School of Medicine: Exposure Prone Procedures Policy for Medical Students (2018)

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Contents

What is an Exposure Prone Procedure (EPP)? ................................................................. 3
Who is allowed to carry out EPPs? .................................................................................. 3
Are medical students allowed to perform EPPs? .......................................................... 4
EPP clearance and standard clearance ........................................................................... 4
What procedures are classed as exposure prone? ....................................................... 5
Are medical students allowed to carry out EPPs whilst on elective? ............................ 6
What are the consequences of not adhering to the EPP Policy? ................................. 6
What is an Exposure Prone Procedure (EPP)?

The Department of Health defines Exposure Prone Procedures (EPPs) as ‘invasive procedures where there is a risk that injury to the worker may result in the exposure of the patient’s open tissues to the blood of the worker. These include procedures where the worker’s gloved hands may be in contact with sharp instruments, needle tips or sharp tissues (e.g. spicules of bone or teeth) inside a patient’s open body cavity, wound or confined anatomical space where the hands may not be completely visible at all times’\(^1\). Procedures where the hands and fingertips of the worker are visible and outside the patient’s body at all times, and internal examinations or procedures that do not involve possible injury to the worker’s gloved hands from sharp instruments and/or tissues, are considered not to be exposure-prone, provided that routine infection-control procedures are adhered to at all times\(^1\).

Who is allowed to carry out EPPs?

There is a low risk of blood-borne virus (BBV) transmission during EPPs\(^1\). Healthcare workers who are known to be infectious carriers of HIV, Hepatitis B and Hepatitis C are not allowed to carry out EPPs, as injury to the worker could result in their blood contaminating the patient’s open tissues\(^2\). Department of Health guidance states that all new health care workers must undergo health clearance, including screening for BBVs for those performing EPPs. This is not to prevent those infected with BBVs from working in the NHS, but rather to restrict them from working in those clinical areas where their infection may pose a risk to patients in their care\(^1\). Medical students are classified as healthcare workers in the context of EPPs and this policy.
Are medical students allowed to perform EPPs?

Updated guidance from the GMC states that the performance of EPPs is not a requirement for students completing a medical degree that is acceptable for gaining provisional medical registration\(^2\). However, while not a mandatory part of undergraduate medical education, the Medical School believes that undertaking EPPs can form an important part of medical training and that students should be offered the opportunity to be involved in EPPs, if they wish.

All students will be offered EPP screening prior to commencing their clinical placements. Subsequently, any student who has been screened by the University Occupational Health provider and been given EPP clearance (i.e. gained negative results on screening for Hepatitis B, Hepatitis C and HIV) may undertake EPPs. Students who opt out of this enhanced screening, or who do not meet EPP clearance requirements, will be classified as having standard health clearance and must not be involved in EPPs.

EPP clearance and standard clearance

All students will have standard occupational health clearance on entry to the course. Enhanced EPP clearance will be offered to all students prior to starting the clinical phase (CP) of the course by the University Occupational Health provider.

It is every student’s responsibility to be aware of their level of clearance i.e. standard or EPP throughout CP1, CP2 and CP3. All students will be asked to sign a declaration, to state that they are aware:

1) of what procedures are classed as EPP in accordance with the EPP policy
2) that it is their responsibility to know their EPP clearance status during the clinical phases
3) that until they have completed all vaccination programmes required for EPP clearance they must not be involved in EPP
4) that if they believe their clearance has changed throughout the course it is their responsibility to immediately contact Occupational Health
5) that being involved in EPP without appropriate clearance is a serious professionalism issue

Students may be screened for EPP clearance before completing all vaccination programmes, but will not receive full EPP clearance until all required vaccination programmes have been completed to a satisfactory level.

Please also note that a student’s EPP clearance status is confidential health information. As such students are not required to disclose this information to anyone, but failure to disclose their EPP clearance status when asked to do so by an authorised trust representative in a confidential setting will result in an assumption of standard occupational health clearance only and will exclude the student from performing any EPP.

**What procedures are classed as exposure prone?**

Table 1 outlines a traffic light system offering guidance of practical procedure examples classified as: exposure prone, might be exposure prone and not exposure prone. It must be emphasised that working practices vary between hospitals and healthcare workers. This list is not exhaustive and must be interpreted with some caution. Please note that these are only examples and do not negate the need for further risk assessments. All open surgical procedures are considered as exposure prone. In view of this students without enhanced EPP clearance are not allowed to assist during these procedures. Students are allowed to learn how to “scrub up” for an open surgical procedure, but must not assist in the actual procedure.
Students are advised not to carry out a practical procedure if they are in doubt as to whether it constitutes an EPP or not. Clinical Educators in all trusts have been made aware of this policy. Students will receive the full support of the Medical School for declining to carry out a procedure where there is doubt of it being exposure prone. Students are advised to notify such issues to their Clinical Supervisors or Clinical Sub-Deans responsible for overseeing their attachment.

Are medical students allowed to carry out EPPs whilst on elective?

The restrictions applied to EPPs also apply to students on elective placements regardless of the country that the elective takes place in. Hence medical students without EPP clearance are not allowed to perform EPPs whilst on their electives. All students applying for electives are advised to inform their elective supervisors of the Medical School’s policy. This policy document can easily be downloaded and sent to supervisors.

What are the consequences of not adhering to the EPP Policy?

Failure to adhere to the EPP policy restrictions has potential patient safety implications and will constitute a serious breach of professionalism. This may result in Fitness to Practice procedures being initiated. Students are reminded of their professional obligations to inform Occupational Health if they may have been exposed to a risk of contracting a BBV and, based on an individual risk assessment, further testing may be required.
References


2) Guidance from the Medical Schools Council, the Dental Schools Council, Public Health England, Health Protection Scotland, the Association of UK University Hospitals, and Higher Education Occupational Practitioners. Medical and dental students: Health clearance for Hepatitis B, Hepatitis C, HIV and Tuberculosis


This policy is available to view and download from Moodle.