

Health and Safety Services From Napthens

Mandatory COVID-19 Vaccination Risk Assessment Guidance

NAP-10823 QCS

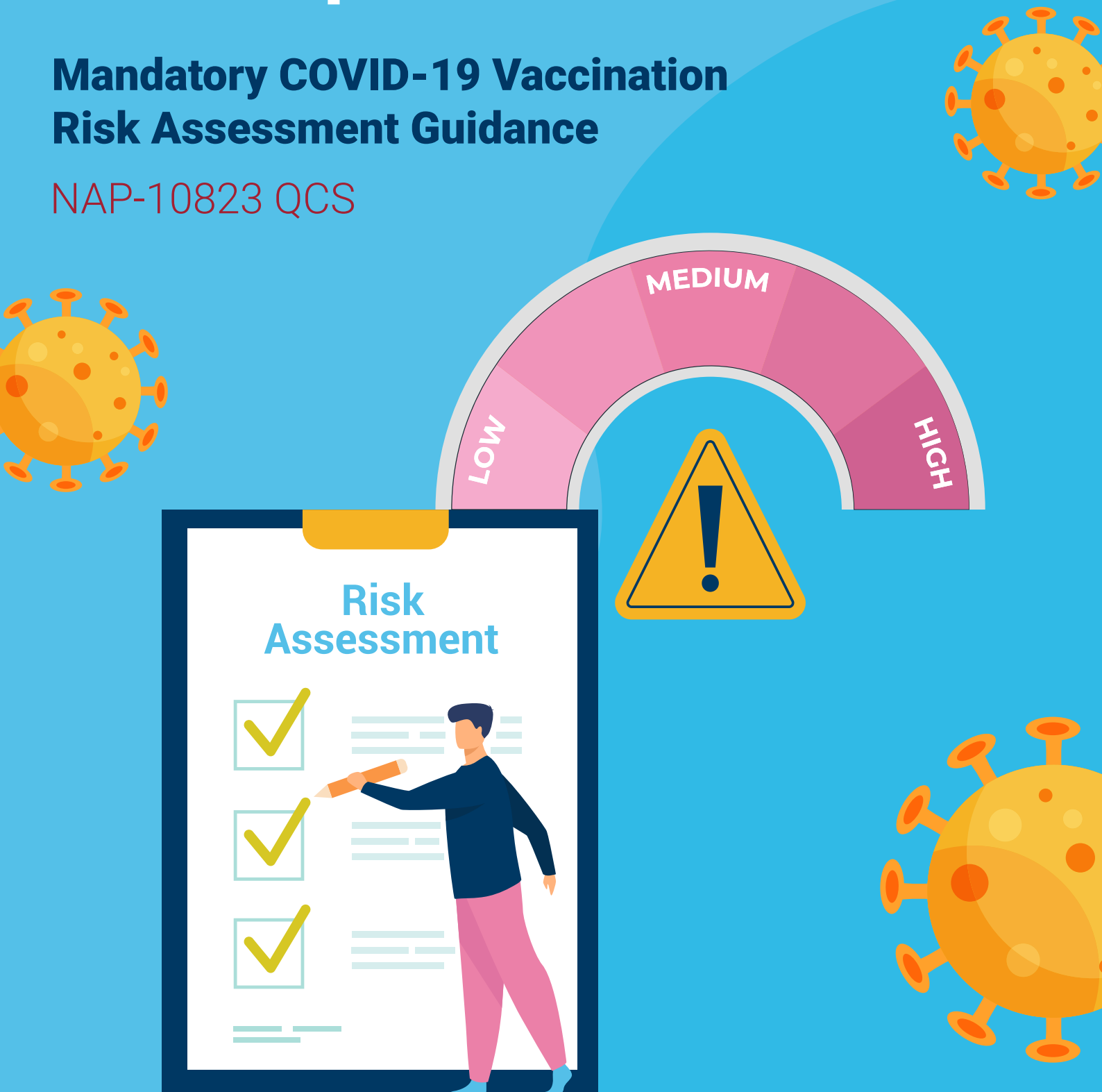


Table 1

The Health and Social Care Act 2008 (Regulated Activities) (Amendment) (Coronavirus) Regulations 2021	
Regulations require ALL CQC Registered Service Providers (or Registered Managers) of accommodation for those who require nursing or personal care in a care home to ensure that access to the care home is restricted as follows. Access to indoor areas of the premises by any person must be prohibited by the Registered Person unless one the following applies to the individual:	
A	The Person is a Service User residing in the premises. (The person resides in the care home used by the Registered Person)
B	The Person has provided the Registered Person with evidence that they have been vaccinated with the complete course of doses of an authorised vaccine. (The individual can provide satisfactory evidence that they have been vaccinated)
C	The Person has provided the Registered Person with evidence that for clinical reasons they should not be vaccinated with an authorised vaccine. (The individual is exempt for medical reasons)
D	Access is required by the Person because it is reasonably necessary for them to enter to provide emergency assistance in the premises.
E	Access is required by the Person because it is reasonably necessary for them to enter to provide urgent maintenance assistance in the premises.
F	Access is required by a Person who is a member of the emergency services executing their duties .
G	The Person is a friend or relative of a service user who is or has been residing in the premises.
H	The Person requires access to visit a service user who is dying .
I	Access is required by the Person because it is reasonably necessary to provide comfort or support to a service user in relation to their bereavement following the death of a friend or relative.
J	The Person who requires access is under the age of 18 .

Table 2

**The Health & Safety at Work Act 1974
The Management of Health & Safety at Work Regulations 1999**

Existing Health & Safety Legislation requires that the operators of businesses, including those within the care sector, take appropriate measures to prevent harm to employees and anyone else who may be affected by their activities, so far as is reasonably practicable. There is a legal duty imposed on all employers to complete an Assessment of Risk which identifies all of the significant hazards associated with their activities and a duty to reduce the risk of harm from these hazards as far as is reasonably practicable.

COVID-19 transmission within the care sector remains a significant hazard and as such, risk assessments for activities within the sector should clearly highlight the risks of transmission and the control measures implemented to reduce these risks.

Existing COVID-19 risk assessments for your activities and premises must be updated to reflect the changes to mandatory vaccination of employees. While this change itself is designed to reduce the risk of transmission through care sector premises and to mitigate the consequences should an individual transmit the virus – the implementation of this rule change does not remove the requirement for all existing COVID-19 control measures.

Those measures implemented to reduce the risk of transmission remain the primary risk controls:

- Infection Prevention Control Measures
- Correct Use of Personal Protective Equipment
- Hygiene Controls
- Adequate Ventilation of Workspaces
- Testing Regimes to Support Exclusion of persons with Positive Tests, Isolation Requirements and Symptomatic Individuals

See Risk Assessment Action Plan (Table 3)

Table 3 Risk Assessment Flow Action Plan



Table 4 Additional Risk Assessment Hazards & Controls (Exempt Unvaccinated Personnel Present)

Hazard Identified	Persons at Risk	Suggested Risk Reduction Controls
Presence of Unvaccinated, Exempt Employees in the Premises	Employees	Reinforce the importance of strict adherence to and supervise and monitor the use of all existing controls in the unvaccinated, exempt workforce.
Poorly Ventilated Workplace Areas	Service Users	Maintain and monitor all existing COVID-19 transmission controls.
Close/Prolonged Contact Activities and High-Risk Procedures	Clinically Vulnerable Persons	Manage transmission risk in line with Government Guidance & Infection Prevention & Control Policies.
Presence of Symptomatic Individuals in the Workplace	Authorised Visitors	Identify poorly ventilated workspaces and avoid unnecessary prolonged gatherings in these areas.
	Authorised Contractors	Improve ventilation by opening windows and allowing fresh air to circulate, where safe to do so.
		Utilise well maintained, cleaned and hygienic mechanical ventilation systems to improve ventilation.
		Consider facilitating remote or homeworking for Unvaccinated, Exempt Employees where this is reasonable and practicable for the role.
		Avoid, so far as is reasonably practicable, the performance of high COVID-19 transmission risk procedures in poorly ventilated spaces – if tasks are unavoidable consideration should be given to the suitability of unvaccinated exempt staff for carrying out these procedures.
		Avoid, so far as is reasonably practicable, the performance of prolonged close contact activities and procedures in poorly ventilated spaces – if tasks are unavoidable consideration should be given to the suitability of unvaccinated exempt staff for carrying out these procedures and activities.
		Avoid close proximity working, organising the workplace to ensure personnel can maintain reasonable distance between them where practical to do so.
		Reinforce the importance of limiting unnecessary prolonged, gathering in communal areas and encourage personnel to limit contacts, both physical and close proximity, where this can be achieved.

		Maintain all existing COVID-19 test programmes and regimes to minimise the risk of presence of symptomatic and symptomatic positive cases in the workplace.
		Identify any service users and service procedures which, due to specific vulnerabilities or procedural risks, are not deemed safe for a non-vaccinated, exempt person to work with or perform and take preventive action accordingly.
		Reassert the importance of safe, effective use of specified PPE for tasks identified as requiring its use.
		Ensure all unvaccinated, exempt employees are retrained in the use of PPE, have an adequate supply of well maintained, appropriate fitting equipment and that its use is monitored and enforced.
		Ensure self-isolation rules are followed and that all personnel are reminded of these requirements and of the symptoms indicative of a COVID-19 infection.
		Maintain enhanced standards of cleaning and hygiene in shared spaces, minimise use of shared equipment where possible and ensure regular cleaning of shared or regular contact surfaces and equipment.