

17<sup>th</sup> December 2015.

Thank you for the opportunity to respond to the Consultation document for the proposed Infection Prevention and Control Practice Standard.

**Q1. Do you agree/ disagree with the proposed Infection Prevention and Control Practice Standard? If you disagree please detail why.**

Yes I agree with the standard in general.

**Q2. Does any element of the proposed Infection Prevention and Control Practice Standard require further clarification or further guidance? Please explain.**

I do not agree with the following statements;

-Non registered staff and students- the Dental Council strongly **recommends** that all students and non registered clinical staff follow the Infection.... I would like to see the word **recommend** be replaced with **requires**. However I suspect it is worded in that way because legally the Dental Council cannot require non registered members to follow a practice. Is this correct?

- Vaccination- the Dental council strongly **recommends** that all oral health practitioners, students and non registered staff follow MOH immunization guidelines..... I would like to see the word **recommend** be replaced with **requires**. However I suspect it is worded in this way for a reason. Further clarification may be needed

- “not passing sharp instruments between staff members” needs further clarification as to what exactly is a sharp instrument

**Q3. Do you have any further comments on the proposed Infection Prevention and Control Practice Standard?**

- The recommendation that alcohol based hand rubs (ABHR) is the preferred method of hand hygiene when hands are not soiled may **not** be met favourably by some practitioners. A number of practitioners report increased skin allergies/ dermatitis with the use of ABHR.

- Implementation of this Practice standard may be of considerable cost to DHB's with the requirement of the following;

-anti retraction valves on all dental equipment with waterlines

-data recording devices and/or printers for steam sterilisers

However I believe this is necessary to protect the public.

Kind regards

Gillian Tahi Dental Therapist.