want to share with us about the draft proposals for improving our approach to recertification?

I think it's an unnecessary sledge hammer approach to cracking a small nut.This will make no difference to the very small proportion of our industry who are slipping through the gaps.The current system works well. Just increase the peer interaction within the current framework.