

7 May 2020

Marie Warner
Chief Executive
Dental Council of New Zealand
PO Box 10-448
WELLINGTON 6143
consultations@dcnz.org.nz

Dear Marie

**Australian Dental Council (ADC) / Dental Council New Zealand (DC(NZ))
Accreditation Standards for Dental Practitioner Programs**

Thank you for the opportunity to provide comments on the Australian Dental Council and Dental Council of New Zealand's (the Dental Council) *Australian Dental Council (ADC) / Dental Council New Zealand (DC(NZ)) Accreditation Standards for Dental Practitioner Programs* and the *Consultation paper - Proposed changes to the ADC/DC(NZ) Accreditation standards for dental practitioner programs*.

In response to the questions posed in the Consultation paper - Proposed changes to the ADC/DC(NZ) Accreditation standards for dental practitioner programs we provide the following feedback.

Regarding question 1 - Do you consider that the draft Standards are at the threshold level required for public safety? We consider that yes, the draft standards are at the threshold required for public safety.

Regarding question 2 - Do you consider that the draft Standards are applicable across all types of education providers delivering accredited programs? We consider that yes, the draft standards are applicable to all types of education providers delivering accredited programs.

Regarding question 3 - Do you agree with the following specific proposals as incorporated in the draft Standards?

- a. In New Zealand: A dedicated domain in the Standards on cultural competence for Māori and Pacific peoples, and its criteria (Domain 6a in the draft Standards).
 - Yes
- b. In Australia: A dedicated domain in the Standards on cultural safety for Aboriginal and Torres Strait Islander Peoples and its criteria (Domain 6b in the draft Standards).
 - Not applicable for the New Zealand context.

- c. The introduction of a preamble explaining the purpose of the Standards and how they will be used.
 - Yes
- d. An additional criterion requiring programs to ensure students understand the legal, ethical and professional responsibilities of a registered dental practitioner (criterion 1.8 in the draft standards).
 - Yes
- e. Amended criteria to require the involvement of dental consumers in accredited program design, management and quality improvement (criterion 2.2 in the draft Standards).
 - Yes
- f. For internal, external, professional and academic input into program design and development to be combined into one criterion (criterion 2.2 in the draft Standards).
 - Yes
- g. The revision of the criteria in Domain 2 – Academic governance and quality assurance to clarify that the focus of the Standards is at the program level.
 - Yes
- h. A revised criterion regarding intra- and inter-professional education, replacing criterion 3.6 in the existing Standards.
 - Yes
- i. Amendments to the domain on assessment, including changes to the Standard Statement and to the criteria underneath (Domain 5 in the draft Standards).
 - Yes

We do have further comment regarding a dedicated domain in the Standards on cultural competence for Māori and Pacific peoples, and its criteria (Domain 6a in the draft Standards).

We note that Domain 6 is proposed as a new domain for programs seeking accreditation related to cultural competence (New Zealand) or cultural safety (Australia). We note the Dental Council's rationale for determining cultural competence within the New Zealand and that the consultation paper states that "it is conceivable that the right focus could be a new or hybrid approach to cultural safety and cultural competence".

The Ministry would be supportive of the Dental Council amending Domain 6a to include both cultural competence and cultural safety.

The Ministry of Health has been undertaking work to ensure that health and disability workforces are not only culturally competent, but also work in a culturally safe manner. The Ministry is developing a new Māori Health Action Plan that aims to improve Māori health and wellbeing by further implementing He Korowai Oranga: the Māori Health Strategy. The Māori Health Action Plan is likely to include an outcome to address racism and discrimination in all its forms across the health and disability system by ensuring both cultural competence and cultural safety across the broader health and disability workforce.

The Ministry also asks district health boards (DHBs) to provide actions in their annual plans to increase both Maori and Pacific health and disability work forces. In the 2020/21 planning year, DHBs have also been asked to provide actions that support

cultural safety for both patients and their families and for health and disability workforces.

We further note that responsible authorities are beginning to take steps to address both cultural competence and cultural safety, such as the Medical Council of New Zealand's statement on cultural safety released in October last year. The Medical Council has stated that this reflects the evolution of thinking away from the cultural competence of doctors - that is acquiring skills and knowledge of other cultures - towards self-reflection of a doctor's own attitudes and biases that may affect the cultural safety of patients.

The Ministry of Health broadly support the Australian Dental Council and Dental Council New Zealand's proposed changes to the ADC/DC(NZ) Accreditation standards for dental practitioner programs. We encourage the Dental Council to consider including cultural safety in domain 6a of the proposed standards.

Once again, thank you for the opportunity to provide comments on the proposal.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Amy Wilson', with a long horizontal stroke extending to the right.

Amy Wilson
Acting Deputy Director-General
Health Workforce