Guidance:

Emergency Support Framework – guidance to support answering framework questions

Primary Medical Services – Dental services

May 2020

Introduction

This guidance supports the cross-sector COVID-19 Emergency Support Framework Guidance and provides sector-specific supporting information.

REMEMBER: the main way we will gather information from providers is through the conversation we will have with them using the monitoring and engagement tool. Conversations should be supportive and, where appropriate, the inspector should signpost the provider to relevant external guidance and support. **Inspectors must not routinely ask for additional information from providers and any requests for information should always be by exception and agreed with an inspection manager.**

Planning
Check the information we already hold about services when completing the planning tool (e.g. whistleblowing information stored in CRM, inspection history). Also, consider information from external sources, such as stakeholders and healthcare professionals.

Please note: We know that in dentistry providers will have made significant changes to the services they deliver in response to the pandemic, including pausing all routine, non-urgent dental services. In line with recent national plans, face to face care will resume in line with a CDO letter to practices (**Resumption of dental services in England**) where the necessary IPC and PPE requirements are in place.

Inspectors should commence calls by asking pre-assessment questions to understand what service provision looks like, including:
- sites that are operational and/or will become operational
  the level of services they are currently providing (for example, they will not have been offering the usual full range of services) and/or will be providing

When using the Monitoring and Engagement Tool
The primary way to answer the questions in the tool is through conversation with the provider. The table below shows potential areas of discussion against the questions in the engagement tool.

There is no need to ask all the prompting questions – inspectors should use their judgement to determine which questions are relevant to the provider and what information supports them to answer the overarching question.

In some cases, we may not be able to flag providers to additional sources of support i.e. in relation to accessing PPE. Inspectors should make it clear to providers that our role here is to highlight these issues to our national partners in order to support the wider health and social care system to respond to issues at local, regional and national levels.

1. Safe care and treatment

Overarching questions (displayed in tool) and conversation prompts	Sources of support
1.1. Had risks related to infection prevention and control, including in relation to COVID-19, been assessed and managed? • *Are you managing to keep up to date with current infection prevention and control (IPC) methods?* • *What challenges have you faced?* *Please consider (where relevant):* • *Changes to IPC practice (for all locations) in line with guidance* • *Lead clinician for IPC* • *Dissemination of guidance to staff/additional training* • *IPC suitable for how they are delivering services* • *Waste management (e.g. disposal of PPE)* • *Serious Events Analysis (SEAs) relating to IPC*	[NHSE/I guidance and standard operating procedures for dental services during Covid-19](#) [Link for providers to find their local health protection team](#) [NHSE guidance on infection control in primary care](#) [Public Health England COVID-19: infection prevention and control (IPC)](#) [Public Health England Coronavirus (COVID-19): personal protective equipment (PPE) hub](#) [Public Health England guidance for health professionals to support the management of possible or confirmed cases](#) [British Dental Association: Personal Protective Equipment (PPE)](#) [General Faculty of General Dental Practice: Personal Protective Equipment](#)

1.2 Were there sufficient quantities of the right equipment to help the provider manage the impact of COVID-19?
• *Where required, are you managing to access supplies of PPE and equipment?*
  ➢ Appropriate standard?
  ➢ Sufficient amounts?
• *If no, what have you done to address this?*
• *What plans do you have for future supplies? Are you aware of any future supply issues?*
	[NHS England guidance on the supply and use of PPE](#)
	
	[Public Health England Coronavirus (COVID-19): personal protective equipment (PPE) hub](#)
	
	[Public Health England Covid-19 personal protective equipment (PPE) guidance](#)
	
	[COVID-19: personal protective equipment use for aerosol generating procedures](#)
	
	[COVID-19: personal protective equipment use for non-aerosol generating procedures](#)
	
	[General Faculty of General Dental Practice: Aerosol Generating Procedures](#)

	HSE guidance on Respiratory Protective Equipment (RPE) British Dental Association: Personal Protective Equipment (PPE) General Faculty of General Dental Practice: Personal Protective Equipment
1.3 Was the environment suitable to containing an outbreak? • *What issues have you identified within your environment in relation to managing the pandemic?* • *What changes have you made to the layout/environment to manage the situation?* *Please consider (where relevant):* ➢ *Alternative use of premises or part of premises* ➢ *How are waiting areas organised to promote safety? Ensuring COVID/non-COVID patients are not coming into contact with each other where possible*	NHSE: resumption of dental services in England Covid-19 guidance and standard operating procedure (SOP): urgent dental care systems in the context of coronavirus
1.4 Were systems clear and accessible to staff, service users and any visitors to the service? • *Where you have made changes to how you operate to manage patients with COVID-19 symptoms and non-COVID patients:* ➢ *Were health and safety risks clear to staff, patients and visitors to the service?* ➢ *How do you ensure staff and patients understand the arrangements?* ➢ *What information are patients given at the time of booking appointments? i.e. COVID-19 symptoms and how to notify the provider if any arise since booking* ➢ *How have you taken into consideration vulnerable people and those with communication requirements i.e. accessible information needs?*	NHSE: resumption of dental services in England Covid-19 guidance and standard operating procedure (SOP): urgent dental care systems in the context of coronavirus Faculty of General Dental Practice: telephone triage and assessment Faculty of General Dental Practice: routine verses urgent care

Please consider (where relevant): • *Information on website* • *Signage within premises* • *Additional communication to support onwards referral i.e. local urgent dental care system/ pharmacies/ GP etc*	
1.5 Were medicines managed effectively? (Including prescribing and management of medicines) • *Have you experienced any problems with responding to medicines alerts?* • *Have you encountered any challenges when working with your local pharmacies?* *If dispensing:* • *How have your dispensing arrangements changed?* • *Have you identified any issues in relation to dispensing and how are these being addressed?* • *Arrangements for high-risk patients, or those who are shielding?*	Advisory Council on the Misuse of Drugs (ACMD) advice on COVID-19 emergency legislation to enable supply of controlled drugs MHRA Yellow Card scheme: guidance for healthcare professionals, patients and the public NHS England: COVID-19 clinical policy for the acute use of non-steroidal anti-inflammatory drugs (NSAIDs) in people with or at risk of COVID-19 Faculty of General Dental Practice remote prescribing and advice The Framework for enhanced health in care homes v2 March 2020

1.6 Had the management of risk been affected by COVID-19?
• *Have there been any significant events/complaints related to COVID-19? If yes, how is learning from these being identified and shared?*
• *What challenges have you faced in managing emerging and existing risks?*
  ➢ *Assessment of risk in relation to services which have been paused due to the pandemic?*
  ➢ *Co-location of services and protection of staff?*
  ➢ *Risks outside of the provider's control e.g. suitability and safety of host premises?*
• *How are you meeting challenges/managing risk in relation to how you provide services?:*
  ➢ *Face to face services (including home visits)*
	NHSE: resumption of dental services in England
	
	Covid-19 guidance and standard operating procedure (SOP): urgent dental care systems in the context of coronavirus
	
	Faculty of General Dental Practice remote prescribing and advice
	
	Faculty of General Dental Practice: telephone triage and assessment
	
	Faculty of General Dental Practice: routine verses urgent care
	
	GDC high level principles for good practice in remote consultations and prescribing

➤ *Risks relating to care and nursing homes* ➤ *Remote services (including online, telephone, video)* ➤ *Management and shielding of patients*	[GDC advice for members on conducting remote consultations with patients](#) (requires member sign-in) [NHS England: Using online consultations in primary care](#)

2. **Staffing arrangements**

2.1 Were there enough suitable staff to provide safe care and treatment in a dignified and respectful way during the COVID-19 pandemic?
 • *Have there been significant changes to staffing arrangements?*
 • *If yes, what challenges has this presented?*
    ➤ *Changes to staffing structure (including staff being furloughed, made redundant or redeployed)*
    ➤ *Staff support where roles and responsibilities have changed, and new ways of working have been adopted (e.g. redeployment)*
    ➤ *Supervision/training/oversight arrangements for staff*
    ➤ *Arrangements for new staff (including induction and employment checks)*
    ➤ *Ensuring people get care and support from workers with the right knowledge and skills*
	[Disclosure and Barring Service updates to support providers during Covid-19](#)
	
	 [NHSE redeploying the clinical dental workforce to support the NHS clinical delivery plan for Covid-19](#)
	
	 [Faculty of General Dental Practice: volunteering and redeployment](#)
	
	 [Second phase of NHS response to Covid-19 – letter to Chief Execs 29 April 2020](#)

2.2. Were there realistic and workable plans for managing staffing levels if the pandemic leads to shortfalls and emergencies?
 • *How has the pandemic affected your ability to staff the service?*
    ➤ *How do you manage any redeployment of staff?*
    ➤ *What has this meant for patients who use your services?*
    ➤ *What have you needed to do to mitigate any impact on staffing levels?*
    ➤ *Where do you go to seek support?*
 	
 • *Have you been able to engage with local system arrangements? (if applicable)*
	[NHSE redeploying the clinical dental workforce to support the NHS clinical delivery plan for Covid-19](#)
	
	 [Faculty of General Dental Practice: volunteering and redeployment](#)

3.	Protection from abuse

3.1 Were people using the service being protected from abuse, neglect and discrimination? • *How have you responded to issues which may affect the equality, diversity and human rights of your patients?* ➢ *How do you ensure people with COVID-19 symptoms are not discriminated against where they have non-COVID related issues?* • *How do you ensure people continue to receive individualised assessments and are a part of the decision-making in line with relevant guidance?*	Resuscitation Council UK on ReSPECT care planning NICE guidance on decision-making and mental capacity Letter from Chief Nursing Officer and National Medical Director for England Looking after people who lack mental capacity DHSC guidance on the application of the Mental Capacity Act (MCA) and Deprivation of Liberty Safeguards (DoLS) during Covid-19
3.2 Had the provider been able to properly manage any safeguarding incidents or concerns during the pandemic? • *Do you have systems and processes in place to properly manage any safeguarding incidents or concerns during the pandemic? Have you had to make any changes to your systems in response to COVID-19?* • *Have there been any safeguarding incidents and how have you responded to these? Any themes/trends? Have you communicated with other agencies where necessary?* • *How have you tried to identify vulnerable patients during the pandemic? e.g. older isolated people, domestic abuse victims, children who are at risk etc.*	Public Health England guidance on shielding and protecting people defined on medical grounds as extremely vulnerable

4.	Assurance processes, monitoring and risk management

4.1 Had the provider been able to take action to protect the health, safety and wellbeing of staff?	Faculty of General Dental Practice: emotional help and support

• *What changes have you made to ways of working to support your staff and ensure their safety? e.g. remote working solutions/caring responsibilities* • *Do staff have appropriate equipment, technology and systems that ensure confidentiality (where they are homeworking)?* • *Do staff have access to testing for COVID-19?* • *What arrangements are in place for staff reporting COVID-19 symptoms and how is this managed?* • *Do staff have access to psychological support services where required?* • *Are you proactively assessing staff who may be at increased risk of getting COVID-19? including: Black, Asian and Minority Ethnic (BAME) colleagues, older colleagues, pregnant women, returnees, and those with underlying health conditions*	NHS practitioner health support DHSC guidance on coronavirus testing for staff HSE guidance: RIDDOR reporting of COVID-19 British Dental Association FAQS on coronavirus and the dental team

4.2 Had the provider been able to implement effective systems to monitor and react to the overall quality and safety of care?
• *What changes have you made to your service(s) in response to COVID-19 and what risk assessments have you done to ensure people are kept safe? For example: working outside usual scope of practice, pausing/reopening services, changing locations*
   ➢ *Ongoing review of risks, where necessary*
   ➢ *Has this been reflected in business continuity plans?*
   ➢ *What support and guidance are you receiving? i.e. from a support organisation or consultancy service*
 	
• *How has the pandemic impacted your ability to monitor the overall quality of care?*
• *How are you keeping up to date with relevant standards and guidance relating to the delivery of care and*
	NHSE: resumption of dental services in England
	
	Second phase of NHS response to Covid-19 – letter to Chief Execs 29 April 2020
	
	Covid-19 guidance and standard operating procedure (SOP): urgent dental care systems in the context of coronavirus
	
	Faculty of General Dental Practice remote prescribing and advice
	
	Faculty of General Dental Practice: telephone triage and assessment
	
	GDC high level principles for good practice in remote consultations and prescribing
	
	GDC advice for members on conducting remote consultations with patients (requires member sign-in)

treatment? How are these being shared with staff?
• *What changes have you made to systems to ensure access to your services, in response to COVID-19?*
    ➢ *remote access - telephone assessments, video or online consultations*
    ➢ *have communication needs i.e. deaf people/ people who do not speak English*
    ➢ *do not have access to a computer, smart phone, tablet or telephone?*
• *How are you identifying and supporting 'high risk' patients/groups with their ongoing care needs?*	

4.3 Is the provider able to support staff to raise concerns during the pandemic? • *How are you continuing to support staff to speak up and raise concerns?* • *How have you managed to promote team working, for example, team meetings?*	CQC and National Guardian joint statement: Safety and speaking up during the COVID-19 emergency Freedom to speak up during COVID-19
4.4. Had care and treatment provided to people been sufficiently recorded during the COVID-19 pandemic? • *How have you managed to promote team working, for example, team meetings?* • *Has the impact of the pandemic led to changes or issues with regard to how records are kept and shared?* • *Are you experiencing any barriers to sharing or accessing patient information with other providers?*	British Dental Association: guidance for members on record keeping during the Covid-19 pandemic (member sign-in required) Faculty of General Dental Practice: record keeping during the Covid-19 pandemic NHSE/I Letter COVID-19: Increased Patient Information for health and care professionals letter NHS X information Covid-19 information governance guidance
4.5 Had the provider been able to work effectively with system partners when care and treatment is commissioned, shared or transferred?	

• *How are you coordinating care with partners and/or stakeholders, and sharing information?*
    ➢ *Care and nursing homes, GPs, pharmacies*
    ➢ *Other providers, sub-contractors, commissioners, national bodies*	

Additional sources of support:

- CQC dental mythbusters
- https://www.gov.uk/coronavirus
- NHS Choices
- Local authority sites – find your local council
- Medicines and Healthcare products Regulatory Agency
- World Health Organisation