

13 March 2026

Australian Dental Council
PO Box 13278
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Australia

Via email: consultation@adc.org.au

Proposed changes to the ADC/DC(NZ) accreditation standards for dental practitioner programs

Introduction

The Australian Dental Association (ADA) appreciates the opportunity to contribute feedback on the draft accreditation standards for dental practitioner programs.

About the ADA

The ADA is the peak national body for dentists in Australia. Representing more than 16,000 members, the ADA provides a unified voice for the dental profession, offering expert advice and advocacy on all matters relating to oral health and dental practice. The ADA is committed to advancing the oral health of all Australians through evidence-based policy, professional development, and community education. As the authoritative source on dental care and policy, the ADA works closely with government, regulatory bodies, and other health organisations to shape a sustainable and accessible dental care system for the future.

1. Do you consider that the draft standards are at the threshold level to deliver competent graduates who are safe to practise in Australia and New Zealand?

Yes. The draft standards reinforce the requirement that graduates are competent and safe to practise, with public safety remaining the primary organising principle. The proposed changes are minor and targeted, and do not lower expectations.

Key improvements include stronger assessment safeguards; clinical education expectations that emphasise adequate breadth and complexity; reinforced cultural responsiveness and inclusivity of care; clearer academic governance, integrity, and fitness-to-practise obligations that address emerging risks (such as AI, bullying, and academic misconduct); and continued alignment with professional competencies and National Law obligations.

2. Do you agree with the specific proposals as incorporated in the draft standards?

Yes, the ADA supports the specific proposals incorporated in the draft standards.

3. Are there any additional standards or Criteria that should be added?

Domain 5 Assessment, Criterion 5.1 requires: "Assessments conform to the principles of validity, reliability and fairness."

The ADC may wish to consider whether flexibility should also be explicitly recognised as a guiding principle within assessment design and implementation. Programs occasionally require reasonable adjustments for students with

approved special circumstances. This may include modified examination conditions or, where appropriate, equivalent assessment tasks or alternative formats. Recognition of flexibility would support equitable assessment while maintaining the integrity of outcomes.

Domain 5 Assessment, revised Criterion 5.7 states: “Students are assessed throughout the program by qualified and experienced educators, including external experts. External examiners assess students for final year exit examinations.”

The ADC may wish to consider clarifying that, for specialist dental students, external examiners should be qualified in the specialist discipline.

4. Are there any standards or criteria that should be deleted or reworded?

Domain 5 Assessment, Criterion 5.6 states that “Students receive consistent and timely feedback.”

While “timely” is generally understood, “consistent” may be open to interpretation (e.g., consistency in feedback approach, standards, or assessor application). Clarifying this would reduce ambiguity and aid compliance. A suggested rewording is: “Students receive feedback in a timely and consistent fashion.”

5. Do you have any other questions or comments on the standards?

Domain 1 Public Safety, Criterion 1.8 states: “Students and staff act ethically and professionally, with breaches managed or referred by the program provider.”

The criterion can reasonably be read to require both internal management of breaches and external referral where legally required (for example, where National Law notification thresholds are met).

To remove ambiguity, the ADC could adjust this to the effect: “Students and staff act ethically and professionally, with breaches managed under the program provider’s policies and, where required under the National Law, referred to Ahpra or another appropriate authority.”

Conclusion

The ADA supports the draft standards as setting a strong threshold for producing competent, safe graduates, and considers them broadly consistent with expectations for public safety, clinical competence, cultural responsiveness, academic governance, and assessment.

For further discussion of any matters raised in this submission, please contact Dr Kate More, ADA Chief Executive Officer, on 02 8815 3333.

Yours sincerely,



Dr Chris Sanzaro
Federal President