

## Appendix A

**General Dental Practice: Improvement Plan**

**Practice: Jamie Pugh Dental Health Ltd.**

**Date of Inspection: 18 February 2015**

Page Number	Recommendation	Practice Action	Responsible Officer	Timescale
	<b>Patient Experience</b>			
Page 7	<p>The NHS complaints process should be made more visible to patients and include details of the local CHC.</p> <p>The National Health Service (Concerns, Complaints and Redress Arrangements) (Wales) Regulations 2011- 4.8</p>	<p>The NHS complaints policy has been relocated from behind reception to in front of reception and font size has been increased.</p> <p>Details for CHC were added immediately day of inspection and were printed off and displayed.</p>	Mrs Tracy Pugh	Actioned
Page 7	<p>The practice is advised of the need to provide private patients with visible details of their right to bring concerns to the attention of HIW as required by The Private Dentistry (Wales) Regulations 2008.</p>	<p>Details for HIW have been added to the Private complaints handling policy and displayed</p>	Mrs Tracy Pugh	Actioned

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	The Private Dentistry (Wales) Regulations 2008-Regulation - 16 (2)			
<b>Delivery of Standards for Health Services in Wales</b>				
Page 9	<p>The practice must ensure that local rules are clearly displayed within each dental surgery. In addition, the practice radiation protection file must contain all information as required by current Regulations and NHS standards.</p> <p>Ionising Radiation (Medical Exposure) Regulations 2000</p> <p>NHS Standards- 3d, 4, 7a,16a,16f.</p>	<p>Local rules for x-ray machines are all located by each machine. For the purpose of inspection were removed for the paperwork to be inspected, however advised this was unnecessary and should never be removed from machine.</p> <p>Local Rules have been amended and added a diagram to indicate controlled area.</p> <p>An additional contingency protocol has been added regarding if film is exposed or if processor fails.</p> <p>Manuals for each machine have been printed and displayed by each machine.</p>	Mrs Tracy Pugh	Actioned
Page 9	<p>The practice is advised of the need to display appropriate warning signs in the areas of the practice where X ray equipment is used.</p> <p>Ionising Radiation (Medical Exposure) Regulations 2000</p> <p>NHS Standard- 1b</p>	<p>As the operator is located at the entrance and has visual control of access, our RPA advised no warning signal would be required (also previous x ray warning signal that was on surgery door was removed with door when practice was refurbished) However we have displayed new x ray signage for avoidance of doubt.</p>	Mrs Tracy Pugh	Actioned

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Page 10	<p><b>The practice is advised of the need to establish a system for formal audit activity/clinical evaluation of (X ray) image quality as required by the IR(ME)R 2000 Regulations and NHS Standard 6a.</b></p>	<p>In addition to quality grading each x ray image, we have introduced a policy that if computer audit falls below 90% class / grade 1, to assess a sub-group of 10-20 images every 6-12months in order to verify they are of adequate/satisfactory quality.</p>	Mrs Tracy Pugh	Actioned and review 6 monthly
Page 10	<p>The practice must ensure that hazardous waste is segregated in appropriate containers for disposal, in accordance with the Hazardous Waste (Wales) Regulations 2005 and NHS Standards 13d and 15a.</p>	<p>The practice/dental team had access to containers for specific hazardous substance (amalgam) and did so on the day of inspection and labelled. Rather than an agreement with Canon Hygiene to collect, we have since signed a maintenance amalgam collection agreement with Canon Hygiene to supply official containers and remove our amalgam waste regularly.</p>	Mrs Tracy Pugh	Actioned
Page 12	<p><b><u>Immediate Assurance Issue</u></b></p> <p>The practice is currently in breach of Section 11 of the Care Standards Act 2000. This is because you are carrying on an establishment without being appropriately registered.</p> <p>Specifically, during the course of our inspection on the 18 February 2015, we found that you were using a Class 4 laser product, without the practice being appropriately registered for its use. This was</p>	<p><b>This matter resulted in HIW sending an immediate assurance letter to the practice.</b></p> <p>Currently filling in paperwork to register dental practice as a hospital to use Class 4 laser. Keys to operate laser has been removed from premises.</p>	Mr Jamie Pugh	16 Weeks

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	<p>confirmed through exploration of the content of 10 recent patient records, three of which made reference to the use of the Class 4 laser at the premises.</p> <p>You must not continue to administer any further treatment using this product without being appropriately registered with HIW to do so.</p> <p>This registration is distinctly separate from your registration with HIW associated with The Private Dentistry (Wales) Regulations 2008. In order to operate a class 4 laser product you must comply with the requirements of the Independent Healthcare (Wales) Regulations 2011 and register the practice as an independent hospital.</p>			
Page 12	<p>The practice is required to provide HIW with evidence of a current and valid maintenance certificate with regard to the Class 4 laser unit.</p> <p>NHS Standards-1b, 16 a and 16 b.</p>	Waiting for appointment with Henry Schein to service laser	Mr Jamie Pugh	<p>Waiting for H Schein engineer.</p> <p>Within 16weeks (prior to reg as</p>

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				hospital)
Page 12	The practice is advised of the need to ensure that patients' records contain sufficient detail following dental consultations and treatment. This is in accordance with current NHS standards-7a, 7b, 7c and 9b.	Pop-up notes to be set up for both dentists to prompt to put dental health promotion in notes(not just verbal).  Both dentists to have pop-up (not just one dentist) to grade x-rays in x ray module on computer, currently typed in clinical notes not x ray module making audit difficult.	Mrs Tracy Pugh	2 Weeks
Page 13	The practice is advised of the need to ensure that there is recorded evidence of consideration of patients' new/updated medical histories by dentists.  NHS standard 7a.	Patients complete a medical history questionnaire using a clinipad (tablet). If patients require assistance, staff are always available to help. The patient must sign the document or it cannot be saved. The saved document then appears on patients' records immediately. The dentist reads the medical history update and then types in (and confirms) that the medical history checked within each patients' notes.	Mrs Tracy Pugh	Actioned
<b>Management and Leadership</b>				
Page 14	Staff should have access to timely appraisals to ensure they are supported in their roles and any training or performance needs can	Staff appraisals are nearly complete and will be carried out annually.	Mrs Tracy Pugh	2 weeks

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	<p>be identified and addressed.</p> <p>NHS standard 25e</p>			
Page 15	<p>The practice should ensure that complaints information complies with the NHS 'Putting Things Right' requirements and Regulation 16 of The Private Dentistry (Wales) Regulations 2008.</p>	<p>"Putting things right" document to be read and action any points.</p> <p>To ensure regular updates carried out.</p> <p>To carry out audits made available within 6months</p>	Mrs Tracy Pugh	<p>4 weeks</p> <p>Ongoing</p>
<b>Quality of Environment</b>				
Page 16	<p>The practice is advised of the need to relocate the OPT machine to an area where it can be operated safely.</p> <p>NHS standard 12d</p>	<p>Decontamination room which requires building work to be undertaken to relocate x ray machine from sterilising area. In the meantime, when a patient requires an OPT, wherever possible, this shall be scheduled when autoclave can be switched off at the mains.</p>	Mrs Tracy Pugh	<p>Within 2 years</p>

**Practice Representative:**

**Name (print):** ....Mrs Tracey Pugh.....

**Title:** ....Mrs.....

**Signature:** .....

**Date:** ....24/03/2015.....