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**EMPLOYMENT POLICIES AND
PROCEDURES**

**HEALTHCARE ASSOCIATED INFECTION:
POLICY FOR STAFF SCREENING
DURING INCIDENTS AND OUTBREAKS**

**FOR APPROVAL BY LOTHIAN PARTNERSHIP FORUM
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NHS Lothian
HEALTHCARE ASSOCIATED INFECTION:
POLICY FOR STAFF SCREENING DURING INCIDENTS AND OUTBREAKS

1. Purpose

To provide guidance on NHS Lothian systems for deciding upon, and implementation of, staff screening as an aid to the management of a Healthcare Associated Infection (HAI) incident or outbreak.

2. Principles

The underpinning principle of the policy is to protect patients, visitors, staff and their families and the wider community from the consequences of potentially hazardous infections.

The overall framework for this policy has been set by the circular NHS HDL (2006) 31, *Healthcare Associated Infection (HAI): Human Resources Policy for Staff Screening During Incidents and Outbreaks*.

It should also be noted that the General Medical Council (GMC) identifies a professional responsibility to comply with staff screening. The Nursing and Midwifery Council (NMC) has stated that participation in screening programmes is implicit in the NMC Code of Practice. The Health Professions Council also has standards of conduct regarding conduct, performance and ethics, always acting in the best interests of patients, clients and users.

It is fundamental to this policy that staff confidentiality will be maintained at all times.

3. Scope

This policy applies in all situations where screening is deemed relevant to the management of an incident or outbreak by the Incident Management Team (IMT). This includes screening of NHS Lothian staff and any others working within NHS Lothian premises.

It in no way affects to the rights of staff who self refer or are referred by management to Occupational Health to discuss HAI.

4. What is Staff Screening?

Staff screening is a confidential process, which will be undertaken by Occupational Health. It will involve collection of specimens from areas of the body where the particular type of organism(s) being looked for are most likely to be found. For example, this could include swabs of the nose, throat, perineum, skin lesions, and faecal or blood samples.

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

Staff screening is a confidential process which ensures that only Occupational Health and the individual member of staff will have access to the results of their test (subject to special circumstances outlined in Section 11 below).

5. The Decision to Screen

Screening and testing of staff in NHS Lothian in relation to incident or outbreak management can only take place where an Incident Management Team (IMT) has been established.

NHS Lothian recognises that staff screening should not be embarked upon lightly, and will only be authorised by an IMT which includes Occupational Health, ER and Partnership representation. In reaching its decision the IMT must consider relevant Scottish Government Health Department and UK national guidance and confirm that the screening is required as a significant input into the identification and or management of the incident/outbreak. Screening will only take place for a named specific organism(s) relevant to the incident/outbreak in question.

The rationale for embarking on a staff screening programme may include one or more of the following:

- To characterise the epidemiology of the incident or outbreak in terms of time, place and person;
- To identify the likely source and index case, with a view to control;
- To assist with interrupting the chain of transmission of an incident or outbreak;
- To confirm eradication of an outbreak.

6. Staff to be Screened

Screening must only be carried out on those individuals identified by the IMT as the group where screening is justified. It may be that more than one group is identified based on the incident under consideration, ie hands-on clinical staff and those involved in contact with healthcare equipment. Different levels of screening may be required for different groups.

7. Occupational Health Staff Screening Protocol

NHS Lothian Occupational Health and Safety Services will maintain a staff screening protocol for HAI incidents and outbreaks which maintains staff confidentiality. This general protocol can be reviewed prior to use, in the light of the actual HAI incident/outbreak which has triggered its use.

This protocol is required to:

- 1 Seek and document informed consent to be screened, including provision of staff support and pre-screening counselling if required.
- 2 Specify the procedure for the screening tests to be carried out, including consideration of Occupational Health staff training and competence.
- 3 Agree a system with laboratory services which maintains staff confidentiality – such that only Occupational Health holds details of names of staff screened and their results.
- 4 Set out a system for informing staff of the results, including support and counselling if required.
- 5 Set out a system for the implementation of IMT recommendations.

8. IMT Actions Following Decision to Screen

Once a decision to screen has been confirmed, the IMT including Occupational Health, Partnership, ER and management representatives must:

- 1 Prepare and approve a written explanatory sheet for staff on the need and relevance of screening in this situation.
- 2 Prepare and approve a written brief note for staff on the organism to be screened for.
- 3 Review Occupational Health procedure with specific attention to the incident in hand.
- 4 Prepare and approve a timed programme for the implementation of the screening including:
 - 3.1 provision of written information;
 - 3.2 staff briefs to explain the justification, procedure and possible outcomes;
 - 3.3 timings and locations of screening clinics;
 - 3.4 timings when results will be available;
 - 3.5 feedback to staff of anonymised results and relevance to the incident/outbreak;
 - 3.6 timing and system for face-to-face individual feedback to staff with positive results.
- 5 List proposed arrangements for staff following screening in the following categories:
 - 5.1 those found to be clear;
 - 5.2 exclusion requirements (if any) for those
 - (i) found infected with the organism of interest;
 - (ii) found colonised or able to pass on the organism of interest;
 - 5.3 treatment recommendations (if any) for those identified in 5.2 above;
 - 5.4 return to work requirements for those in category 5.2 and 5.3 above.

9. Staff Support and Communications

Incidents and outbreaks of infection can be particularly stressful and challenging for staff. 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 NHS Lothian.

The IMT must ensure that staff are fully supported throughout the screening process. Support should include:-

- clear written information explaining the process for screening and management of staff during this process (see appendix 1);
- briefing sessions and where practicable one-to-one meetings with members of staff to explain the screening process and discuss any concerns;
- regular written and verbal updates on events around the incident or outbreak;
- early access to confidential staff counselling;
- early access to Occupational Health.

10. Management of Staff Refusing to be Screened

Staff 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 member of staff to participate in the screening process will be viewed seriously. If a member of staff refuses to participate in screening the following actions should be taken:-

- The employee should be offered counselling and support, and through one-to-one discussions be given further opportunities to participate in the screening process. The employee is entitled to have a staff representative or work colleague present at any meetings.
- Persistent refusal to be screened may pose a potential risk to patients and staff. Dependent on the seriousness of the incident or outbreak, it may be necessary to suspend the employee from duty whilst further investigation of risk is undertaken. Suspension would be on full pay and for no longer than 4 weeks.
- In some circumstances it may be necessary to investigate the employee's conduct under the terms of *NHS Lothian's Management of Employee Conduct Policy: Disciplinary Policy and Procedure*.

11. Management of Staff Testing Positive and Treatment Failure

11.1 Absence from Work

As soon as it is established that an employee is colonised or infected with the identified organism(s), if deemed appropriate Occupational Health will advise the line manager to place the individual on Special Leave.

The period of absence will not be classified as sickness absence but as Special Leave, and the employee will receive full pay including any enhancements normally received.

Confidentiality will be maintained as far as possible throughout this process. The only exception would be circumstances where the identification of a positive result is of vital importance in relation to investigation of the incident/outbreak, and the details of the positive individual need to be disclosed to relevant management to allow necessary corrective actions to be taken.

11.2 Role and Responsibility of Occupational Health.

The Occupational Health Lead who is a member of the IMT will oversee the treatment programme for employees, and will keep line managers advised of progress. The role of Occupational Health is outlined in Appendix 2.

11.3 Treatment Failure

If following treatment the criteria laid down for return to work are not met, Occupational Health will co-ordinate a risk assessment process. If it is concluded that the member of staff is unable to return to his/her original post, Occupational Health will advise the individual accordingly. A case conference will then be convened with the relevant Occupational Health professional, the line manager, the staff member, their staff representative or work colleague if wished and an HR Adviser. The purpose of this meeting should be explained, including discussion of the nature of the infection/colonisation and the reasons why the employee is not able to return to their original post, and to discuss employment options.

11.4 Refusal to Accept Recommended Treatment

If for any reason a member of staff refuses to accept the recommended treatment, the same provisions will apply as for treatment failure.

11.5 Redeployment

In circumstances where a member of staff is unable to return to their original post, NHS Lothian will facilitate redeployment to an alternative role, without detriment to the staff member's pay or conditions.

12. Review of Policy

This policy will be reviewed by the Lothian Partnership Forum after a period of two years in operation.

Guidance on Staff Communications

Local systems will provide guidance for employees, on a face-to-face basis and in writing, on the following:

- what specific organism(s) are being screened for;
- details of the screening process, including the nature of specimens and the follow up screening of staff identified as being positive;
- information relevant to the particular organism involved;
- who are the target groups of staff;
- timeframe for carrying out screening;
- what support will be provided to staff;
- how confidentiality will be maintained;
- management of staff refusing to be screened;
- management of staff testing positive, including absence and financial arrangements;
- treatment and post treatment screening;
- treatment failure and issues of redeployment.

Role of Occupational Health

The role of Occupational Health should include the following:

- participation in the Incident Management Team (IMT);
- implementation and co-ordination of the screening programme;
- staff support and counselling (including pre-screen counselling);
- development and application of the consent form;
- management of personal data, including appropriate identifier coding of laboratory specimens;
- receipt of results and informing staff;
- ensuring application of Special Leave as appropriate to remove those testing positive from the work environment, and informing the appropriate manager;
- arranging treatment in consultation with the staff member's General Practitioner;
- arranging specialist referrals if appropriate;
- informing the appropriate manager of when the staff member is able to return to work;
- instigation of risk assessment where treatment failure occurs, or where the staff member refuses treatment.