



British
Acupuncture
Council

Institutional Clinical Self-Audit (ICSA)

Adapted from the
BAcC Code of Safe Practice 2022



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British
Acupuncture
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Board

Submitting your Institutional Clinical Self-Audit (ICSA) to the BAAB

With your Annual Monitoring Audit Form (AMAF)

Please submit the following pages

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For Major Review and by request
Please submit the whole completed Institutional Clinical Self-Audit (ICSA)

The Code of Safe Practice (2016) is published by the British Acupuncture Council (BAC) to define standards for the safe and hygienic practice of acupuncture. Failure to comply with this Code is a breach of the British Acupuncture Council's Code of Professional Conduct.

This Institutional Clinical Self-Audit (ICSA) is adapted by the BAAB for assuring that as an accredited course provider, you are meeting all the requirements of the Code of Safe Practice and can identify any improvements which may be necessary within your clinical training provision.

Why carry out an audit?

Reflective practice is an important part of our profession and it's especially important in order to keep up to date with all areas of safe practice and the legal requirements of running an acupuncture practice. There may be changes within the areas of safe practice or licensing throughout the year which a regular audit will ensure you are aware of.

As a teaching institution, you should be aware that your students learn about compliance with safe practice by following your example. It is very easy for to become complacent and for bad habits to become established. By carrying out an annual review you are confirming your commitment to the high standards of practice which are expected of BAC members and BAAB accredited course providers.

How do you carry out an audit?

The ICSA is minimally adapted from the BAC toolkit in order to allow you to assess your teaching clinic and supervisor's practices against the 14 main requirements set out within the code of safe practice. This would be the absolute minimum we would expect from a self-audit, however you may choose to go into further detail in some areas and you should keep a note of this within this audit.

The audit tool is broken down into 4 key parts as follows:

Part A – your details and a summary of the process of the self-audit

Part B – Is a simple checklist to ensure you have all the relevant documentation within your training clinic.

Part C - Is where you record your findings and actions that need to be taken following this audit.

Part D - Requires you to assess whether you meet the criteria set out within the code of safe practice. Rather than simply requesting a "yes" or "no" we ask that you undertake a more reflective process to encourage you to look at how well you meet the requirements set out within the code. It may be that although you meet all the requirements there are areas that you would like to make improvements. These would be recorded in part C.

We positively encourage peer to peer auditing which allows for a better assessment and potentially more thorough assessment process.

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Must

Throughout this document, where the term ‘must’ is used, you are required to comply. Failure to comply with the Code is a breach of the British Acupuncture Council's Code of Professional Conduct, and in areas like registration, licensing and hazardous waste removal may also constitute a criminal offence.

Should

The term ‘should’ is used in this guidance to indicate best practice and the use of your professional judgement where, for example, there may be factors outside your control that affect how you comply with the mandatory principles.

Part A

NAME OF TEACHING INSTITUTION:

Name and location of teaching clinic if different from above:

Name(s) and location(s) of any other teaching clinics:

Please list all your Clinical supervisors, including their professional body membership, employed by your institution:

Audit co-ordinated by:
(clinic coordinator/manager/director and member of the BAAC)

Dates over which the audit was undertaken:

Date of previous audit:

Process of self-audit: Summary

Who was involved in the audit and in what roles?

How many treatment rooms were audited in the teaching clinic(s)?

What other rooms (such as classrooms) used for teaching or observing needling in practice were audited?

How many external clinics were audited?

Were any treatment rooms or areas missed and why?

How many supervisors/teachers clean field and hygienic needling technique were audited?

Were any of them not audited? Why?

Was there a process of peer review?

Details and actions of previous audit

Please give a brief summary of any recommendations and actions taken following your previous audit

Areas of improvement / recommendations	Action taken

Part B – Documentation checklist

Please confirm that you have the following documents available either within your practice or another safe location.

- Certificate of local authority registration (if applicable) Y / N
- Certificate of insurance for non BAcC members Y / N
- Additional certificates of public liability / professional indemnity Insurance (if applicable) Y / N
- Copies of contracts for disposal of sharps & clinical waste Y / N
- First Aid certificates for all clinic supervisors Y / N
- Fire risk assessment Y / N
- Risk assessment Y / N
- Records of electrical equipment assessment Y / N
- COSHH assessment (if applicable) Y / N

If you are missing any of the above please make a note in part C for further action

Additional notes / comments:

Part C – Your assessment against the principles within the Code of Safe Practice

Below you will find the details of the 14 main requirements as set out in the code of safe practice. After each main point you are required to comment on how you are

meeting these requirements. If you feel that you fall short of this requirement or there are areas of improvement then these should be recorded in Part C.

Your workplace

You must only perform acupuncture in premises suitable for professional medical work

The premises **should** be used solely for the practice of acupuncture or other similar medical work.

Briefly describe your clinical facility along with details of any other practitioners and their therapies. Has anything substantial changed within the clinic or treatment rooms or in relation to their use since the last audit?

You must ensure that your supervisors and any premises where students work are properly registered or licensed for the practice of acupuncture

Are all your supervisors registered with the local authority	Y/N
Is this clinic address registered with the local authority	Y/N
Is this clinic address exempt from local authority licensing?	Y/N
If so have you notified the local authority of your presence?	Y/N/NA

You must have suitable hand washing and sanitary facilities

You **must** ensure that there is a wash-hand basin with supply of clean hot running water located in the treatment room or in the near vicinity (ie not necessitating opening and closing of doors by hand) and solely for use by you and other practitioners.

Wash-hand basin taps **should** be wrist, arm or foot operated.

You **must** ensure the provision of antibacterial liquid soap in a suitable dispenser, disposable paper towels and an adequately sized bin which should be foot pedal operated if lidded and placed close to the basin.

Do you have a sink in your treatment rooms? If not where are your sinks located?	Y/N
Is this sink for the sole use of clinic supervisors and students? Who else uses this sink?	Y/N

You must keep the treatment room clean

You **must** ensure that tabletops, shelves and all working surfaces including couches and chairs are smooth, impervious and easily cleanable.

Flooring **must** be smooth and impervious or short pile (not looped) commercial carpeting.

(Questions relating to this aspect of the code have been included in the description of your treatment room.)

You must avoid possible cross-infection from the treatment surfaces

You **must** ensure the couch surface is clean for each patient by **one** of the following three methods:

- cleaning the couch surface before treating each new patient
- covering the couch surface with paper couch roll, fresh for each patient and disposed of immediately after the treatment
- covering the couch surface with towels or sheets alone, fresh for each patient and boiled or machine-washed on a 40-60 degrees setting before reuse.
- You **should** regularly clean all surfaces with an appropriate detergent or disinfectant, and you **must** always do so at the beginning and end of every working day.

Please describe how you prepare your treatment couches for each new patient:

Please describe what additional materials you use within your clinic for patient comfort and modesty as well as how and when they are cleaned:

Do you have an adequate supply of clean gowns, blankets, couch covers for the number of patients likely to be seen in a day? Y/N

Who is responsible for cleaning the clinic rooms?

You must only use equipment which is CE-marked and conforms to current legislation

- You **must** use, single-use, pre-sterilised disposable needles packed in a box marked with a lot number, CE mark, method of sterilisation, the word 'sterile', an expiry date and the wording 'for single use only' or 'do not reuse'.
- You **must** dispose of any needles beyond their expiry date immediately, except for 'expired' needles retained for training purposes (ie used on a needle cushion) which **must** be labelled clearly and stored in a distinctly separate area, preferably under lock and key.
- Unused needles from multipacks of five, ten or more needles **must not** be used after a patient session if there is any risk that they have been contaminated after the seal on the package has been opened.
- Open unused multipack needles **must not** be stored overnight for later use.
- Any needle(s) in an unopened package with a damaged seal **must not** be used.
- Guide tubes **must** be pre-sterilised and come packaged with each individual needle or set of needles; they **must not** be used or stored for use after the session in which the seal on the package is broken.

Please list the size, gauge and number of boxes you have for each size of needle along with their expiry dates.

Needle size

No of boxes

Expiry date

Please describe what procedures you have in place to deal with:

1. Needles which are out of date
2. Needles stored for training purposes only
3. Discovering a damaged packet of needles.

Your duty of care

You must ensure the health and safety of your patient

- You **must** take a thorough medical history of each new patient and ensure that acupuncture is an appropriate treatment for them.
- If a patient has, or is suspected of having, a notifiable infectious disease or has a serious pre-existing medical condition, you **should** ensure that it is safe to treat them, if necessary by contacting their GP.
- You **must** ensure that any part of the body to be treated is clean, free from wounds and cuts, and clear of any clothing.
- If you leave a patient unattended: you **must** first obtain their consent; you **must** advise them not to move in any way which might bend or damage a needle and cause them injury; you **must** make them aware of how to call for your immediate attention at any time.
- You **must not** leave a patient unattended when using moxa, cupping or any other form of treatment where a patient may suffer from physical injury.
- You **should** be able to recognise adverse reactions to acupuncture treatment and know what action to take, including referral to another acupuncturist or other health professional if appropriate.

Are you confident that each patient is suitably assessed to ensure they are safe to receive acupuncture?
Y/N

If patients are left unattended, please describe what procedures you have in place to allow them to draw your attention whilst you are out of the room

Have you had any adverse reactions / incidents within your clinic within the last year Y/N

If so were these reported to the BAcC through the adverse incident reporting (AIR) scheme
Y/N

If not, why not?

You must ensure that supervisor and student's own health and personal hygiene do not put the patient at risk

- You **must** cover any cuts and wounds with a waterproof dressing.
- You **must** keep your nails short and clean. You **must not** wear artificial nails or use nail polish that could compromise hand hygiene.
- You **should** dress in an appropriate and clean manner which befits the professional/medical nature of your role.
- You **should** avoid giving treatment when suffering from an infectious or contagious condition which may be transmitted to the patient.
- You **should** inform your GP as soon as possible if you suspect that you are suffering from, or have been in contact with someone suffering from, a notifiable infectious disease.
- You **should** not treat a patient if your performance may be affected by prescribed or over-the-counter medication.
- You **should** make changes to your practice or cease practising if your physical or mental health could adversely affect your performance or judgement or otherwise put patients at risk.

Briefly describe any occasion where supervisors and students have chosen not to work or where on reflection shouldn't have worked

Briefly describe how you would deal with supervisor and student's sickness and inability to work

Your responsibility to perform acupuncture safely

You must establish and maintain a clean field at all times.

- You **must** establish a clean field area on a flat, smooth, cleanable surface in the treatment room.
- All treatment equipment **must** be placed on the clean field, including trays, packets of needles, packets of sterile cotton wool and sterile alcohol swabs.
- You **must not** place on the clean field any container used for disposal of needles and/or contaminated waste.

Briefly describe how supervisors and students in your clinic establish a clean field, what cleaning materials you use and what equipment you place within the clean field.

You must maintain high levels of hand hygiene

- You **must** wash your hands thoroughly with antibacterial soap if they are visibly soiled or physically dirty.
- You **must** wash your hands with antibacterial soap before and after every treatment.
- You **must** sanitise your hands with alcohol gel before removing any needles.
- You **must** sanitise your hands with alcohol gel before touching the patient if your hands have become contaminated by handling anything which could transfer infection from patient to patient.
- You **must** wash your hands after dealing with blood and body fluids regardless of whether you wear gloves.

Briefly describe your clinic's handwashing routine, hand towel provision and when hand gel is used instead of hand washing.

You must insert and remove needles hygienically and safely

- You **must** ensure that the skin at the needle site is clean and clear of any clothing.
- You **must** clean any areas of the body where moisture or exudates may collect with an alcohol swab and allow to dry before needling.
- You **must** wash any dirty skin with soap and water before swabbing and needling.
- You **must** thoroughly clean any skin that has been previously treated with creams or oils with 70 per cent alcohol and allow to dry before needling.
- You **should** open all single-use pre-sterilised needles and instruments in the presence of the patient and immediately before use.
- You **must** use a fresh needle for every point needled during a treatment and you **must never** reinsert a needle that you have already used.
- When inserting the needle, you **must never** touch the shaft with bare fingers or with non-sterile materials.
- You **should** use only sterile material when supporting the shaft of the needle after insertion and **must** specifically do so if either increasing needle depth or if inserting the needle without a guide tube.
- You **must** not place a needle on an intermediate surface before or after use.
- You **must** ensure that you note the location and the number of needles you insert during treatment.
- You **must** place each needle used in the sharps box immediately on removal.
- If you draw blood when removing needles, you **should** apply light pressure using sterile cotton wool, avoiding contact with the patient's body fluids. You **must** dispose of the cotton wool immediately, in a sharps container or clinical waste bag.
- Once you have needled a point, you **must not** re-palpate the point with your bare finger during that treatment session unless the fingertips have been cleaned by hand washing or alcohol-based hand rub gel.

Briefly describe any differences in your needling technique to the above processes and reasoning for this.

Briefly describe how you record the number and location of the needles you have inserted

You must use well-fitting single-use disposable surgical gloves for blood or fluid spills

- If the patient is bleeding profusely.
- If blood or body fluid is spilled; and you **must** ensure that any spillage is cleaned up promptly with detergent, followed by disinfectant solution.
- If the patient has open lesions.
- If the patient has a contagious disease.
- If you have cuts or wounds on your hands which cannot be covered adequately with a waterproof dressing.
- If you have a skin infection.
- When handling any blood-soiled items, body fluids, excretions or secretions, or touching any contaminated surfaces, materials, or objects.

Have you had any reason to wear gloves? If so briefly describe the reason why.

Briefly describe the procedures you have in place for dealing with any spillages of blood or body fluids

Your safe disposal of equipment and clinical waste

You must dispose of used equipment and clinical waste legally, safely and in accordance with current legislation

- You **must** place all sharps - needles, plum blossom needles (seven star hammers) and dermal needles (press studs), etc - immediately after use into a sharps disposal bin.
- You **must** dispose of sealed sharps containers via a licensed agent.
- You **must** place all clinical waste contaminated with spillage of body fluids - blood, open-wound abrasions, mucous membranes, etc - into clinical waste bags which must be sealed and stored securely for collection by a licensed agent.
- You **must** retain all contracts and receipts for clinical waste collection for two years.
- You **should** dispose of any waste which has not come into contact with body fluids or spillages - needle wrappings, single-use guide tubes, etc - via commercial or domestic waste, provided that it is carefully bagged.
- Your sharps box **must** conform to BS EN ISO 23907:2012 requirements and be clearly marked with the words 'danger – contaminated needles – to be incinerated'.

Which company provides your clinical waste services?

Do you have alternative arrangements for your sharps disposal, if so please describe what they are?

Y/N

On what date does your clinic waste contract end or do you have an ad hoc arrangement?

Your commitment to health and safety

You must comply with the requirements and provisions of current health and safety at work legislation, especially hazardous waste and fire regulations

- You **should** be aware that your duty of care extends not only to patients and employees but also to any member of the public visiting your premises.
- You **must** ensure that your premises are safe and that all equipment and machinery on the premises is regularly inspected and maintained.
- You **must** ensure that all electrical and gas appliances are subject to regular examination and certification.
- You **must** carry out an audit in line with current fire safety regulations and legislation.
- You **should** assess your premises for disability access in line with the Equality Act.
- You **must** ensure that you have appropriate equipment and procedures in place in the event of an emergency.

Who within your clinic has overall responsibility for health and safety?

Are you aware of the risk assessments that have been carried out? Y/N
Have you carried out your own risk assessment, if so please give brief details.

Briefly describe the key findings of your fire risk assessment.

Briefly describe your procedures for dealing with an emergency such as a fire in the clinic whilst with a patient.

Please give details of what electrical equipment you have within your clinic and the frequency of inspection.

Briefly describe how you accommodate patients with a disability within your clinic and any alternative arrangements you might have in place for their treatment.

Part D - Details and actions of this audit

Please give a brief summary of any recommendations and actions required following this audit

Areas of improvement / recommendations	Action required	Date completed