

# Inspection Report

25 May 2023



## Clear Dental Fountain Hill

Type of service: Independent Hospital (IH) – Dental Treatment

Address: 1 Fountain Hill, Antrim, BT41 1LZ

Telephone number: 028 9448 5949

[www.rqia.org.uk](http://www.rqia.org.uk)

---

Assurance, Challenge and Improvement in Health and Social Care

Information on legislation and standards underpinning inspections can be found on our website <https://www.rqia.org.uk/>, [The Independent Health Care Regulations \(Northern Ireland\) 2005](#) and the [Minimum Standards for Dental Care and Treatment \(March 2011\)](#)

## 1.0 Service information

<b>Organisation/Registered Provider:</b> Clear Dental Care (NI) Limited	<b>Registered Manager:</b> Mrs Carmel Hargan
<b>Responsible Individual:</b> Mr Mark Tosh	<b>Date registered:</b> 20 March 2023
<b>Person in charge at the time of inspection:</b> Mrs Carmel Hargan	<b>Number of registered places:</b> Three increasing to four following this inspection
<b>Categories of care:</b> Independent Hospital (IH) – Dental Treatment	
<b>Brief description of how the service operates:</b> <p>Castle Way Dental Practice is registered with the Regulation and Quality Improvement Authority (RQIA) as an independent hospital (IH) with a dental treatment category of care. The practice has three registered dental surgeries and provides general dental services, private and health service treatment and does not offer conscious sedation.</p> <p>Clear Dental Care NI Ltd is the registered provider for 24 dental practices registered with RQIA. Mr Mark Tosh is the responsible individual for Clear Dental Care NI Ltd. In addition, Mr Tosh is the responsible individual for Clear Dental Knock and Exquisite Dental operated under Clear Dental Care (Experia) Ltd and Clear Dental Lurgan operated under Clear Dental Care (Lurgan) Ltd.</p> <p>A variation to registration application was submitted to RQIA to relocate Castle Way Dental Practice to new purpose built premises; to increase the number of dental chairs from three to four; and to change the name of the practice to Clear Dental Fountain Hill.</p>	

## 2.0 Inspection summary

This was an announced primary and variation to registration inspection, undertaken by a care inspector on 25 May 2023 from 10.00am to 1.00pm.

It focused on the themes for the 2023/24 inspection year and assessed progress with any areas for improvement identified since the last care inspection. The inspection also sought to review the readiness of the practice for the provision of private dental care and treatment associated with the variation to registration application to relocate the premises and add two additional chairs.

An RQIA estates support officer reviewed the variation to registration application in regards to matters relating to the premises.

There was evidence of good practice in relation to the recruitment and selection of staff; infection prevention and control; decontamination of reusable dental instruments; adherence to best practice guidance in relation to COVID-19; radiology and radiation safety; management of complaints and incidents; and governance arrangements.

No immediate concerns were identified regarding the delivery of front line patient care.

The variation to registration application was approved from a care and estates perspective following this inspection.

### **3.0 How we inspect**

RQIA is required to inspect registered services in accordance with legislation. To do this, we gather and review the information we hold about the service, examine a variety of relevant records, meet and talk with staff and management and observe practices on the day of the inspection.

The information obtained is then considered before a determination is made on whether the practice is operating in accordance with the relevant legislation and minimum standards.

Before the inspection a range of information relevant to the registration application was reviewed. This included the following records:

- the variation to registration application
- the proposed statement of purpose
- the proposed patient guide

During the inspection we undertook a tour of the premises and met with Mrs Hargan and the operations lead for Clear Dental Care (NI) Ltd, both of whom facilitated this inspection.

Examples of good practice are acknowledged and any areas for improvement are discussed with the person in charge and detailed in the quality improvement plan (QIP).

### **4.0 What people told us about the care and treatment?**

We issued posters to the registered provider prior to the inspection inviting patients and members of the dental team to complete an electronic questionnaire.

No completed staff or patient questionnaires were received prior to the inspection.

## **5.0 The inspection**

### **5.1 What action has been taken to meet any areas for improvement identified at or since last inspection?**

The last inspection to the establishment was undertaken on 20 October 2021; no areas for improvement were identified.

## **5.2 Inspection findings**

### **5.2.1 Do recruitment and selection procedures comply with all relevant legislation?**

There were recruitment and selection policies and procedures in place that adhered to legislation and best practice guidance.

During discussion with Mrs Hagan and the operations lead it was confirmed that since the previous inspection Clear Dental Care (NI) Ltd have recruited new staff and continue to actively recruit for dentists and dental nursing staff.

Mrs Hagan and the operations lead stated that there are sufficient numbers of staff in various roles to fulfil the current needs of the practice and patients.

Dental practices are required to maintain a staff register. A review of the staff register evidenced that three new staff members had been recruited since the previous inspection. A review of the personnel files of the three newly recruited staff member evidenced that, in the main, relevant recruitment records had been sought; reviewed and stored as required. It was identified that two written references were not in place for one staff member and another staff member had only one written reference in place. This was discussed and Mrs Hagan and the operations lead were reminded for the need to have two written references in place for any new staff member prior to commencement of employment. The operations lead outlined the challenges incurred when management attempt to obtain written references and the significant delay this can cause in the recruitment process. Further advice was provided to the operations lead and Mrs Hagan in this regard who provided assurance that this area would be followed up. On 15 June 2023 RQIA received confirmation that this matter had been addressed.

A review of records evidenced that arrangements are in place for monitoring the General Dental Council (GDC) registration status of all clinical staff and records have been retained. The professional indemnity of all staff who require individual indemnity cover is checked and monitored with records retained.

As a result of the action taken following inspection it was determined that the recruitment of the dental team complies with the legislation and best practice guidance to ensure suitably skilled and qualified staff work in the practice.

### 5.2.2 Is the dental team appropriately trained to fulfil the duties of their role?

The dental team takes part in ongoing training to update their knowledge and skills, relevant to their role.

Policies and procedures are in place that outline mandatory training to be undertaken, in line with any professional requirements, and the [training guidance](#) provided by RQIA.

Induction programmes relevant to roles and responsibilities had been completed when new staff joined the practice.

The dental team takes part in ongoing training to update their knowledge and skills, relevant to their role. Policies and procedures are in place that outlines training to be undertaken, in line with any professional requirements, and the [training guidance](#) provided by RQIA. A record is kept of all training (including induction) and professional development activities undertaken by staff, which is overseen by the Clear Dental Care (NI) Ltd senior management team on behalf of Mr Tosh, to ensure that the dental team are suitably skilled and qualified. A staff training matrix was in place and shared with the inspector.

The care and treatment of patients is being provided by a dental team that is appropriately trained to carry out their duties.

### 5.2.3 Is the practice fully equipped and is the dental team trained to manage medical emergencies?

The British National Formulary (BNF) and the Resuscitation Council (UK) specify the emergency medicines and medical emergency equipment that must be available to safely and effectively manage a medical emergency. Systems were in place to ensure that emergency medicines and equipment are immediately available as specified and do not exceed their expiry dates.

There was a medical emergency policy and procedure in place and a review of this evidenced that it reflected legislation and best practice guidance. Protocols were available to guide the dental team on how to manage recognised medical emergencies.

Managing medical emergencies is included in the induction programme and refresher training is undertaken annually.

Members of the dental team were able to describe the actions they would take, in the event of a medical emergency, and were familiar with the location of medical emergency medicines and equipment.

Sufficient emergency medicines and equipment were in place and the dental team is trained to manage a medical emergency as specified in the legislation, professional standards and guidelines.

#### **5.2.4 Does the dental team provide dental care and treatment using conscious sedation in line with the legislation and guidance?**

Conscious sedation helps reduce anxiety, discomfort, and pain during certain procedures. This is accomplished with medications or medical gases to relax the patient.

Mrs Hargan confirmed that conscious sedation is not offered in Clear Dental Fountain Hill.

#### **5.2.5 Does the dental team adhere to infection prevention and control (IPC) best practice guidance?**

The IPC arrangements were reviewed throughout the practice to evidence that the risk of infection transmission to patients, visitors and staff was minimised.

There was an overarching IPC policy and associated procedures in place. Review of these documents demonstrated that they reflected legislation and best practice guidance. Mrs Hargan confirmed there was a nominated lead dental nurse who had responsibility for IPC and decontamination in the practice. The lead dental nurse had undertaken IPC and decontamination training in line with their continuing professional development and had retained the necessary training certificates as evidence.

During a tour of the practice, it was observed that clinical and decontamination areas were clean, tidy and uncluttered. All areas of the practice were equipped to meet the needs of patients.

The arrangements for personal protective equipment (PPE) were reviewed and it was noted that appropriate PPE was readily available for the dental team in accordance with the treatments provided.

Using the Infection Prevention Society (IPS) audit tool, IPC audits are routinely undertaken by members of the dental team to self-assess compliance with best practice guidance. The purpose of these audits is to assess compliance with key elements of IPC, relevant to dentistry, including the arrangements for environmental cleaning; the use of PPE; hand hygiene practice; and waste and sharps management. This audit also includes the decontamination of reusable dental instruments which is discussed further in the following section of this report. A review of these audits evidenced that they were completed on a six monthly basis and, where applicable, an action plan was generated to address any improvements required.

Hepatitis B vaccination is recommended for clinical members of the dental team as it protects them if exposed to this virus. A system was in place to ensure that relevant members of the dental team have received this vaccination. A review of a sample of staff personnel files confirmed that vaccination history is checked during the recruitment process and vaccination records are retained in personnel files.

Discussion with members of the dental team confirmed that they had received IPC training relevant to their roles and responsibilities and they demonstrated good knowledge and understanding of these procedures. Review of training records evidenced that the dental team had completed relevant IPC training and had received regular updates.



Review of IPC arrangements evidenced that the dental team adheres to best practice guidance to minimise the risk of infection transmission to patients, visitors and staff.

#### **5.2.6 Does the dental team meet current best practice guidance for the decontamination of reusable dental instruments?**

Robust procedures and a dedicated decontamination room must be in place to minimise the risk of infection transmission to patients, visitors and staff in line with [Health Technical Memorandum 01-05: Decontamination in primary care dental practices, \(HTM 01-05\)](#), published by the Department of Health (DoH).

There was a range of policies and procedures in place for the decontamination of reusable dental instruments that were comprehensive and reflected legislation, minimum standards and best practice guidance.

There was a designated decontamination room separate from patient treatment areas and dedicated to the decontamination process. The design and layout of this room complied with best practice guidance and the equipment was sufficient to meet the requirements of the practice. Records evidencing that the equipment for cleaning and sterilising instruments was inspected, validated, maintained and used in line with the manufacturers' guidance were reviewed. Review of equipment logbooks demonstrated that all required tests to check the efficiency of the machines had been undertaken.

Discussion with members of the dental team confirmed that they had received training on the decontamination of reusable dental instruments in keeping with their role and responsibilities. They demonstrated good knowledge and understanding of the decontamination process and were able to describe the equipment treated as single use and the equipment suitable for decontamination.

Decontamination arrangements demonstrated that the dental team are adhering to current best practice guidance on the decontamination of dental instruments.

#### **5.2.7 Are arrangements in place to minimise the risk of COVID-19 transmission?**

There were COVID-19 policies and procedures in place which were in keeping with the Health and Social Care Public Health Agency guidance [Infection Prevention and Control Measures for Respiratory illnesses March 2023](#) and the [Infection Prevention and Control Manual for Northern Ireland](#).

The management of operations in response to the pandemic was discussed with members of the dental team. These discussions included the application of best practice guidance, and focused on, training of staff, and enhanced cross-infection control procedures. There is an identified COVID-19 lead staff member and arrangements are in place to ensure the dental team is regularly reviewing COVID-19 advisory information, guidance and alerts.

A review of the COVID-19 arrangements evidenced that procedures are in place to ensure the staff adhere to best practice guidance to minimise the risk of COVID-19 transmission.

### **5.2.8 How does the dental team ensure that appropriate radiographs (x-rays) are taken safely?**

The arrangements regarding radiology and radiation safety were reviewed to ensure that appropriate safeguards were in place to protect patients, visitors and staff from the ionising radiation produced by taking an x-ray.

Dental practices are required to notify and register any equipment producing ionising radiation with the Health and Safety Executive (HSE) (Northern Ireland). A review of records evidenced the practice had registered with the HSE.

The practice has four surgeries each of which has an intra-oral x-ray machine and the equipment inventory reflected this. In addition, there is a cone beam computed tomography (CBCT) machine, which is located in a dedicated x-ray room.

A radiation protection advisor (RPA), medical physics expert (MPE) and radiation protection supervisor (RPS) have been appointed in line with legislation. Two dedicated radiation protection files containing the relevant local rules, employer's procedures and other additional information were retained. One file included information concerning the intra-oral x-ray machines and the second file included information concerning the CBCT x-ray unit.

A review of the files confirmed that the Employer had entitled the dental team to undertake specific roles and responsibilities associated with radiology and ensured that these staff had completed appropriate training. The RPS oversees radiation safety within the practice and regularly reviews the radiation protection files to ensure that it is or they are accurate and up to date.

The appointed RPA must undertake a critical examination and acceptance test of all new x-ray equipment; thereafter the RPA must complete a quality assurance test every three years as specified within the legislation. A review of information provided to RQIA during and post-inspection confirmed the following. A critical examination of three intra-oral x-ray machines had been undertaken on 17 April 2023 and the acceptance test for these machines was undertaken on 29 May 2023. The critical examination and acceptance test report for the fourth intra oral machine and the CBCT x-ray unit was completed on 13 June 2023. The reports generated by the RPA, dated June 2023, were provided to RQIA on 7 July 2023. A review of these reports evidenced that the x-ray equipment had been examined and any recommendation made had been or was being actively addressed.

A copy of the local rules was on display near each x-ray machine observed and appropriate staff had signed to confirm that they had read and understood these. The dental team demonstrated sound knowledge of radiology and radiation safety including the local rules and associated practice.

Quality assurance systems and processes were in place to ensure that all matters relating to x-rays reflect legislation and best practice guidance. It was evidenced that all measures are taken to optimise radiation dose exposure. This included the use of rectangular collimation, x-ray audits and digital x-ray processing.

The radiology and radiation safety arrangements evidenced that procedures are in place to ensure that appropriate x-rays are taken safely.



### 5.2.9 Are complaints and incidents being effectively managed?

The arrangements for the management of complaints and incidents were reviewed to ensure that they were being managed in keeping with legislation and best practice guidance.

The complaints policy and procedure provided clear instructions for patients and staff to follow.

Patients and/or their representatives were made aware of how to make a complaint by way of the patient's guide and information on display in the practice.

Arrangements were in place to record any complaint received in a complaints register and retain all relevant records including details of any investigation undertaken, all communication with complainants, the outcome of the complaint and the complainant's level of satisfaction. A review of records confirmed that no complaints had been received since the previous inspection.

Discussion with Mrs Hargan confirmed that an incident policy and procedure was in place which includes the reporting arrangements to RQIA. Mrs Hargan confirmed that incidents are effectively documented and investigated in line with legislation. All relevant incidents are reported to RQIA and other relevant organisations in accordance with legislation and RQIA [Statutory Notification of Incidents and Deaths](#). Arrangements are in place to audit adverse incidents to identify trends and improve service provided.

The dental team was knowledgeable on how to deal with and respond to complaints and incidents in accordance with legislation, minimum standards and the DoH guidance.

Arrangements were in place to share information with the dental team about complaints and incidents including any learning outcomes, and also compliments received.

Systems were in place to ensure that complaints and incidents were being managed effectively in accordance with legislation and best practice guidance.

### 5.2.10 How does a registered provider who is not in day to day management of the practice assure themselves of the quality of the services provided?

Where the business entity operating a dental practice is a corporate body or partnership or an individual owner who is not in day to day management of the practice, unannounced quality monitoring visits by the registered provider must be undertaken and documented every six months; as required by Regulation 26 of The Independent Health Care Regulations (Northern Ireland) 2005.

Mrs Hargan is currently the nominated individual with overall responsibility for the day to day management of the practice and is responsible for reporting to the operations lead for Clear Dental Care (NI) Ltd, who reports to Mr Tosh.

Mr Tosh (or person acting on their behalf) monitors the quality of services and undertakes a visit to the premises at least every six months in accordance with legislation. The most recent unannounced monitoring visit took place on 19 April 2023, a review of this report confirmed that the identified actions had been completed.

We were informed that Mr Tosh receives a copy of these reports by email and is therefore informed of the outcome of any unannounced monitoring visit undertaken.

### **5.3 Does the dental team have suitable arrangements in place to record equality data?**

The arrangements in relation to the equality of opportunity for patients and the importance of staff being aware of equality legislation and recognising and responding to the diverse needs of patients was discussed with staff. Staff advised that equality data collected is managed in line with best practice.

### **6.0 Quality Improvement Plan/Areas for Improvement**

This inspection resulted in no areas for improvement being identified. Findings of the inspection were discussed with Mrs Hargan and the operations lead for Clear Dental Care (NI) Ltd as part of the inspection process and can be found in the main body of the report.



The Regulation and Quality Improvement Authority

RQIA, 1<sup>st</sup> Floor  
James House  
Gasworks  
2 – 4 Cromac Avenue  
Belfast  
BT7 2JA

Tel 028 9536 1111  
Email [info@rqia.org.uk](mailto:info@rqia.org.uk)  
Web [www.rqia.org.uk](http://www.rqia.org.uk)  
 @RQIANews

Assurance, Challenge and Improvement in Health and Social Care