To whom it may concern,

Re: Public consultation on draft guidelines for registered dental, medical, nursing and midwifery, paramedic and podiatric practitioners and students in relation to blood-borne viruses

Thank you for the opportunity to provide feedback for the public consultation on the Draft Guidelines for registered health practitioners and students in relation to blood-borne viruses.

The Dental Hygienists Association of Australia Ltd (DHAA) is the peak professional body representing dental hygienists, dental therapists, oral health therapists and oral health students in Australia. Our members work in both private and public sectors, covering both general and specialist dental practices across Australia. DHAA provides support and advice to its members, and collaborates with other health professional groups to strive for better access and optimal dental care for all Australians.

DHAA notes the risk to both practitioners and patients when health practitioners are treating patients with a blood-borne virus. We understand and agree with AHPRA’s proposal to adopt the CDNA Australian national guidelines for the management of healthcare workers living with blood borne viruses and healthcare workers who perform exposure prone procedures at risk of exposure to blood borne viruses.

Below are our responses to the five key questions from the public consultation:

1. Are the draft guidelines necessary?
   Yes, we support the board’s proposed guidelines to clearly state the obligations of practitioners to comply with the CDNA guidelines, and the responsibility for treating practitioners to notify the board, and the actions that the board may take to protect the public.

2. Is the content of the draft guidelines helpful, clear and relevant?
   Yes, we agree that the draft guidelines are relevant and provide clear instructions for practitioners.

3. Is there any content that needs to be changed, added or deleted in the draft guidelines?
   No, the guidelines is well set out with appropriate information.
4. **Do you agree with the proposal that the Boards expect registered health practitioners and students to comply with CDNA guidelines? That includes testing requirements set in the CDNA guidelines.**

Yes, we agree with the proposed guidelines and required testing. We reiterate the need for each case to be investigated thoroughly before allowing a practitioner/student to practice on patients.

5. **Do you have any other comments on the draft guidelines?**

We hope that this public consultation receives sufficient feedback from the general public. It is possible that many may not be agreeable to having a practitioner/student perform surgery/procedures on them knowing that the practitioner/student is a known carrier/sufferer of a communicable blood borne virus. Further education and public awareness campaign with the introduction of the guidelines may be beneficial.

Yours sincerely,

Bill Suen
Chief Executive Officer