

A/Prof Dr Stephen Cox OAM *BDS, Dip B&M, MSc (Oral Path), FRACDS, FICD, PhD*
Oral Surgeon
Discipline Head of Oral Surgery

24 February 2025

Miller Blue Group

Re: Review of the use of the term ‘Oral Surgeon’

Thank you for your letter inviting my response regarding the use of the title “Oral Surgeon” in Australia, and to respond to specific questions directed from the enquiry.

The term ‘Oral Surgeon’ is a term which is used widely in the UK, the EU and more widely in the world.

I am writing as Associate Professor of Oral Surgery in the Sydney Dental School, in the Faculty of Medicine and Health at the University of Sydney. As such I am the Director and Lead for the University of Sydney of the Oral Surgery Specialist training program. The Sydney program is based at Nepean Hospital and is the only specialist training centre in Australia, for Oral Surgery.

I am the Head of the Oral Surgery Department in the Nepean Blue Mountains LHD by NSW Health at Nepean hospital Oral Health Centre as.

I hold honorary Consultant Oral Surgeon positions at Orange Base hospital, Dubbo-Base Hospital and Campbelltown hospitals. I hold an honorary Professorial position at the University of Science and Health in Phnom Penh, Cambodia.

I hold positions on the Equivalence Committee of the Dental Board of Australia/Ahpra, as well as the Dental Council of New Zealand, as an assessor of qualifications on behalf of the Australian Dental Board and the Dental Council of New Zealand. I was a member of the accreditation committee of the Dental Council of New Zealand for the Oral Surgery program at Otago University, Dunedin, New Zealand.

The title 'Oral Surgeon' is not new nor is it contentious. It is well understood by the populations of Australia, New Zealand, Asia, Europe and the Americas. The use of the title is both informative and directional for the public's understanding of the role of this surgical service in Dentistry. The following websites are testament to the use of the term around the world:

- New Zealand
<https://dcnz.org.nz/i-practise-in-new-zealand/dentists-and-dental-specialists/scopes-of-practice/#:~:text=Oral%20and%20maxillofacial%20surgery%20specialists%20practise%20in%20the%20branch%20of,human%20jaws%20and%20associated%20structures.>

Europe

- UK - <https://www.england.nhs.uk/long-read/oral-surgery-clinical-standard/>
- European Union - **Oral surgery in the European Union: challenges of diversity in training and practice**
<https://onlinelibrary.wiley.com/doi/10.1111/eje.12168>

I will now respond to the question as to whether the use of the title "oral surgeon" by dental practitioners registered in the recognised dental specialty of oral surgery meets the statutory objectives and guiding principles of the National Law, in particular, whether the protection and use of the title:

1. provides for the protection of the public by ensuring that only health practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered;
2. facilitates access to services in accordance with the public interest;
3. enables the development of a flexible, responsive and sustainable Australian health workforce; and
4. 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.

My response:

1. **provides for the protection of the public by ensuring that only health practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered;**

The training program for Specialist Oral Surgeons has been approved by the Australian Dental Council (ADC) according to its robust set of accreditation standards for dental practitioners programs. These are endorsed by the ADC and approved by the Dental Board of Australia

(DBA) — pursuant to the *Health Practitioner Regulation National Law Act 2009* (National Law). <https://www.ahpra.gov.au/About-Ahpra/What-We-Do/National-Law.aspx>

Public protection is paramount in the administration of the National Registration and Accreditation Scheme, under which the Accreditation Standards are developed and approved in Australia, in accordance with the National Law. The Standards help to ensure that only suitably trained and qualified dental practitioners can register to practise in Australia.

https://adc.org.au/files/accreditation/standards/ADC_Accreditation_Guidelines.pdf

2. facilitates access to services in accordance with the public interest;

The specialist training program in Oral Surgery was considered after the University of Sydney was approached in the early 2000's by dental representatives of NSW public hospitals and the Armed Forces (army) requesting the reinstating of specialist Oral Surgery training services for their staff due to the lack of available public Oral Surgery services.

When Oral Surgery was added to the suite of dental specialist services gazetted by the Ministry of Health in 2010, Sydney University developed the curriculum for Oral Surgery based largely upon the scope of practice in the UK. The 'graduate diploma' was commenced in 2012 and the Doctor of Clinical Dentistry (Oral Surgery) in 2016. Oral Surgeons have since been employed by public hospitals across NSW (Wagga, Dubbo, Orange, Queanbeyan, Goulburn, Moruya, Young, Albury, Griffith, Yass, Cooma, Bega, Tamworth, Campbelltown, Nepean, Hawkesbury) Queensland (Townsville University Hosp.) and Tasmania (Royal Hobart hosp). Hence, providing surgical procedures under local anaesthetic (with or without sedation) to the general public with improved patient access to care.

The request for skilled oral surgery services in public hospitals have not only been from NSW. South Australia have made enquiries and a request to advertise amongst the training registrars for positions in SA.

In 2023 NSW Health approved the Scope of Practice for Oral Surgeons (Appendix 1) which acknowledges that Oral Surgery is a dental specialist acknowledged by NSW Health. This provides the

opportunity for hospitals to offer surgical procedures under local anaesthetic (with or without sedation) or general anaesthesia, to the general public with improved patient access to care.

3. enables the development of a flexible, responsive and sustainable Australian health workforce

The title “oral surgeon” for dental practitioners registered in the specialty of oral surgery aligns with the statutory objectives and guiding principles of the National Law by ensuring that only qualified professionals are recognized in this specialized field. This contributes to patient safety and quality care by distinguishing practitioners with advanced training. The protection and use of the title also support workforce flexibility and sustainability by clearly defining roles and responsibilities, thereby enabling effective workforce planning and resource allocation within the Australian healthcare system. This clarity helps in adapting to evolving health needs while maintaining high standards of practice.

4. 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

Protecting and regulating the title of ‘oral surgeon’ ensures that practitioners with specific qualifications and training are authorized to perform specialized procedures. This fosters trust among patients and the broader community, as individuals can clearly understand the scope and expertise of those providing their care. By distinguishing skilled practitioners in oral surgery, the title helps safeguard patient safety and supports informed decision-making, aligning with the National Law's goal of protecting the public and promoting transparency in healthcare.

I will answer the additional questions which have been sent to me.

1. DCD (OS) number of student places offered per year

The number of places offered into the USyd training program has varied since the program began in 2016. The training is hospital-based, at Nepean Hospital and has had the entry numbers as follows:-

2016 – 4 positions

2017 – 2 positions
 2018 – 2 positions
 2019 - 2 positions
 2020—2 positions
 2021 – 4 positions
 2022 – 3 positions
 2023 – 2 positions
 2024 – 4 positions

2. DCD (OS) Graduate numbers every year since cohort started in 2016 (first graduates 2019?)

Specialists Graduating from the Sydney program:-

2019 – 2 graduates
 2020 – 4 graduates
 2021 – 2 graduates
 2022 – 2 graduates
 2023 – 2 graduates
 2024 - 4 graduates
 Total graduates 16

3. DCD (OS) Graduate demographics if have (eg gender, age, Aboriginal and Torres Strait Islander)

2019 – 2 graduates [REDACTED]
 2020 – 4 graduates— [REDACTED]
 2021 – 2 graduates - [REDACTED]
 2022 – 2 graduates - [REDACTED]
 2023 – 2 graduates - [REDACTED]
 2024 - 4 graduates - [REDACTED]

Total number of graduates are 16 since 2016 made up of 6 females and 10 males.

4. DCD (OS) where graduates now working (ideally so we can see how many working in public system v private, if full or part time in public system, location where known such as if rural/regional etc)

a) Full time Public appointments (6 appointments)

Regional Murrumbidgee LHD
 2 x Metro Sydney & North Sydney
 Metro-Sydney South-West Sydney LHD
 Metro Western Sydney LHD

Regional Queensland ADF

b) Part-time appointments Public and Private (4 appointments)

Regional Murrumbidgee LHD

2 x Sydney Metropolitan

Hobart Metropolitan (Tasmania)

c) University & Private (3 appointments)

Western Sydney metropolitan

Western Sydney & regional NSW

Western Sydney & regional

d) Private (3)

3 x private practice

2025 Appointments made for public appointments

1 x WNSW

2 x Metro NSW (SN LHD, S LHD)

5. List of Public Hospitals which have engaged Specialist Oral Surgery graduates to date.

NSW

Hospital/Dental Clinics at the following hospitals

- Wagga base Hospital
- Queanbeyan,
- Goulburn,
- Moruya,
- Young
- Dubbo
- Orange
- RNSH
- Nepean
- Hawkesbury

General Anaesthetic (GA's) for oral surgery procedures at the following public hospitals:

- Wagga,
- Goulburn,
- Queanbeyan



- Young
- Dubbo
- Orange
- RNSH
- Nepean
- Katoomba
- Camperdown
- Concord

Queensland

- Townsville ADF facilities
- Cairns ADF facilities

Tasmania

- Royal Hobart Hospital

Should you require any clarification, or any further information please don't hesitate to contact me.

Regards,

