

Professor Robyn Ward, AM FAHMS

Executive Dean and Pro Vice-Chancellor Medicine and Health
Faculty of Medicine and Health

08 June 2023

Mr Jason McDonald
First Assistant Secretary
Regulatory Reform Division
Department of Finance

Dear Mr McDonald,

Thank you for the opportunity to provide further comments on the Interim Report of the Independent Review of Overseas Health Practitioner Regulatory Settings to inform the final report being prepared by Ms Robyn Kruk AO.

Internationally qualified healthcare professional academics play an important role in providing expertise across a range of areas for the Faculty of Medicine and Health at the University of Sydney. Attracting internationally renowned experts to leadership roles is an important way to ensure that we maintain our research excellence in healthcare and the provision of world-class education to Australia's future healthcare professionals.

For this reason, I am very pleased to see the important progress being made with this reform agenda, and believe it will have significant repercussions that improve the ability for Australian universities to attract international experts into our academic roles.

In specific response to your questions, I offer the following comments on behalf of our Faculty Leadership Group:

1. Regarding the prioritisations of reform options, we suggest the following:
 - 1) Development of a single portal for all documentation/applications
 - 2) Expand competent authority pathways
 - 3) Consider greater flexibility to demonstrate recency of practice
 - 4) Better recognise overseas health practitioner experience and skills
2. Regarding what (if any) reform options are missing from the review:

Specific to Nursing and Midwifery

There is a need to recognise that international nurses who are mid-career and moving to Australia will not have had their primary education through the university system. This means that the requirement to produce evidence relating to unit of study grades and records of practice hours is challenging and often not possible. Expanding competent authority pathways removes that requirement, as the approvals of recognised registration authorities demonstrate that the applicant has the necessary knowledge, skills and expertise to meet our registration requirements.

Specific to Dentistry

Recruitment into Academic and Public dental roles is challenging and should be considered something that mitigation strategies need to address. Australia has comparably fewer dentists based on population, with around 63 practising dentists per 100,000 people in Australia in 2020, while other countries have a more robust dental workforce: Norway (93 dentists per 100,000), Germany (85), Japan (83), Denmark (72) and Canada (66)ⁱ.

The leadership of Sydney Dental School (SDS), along with other schools around Australia, find it extremely challenging to recruit appropriately skilled academic dentists required to educate our future dental workforce. This is driven by various issues, such as the limited availability of research fundingⁱ and the noted differential between remuneration available in private dentistry in Australia in comparison to academic salaries^{ii iii}. In addition, many dental specialist groups are extremely small in number in Australia, and this further impacts the lack of availability of people skilled to service university-led specialist training programs in dentistry across the country (for example, those we deliver for orthodontists, oral surgeons and endodontists).

Our Head of School and Dean of SDS was part of the leadership that convened a national discussion on this point through the Australian Dental Council at their 'Dental Academic Workforce - past, present and future' workshop in September 2022. Of note, the group called for regulatory bodies and relevant legislation to support dental academia and remove any identified barriers for the specialist dentistry academic workforce. They recommended that the Dental Board of Australia review the registration standard for international dental graduates wishing to pursue an academic position and remove barriers to academic workforce mobility where possible by developing a limited registration model for academic positions^{iv}.

Questions have also been raised by our dental academic leaders around the value of requiring internationally renowned specialist dentists wishing to come to Australia to provide education and conduct research in their field of expertise to meet the current requirement of being registered as general dentists before they can register as specialist. This is an accreditation requirement to supervise dentists undertaking specialist training and often poorly aligned with education pathways in other countries where, for example, a specialist dentist such as an orthodontist is usually not even permitted to undertake routine general dentistry work such as placing fillings or crowns.

We suggest consideration could be given to a separate pathway that enables a limited academic role for international dental specialists to be allowed to provide their expertise to Australian dentists in academic specialty training programs. This could be done without also credentialing them for general dentistry in Australian private practice. I understand from my dental colleagues that these academic specialists generally have no desire to join the private general dentistry workforce in Australia but could be providing extremely valuable expertise to our Australian dentists who are undertaking various specialty training programs provided by our academic institutions.

Please feel free to contact me should you wish to discuss any of these specific points in more detail and pass on my thanks to Ms Kruk for her efforts to support this important reform agenda.

Yours sincerely



Professor Robyn Ward
Executive Dean and Pro Vice-Chancellor
Faculty of Medicine and Health

ⁱ <https://onlinelibrary.wiley.com/doi/10.1111/adj.12949>

ⁱⁱ <https://au.talent.com/salary?job=dentist> and <https://www.smh.com.au/business/workplace/why-dentists-are-all-smiles-when-it-comes-to-their-working-week-20190114-p50rbn.html>

ⁱⁱⁱ <https://www.payscale.com/research/AU/Job=Dentist/Salary>

^{iv} https://adc.org.au/dental_academic_workforce_statement/
