

Compliance Update for Bank and/or Agency Workers (Individual Risk Assessments)

In alignment to previously communicated [DHSC, NHSE&I and approved framework guidelines for agency use during COVID-19](#) we write to further reinforce the importance of conducting robust individual risk assessments for bank and/or agency workers, and to outline requirements when providing services to Healthcare Providers. Individual risk assessments are especially important for bank and/or agency workers as the nature of their work means that they more regularly work in contexts that are unfamiliar to them than substantive staff, and identifying those who are able to give support may be more challenging.

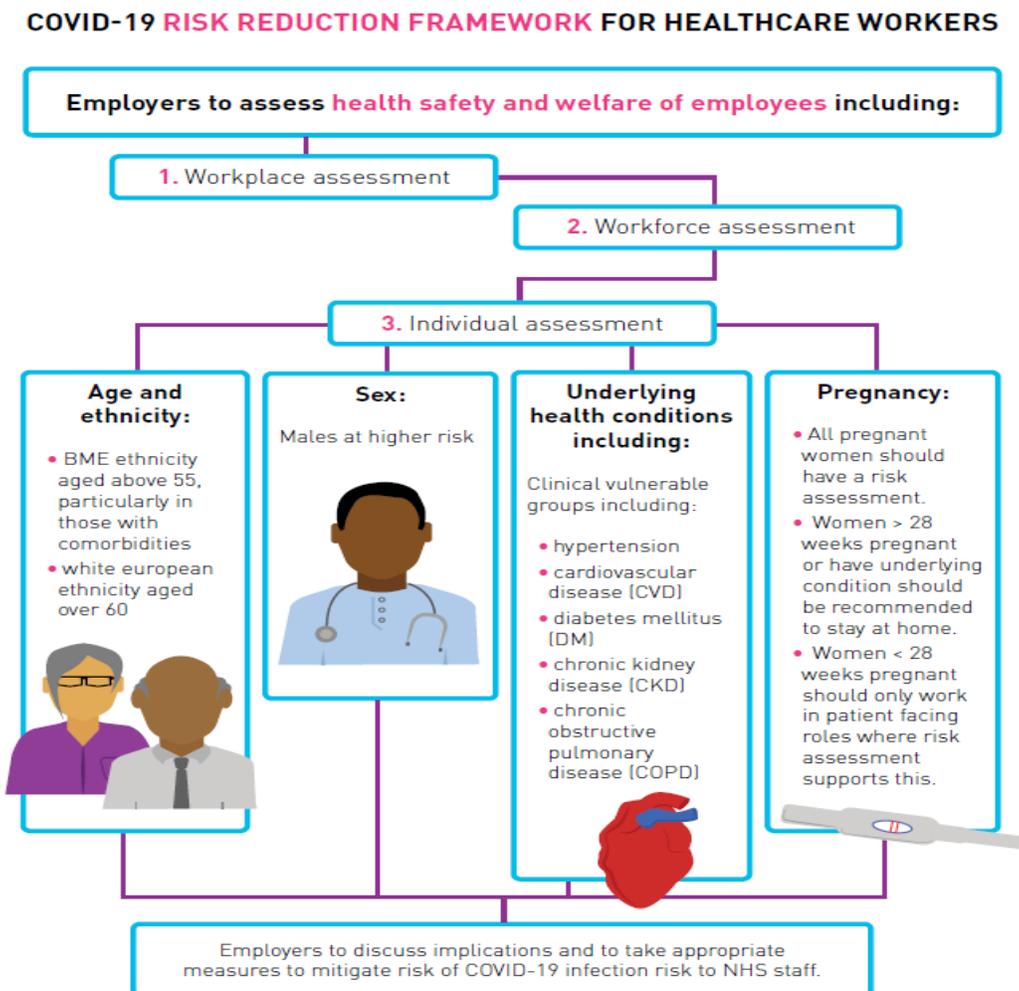
Whilst we appreciate the majority of the supplier community have implemented robust policies already, the below guidance has been drafted on request of our mutual customers to reinforce that the requirements are not optional, and to ensure a consistent approach is undertaken in alignment to currently published guidelines. For ease of reading and convenience we have broken down the guidance into bullet points, as below:

- **To confirm, suppliers of bank and/or agency staff are required to undertake risk assessments for COVID-19, not just the ‘employer’.**
 - Note this requirement includes updating existing compliance processes to assess bank and/or agency staff registered with your organisation for any potential risks.
 - Identified risks must be openly shared with customers where there is an existing booking, or where the member of staff wishes to undertake a booking with the customer; following this a local workplace risk assessment can then be undertaken as appropriate. The intention of this process is to protect individual workers and allow customers to provide the appropriate level of personal protective equipment (PPE) to individuals, in accordance with local customer policy.
 - Bank and/or agency staff may be requested to work in different areas/departments at short notice as part of any workplace assessment conducted locally by a customer.
- [NHS Employers guidance on risk assessments for staff](#) resources are available to support suppliers in ensuring alignment to framework guidelines, these clearly identifying factors that organisations should consider for individuals in their workforce who are at higher risk should they contract Covid-19. These factors - where identified - should always be discussed between those managing services (suppliers of bank and/or agency staff in this case communicating with customers) and individual workers, with suppliers and customers taking advice from occupational health and HR colleagues where necessary.
- Tools and resources outlined in the NHS Employers guidance - including the [risk reduction framework paper](#) - should be reviewed and considered as part of any approach, to ensure that risk assessments are managed robustly and in alignment to national guidance.

- All staff should be offered a risk assessment. However, the following groups have been found to be at increased risk associated with COVID-19 ('at-risk'):
 - Black, Asian and minority ethnic staff (BAME), aged 55+, particularly those with morbidities.
 - White, aged 60+
 - Male
 - Having underlying health conditions including Hypertension, Cardiovascular Disease (CVD), Diabetes, Chronic Kidney Disease (CKD), Chronic Obstructive Pulmonary Disorder (COPD), or Obesity.
 - Pregnant

Additionally, in light of emerging scientific evidence, all BAME staff are now included in this category of risk assessment

An example of a Risk Assessment Workflow



A. Risk reduction framework needs to be used in conjunction with NHS Employers' guidance.

B. Employers need to take into consideration health care settings such as primary or community care, hospital settings or environments where aerosol generating procedures are performed.

Source: Risk reduction framework for NHS staff at risk of COVID-19 infection, Faculty of Occupational Medicine