

Interim guidance – workforce risk assessment in primary eye care

1. Background

Employers and self-employed people must assess the health and safety risks at work.¹ This includes an assessment of risk related to Covid-19 infection. Some people are more at risk of contracting and experiencing adverse outcomes of Covid-19 than others and it is important to perform a workforce risk assessment in addition to your workplace risk assessment.

This interim guidance note is based on the evidence of workforce risk available at the time of publication and will be reviewed and updated as more evidence becomes available.

For employers

This guidance is designed to supplement existing [Covid-19 guidance](#). It provides additional background information on performing a workforce risk assessment, drawing on pan UK guidance from the four UK governments, NHS departments and occupational health.²

This guidance is intended to support your workplace assessment and infection prevention and control (IPC) measures. For example, the following practice level risk management strategies will help reduce risk for all staff, patients and visitors while at the practice:

- all staff should self-screen for Covid-19 each day before leaving for work
- all staff should follow and comply with IPC measures, including standard precautions and the correct use of PPE
- people with a suspected or confirmed case of Covid-19 should not be seen in primary eye care settings – e.g. by triaging patients according to local protocols and directing them to appropriate local services
- the latest guidance on performing aerosol generating procedures (AGPs) in primary eye care settings should be followed.³

These and other safe systems measures help reduce the risk of virus transmission for all groups, but you will also need to keep up to date with the emerging evidence for at risk groups and assess whether additional adjustments are required for individual staff members.

For practice owners, directors and self-employed practitioners

If you are a practice owner, director or self-employed, you should undertake a self-assessment. If you work in multiple settings, consider whether the risk you are exposed to varies as you may need to repeat your self-assessment accordingly. Your workplace will also have a risk assessment and you should support and comply with local policies to help reduce the risk of virus transmission.

For employees

This guidance provides information on workforce risk assessments during the Covid-19 pandemic and highlights what you should expect your employer to do – i.e. both to assess and manage risk generally and for you as an individual. Employers can perform risk assessments in different ways. In this guidance we suggest all employees are offered a risk assessment. You may find that undertaking a self-assessment of your risk first is a helpful preparation for discussions with your employer.

2. Workforce risk assessment

The Faculty of Occupational Medicine (FOM) advises employers to perform a workforce assessment, so that you can “identify those individuals with potentially increased vulnerability to infection or adverse outcomes from Covid-19”. FOM lists five main factors to consider:

Factor	Important notes
Age	People aged 70 and older (including those without medical conditions) are regarded as ‘clinically vulnerable’ and at greater risk. Public Health England (PHE) for example reports that people aged 80 or older as being seventy times more likely to die than those under 40. ⁴
Sex	Males are disproportionately affected. For example, PHE found that males make up a larger proportion of Covid-19 deaths. ⁵
Health conditions	Individuals included in official clinically vulnerable or clinically extremely vulnerable lists based on their underlying health condition are at greater risk. ⁶
Ethnicity	Evidence suggests that that people of from Black, Asian and Minority Ethnic (BAME) backgrounds have been disproportionately affected by Covid-19. ⁷ PHE found that controlling for the effect of sex, age, deprivation and region BAME people were at greater risk if they develop Covid-19, although the analysis has not yet accounted for other important variables such as occupation, comorbidities or obesity. ⁸ FOM also notes that individuals with co-morbidities are presenting with adverse outcomes at a younger age. ⁹ The BBC has provided a summary of our current understanding as of 10 June .
Pregnancy	If over 28 weeks pregnant the recommendation is to stay at home. Other risk factors should also be considered, including health conditions, ethnicity etc.

Table 1: Summary of individual risk factors, adapted from FOM, Risk Reduction Framework for NHS Staff at risk of Covid-19 infection¹⁰, with additional detail on specific groups as referenced.

The reasons why these factors increase risk are not yet fully understood, however the impact of Covid-19 may replicate existing health inequalities and, in some cases, exacerbate them further, particularly for BAME groups¹¹.

It is important to remember that local risk assessments do not replace official guidance about clinically extremely vulnerable and vulnerable groups to Covid-19 and how to adapt working arrangements for these groups. For example, this includes but is not limited to:

- clinically extremely vulnerable individuals should not work outside the home at this stage of the pandemic¹²
- at this stage of the pandemic clinically vulnerable individuals should be helped to work from home, either in their current role or in an alternative role or otherwise prioritised for jobs where they can maintain social distancing¹³
- Royal College of Obstetricians and Gynaecologists [guidance for employers and pregnant women during the Covid-19 pandemic](#).ⁱ

Although official lists of at-risk groups include health conditions, age and pregnancy, they do not cover sex or ethnicity. You should ensure you are up-to-date with emerging evidence on these risk factors from reliable sources, such as the FOM, and adapt your risk assessment as needed. This guidance note will be updated when significant new evidence becomes available on both risk factors and risk management.

In all cases it is important to respect an individual's confidentiality and not to make any assumptions based on appearance, partial information, history or a protected characteristic.

ⁱ Access the latest version here <https://www.rcog.org.uk/coronavirus-pregnancy>

For example, from an employment law perspective it is important to ensure that no one is treated less favourably on grounds of their race or that a provision, criterion or practice is not put in place which puts those in this group at a disadvantage. The shared goal here is to protect staff, so this should not become an issue. It is nevertheless important to encourage open feedback to ensure measures put in place to protect staff have the optimal affect and do not inadvertently disadvantage anybody based on a protected characteristic.

Conducting a risk assessment

Although it can be difficult to engage in conversations about known and potential Covid-19 risks, it is important for employers to reduce barriers to raising and sharing concerns, especially linked to protected characteristics, and to make time for sensitive and responsive conversations.

At the same time, a balance does need to be struck, so that members of staff are not required to discuss any health or other conditions they choose not to discuss. If a staff member does not want to discuss their health condition they should not be forced to.

The goal is always to work collaboratively and openly so you can perform an effective risk assessment and make any necessary adjustments.

Finally, when making these assessments, you need to comply with your wider duties to those with protected characteristics. You can do this by asking all employees to review and complete a risk assessment form (see Section 4).

3. Actions to take following a risk assessment

During the pandemic, a workplace risk assessment should result in implementing rigorous infection prevention and control (IPC) measures, including the correct use of PPE and social distancing, for **all** employees in primary eye care settings. The College of Optometrists advises that where appropriate PPE is not available, face-to-face care within 2m should be postponed or patients should be signposted as clinically necessary to an alternative provider with appropriate PPE.

Other risk reduction measures for all employees should include, but is not limited to:

- Limiting the duration of close interaction with patients by only conducting clinically necessary tests and examinations.
- Asking that the patient attends any face to face consultation unaccompanied where possible.

This means that, following an individual risk assessment you might find that no additional precautions are necessary. Where individuals are at greater risk, you might introduce further risk reduction measures, such as:

1. Redeploying staff at very high risk to activities that require less face to face contact with patients, for example:
 - i. Prioritising telemedicine and triage clinics for clinicians at very high risk.
 - ii. Encouraging remote working where possible.
2. Enabling staff at high risk to avoid the busiest times on public transport through adjustments to work hours.
3. Providing or signposting to additional support on topics such as wellbeing, chaplaincy/faith advice and counselling, as well as practical help where possible.

Workforce risk assessments should be reviewed whenever there are any significant changes, such as new guidance on at risk groups, work equipment, work activities, or a change in an individual's personal circumstances.

We also recommend that you keep a record of the risk assessment and include example templates in Section 4 to support this. As the risk assessment includes reference to workers' health conditions, it should be treated as sensitive information under data protection legislation (including GDPR) and managed appropriately.

All team members should be encouraged to inform their employer (such as their occupational health team or manager) if there are any changes to their health or circumstances that may affect the risk assessment.

4. Risk assessment templates

An example risk assessment template is included in Appendix 1. This is based on existing official extremely clinically vulnerable and clinically vulnerable criteria in the UK, but also includes other factors that might be considered. The template will be updated if official recommendations change. The template does not include a risk scoring mechanism as there is currently no robust, validated and peer-reviewed scoring mechanism for Covid-19 riskⁱⁱ.

Appendix 2 includes links to other risk assessment tools that have been developed for various health and social care professions and risk assessment resources.

5. Covid-19 guidance

You should read this workforce risk assessment alongside Covid-19 guidance from your representative and professional bodies. We appreciate that implementing these measures might involve complex employment law and health and safety considerations. If you need additional support and advice:

FODO members can email hr@fodo.com or call 01244 688422.

College members can contact Clinical Advisors at adviser@college-optometrists.org.

AOP members can email employment@aop.org.uk

ABOD members can email general@abdo.org.uk

6. Share feedback on this guidance

The goal of this tool is to help assess risk and protect staff. If you have feedback on this interim guidance note or the template risk assessment tool in Appendix 1, please share it with us by [leaving feedback here](#).

ⁱⁱ Employers and employees might be interested in an [objective scoring model that has been developed and submitted for peer-review](#). Although still pending peer-review, it provides a suggested objective risk stratification tool for people not already on official clinically vulnerable and extremely vulnerable lists in the UK.

Appendix 1: Confidential Covid-19 Personnel Risk Assessment

The Management of Health and Safety at Work Regulations 1999 require employers to carry out a risk assessment to assess your work and working environment so that you are not placed at risk at work including during the coronavirus pandemic.

Your co-operation in completing this form is appreciated. The form is for health and safety purposes only. The information will be treated as confidential and used to ensure that any potential hazards to which you are exposed are evaluated and managed.

Information taken from the latest UK wide government guidance as of 6 July 2020¹⁴.

Name:	
Position:	
Location:	

Coronavirus (Covid-19) can make anyone seriously ill. But for some people, the risk is higher. This table is designed to help us better understand your individual risk so that we can work with you to find ways to manage any risk while at work.

Do any of the following apply?	Action taken for risk reduction/elimination	
	Please tick all that apply	Details if applicable
<p>1. Clinically extremely vulnerable</p> <p>You will be considered 'clinically extremely vulnerable' (and therefore classed as being in the 'high risk' group) if you have one of the following medical conditions:</p> <ul style="list-style-type: none"> • Solid organ transplant recipient; • Are having chemotherapy • Are having immunotherapy or other continuing antibody treatment for cancer, • Are having an intense course of radical radiotherapy for lung cancer; • Are having targeted cancer treatments that can affect the immune system (such as protein kinase inhibitors or PARP inhibitors) at any stage of treatment; • Have blood or bone marrow cancer (such as leukaemia, lymphoma or myeloma) regardless of which stage of treatment; 	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<p>If you are at high risk from Covid-19, you are advised to take extra steps to protect yourself. At this stage of the pandemic this includes not leaving your home for any reason ('shielding'). Official advice is being updated however as we progress through the pandemic and might therefore vary based on where you live and work in the UK.</p> <p>Keep up to date with local Covid-19: guidance on shielding and protecting people defined on medical grounds as extremely vulnerable:</p> <ul style="list-style-type: none"> • England • NI • Scotland • Wales

<ul style="list-style-type: none"> • A weakened immune system as the result of conditions such as HIV and AIDS, or medicines such as steroid tablets or chemotherapy; and/or • You are seriously overweight (a body mass index (BMI) of 40 or above). 	<input type="checkbox"/>	
3. Are you pregnant?	<input type="checkbox"/>	If yes, complete a new and expectant mothers risk assessment.
4. Other conditions you believe to make you vulnerable: Do you believe your sex at birth, ethnicity, general health or other factors put you or others at an increased risk at work during the pandemic.	<input type="checkbox"/>	Research suggests males and people from BAME backgrounds are at greater risk of harms from Covid-19. The IPC measures in primary eye care settings are likely to be sufficient mitigating factors if there are no underlying health conditions or the employee is not pregnant as set out in sections 1 to 3 of this

Line/practice manager:	No further actions are deemed necessary.	<input type="checkbox"/>
	Both line/practice manager and the employee are satisfied with the control measures currently in place.	<input type="checkbox"/>
	The risk is not acceptable and further control measures have been implemented to reduce the risk.	<input type="checkbox"/>

Notes:	Click or tap here to enter text.
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Employee signed:	Date: Click or tap to enter a date.
Line manager signed:	Date: Click or tap to enter a date.

Updates:	Click or tap to enter a date.	Click or tap here to enter text.
	Click or tap to enter a date.	Click or tap here to enter text.

Appendix 2: Risk assessment tools and resources

The British Medical Association (BMA) has now endorsed this [Covid-19 risk assessment tool](#) which includes a self-scoring assessment tool.¹⁵

Faculty of Occupational Medicine [Risk Reduction Framework for NHS staff at risk of COVID-19 infection.](#)

[All Wales COVID-19 Workforce Risk Assessment Tool \[https://gov.wales/written-statement-all-wales-covid-19-workforce-risk-assessment-tool\]](#). The tool is a work in progress and will be improved and developed based on feedback from employers and employees using it.

RCN Position on Employer Responsibilities for BAME staff: <https://www.rcn.org.uk/covid-19/rcn-position/bame-staff-employer-responsibilities>

NHS Employers guidance: <https://www.nhsemployers.org/covid19/health-safety-and-wellbeing/risk-assessments-for-staff>

NHS trade unions principles for risk assessment: <https://www.nhsemployers.org/-/media/Employers/Documents/COVID19/NHS-Trade-union-principles-on-health-and-safety-risk-assessment-and-vulnerable-workers.pdf?la=en&hash=368CC229252B4C7F736DB2B5F21611B62931E2F6>

Royal College of Psychiatrists COVID-19 Guidance on risk mitigation for BAME staff in mental healthcare settings: <https://www.rcpsych.ac.uk/about-us/responding-to-covid-19/responding-to-covid-19-guidance-for-clinicians/risk-mitigation-for-bame-staff>

Guys & St Thomas' resources

- Guidance for line managers on risk assessments: <https://www.guysandstthomas.nhs.uk/resources/coronavirus/occupational-health/risk-assessment-extended-manager-guide.pdf>
- Risk Matrix: <https://www.nhsemployers.org/-/media/Employers/Documents/COVID19/Guys-and-St-Thomas-Risk-Assessment-Matrix-Covid19.docx?la=en&hash=8AB807F81681D394B2CEB1FABACDD814B810D9A7>
- Guidance for managers: <https://www.guysandstthomas.nhs.uk/resources/coronavirus/occupational-health/managers-guidance-risk-assessment.pdf>

In addition, the Health and Safety Executive has information about managing risks and risk assessment at work, which includes templates <https://www.hse.gov.uk/simple-health-safety/risk/index.htm>.

References

- ¹ Regulation 3 of the Management of Health and Safety and Work regulations 1999
- ² NHS Scotland and Scottish Government, Interim Guidance for health and social care employers on staff from Black, Asian and Minority Ethnic Backgrounds <https://www.staffgovernance.scot.nhs.uk/coronavirus-covid-19/other/>; Public Health Agency Northern Ireland, <https://www.publichealth.hscni.net/sites/default/files/2020-05/Protecting%20BAME%20colleagues.pdf>; NHS Employers, Risk assessments for staff <https://www.nhsemployers.org/covid19/health-safety-and-wellbeing/risk-assessments-for-staff>; Faculty of Occupational Medicine, Risk Reduction Framework for NHS Staff at risk of COVID-19 infection <http://www.fom.ac.uk/wp-content/uploads/Risk-Reduction-Framework-for-NHS-staff-at-risk-of-COVID-19-infection-12-05-20.pdf> accessed 13 June 2020
- ³ College of Optometrists, Optometric primary eye care during the COVID-19 pandemic, recovery table. Clinical tests <https://www.college-optometrists.org/uploads/assets/467d55b0-3c4c-41b4-9d708b627c122ffa/dab1e074-d76e-44f0-8a6c5bda30b0d2e5/COVID-19-traffic-light-guidance-table.pdf>
- ⁴ Public Health England, COVID-19: review of disparities in risks and outcomes, COVID-19: review of disparities in risks and outcomes <https://www.gov.uk/government/publications/covid-19-review-of-disparities-in-risks-and-outcomes>, accessed 10 June 2020
- ⁵ Public Health England, COVID-19: review of disparities in risks and outcomes, COVID-19: review of disparities in risks and outcomes <https://www.gov.uk/government/publications/covid-19-review-of-disparities-in-risks-and-outcomes>, accessed 10 June 2020
- ⁶ Each UK country lists these groups separately, you should keep up to date with local lists England - [clinically vulnerable](#) and [clinically extremely vulnerable](#) Northern Ireland - [vulnerable](#) and [clinically extremely vulnerable](#) Scotland - [higher risk of severe illness and extremely high risk of severe illness](#) Wales - [people at increased risk](#) and [people extremely vulnerable](#)
- ⁷ NHS Scotland and Scottish Government, Interim Guidance for health and social care employers on staff from Black, Asian and Minority Ethnic Backgrounds <https://www.staffgovernance.scot.nhs.uk/coronavirus-covid-19/other/>; Public Health Agency Northern Ireland, <https://www.publichealth.hscni.net/sites/default/files/2020-05/Protecting%20BAME%20colleagues.pdf>; NHS Employers, Risk assessments for staff <https://www.nhsemployers.org/covid19/health-safety-and-wellbeing/risk-assessments-for-staff>; Faculty of Occupational Medicine, Risk Reduction Framework for NHS Staff at risk of COVID-19 infection <http://www.fom.ac.uk/wp-content/uploads/Risk-Reduction-Framework-for-NHS-staff-at-risk-of-COVID-19-infection-12-05-20.pdf> accessed 13 June 2020
- ⁸ Public Health England, COVID-19: review of disparities in risks and outcomes, COVID-19: review of disparities in risks and outcomes <https://www.gov.uk/government/publications/covid-19-review-of-disparities-in-risks-and-outcomes>, accessed 10 June 2020
- ⁹ Faculty of Occupational Medicine, Risk Reduction Framework for NHS Staff at risk of COVID-19 infection <http://www.fom.ac.uk/wp-content/uploads/Risk-Reduction-Framework-for-NHS-staff-at-risk-of-COVID-19-infection-12-05-20.pdf> accessed 13 June 2020
- ¹⁰ Faculty of Occupational Medicine, Risk Reduction Framework for NHS Staff at risk of COVID-19 infection <http://www.fom.ac.uk/wp-content/uploads/Risk-Reduction-Framework-for-NHS-staff-at-risk-of-COVID-19-infection-12-05-20.pdf> accessed 13 June 2020
- ¹¹ Member briefing: Public Health England review on disparities in the risk and outcomes of COVID-19, NHS Confederation, June 2020 <https://www.nhsconfed.org/resources/2020/06/phe-review-disparities-in-risk-and-outcomes-of-covid19>
- ¹² HM Government, 2.1 Protecting people who are at higher risk

“Clinically extremely vulnerable individuals have been strongly advised not to work outside the home.” <https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/shops-and-branches#shops-2-1>

¹³ HM Government, 2.1 Protecting people who are at higher risk

“Clinically vulnerable individuals, who are at higher risk of severe illness (for example, people with some pre-existing conditions), have been asked to take extra care in observing social distancing and should be helped to work from home, either in their current role or in an alternative role.” <https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/shops-and-branches#shops-2-1>

¹⁴ <https://www.gov.uk/government/publications/staying-alert-and-safe-social-distancing/staying-alert-and-safe-social-distancing-after-4-july#clinically-vulnerable-people>
<https://www.nidirect.gov.uk/articles/coronavirus-covid-19-advice-vulnerable-people#toc-0>
<https://www.nhsinform.scot/illnesses-and-conditions/infections-and-poisoning/coronavirus-covid-19/coronavirus-covid-19-physical-distancing>
<https://gov.wales/coronavirus-social-distancing-guidance#section-38138>
<https://www.gov.uk/government/publications/staying-alert-and-safe-social-distancing/staying-alert-and-safe-social-distancing-after-4-july#clinically-vulnerable-people>
<https://www.nidirect.gov.uk/articles/coronavirus-covid-19-advice-vulnerable-people#toc-0>

¹⁵ BMA, Covid-19 risk assessment. <https://www.bma.org.uk/advice-and-support/covid-19/your-health/covid-19-risk-assessment> accessed 6 July 2020