

General Dental Practice Inspection (Announced)

Smileright Dental Clinic, Cardiff

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1. Introduction

Healthcare Inspectorate Wales (HIW) is the independent inspectorate and regulator of all health care in Wales.

HIW's primary focus is on:

- Making a contribution to improving the safety and quality of healthcare services in Wales
- Improving citizens' experience of healthcare in Wales whether as a patient, service user, carer, relative or employee
- Strengthening the voice of patients and the public in the way health services are reviewed
- Ensuring that timely, useful, accessible and relevant information about the safety and quality of healthcare in Wales is made available to all.

HIW completed an inspection to Smileright Dental Clinic Cardiff at first floor of Boots, 36 Queens Street, Cardiff on 7 July 2016.

HIW explored how Smile Right Dental Clinic Cardiff complied with the Private Dentistry (Wales) Regulations 2008 and the Private Dentistry (Wales) (Amendment) Regulations 2011 and other relevant legislation and guidance.

Dental inspections are announced and we consider and review the following areas:

- Quality of the Patient experience - We speak to patients (adults and children), their relatives, representatives and/or advocates to ensure that the patients' perspective is at the centre of our approach to how we inspect.
- Delivery of Safe and Effective Care - We consider the extent to which services provide high quality, safe and reliable care centred on the person.
- Quality of Management and leadership - We consider how services are managed and led and whether the culture is conducive to providing safe and effective care. We also consider how services review and monitor their own performance against relevant standards and guidance.

More details about our methodology can be found in section 6 of this report.

2. Context

Smileright Dental Clinic Cardiff provides services to patients in the Cardiff area.

Smileright Dental Clinic Cardiff provides private only dental services.

The practice staff team includes five dentists, six nurses, one receptionist and a practice manager.

A range of private dental services are provided.

Smileright Dental Clinic Cardiff is part of a small group of dental practices in located in England and Wales owned by Smileright LTD.

3. Summary

Overall, we found evidence that Smileright Dental Clinic Cardiff provides safe and effective care.

This is what we found the practice did well:

- Patients who completed HIW questionnaires said they were happy with the service provided
- Staff we spoke to were happy in their roles and understood their responsibilities
- Clinical facilities are well-equipped, visibly clean and tidy
- There are arrangements in place for the safe use of x-rays
- Dental instruments are cleaned and sterilised appropriately.

This is what we recommend the practice could improve:

- Arrangements for recording and responding to complaints
- Arrangements for the safe use and accessibility of emergency drugs and equipment
- Security of clinical waste stored outside the practice
- Policies and procedures which adequately reflect the regulations, standards and guidelines applicable in Wales.

4. Findings

Quality of the Patient Experience

We found that the practice is committed to providing a positive experience for their patients. The feedback gained through our patient questionnaire was very positive. The practice had a system for regularly seeking patient feedback as a way of assessing the quality of the service provided. We recommended improvements were made to the arrangements for patient complaints.

Prior to the inspection, we invited the practice to distribute HIW questionnaires to patients to obtain views on the dental services provided. Thirty one questionnaires were completed and returned to us. Patient comments included:

“Very friendly and informative staff – put me at ease throughout.”

“Treatment explained in detail and staff were friendly.”

“Very friendly staff, always take the time to talk through any services or procedures required in plenty of detail before they start.”

Dignified care

We saw evidence that patients were provided with care in a dignified and respectful manner. We found there was space for staff to have conversations with patients in a private area, away from other patients if required. We heard staff speaking to patients in a friendly and professional way. Feedback from the patients who completed our questionnaires was very positive. All patients told us that they were satisfied with the care and treatment they received at the practice.

Timely care

The practice tries to ensure that dental care is provided in a timely way. The majority of patients told us they did not experience delay in being seen by the dentists.

However, the majority of patients told us they did not know how to access out of hours dental care. We saw that emergency contact details, for patients to access emergency dental care when the practice is closed, were not displayed. We also saw that the opening hours for the practice were not visibly displayed.

We discussed this on the day of inspection and staff confirmed this would be addressed.

Improvement needed

Patients should be provided with clear information about how to access out of hours and emergency dental care.

Information about the practice's opening hours should be displayed.

Individual care

All patients who completed the questionnaires told us they received enough information about their treatment.

We saw evidence that the practice had a way of seeking patient feedback. Patient questionnaires were given out at reception and the results were passed to Smileright head office. Staff told us that these were reviewed every three months and any patterns or emerging themes were assessed and discussed with staff. We were also told that the practice had plans to use an electronic patient questionnaire system where patients could complete feedback on a tablet device. This would allow questionnaire results to be reviewed more regularly by head office.

We noticed that there were information leaflets in the waiting area with estimated costs for appointments a small number of treatments. However, a detailed price list was not displayed.

Improvement needed

A price list should be displayed so that patients are fully informed of the costs associated with their dental treatment.

The practice had a procedure in place so that private patients could raise concerns (complaints). We saw that the complaints poster was displayed behind the reception desk, but was difficult for patients to read due to its location and small print size. We saw that the complaints policy included timescales for responding to complaints which did not comply with The Private Dentistry Wales 2008 Regulations¹. We also noticed that the organisations

¹ The Private Dentistry (Wales) Regulations 2008 and The Private Dentistry (Wales) (Amendment) Regulations 2011.

referenced on the policy needed to be corrected as this included the Care Quality Commission (applicable only to patients in England) rather than HIW for patients in Wales. We also saw that the Parliamentary Ombudsman was referenced which is only applicable for patients receiving NHS treatment in England.

Improvement needed

The following improvements should be made to the complaints policy and poster:

- ***The complaints poster should be easily visible to patients (patients should not have to ask for this information)***
- ***Timescales on the complaints policy must be updated to comply with the Private Dentistry Regulations***
- ***Organisations for patients to contact about complaints must be relevant for private patients in Wales.***

We saw that the practice had a system for recording complaints. However, we noticed that the practice's procedures for recording complaints had not been followed for recent complaints received, meaning that it was difficult to determine if there were common themes emerging. We also noticed that one complaint had been responded to inappropriately by email. Responding to complaints by unencrypted email means that information relating to a patient may not be sufficiently protected. We discussed this with staff on the day of inspection and highlighted the importance of this.

Improvement needed

The practice must ensure that the complaints policy and procedures are followed for all complaints.

The practice must ensure that information relating to patients is protected at all times, including in any complaint correspondence.

Delivery of Safe and Effective Care

Overall, we found evidence that patients are provided with safe and effective dental care. We were satisfied with the arrangements in place to protect patients and staff from preventable healthcare associated infections. We were also satisfied that x-ray equipment was used appropriately and safely.

We looked at a sample of patient records and found these were appropriate. We made recommendations for the practice to improve the arrangements around emergency drugs and equipment.

Safe care

Clinical facilities

We found the practice had taken steps to help ensure the health, safety and welfare of staff and patients. We found that all surgeries were clean, tidy and well organised.

We saw that the testing of portable appliances (PAT) had been undertaken to help ensure the safe use of small electrical appliances within the practice. The practice was visibly well maintained. We saw that two fire extinguishers had been moved from their designated location and we advised the practice to address this.

Contract documentation was in place for the disposal of non hazardous and hazardous waste. However, we noticed that the clinical waste container outside was not locked. Staff explained that while they locked the container themselves, there appeared to be some unauthorised use of this container by another business.

Improvement needed

The practice should ensure that clinical waste is stored securely.

Infection control

We were satisfied with the arrangements to protect staff and patients from preventable healthcare associated infections at this dental practice. This is because we saw evidence that there were infection prevention and control

measures in place based on the Welsh Health Technical Memorandum 01-05² (WHTM 01-05) guidelines. Examples included the following:

- A dedicated room for the cleaning and sterilisation of dental instruments
- Availability and use of personal protective equipment (PPE) such as disposable gloves, aprons and eye protection
- Dedicated hand washing sink
- The equipment used for the cleaning and sterilisation of instruments was visibly in good condition
- Logbooks for checking sterilisation equipment had been maintained, including daily testing. Records for each sterilisation cycle were kept electronically and backed-up
- Instruments were stored appropriately and dated.

We saw evidence that a recent infection control audit had been completed. The practice should also consider using the Wales specific WHTM 01-05 infection control audit developed by the dental postgraduate section of the Wales Deanery.

Emergency drugs and resuscitation equipment

Resuscitation equipment and emergency drugs were available at the practice and we saw these were safe for use in the event of a patient emergency (collapse). However, we found that the practice did not have a defibrillator machine. We were told that staff would use a nearby machine located within Boots. We were given assurance that a defibrillator had been ordered on the day of inspection for use at the practice.

We saw records to show that staff had received training on how to deal with medical emergencies and how to perform cardiopulmonary resuscitation (CPR). The practice had annual training in place to help ensure that all staff had up-to-date CPR training. We noticed that one of the dentists, who had recently

² <http://www.wales.nhs.uk/sites3/docopen.cfm?orgid=254&id=232444>

started, was yet to complete this training, but we were assured this would be addressed without delay.

While we found that all emergency drugs and resuscitation equipment were in date, we found that the following improvements were needed:

- Weekly checks on emergency drugs and equipment were not performed
- Checks performed on emergency drugs and equipment were not always consistently recorded
- Consideration should be given to the location of the emergency drugs to ensure both their accessibility and security
- Clearer organisation of emergency drugs and equipment was needed to ensure that staff could easily locate the correct equipment and drugs in an emergency. We advised the practice to place the relevant emergency procedure flowcharts together with each drug to ensure they were readily available
- No signs were displayed to indicate the location of the first aid and emergency equipment. We advised the practice to address this
- First aid materials, specifically plasters, needed to be replenished and checked regularly.

Improvement needed

Further to the areas highlighted above, there must be robust arrangements in place to ensure that emergency drugs and equipment are safe for use and easily accessible at all times, whilst maintaining the security of these drugs.

Safeguarding

We found the practice had taken steps to promote and protect the welfare and safety of children and adults who become vulnerable or at risk. There were safeguarding policies for the protection of children and vulnerable adults. All clinical staff had completed training in the protection of children and vulnerable adults.

We were told there were arrangements in place for staff to raise any concerns. The practice told us that pre-employment checks of any new members of staff are carried out before they join the practice, including Disclosure and Barring Service (DBS) clearance.

Radiographic equipment

We saw documentation to show that x-ray machines had been regularly serviced to help ensure they were safe for use. We were found that the dentists involved in taking radiographs had completed the required training. This is in accordance with the requirements of the General Dental Council³ and Ionising Radiation (Medical Exposure) Regulations (IR(ME)R) 2000. Because there was a new dentist about to start work at the practice, we reminded the management/training director to ensure that any new dentists had received appropriate training in IR(ME)R before taking x-rays.

Patient records

We looked in detail at a sample of ten patient records at the practice. Overall, we found that the records were appropriate and sufficiently detailed with information about each patient's treatment.

We found evidence that patients were provided with sufficient information about their treatment in order that they could make an informed decision about their care. We saw the practice had informed consent forms for each type of treatment, but we noticed that this did not include scale and polish treatments. We advised the practice to include this.

The practice had a system for checking medical histories of patients, but we found this is not always checked each time a patient is treated in accordance with the General Dental Council Standards.

Improvement needed

The practice must have a robust system of checking patient's medical histories each time they are treated.

Effective care

Patients benefit from a practice that seeks to continuously improve the service provided. We were told that the practice engages in some relevant audits, including infection control, record keeping and radiographic audits. We were told that the dentists had access to a clinical director to provide any clinical support as required and to conduct regular appraisals. We were also told that the dentists are involved in peer review audits, including clinical records.

³ General Dental Council - <http://www.gdc-uk.org/Pages/default.aspx>

Quality of Management and Leadership

We found evidence of effective management and leadership at this practice. The day to day management of the practice is the responsibility of the practice manager who was new in post and was being supported by the management/training director. We saw a staff team at work who seemed happy and competent in carrying out their roles. We saw there was a range of policies and procedures in place, but we recommended these to be appropriately tailored and applicable for Wales.

Smileright Dental Clinic Cardiff is part of a small group of practices, with the other practices located in England. The practice is supported by a management team, including a clinical director and management/training director amongst others. The day to day management of the practice is the responsibility of the practice manager who was new in post and was being supported by the management/training director.

We saw a staff team at work who seemed happy and competent in carrying out their roles. We found there were systems in place to ensure any new staff received an induction and that they are made aware of policies and procedures.

Staff told us they were able to access training relevant to their role and for their continuing professional development (CPD). We were told that staff received annual appraisals and appraisals for the dentists were conducted by the clinical director.

We confirmed that all relevant staff were registered with the General Dental Council. In accordance with the private dentistry regulations, all dentists providing private treatment were registered with HIW and their registration certificates were available within the practice. As Smileright Dental Clinic Cardiff is solely private, we advised the practice to ensure that all dental professionals were reminded of their legal responsibilities under the private dentistry regulations.

We looked at the policies and procedures in place and found there were arrangements for regular review. The practice's policies are available to staff online via an internal intranet and are updated centrally by the management team. We were assured that any changes to policies were communicated to staff. In reviewing the policies, we noticed that they included references to regulations, standards and organisations applicable in England and needed to be updated to apply in Wales. We also noticed that the policies referenced a 'registered manager' relating to practices registered in England, but is not

applicable to practices in Wales. We advised the practice to ensure these references included a named person to avoid any confusion.

Improvement needed

All policies and procedures must be appropriate and applicable for Wales, including ensuring that Welsh specific regulations, standards and guidelines are adequately reflected.

We saw that formal staff meetings were held every couple of months. We saw an agenda for these meetings which showed a range of topics were discussed. The practice nurses also had informal team meetings on a regular basis, but these were not recorded. We advised the practice to record informal meetings, so that discussions could be reviewed at a later date and shared with any absent members of staff.

5. Next Steps

This inspection has resulted in the need for the dental practice to complete an improvement plan (Appendix A) to address the key findings from the inspection.

The improvement plan should clearly state when and how the findings identified at Smileright Dental Clinic Cardiff will be addressed, including timescales.

The action(s) taken by the practice in response to the issues identified within the improvement plan need to be specific, measureable, achievable, realistic and timed. Overall, the plan should be detailed enough to provide HIW with sufficient assurance concerning the matters therein.

Where actions within the practice improvement plan remain outstanding and/or in progress, the practice should provide HIW with updates to confirm when these have been addressed.

The improvement plan, once agreed, will be published on HIW's website and will be evaluated as part of the ongoing dental inspection process.

6. Methodology

Any dentist working at the practice who is registered with HIW to provide private dentistry is subject to the provisions of the Private Dentistry (Wales) Regulations 2008⁴ and the Private Dentistry (Wales) (Amendment) Regulations 2011⁵. Where appropriate we consider how the practice meets these regulations, as well as the Ionising Radiation Regulations 1999, the Ionising Radiation (Medical Exposure) Regulations 2000 and any other relevant professional standards and guidance such as the GDC Standards for the Dental Team.

During the inspection we reviewed documentation and information from a number of sources including:

- Information held by HIW
- Interviews of staff including dentists and administrative staff
- Conversations with nursing staff
- Examination of a sample of patient dental records
- Examination of practice policies and procedures
- Examination of equipment and premises
- Information within the practice information leaflet and website (where applicable)
- HIW patient questionnaires.

At the end of each inspection, we provide an overview of our main findings to representatives of the dental practice to ensure that they receive appropriate feedback.

Any urgent concerns that may arise from dental inspections are notified to the dental practice and to the health board via an immediate action letter. Any such findings will be detailed, along with any other recommendations made, within Appendix A of the inspection report.

⁴ <http://www.legislation.gov.uk/wsi/2008/1976/contents/made>

⁵ <http://www.legislation.gov.uk/wsi/2011/2686/contents/made>

Dental inspections capture a snapshot of the application of relevant regulations at the practice visited on the day of the inspection.

Appendix A

General Dental Practice: Improvement Plan

Practice: Smileright Dental Clinic Cardiff

Date of Inspection: 7 July 2016

Page Number	Improvement Needed	Regulation / Standard	Practice Action	Responsible Officer	Timescale
Quality of the Patient Experience					
6	Patients should be provided with clear information about how to access out of hours and emergency dental care. Information about the practice's opening hours should be displayed.	General Dental Council Standards 2.3.9	New Signage to be ordered detailing <ul style="list-style-type: none"> - Correct dentist - Opening times - Out of Hours number (already displayed) 	Claire Taylor – Andrew Griffiths	31 st August 2016
6	A price list should be displayed so that patients are fully informed of the costs associated with their dental treatment.	General Dental Council Standards 2.4.1	Price lists have been printed and displayed	Andrew Griffiths	Actioned
7	The following improvements should be made to the complaints policy and	Private Dentistry	Complaints Policy amended and displayed. Correct time scales	Claire Taylor – Dr Mostafa	Actioned

Page Number	Improvement Needed	Regulation / Standard	Practice Action	Responsible Officer	Timescale
	<p>poster:</p> <p>The complaints poster should be easily visible to patients (patients should not have to ask for this information)</p> <p>Timescales on the complaints policy must be updated to comply with the Private Dentistry Regulations</p> <p>Organisations for patients to contact about complaints must be relevant for private patients in Wales.</p>	<p>Wales Regulations paragraphs 15 and 16</p> <p>General Dental Council Standards</p> <p>5.1.5</p>	<p>detailed along with external organisations for patient to contact.</p>	Hassaan	
7	<p>The practice must ensure that the complaints policy and procedures are followed for all complaints.</p> <p>The practice must ensure that information relating to patients is protected at all times, including in any complaint correspondence.</p>	<p>General Dental Council Standards</p> <p>5.1.1, 4.5</p>	<p>All complaints to be sent to Claire Taylor</p> <ul style="list-style-type: none"> - Complaints register and event register to be completed correctly in line with practice policies - Additional training to be given to relevant personnel 	Claire Taylor	<p>Actioned</p> <p>Training to be delivered by 31st August</p>
Delivery of Safe and Effective Care					
8	<p>The practice should ensure that clinical waste is stored securely.</p>	<p>General Dental Council Standards</p>	<p>Bins will be checked daily and double locked. Advised 3rd party that this is practice use only</p>	<p>Claire Taylor- Jordan Smith (Decon Lead)</p>	<p>Actioned</p>

Page Number	Improvement Needed	Regulation / Standard	Practice Action	Responsible Officer	Timescale
		1.5.1 WHTM 07-01 section 5.32			
10	Further to the areas highlighted above, there must be robust arrangements in place to ensure that emergency drugs and equipment are safe for use and easily accessible at all times, whilst maintaining the security of these drugs.	Resuscitation Council (UK) Primary Dental Care General Dental Council Standards 1.5.3	Weekly checks are now performed and recorded on all drugs and equipment, including the oxygen and first aid materials. Drugs, equipment and Emergency drugs algorithm to be stored in Zip lock bags for each medical emergency. Drugs moved to lower cupboard and labelled accordingly	Andrew Griffiths-Jordan Smith	Actioned
11	The practice must have a robust system of checking patient's medical histories each time they are treated.	General Dental Council Standards 4	To be checked at every appointment – Information conveyed to practitioners. Quarterly audits to be carried out	Claire Taylor Dr Mostafa Hassaan	Actioned
Quality of Management and Leadership					
13	All policies and procedures must be appropriate and applicable for Wales, including ensuring that Welsh specific regulations, standards and guidelines	Private Dentistry Wales Regulations	All policies to be amended and replace existing in the files and in practice	Claire Taylor Dr Mostafa Hassan	Actioned

Page Number	Improvement Needed	Regulation / Standard	Practice Action	Responsible Officer	Timescale
	are adequately reflected.	paragraph 14 General Dental Council Standards 6.6 WHTM 01-05			

Practice Representative:

Name (print): Claire Taylor

Title: Director of Practice Management & Training

Date: 2nd August 2016