

Primary Care Dental Services Clinical Governance Framework

May 2006 (Updated)

Clinical Governance Framework – Guidance for Primary Care Dental Services Providers

This clinical governance framework is based on *Standards for Better Health*, which was published by the Department Health (DH) in 2004. (available at: <http://www.dh.gov.uk/assetRoot/04/08/66/66/04086666.pdf>).

The standards set out the level of quality that all NHS organisations are expected to meet or aspire to.

In total, there are 24 core and 12 developmental standards across seven domains or subject areas. Organisations are expected to meet core standards now; however, the developmental standards aim to encourage development over time. In future PCTs will determine locally what detailed systems and criteria they wish to use to assure the quality of the primary dental care services they either commission, or provide. It is intended that this clinical governance framework could be used by PCTs as a resource to help them with this if they so wish.

The standards are designed to cover the full range of healthcare, whatever the setting, and as a consequence do not always translate easily to primary dental care. Consequently, this framework has adapted the standards into 12 themes and identifies the key requirements for primary dental care, the majority of which are met by existing clinical governance requirements, or reflect Standards for Dental Health Professionals published in 2005 by the General Dental Council. However, there are a number of new requirements that are generic to the NHS, notably:

- Child protection;
- Prevention and public health;
- Staff appraisal and personal development plans;
- Patient involvement and choice.

New resources are presently being developed to support these requirements. They are due to be published shortly, at which stage they will be added to the 'sources of information' section of the framework. Readers will note under each theme in the framework (e.g. Infection Control), there are letters and numbers (C1, C4 etc.). These indicate the relevant core and development standards from Standards for Better Health met by the requirements.

It is hoped that the framework will be useful for PCTs when developing local guidance and to help identify areas where local service providers will need support in developing systems. For example, joint work and support are likely to be required when developing strategies under Prevention and Public Health (theme 4) and Patient Information and Involvement (theme 10). PCTs may wish to include their own local resources in the Sources of information section in relation to topics such as training in appraisal, occupational health services and child protection.

The Dental Reference Service and Dental Practice Advisors are both existing resources, which PCTs may wish to use to help them monitor compliance against the standards. PCTs may also wish to look to dental practitioners to make their own initial assessment of compliance with local standards. If PCTs choose to use or adapt the attached framework, there is a section that practices could use to assess progress towards the themed standards. Practices could then draw up a practice development plan aimed at working towards full attainment.

Finally, it should be noted that there are a number of excellent clinical governance “toolkits” available, which will take practices and services a very long way to meeting the Standards for Better Health. These include:

- the BDA Clinical Governance Toolkit,
- BDA Good Practice Scheme,
- Clinical Governance – A continuing quality improvement programme for general dental practice (published by Smile-on in association with the Postgraduate Deanery for Kent, Surrey and Sussex) and
- the Faculty of Dental Practice’s Key Skills in Primary Dental Care.

This guidance aims to complement such toolkits.

Primary care dental services clinical governance framework

Theme	Requirements - key actions and policies
1. Infection Control C1, C4, C10, C20, C21, D1, D12, D13	Procedures in accordance with BDA/DH Advice sheet A12 (Infection Control in Dentistry) including: <ul style="list-style-type: none"> • Infection control policy; • Inoculation injury policy and recording of Hepatitis B immunisation status of exposure prone staff; • Staff induction programme to include infection control procedures and staff training; • Audit of policy compliance.
2. Child Protection C2, C6, C10	<ul style="list-style-type: none"> • Identification and CRB checks for all staff • Child protection policy which is consistent with local and wider policies including any staff training requirements
3. Dental Radiography C1, C11, C24	Procedures and policies in accordance with the IRR(1999) and IR(ME)R (2000) including: <ul style="list-style-type: none"> • A quality assurance system • X-ray malfunction plan, including how to manage an unintended over-exposure; • Records of staff training and updates. • X-ray equipment maintenance records
4. Staff, Patient, Public and Environmental Safety C1, C4, C5, C20, C21, D12	<ul style="list-style-type: none"> • Significant events analysis procedures and changes to procedures initiated as a result • Compliance with Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 1995 • Procedures to ensure all relevant safety alert bulletins are disseminated to staff and acted on • All medical devices are CE compliant, staff training for usage provided and incident reporting carried out • Medicines are appropriately sourced, purchased and stored including a medical emergencies drug kit • Compliance with Carriage of Dangerous Goods and Use of Transferable Pressure Equipment (Amendment) Regulations, 2005 • Hazardous waste regulations 2005 and the management of waste amalgam/mercury • Health and Safety at Work Act 1974 • Management of Health and Safety at work Regulations 1999 • Workplace (Health, Safety and Welfare) Regulations 1992 • Control of Substances Hazardous to Health Regulations 2002 (Also see Infection Control , Child Protection and Dental Radiography)

Theme	Requirements - key actions and policies
<p>5. Evidenced-Based Practice and Research C1, C3, C5, C12, D2, D11</p>	<ul style="list-style-type: none"> • Relevant NICE Guidelines are followed • Clinical care is informed by other evidence-based guidelines • Existing care pathways and referral protocols are followed • Where appropriate, principles of research governance are applied
<p>6. Prevention and Public Health C22, C23, D13</p>	<p>An evidence-based prevention policy for all oral diseases and conditions appropriate to the needs of the local population and consistent with local and national priorities. This should include:</p> <ul style="list-style-type: none"> • Links to any existing community based strategies; • Tobacco use cessation; • Alcohol consumption advice. <p>(Also see Infection Control, Patient, Public and Environmental Safety)</p>
<p>7. Clinical records, patient privacy and confidentiality C9, C13, C20</p>	<ul style="list-style-type: none"> • Staff awareness of and compliance with Data Protection Act 1998 • Caldicott Guidelines 1997, Access to Health Records 1998 and Confidentiality Code of Practice 1998 are followed • Confidentiality policy Satisfactory arrangements for confidential discussions with patients • Data protection policy
<p>8. Staff Involvement and Development (for all staff) C5, C7, C8, C10 C11, C21, C24, D7, D12</p>	<ul style="list-style-type: none"> • Employment policies – appropriate job descriptions for all posts • Appraisal, personal development plans and links to mentoring schemes • Appropriate staff training undertaken and records of staff training maintained (e.g. customer training, equal opportunities, dealing with complaints and patient feedback) • Records of practice meetings and evidence of staff involvement • Protected time for staff meetings and clinical governance • Confidential process for staff to raise concerns about performance • Links to a local Practitioner Advice and Support Scheme (PASS) or similar • Evidence of regular basic life support training • Evidence that staff opinion is sought about practice matters (e.g. staff surveys, practice meeting)

Theme	Requirements - key actions and policies
9. Clinical Staff Requirements and Development C4, C5, C10, C11	(Items listed under Staff Involvement and Development also apply) All GDC requirements are met including: <ul style="list-style-type: none"> • GDC registration/enrolment where appropriate • Supervision of clinical staff • Continuing Professional Development requirements • Handling of complaints • Dealing with poor performance (including “whistle blowing” policy)
10. Patient Information and Involvement C3, C7, C13, C14, C16, C17, C18, C19, C21, D2, D3, D5, D8, D9, D10, D11	<ul style="list-style-type: none"> • Patients’ and carers’ views on services are sought and acted upon • Patients have opportunities to ask questions and provided with sufficient information to make informed decisions about their care • Patient information leaflets are available in languages appropriate to the local population • Well-publicised complaints system that is supportive of patients • Other patient feedback methods are available (e.g. suggestion boxes) • Evidence that practice have acted on findings of patient feedback • Information for patients on how to access NHS care in and out of hours
11. Fair and accessible care C7, C13, C18, C19, C21, D11	(Items listed under Patient Information and Involvement may also apply) <ul style="list-style-type: none"> • Compliance with the Race Relations (Amendment) Act 2000 and Human Rights Act 1998 • Access to interpreting services • All reasonable efforts made to comply with the Disability Discrimination Act 1995 • Emergency/urgent appointments available during the day
12. Clinical Audit and Peer Review C5, D1, D3, D4, D5	<ul style="list-style-type: none"> • All staff involved in identifying priorities for and involved in clinical audit or peer review • Evidence of compliance with any locally agreed requirements for clinical audit or peer review • Evidence that changes have been made where necessary, as a result of clinical audit or peer review

Supporting information

Theme	Sources of information	Suggestions for evidence	Monitoring process	Progress
1. Infection Control C1, C4, C10, C20, C21, D1, D12, D13	BDA/DH advice sheet A12 (Infection control in dentistry) GDC Standards for Dental Professionals 2005 BDA Practice Compendium – model policies	Written practice policy Staff training records Audit outcomes	Self-assessment Surgery visit	
2. Child Protection C2, C6, C10	CRB website: www.crb.gov.uk NHS guidance ¹ Local Safeguarding Children Board Procedures Child protection and the Dental Team, book and www.cpd.org.uk due May 2006 COPDEND.	Practice policy on child protection Staff employment records & records of training Team meeting notes	Self-assessment Surgery visit	
3. Dental Radiography C1, C11, C24	IRR 1999 and IR(ME)R 2000 BDA Advice sheet A11(radiation in dentistry) NRPB Guidance Notes for Dental Practitioners: http://www.hpa.org.uk/radiation/publications/misc_publications/dental_guidance_notes.pdf Radiation Protection Adviser Selection Criteria for Dental Radiography, FGDP	Ionising radiation policy Staff training records Audit findings Local rules Radiation protection file	Self-assessment Surgery visit	

¹ Available at: http://www.nhsemployers.org/EmploymentPractice/protection_of_children.asp

Theme	Sources of information	Suggestions for evidence	Monitoring process	Progress
<p>4. Staff, Patient, Public and Environmental Safety C1, C4, C5, C20, C21, D12</p>	<p><i>Seven Steps to patient Safety</i> – NPSA: www.npsa.nhs.uk/sevenstepsBDA Advice note 53 (amalgam separators) RIDDOR Regs 1995 Health and Safety (First Aid) Regs 1981 MHRA safety notices (bulletins are posted on BDA website: www.bda-dentistry.org.uk) MHRA Regulations DPF/BDA advice sheet B9 (Prescribing in general practice) GDC guidelines Medicines Control Agency (MCA) Health and Safety at work Act 1974 BDA Advice sheet A3 (Health & Safety law for dental practice) CoSHH Regulations 2002 BDA Advice sheet A5 (Risk assessment in dentistry) Management of Health and Safety at Work Regulations 1999 BDA Advice sheet D14 (Violence at work) Carriage of Dangerous Goods and Use of Transportable Pressure Equipment (Amendment) Regulations 2005</p>	<p>Appropriate written policies Records of staff training Notes of team meetings Process to report and notes of any incidents</p>	<p>Self-assessment Surgery visit</p>	
<p>5. Evidenced-Based Practice and Research C1, C3, C5, C12, D2, D11</p>	<p>NICE guidance^{2,3} Faculty of Dental Surgery guidance http://www.rcseng.ac.uk/fds/docs Scottish Intercollegiate Guidance Network http://www.sign.ac.uk/guidelines/published/index.html Local referral protocols (where exist) Local research ethics committees</p>	<p>Clinical records Outcomes of audits Notes of team meetings</p>	<p>Self-assessment Surgery visit</p>	
<p>6. Prevention and Public Health C22, C23, D13</p>	<p>BDA/NHS/HDA: <i>Helping smokers stop: A guide for the dental team</i> (2004). Available at: www.publichealth.nice.org.uk/page.aspx?o=502735 <i>Scientific Basis of Oral Health Education</i> (Levine and Stillman-Lowe, 2004) National/local oral health strategy www.dh.gov.uk/assetRoot/04/12/32/53/04123253.pdf</p>	<p>Patient records review Notes of team meetings Practice policies Audit of implementation</p>	<p>Self-assessment Surgery visit</p>	

² Guidance for third molars: <http://www.nice.org.uk/page.aspx?o=38040>

³ Guidance for recall intervals: <http://www.nice.org.uk/page.aspx?o=225866>

Theme	Sources of information	Suggestions for evidence	Monitoring process	Progress
<p>7. Clinical records, patient privacy and confidentiality C4, C9, C13, C20</p>	<p>Clinical Examination and Good Record Keeping: Good Practice Guidelines, FGDP GDC Standards for Dental Professionals 2005 Professional indemnity insurers advice (DDU, DPS, MDDUS) BDA Advice Sheet B2 (Data protection) Data Protection Act 1998 Caldicott guidelines 1997 www.informationcommissioner.gov.uk Records Management: NHS code of practice www.nhsia.nhs.uk/infogov/igt</p>	<p>Records of staff training Storage of records Facilities for confidential discussions and telephone calls to patients</p>	<p>Self-assessment Surgery visit</p>	
<p>8. Staff Involvement and Development (for all staff) C5, C7, C8, C10 C11, C21, C24, D7, D12</p>	<p>GDC – Standards for Dental Professionals 2005 NHS(GDS) Complaints Regulations 2004 BDA Advice sheet B10 (Handling Complaints) http://www.nhs.uk/England/AboutTheNhs/ComplainCompliment.cmsx BDA Advice sheet E10 (CPD, clinical governance, audit and peer review) Postgraduate Dental Office <i>Personal Development Plans for Dentists</i> (Amar Rughani et al) CPD – A guide for the Dental Team (BDA) BDA advice sheet D12 (staff recruitment) www.investorsinpeople.co.uk BDA Advice sheet D13 (Discrimination) Equal Opportunities Commission. www.eoc.org.uk</p>	<p>Records of appraisals and PDPs Complaints policy Records of staff training Certificates for basic life support training Team meeting notes</p>	<p>Self-assessment Surgery visit</p>	
<p>9. Clinical Staff Requirements and Development C4, C5, C10, C11</p>	<p>GDC - Standards for Dental Professionals 2005 Principles of Patient Consent 2005 BDA Advice sheet B10 (Handling Complaints) http://www.nhs.uk/England/AboutTheNhs/ComplainCompliment.cmsx</p>	<p>Policy on complaints Recording of complaints Notes of team meetings</p>	<p>Self-assessment Surgery visit</p>	

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<p>10. Patient Information and Involvement C3, C7, C13, C14, C16, C17, C18, C19, C21, D2, D3, D5, D8, D9, D10, D11</p>	<p>GDC - Standards for Dental Professionals 2005 GDC - Principles of Patient Consent 2005 Local patient & public involvement (PPI) strategy (where exist) BDA Practice Compendium BDA Clinical Governance toolkit GDS/PDS Regulations draft 2006 BDA Advice Sheet B10 Handling Complaints http://www.dh.gov.uk/PolicyAndGuidance/OrganisationPolicy/ComplaintsPolicy/fs/en http://www.nhs.uk/England/AboutTheNhs/ComplainCompliment.cmsx BDA advice sheets B1 (Ethics in dentistry) BDA advice sheet A6 (Marketing in dentistry) PCT access action plans and NHS Direct National Clinical Governance support team website: www.cgsupport.nhs.uk</p>	<p>Patient surveys Other feedback mechanisms Patient information leaflets Policy on complaints Recording of complaints Notes of team meetings Patient notices on out-of-hours care</p>	<p>Self-assessment Complaints returns Surgery visit</p>	
<p>11. Fair and accessible care C7, C13, C18, C19, C21, D11</p>	<p>www.homeoffice.gov.uk BDA Practice Compendium BDA Advice Sheet D13 (Discrimination) www.disability.gov.uk DDA information at pack@meads.ltd.co.uk Disability Rights Commission Royal Association for disability and rehabilitation Local PCT services www.languageline.co.uk Equal Opportunities Commission. www.eoc.org.uk</p>	<p>Complaints monitoring Patient survey findings Practice/clinic policies</p>	<p>Self-assessment Complaints returns Surgery visit</p>	
<p>12. Clinical Audit and Peer Review C5, D1, D3, D4, D5</p>	<p>Local audit/peer review panel or other local arrangement Dental Practice Advisor (DPA)/PCT Tutor/Audit Facilitator Postgraduate Dental Office</p>	<p>Audit reports Team meeting notes</p>	<p>Self-assessment Surgery visit Returns to PCTs</p>	

Glossary of terms

BDA	British Dental Association
CoSHH	Control of Substances Hazardous to Health
CPD	Continuing Professional Development
CRB	Criminal Records Bureau
BNF/DPF	British National Formulary/Dental Practitioners' Formulary
DCPs	Dental Care Professionals (formerly known as Professionals Complementary to Dentistry)
DDA	Disability Discrimination Act
DDU	Dental Defence Union
DPA	Dental Practice Adviser
DPS	Dental Protection Society
FGDP	Faculty of General Dental Practice
GDC	General Dental Council
HDA	Health Development Agency
MHRA	Medical Healthcare Products Regulatory Agency
IRR	Ionising Radiation Regulations
IRR(ME)R	Ionising Radiation (Medical Exposure) Regulations
MCA	Medicines Control Agency
MHRA	Medical Healthcare Products Regulatory Agency
MDDUS	Medical Defence Union of Scotland
NRPB	National Radiological Protection Board (now part of the Health Protection Agency)
PASS	Practitioner Advice and Support Scheme
PDP	Personal development plans
PPI	Public and Patient involvement
VDP	Vocational Dental Practitioner

*For further primary care resources, visit:
www.primarycarecontracting.nhs.uk*