

**Marie MacKay**

Chief Executive

Dental Council

[consultations@dcnz.org.nz](mailto:consultations@dcnz.org.nz)

9 September 2024

Tēnā koe Marie,

**RE: NZOHA Response to Consultation on Proposed Infection Prevention and Control Practice Standard**

Te Ohu Pūniho Ora o Aotearoa – the New Zealand Oral Health Association Inc (NZOHA) is the organisation representing over 1,000 registered oral health therapists, dental therapists, and dental hygienists. Our members are dedicated professionals working tirelessly across both the public and private sectors throughout Aotearoa. Founded to advocate for and elevate the oral health therapy, dental therapy, and dental hygiene professions, NZOHA strives to enhance their professional stature and safeguard their interests.

Our association proudly traces its roots back to the pivotal establishment of the School Dental Service and the training of School Dental Nurses in 1921. This legacy continued with the integration of dental hygiene in the 1970s and has evolved to include today's trained oral health therapists who serve across the public (Te Whatu Ora - Health New Zealand) and private sectors nationwide.

NZOHA members are integral to the Community Oral Health Service (COHS), providing essential dental care and education in kōhanga reo, early childhood education centres, kura kaupapa Māori, primary, and intermediate schools across the country, ensuring a foundation of oral health for future generations.

On behalf of NZOHA, we appreciate the opportunity to provide feedback on the proposed Infection Prevention and Control Practice Standard<sup>1</sup>. Our response reflects the collective

---

<sup>1</sup> <https://dcnz.org.nz/assets/Uploads/Consultations/2024/IPC/Infection-prevention-and-control-practice-standard-consultation-Aug24.pdf>

insights of our members, who are committed to ensuring the highest standards of oral health care in Aotearoa New Zealand.

**Q1. Agreement with the Proposed Standard:**

NZOHA agrees with the overall direction and updates proposed in the new Infection Prevention and Control Practice Standard. We recognise the importance of keeping our practice standards in line with international guidelines and appreciate the efforts of the Council and the Cross Infection Working Group to ensure that our national standards reflect current best practices.

**Q2. Areas Requiring Clarification or Further Guidance:**

While we support the updates, we suggest further clarification in the following areas:

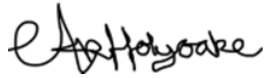
- **Standard 15 (Batch Control Identification for Critical Items):** While uplifting this requirement from guidance to a standard enhances transparency and safety, further specifics on how practices might efficiently integrate this into their existing patient record systems without significant disruption could be beneficial.
- **Standard 19 (Reprocessing Equipment Requirements):** The transition to requiring data recording devices on all steam sterilisers is noted. Additional guidance on acceptable types of data recording devices and how small practices can comply without incurring prohibitive costs would be helpful.

**Q3. Additional Comments:**


NZOHA also wishes to highlight the importance of environmental sustainability in infection control practices. We support the inclusion of sustainability considerations and encourage the Council to integrate more detailed guidelines on how practices can balance effective infection control with environmental responsibility. This is particularly relevant in the selection and disposal of single-use items and the use of chemicals and water.

We commend the Council's efforts to incorporate feedback from a wide range of stakeholders and are particularly appreciative of the inclusive approach taken in drafting these standards.

Ngā mihi



Anna Holyoake  
President Tūmuaki



Samuel Carington  
Vice-President Tūmuaki Tuarua

On behalf of the NZOHA Executive