

### The Health and Social Care Act 2008

In this edition of 'Supporting Healthy Practices' we will focus exclusively on the implications of the Health and Social Care Act 2008 following the recent updated Code of Practice. Our intention is to highlight the central occupational health responsibilities in the Regulations which are vital for Dental and GP Surgeries to be knowledgeable of and where necessary, take action in response.

The guidance was published in January 2015 and can be found on the following link [Code of Practice - January 2015](#). The Code of Practice sets out 10 criteria against which the Care Quality Commission (CQC) will judge compliance of each registered care providers. The law states that the Code must be taken into account by the CQC when it makes decisions about registration. It is worth mentioning the detail of the Code of Practice guidance is not mandatory but is considered to represent the basic steps essential for compliance. We would strongly encourage all readers of this newsletter to also access the full Code of Practice in order to completely understand the Regulations and implications for your workplace.

#### What would the CQC expect if they completed a review of your Practice, specifically in relation to Occupational Health?

The two essential criteria relevant to a Practices' responsibilities for occupational health in the Regulations are;

- **Criterion 9** - Have and adhere to policies, designed for the individual's care and provider organisations that will help to prevent and control infections.
- **Criterion 10** - Providers have a system in place to manage the occupational health needs of staff in relation to infection

We will look at each of these criteria and offer guidance on the types of activity which should be identified in your workplaces in response. This is a brief synopsis of your Practice's duty for protecting the health of your staff and patients, from our viewpoint. Your Practice may equally have alternative evidence and activities to meet the Code's requirements.

#### Suggested activity to adhere to Criterion 9

- All staff have a clear understanding and are suitably trained in the safe handling and storage of sharps, and this is supported by a freely available employee policy.
- Unprotected medical sharps are replaced with a 'safer sharp' e.g. those with a shield or cover that slides or pivots to conceal the needle after use.
- Exposure to blood borne viruses (hepatitis B and C and HIV) is reduced by providing all care workers with a course of hepatitis b vaccinations and records of employee immunity status is regularly maintained.
- A process to indicate the action staff should take in the event of exposure to blood and body fluids which includes the need to seek immediate advice following an incident and access to post-exposure prophylaxis for hepatitis B and HIV where indicated, and ongoing follow up screening where required.
- All staff have access to a policy to indicate appropriate response in the outbreak of a communicable disease, detected by a Practice. The Practice may also retain suitable communicable disease immunisation status details on care workers, or contract with an occupational health provider to retain immunisation status information for the staff group.



## Suggested requirements to adhere to Criterion 10 include -

- New starter screening for communicable disease and provision of relevant immunisations is available, dependant on work activity. Communicable diseases required to be screened upon employment include tuberculosis, MMR, VZV, hepatitis B, C and HIV.
- There is a documented process to regularly review of immunisation status of care workers in line with guidance.
- The Practice has suitable arrangements for identifying and managing staff infected with hepatitis B, C or HIV which includes screening for exposure prone procedures (EPP) in line with Department of Health guidance.
- The Practice has contracted an occupational health provider to carry out risk assessments after occupational exposure to blood and body fluids.
- The Practice has established appropriate access to suitable emergency treatment following an exposure incident, which would include a specific risk assessment for the individual care worker exposed.
- Occupational health advice and guidance is available under circumstances when staff may need to be excluded from work due to infections.

## EPP? Are you clear whether this applies to you and your job?

Exposure Prone Procedures are described as “those invasive procedures where there is a risk that injury to the worker may result in exposure of the patients open tissues to the blood of the worker”. Job roles which are clearly understood to include EPP are where a gloved hand may be in contact with sharp instruments, needle tips or sharp tissues (e.g. spicules of bones or teeth) inside a patients open body cavity, wound or confined anatomical space where the fingertips may not be visible at all times.

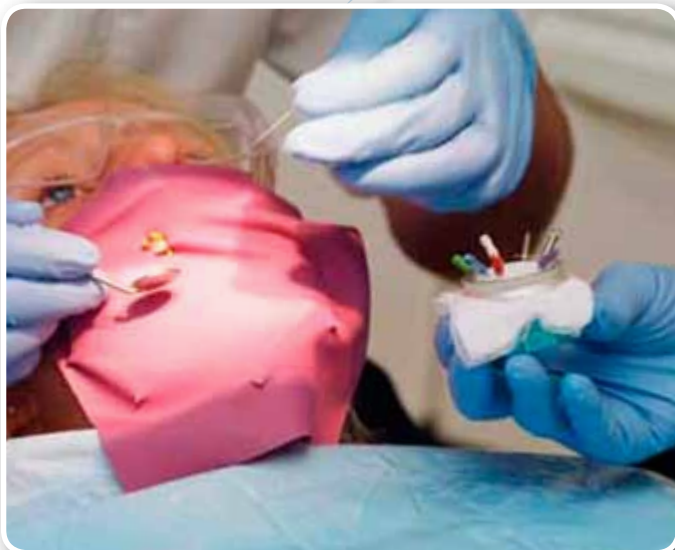
Job roles which are classed as involving EPP's include:

- Dentist
- Hygienists
- General Practitioners providing specialist procedures that meet the above EPP definition. (Minor surgical procedures such as excision of sebaceous cysts, skin lesions, cauterisation of skin warts, aspiration of bursae, cortisone injection into joints and vasectomies do not usually constitute EPP's).

To summarise, underpinning the Code of Practice is a clear requirement for workplaces to commission suitably qualified occupational health services. The services provided by Workplace Health and Wellbeing for NHS Dental and GP Practices have been commissioned across Norfolk and Waveney until September 2015 and meet all the above criterion. We would encourage all Practices to take full advantage of this. It is most vital that each Practice is also aware of their responsibilities that they need to take if at any point in the future occupational health services are no longer funded by NHS England.

## Summary of key activities for Practices to undertake:

- Ensure your Practice has staff suitably vaccinated and screened for Exposure Prone Procedures and communicable diseases.
- Be aware of actions to take in the event of a blood or body fluid exposure incident.
- Reduce the risk of sharps incidents by using “safer sharps” and provide suitable staff training



### Was this information of use?

Are there any occupational health other concerns your Practice requires advice on?  
Does your Practice know about the breadth of occupational health services offered to all NHS GP and Dental Practices in Norfolk **FREE** at the point of contact....?  
For further information on how we can support the health and wellbeing of your organisation please contact our Business Managers,  
**Rachel Hunt** or **Jane Egle** on **01603 286840 / 286667** or visit;  
**[www.workplacehealthandwellbeing.co.uk](http://www.workplacehealthandwellbeing.co.uk)** for further information.

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