

14 March 2023

Ms Robyn Kruk AO
Independent Reviewer
c/o Department of Finance
GPO Box 9958
Melbourne VIC 3001

By email: HealthRegReview@finance.gov.au

Re: Review of regulatory settings relating to registration and qualification recognition for overseas health practitioners

Dear Ms Kruk

Thank you for considering the Australian Dental Association's (ADA) feedback on the consultation paper *Review of regulatory settings relating to registration and qualification recognition for overseas health practitioners* (review).

About us

The ADA is the peak representative body for dentists in Australia and an active member of the World Dental Federation. Our 17,000-plus members operate more than 7,500 small businesses across Australia. They include dentists who work across the public and private sectors, in 14 specialty areas of practice, in education and research roles, and dentistry students currently completing their entry-to-practice qualification.

The primary objectives of the ADA are to encourage improvement of the oral and general health of the public, promote the ethics, art and science of dentistry and support members to provide safe, high-quality professional oral care.

Context

In late 2022, the Australian Government appointed Ms Robyn Kruk AO to lead an independent review of the regulatory settings relating to health practitioner registration and qualification recognition for overseas trained health professionals and international students who have studied in Australia.

The review intends to deliver recommendations designed to ease skills shortages in health professions including nursing and midwifery, medicine, psychology, pharmacy, para-medicine and occupational therapy.

Senator the Hon Katy Gallagher, Minister for Finance notes 'the Review will help employers get the health practitioners they need and reduce compliance costs on employers and skilled migrants.'

General comments

We intend to limit our feedback to observations relating to dentists, dental assistants and other dental practitioners. Our impression is that the review appears focused mainly on other health professions. Nonetheless, we include brief discussion relating to our field, in case it is helpful for this review.

Dental workforce supply

Like other health professions, dental professions have experienced workforce maldistribution, especially in rural and remote areas.

We understand there has been recent increased demand from patients for dental services following the relaxation of movement and other restrictions that were imposed to restrain the spread of COVID-19 between 2020 and 2022.

The most recent study on Australian oral health workforce supply and demand we are aware of was published in 2014, suggesting limits to contemporary data availability that would inform the extent to which workforce supply is meeting patient demand. We recommend that health workforce studies like those run in the past by Health Workforce Australia be reinstated to allow professional bodies and government departments to make data-driven decisions. Inadequate contemporary workforce evidence exists across university-trained dental professionals to support any major reforms currently.

There is likely to be continued demand for dental professionals in Australia in the future. Australia's population is expected to continue growing, which suggests a greater demand for dental services. Additionally, as the population ages, there may be an increased need for dental care as older individuals are more likely to experience dental problems.

Dental assistant supply

In regard to dental assistants, the evidence is far clearer. ADA has advised the National Skills Commission (NSC) that it considers the occupation of dental assistant¹ to be in national shortage, in each Australian state and territory, in both regional and metropolitan areas.

Employment data we examined in 2022 indicated the total number of dental assistants employed nationally fell significantly following the outbreak of COVID-19. Employment levels appear to need to recover to levels around those prevailing in 2019 to meet current demand. But employers report difficulty in filling positions across the country – particularly in non-metropolitan areas.

The ADA is exploring opportunities to support enhanced supply of dental assistants, including the addition of this profession to the Australian migration skilled occupation list, to allow employer-sponsored skilled workers to enter Australia and supplement workforce needs. Reforms in this regard to assist with the shortage are highly recommended.

Dentist supply

There is a maldistribution of dentists in Australia, with certain areas having a higher concentration of practitioners compared to others. There are more dentists per capita in urban areas than in rural and regional areas. A key reason for this maldistribution is the high cost of setting up a dental practice, which can be prohibitive in rural and regional areas. In addition, there is often a lack of infrastructure and support services in these areas, making it difficult for dentists to establish a successful practice.

Feedback from our members suggests that a minimum population of around 6,000 patients within a catchment area, such as a town, is required to make financially viable the costs of setting up and operating a dental practice.

The ADA has advised the NSC that it considers the occupation of dentist to be in shortage in regional areas (only) of each Australian state and territory.

¹ ANZSCO classification 423211

Australian universities

So far as we are aware, Australian universities do not appear to be considering workforce requirements when deciding on student cohorts gaining admission to and completing programs. We understand that proportions of international to local students have increased in recent years, and that about half of international dental students return abroad following graduation.² The ADA understands tertiary dental schools are under pressure to meet budgets due to the high cost of providing dental education, and that full-fee-paying international students assist with this. There may be opportunities for tertiary institutions to enhance consideration of workforce requirements when determining student intakes, if funding to the dental academic sector was more adequately supported.

Overseas trained dentists

In select countries, qualification and registration requirements mirror those in Australia relatively closely. Dentists registered in those countries can have their qualification recognised and obtain registration in Australia in a reasonably efficient manner.

Dentists trained in countries other than those referred to above, must either complete an Australian qualification (anew) or pass a dental practitioner assessment process with the Australian Dental Council for registration with the Dental Board of Australia. This process involves the assessment of qualifications and professional skills, and is completed across three stages: initial assessment, written examination, and practical examination.

We hear from some candidates that they find the latter approach described above challenging, in terms of costs, processes, and success rates. Helping protect the health and safety of the public by ensuring overseas trained dental practitioners meet the high standards required of dental professionals in Australia is very important. Exploring how this can be achieved, while balancing the experience of candidates, is something the ADA would be pleased to contribute to.

The ADA is happy to discuss any of the comments provided. Should you have any questions, please do not hesitate to contact Mr Damian Mitsch, ADA Chief Executive Officer, at 02 8815 3333.

Yours sincerely,



Dr Stephen Liew
President

² As is their right, or obligation, depending on visa conditions.