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Clinical Sharps Devices Policy |
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**Owner:** | Head of Health and Safety |
| **Executive Lead:** | NHS Lothian Executive Medical Director  
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Executive Summary

- Due to the wide use of clinical sharps devices 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.
- 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 will ensure that risks from the use and disposal of clinical sharps devices has been assessed and effective control measures are in place and implemented to prevent/reduce the likelihood of injuries from a clinical sharps device.
- High risk tasks/procedures that involve the use of clinical sharps devices must be identified 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 (Opt out form)
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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.

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 the 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 and visitors as well as 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 regulations 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 while on the premises of 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 etc.
- 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.
- 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 is able to 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 safer needle device(s) 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.

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

**Active devices** need to be manually activated by the 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.

5.0 Implementation roles and responsibilities

The overall framework of accountability and responsibility for managers and staff on 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 sharps devices risk are described below:

5.1 **Service/Departmental Managers:**

- Are required to communicate and discuss the Policy with their staff.
- Work with their teams to complete a risk assessment for the safe use and disposal of clinical sharps devices, taking into account self administering medication patients where required.
- Ensure that staff use the clinical sharps safety device(s) made available to them.
- Ensure that staff 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 staff who use and dispose of clinical sharps devices are provided with suitable and sufficient information, instruction and training.
− Ensure staff training records on the use of clinical sharps devices are in place, readily accessible and kept up to date.

− Ensure that all adverse events involving clinical sharps devices, 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 Operational Procedure.

− Ensure that staff are aware of the steps to take if they suffer a clinical sharps device injury and the requirements of the NHS Lothian Working with Blood Borne Virus Strategic 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 a clinical sharps devices container for their individual use.

− Where it has been assessed that non safety clinical sharps devices are the best option, then the Clinical Rationale for the Use of Non Safety Devices form (opt out form) must be completed. Once completed it should be sent for notification, final approval and sign off to the Clinical Director or Clinical Nurse Manager for the Service.

5.2 Staff

− 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.

− Complete any education/training required to minimize exposure to a clinical sharps device injury and the actions to take in line with the requirements of the NHS Lothian Working with Blood Borne Virus Strategic Policy.

− Attend training and any updates or refreshers provided to maintain your skill level in the use of clinical sharps devices.

− Use the clinical sharps safety device recommended and available in NHS Lothian.

− Dispose of clinical sharps devices at point of use direct to a sharps container via the correct waste stream.

− Report any clinical sharps device adverse event on the DATIX system.

− Staff should 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.

− 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.
6.0 Associated materials

NHS Lothian Clinical Sharps Devices Procedure
NHS Lothian Model task based risk assessment(s)
NHS Lothian Working with Blood Borne Viruses Strategic Policy
NHS Lothian Policy for Prophylactic Treatment or Immunisation Following Occupational Exposure to Infectious Diseases
NHS Lothian Adverse Event Management Policy and Operational Procedure
NHS Lothian Management of Sharps Performance Standard
NHS Lothian Record of Clinical rationale for the Use of Non-Safety Sharp Devices

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, Clinical Procurement, Partnership Representatives and the Health and Safety Advisory Team, Clinical Education.

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 Quarterly Reporting System. Documented information is gathered at ward/department level and then provided to the Service(s)/HSCP Management Teams. Reports are then provided to the respective Health and Safety Committees. This information is then provided the NHS Lothian Health and Safety Committee with the risk assurance level provided to the Staff Governance Committee.
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 Operational Procedure.

Where a member of staff suffers a clinical sharps 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 (i.e. a 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 BBV infection) notification should be made to Health Protection Scotland as required.

9.3 Review

This policy will be subject to review and update every 3 years. 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 Advisory Team.

This policy may also be subject to review if new guidance or legislation changes or NHS Lothian has a serious case that through a system failure(s) merits the policy to be reviewed.