

Quality and Safety Assurance in General Dental Services in Wales

Introduction

This document outlines the key systems and processes in place for quality and safety assurance in general dental services (GDS) in Wales.

It replaces WHC (2006) 051 - Clinical Governance of Primary Dental Care Services.

It is designed as an online resource which will be updated periodically to ensure it remains relevant and useful for health boards, the dental profession and others with an interest in quality and safety.

Action

Health Boards are asked to take note of and use this guidance. In doing so they are advised to:

- Share it with the Board, the Quality and Safety Committee, the Audit Committee and other key assurance committees to provide them with up to date information on the systems and processes in place for quality and safety assurance in general dental services (GDS) in Wales.
- Ensure that it informs health board quality and safety assurance systems and is used by health board personnel working with general dental services.
- Identify a suitable health board group, such as a Dental Quality and Safety Group which will collate and discuss evidence relating to quality and safety assurance in GDS and ensure adequate mechanisms are in place to communicate the findings of this group to the Quality and Safety Committee, Primary Care Leads/Head of Primary Care and ultimately a named Executive Director and the Board.
- Work with providers of GDS services regarding issues relating to quality and safety. Annual contract review meetings should include discussion of patient safety and quality improvement within the practice, in addition to administration of the dental contract.
- Maintain clear and transparent processes for the management of GDS contracts and the identification, investigation and management of dental professionals whose performance is causing concern.
- Receive professional advice from Dental Practice Advisors (DPAs) as laid out in [WHC \(2008\) 057 - Provision of Dental Public Health and Dental Practice Advice to Local Health Boards and other NHS Organisations in Wales](#).
- Continue to work collaboratively with other agencies such as Healthcare Inspectorate Wales (HIW), NHS Wales Shared Services Partnership

(NWSSP) Primary Care Services, General Dental Council (GDC), NHS Business Services Authority (NHSBSA), Community Health Councils and the Wales Deanery to share information relating to quality and safety assurance.

- Work with their Consultant in Dental Public Health to receive objective evidence based advice on quality and safety issues as well as dental public health advice.
- Liaise with wider Public Health Wales teams to assess risk to patients and put in place appropriate measures to prevent patient harm if they identify health protection issues relevant to GDS.
- Outline in Local Oral Health Plans how they intend to embed quality and safety assurance within service planning, describe monitoring procedures currently in place and outline action to be taken if concerns arise. This in turn should inform Health Boards' Integrated Medium Term Plan (IMTP).
- Include issues relating to quality and safety assurance in GDS on appropriate risk registers and ensure accountability and responsibility for the management of risk is clearly recorded.
- Include issues relating to GDS Primary Care in Annual Reports (particularly the Primary Care report) and Annual Quality Statements.

Frameworks for quality and safety assurance within NHS Wales

The [Health and Care Standards](#) (2015) set out the Welsh Government's framework of standards to support the NHS and partner organisations in providing effective, timely and quality services across the NHS in Wales.

The [Governance e-Manual](#) supports NHS organisations in defining, implementing and maintaining their governance arrangements. It provides direction, guidance and support to Board members and NHS staff to enable them to fulfil their own responsibilities and ensure their organisations meet the standards of good governance set for the NHS in Wales. The manual provides detailed information to support delivery of the Health and Care Standards including issues relating to dental services.

All Welsh health organisations work to a shared quality assurance framework, [Safe Care, Compassionate Care: A National Governance Framework](#). This sets out the responsibilities of health care bodies and outlines what needs to be in place to seek and provide assurance about the quality and safety of health care services.

[Putting Things Right](#) is NHS Wales' integrated processes for the raising, investigation of and learning from concerns. All patient safety incidents, concerns or complaints relating to NHS GDS services in Wales should be dealt with in line with this guidance.

Registration of dental professionals in the UK

The [General Dental Council](https://www.gdc-uk.org/) (GDC) is the statutory body which regulates dental professionals in the UK. It maintains registers of qualified dental professionals; sets and enforces standards of dental practice and conduct; assures the quality of dental education; and investigates complaints. All clinical members of the dental team must register with the GDC including dentists, dental therapists, dental hygienists, dental nurses, orthodontic therapists, clinical dental technicians and dental technicians. Their roles are described in the GDC's Scope of Practice:

<https://www.gdc-uk.org/professionals/standards/st-scope-of-practice>

The GDC's Standards for the Dental Team:

<https://www.gdc-uk.org/professionals/standards/team> sets out the standards of conduct, performance and ethics that govern dental professionals.

Health boards who have serious concerns about the performance, conduct, or health of a dentist or dental care professional should consider if it is necessary to forward this concern to the GDC and if so, to contact the GDC promptly.

Regulation of dental professionals providing GDS in Wales

Dental Performer Lists

All health boards must maintain a list of dentists registered to provide NHS primary dental services as outlined in The National Health Service (Performers Lists) (Wales) Regulations 2004 and subsequent amendment. Inclusion and removal of dentists onto and off the Dental Performers Lists is undertaken by NHS Wales Shared Services Partnership (NWSSP). In order to be included on a Dental Performers List, practitioners must have an Enhanced Disclosing and Barring Service Disclosure and two recent clinical references. Health boards should work with each other, NWSSP and equivalent organisations nationally and internationally to share concerns and information regarding dental professionals.

Private dental practitioner registration

Under the Care Standards Act 2000 and The Private Dentistry (Wales) Regulations 2017, all dental practices undertaking any private or non-NHS funded work in Wales are required to register with HIW. In this respect "dental practice" includes practices with dentists and DCPs and private direct access practices run by DCPs.

HIW and the Welsh Government have published guidance for practices on the new Regulations:

<http://hiw.org.uk/providing/registerwithus/registerapractice/?lang=en>

The link includes information on registering the practice to provide private services, the application form and guidance on completing the form.

Additional guidance on quality and safety aspects is available at this link:

<http://gov.wales/topics/health/professionals/dental/publication/information/regulation/?lang=en>

Quality and safety assurance in GDS

Inspection of dental practices

[HIW](#) provides the public with independent and objective assurance of the quality, safety and effectiveness of healthcare services and makes recommendations to healthcare organisations to promote improvements. In September 2014 HIW commenced a 3-year programme of inspection of all general dental practices in Wales. Inspections are conducted by a dentist peer reviewer and an HIW inspection manager and are guided by a HIW workbook.

During each inspection, HIW review practices against the Health and Care Standards 2015:

- Quality of the patient experience;
- Delivery of safe and effective care; and
- Quality of management and leadership.

HIW inspection reports are published [online](#). If improvements are required, HIW provides practices with an outline quality improvement plan which includes the action to be taken, the responsible officer and the timescale for action. Practice teams are responsible for completing the improvement plan and assuring HIW that they have done so.

Health boards should ensure they have systems in place to check reports when they are published and to act appropriately if the report raises concerns about an NHS practice which has a contact with the HB.

If serious patient safety concerns are identified, HIW will issue the practice with an Immediate Assurance (IA) letter which is copied to the health board CEO, Chair and patient safety lead. Health boards should have systems in place to ensure any IA letters are forwarded in a timely manner to primary care dental leads and DPAs as a minimum. Whilst the practice is responsible for correcting the issues, health boards should have systems in place to assess whether they need to seek assurance from the practice as a priority.

HIW have issued health boards with a flow chart to describe the IA letter processes.

HIW publishes an annual report of findings of General Dental Practice Inspections summarising findings from inspections and highlighting areas for improvement. This informs Wales Deanery's [Practice Quality Improvement Programme](#). Examples of Deanery products to support practices include a patient experience feedback questionnaire and a Radiological Standards checklist.

GDS contract management

[NHS Dental Services, NHS Business Services Authority \(NHSBSA\)](#) provides a range of services to HBs to support the monitoring and risk management of NHS dentistry.

E-Reporting is a secure online web-based reporting facility which collates information from CoMPASS and the FP17W and FP17OW activity reports enabling HBs to analyse and query data relating to GDS contract activity.

NHSBSA also produces quarterly exception and vital signs reports to assist health boards in monitoring GDS contracts and identifying areas of activity which may be cause for concern.

The E Reporting system is being decommissioned during 2018 and replaced in early 2019 with the new eDEN reporting system (which will also include data currently available from CoMPASS, quarterly and vital signs reports). The opportunity is being taken to review and refresh all reporting output and to consider enhanced and improved functionality.

NHS Regulations require that HBs provide all contract holders with an annual report on performance and undertake an annual end-of-year review.

Quality assurance self-assessment (QAS)

The QAS for Dental Practitioners is an all-Wales self-assessment tool designed for use within NHS dental practices developed by the All Wales Dental Public Health Team in conjunction with the Primary Care Quality and Information Service of Public Health Wales and HIW. Its key purpose is to support dental practitioners to comply with the NHS contractual requirement to submit an annual quality assurance report, although HIW has also used a version of the QAS with wholly private practices. A revised version of the QAS was issued in 2017; it requires practices to describe how they meet the standards and prompts the team to consider where improvements are needed.

The QAS is completed on an annual basis by NHS dental providers, with non-respondents followed up by DPAs. It encourages practices to reflect and assess the quality and safety assurance systems they have in place in order to facilitate safe and effective clinical practice. Results are compiled into an annual report sent to the Welsh Government and local reports sent to health boards. Health Boards may provide practice QAS report to HIW to inform practice inspections.

The health board DPAs will alert health boards to areas of concern in a practice QAS (red flag issues) such as a failure to comply with specific cross infection control measures. Health boards must have systems in place to ensure practices address these issues and take prompt steps to rectify problems.

In-practice quality assurance system

As outlined in [The National Health Service \(General Dental Services Contracts\) \(Wales\) Regulations 2006](#) all dental practices holding a GDS contract are required to have a practice-based quality assurance system in place to monitor and if necessary, improve the quality and safety of care provided. This should ensure:

- Effective measures of infection control are used;
- All legal requirements relating to health and safety in the workplace are satisfied;
- All legal requirements relating to radiological protection are satisfied; and
- Any requirements of the GDC in respect of the continuing professional development of dental practitioners are satisfied.

Use of the QAS allows all NHS dental contract holders to comply with these requirements for a practice based quality assurance system.

In addition, contractors must comply with any local arrangements for assuring quality and safety that health boards may establish.

Patient complaints, concerns and incidents

Patient concerns may be recruited by the dental practice, health board or community health council. Each service should have a robust system for recording, investigating and responding to incidents aligned to the advice provided in [‘Putting Things Right’](#).

Dental Quality and Safety Group

Health boards receive quality and safety information about GDS from a range of sources. To ensure this information is brought together to build up a picture of quality and safety within a practice, Health Boards should consider establishing a Dental Quality and Safety Group if this does not currently exist. The Group acts as a professional advisory group informing and supporting the Medical Director as part of the health board’s system of assurance and clinical risk management strategy.

The role of Dental Quality and Safety groups is described in a CDO letter:

<http://gov.wales/docs/phhs/publications/150820letteren.pdf>

The Welsh Government has published guidance to assist health boards and dentists in the provision of safe, effective and quality dental care. Delivering NHS Dental Services More Effectively can be accessed [here](#).

Management of dentists whose performance is of concern

In June 2018 the Welsh Government published WHC 2018 (019): *Getting the Balance Right in Wales – supporting quality and safety for dental registrants as part*

of an assurance process. It sets out the model we want to adopt in Wales to give patients, the public, the dental profession, health boards and the GDC confidence that dental performance which causes concern can be identified promptly and dealt with proportionately to protect patients and support GDC registrants.

The WHC can be accessed at:

<https://gov.wales/docs/dhss/publications/whc2018-019en.pdf>

The WHC replaces WHC 2005 (086) and the subsequent guidance issued in 2012: a model operating procedure for the identification, investigation and management of dentists on the Dental Performers List whose performance is of concern.

In addition, the [Dental Professional Support Unit](#) of Wales Deanery offers a system to support individuals who are:

- Subject to conditional inclusion on the performers list in Wales professional support services to practitioners; or
- Subject to remediation due to performance related issues.

Cases of suspected fraud should be referred directly to Local Counter Fraud services which will support the health board as appropriate.

National Clinical Assessment Service (NCAS)

The National Clinical Assessment Service (NCAS) is an integral part of NHS Resolution - a national service which contributes to patient safety by helping to resolve concerns about the practice of doctors, dentists and pharmacists: resolution.nhs.uk

NCAS provide expert advice and support, clinical assessment and training to the NHS and other healthcare partners and are available to support health boards which have concerns about dentists in their area.

Health Education and Improvement Wales (HEIW)

HEIW will incorporate the Dental Deanery in October 2018: <http://www.heiw.wales/>

The Dental Deanery will continue its role in professional support services and postgraduate education and training for the dental team. It has developed the [Practice Quality Improvement Programme](#), a suite of tools which includes:

- Maturity Matrix Dentistry (MMD), a whole-practice development tool facilitated by a Practice Development Tutor;
- Clinical Audit and Peer Review (CAPRO) scheme, a programme of clinical audit which encourages the dental team audit existing patterns of care

against established standards to identify and implement improvements to their way of working;

- Three national clinical audits (with others in development)
 - Disinfection and decontamination (infection control)
 - Antimicrobial prescribing
 - Smoking cessation;
- Patient experience feedback system;
- A checklist for safe practice in radiography (X-rays);
- In-practice training;
- Practice and personal development planning and;
- Designed to Smile in practice QI tool.

Improving Quality Together (1000 Lives)

Improving Quality Together (IQT) describes ways in which all dental team members can contribute to quality improvement in the dental practice.

The [Quality Improvement Guide for dental teams](#) outlines IQT for all members of the dental team - providing information on skills and techniques that can be used to introduce improvements into practice and improve patient care.

Evidence based prevention of oral disease

Delivering Better Oral Health is an evidence-based toolkit to support dental teams to deliver preventive dental care. Hard copies have been provided to all dental practices in Wales and it is available [here](#).

Safeguarding

The [All Wales Safeguarding Children Supervision Strategy 2014](#) provides a safeguarding supervision framework which can enable NHS organisations in Wales to develop and maintain a confident and competent workforce in safeguarding and promoting the welfare of children.

In 2016 PHW published updated Guidance for Dental Teams on Safeguarding Children & Adults at Risk:

www.wales.nhs.uk/sitesplus/888/pendoc/307196

Production of this guidance was led by the PHW safeguarding lead GP with input from dental team members. At present it is available in English only.

Health boards have been asked to circulate this link to dental practices together with the telephone number and other contact details for your local safeguarding leads. To ensure dental teams know “who to contact and how” if they have safeguarding concerns.

The Dental Deanery provides safeguarding training and e-learning modules which are available on Learning Wales:

<https://dental.walesdeanery.org/dental-courses/practice-resources>

Risk of transmission of Blood Borne Viruses (BBV)

Healthcare workers (HCW) who carry out Exposure Prone Procedures (EPP) are at greater risk of acquiring or passing on BBV to patients or other HCW.

In 2017 the Welsh Government published WHC 2017/045 – *Integrated guidance on health clearance of healthcare workers infected with blood borne viruses (Hepatitis B, Hepatitis C and HIV)*:

<http://extranet.wales.nhs.uk/howis/whcirculars.cfm?search=healthcare+workers>

In 2016 UKAP published [General dentistry exposure prone procedure \(EPP\) categorisation](#), a copy of which has been sent to dental practices in Wales.

Good Practice in Disinfection and Decontamination is described in WHTM 01-05:

Decontamination in primary care dental practices and community dental services
Published by NHS Wales Shared Services Partnership it can be accessed at this link:

<http://www.nwssp.wales.nhs.uk/welsh-health-technical-memoranda-whtms/>

Supporting dental teams to provide high quality and effective care

The CDO and her team publish guidance and letters to support dental teams.

Examples include advice on use of amalgam following a change to Mercury Regulations and Preventive dental advice, care and treatment for children from 0-3 years.

The CDO web site can be accessed here:

<https://gov.wales/topics/health/professionals/dental/?lang=en>

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