



Healthcare Associated Infection (HAI): Human Resources Policy for Staff Screening During Incidents and Outbreaks

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The provisions of this policy, which was developed by a Partnership group on behalf of Grampian Area Partnership Forum, apply equally to all employees of NHS Grampian

NHS Grampian
Healthcare Associated Infection (HAI): Human Resources Policy for
Staff Screening During Incidents and Outbreaks

This document is also available in large print and other formats and languages, upon request. Please call NHS Grampian Corporate Communications on Aberdeen (01224) 551116 or (01224) 552245.

This Policy has undergone Equality and Diversity Impact Assessment.

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Contents

	Page
1. Introduction and policy statement	4
2. Background	4
3. Policy for Staff Screening In The Event of a Healthcare Infection Incident or Outbreak	4
3.1 Staff Screening requirements	4
3.2 IMT assessment for screening	5
3.3 Staff screening process	6
3.4 Staff requiring screening	6
3.5 Support for staff and confidentiality	7
3.6 Management of staff refusing to be screened	7
4. Management of Staff Testing Positive and Treatment Failure	8
4.1 Management of staff testing positive	8
4.2 Absence from work	8
4.3 Incident Management Team (IMT)	8
4.4 NHS Grampian Occupational Health Services	9
4.5 Treatment Failure	9
4.6 Deployment	9

NHS Grampian

Healthcare Associated Infection (HAI): Human Resources Policy for Staff Screening During Incidents and Outbreaks

1. Introduction and policy statement

This document sets out the requirements to be taken by NHS Grampian if staff screening is required during a healthcare associated infection incident (HAI) or outbreak of infection. The document also provides guidance on the management of staff testing positive or where treatment fails. The document does not provide detail on vaccine preventable diseases and advice on this can be found in the Immunisation Against Infectious Disease: The Green Book.

2. Background

The National Infection Prevention and Control Manual (NIPCM) provides guidance to all those involved in care provision and should be adopted for infection prevention and control practices and procedures. In regard to staff screening Chapter 3 'Healthcare Infection Incidents, Outbreaks and Data Exceedance' is designed to support the early recognition of potential infection incidents and to guide Infection Prevention and Control Teams (IPCTs)/Health Protection Teams (HPTs) in the incident management process within care settings.

The NIPCM is also aligned to the Management of Public Health Incidents: Guidance on the Roles and Responsibilities of NHS led Incident Management Teams (2017).

This guidance supersedes the previous HDL(2006) 31.

The aim of this guidance is to ensure effective staff screening during an outbreak or incident to protect patients, visitors, employees and their families including household contacts from the consequences of avoidable infections.

3. Policy for Staff Screening In The Event of a Healthcare Infection Incident or Outbreak

An early and effective response to an actual or potential healthcare associated infection (HAI) incident or outbreak is crucial. The local board Infection Prevention and Control Team (IPCT) and/or Health Protection Team (HPT) must be aware of and refer to Chapter 3 of the National Infection Prevention and Control Manual (NIPCM) and the Management of Public Health Incidents guidance when assessing the need for staff

screening. This will be the responsibility of the Incident Management Team (IMT).

3.1 Staff Screening requirements

The IMT responsible for managing an incident or outbreak of infection within a care setting may decide that staff screening is necessary as part of the control measure to manage a specific infectious agent.

NHS Grampian should work in partnership with Trade Unions/Professional Organisations to develop and agree specific pathogen policies on staff screening depending on the incident/outbreak. NHS Grampian IMT should base the decision to undertake staff screening on the following criteria:

- The principles and rationale behind the need to screen staff (or groups of staff) in specific circumstances.
- The role of the IMT during staff screening.
- Support for employees and maintaining confidentiality during the process.
- Management of an employee refusing to be screened following HR policies.
- Management of an employee staff positive and when there is treatment failure, including absence from work and financial arrangements.
- The consideration for deployment if treatment fails.
- The role of NHS Grampian Occupational Health Services.

3.2 IMT assessment for screening

The decision to screen staff is the responsibility of the IMT and should not be embarked upon lightly. The rationale for staff screening may include one or more of the following:

- To characterise the epidemiology of the incident/outbreak in terms of time, place and person.
- To identify the potential source of the incident/outbreak.
- To assist with interrupting transmission of an infectious agent during an ongoing outbreak/incident.
- To confirm eradication of an infectious agent or outbreak.

The more the above criteria are satisfied, the stronger the case is for staff screening. These are the guiding principles but, as the circumstances of each incident/outbreak will differ, the final decision is the responsibility of the IMT.

Where the IMT determine that it is necessary to screen staff, the HAI Executive Lead, Director of Human Resources, and Employee Director will

be informed as well as the Trade Unions/Professional Organisations and any other professional organisations considered by the IMT. The IMT will directly notify the Chief Executive if staff screening is required for infectious diseases of high consequence.

A cohesive approach to screening must be adopted. The inclusion of a Grampian Area Partnership Forum/staff side representative will ensure key Trade Unions/Professional Organisation representatives are involved at the earliest and all stages of the process. It is also vital that a communications strategy for employees is developed, agreed and implemented by the key stakeholders at an early stage. Communications, whilst remaining the responsibility of the IMT should be sensitive and support the needs of individual employees.

3.3 Staff screening process

Staff screening is a confidential process requiring consent and record keeping. This will be coordinated by NHS Grampian's Occupational Health Service and the employee will be provided with written details of the process. Screening involves the collection of specimens from areas of the body where the suspected or confirmed infectious agent is most likely to be found. The screening may be undertaken by occupational health, General Practitioner, other healthcare provider or the employee depending on the assessment of the IMT. For example, this could include swabs of the nose, throat, rectum, perineum, skin lesions, faecal or blood samples.

The laboratory tests used will focus specifically and exclusively on the detection of the infectious agent known or suspected to be involved in the outbreak. No other infectious agent will be tested for.

3.4 Staff requiring screening

This will be determined by the IMT based on a risk assessment. The IMT will agree a definition for all staff groups requiring screening and recommend the required screening appropriate to the infectious agent. The criteria used by the IMT to determine which employees are screened will be based on the epidemiology of the infectious agent but could be:

- All clinical employees who had patient contact based on the agreed definition.
- Non-clinical employees with minimal direct patient contact such as domestic/ancillary staff.
- All employees clinical and non-clinical who have contact with healthcare equipment or the ward environment.

Each situation will require its own detailed procedure, setting out the details of the screening process. Non-clinical employees involved may on occasion include ancillary employees such as estates, porters and administrative

staff. It is recommended that there is clear and open communication about these procedures.

The IMT may also alert other organisations where patient movement has been a factor e.g. Scottish Ambulance Service.

The IMT with the support of senior management will provide written guidance for employees, on the following:

- What infectious agent are being screened for?
- Details of the screening process, including the nature of specimens and the follow up screening of employees if identified as positive.
- Information relevant to the infectious agent involved.
- Who the target groups of employees are.
- Timeframe for carrying out screening.
- What support will be provided to employees.
- How confidentiality will be maintained.
- Management of employees refusing to be screened.
- Management of employees testing positive, including absence and financial arrangements.
- Treatment and post-treatment screening.
- Treatment failure and issues of deployment.

3.5 Support for employees and confidentiality

The IMT should ensure that employees are fully supported throughout the screening process. Employees will receive advice at the time of the screening either through NHS Grampian's Occupational Health Service, General Practitioner or other healthcare provider. In cases where by the screening is being undertaken for infectious diseases of high consequence, a counselling service will be provided.

Where practicable, one-to-one meetings should be held with individual employees, where they have the right to be accompanied by a Trade Union/Professional Organisation Representative or a current work colleague, to ensure that they are kept as up to date as possible with events around the outbreak. Where large numbers of employees are involved, this function may have to be substantially managed through open staff meetings and written briefings.

Incidents or outbreaks of infection can be particularly stressful and challenging for employees. They will have concerns about testing positive and all the challenges that will ensue from that, such as 'Is it treatable?' 'Will I still be able to work?' and 'In what capacity?'. Some may have feelings of guilt in that they may have passed on the infection. It is critical that staff are fully supported through this, and that a culture of blame and recrimination has no place in the ward, unit, hospital or board.

Maintenance of confidentiality is key to obtaining the trust and co-operation of employees and will help to reduce the development of a blame culture. The IMT, NHS Grampian's Occupational Health Service and the laboratory should develop systems and a protocol on the handling of samples, reporting of results and retaining confidentiality. Occupational health staff will also be directly responsible for informing an employee about their results, and for treatment advice to those testing positive. Employees' General Practitioners should be involved as the situation requires. It should be emphasised that any breach of confidentiality will be investigated as per HR or other relevant policies.

3.6 Management of an employee refusing to be screened

Professional codes of conduct/practice and terms and conditions of healthcare employees generally outline explicit or implicit responsibility to comply with screening exercises in the interests of patient safety. There may also be pertinent contractual and Health & Safety at Work Act issues.

Once the IMT has decided that screening employees is necessary, all targeted employees should be actively encouraged to participate. employees who are fully supported and informed, and working in a 'no blame' culture, whilst being apprehensive and concerned, should normally overcome these fears and participate in screening. However, refusal by any employee to participate in a screening process once they have been identified as requiring to do so, will be viewed seriously.

Refusal to participate in screening may constitute a breach of the employee's contract of employment and considered as a failure to comply with a reasonable instruction. It may also constitute a breach of the relevant professional code of conduct/practice.

NHS Grampian's agreed procedure in this event is as the following:

- The employee should be offered counselling and support, and through one-to-one discussions be given further opportunities to participate in the screening process.
- Persistent refusal to be screened may pose a potential risk to patients and employees. Dependent on the seriousness of the incident or outbreak it may be necessary to medically suspend the employee from work if they are experiencing health related concerns which may mean they are a risk to themselves or others following an appropriate risk assessment.
- A full review of employment options should take place as soon as possible and the employee and their representative, as appropriate, kept informed and up to date throughout the review.

4. Management of Staff Testing Positive and Treatment Failure

4.1 Management of staff testing positive

NHS Grampian is committed to ensuring that staff testing positive following screening are treated in a consistent, fair and supportive approach by all managers.

NHS Grampian's Occupational Health Service, under advice from the IMT, will be responsible for establishing that an employee has tested positive for a particular infectious agent and for commencing appropriate treatment. Depending on the circumstances, this may be done in consultation with the employee's General Practitioner or local pharmacy. The NHS Grampian's Occupational Health Service is responsible for informing staff of the results of the screening process.

Further information is detailed within NHS Grampian's Major Infectious Diseases Plan.

4.2 Absence from work

As soon as it is established that an employee is infected/colonised with the identified infectious agent they may be sent home (if appropriate) by NHS Grampian's Occupational Health Service (with authority of the IMT) who will advise and liaise with the appropriate manager. Medical exclusion from work due to an infectious disease is determined by guidance from the Health Protection Unit based on the Exclusion Policy for Infectious Diseases.

While the employee is experiencing symptoms this should be recorded as sickness absence. Where the control of infection advice requires the employee to remain off work for a period after symptoms subside, this period will be regarded as medical exclusion. The employee will be entitled to payment as if at work during this period. Medical exclusion will not count towards sickness absence triggers. The Manager must record for payroll purposes that the absence is a medical exclusion/control of infection leave. Alternatives to medical exclusion should always be considered e.g. working at home.

In epidemic or pandemic situations special coding may be advised to the manager (e.g. additional disease code under Special Leave).

4.3 Incident Management Team (IMT)

The IMT is responsible for overseeing the treatment programme for employees by occupational health and will keep managers advised of progress. NHS Grampian's Occupational Health Service will normally be a member of the IMT where staff screening is involved. The IMT in

conjunction with relevant health care practitioners will advise on criteria for determining when employees are fit to return to work.

Further information is detailed within NHS Grampian's Major Infectious Diseases Plan.

4.4 NHS Grampian's Occupational Health Service

The role of NHS Grampian's Occupational Health Service includes the following:

- Implementation and co-ordination of the screening programme in consultation with the IMT with support from senior management.
- Employee support including pre-screen discussion and provision of counselling for diseases of high consequence.
- Development and application of the consent form.
- Management of personal data.
- Receipt of results and informing employee.
- Ensuring application of Medical Exclusion as appropriate to remove those testing positive from the work environment, under advice from the IMT, and informing the appropriate Manager.
- Arranging treatment in consultation with the IMT and the employee's General Practitioner/treating practitioner.
- Arranging specialist referrals if appropriate.
- On the advice of the IMT, informing the appropriate manager of when the employee is able to return to work.

4.5 Treatment Failure

If following appropriate treatment and risk assessment the IMT and NHS Grampian's Occupational Health Service conclude that an employee is unable to return to their post during the identified HAI Incident and/or Outbreak, a meeting should be convened with the employee, their Trade Union/Professional Organisation representative or a current work colleague, an HR representative and an appropriate representative from the IMT. The purpose of this meeting should be to explain and discuss the nature of the infection and the reasons why the employee is not able to return to their post during the identified HAI Incident and/or Outbreak, and to discuss temporary deployment options.

4.6 Temporary Deployment Options

In circumstances where an employee is unable to return to their post during the identified HAI Incident and/or Outbreak, all reasonable steps should be

considered within NHS Grampian for temporary deployment options. This may include working from home if appropriate.