

4 May 2021

Marie Warner
Dental Council of New Zealand
Chief Executive
PO Box 10-448
WELLINGTON 6143

Dear Marie

Re: Follow-up consultation: proposed changes to the working relationship requirements for oral health practitioners with dentists, and the practising conditions for dental hygiene activities

Thank you for the opportunity to make a submission on the consultation above. Thanks to for all the work by Council on this issue.

The requirement for a professional relationship

1. Do you agree/disagree with the proposal to remove the mandated requirement for a professional relationship (dental therapy), working relationship (dental hygiene, orthodontic auxiliary practice), and a consultative professional relationship (oral health therapy) from the respective scopes of practice. Please detail why

Agree. These principles are covered in the existing Standards. Removal of these requirements will not prevent oral health professionals working together in a collaborative manner.

2. Do you agree/disagree to remove references to working/professional/consultative professional relationships from the dental therapy, dental hygiene, orthodontic auxiliary practice, oral health therapy, dental technology and clinical dental technology scopes of practice? (as detailed in Appendices A–F) Please detail why.

Agree. As per answer to Q.1

Practising conditions for dental hygiene activities

Within the context of the revised proposal to remove the scope of practice requirement for a working relationship for dental hygiene:

3. Do you agree/disagree with the removal of the requirement for direct clinical supervision for administration of local anaesthetic and prescription preventive agents? Please detail why.

Agree. Dental hygienists have the professional training and are capable of delivering local anaesthetic and applying prescribed preventive agents without direct supervision. They are also capable of responding to any emergencies, having had adequate training in this regard.

4. Do you agree/disagree with the removal of clinical guidance for the remainder of the dental hygiene scope activities? (excluding the orthodontic activities currently defined as being performed under direct supervision). Please detail why.

Agree. Dental hygienists have the scope and training to be able to provide treatment safely and are aware of the need to refer any patient whose treatment is out of their scope.

5. Do you agree/disagree to align the description of the following scope activity with current dental hygiene practice in the following way: obtaining and reassessing medical and dental oral health histories? Please detail why.

Agree. Dental hygienists are trained to assess medical and oral health histories relevant to their practice.

Thanks again for the opportunity to submit on this matter.

Yours sincerely

Riana Clarke

Riana Clarke
National Clinical Director-Oral Health
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