



Derogation for the return to work of Healthcare Workers (HCW) who have been advised to restrict their movements BUT are identified as essential for critical services – Version 3 30th Mar 2020

Introduction

This document refers to HCWs who are restricting their movements due to Close Contact with a COVID-19 case, due to international travel after 6pm on the 16th Mar 2020 and other HCWs who are required to self isolate or restrict movements but who are deemed lower risk.

Many areas are experiencing a shortage of HCWs as a result of COVID-19 and the requirement for HCW to self isolate or restrict movements. This measure is being put in place to mitigate the risks in the direct provision of services for patient in critical areas within services while also ensuring on-going staff safety.

Process for Derogation

1. The Healthcare Workers (HCWs) who may receive a derogation to return to work on monitoring are outlined in Appendix 1.
2. Managers should ensure the following process as per checklist – Appendix 2.
3. A detailed local risk assessment is to be undertaken in relation to the risk to patient safety due to absences of essential HCWs.
4. This process should include an assessment of available personnel to meet the evolving needs where patients discharges have been optimised, OPD services have been significantly reduced and where all possible services have been moved to alternative locations. This will allow for a pool of HCWs to be freed up, due to the reduction in scheduled services and accelerated patient discharges and who can be redeployed within the service.
5. All efforts have been made to recruit alternative HCWs with the necessary skills.
6. If, despite these actions, an area cannot be staffed safely or a critical skill set to provide critical/essential services is unavailable, then derogation from management may be given to HCW from the identified critical services to return to the workplace and Occupational Health will be notified.
7. For close contact HCWs, consideration must be given to the fact that, if unprotected close contact involved aerosol generating procedures, then the HCW would have a higher risk of exposure to COVID-19. HCWs whose contact did not involve AGPs should be returned first where possible. Occupational Health can advise of close contact AGP exposure.
8. For close contact HCWs Occupational Health can advise if the risk of returning the HCW to work is unacceptably high, for example due the AGP exposure or other high risk exposures such as multiple exposures in a cluster.

9. In the event such a requirement is made, the HCW will be actively monitored twice daily by their line manager (to include temperature check, which must be < 37.5°C), once prior to starting their shift and at one point during their shift.
10. Occupational Health must be informed of HCWs requiring **Active Monitoring only**. Daily active monitoring will also be carried out by Occupational Health for these HCWs, usually via daily text message system.
11. Other HCWs who may be considered for a derogation from management (see appendix 1):
 - A HCW, with a household contact who is symptomatic and self-isolating, awaiting testing/results.
 - A HCW, with a household contact who is symptomatic, but does not fit the criteria of a suspect case, and will not therefore be tested.
 - A HCW who had symptoms, but did not fit the criteria of a suspect case, was not tested and is now at least 48 hours symptom free.
12. These HCWs can return to work while passive self-monitoring for symptoms. The manager must advise them of this requirement prior to their return. There is no requirement to inform Occupational Health.
13. All HCWs will be under strict instructions from their manager to self isolate and follow OH guidance for testing should they become symptomatic.

Useful links:

Risk Assessment of Healthcare Workers with Potential Workplace Exposure to Covid-19 Case
<https://www.hpsc.ie/a-z/respiratory/coronavirus/novelcoronavirus/guidance/occupationalhealthguidance/>

Information on restricting movements see
<https://www.hpsc.ie/a-z/respiratory/coronavirus/novelcoronavirus/traveladvice/>

Information on Aerosol Generating Procedures
<https://www.hpsc.ie/a-z/respiratory/coronavirus/novelcoronavirus/guidance/infectionpreventionandcontrolguidance/>

Telephone Assessment, Testing Pathway and Return to Work of Symptomatic Healthcare Workers Version
<https://www.hpsc.ie/a-z/respiratory/coronavirus/novelcoronavirus/guidance/occupationalhealthguidance/>

Appendix 1 – Healthcare Workers Considered for Derogation

Type	Status	Advice for HCW	Derogation from Management as 'Essential' HCW	Monitoring required in the workplace following derogation*
1.	Symptomatic HCWS with a Positive COVID 19 Test Result.	<p>Must self-isolate 14 days from the onset of their symptoms.</p> <p>May RTW 14 days after the onset of symptoms AND</p> <ul style="list-style-type: none"> • Must be without fever for 5 days before RTW AND • Must be medically well before RTW. 	Not an option.	Not applicable.
2.	<p>Symptomatic HCWS with a Negative COVID 19 Test Result who:</p> <ul style="list-style-type: none"> • Are not returning from overseas • Do not have symptomatic household contacts • Are not close contacts of a confirmed case (household or workplace) 	May RTW once asymptomatic for > 48 hours.	Not required or indicated	Not Required.
3.	Symptomatic HCWS who do not fit the COVID 19 criteria for testing.	<p>Must self-isolate 14 days from the onset of their symptoms.</p> <p>Without derogation as Essential HCW, may RTW 14 days after the onset of symptoms AND</p> <ul style="list-style-type: none"> • Must be without fever for 5 days before RTW AND • Must be medically well 	With derogation as Essential HCW from management, the HCW may RTW once asymptomatic for > 48 hours	Passive self-monitoring for symptoms. The HCW will self-isolate immediately if symptoms develop.
4.	<p>HCWs who are</p> <ul style="list-style-type: none"> • Close Contacts of a Confirmed COVID 19 Case (healthcare or household) • Returning from Overseas 	Must Restrict Movement for 14 days	With derogation as an Essential HCW from management, the HCW may RTW once asymptomatic for > 48 hours	Active monitoring twice daily by manager and daily by Occupational Health
5.	<p>HCWs who have symptomatic household contacts who</p> <ul style="list-style-type: none"> • Are awaiting testing/results • Don't fit criteria for testing • Are not a confirmed COVID 19 case 	Must Restrict Movement for 14 days	With derogation as an Essential HCW from management, the HCW may RTW once asymptomatic for > 48 hours	Passive self-monitoring for symptoms. The HCW will self-isolate immediately if symptoms develop.

Appendix 2 - Derogation Checklist for Line Manager

Service: _____	Unit: _____
Manager Name: _____	Job Title: _____

Employee Name: _____	Job Title: _____
Date Commence Restricted Movement/Isolation: _____	
Reason for Restricted Movement/Isolation (Type 3 – 5): _____	

Risk Assessment for the Derogation of a Healthcare Worker on Restricted Movement/Isolation to Return to work	
Are there other available HCWs from non-essential services who may be redeployed for this role:	Yes <input type="checkbox"/> No <input type="checkbox"/>
Can efforts be made to reduce capacity in non-essential services, allowing redeployment of another HCW to this role:	Yes <input type="checkbox"/> No <input type="checkbox"/>
Have efforts have been made to recruit alternative HCWs with the necessary skills	Yes <input type="checkbox"/> No <input type="checkbox"/>
Is this HCW role critical to ensure essential services continue	Yes <input type="checkbox"/> No <input type="checkbox"/>
Is this HCW a Healthcare related Close Contact:	Yes <input type="checkbox"/> No <input type="checkbox"/>
1. Was their contact during Aerosol Generating Procedures:	Yes <input type="checkbox"/> No <input type="checkbox"/>
2. Did they have contact with multiple index cases:	Yes <input type="checkbox"/> No <input type="checkbox"/>
If Yes to either 1 or 2 then higher risk contact. Request opinion from Occupational Health on the risk/benefit of returning the employee to work.	
Can you manage twice daily active monitoring if required	Yes <input type="checkbox"/> No <input type="checkbox"/>

<u>Decision for the Derogation of the Healthcare Worker</u>
Based on the risk assessment this HCW can return to work on a derogation: Yes <input type="checkbox"/> No <input type="checkbox"/>
I will ensure that the appropriate monitoring is carried out in line with the Guidance for the Derogation for the return to work of Healthcare Workers (HCW) who have been advised to restrict their movements BUT are identified as essential for critical services’.
Manager Signature: _____ Date: _____
Period for Derogation: _____ to _____