

**Senate Committee on Education, Employment and Workplace Relations  
Inquiry into Industry Skills Councils**

**Submission from the Australian Veterinary Association**

The Australian Veterinary Association Ltd (AVA) is the national representative body for the veterinary profession in Australia. Membership exceeds 6000 and represents all sectors of registered veterinarians in Australia.

The AVA is a single corporate entity with a Division in each State and Territory and branches at the regional level. Special interest areas of veterinarians are catered for through 22 Special Interest Groups within the Association. These Special Interest Groups cover a broad range of veterinary interests in all livestock species, horses, companion animals and wildlife. Many veterinarians work with or alongside para-professionals in their daily routines.

The AVA has a vital interest in the activities and training of para-professionals and in this case a particular focus in the welfare of animals and their owners and carers. The overwhelming concern of the AVA is for the welfare of animals and AVA seeks to have all members of the community respect and value the benefits of enhanced animal health, welfare and production.

The AVA submission focuses on two main parts of the terms of reference, viz.

*(a) the role and effectiveness of Industry Skills Councils (ISCs) in the operation of the national training system particularly as it relates to states and territories and rural and regional Australia; and*

*(g) the effectiveness of each ISC in implementing specific training initiatives, for example the Skills for Sustainability initiative under the National Green Skills Agreement; and*

*(h) any related matters.*

People of all levels of training, who are not registered veterinarians, provide services to animals however in this submission we address those who are trained at the vocational/TAFE/certificate/diploma level.

These services cover many disciplines including equine dentistry and pregnancy diagnosis, artificial breeding, physiotherapy, behaviour, nutrition and embryo transfer, to name a few, in many species

**Our concerns address several areas:**

1. Any proposed training course must first be shown to be filling a demand by a commissioned scoping study to assess the current situation in the field.
  - i. A scoping study that does not demonstrate a need for appropriately trained para-professionals indicates the development of a national training program is wasteful and unnecessary.
  
2. The level of education and training of para-professionals.

- i. Recognition may be given for applicants who have worked in the area of proposed study, but there needs to be acknowledgement of the academic requirements to achieve the level of competencies aimed for.
  - ii. Training methods and length of training required need to be uniform and consistent to allow portability of the learned skills between jurisdictions.
3. Determination of levels of competency.
  - i. These levels can only be determined by qualified experts in the field of study and at a higher level than the course undertaken.
  - ii. Professional input is needed to ensure the attainment of accumulated competencies is met by the level of training required.
4. Whether para-professionals are accredited, licensed and accountable.
  - i. The public needs protection by ensuring there are mechanisms in place to hold para-professionals accountable as with other professions and there is a transparent registration and deregistration pathway.
  - ii. An equivalent regulatory Board is needed to adjudicate on disputes and enforce accountability.
  - iii. Veterinarians are registered and controlled by veterinary practitioners' boards. The public has assurance of training, accreditation and statutory oversight. Veterinarians can be investigated and disciplined in the event of incompetence or malpractice. They are required to undertake extensive continuing education to maintain registration to practise all veterinary procedures, including equine dentistry.
5. The development and delivery of training programs.
  - i. Expert and professional input is required to develop the list of competencies to achieve the desired standard. Lay persons need guidance by professional experts in each area of study in the development of competencies and also in the teaching of these programs.
  - ii. Training programs need a mechanism of update and review to ensure that realistic and achievable competencies are being delivered.
6. Arrangements for consultation with the veterinary professionals to monitor the standard of students completing the training packages.
  - i. Wide variations in the abilities of persons who complete certification and diploma level courses must be prevented with appropriate assessment protocols.
  - ii. Lack of quality assurance across the various training providers is a risk factor.
  - iii. Schemes designed for non-professionals need to be based on training programs following consultation with industry and skilled professionals.
7. There are demands for access to scheduled poisons.
  - i. This involves the actions of examination and diagnosis which are Acts of Veterinary Science and limited to veterinarians by law.
  - ii. Prescription of scheduled poisons is limited by law.
  - iii. A knowledge of physiology, pharmacology, anatomy and chemistry is required for the use of scheduled poisons.
  - iv. The ability to institute emergency reversal agents or maintain body functions is beyond the scope of an unsupervised para-professional.
8. Roles and limitations on the activities of para-professionals.
  - i. A blurring of the limitations and role of para-professionals can lead to poor welfare outcomes. The roles and limitations of practice by para-professionals need to be defined in law.

A case study in point is the recent process directed toward development of a Certificate IV Equine dentistry package:

Some important facts in equine dentistry:

- Equine dentistry has been performed at basic level for many years by persons trained by apprenticeship or personal experience without any formal oversight.

These persons have performed a physical task using basic tools such as rasps to remove sharp points that develop on horse teeth. Some times they cause lacerations or other trauma.

- In recent times great advances have been made in understanding the dental needs of horses.
- There has been a surge in the use of power driven instruments to treat a greater range of abnormalities as with human dentistry.
- Such instruments can very rapidly cause life-threatening damage to the oral cavity, bones and the health of horses, and affect their ability to masticate feed.
- Horses are the only species where dental procedures can be carried out without the background of at least a broad-based undergraduate training program.

All other species (including humans) have the benefit this broad-based education for dental providers. Furthermore, all persons who seek to perform dental procedures must be registered with an appropriate statutory authority to ensure that dental practitioners are properly educated and trained, and can be held accountable for their actions.

People who perform dental procedures on horses in some jurisdictions are exempt from these provisions. Currently untrained, uncertified, unexamined persons can perform dental procedures on horses and they operate outside any direct statutory oversight. Currently they are unregistered and unregulated in all jurisdictions.

The AVA, being the peak body representing veterinarians in Australia, has been a participant in the consultation process to develop such a course in equine dental procedures for non-veterinarians.

The AVA represents veterinarians that perform the bulk of equine dentistry in Australia and has access to specialist expertise that can be called upon for informed comment. The AVA Special Interest Group, Equine Veterinarians Australia (EVA), ensures that AVA members have access to ongoing training to upgrade skills of veterinarians who undertake equine dentistry.

AgriFood Skills Australia has been tasked by the Department of Education, Employment and Workplace Relations (DEEWR) to develop a proposed national training package in equine dentistry for non-veterinarians.

The AVA has been dissatisfied with the consultation and development phases of this project from the outset. It is crucial that views wider than existing non-professional practitioners and users of services be deeply involved.

The AVA has always been more than willing to contribute to this process and has participated in:

- meetings with AgriFood Skills Australia and their consultant;
- has assisted with setting up consultative meetings with interested parties; and
- has displayed a clear commitment to remain engaged in the development phase of this training package.

There are some disturbing trends in the development of this training package.

- 1) We feel that our ability to contribute to the process has been largely ignored.
- 2) Work on this proposed Certificate IV Equine dentistry course for non-veterinarians to date does not appear to take essential issues of animal welfare and consumer protection into account.
- 3) The proposed package seeks to elevate a certificate level course to the equivalence of a university bachelor degree in human dentistry, or veterinary medicine.
- 4) The course seeks to circumvent established international protocols and standards of training regarding animal welfare, surgical and medical care, and use of Scheduled Poisons.

## **Summary**

The overriding concern of the AVA is the welfare of animals. The case mentioned above relates to the development of a world class training package that promotes excellence in dental practice for horses based on current scientific knowledge.

There is agreement that training packages should be nationally recognised and accredited in all states and territories. Registered training organisations (RTO's) must be properly resourced, meet registration requirements and submit to regular auditing to ensure there is consistency in the education standard and case load experience.

Some form of accreditation/licensing must be put in place for para-professionals to ensure levels of competency, responsibility and redress by the general public.

Any such training package must fill a demonstrated gap to meet the needs of an industry. It is recommended that prior to the development of any training package that a scoping study is performed to ensure that there is a demonstrated need for the development of the proposed package otherwise money will be expended unnecessarily.

Development of any training package must always include the relevant professional association on their steering committees to ensure that the roles and limitations of the trained para-professional are aligned with the appropriate achievable competencies so that in combination with the relevant professional, they can provide a high quality service to the community.

*The Australian Veterinary Association  
5 August 2010*