Clinical Sharps Devices Policy

Title: **Clinical Sharps Devices Policy (Health & Safety)**			
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Author/s:	Health & Safety Advisers		
Owner:	Director of Occupational Health & Safety		
Executive Lead:	NHS Lothian Executive Medical Director		
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Version Control

Date	Author	Version/Page	Reason for change
29/01/2015	Director of Occupational Health & Safety	v1.0	Review
01/07/2018	Health & Safety Adviser/s and Clinical Procurement Manager	v1.1-7	Reviewed and reformatted in line with current guidance.
27/08/2019	Health & Safety Adviser/s and Clinical Procurement Manager	v2.0	Approved by PAG (under new document title)
08/12/2022	Health & Safety Adviser/ and Diabetes Specialist Nurses	v2.1-3	Reviewed to include information relating to the use of self-administered devices and information relating to the introduction of the Clinical Sharps App.
07/03/2023	Health & Safety Adviser/ and Diabetes Specialist Nurses	V3.0	Approved by Policy Approval Group

Executive Summary

Clinical sharps devices are used across NHS Lothian.

- This policy must be made available to all medical/clinical and support staff including Health and Social Care Partnerships Council staff involved in, or as part of, patient care and where there is any exposure to clinical sharps.
- The use of 'safer clinical sharps devices' will be kept under review by the NHS Lothian Health and Safety Committee for their effectiveness in reducing harm.
- Operational management teams to ensure that risks from the use and disposal of clinical sharps devices are assessed, and effective control measures are implemented and monitored to prevent/reduce the likelihood of injury from clinical sharps devices.
- High risk tasks/procedures that involve the use of clinical sharps devices must be identified and assessed in the first instance e.g., venepuncture, cannulation.

Should clinical staff decide that other risk factors such as patient safety, comfort or clinical procedures outweigh the use of the clinical sharps safer device then they must record this on the Clinical Rationale for the Use of Non-Safety Devices form via the Clinical Sharps Rationale App

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Contents

1.0 Purpose

The purpose of this policy is to ensure that there are safe systems of work in place to protect employees, and others, from the hazards inherent in the use of clinical sharps devices, and to ensure that all activities involving a clinical sharps device are conducted in a manner that does not jeopardise an employee or other person's health and safety.

This policy, and associated procedure, are also relevant to contamination injuries e.g., exposure to blood or other body fluids, skin, or cases of mucosal exposure.

2.0 Policy statement

The policy of NHS Lothian is to ensure the provision of safe and reliable systems of work in the use and disposal of clinical sharps devices. Where available, NHS Lothian will always provide safety engineered devices.

NHS Lothian Board (referred to in this policy as NHS Lothian) recognises its responsibilities under Health and Safety legislation, and the duty to protect, so far as reasonably practicable, all patients, employees, contractors, students and pupils on placements, voluntary workers, visitors including members of the public, from injury resulting from inappropriate use or disposal of 'clinical sharps devices'.

NHS Lothian is committed to complying with the requirements of the Health and Safety (Sharp Instruments in Healthcare) Regulations 2013 to ensure the prevention of clinical sharps device injuries, and to avoid the unnecessary use of sharps where it is reasonably practicable to do so.

3.0 Scope

The Health and Safety, Sharp Instruments in Healthcare Regulations 2013 place an implicit duty on NHS Lothian, as the employer, and any contractor working for NHS Lothian, to co-operate and share information to manage the risks from the use of clinical sharps devices.

This policy applies to and includes not only medical/clinical staff using a clinical sharps device(s) throughout NHS Lothian, but also where a person is at risk of a clinical sharps device injury or a contamination (from body fluids) injury while on NHS Lothian premises, or working under the management and supervision of NHS Lothian staff. For example:

- Facilities Management staff such as porters, domestics, maintenance personnel, catering, laundry, and decontamination
- Bank nurses and other agency workers contracted to work in NHS Lothian.
- Health and Social Care Partnership council staff
- NHS Lothian clinical staff working in prisons, schools, or other non-healthcare workplaces
- NHS Lothian staff providing care to people in their homes or in the community

- Clinical placements or other workplace training under the management of NHS Lothian
- Authorised contractors working on NHS Lothian premises
- Self-administering patients

4.0 Definitions

Medical Sharp: an object or instrument which is used for carrying out activities specific to healthcare and which can cause injury by means of cutting or piercing the skin.

The Health and Safety Executive (HSE) use this terminology, however, for the purposes of this policy NHS Lothian will use the wording 'clinical sharp (safety) device' e.g., guard protected (safety engineered) hypodermic needle or similar protected device

Clinical Sharp Safety Device: a device which has been safety engineered and is known generically as either 'safer needle devices' or 'safety devices'. These have a built-in safety feature to reduce the risk of sharps injury before, during or after use. Devices can be passive or active.

Body fluids: Blood, pleural fluid, blood-stained low-risk fluid, saliva associated with dentistry, semen, vaginal secretions, breast milk, synovial fluid, blood-stained body fluids e.g., urine, vomit, peritoneal fluid, amniotic fluid, pericardial fluid, unfixed tissues and organs.

Passive devices are devices which have an automatic mechanism that is activated after use.

Active devices are devices which need to be manually activated by a member of staff.

Clinical Sharp (Non-Safety) Device: unprotected/non engineered Clinical Sharps Device

Higher-Risk Procedures: There is a higher risk of infection from a sharps injury involving hollow-bore needles. Higher-risk procedures include e.g., intra-vascular cannulation, venepuncture and injections, needles and syringes, and phlebotomy needles.

Significant Occupational Exposure is a percutaneous or mucocutaneous exposure to blood or other body fluids from a source that is known, or found to be positive, for a blood borne virus (BBV) infection.

5.0 Implementation roles and responsibilities

The overall framework of accountability and responsibility for managers and staff in the implementation of this policy follows that laid out within the NHS Lothian Health and Safety Policy.

More detailed responsibilities in relation to the management of the clinical sharp's devices risk are described below:

5.1 Service/Departmental Managers:

- Are required to communicate and discuss the Clinical Sharps Policy with their staff.

- Work with their teams to carry out a risk assessment for the safe use and disposal of clinical sharps devices, considering self-administering medication patients, where required, seeking safer alternatives and/or any risks from exposure to blood or other body fluids.
- Ensure that staff use the clinical sharps safety device(s) made available to them.
- Ensure that staff that who use and dispose of clinical sharps devices (including bank staff and others) are aware of the hazards, risks and the control measures required to undertake the work safely.
- Ensure that all staff who use and dispose of clinical sharps devices are provided with suitable and sufficient information, instruction, and training, specifically:
    - Displaying the NHS Lothian 'Managing sharps and contamination injuries' poster in the department.
    - Completing the NHS Lothian 'Sharps and Contamination' LearnPro module in conjunction with the NES Prevention and Management of Occupational Exposures' eLearning for clinical staff and medical staff.
    - Are aware that Staff Support and Counselling can be accessed, if required, after a clinical sharps incident.
- Ensure staff training records on the use of clinical sharps devices are in place, readily accessible and kept up to date, including records where a sharps representative has provided relevant education relating to sharps instruments.
- All adverse events involving clinical sharps devices, or exposure to blood or other body fluids, whether causing injury or otherwise, are reported via DATIX and are investigated following the process laid down in the NHS Lothian Adverse Event Management Policy and Adverse Event Management Procedure.
- Ensure that staff are aware of the steps to take if they experience a clinical sharps device injury and/or exposure to blood or other body fluids contamination injury, and the requirements of the NHS Lothian Working with Blood Borne Viruses Policy.
- Ensure that clinical sharps devices are disposed of at point of use, direct to a sharps container and via the correct waste stream.
- Ensure that patients who self-administer medication within NHS Lothian premises are provided with a clinical sharps devices container for their individual use.
- Ensure that staff understand that, where patients who have been identified as being capable of self-administering via a 'non safer' clinical sharps device and are unable to self-administer on their own volition, a safer alternative **must** be sought to allow staff to safely administer medication.
- Ensure that where there are tasks with specific hazards, where a risk assessment can demonstrate that on balance of risk it is appropriate not to use the safer medical device, a 'Clinical Sharps Rationale for the use of Non-Safety Devices electronic form' (via the Application) **must** be completed for approval to use the identified non-safety device.

5.2 Staff

- All staff are accountable for their own actions and must follow all policies and procedures designed to ensure safer ways of working, including actions to prevent a clinical sharps device injury, or exposure to blood or other body fluids contamination injury.
- All staff must contribute to the risk assessment process when requested.
- Follow the control measures identified in the risk assessment and any instruction(s) provided where a safe system of work is used.
- Ensure any information, instruction, training, or supervision to minimise exposure to a clinical sharps device injury or exposure to blood or other body fluids contamination injury, is understood and completed in line with essential training for clinical staff (every three years).
- Ensure completion of the NHS Lothian 'Sharps and Contamination' LearnPro module in conjunction with the NES Prevention and Management of Occupational Exposures' eLearning for clinical staff and medical staff.
- Attend training and any updates or refreshers provided to maintain their skill level in the use of clinical sharps devices.
- Undertake any required actions relating to a clinical sharps injury or exposure to blood or other body fluids contamination injury, in line with the requirements of the NHS Lothian Working with Blood Borne Viruses Policy.
- Use the clinical sharps safety device recommended by, and available in, NHS Lothian.
- Dispose of clinical sharps devices at point of use, directly into a sharps container via the correct waste stream.
- Staff must use safer sharps in accordance with the manufacturer's recommendations and must not alter, amend, or defeat the clinical sharps device(s) or its features.
- Report any clinical sharps device or exposure to blood or other body fluids contamination injury adverse event on the DATIX system.
- Where required, access Staff Support and Counselling after a Clinical Sharps Injury or exposure to blood or other body fluids contamination injury.
- Follow the NHS Lothian Clinical Sharps Procedure.

6.0 Associated materials

NHS Lothian Clinical Sharps Procedure approved by NHS Lothian Health & Safety Committee, August 2019

NHS Lothian Working with Blood Borne Viruses Policy approved by Policy Approval Group, May 2021

NHS Lothian Operational Procedure for Working with Blood Borne Viruses approved by NHS Lothian Health & Safety Committee, May 2021

NHS Lothian Policy for Prophylactic Treatment or Immunisation following Occupational Exposure to Infectious Diseases approved by Lothian Partnership Forum, August 2014

NHS Lothian Adverse Event Management Policy approved by the Policy Approval Group, June 2018

NHS Lothian Adverse Event Management Procedure approved by the Policy Approval Group, June 2018

Inpatient Diabetes Resources — Edinburgh Centre for Endocrinology & Diabetes (edinburghdiabetes.com), Clinical Guidance Document, In-patient Use and Supply (2017 update)

7.0 Evidence base

Existing health and safety legislation requires employers to protect workers from the risk of injury from clinical sharps devices and exposure to biological agents:

- The Health and Safety at Work Act (1974)
- The Health and Safety (Sharp Instruments in Healthcare) Regulations (2013)
- Control of Substances Hazardous to Health Regulations (2002)
- Management of Health and Safety at Work Regulations (1999)
- Personal Protective Equipment at Work Regulations (1992)
- Provision and Use of Work Equipment Regulations (1998)
- Reporting of Injuries, Diseases and Dangerous Occurrences (2013)

8.0 Stakeholder consultation

Clinical Services, Partnership Representatives and the Health and Safety Advisory Team, Clinical Education have been consulted in the review of this policy

9.0 Monitoring and review

9.1 Proactive management

The management and use of clinical sharps devices is reviewed and reported on annually as part of the Health and Safety Management (HSM) Quarterly Reporting System.

Documented information is gathered at ward/department level and then provided to the Service(s)/HSCP Management Teams. Health and Safety assurance reports are then provided to the respective local Health and Safety Committees. This information is then provided to the NHS Lothian Health and Safety Committee with the overall NHS Lothian risk assurance level for clinical sharps then provided to the Staff Governance Committee.

The compliance of eLearning for 'Sharps and Contamination' is monitored as part of the HSM quarterly reporting system and should be monitored at local Health & Safety Committees.

Operational managers must also undertake monitoring of the tasks where clinical sharps devices are involved to ensure compliance with procedures through, for example, the use of Infection Prevention Control Audits, Safety Tours/Walk rounds or similar checks or visits.

Each Service/Department must comply with the requirements of the Infection Prevention and Control Manual in relation to the safe use and disposal of clinical sharps devices.

9.2 Reactive management

All adverse events involving clinical sharps devices must be reported using the DATIX system and investigated in line with the NHS Lothian Adverse Event Management Policy and Adverse Event Management Procedure.

Where a member of staff experiences a clinical sharps device injury exposure from a known high-risk source (a carrier of a Blood Borne Virus), this **must be** reported to the HSE as a dangerous occurrence to meet the requirements of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR).

Where there has been a Significant Occupational Exposure, a notification should be made to Health Protection Scotland as required.

9.3 Review

This policy will be subject to review and updated every 3 years, or as a result of any changes in level of risk and/or in legislation which may occur before this. The review and update will be undertaken by key stakeholders in the policy, including Clinical Services, Clinical Procurement, Partnership Representatives and the Health and Safety (H&S) Advisory Team.

This policy may also be subject to review if new guidance or legal opinion is issued, or if NHS Lothian identifies a need for revision as the result of inspection, audit or following investigation of an adverse event.

The effectiveness of this policy may also be monitored and evaluated using the outputs from:

- Significant Adverse Event (SAE) Reviews
- DATIX investigations
- Complaint investigations/improvement plans
- Health & Safety Quarterly Reports (compliance with relevant policies/risk assessments)