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**Q1**

Personal details

First name	<b>Philip</b>
Last name	<b>Sussex</b>
Email	

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**Q2** **Dentist or dental specialist**

In what capacity are you making this submission?

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**Q3** **Respondent skipped this question**

Company/organisation name

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**Q4**

Please enter your Dental Council Person ID/registration number

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**Q5** **Agree**

Do you agree/disagree with the proposed Infection Prevention and Control Practice Standard?

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**Q6**

Does any element of the proposed Infection Prevention and Control Practice Standard require clarification or further guidance?

Yes. Please specify::

Overall the clinical leadership team at Nelson Marlborough COHS are happy with the draft infection control practice standard but would feed back on the following points: There are a number of times this standard uses the term "periodic" for testing and validation but fails to specify how often; it could be argued that daily, monthly and 10-yearly are all "periodic" but compliance costs and efficacy of such approaches would vary widely. Page 33 section 13 bullet point 2 - how does DCNZ define "adequate ventilation"? Some will interpret this as simply opening a window which our ICP staff would strongly dispute.... Is adequate ventilation actually an issue if automated prewashing is being utilised? We understood this is an issue only for manual washing (something we don't do and would support DCNZ mandating). While we strongly agree with the decision to use soil testing as an appropriate surrogate for volumetric testing, we note that none of the washers used by Te Whatu Ora Nelson Marlborough (and likely NZ) could meet the flowing bullet point from page "Check for each cycle that the time maintained at the thermal disinfecting temperature was not less than specified, and document this" and would ask that this be removed. Appendix B in column 2 says Time/Temperature achieved however we think this should be changed simply to 'Temperature Achieved'. All our washers simply say at the end of a cycle the temperature achieved but not the time..... Additionally, we note that none of the washers which we use, provide a cycle number and yet in Appendix B you require this.... perhaps this is something the next generation of washers provide but we would be unable to achieve compliance on this point at present. Please reconsider this requirement. thanks, Phil

**Q7**

Do you have any further comments on the proposed Infection Prevention and Control practice standard?

No

**Q8**

Select choose file to attach any supporting documentation to your submission

Respondent skipped this question