

## Review of Guidelines on infection control: public consultation

### Introduction

The Dental Board of Australia (the Board) wants to make it easier for practitioners to know and understand the professional expectations around infection prevention and control to help them practice safely.

As part of this, the Board is reviewing its *Guidelines on infection control*. The Board is consulting on whether to shift the information contained in the guidelines to more accessible and helpful tools and resources, such as a one-stop fact sheet and a self-reflective tool.

**Please ensure you have read the public consultation paper and attachments before answering this survey.**

### Publication of your responses

Please let us know if you would like your responses published.

- Yes, I would like my responses to be published
- Please do not publish my responses

### About your responses

Are you responding on behalf of an organisation?

- Yes
- No

### Submission contact details

First name

Last name

Which of the following best describes you:

- Dental practitioner
- Other health practitioner
- Member of the community
- Other (please describe)

The following questions will help us to gather information about the Board's proposal.

**Please ensure you have read the public consultation papers before responding.**

Q1. Which of the Board's proposed options do you prefer?

- Option 1 - keep and revise the guidelines
- Option 2 - replace the guidelines with other supporting resources
- Other

Q1. Why do you prefer Option 1 - keep and revise the guidelines?

The guidelines set out the standards to protect the public and can be used to formally discipline dental practitioners who breach them. Self-regulation has proven to be ineffective in this area.

Q2. If you prefer option 1, to keep and revise the guidelines, do you have any suggestions about the language, structure or content of the draft revised guidelines (**Attachment C**)?

Keep the guidelines as they are. Why is the Board proposing to revise them? What is not working with respect to the Guidelines that has prompted the Board to propose to alter them?

Q3a. Would replacing the guidelines with other supporting resources result in any unintended consequences or costs for **dental practitioners**?

- Yes
- No
- Other

Q3a. Please describe or quantify any unintended consequences or costs for **dental practitioners**.

It would create chaos and confusion to use a multiple range of resources. Keep it simple and use the extant Guidelines.

Q3b. Would replacing the guidelines with other supporting resources result in any unintended consequences or costs for **dental practices**?

- Yes
- No
- Other

Q3b. Please describe or quantify any unintended consequences or costs for **dental practices**.

Time spent collating various dispersed piecemeal resources located in various locations would be costly.

Q3c. Would replacing the guidelines with other supporting resources result in any unintended consequences or costs for **patients or consumers**?

- Yes
- No
- Other

Q3c. Please describe or quantify any unintended consequences or costs for **patients or consumers**.

The disciplinary functions associated with the existing Guidelines are intended to protect the public and punish or deter practitioners who do not adhere to them. ADA resources do not fulfil that function and they are not designed to protect the public. The ADA's role is to protect dental practitioners.

Q3d. Would replacing the guidelines with other supporting resources result in any unintended consequences or costs for **members of the community vulnerable to harm**?

- Yes
- No
- Other

Q3d. Please describe or quantify any unintended consequences or costs for **members of the community vulnerable to harm**

Practitioners who may be likely to breach the Regulatory Guidelines will not be deterred by ADA resources because ADA resources will have no consequences for practitioners who do not adhere to them.

Q3e. Would replacing the guidelines with other supporting resources result in any unintended consequences or costs for **Aboriginal and Torres Strait Islander Peoples**?

- Yes
- No
- Other

Q3e. Please provide more information about your answer.

The board has an obligation to consult with a diverse range of stakeholders, including Indigenous groups.

Q4. Do you have any suggestions about the language, structure or content of the draft revised fact sheet (**Attachment D**)?

- Yes
- No

Q5. Do you have any suggestions about the language, structure or content of the draft self-reflective tool (**Attachment E**)?

Yes

No

Q6. Do you have any other feedback about the Board's proposal?

If the Board propose to use Australian Dental Association (ADA) resources, as they propose(re: 22 September 2021 Q & A Briefing Session), it will lessen or remove the formal AHPRA disciplinary functions associated with the extant Guidelines [National Law]. The Board's proposal will result in a dimishment of scope to formally punish practitioners. Given the Board's proposal to replace the Guidelines with ADA resources, the Board has an obligation under AHPRA policies to disclose the ADA's Member professional indemnity insurance interests, or dispel any public perception of bias.