

## **SUBMISSION Guidelines on Dental Records**

Dental Board of Australia via [dentalboardconsultation@ahpra.gov.au](mailto:dentalboardconsultation@ahpra.gov.au)

### **Martin Hall, Chief Oral Health Officer Dental Health Services Victoria**

Thank you for the opportunity to provide a submission on the Dental Board of Australia's (the Board) proposed changes to the Guidelines for Dental Records (the Guidelines).

24/01/2020

#### **1. Are the current guidelines necessary?**

Maintaining clear and accurate health records is essential for the continuing good care of clients.

The Code of Conduct defines the Board's expectations for dental practitioners' professional and ethical conduct including the expectations for dental record keeping.

Consolidating the existing Guidelines on Dental Records into the Code of Conduct would reduce the number of reference documents and eliminate areas of duplication while still maintaining the expected minimum requirements for dental record for dental practitioners.

If the current Guidelines on Dental Records were retired the Code of Conduct would then become the one document providing the overarching set of covering principles for professional conduct including record keeping. Consequently, specific details of record keeping are proposed to be managed through the Fact Sheet that is a reference resource to assist dental practitioners. The Fact Sheet would be much easier to update when any required changes in the details of record keeping need to occur.

In line with the Board's mandate and the National Law to protect the public there is adequate guidance within the Code of Conduct without the need to be overly prescriptive with additional guidelines. DHSV is committed to high standards of safe and quality care and has its own organisational policy and procedures on client record keeping. Using a risk based approach DHSV conducts annual dental record keeping audits to monitor and provide reassurance within a clinical governance framework that standards of are being met by practitioners and the overall organisation. It is at this level that a set of more prescriptive guidelines are used as benchmarks. DHSV procedures are regularly reviewed and these can be strengthened as required to align with and support the principles of the Code of Conduct.

#### **2. Do you agree with the proposal that the Board retires the current guidelines? That includes positioning the Code of conduct as the document to provide dental practitioners with guidance on health records management with supplementary information through a fact sheet.**

Yes and agree that the Code of Conduct should be the central source of standards and guidance to practitioners.

#### **3. Is the content of the fact sheet helpful, clear and relevant?**

The draft Fact Sheet mainly just reinforces compliance with the code of conduct as well as completing ongoing CPD and having professional indemnity insurance. It just reiterates the record keeping principles outlined in the Code of Conduct. I agree with the structural change of having the overarching Code of Conduct and a separate Fact Sheet for more detail but do not fully support the proposed content in the draft Fact Sheet.

#### **4. Is there any content that needs to be changed, added or deleted to the fact sheet?**

The current Guidelines on Dental Records is a fairly short document. The current guidelines could form much of the content of the Fact Sheet rather than reiterating what is already in the Code of Conduct. In that the Fact Sheet provides detail guidelines to assist practitioners on good record keeping listing information to be recorded. The consultation paper indicated that the Board do not want to be overly prescriptive, but it could be presented as a guide to assist practitioners under the status of a Fact

Sheet. This would assist organisations such as DHSV in being able to reinforce our own policies and guidelines on record keeping (by having a guiding standard resource from the Dental Board of Australia).