



NEW SOUTH WALES

## DENTAL TECHNICIANS REGISTRATION BOARD

PO BOX K599  
HAYMARKET NSW 1238  
AUSTRALIA  
Level 6, 477 Pitt Street Sydney NSW 2000  
Telephone: 02 9219 0233  
Facsimile: 02 9211 9318  
E-Mail: [dtech@hprb.health.nsw.gov.au](mailto:dtech@hprb.health.nsw.gov.au)  
Internet: [www.dtechreg.health.nsw.gov.au](http://www.dtechreg.health.nsw.gov.au)

31 March 2010

File Ref: HCC165

Mr Mel Keenan  
Committee Manager  
Committee on the Health Care Complaints Commission  
Parliament House  
Macquarie Street  
SYDNEY NSW 2000

Dear Mr. Keenan

### **Inquiry into the Operation of the Health Care Complaints Act 1993**

Thank you for the opportunity to respond to the committee members' additional questions:

1. In its submission, the NSW Medical Board expressed some concerns as to the degree of 'balance' between the HCCC and itself in terms of decision-making, particularly in respect of how to proceed in cases of alleged misconduct. Has the Dental Technicians Board had any similar experiences of co-regulation?
2. Are there any other comments that you would like to make with respect to the Inquiry's Terms of Reference?

The Dental Technicians Registration Board (DTRB) has found that its relationship with the HCCC when dealing with cases of alleged misconduct relating to either a Dental Technician or a Dental Prosthetist has worked well and has a good degree of balance.

However, the DTRB does wish to raise its concern with regard to the future of co-regulation between the HCCC and the Dental Board of Australia. The composition of the Dental Board of Australia consists of 1 dental hygienist, 1 dental therapist, 1 dental prosthetist, 5 dentists and 4 consumer representatives. Given that historically in NSW Dental Prosthetists have had an independent board, the DTRB strongly recommends that any peer review regarding complaints against Dental Prosthetists be carried out by peers from within their profession and not peers from the dental team as a whole.

The DTRB would also like to comment with respect to the HCCC's terms of reference:

1. The identification and removal of any unnecessary complexities in the NSW health care complaints system
2. The appropriateness of the current assessment and investigative powers of the HCCC
3. The effectiveness of info-sharing between the HCCC and Area Health Services and Registration Authorities in NSW

The HCCC has been informed of all complaints received and has in most cases played an important and useful role. We believe that it is imperative that whichever method is engaged to regulate Dental

---

Technicians and Dental Prosthetists that a robust relationship, similar to the current practice, should be maintained.

The DTRB wishes to again stress their concern over the future de-registration of Dental Technicians in the state of NSW. We understand that Dental Technicians will be obliged to practise in accordance with the Code of Conduct for unregulated health professionals. However without a register similar to the one that the DTRB currently maintains, compliance with this Code will be very difficult to monitor.

Dental Technicians are trained under a nationally approved course of training, Diploma of Dental Technology HLT50507 and are involved in all technical aspects when constructing both fixed and removable prosthetics. The work is undertaken by an instruction from a dental specialist.

Dental Technicians have contact with the public for taking shades. Usually the patient is referred to the laboratory where the Dental Technician will see the patient for the purpose of matching the crown to the surrounding natural teeth.

In some cases the patient will arrive with the crown un-cemented so that the Dental Technician can try the crown in and out as often as required until the patient is satisfied with the colour match. The Dental Technician may also have to fit a partial denture to the new crown or bridge and be required to handle the patient's denture as part of the process.

This direct patient contact requires the Dental Technician to have a full understanding of cross-infection procedures to protect the patient and the laboratory staff. The training package for Dental Technicians has a module specifically for this purpose.

Dental Technicians are trained in metallurgy and material science, subjects that are considered so important to the underpinning knowledge of a Dental Technician that they are not allowed to continue further training until they have satisfied the required pass mark in these subjects at each stage of their training.

The TGA only allow appropriate materials to be used in the construction of fixed and removable dental prostheses. Untrained / unregistered Dental Technicians will not know how to distinguish which materials are suitable for constructing dental prosthetics if they don't possess this knowledge. This will undoubtedly lead to a growing number of complaints against Dental Technicians in the future.

It is inevitable that the effect of untrained Dental Technicians teaching new workers in the industry will no doubt lower the standard of quality as time advances.

Thank you for your consideration and ongoing interest in the professional development of Dental Technicians and Dental Prosthetists.

Yours sincerely



Meredith Kay  
Chair  
Dental Technicians Registration Board of NSW

---