



Royal Australasian College
of Dental Surgeons
Let knowledge conquer disease

27 February 2026

Mr Jonathon Kruger/Ms Marie MacKay
Chief Executive Officers, ADC /DCNZ

By email: consultation@adc.org.au/consultations@dcnz.org.nz

Dear Jonathon and Marie

The Royal Australasian College of Dental Surgeons welcomes the opportunity to provide feedback on the proposed changes to the existing Australian Dental Council and Dental Council (NZ) Accreditation Standards for dental practitioner programs.

Please find our response to the questions raised regarding the changes.

Q1. 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, No, Somewhat, Unsure)

Yes. The Standards have worked well in practice to date, and the proposed changes provide good clarity and improvements to areas in the main. There are good changes proposed such as the clarify being provided at criteria 3.5 in relation to research literacy being appropriate to the level and type of qualification, and the new criteria 5.2, which ensures mechanisms exist for recognising and responding to emerging developments and risks in assessments.

Q2. Do you agree with the specific proposals as incorporated in the draft Standards? (Yes, No, Somewhat, Unsure)

Somewhat.

Q3. Are there any additional Standards or Criteria that should be added? (Yes, No, Unsure)

Unsure. Having recently submitted applications for accreditation with DCNZ, the Standards were comprehensive, covering a wide range of components that were received well by our college. The standards and criteria provided clear parameters to guide our program development, and the changes proposed provide greater clarity on the expectation of program providers, except in the areas listed in Q4 where further clarification would be helpful.



Q4. Are there any Standards or Criteria that should be deleted or reworded? Please clearly reference the specific criteria you are referring to for refinement. (Yes, No, Unsure)

Yes

1.8 as it is written in the current standards, accurately reflects RACDS' approach as a program provider with respect to ethical and professional conduct. While there are mechanisms in place to identify, manage and mitigate any issues of conduct in the training program, the rewording does not accurately reflect the nature of a healthcare environment. All Dental and Medical professionals have an obligation to report unethical or unprofessional behaviour to the regulator. RACDS also requests that these incidents are reported to the College as a professional body and program provider. However, often these instances are managed either by the employer, or jointly by the Hospital, as the employer, and RACDS as the provider, which is a complex environment to navigate. The National Health Practitioner Ombudsman has also made similar recommendations, which are extremely complex for all Medical Colleges to implement. RACDS would like to discuss this point further.

3.11 – further clarity is required about what level of “**formal agreement**” is expected/required. This is particularly relevant to a medical college where training is delivered in various sites ‘external’ to the program provider. RACDS creates formal agreements with training sites (a hospital or similar) through its accreditation processes, which holds the training site to certain obligations and exacting standards against which RACDS will measure sites to ensure training can initially (and on an ongoing basis) be delivered safely. These accreditation agreements between RACDS and a training site demonstrate intent and commitment from the training site and therefore form the agreement to jointly deliver training. It is unclear from the standard whether this will continue to be acceptable.

Domain 6

6.2 – RACDS can understand the rationale for the change of wording to this point, particularly in a University setting where training is delivered within a single jurisdiction. However, we have concerns about being able to continue to meet this standard when our training is delivered across various training sites in two countries.

Our engagement with Aboriginal and Torres Strait Islander groups into the design and implementation of training to date has been on a national level. It is also proportional to the size of the training program and the resources available within a small college. To implement an engagement model where there is local input for every site will create a more complex and challenging process that may not necessarily result in an improved experience for the trainee. We believe that this domain needs to reflect the capacity of the provider to fully meet these criteria.



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6.6 – RACDS assesses a Training Site's attitude towards ensuring an inclusive environment that provides culturally appropriate care during its initial and ongoing accreditation of that site. While this allows the College to ensure that trainees complete the required cultural safety training, are working within a culturally safe space and are therefore learning the required competencies, ensuring placements for *all* trainees is incredibly complicated, especially for a small specialty like OMS which is currently a specialty based in metropolitan areas. We are aware that various clinics already occur, but expectations of employers to meet local service need and funding often prohibit our trainees from more active involvement in opportunities that exist. RACDS is committed to providing regional training opportunities and is creating an action plan to facilitate this for trainees.

Q5. Do you have any other questions or comments on the Standards?

While we have made comments and have some small concerns, overall, the Steering Committee and Project Team should be congratulated on the consultation and document that has been produced. The proposed changes are a positive step forward which will benefit education and training providers, and therefore dentistry in Australia and New Zealand. If you have any questions, or would like to discuss any of the points further, please contact Chris Little our Director of Education at chris.little@racds.org

Yours sincerely,

Eithne M Irving
Chief Executive Officer