

20 November 2024

Ms Deborah Frew
Executive Consultant
Miller Blue Group

By email: [REDACTED]

Dear Ms Frew

Re: Review of the use of the title “oral surgeon”

Thank you for inviting the Australian Dental Association (ADA) to provide a submission in response to the rapid review of the use of the title “oral surgeon” requested by Health Ministers. Ministers are seeking advice on whether the protection and use of the title:

- Provides for the protection of the public by ensuring that only health practitioners who are suitably trained and qualified to practice in a competent and ethical manner are registered;
- Facilitates access to services in accordance with the public interest;
- Enables the development of a flexible, responsive and sustainable Australian health workforce; and.
- Promotes public confidence in the safety of services provided by registered health practitioners, including patients and consumers. Understanding of the skills and qualifications of the practitioners providing their care.

As the terms of reference to the review acknowledge, the Health Practitioner Regulation National Law provides for the recognition of dental specialists and offers protection of their specialist titles. Both oral surgeons and oral and maxillo-facial surgeons are two of the 13 specialists recognised under this law.

As the peak body for dentistry, the ADA represents more than 17,000 members which include both oral surgeons and oral and maxillo-facial surgeons working across all sectors. It is therefore well placed to provide commentary for consideration in this review.

Oral and maxillo-facial surgeons (OMFS) are dually qualified dentists and medical practitioners. OMFS specialise in the diagnosis and treatment of diseases affecting the mouth, jaws, face and neck.

The Oral and Maxillofacial Surgery (OMS) Training Program of the Royal Australasian College of Dental Surgeons (RACDS) has been jointly accredited by the Australian Medical Council (AMC), the Medical Council of New Zealand (MCNZ), the Australian Dental Council (ADC) and the Dental Council of New Zealand (DCNZ) to deliver specialist medical and dental education, training and continuing professional development programs.

Oral surgeons diagnosis and surgically manage conditions affecting the oral and dento-alveolar tissues. They are dentists who have completed three years of additional training in order to meet the threshold for specialist registration. There is only one program of study accredited in Australia that produces graduates eligible for registration as oral surgeons: the Doctor of Clinical Dentistry at the University of Sydney.

International graduates of equivalent programs for either speciality are able to apply for specialist recognition but as per Australian specialists must also meet all the requirements of a general dentist.

The ADA believes that the scope of practice of each specialist is well defined and well understood by the profession and the community.

It should be noted that approaches to managing conditions of the oral and dento-alveolar tissues as this is within the scope of registered dentists.

Through our advisory and professional indemnity services, the ADA supports consumers with challenges either accessing care or when they are unhappy with the services they have received from a dentist or dental specialist as well as supporting our dentist members.

Through these services we have not received reports that there is confusion among the community or the profession about the difference in the scope of practice of either group.

Furthermore, we do not believe that there is any evidence through professional indemnity providers that oral surgeons have a high claims profile. In fact, the opposite is reported as they have a lower claims profile.

The ADA is concerned that any amendments to their title or scope could result in unintended consequences for patients.

1. Confusion between the role of a dentist and an oral surgeon.
2. Longer waiting times and higher costs for patients.
3. Decreasing interest in dentists seeking to train in the specialty reducing access for patients.
4. Closure of immigration pathways for oral surgeons trained in NZ, UK and specialist graduates from other recognised countries.

We hope that this information will assist with the preparation of your advice to ministers.

Thank you for your attention to this matter. Should you have any questions, please do not hesitate to contact

Yours sincerely,

Dr Scott Davis
Federal President