

31 October 2019

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

Submission by:

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Thank you for the opportunity to comment. I write as a public health physician who had involvement with implementing previous CDNA guidelines on this matter at state level.

1. Are the draft guidelines necessary?

Yes – it is appropriate to endorse and promulgate the CDNA guidelines through this mechanism.

2. Is the content of the draft guidelines helpful, clear and relevant?

Yes

3. Is there any content that needs to be changed, added or deleted in the draft guidelines?

The issue of confidentiality is a key one that could be mentioned briefly, as the conflict between maintaining that and reporting someone to the Board may be an immediate and important question for practitioners.

For example, in para 6.1 there could be reference to the default position being maintenance of patient confidentiality, as is usual; however in 6.3, the requirement to notify the Board supersedes confidentiality provisions.

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.

Absolutely. This is key to preventing iatrogenic BBV transmission.

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

No.