



9 September 2024

Dental Council  
[consultations@dcnz.org.nz](mailto:consultations@dcnz.org.nz)

## Proposed changes to Dental Council competencies and standards

Good morning,

1. The Free Speech Union is a registered trade union with a mission to fight for, protect, and expand New Zealanders' rights to freedom of speech, conscience, and intellectual inquiry. We believe that freedom of speech is not only a legal principle, but a social good that allows for people in modern liberal democracies to peacefully, freely advocate for the causes they care about without risking unjust retribution.
2. We write regarding the Dental Council's review of its competencies and standards to *"better align with contemporary literature and health sector standards on cultural competence, cultural safety and hauora Māori."* Specifically, we wish to express our concerns regarding the consultation process and what the proposed changes may entail.
3. The Council's method of consultation is to hold regional meetings and webinars for practitioners and stakeholders to *"engage directly with the Council and Associate Professor Curtis"* on the proposed changes. This may be constructive however, in the absence of allowing for written submissions, the quality and amount of feedback you will receive will be limited. The reason being that written submissions have several advantages over oral submissions, namely, writing allows for:
  - a. More thoughtful and considered arguments / points.
  - b. A level of anonymity and privacy as people can provide more honest and open feedback without fear of negative repercussions, live scrutiny, questioning, or immediate feedback.
  - c. Accessibility and inclusivity for those who are unable to attend a meeting or webinar due to time, location, or other constraints. People who are less confident in public speaking can still contribute their views.
4. Further, it has been brought to our attention that practitioners have not been advised of the proposed changes yet. With the regional meetings commencing in a week (16 September), there is insufficient time for practitioners to take time out of their busy schedules to properly consider the changes and any response they may wish to give.
5. Notwithstanding, our concern with cultural competence and cultural safety standards arise with the expression of differing views and opinions. Foremost among our concerns are professional requirements that express particular cultural attitudes, including:

- a. The impacts of racism, colonisation and power balance on Māori oral health, and;
- b. The need to reflect on the practitioners' own culture, including their biases, attitudes, assumptions, stereotypes, prejudices and characteristics, and;
- c. The need to understand the inherent power balance that exists in the practitioner-patient relationship

These include taken-for-granted assumptions and do not allow for differing views and opinions to be expressed or enacted.

6. Considering the above, we invite your comment on the following:

- a. When practitioners and stakeholders will receive the proposed changes.
- b. Whether practitioners and stakeholders will be able to provide written submissions in response to the proposed changes and if so, the length of the consultation period.
- c. How you will ensure practitioners are able to express and enact differing cultural views and opinions which differ from the specific attitudes expressed in professional requirements, without fear of professional censure.

7. We look forward to hearing from you.

Yours faithfully,

**Free Speech Union (New Zealand) Inc.**



**Jonathan Ayling**  
Chief Executive  
jonathan@fsu.nz  
021 842 215