



12 July 2021

President  
Equine Veterinarians Australia  
Via email: Jeffrey.Wilkinson@ava.com.au

Dear Dr Lewis,

**Re: Letter of Exception - Diploma Course in Equine Allied Health**

Thank you for submitting your Letter by Exception to Skills Impact. There is a set process to submit recommended changes to the training products for formal endorsement in the quality-controlled Vocational Education and Training system. These letters are required after the Industry Reference Committee has reviewed the project recommendations and before they are reviewed by the Australian Industry and Skills Committee, the federal oversight body for this work.

While we are nearing this point in the process, we are still undertaking consultation on behalf of the Animal Care and Management Industry Reference Committee and will confirm with you at a suitable time in a few weeks whether you wish to formally submit this or a similar letter to the Australian Industry and Skills Committee.

In the meantime, we wish to provide responses for the consideration of your members and would request that you circulate this response widely among your members as the Animal Care and Management Industry Reference Committee would appreciate all feedback available on these matters. We have heard from approximately 40 veterinarians who are EVA members so far, including from some members who appear to be part of a campaign challenging the proposals, as well as some who have not raised objections to the proposals or have provided other feedback.

**Background**

Prior to undertaking this project, the Animal Care and Management Industry Reference Committee considered the available evidence relating to the job role of equine dental technician and feedback of the current Certificate IV qualification. This evidence was reported to the Australian Industry and Skills Committee. This included reporting the positions of the AVA and EVA, as well as other bodies over several years. Details can be found in the [Annual Update 2020](#), the [2019 – 2022 Skills Forecast](#) and the [2018 – 2021 Skills Forecast](#) for Animal Care and Management.

One key piece of evidence missing from the available information was the actual way in which horse carers/owners are obtaining equine dentistry services across Australia. Under the guidance of the Industry Reference Committee, Skills Impact undertook a survey aimed at horse carers/owners during 2019 and the results were reported in the Annual Update in 2020 and made available on our website. Information inviting participation in this survey was disseminated to the EVA (we note some EVA members claim this was not the case). The survey was completed by more than 500 respondents. This number of respondents is sufficient to be illustrative of the roles, resources, services and tasks in which many are engaged as they care for, own and work with horses.

Skills Impact is a national not-for-profit skills service organisation, contracted by the Commonwealth Government.

Identifying and defining skills standards to meet industry needs

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The survey results indicate that more than half of horse carers/owners engage equine dental technicians only for services, and another quarter of the respondents engage equine veterinarians who work with equine dental technicians. The results also indicate a widespread lack of access to equine dental services, especially veterinarian-based services. This lack of access was marked in regional, rural and remote areas, and particularly in Northern Australia. The [full report of the results](#) is available on the Skills Impact website

There have been a number of drivers of this project. One of those has been the shortage of veterinarians (which remains after many years on the national Skilled Occupation List as a result of the shortage) and the reports of mental health issues experienced within the profession as a result of the nature of the work and stresses relating to being unable to meet demand (among other causes).

Another driver has been information indicating the current qualification is not competitive with international offerings, leading to lower than expected enrolments. This is a concern for the Industry Reference Committee given there is no current way that equine carers/owners would be able to check whether international qualifications are delivered in quality assured and regulated ways, as is required for Australian offerings within the formal Vocational Education and Training system.

### **Recognition of the Occupation of Equine Dental Technician**

The role we are currently describing as equine dental technician (views on the appropriate terminology are welcome) has been recognised in Australia for some time. There have been formally recognised vocational qualifications since at least 2012. There are also industry-based programs. There are no legislative bars to persons undertaking this work, though practitioners are subject to legislation concerning animal welfare.

The occupation is recognised internationally and there are relevant qualifications, professional bodies and training available internationally. There are international organisations which certify educational programs for quality and setting relevant standards.

In addition, there is recognition of the existence of the occupation (with limited scope) in the AVA position statement on Restricted Acts of Veterinary Science (further discussion below) indicating that this is a legitimate occupation.

The issue facing the Animal Care and Management Industry Reference Committee is whether this occupation is one which requires a level of skill and knowledge that should be recognised and supported by formal training. Given the considerations of animal welfare, and the skills and knowledge involved, the Industry Reference Committee agreed that if the occupation is practised in Australia, which is clearly and indisputably the case, then formal, quality assured training should be available.

### **The AVA/EVA Position Statement and the decision to Update the Training Product**

We note that the AVA position statement on "restricted acts of veterinary science" was updated in February 2017, at a time when the current qualifications were under discussion and the subject of a similar controversy as that now taking place. We note that the statement was updated to specifically refer to a Certificate IV qualification, which reflects one of the debates about the relevant AQF level of the qualification that was taking place at that time.

Of importance, given the scope and the limitations of the role of the Industry Reference Committee, is that there has been no legislative or regulatory support for the position of the AVA. There are no bars to this occupation and the occupation has not been regulated or controlled.

The Industry Reference Committee is required to make decisions in the broader public interest, not only those reflecting the viewpoints of particular professional bodies, however highly regarded those bodies might be. There are members of the Industry Reference Committee who are experienced veterinarians, active in the AVA, and supportive of AVA positions.

The Industry Reference Committee is fully aware of the current AVA position statement on Restricted Acts of Veterinary Science. They have considered the AVA Statement on Equine Dentistry from 2008. They have also considered the AVA Statement on Regulation of Animal Health Service Providers adopted in 2018. They are aware of the professional knowledge, scientific evidence and concern for animal welfare that goes into the preparation of these statements. A review of Skills Forecasts and Annual Updates will demonstrate this understanding (links above).

Making decisions based on public interest requires consideration of the ways in which work is actually undertaken and the needs of animal carers/owners, employers (including self-employed) and practitioners. There needs to be consideration of the views of other industry bodies. We note that the AVA position on equine dentistry does not seem to have included consultation with other industry bodies or attempts to work with other bodies in the development of the statement.

It was after considering all of these factors that the Industry Reference Committee made the decision to proceed with updating the currently available qualification.

### **The encroachment of occupations on traditional professions**

All traditional professions have faced issues related to the range of their occupational coverage, and this includes health professionals for both human and animal services. The development of "allied health" occupations, particularly over the last 60 years, has been remarkable, and these are now widely acknowledged with many being included as formal training products within the Vocational Education and Training system. For example, the scope of the occupation of Veterinary Nurse as practised today far exceeds that same occupation as practised 50 years ago.

There are regulated and non-regulated occupations in both human and animal health fields. Often these have developed in the face of strong resistance from traditional professions. Over time, the usual outcome has been the development of a suitably qualified and competent allied workforce, based on criteria developed with the direct involvement of the traditional professions to ensure services produce improved health outcomes.

The Animal Care and Management Industry Reference Committee is itself a committee that brings together representatives from the range of relevant industries, including veterinarians. The Committee has considered the views of the AVA and EVA and has invited participation in the feedback process related to this training.

We note that the EVA holds a belief that the need for services can be met through veterinary provision and cites graduation rates as evidence. Yet this does not seem to be translating into sufficient actual provision of service, leading to outcomes that are detrimental to animal welfare. The occupation of veterinarian remains listed on the national Skills Occupation List indicating a significant shortage of available practitioners.

## **Regulation of Equine Dentistry**

The EVA and most of the veterinarians who have responded to the requests for feedback on the proposed updating of the training have indicated a concern about the lack of regulation of non-veterinary service providers.

This is not an issue that can be addressed by the Animal Care and Management Industry Reference Committee and can only be addressed through federal, state and territory bodies, which is usually dependent on the actions of member-based organisations like the AVA/EVA.

The Industry Reference Committee went so far as to write to the Australian Industry and Skills Committee raising the importance of considering regulation when examining training and requesting an active role in promotion of regulation by that Committee. This position was not accepted as being within the remit or roles of the Australian Industry and Skills Committee or its associated bodies (such as the Industry Reference Committees).

An aspect of future regulation that may not be apparent to EVA members is that new regulation of occupations usually only occurs after the development of formally recognised training at a suitable level. This is key evidence usually required to support a decision to regulate (or protect) occupations (see for example, the Australian Government Guide to Regulation published in 2014).

While the Industry Reference Committee itself has no role in decisions concerning regulation, the existence of appropriate levels of formal training helps to create the foundations for regulation to be considered. The journey to regulation usually starts with the cooperative adoption of criteria (often with self-regulation) developed between the relevant occupational bodies.

### **Sedation – to teach or not to teach**

There is no performance requirement in the proposals for equine dental technicians to sedate any animal, and the knowledge and performance requirements make it clear that decisions concerning sedation must be taken in accordance with legislation and regulation, and under the supervision of a veterinarian. The relevant units do include training to assist the technicians to recognise when sedation may be required and the reasons that it is important in these situations to refer these situations to veterinarians.

An extract of an example of the current proposals for updated training is attached, and all draft units are available for review [on the Skills Impact website](#).

In the often tumultuous journey to the development of appropriate allied occupations and associated training, one of the areas of greatest dispute is where the line needs to be drawn between each occupation, and whether there should be knowledge available to the community and "allied practitioners" outside of the traditional profession.

In particular, there have been many debates on whether to:

- Restrict knowledge to the qualified traditional professional to ensure that they, and only they, can undertake a specific activity.
- Provide broad knowledge to ensure that those undertaking allied practices can make appropriate decisions.

The Animal Care and Management Industry Reference Committee and those who participate in the development of vocational training products will always have a leaning towards belief in the importance of education and the provision of knowledge. They are passionate about the benefits of education and get involved in these activities as a result.

This is not always the case with the qualified, practising professionals who often have to deal with the health and welfare impacts of poor service provision, which can be very serious.

The working group has recommended (yet to be finally considered by the Industry Reference Committee) the inclusion of appropriate knowledge components to ensure equine dental technicians understand the importance of considering sedation, why they should not be involved in the unsupervised administration of sedation, and why it is important to work collaboratively with carers/owners and veterinarians.

It is the view of the working group that it is appropriate to provide the level of knowledge and training proposed in the draft units. In reaching this view, the group has considered:

- The feedback received from all sources, especially that received from veterinarians.
- The legislative and regulatory positions of all jurisdictions in Australia.
- The current inclusions relating to sedation in training for other allied occupations, and the significant differences in methods of practice and supervision levels.
- The potential for current or future supervision via telehealth and similar technology, and other technological advances that may assist access to services, particularly in regional, rural and remote Australia.

It is the current recommendation of the working group (not unanimous) that training in the administration of sedation should not be included in qualifications at this level. Their discussions indicate that even if there was a movement towards change in the future, such training would need to be provided by veterinarians outside of the Vocational Education and Training system. The current view is that how administration of sedation is undertaken should be left in the hands of the relevant veterinary authorities and professional member bodies.

### **The use of Technology, specifically motorised instruments and powered tools**

The current drafts of the updated training include training in the use of modern technology in the application of specific activities that fall within the scope of an equine dental technician. This includes activities that have been referred to in the feedback variably as the use of motorised tools, the use of power tools or mechanical floating.

It is difficult to envisage a situation in which entry-level candidates coming into this training would not have an expectation that modern technology is used, given that the use of technology is part of all school curriculums and delivery of post-school training programs. Manufacturers across all engineering disciplines are turning towards the manufacture of modern equipment rather than traditional equipment. Carers/owners have expectations of the best available treatment for their equines.

The experience of health professions generally has been that activities that were once only undertaken by degree-qualified and regulated professions can now be undertaken by others, as can be seen in human dentistry. Generally, the professions have responded by re-examining the nature of the procedure and the risk profile related to procedures, rather than focusing on specific technology for delivery (unless the technology itself requires significantly different, additional skills). Arguments have been mounted that this approach is not appropriate in equine treatments because of the nature of the

animals, harm that can be caused (which may need to be treated by a veterinarian) and animal welfare concerns.

The correct use of technology and the potential risks involved are described in the draft unit *ACMEQD5X3 Perform equine dental treatment and oral care using appropriate instrumentation* which is attached and is also available on the Skills Impact website.

The use of emerging technology is always a difficult area for the Vocational Education and Training system given:

- Today's technology can be superseded in very short order
- New technology may be a significant advance and may result in the ability to undertake work previously not within an occupation's scope
- There is an expectation that the training is flexible and responsive enough to meet current and future needs
- There is often a need to retain training of traditional (in this case, manual) techniques as the availability of technology to practitioners can be extremely variable

Currently, it appears that the available technology in equine dentistry can only be used when sedation has been administered, although this is being challenged as the technology improves. Defining the current position of use of technology is difficult in most occupations, especially health-related occupations where serious surgical procedures are now being carried out with the use of automation.

International trends indicate a shift towards the use of technology by equine dental technicians. Although this appears to be contrary to the stated position of the AVA related to restricted practices (though possibly within the scope of Regulation of Animal Health Service Providers), this also appears to be occurring in the delivery of services in Australia.

At this point, the working group intends to recommend that there should be formal, quality-assured training available involving the use of technology. The working group have agreed that it is best for individuals to learn how to use the tools available in this safe and supervised environment. When out on the job, practitioners can choose not to use technology if they wish. The training reinforces the importance of assessing the actions to be undertaken and referring to veterinary professionals when required.

As anybody delivering the training will need to meet Australian Skills Quality Authority requirements (which are subject to audit) relating to the delivery and teaching of each unit, it is going to be necessary for qualified and experienced equine veterinarians to participate in and supervise this training.

We are very willing to continue to receive feedback on this issue, which has been the subject of much debate and discussion over the last 5 years.

## **Entry level and ongoing education requirements**

Another concern you have raised which has been supported by veterinarians relates to the lack of entry-level and ongoing education requirements for the occupation of equine dental technician.

Training cannot be mandated through the Australian Skills system as protected occupations can only be achieved through legislative and regulatory processes.

There are restrictions on the entry-level requirements that can be imposed for learners seeking to enter occupations under government guidelines applied in the Vocational Education and Training system. International and national research and consultation indicates that previous qualifications, and in particular, higher education qualifications, are not required to be an equine dental technician.

The proposed entry level requirement for the qualification is:

*Entry into this qualification is open to individuals who:*

*have completed the following units of competency (or equivalent):*

*ACMEQU2X12 Handle horses safely*

*ACMEQU2X13 Follow safe work practices in equine industries*

*ACMEQU3X6\* Provide routine care for horses*

*OR*

*have relevant equivalent skills and knowledge acquired through participation in the equine industry.*

The situation regarding ongoing occupational training is outside of the scope of consideration for the Australian Industry and Skills Committee and Industry Reference Committees, who are required to consider matters relating to the formal Vocational Education and Training system. This is the situation for all occupations covered by the system, but it is an expectation of the system that graduates will develop an understanding of the importance of lifelong learning.

## **Reports of Poor Work Performance by Equine Dental Technicians**

We note that the EVA has included information about reports of poor work performance by equine dental technicians in the past, and some veterinary respondents have given stronger feedback in this regard.

Should any veterinarian have information regarding the poor treatment of animals, this is a matter for them to take up with appropriate animal welfare authorities. That is part of their professional obligations and a matter for each veterinarian to decide (although we are also aware of reports that these authorities may not have the resources needed to successfully address these concerns).

The Animal Care and Management Industry Reference Committee recognises these concerns, but the only actions within the scope of this committee are to review the training to ensure appropriate skills and knowledge are available, and that the qualification is set at the correct level. This has the additional effect of bringing the qualifications with the system that protects the use of terms such as "degree" and "diploma" under the federal legislation restricting these terms to use by training in quality controlled conditions (Universities, Registered Training Organisations). The Animal Care and Management Industry Reference Committee role in addressing issues of lack of competence is to ensure the training is available that will help to improve standards and animal welfare.

## **The emergence of Equine "Allied Health" Occupations**

The proposed qualification also covers equine massage and has been designed in a way that may be suitable to include further similar occupations in the future.

A concern for the Animal Care and Management Industry Reference Committee is the emergence of occupations dealing with animal health that have no formal training available and which may impact on equine welfare, often mirroring similar services in human health.

Examples of these occupations include chiropractor, massage (including body work, Masterson method and Equine Myofunctional Therapy), physiotherapy, Bowen/Emmett therapy, acupuncture and osteopathy.

The current proposal only includes massage and equine dental technician as established occupations and the training is designed to ensure that consumers can identify and verify qualifications with recognised skills and knowledge levels.

A factor in approving this training product project was the potential impact that these occupations may have on equine health and welfare. The Animal Care and Management Industry Reference Committee has taken the view that the development of formally recognised training may contribute to broader understanding of which services have been considered for quality and impact, and which ones do not currently have an evidence-base that has been independently considered.

The survey of horse carers/owners referred to above found there is a desire among this group to use services from appropriately qualified people. This has also been a factor in making the decision about the appropriate Australian Qualifications Framework level for the proposed qualification.

## **Diploma or Certificate IV**

One of the responses to the initial feedback received from concerned veterinarians and others led to escalating the proposed qualification from Certificate IV level to Diploma level.

Some of the reasons behind this decision include:

- Escalating the importance of animal welfare and ensuring access to appropriate knowledge relating to the potential impact of any form of diagnosis, treatment or therapy on animals, despite how simple some procedures might appear to unqualified community members.
- Highlighting the importance for those in the field to understand the roles of veterinarians and to consult them.
- Allowing for the inclusion of sufficient knowledge components to ensure that practitioners can undertake activities safely and understand when and how decisions should be taken to call in veterinarian assistance.
  - The proposed qualification covers job roles which require:
    - application of theoretical concepts, with some in-depth knowledge and technical skills
    - personal responsibility and autonomy in performing technical operations with responsibility for own outputs
    - initiative and judgement to organise work.
- Making the qualification more attractive for current and student veterinarians.
  - Industry research indicates that veterinarians report they often benefit by skills-based training in equine dentistry and any vocational training could also be very useful to these professionals if correctly designed, and if the attitudes towards undertaking VET training after completing University degrees can be addressed.

- Vocational qualifications are delivered within a practical environment, providing direct and supervised experience with horses.
- Some feedback suggested that current veterinarians undertook equine dental technician work while studying both for experience with equines and to support studies.
- Diploma level qualifications are generally more attractive for those with or studying towards higher education qualifications.
- Ensuring that any future expansion of "allied health" services have foundations in animal welfare and health outcomes.

Given these factors, it became clear that the appropriate level of learning would need to be at Diploma level as described by the Australian qualifications Framework.

### **Further Feedback**

Skills Impact is open to receiving feedback at any time. While we have formal feedback processes that help us to promote participation in projects at set stages, we also collect, record and report feedback received at any time. We will continue to be open to the feedback from veterinarians concerning this project and hope that your members will consider the further information we have provided. We invite them to continue to address matters relevant to the Industry Reference Committee professionally and with respect to the role being played by all participants in this process.

Yours Faithfully,



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