A Risk Assessment Tool



REDUCING THE RISK OF COVID-19 IN THE COMMUNITY PHARMACY

June 2020

www.the-pda.org





About the PDA

The Pharmacists' Defence Association (PDA) is a not-for profit defence association and trade union for pharmacists. It is the only organisation that exclusively looks after the interests of employee and locum pharmacists across all sectors of pharmacy, currently with a membership of more than 31,000, the PDA is the largest representative membership body for pharmacists in the UK and this membership continues to grow. Delivering more than 5,000 episodes of support provided to members who have found themselves in a critical incident situation in the last year alone, provides the PDA with a rich vein of up to date experiences which inform policy and future strategy. This experience has recently been informed by the very considerable number of Covid-19 related issues being faced by members. The practical experience gained in supporting members at the coal face is further enhanced by regular member surveys and focus group interactions. The proposals put in this document are largely built upon this experience and the lessons that emerge.

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Covid-19 and Community Pharmacy

2. Risk Assessment Tool and Managing the risk:

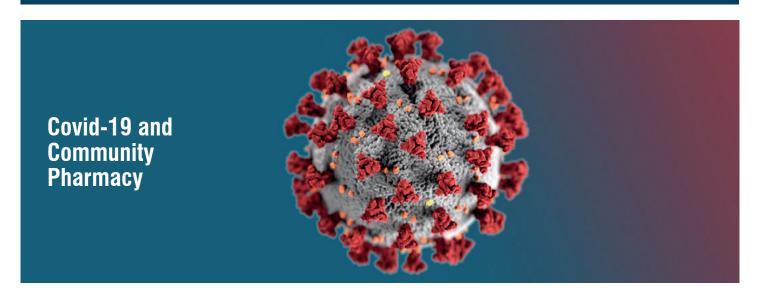
Guidance and forms to support identification and assessment of the risks within the pharmacy. A practical guide to risk reduction following assessment.

3. Background reading

Providing those undertaking any assessments with helpful background.



1. THE CONTEXT



Covid-19 is an exceptional circumstance; a global pandemic which poses a risk which has altered the way that all people live and work. The likelihood is that many of these alterations in lifestyle and especially those seen in the workplace will be permanent and they will affect different sectors of society in different ways. and especially within premises that provide healthcare.

Because those feeling unwell will require the support of healthcare professions, this puts healthcare staff into a much riskier working environment. These additional risks will affect every member of staff that works in, or patient that visits, a healthcare premises. Experience gained as society has moved through the crisis has shown that frontline healthcare workers, by the very nature of their activity and their workplace, have borne a disproportionate burden of the risk of acquiring Covid-19.

Similarly, evidence from hospitals has shown that up to a fifth of patients with Covid-19 in several hospitals contracted the disease over the course of the pandemic while already being treated there for another illness.¹

Many other experiences indicate that the impact of Covid-19 is complex. Groups within society, such as those with existing underlying conditions, the elderly and those from Black, Asian and minority ethnic (BAME) backgrounds are particularly at risk. The BAME issue is particularly relevant to pharmacy as 43% of pharmacists come from a BAME background². It is apposite to note that of the four pharmacists who at the time of producing this risk management tool, have tragically lost their lives to this virus, all of them came from BAME backgrounds.

A virus is unlike most of the health and safety risks in the workplace. It does not discriminate and can be passed in either direction between employee to a member of the public, or between employees, or even by touching a contaminated surface.

Pharmacies are NHS facilities which are paid from the public purse. The public rightly expects that all staff and the public itself are adequately protected from acquiring or transmitting Covid-19 within a healthcare facility. One of the lessons learned during the crisis, is that there has been a population shift away from other parts of the healthcare system, such as GP practices and A&E departments and into community pharmacies who have seen a significant increase in the numbers attending. This means that the need to concentrate on reducing the risks of Covid-19 are even greater in a community pharmacy than might be seen in these other parts of the system.

To instil confidence in both the staff who work in a pharmacy and the public who frequent it, employers MUST have in place processes that reduce the risk of Covid-19. For this to be achieved, each pharmacy must first be risk assessed to establish the current position, it then becomes possible to establish measures that reduce the risks in the workplace that may underpin the confidence that the public expect.



Status of this Document:

This risk management tool has been produced for the purposes of being used as part of an overall risk assessment of pharmacies required of employers and is specifically designed to minimise the risks generated by Covid-19.

This document recognises two important factors;

- 1. That the people best placed to identify the risks are those physically working in the pharmacy, those who fully appreciate the circumstances in the workplace.
- That the Responsible Pharmacist is responsible for the safe and effective operation of the pharmacy and therefore has an important role to play in undertaking the assessment and establishing the appropriate risk management regime and then raising any concerns on safety with their employer.

It is recommended that those individuals who will be involved either in undertaking any assessments, or those who are charged with the task of ensuring that an employer's legal responsibility can be properly discharged should familiarise themselves with **Section 3** of this document as this helps to identify good practice in relation to infection control. It also identifies good ideas that have already been applied in the community pharmacy setting. In particular, the British Standards Institution Report entitled 'Safe working during the Covid-19 pandemic – general guidelines for organisations'



(May 2020) provides a powerful backdrop to this community pharmacy initiative.

This PDA initiative will enable pharmacy employers and Responsible Pharmacists to;

- 1. Identify risks from Covid-19 for both employees and members of the public in a community pharmacy setting using a framework.
- 2. Understand what needs to be done to reduce the risks.
- 3. Demonstrate that a systematic approach is being taken to address the risks.
- 4. Put in place a transparent mechanism and action plan that allows issues of concern to be raised with the employers.

This document **DOES NOT** abrogate the legal duty of employers to ensure that both a risk assessment is undertaken and that appropriate risk mitigating measures are put in place, but it does help employers to satisfy that legal duty.

THE POLICY OF THE PDA

A summary...

The PDA will work towards securing:

- 1. A firm commitment from all pharmacy owners to implement measures to protect staff, locums and members of the public and others entering a pharmacy by introducing measures to minimise the risk of coronavirus transmission.
- 2. A commitment from every pharmacy owner to comply with the requirement to undertake a risk assessment at individual, premises and pharmacy team level.
- 3. Measures appropriate to the situation, as identified by a risk assessment, are implemented to reduce the risks of transmission of Coronavirus.



- 4. For funding for safety measures from the government to assist pharmacy contractors with their implementation.
- 5. Regulatory standards to be enforced on pharmacy owners, superintendents, chief pharmacists and line-managers to ensure a safe working environment.

The Legal Position

Health and safety legislation places a legal duty on employers to ensure safety in the workplace.

"Health and safety law places duties on organisations and employers, and directors can be personally liable when these duties are breached: members of the board have both collective and individual responsibility for health and safety."

Workers, both employed and self-employed locums, have a duty to take care of their own health and safety and that of others who may be affected by their actions at work. Workers must work with employers and co-workers to support the legal requirements. However, in reality, it will be the employer who controls the resources who will be in a position to ensure that all reasonable measures are put in place so that their employees work in a healthy and safe environment and that their welfare is considered in any work activity.

Under health and safety legislation, employers have an obligation to ensure that any potential risk from disease or infection is eliminated or controlled. Under public liability arrangements pharmacy owners have an obligation to similarly protect members of the public and others coming into the pharmacy.

Employers are required to undertake a risk assessment to protect employees from exposure to hazards including biological



hazards such as Covid-19. Such a risk assessment should always involve employees and it is they who may bring any findings from such a risk assessment or issues that they are concerned about to the attention of the employer. Based on the risk assessment, the employer must then decide whether there is enough protection for employees. Employers must then generate a clearly defined statement on any potential risks, this statement must also spell out what action it proposes to take to reduce any inherent risks.

Under health and safety regulations, employers must also recognise either a union representative or any member of staff elected by fellow work colleagues to make representations to the employer on matters affecting the health and safety of those present.

Employers also have a legal duty under RIDDOR regulations (the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013) to make a formal report to the Incident Contact Centre if any of their staff contract Covid-19 which results in death, serious illness or absence from work for seven days or more and which could reasonably have been contracted whilst at work.

The Professional and Regulatory Position

Over and above the legal requirements, there are several regulatory requirements.

The GPhC Standards for owners of pharmacy premises, Standard 3 states:

"The environment and condition of the premises from which pharmacy services are provided, and any associated premises, safeguard the health, safety and wellbeing of patients and the public."



Standard 2.3 states:

"Staff can comply with their own professional and legal obligations and are empowered to exercise their professional judgement in the interests of patients and the public"

Failure to observe the requirements of health and safety legislation could not only cause harm but would also be a breach of pharmacy regulatory standards.

THE POSITION OF THE PDA

The philosophy behind the health and safety legislation recognises that both employees and employers will have a role in ensuring that a safe working environment exists.



Operationally however, the majority of the physical and process changes that may be required to reduce the risks of infection transmission can only be made with the approval of the employers as it is they and not the employees or locums who control the financial resources. The thrust of the responsibility thus falls on the shoulders of the employer.

PDA members have provided many examples that demonstrate the unhelpful tension that often exists between employers and employees around safety during this pandemic. Examples include pharmacists being given direct instructions not to wear PPE irrespective of any judgement made or concerns expressed by the Responsible Pharmacist or team members. This places not only

staff, but also members of the public at risk. In some instances, where concerns about safety have been raised by locums acting in their RP capacity, they are told that they will not be re-booked.

Failure by an employer to put in place measures for risk reduction could lead to harm to employees, members of the public and others entering the pharmacy.

Case law shows that the penalties for employers who disregard the concerns of their employees are extremely severe. In the event that an employee is harmed and for example becomes infected at work, particularly in circumstances where it can be shown that the employee's prior concerns have been ignored by an employer, then the employer becomes significantly more liable.

In a landmark case (Simmons vs British Steel PLC, House of Lords, April 29th, 2004) where an employer refused to act on the concerns of an employee about safety issues, the employee sustained an injury and psychological trauma. The employee was awarded nearly £500,000 in compensation. This case has clear implications for pharmacy employers.

THE POLICY OF THE PDA ON REDUCING THE RISK FROM COVID-19 IN COMMUNITY PHARMACY

The PDA will seek to ensure;

1. A firm commitment from all pharmacy owners to implement measures to protect staff, patients and customers by introducing measures to minimise the risk of coronavirus transmission.

The PDA will work with pharmacy bodies, relevant external organisations, with pharmacy employers and members to encourage a proactive and committed approach to implementing these safety enhancing measures. The PDA will lobby the Governments of each of the four UK nations to ensure that there is a focus upon safety in pharmacies.





In the event that a PDA member contracts Covid-19 and it can be shown that risk management suggestions made by employees have been disregarded by the employer and there is evidence to show that this caused the individual to contract Covid-19, then the PDA will robustly pursue the employer on behalf of the member. The PDA will seek a prosecution under health and safety legislation, compensation for the member through civil action and referral of the employer to the regulator for disciplinary action for a breach of regulatory standards.

2. A requirement for every pharmacy owner to undertake a risk assessment at individual, premises and pharmacy team level.

Building upon the foundations of legislation, professional codes and available research, it is evident that in order to comply with these requirements, risk assessments of each pharmacy must be undertaken and a corresponding clearly-defined statement on the potential infection risks would need to be produced and made available in the pharmacy.

The PDA will not only encourage employees and employers to undertake a risk assessment, it has produced and made available a risk assessment tool specific to pharmacy which enables such a risk assessment to be undertaken.

The risk assessment is a living document that will need to be reviewed frequently especially as the situation on Covid-19 evolves.

The risk assessment tool will enable both employees and employers to:

- · Identify the risks.
- Consider whether any of the activities undertaken in the pharmacy may increase the risk of infection e.g. the use of consultation rooms, use of shared pens, acceptance of cash and paper money, allowing large numbers of the public to occupy the premises simultaneously.
- Consider whether any modifiable physical aspects of the pharmacy increase the risk of infection e.g. cramped dispensaries, narrow aisles, clutter.
- Identify any employees at higher risk. It will help to identify the most vulnerable members of staff and
- aid the development of a specific policy on protecting them.



are adequate or should be improved.

Consider the findings of the risk assessment and instigate staff consultation to establish whether existing precautions



- Record measures that have been taken to reduce infection risk in the workplace. This record must be communicated to all members of staff and should be made available for inspection on the pharmacy premises.
- Periodically review the findings of the risk assessment. The policy should be amended in light of any new developments.



3. Measures appropriate to the situation, as identified by a risk assessment, are implemented to reduce the risks of transmission of Covid-19.

An appropriate assessment would identify whether the pharmacy in question is in a low, medium or high-risk category and in particular, enables the staff to identify specific areas of activity that may need attention.

Consequently, it will be possible to identify and implement measures which are most appropriate to the situation. The PDA risk assessment tool contains lists of measures which may be used in response to an adverse risk assessment. By making this tool available, the PDA aims to engage the Responsible Pharmacists in the pharmacy in helping to establish safer working environments and to encourage employers to focus on the issues of infection control and to employ the necessary risk management measures.

Managing the Risks.

The factors that can have a great influence on the levels of infection risk in the pharmacy will broadly fall into five categories. By analysing each category, it is possible to produce a checklist of practical options which may need to be employed to ensure that the risk of transmission of infection can be reduced to a minimum. Broadly, the categories are:

- The design, operation and layout of the pharmacy
- Prevention measures
- Workforce assessments both collective and for individual staff
- Contingency planning in the event of staff being exposed to Covid-19:
- General Infection control measures

4. Funding for safety measures from the government to assist pharmacy contractors with their implementation.

The PDA will bring the need for funding support to the attention of the relevant government bodies in England, Scotland, Wales and Northern Ireland and will also support organisations who negotiate funding







with the government to secure the funds that may be needed to employ any changes required. While we want to work with pharmacy employers and others to secure additional financial support from government, limited resources in no way lessen the obligation for employers to make their workplaces safe in the meantime.



5. Regulatory standards to be enforced on pharmacy owners, superintendents, chief pharmacists and line-managers to ensure a safe working environment.

Regulatory standards make it very clear that pharmacist employers need to ensure the safety of members of the public.

With the unique risk posed by the Coronavirus to both staff and members of the public in a community pharmacy, we urge the UK pharmacy Regulators to ensure that pharmacy owners have in place both the processes that can identify any risks in the first place and the procedures and measures required to minimise the risk of infection for their staff and members of the public that come in to the pharmacy.

The PDA is prepared to work with the UK pharmacy regulators to ensure that this happens.



2. RISK ASSESSMENT TOOL

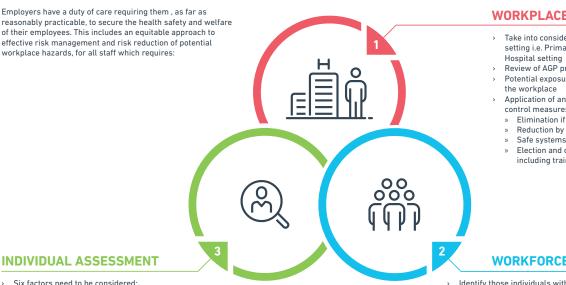
Guidance and forms to support identification, assessment and reducing the risks in community pharmacy

All employers have a duty of care to their staff and also to the customers who enter their pharmacy premises. Additionally employers have a legal responsibility to ensure the Health and Safety of their staff and this means that employers have to ensure that all workplaces (to include staff areas and areas open to members of the public) are safe to occupy and work within. An important component of this responsibility is the need to undertake a workplace risk assessment to establish what risks may be evident. It is clear that that those members of staff at the coal face are much closer to the daily operations and therefore have a much better understanding of not only of the risks, but also on the solutions that may mitigate these risks. Employers should encourage the involvement of employees in assessing the risks of Covid-19 in their pharmacies; this would improve their ability to ensure the Health, Safety and wellbeing at work during the crisis.

The Responsible Pharmacist regulations require the Responsible Pharmacist (RP) to ensure the safe and effective operation of the pharmacy, for this reason, the RP as a clinically qualified healthcare professional familiar with concepts of risk management and infection control, is ideally placed to not only undertake the risk assessment, but also to engage directly with the staff in the pharmacy so as to generate recommendations to the employer on how best to reduce the risks for staff and members of the public who come to the pharmacy.

Assessing and then acting upon the risks of Covid-19, is a process that is already at work in many NHS settings. The NHS risk reduction framework (below) sets out the structured process that should be used to assess the risks and then to minimise them. A good example of a broad NHS risk management framework is the one produced by the Faculty of Occupational Medicine of the Royal College of Physicians. Reproduced below, it sets out the structured process that should be used to assess the risks and then to reduce them.

HOW TO USE THE RISK ASSESSMENT TOOL



WORKPLACE ASSESSMENT

- > Take into consideration health care setting i.e. Primary, Community or
- Review of AGP procedures
- Potential exposure to SARS-CoV-2 in
- Application of an appropriate hierarchy of control measures including:
- Elimination if possible
- Reduction by hygiene measures,
- Safe systems of work
- Election and correct use of PPE including training and fit testing

WORKFORCE ASSESSMENT

- Six factors need to be considered:
- 1. Age: Those aged over 70 have already been identified clinically vulnerable
- 2. Sex
- 3. Clinically vulnerable people: Those with underlying health conditions or co-morbidities
- 4. Ethnicity: Those of BAME appear to be at increased risks, particularly aged above 55 or have co-
- 5. Pregnancy in particular those who are over 28
- weeks or have underlying health conditions

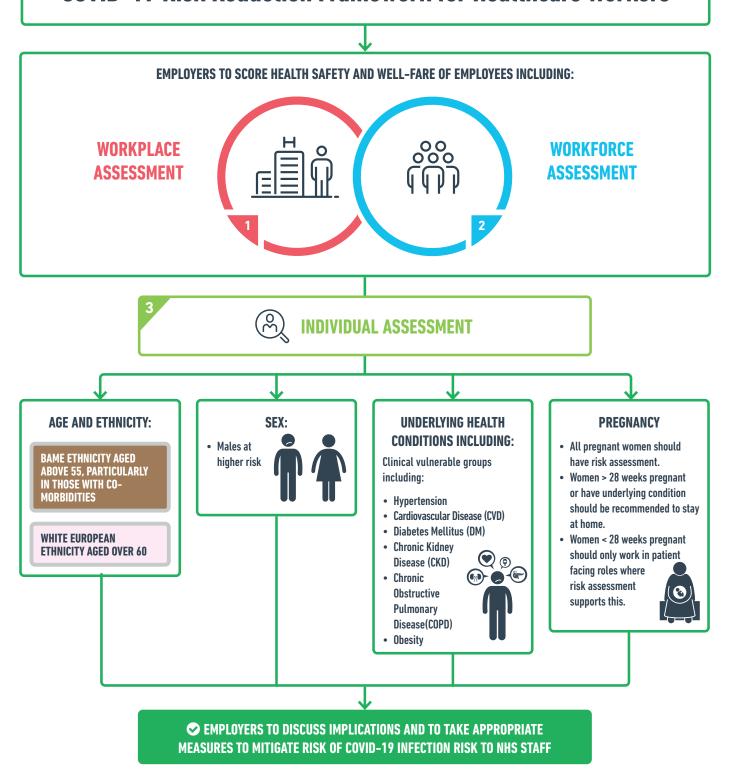
 6. Disabilities identified which may be the subject of reasonable adjustments

- Identify those individuals with increased vulnerability to infection or poorer outcomes from COVID-19
- Guidance has identified three categories of vulnerability:
- Specific long term health conditions
- Older age
- Pregnancy
- Evidence suggests that ethnicity of a BAME background may also be associated with increased vulnerabilitv
- Evidence of Males being at higher risk with UK Data showing approximately 60% of people being admitted to hospital being Male
- Availability of appropriate redeployment options

Source: https://www.fom.ac.uk/wp-content/uploads/Risk-Reduction-Framework-for-NHS-staff-at-risk-of-COVID-19infection-12-05-20.pdf



COVID-19 Risk Reduction Framework for Healthcare Workers



Source: https://www.fom.ac.uk/wp-content/uploads/Risk-Reduction-Framework-for-NHS-staff-at-risk-of-COVID-19-infection-12-05-20.pdf

THE COMMUNITY PHARMACY RISK ASSESSMENT TOOL

The risk assessment tool enclosed has been designed to specifically reflect the risks seen in a community pharmacy setting, whilst it contains many useful ideas on how to identify and then minimise risks, it is recognised that no two pharmacies are the same and therefore each may need a slightly different approach in managing the risks during the pandemic. Furthermore, as well as there being further additional ideas that the staff and /or the RP in the pharmacy may find of greater relevance, the GPhC and the various Pharmacy representative bodies have all produced lists of measures (see **Section 3**)

The intention of this **Community Pharmacy Risk Assessment tool** is so that it can be used by the staff of the pharmacy to kick-start the systematic process of workplace assessment. Those assessing the risk, should tick the red, amber or green column adjacent to the risk described.

In this Assessment, the following convention is used;

- a) 'must' indicates an absolute requirement
- b) 'should' indicates a recommendation
- c) 'may' indicates a permission
- d) 'can' indicates a possibility

Once the assessment is completed, the RP using ideas provided in the '**Reducing the risk**' column (or others, as these are not an exhaustive list), may use the employer referral letters provided in this resource to make recommendations to their employer regarding the implementation of risk management measures. It is recommended that such an assessment is undertaken regularly during the period of the pandemic so that further opportunities to improve how the management of risks related to Covid-19 can be established in what is in effect a rapidly changing situation.

Accessibility of the completed Risk Assessment:

This risk assessment must not simply be a one off tick box exercise, undertaken once and then forgotten about, it needs to be a living document that is constantly updated as circumstances in the pharmacy and with the pandemic change. Furthermore, every community pharmacy will have more than one Responsible Pharmacist working on the premises at one time or another (even if that is just to cover a day off or holidays), some will operate with job share and locum pharmacists. It is important that the completed risk assessment document is available to all RPs and that it is left in a prominent position, probably alongside the usual SOPs that each Responsible Pharmacist will need to review before completing the RP register (or Pharmacy Record).

Just as the preservation of the RP register is the legal obligation of the pharmacy owner, similarly the accessibility of this document enabling a Responsible Pharmacist to discharge their obligation to secure the safe and effective running of the pharmacy is clearly the responsibility of the pharmacy owner.

The community pharmacy risk assessment tool is split into 5 sections

- 1. The design, operation and layout of the pharmacy
- 2. Prevention measures
- 3. Workforce assessments both collective and for individual staff
- 4. Contingency planning in the event of staff being exposed to Covid-19:
- 5. General Infection control measures

How to use this risk assessment tool

We recognise that every pharmacy is unique and tools such as this need to be adpated to fit an individual pharmacy context. This tool has been designed to enable the user to easily print the sections that need to be completed.

Basic Information about the Pharmacy Premises.			
Date			
Address of Pharmacy			
Date on which this assessment completed			
Completed by (full name)			
Position			

1. THE DESIGN, OPERATION AND LAYOUT OF THE PHARMACY

Workplace Assessment:

Can staff work		Tick one box	Notes
- all stall Work	ing in the dispensary maintain the 2m rule?		Yes is green. No is red.
Reducing the risks	In very small dispensaries Perspex screens separati in use then this may reduce the assessment to amb Consideration can also be given to increasing the si of the pharmacy. This may reduce the rating to gree	er. ze of the dispensary	
Can staff work rule?	ing on the Pharmacy Counter maintain the 2m		Yes is green. No is red.
Reducing the risks	If this is not possible, then the use of PPE would red Consideration can also be given to setting up two considerations only, the other that deals with OTC medistanced. This may reduce the rating to green	ounter areas in the p	harmacy – one that deals with
	ing on the Pharmacy Counter maintain the 2m pers of the public?		Yes is green. No is red.
Reducing the risks	The use of Perspex screens and/or PPE would reduce table in an isle some distance away from the actual		
Do you have a cases of COVI	designated isolation space for suspected D-19		Yes is green. No is red.
Reducing the risks	If staff can usher a member of the public exhibiting streduces risks to other members of the public and to		plation space in the pharmacy this
If your pharma	cy accepts cash payments, then is the risk of		
transmission r	educed by an operating procedure? (If no cast epted then skip to next question.)		Yes is green or amber. No is red
transmission r	educed by an operating procedure? (If no cash	ing procedure ashing after any casl	
transmission repayments accer Reducing the risks	educed by an operating procedure? (If no cash epted then skip to next question.) The rating Depends on the robustness of the operate Such an operating procedure should involve handward.	ing procedure ashing after any casl	
transmission repayments acce Reducing the risks Does your pha	educed by an operating procedure? (If no cash epted then skip to next question.) The rating Depends on the robustness of the operat Such an operating procedure should involve handwhave restricted the method of payment to card payment.	ing procedure ashing after any casl nents.	Yes is green. No is red.
transmission repayments acce Reducing the risks Does your phatransactions) Reducing the risks	educed by an operating procedure? (If no cash epted then skip to next question.) The rating Depends on the robustness of the operat Such an operating procedure should involve handwhave restricted the method of payment to card payments only accept card payments? (no cash	ing procedure ashing after any casl nents.	Yes is green. No is red.
transmission repayments acce Reducing the risks Does your phatransactions) Reducing the risks	educed by an operating procedure? (If no cash epted then skip to next question.) The rating Depends on the robustness of the operat Such an operating procedure should involve handwhave restricted the method of payment to card payments only accept card payments? (no cash Many retail outlets have restricted transactions to card payments).	ing procedure ashing after any cash nents. Ird only. This significa	Yes is green. No is red. Yes is green. No is red. Yes is green. No is amber.
ransmission repayments acce Reducing the risks Does your phatransactions) Reducing the risks Is the card pay Reducing the risks Have the prevent	educed by an operating procedure? (If no cash epted then skip to next question.) The rating Depends on the robustness of the operat Such an operating procedure should involve handwhave restricted the method of payment to card payments only accept card payments? (no cash Many retail outlets have restricted transactions to card payments system contactless?	ing procedure ashing after any cash nents. Indicate the risk of trans	Yes is green. No is red. Yes is green. No is red. Yes is green. No is amber.

Enter total number of Green, Amber and Reds at end of this section

Consultation Room

	Assessment		Tick one box	Notes			
1	Does your phar	macy use the consultation room at all?		No is green. Yes is red.			
	Reducing the risks The use of the consultation room should be discouraged. If the consulting room is used for essential activities only (such as supervised consumption) and PPE is used, then the rating may be reduced to amber.						
2 Is it possible to socially distance in the consultation room in your pharmacy? Yes is amber. No is							
	Reducing the risks	As it is an enclosed space, any use of the consultation If the consultation room must be used at all, then it is v PPE is used. If PPE is used, then the rating may reduce	ital that either 2m so				
3	Can you provid manner?	e for a chaperone in a socially distanced		Yes is amber. No is red.			
	Reducing the risks	As it is an enclosed space, any use of the consultation Chaperone, pharmacist and patient should each keep should be used, and this may reduce the rating to amb	2m apart from each				
4	intermittently b	ion room in your pharmacy in use oth for consultations and as an emergency for suspected Covid-19 infected patients?		No is green if no use of consultation room. Amber if not used intermittently. Yes is red.			
	Reducing the risks	As it is an enclosed space, any use of the consultation If an emergency leaves no alternative other than to use deep-clean process undertaken by a person wearing for of the consultation room.	the consultation ro	om as an isolation space, then a			
5	Is the consultin	g room routinely cleaned after each patient		Yes is amber. No is red			

As it is an enclosed space, any use of the consultation room raises the inherent risk to at least amber for a

One of these is that the virus can be deposited on surfaces by a carrier and left for another person to acquire through touching the contaminated surface. Cleaning the consultation room routinely minimises this risk.

Yes is amber. No is red.

Enter total number of Green, Amber and Reds at end of this section

variety of reasons.

consultation inside the room?

Reducing the

risks

Workload

Assessment Tick one box Notes

Are staffing levels being increased to reflect increased cleaning and workload levels?

Yes is green. No is red.

Reducing the risks

If there has been an increase in workload, but no reduction in opening hours and no additional staff is allowed then this introduces the risk of risk minimisation measures breaking down due to lack of time. E.g. reduced time for handwashing, cleaning worksurfaces etc. If an arrangement is reached with the employer either for extra staff to be made available or time freed up for the existing staff to enable cleaning or both, then this risk may be reduced to amber or green.

Is the pharmacy being allowed to reduce its opening hours (in line with NHS rules) to catch up with dispensing and cleaning of the pharmacy

Yes is green. No is red.

Reducing the risks

If there is a blanket head office ban on reducing the hours, with no consultation with the Responsible Pharmacist then this indicates that maintaining the operation of the business is the overriding imperative and that the safety of the local situation is not being fully considered. This will likely result in either inappropriate solutions being imposed, or no solutions being considered. Reaching an agreement with the employer to reduce the opening hours so as to catch up with the workload and clean the pharmacy may reduce the risk to amber or green depending on the extent of the agreements reached.

Is a home delivery service operated by your pharmacy and has it reduced the numbers of patients visiting or the time they spend in the pharmacy?

Yes to both questions is green. No to one or both is red.

Reducing the risks

Properly organised home delivery services can reduce the number of patients in your pharmacy and the amount time that they spend waiting for the medicines to be dispensed. Deliveries of medicines to those patients who are shielding, or self isolating provides a valuable public service and reduces the risks in the pharmacy.

Enter total number of Green, Amber and Reds at end of this section

2. PREVENTION MEASURES

Members of the public

Assessment Tick one box **Notes** Does signage and posters displayed in the pharmacy advise Yes is green. No is red. patients NOT to enter if they have any symptoms of Covid-19? Raising the awareness of the public as to the dangers of attending a pharmacy with symptoms of Covid-19 is Reducing the an important component of risk reduction. Employees should source the relevant posters online from the NHS risks and then display them prominently. This may reduce the risk rating to green. Are clear floor markings in place to ensure the public can Yes is green. No is red. maintain a 2m distance from others? Any initiatives designed to remind the public about and to encourage them to socially distance will reduce risks. Putting in place posters and floor or wall markings to encourage social distancing is a good way of Reducing the reducing the risk rating. Workwear and badges are now available for workers which emphasise the importance risks of the 2m rule. If these are worn, when it has not been possible to establish floor markings, then this may reduce the risk rating to amber. If the pharmacy is small and patients would be unable to maintain a 2m distance unless numbers allowed to enter are Yes is green. No is red. controlled, is there a one in one out protocol in place? Gatherings of members of the public at close quarters is a risk laden activity. Many retail outlets have Reducing the successfully observed a one in one out policy. This, however, requires extra personnel to maintain the order risks required. Does the pharmacy have a hatch that is used to manage the Yes is green. No is red. need for members of the public to enter the pharmacy? Putting in place simple practical measures to reduce the need to unnecessarily enter the pharmacy reduces the risk for patients and staff. A hatch can reduce the numbers entering the pharmacy. It also gives more Reducing the confidence and choice to those members of the public who would prefer not to enter the confines of a retail risks setting. In some cases, pharmacies have restricted the entire access to the service to a hatch only operation, this is often most useful when the staff situation has been severely depleted and the service now needs to be restricted If yes, then green. If measures 5 are in place, but no isolation area If a patient does come to the pharmacy and is showing signs of Covid-19, are there measures in place to isolate that person is available then it is amber, if no to prevent others from being infected? measures and no isolation area then it is red. Inevitably at some stage members of the public will present at the pharmacy exhibiting symptoms of Covid-19. Reducing the A suitably robust contingency plan must be in place and all staff members need to know what that plan is. This risks alone can reduce a risk rating to amber. Have measures to encourage patients to telephone rather than visit the pharmacy (for example to request repeats) been Yes is green. No is red. established? Encouraging simple measures such as inviting members of the public to call or email rather than visit if not Reducing the necessary reduces risks for patients and staff alike. This can be achieved through posters in the pharmacy risks window, messages inserted in bags used to deliver medication, notices left on the pharmacy website or even emails sent to regular patients. Is an enhanced delivery facility for basic items like paracetamol for patients who are self-isolating thus reducing Yes is green. No is red. the need for them to come to the pharmacy been established?

Reducing the

visit the pharmacy.

risks

Many self-isolating patients might need only P medicines if they are self isolating. A facility offering a delivery

service to self-isolating patients reduces the risks as otherwise they may be left with no alternative other than to

Members of the public (continued)

3	Is there a protocol/agreement with local surgeries to reduce patients coming into the pharmacy?				Yes is green or amber depending on the scope of the agreement. No is red.
	Reducing the risks Good lines of communication and a written protocol will referrals to the pharmacy from the surgery and vice ver place, the more likely this is a green risk rating				

Are there measures are in place for people to sign prescription exemptions with confidence?

Yes is green or amber. No is red.

Reducing the risks

Assessment

Asking patients to sign their prescriptions with their own pens or having a selection of pens available that are routinely cleaned after use may reduce the risk for members of the public as well as staff members who inevitably end up handling the pens.

Tick one box

Notes

Enter total number of Green, Amber and Reds at end of this section

2. PREVENTION MEASURES continued...

Staff

	Assessment		Tick one box	Notes
1	Have physical sin place to prot	screens at all the pharmacy counters been put ect staff?		Yes is green. Partial screening in certain areas only is amber. No is red.
	Reducing the risks	The installation of Perspex screening should reduce the where the 2m social distancing rule may be difficult to		particularly helpful in small pharmacies
2	Have staff beer all times?	n encouraged to practice respiratory hygiene at		Yes is green. No is red.
	Reducing the risks	Through training and raising awareness, the implication disposable tissues may reduce the risk rating. Disposand bins for their safe disposal must be available.		<u> </u>
		A range of posters are available from the NHS and the	e WHO supporting	risk reduction activities.
4	Have staff beer their shift?	n encouraged to routinely wash hands during		Yes is green. No is red.
	Reducing the risks	Transmission of the coronavirus is either through airbourness manually, with fingers then being exposed to implications of keeping the hands regularly washed for risk and the risk rating.	eyes or mouth. The	hrough training and awareness, the
		A range of posters are available from the NHS and the	e WHO supporting	risk reduction activities.
5	Have risk mitig	ating measures been established for staff in a		Yes is green. No is red.
	Reducing the risks	There are a range of options and these will be driven a processes have been put in place for staff in higher risk a higher risk category into a lower risk environment/ driven a lower risk environment.	sk groups? These	
6	Can staff maint	ain the 2m rule during their rest breaks?		Yes is green. No is red.
	Reducing the risks	Larger staff areas might allow this, where this is not portion breaks is a good way of keeping the numbers occupy temporary new areas that staff can use for rest break is also a way of reducing the number of staff that will be policy that sets out a maximum number of staff that me the risk rating.	ring the rest areas purposes, perhap be using the staff r	simultaneously to a minimum. Creating s outside at the rear of the pharmacy room at any one time. Establishing a
7	Do staff suppo	rt an effective and frequent waste disposal		Yes is green. No is red.
	Reducing the risks	Routine and frequent waste disposal will ensure that a virus such as paper towels, tissues or used protective infection is removed from the premises as a priority.		
8	reduce cross tr	acy arranged working in shift patterns to ransmission between staff? Either in a morning on off system or one or more days on and one ff.		Yes is green. No is red.
	Reducing the risks	This might not always be possible for small teams, but due to the pandemic. Splitting teams is a method which improves the resilience of the pharmacy operat prepared identifying the measures that would be implesimultaneously all members of staff either became ill of	ch reduces transn ion. If splitting tea emented to ensure	nission between staff members in a way ms is not possible, a plan should be e the delivery of the pharmacy service if

Enter total number of Green, Amber and Reds at end of this section

3. WORKFORCE ASSESSMENT BOTH COLLECTIVE AND FOR INDIVIDUAL STAFF

Overall workforce assessment

Tick one box

Notes

	ual risk assessment for each member of staff en? (A template has been provided).			Yes is green. No is red.
Reducing the risks	A risk assessment of individual staff members in relat requirement that all employers must undertake.	ion to cord	onavirus is	an absolute and minimum
If a risk assess	sment has been undertaken, have any emerging Idressed?			If yes and issues fully addressed then green. If issues only partially addressed then amber. If no then red.
Reducing the risks	The process of addressing issues that emerge from a members involved. Written records of any conversation			
High risk grou	os: Is a protocol in place or have discussions			
that are consid	stablish how staff (including the pharmacist) lered to be at high risk of infection or adverse a Covid-19 can be protected?			Yes is green. No is red.
that are consid	lered to be at high risk of infection or adverse			ome red. An action plan dealing with
that are considerate outcomes from Reducing the risks	lered to be at high risk of infection or adverse a Covid-19 can be protected? If an assessment is carried out without a clear action the main issues only is amber. An action plan dealing			ome red. An action plan dealing with

Individual Staff assessments:

Employers are required to undertake an assessment of individual members of staff. Employers must establish whether members of staff are clinically vulnerable, are in a household with somebody who is clinically vulnerable, are caring for someone who may be clinically vulnerable or they have protected characteristics and are entitled to additional reasonable adjustments. Additionally, employers should establish whether members of staff need additional support to protect their psychological health or wellbeing. For members of staff who exhibit higher (red) risk ratings, the option of the safest possible roles within the pharmacy, those that would allow for social distancing at all times should be considered. If this is not possible, then the employers need to consult with the affected employee to consider the use of additional safety measures. An individual staff assessment should be undertaken at the start of the risk assessment process, staff should be notified that if their circumstances change, then they should ask for an updated individual risk assessment to be undertaken.

Examples:

Assessment

- * Health conditions / specific risks that should be considered (this list is not exhaustive refer to latest NHS advice)
 - · Hypertension and cardiovascular disease
 - BAME ethnicity data shows that BAME higher risk
 - Diabetes Mellitus (DM)
 - Chronic Kidney Disease (CKD) or liver disease
 - Lung conditions COPD / asthma / bronchitis / emphysema
 - Obesity BMI over 40 considered risk
 - Age / Gender BAME over 55 and non BAME over 60 also male gender at greater risk.

Individual Staff assessment:

Name:		Date of Birth:	(age in years)
Gender: Are yo	ou a male?		No is green. Yes is red.
Reducing the risks	Males have been disproportionately affer assessment.	ected and thus this should be	considered as part of the overall risk
Ethnicity: Are (BAME) backg	you from a Black, Asian or minority or round?	ethnic	No is green. Yes is red.
Reducing the risks	The BAME group is not homogenous in highest risk other members of the BAM current advice and be specific to that in	E category have lower risks. T	he risk assessment must follow the late:
Age: Are you o	over 55? f from a BAME background)		No is green. Yes is red.
Reducing the risks	Initial data indicates that age 55 is the riwhat measures may be adopted to redu		
Age: Are you o (Only answer i	over 60? f NOT from a BAME background)		No is green. Yes is red.
Reducing the risks	Initial data indicates that age 60 is the rito what measures may be adopted to re		· ·
Do you have a workplace?	disability that requires an adjustme	nt in the	No is green. Yes is red.
Reducing the risks	Employers are required to provide addirisk rating to amber or green.	tional reasonable workplace a	djustments, if they do so, this reduces t
Do you have a	body mass index (BMI) of 40 or abo	ove?	No is green. Yes is amber or re-
Reducing the risks	The tool to determine BMI is on the NHS	S website.	
	alth conditions: Do you have any he ompromised immunity? *	alth	No is green. Yes is red.
Reducing the risks	*The current list is detailed on previous follow up on any assessment.	page but the latest advice sho	ould be checked when deciding how to
	sibilities: Do you have any caring s for someone who is clinically vuln	erable?	No is green. Yes is red.
Reducing the risks	Employers should make adjustments to clinically vulnerable individual that they		eing passed on via their employee to a
	nerable individuals: Do you live are h somebody who is clinically vulner		No is green. Yes is red.
Reducing the risks	Employers should make adjustments to clinically vulnerable individual living in the		eing passed on via their employee to a
being been un	ment of your psychological health a dertaken by your employer and acte		Yes is green or amber. No is red
Reducing the risks	Referral to psychological and wellbeing	support is a way that an emp	loyer can reduce the risk rating.
	eted for female staff only		
Pregnancy: A	re you more than 28 weeks pregnan		No is green. Yes is red.
Reducing the risks	This is a high risk group according to la SHOULD NOT be in direct patient-facing those from a BAME background should be a	ng roles. Amber may be for the	ose less than 28 weeks pregnant, howe

at end of this section

4. CONTINGENCY PLANNING IN THE EVENT OF STAFF BEING EXPOSED TO COVID-19

Processes in place in the event of staff being exposed to Covid-19:

Tick one box **Assessment Notes** Are arrangements in place to enable any member of staff (especially the pharmacist) who feels unwell or who may be exhibiting typical symptoms of Covid-19 (persistent cough, Yes is green. No is red. high temperature or loss of taste and smell) to leave the pharmacy, go home and self-isolate? Thinking through such eventualities prior to them occurring is an important and necessary measure that should Reducing the be established for all pharmacy services. An agreement and an understanding reached after consultation with risks all members of staff followed by the creation of a clear written SOP / protocol for this reduces the risk rating. Is there a process in place to try to ascertain the likelihood of whether other team members may have been infected during Yes is green or amber. No is red. the incubation period from the member of staff who is now showing symptoms? A team member might have exhibited symptoms only after a few days have passed. This means that other staff members might have acquired the infection from that person whilst they were asymptomatic. A simple process, or even a checklist that is established in advance of such an eventuality may reduce the risk rating to Reducing the amber or green depending on its robustness. This can involve sending out the respective staff members for a risks coronavirus test, or it can include additional measures such as monitoring the temperature of staff members and/or asking them to complete a self-assessment survey. Most importantly of all, these measures are only robust if the results of their findings are capable of being risk assessed and acted upon. In light of the national Track and Trace system which has been established to control the pandemic, are all members of staff Yes is green. No is red. encouraged to carry mobile phones whilst at work? Upholding authoritative actions called for as part of a national Public Health initiative is part of a professional requirement placed upon pharmacy owners, employers and individual pharmacists. Whilst historically, staff Reducing the working in a pharmacy are required not to carry mobile phones whilst at work, such restrictions must not only risks be removed in response to the pandemic, but the carrying of mobile phones must be actively encouraged by employers. Are arrangements in place to enable any member of staff (especially the pharmacist) who is contacted by the national Yes is green. No is red. Track and Trace service and told to leave their place of work, to go home and self-isolate? This will increasingly become a likelihood as the Track and Trace system becomes more established. Measures to reduce the risk rating may include; A & B teams; Dividing the pharmacy team into 2 or more shifts that never work at the same time, so that they cannot be impacted by contact with a staff member of the other shift. Preparing a compliment of locums by making them familiar with the pharmacy ahead of any track Reducing the and trace consequences and calls for self-isolation so that if the incumbent regular pharmacist and/or risks pharmacy technician needs to self-isolate another is readily available to keep the pharmacy open. Agreeing in advance how, in the worst-case scenario, staff from several pharmacies from different businesses in a local area may work together to maintain a service from one premises in a locality. Considering now, how those isolating but not sick might still be able to undertake meaningful work at home in a way that still helps the public, but in a way that maintains the self-isolation, keeps patient data protected and which is compliant with regulations. Is there a temperature assessment policy (or similar) to include a logging system in place for all members of staff as Yes is green. No is red. they start their shift in the pharmacy?

Reducing the risks

This is potentially an early identifier and reduces the risk of infecting others. Another method of checking for earlier signs of Covid-19 infection is the use of an oximeter, which measures blood oxygen saturation. This would help to identify those who may not yet have a raised temperature but may already be Covid-19 positive. Putting in place vigilance systems may reduce a risk rating. Those members of staff showing symptoms of Covid-19 should be sent for a test and sent home to self-isolate pending results.

5. GENERAL INFECTION CONTROL MEASURES

Overarching Infection Control Measures to protect the health of the public

The employer should establish processes and procedures that are designed not only to keep the workplace clean, but also to implement systems that reduce the risk of transmitting the infection not just for staff members but also for members of the public and others entering the pharmacy.

Overall infection control

Assessment Tick one box **Notes** Are hand sanitisers available for all patients to use as they Yes is green. No is red. enter the pharmacy? Ideally, such hand sanitisers should be available near to the entry points of the pharmacy. Members of the Reducing the public should be encouraged to use these as they help to prevent them from spreading any infection to items risks that they handle whilst browsing. Posters available from the NHS can be used to support such an exercise. Do staff wash hands or use hand sanitizer after they have Yes is green or amber. No is red. handled items handed to them by members of the public? One way that the infection can pass to a member of staff from an infected person is if the virus is transferred Reducing the from a surface, via the hands to the eyes or to the mouth. As well as a regular handwashing policy being risks established, raising awareness about avoiding putting fingers into the eyes or the mouth goes a long way to reducing the risk rating. Are disposable hand towels available at all times? Yes is green. No is red. Hanging towels that can become wet and be impregnated with the virus should be avoided and even hot air Reducing the hand dryers can create airstreams that increase the risk of droplet spread. Disposable hand towels are the risks preferred option if there is a satisfactory and safe system for their disposal in place. Do staff wear gloves to protect them from handling Yes is green. No is red. prescriptions/ paperwork or items touched by patients? This may provide an additional level of protection, especially for those with broken skin such as those with fresh Reducing the cuts or grazes, or for those suffering with eczema. risks Is there a documented cleaning process within the pharmacy? Yes is green or amber. No is red. A clear and robust cleaning process must be in place and a record of undertaking it must be kept. Such a Reducing the policy must be capable of being adapted in the event of a higher risk incident e.g. a patient who has Covid-19 risks unexpectedly enters the pharmacy, or a member of staff falls ill. Reliance on ad hoc cleaning alone could have the effect of increasing the risk. Is there a routine deep clean process in the pharmacy? Yes is green. No is red. The interval and process and materials used for the deep clean must be clearly stipulated and followed. Failure Reducing the to deep clean the pharmacy at routine intervals or when high risk incidents occur increases the risk to staff and risks patients. A routine documented deep clean process reduces the risk rating. Is there a routine disinfecting process in place for the Pharmacy counter and other frequently touched surfaces after Yes is green or amber. No is red.

door handles, shopping baskets etc.

each patient?

Reducing the

risks

Public areas need to be regularly cleaned to prevent passing on the infection to other members of the public and staff. A range of solutions can be adopted. In the most extreme situations, in an area that is known for high levels of infection, a policy where counters are wiped down with antiseptic solution after each transaction, or

at very short intervals may be considered, in others a cleaning rota involving routine cleanings, the frequency

of which is determined by the volume of transactions can be established. Whichever solution is adopted, a written protocol should be created. In any event, cleaning stations should be installed and over and above the scheduled cleaning processes, the staff should be encouraged to routinely wipe down work surfaces, pens,

Overall infection control (continued)

		Tick one box	Notes
Do staff safely	wear the relevant face mask?		Yes is green. No is amber or red.
Reducing the risks	This question relates to the relevant face masks; the of stopping airborne droplets. Those employers prolittle protection from prolonged exposure to member	oviding safety masks	
Do staff safely	wear a visor?		Yes is green. No is red.
Reducing the risks	This is an additional level of protection (i.e. in additional airborne droplets from entering the body via the co		,
Are staff being	prevented or discouraged from wearing PPE	?	No is green. Yes is red.
Reducing the risks	Under no circumstances should the use of PPE be to the risk of infection. It will also cause anxiety and		
	y able to secure PPE and cleaning materials a normal wholesaler supply channel?	as	Yes is green. No is red.
Reducing the risks	Should difficulty in obtaining PPE supplies be enco responsibility of the employer to do so. If all else fai PPE and claim this money back from the employer to be a comprehensive and enduring arrangement,	ils, staff members sh . This would reduce t	ould source and purchase their own he risk rating to amber as it is likely not
Is there any ver	ntilation available in the pharmacy?		Yes is green. No is red.
Reducing the risks	Ventilation disperses any airborne particles of the C windows or through forced mechanical ventilation s		

Using the Risk Assessment Classification calculator

The numbers of respective red, amber and green scores should be entered at the foot of each section. These should then be transferred to the table below. It will then be possible to identify at a glance how each of the areas performs.

This tool can then be used in two ways simultaneously.

1. Creating A Framework:

Use the tables to identify those areas with a majority of Green ratings, these are likely to be relatively well risk managed. Those identified as having a majority of Red risk ratings are unsatisfactory and should be prioritised as the ones in need of urgent attention. A range of risk management measures are contained in the *'Reducing the risk'* sections underneath each row, however, whilst they contain many useful ideas on how to identify and then minimise risks, they are only provided to demonstrate the working mechanism of this Risk Assessment Tool.

It is recognised that no two pharmacies are the same and therefore each may need a slightly different approach in managing the risks during the pandemic. As well as there being additional ideas that the staff and/or the RP in the pharmacy may find of greater relevance than the examples provided for illustrative purposes, the GPhC, the various Pharmacy representative bodies, the NHS and WHO have all produced lists of additional measures (see **Section 3**). The intention of this **Community Pharmacy Risk Assessment tool** is so that it can be used by the staff of the pharmacy to kick-start the systematic process of workplace assessment. Those assessing the risk, should tick the red, amber or green column adjacent to the risk described.

In this way, the risk assessment and management exercise seeks to secure a majority of green ratings in each of the areas under scrutiny. Importantly, like any risk management tool it cannot guarantee the safety of staff, but it does at least provide a systematic approach and a framework to enable pharmacy teams to establish the level of the risk of infection for their pharmacy and then focus upon activity that will reduce that risk.

2. A System Improvement Process

Even if a section receives an overall majority of green ratings, a continual system improvement process should be installed which seeks to routinely re-visit the assessment with a view of constantly seeking to remove any red ratings by implementing risk management measures that reduce the red ratings to amber or green

Risk Assessment Table		
Identify the colour of the rating seen most frequently for each section		
Workplace		
Consultation Room		
Workload		
Prevention measures (members of the public)		
Prevention measures (staff)		
Overall workforce assessment		
Individual staff assessments		
Processes in place in the event of staff being exposed to Covid-19:		
General Infection control		

ACTION PLAN PROPOSAL

Identify the areas that need urgent attention and list the measures that need to be implemented.				
Issue identified in need of attention	Target risk rating	Measures to be implemented	Target date for implementation	

What to do in the event of an unsatisfactory outcome.

A majority of red ratings in any section in the Risk Management Assessment tool will establish whether more measures need to be installed. Should this be the case then a menu of additional measures can be considered and a plan for future risk reduction can be developed by the user. Ideas for additional measures are provided in the '**reducing the risk**' section below each row, but these are not an exhaustive list (see **Section 3** for references on additional measures). Employees undertaking the assessment may consider organising a consultation with fellow employees to discuss which risk reduction measures might be best used to reduce the risks of infection. Employers are advised at this stage to commit to consulting with staff and to involve them in the deployment of any additional measures. Employee's should give a copy of their risk assessment to their employer and discuss their findings and concerns with them. In consultation with the employer, a specific action plan to be followed should be agreed. The PDA can assist members with such conversations with employers.

Raising concerns with employers

Raising concerns that may emerge from undertaking the risk assessment can be done in a variety of ways, but importantly, it must be done in a way that can produce a record. This might be via email, or via other forms of correspondence. To this end, the template letters described on the following pages may be used to enable Responsible Pharmacists or others to raise their concerns and put their suggestions on reducing the risks to their employers. It is important to note, that being involved in this process, **DOES NOT** abrogate the legal duty of employers to ensure that both a risk assessment is undertaken and also that appropriate risk mitigating measures are put in place, but it may make it easier for the employers to exercise that legal duty.

A statement upon the risks

A natural component of Health and Safety philosophy is that whether the assessment indicates that current measures are satisfactory or not, the employer must produce a clearly defined statement on the risks in that pharmacy and such a statement must be made available to all members of staff. This should outline the date and the findings of the most recent assessment and a list of the steps (if any are needed) that are to be taken together with an implementation timetable.

MANAGING THE RISK: TEMPLATE LETTERS

Sample template to employer

Dear [Owner, Area Manager or superintendent Pharmacist name]

Considering the special risks associated with the current pandemic, I have recently undertaken an assessment of the pharmacy to identify the risks associated with Coronavirus at [XYZ Pharmacy, 123 Safe Way, Anytown, UB6 0YD.] I have used the risk assessment tool provided by my union and the intention of this exercise is to reduce the risk of transmission of Covid-19 in the pharmacy.

This exercise has identified issues that may affect the health and safety of staff and the members of the public who may rely on the pharmacy.

ALTERNATIVE PARAGRAPH A:

The risk assessment, which considers the existing measures in place, has identified areas in which the risks are worryingly high and the exercise has therefore identified remedial measures which would reduce that risk. I would welcome the opportunity of sharing my findings with you and note that the key issues are.

Insert both the list of concerns and the proposed remedial measures.

ALTERNATIVE PARAGRAPH B:

I know we have already discussed these matters, but it seems appropriate to summarise them again below to help you in addressing them as soon as possible.

EXAMPLES OF ISSUES TO RAISE (based on actual member queries already raised with the PDA):

- We are unable to ensure a 2m social distance at all times and the corporate SOP prohibits the wearing of any PPE. Suggestion: We ask that the SOP is changed. We ask that Perspex screens are erected to mitigate this risk.
- I have been verbally informed by the non-pharmacist manager that locums must provide their own PPE.

 Suggestion: If locums cannot source any PPE, this places the staff in the pharmacy at risk and it is suggested that they are allowed to use PPE provided to the regular personnel by the employer.
- There are no alcohol gel disinfectant dispensers available for use by members of the public upon entering the pharmacy.
 - Suggestion: We recommend that a hand sanitisation station is established near the front door.
- There are times in the day when the pharmacy is congested with dozens of members of the public.

 Suggestion: It is recommended that a maximum number of customers is agreed and that this is then administered on a one in one out basis.
- There is no facility to offer deliveries of non-prescription items to those advised to self-isolate thus increasing the risk that they may visit the pharmacy personally to obtain items such as paracetamol.
 - Suggestion: It is recommended that such a service forms an extension of the normal prescription delivery service.
- Pharmacy personnel are prohibited from carrying mobile phones in the pharmacy and are therefore excluded from the
 possibility of being contacted and protected by the national Track and Trace initiative.
 - Suggestion: This policy should be reversed.

I am drawing your attention to these issues I am concerned for the safety of all who work here and also because there is a regulatory and statutory legal requirement placed upon all employers to address the risks to staff and patients in pharmacy premises.

I hope you will be able to respond soon.

An alternative sample template

STATEMENT UPON THE RISKS OF Covid-19 TRANSMISSION

A "Covid-19 Transmission" risk assessment was carried out in [XYZ Pharmacy, 123 Safe Way, Anytown, UB6 0YD], on Monday June 1st 2020.

Risk Assessment: The risk assessment established that the Pharmacy had risks identified as majority RED

in certain areas.

Risk Management: The risk management assessment indicated that additional measures were required in

the areas of

a) Use of consultation room

b) Workload and time for cleaning

c) Prevention measures

Results of staff consultation: Consequently, after consultation with the staff: it was agreed that the following measures would need to be implemented:

a) Use of the consultation room would be prohibited as of immediate effect

b) The pharmacy hours would be reduced by 1 hour per day to enable the proper and uninterrupted cleaning of the pharmacy; as of June 15th

c) Clear floor markings setting out 2m distances would be installed on the pharmacy shop floor as of 7th June.

We would ask that the employer notes and agrees these proposals or alternatively discusses alternatives that may offer the equivalent protection as a matter of urgency.

The next Risk Assessment is due to be carried out on June 28th 2020.

Signed

The Responsible Pharmacist

3. ADDITIONAL RESOURCES FOR BACKGROUND READING

Examples of Good Practice noted by the GPhC Regulator:

As the GPhC inspectors travel around the various pharmacies and assist them by working as pharmacists during the pandemic, they identify measures being taken by numerous pharmacies to manage them safely and they have publicised these good ideas on the GPhC's website.incorporates key elements relevant to the pharmacy setting. It also incorporates the higher risk for BAME groups that should be considered. (Click on the links provided to read the articles)



Managing access to pharmacy services safely

Pharmacy type

Pharmacy context

Relevant standards

Why this is notable practice

The pharmacy is managing the increase in demand for over-the-counter medicines and health and personal care products. It is doing this to n the risk of contact these people have with other people attending the pharmacy to collect prescriptions.

How the pharmacy did this

he pharmacy's over-the-counter (OTC) business had increased significantly during the COVID-19 pandemic. The pharmacy controlled the number of opile going into the premises at any one time. People were directed to a counter at the front of the premises if they needed to purchase something, do a counter at the rear of the premises was used by people collecting their prescriptions. The positioning of the two counters allowed two separate utes in and out of the pharmacy.

What difference this made to patients

el confident they can follow social distancing guidance effectively when using the pharmacy. And they can obtain their medicines efficiently as ream members focus on attending to people at each counter, And people can feel confident

https://inspections.pharmacyregulation.org/knowledge-hub/ notable-practice/managing-access-to-pharmacy-servicessafely-227



Splitting the pharmacy team to support service continuity during the COVID-19 pandemic

Pharmacy type

Pharmacy context

Relevant standards

Why this is notable practice

The pharmacy's business continuity plan is regularly updated, and the working patterns are changed to ensure that if one member of the team has symptoms of COVID-19 and needs to self-isolate, there are other team members available to work at the pharmacy.

How the pharmacy did this

The superintendent had reviewed the business continuity plan and implemented several changes to the working practices of the pharmacy. Thesi included large information posters for patients, an updated and more intensive cleaning rota, staff training on the correct use of personal protect

https://inspections.pharmacyregulation.org/knowledge-hub/ notable-practice/splitting-the-pharmacy-team-to-support-servicecontinuity-during-the-covid-19-pandemic-183



Using feedback from pharmacy team members to inform the safe delivery of pharmacy services

Pharmacy type

Pharmacy context

COVID-19

Relevant standards

· 2.5 - Staff are empowered to provide feedback and raise concerns about meeting these standards and other aspects of pharmacy services

Why this is notable practice

The Superintendent Pharmacist (SI) is providing pharmacy team members with regular opportunities to discuss their or the pharmacys workload. He is working with team members to agree changes to procedures to support them during the pharmacys workload.

How the pharmacy did this

The SI spoke to each team member individually to give them a chance to express their concerns and ask questions. The SI was aware that team members may be worried about the way they were working during the pandemic. So, he wanted to ensure that they had an opportunity to express their concerns and find out what changes could be made to address them.

As a result of these discussions the 51 learned that team members were concerned that they may not have the capacity to continue providing the mu compartment compliance packs service. And this concern was pushing them under pressure. The number of people receiving compliance packs in increased prior to the pandemic. So, the 51 had written to everyone receiving packs informing them the plannary may need to review the service in

https://inspections.pharmacyregulation.org/knowledge-hub/ notable-practice/using-feedback-from-pharmacy-team-membersto-inform-the-safe-delivery-of-pharmacy-services-211



Reducing interruptions during the dispensing process by supporting a team member to work remotely.

Pharmacy type

Pharmacy context

Relevant standards

. 4.2 - Pharmacy services are r

Why this is notable practice

The pharmacy is supporting a team member in the shielding group by allowing them to work from home. The pharmacy team member is an emails through the pharmacy's secure email account during this time.

How the pharmacy did this

The pharmacy had directed as many people as possible to submit any comments and queries to the pharmacy by e-mail rather than the COVID-19 pandemic. This kept phone lines free for urgent calls. And allowed a pregnant member of the team to continue working home. The team member was dealing with any queries within her competencies. The team member was providing the pharmacy with of people requiring medicines to be delivered each day, and was able to forward prescription requests securely to surgeries. All other collated and sent to the pharmacist at the end of the day to be dealt with.

https://inspections.pharmacyregulation.org/knowledge-hub/ notable-practice/reducing-interruptions-during-the-dispensingprocess-by-supporting-a-team-member-to-work-remotely.-207



Proactive steps to reduce the risk of transmitting COVID-19

Pharmacy type

Pharmacy context

Relevant standards

Why this is notable practice

How the pharmacy did this

The pharmacy had introduced social distancing measures in the dispensary by creating clearly segregated work stations, which were placed two metre apart. In addition, the pharmacy had given each member of staff their own portable phone so that they did not have to share phones with one another The pharmacy had a wholesial edealise licence and so it used tamper-poor cardboard boxes for delivering specialised medicines to hospitals rather than the usual plastic totes. The change to using the single-use cardboard boxes meant that risk associated with cross-infection was reduced.

The pharmacy manager had also set up a staff baseline temperature chart and a staff baseline oxygen saturation level chart. These w measured every week and if anyone reported that they were not feeling well. This was done as an additional precaution to help identified the stage of the stage

https://inspections.pharmacyregulation.org/knowledge-hub/ notable-practice/proactive-steps-to-reduce-the-risk-oftransmitting-covid-19-221



Effective use of a local urgent pharmacist cover scheme.

Pharmacy type

Pharmacy context

Relevant standards

Why this is notable practice

ons to reduce the need for the pharmacy to close in the event a pharmacist falls ill and The pharmacy is working collaboratively with other orga there is a shortage of locum pharmacist availability.

How the pharmacy did this

https://inspections.pharmacyregulation.org/knowledge-hub/ notable-practice/effective-use-of-a-local-urgent-pharmacistcover-scheme.-197



Review of the pharmacy layout to support social distancing

Pharmacy type

Pharmacy context

Relevant standards

. 1.1 - The risks associated with providing pharmacy services are identified and managed

Why this is notable practice

In order to support social distancing guidelines during the COVID-19 pandemic the pharmacy team have reviewed the pharmacy layout so that people can stand more than two metres apart whilst they are in the pharmacy.

How the pharmacy did this

The pharmacy was in an old listed building which was very small. The shop floor was usually quite cramped with very narrow alsies. To create space on the shop floor, the pharmacy team had removed the central goodola from the pharmacy. This allowed a line of tape to be put two me from the counter and they displayed a notice that people should stand behind the line. The stock that had been removed from the gondola we to the stock room as it mostly consisted of non-essential items.

What difference this made to patients

https://inspections.pharmacyregulation.org/knowledge-hub/ notable-practice/review-of-the-pharmacy-layout-to-supportsocial-distancing-173



Creating two separate pharmacy teams and working collaboratively with others to support service delivery

Pharmacy type

Pharmacy context

Relevant standards

Why this is notable practice

The pharmacy is focussing on providing services to the local popul proactively with other healthcare organisations to support people. rulation. And it has adapted its working processes and staff rota to do this. It is working

How the pharmacy did this

The pharmacy had extended its opening hours to be open from 08:00-17:30 seven days a week. It had shared these details with the local NHS te And the new opening hours were advertised on www.nhs.uk. The pharmacy management team had also considered the impact of closing its do the public across the Easter bank holdings, And So, had taken the decision to remain open.

https://inspections.pharmacyregulation.org/knowledge-hub/ notable-practice/creating-two-separate-pharmacy-teamsand-working-collaboratively-with-others-to-support-servicedelivery-172



The pharmacy's team members are supported in accessing NHS counselling services

Pharmacy type

Pharmacy context

Relevant standards

Why this is notable practice

The pharmacy is providing additional emotional support for its team members by arranging access to NHS counselling services. This is helping team members cope with the challenges they face during the COVID-19 pandemic.

How the pharmacy did this

The superintendent pharmacist had identified how his team members were feeling anxious and overwhelmed. This was in the wake of increased workload and stressful conditions caused by a heightened demand for pharmacy services during the COVID-19 pandemic. Consequently, he had sooken to the Local Pharmaceutical Committee about any support available for his team. They had referred him to the Clinical Commissioning for who had opened up their staff counselling service to members of the pharmacy team. Support could be accessed by a variety of means, including through a website, by phone, email or an online chat service. At first contact, a trained person assessed the support needed and referred to the appropriate resource. Several members of the pharmacy team had eccessed this support and had found it useful.

https://inspections.pharmacyregulation.org/knowledge-hub/ notable-practice/the-pharmacys-team-members-are-supportedin-accessing-nhs-counselling-services-171

Advice from CPO of England to all employers of pharmacists:

Scheme extended to locums

An NHSE&I official clarified during the webinar that the scheme would also extend to locum pharmacists.

"It's about whether the pharmacist has been working delivering NHS services in an environment where in the previous 14 days they could have contracted the virus from contact with patients or service users... it's about situational risk rather than employment status," they said.

Mr Ridge also referred to recent findings indicating that BAME individuals appear to be at greater risk of dying from Covid-19 and said: "I expect pharmacy employers, be that the NHS or others, to carry out a risk assessment and put in place measures to mitigate those risks. I'll be paying very close attention to those matters."

NHSE&I primary care director Nikita Kanani said a risk assessment tool would soon be available to community pharmacies to help reduce the risks faced by BAME staff members. The tool will address issues at workplace, workforce and individual levels, she said.

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https://www.pharmacynetworknews.com/ridge-life-assurance-covers-all-team-members

Examples of clear explicit Guidance issued:

Covid-19: Social Distancing. Protecting yourself and your teams

All frontline pharmacy teams are understandably concerned about protecting themselves from exposure to Covid-19. We share this concern and recognise the important steps that those providing frontline services can take to preserve continuity of vital, safe, pharmacy services.

It is important that pharmacy professionals, superintendents, responsible pharmacists, chief pharmacists and owners are aware that public health advice continues to emphasise social distancing is the most effective protection against the spread of Covid-19.

All pharmacy settings should consider how social distancing (at least two metres) can be achieved. If it is not possible to maintain the two metre distance the entrance of the pharmacy should be closed and entry controlled so that two metre distance can be maintained. This is to protect staff and users of the pharmacy.

This does not negate the need for all pharmacy teams to have access to appropriate PPE for specific instances where it is a necessary addition to social distancing measures, for example when working in small dispensaries.



PharmaceuticalSociety 0

Phosph Paul Bennett

Julie Greenfield

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ROYAL Pharmaceutical Society

https://www.psni.org.uk/wp-content/uploads/2020/03/ SocialDistancing-Letter-30-march.pdf





Protecting Staff

Social distancing is crucial for preventing the spread of contagious illnesses such as COVID-19 which can spread through coughing, sneezing and close contact. By minimising the amount of close contact with others, chances of catching and spreading the virus to others is reduced.

Practical steps for pharmacies to protect staff by minimising the risk of spreading COVID-19:

Put clear signage on the door advising people **NOT** to enter the pharmacy if they have symptoms of COVID-19.

Screen patients **BEFORE** they enter the pharmacy and limit the number of people allowed in at any one time to ensure social distancing.

Provide a two metre area between staff and customers, by siting a table at the pharmacy door, chairs in front of the counter or by segregating sections of the pharmacy for customers and staff. Use tape to mark floors or physical barriers to encourage this. If you have a dispensing hatch or screen use it. Provide a dedicated "prescription pick up" area so medicines are not handed directly to customers.

If possible, telephone patients when their prescription is ready for collection to avoid waiting within the pharmacy.

If a patient is suspected of having COVID-19 and has already entered the pharmacy they should be isolated in line with guidance and Personal Protective Equipment should be worn by pharmacy staff providing care.

Follow good infection control procedures. Surfaces must be cleaned regularly; for decontaminating/disinfecting surfaces national infection prevention guidance recommends that disposable cloths/paper towels and a fresh solution of general purpose detergent & water be used. Staff should wash their hands frequently with soap and hot water. Provide hand sanitiser for staff and customers.

http://www.cpwales.org.uk/The-Health-Landscape/Coronavirus-Information-Updates/Guidance-on-managing-the-pharmacy/Support-for-Pharmacy-Staff.aspx

Example of clear Professional Guidance on when to use PPE:

In which pharmacy could you maintain a social distance greater than 2m at ALL times?

What does this new PHE guidance on PPE mean for me if I work in a Community Pharmacy or General Practice?

If you can maintain a social distance of 2 metres at all times (from patients AND other staff) then you are not required to wear any PPE. It is still very important you wash your hands often and for 20 seconds or more.

If you cannot maintain a social distance of 2 metres at all times (from patients and other staff) then it's recommended that you wear a Fluid Resistant (Type IIR) Surgical Mask (FRSM). This can be worn for a full session [see FAQ below]. It is still very important that you wash your hands often and for 20 seconds or more.

When wearing an FRSM it is important to still maintain social distance (2 metres) wherever possible (staff and patients/public).

What is meant by sessional use regarding PPE?

A single session refers to the period of time where a pharmacy team member is in the pharmacy or general practice. A session ends when the pharmacy team member leaves the pharmacy area or general practice.

Once the PPE has been removed it should be disposed of safely, and not reused or recycled. The duration of a single session will vary depending on the clinical activity being undertaken.

https://web.archive.org/web/20200531105617/https://www.rpharms.com/resources/pharmacy-guides/coronavirus-covid-19/guidance-for-pharmacy/protecting-your-team-in-the-pharmacy

Examples of advice that identifies the problems faced by community pharmacy:

Note that no mention of 2m distancing, the focus appears to be on cost.

Q. The sourcing of PPE through wholesalers is another financial burden for contractors. What is PSNC doing to ensure pharmacies have access to PPE and that the cost of PPE purchased through wholesalers is accounted for?

PSNC is pressing DHSC and NHSE&I to ensure that pharmacy teams have access to the PPE they need from the PHE stockpile. We are also working to ensure that the cost of PPE is reflected in the additional pandemic funding we are seeking for the sector.

Q. It is not possible for staff to maintain 2 metres social distancing in our small dispensary. What is the guidance on use of PPE within a small dispensary?

Public Health England's (PHE) updated guidance on the use of personal protective equipment (PPE), published on 2nd April 2020, recommends the use of fluid-resistant surgical masks (FRSM) in pharmacies when working in an area with possible or confirmed cases and where pharmacy teams are unable to maintain 2 metres social distance from patients.

The PHE guidance does not recommend use of FRSM where staff do not have contact with patients, e.g. staff working solely in the dispensary. However, we recognise that in most pharmacies, staff cannot confine their work to a single area of the premises, which is either patient-facing or with no direct dealings with patients. It is therefore likely that many pharmacy contractors and their teams will decide that staff working in multiple locations throughout the pharmacy premises may need to wear FRSM.

Q. PPE remains an issue for community pharmacy, when can we expect an update on community pharmacy having access to the PHE PPE stockpile?

PPE from the stockpile is being supplied on a weekly basis to three mainline wholesalers (AAH, Alliance Healthcare and Phoenix Healthcare). Please note this update on availability of PPE from wholesalers (29th April 2020).

https://psnc.org.uk/the-healthcare-landscape/covid19/covid-19-frequently-asked-questions/

Examples of notable Proactive Behaviours:

All pharmacies in Northern Ireland receive PPE visors

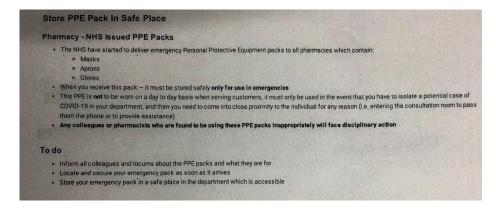


All community pharmacies in Northern Ireland are being issued with protective visors to provide "an extra level of protection" over and above the NI Department of Health's PPE guidelines.

https://www.pharmacynetworknews.com/all-pharmacies-in-northern-ireland-receive-ppe-visors

Examples of poor behaviours by certain owners of large pharmacy chains:

PPE - The same guidelines still apply, see the post on Speakap. No mask or gloves to be worn whilst working under any circumstances. A hanging solution for a perspex screen will be with you soon. I am giving you a heads up, time frames not confirmed yet. Its likely to be 7-10 days until it lands in your branch, with guidance for you to install.



Sources and Resource Links:

- 1 https://www.theguardian.com/world/2020/may/19/fifth-of-patients-with-covid-19-may-have-caught-it-in-hospital-study-finds
- ² https://www.pharmaceutical-journal.com/news-and-analysis/news/worrying-proportion-of-minority-ethnic-pharmacists-suspended-or-struck-off-gphc-register/20206192.article

General Pharmaceutical Council:

https://www.pharmacyregulation.org/news/statement-testing-and-tracing-services-across-great-britain

Royal Pharmaceutical Society:

https://www.rpharms.com/resources/pharmacy-guides/coronavirus-covid-19/guidance-for-pharmacy/protecting-your-team-in-the-pharmacy

National Pharmacy Association - posters to use during pandemic

https://www.npa.co.uk/coronavirus-updates/coronavirus-npa-advice-to-patients-and-the-public/posters-to-use-during-the-covid-19-pandemic/

Pharmaceutical Services Negotiating Committee:

https://psnc.org.uk/our-news/nhs-test-and-trace-update-for-community-pharmacy/

Community Pharmacy Scotland:

https://www.cps.scot/news-insight/news/test-and-protect-sharing-good-practice/

Public Health Authorities:

https://www.gov.uk/government/publications/covid-19-management-of-exposed-healthcare-workers-and-patients-in-hospital-settings/covid-19-management-of-exposed-healthcare-workers-and-patients-in-hospital-settings

Faculty of Occupational Medicine: Risk Reduction Framework (as seen on pages 10-11)

https://www.fom.ac.uk/wp-content/uploads/Risk-Reduction-Framework-for-NHS-staff-at-risk-of-COVID-19-infection-12-05-20.pdf

Poster resources:

https://coronavirusresources.phe.gov.uk/nhs-resources-facilities/resources/

NHS – Community Pharmacy Standard Operating procedures:

https://www.england.nhs.uk/coronavirus/wp-content/uploads/sites/52/2020/03/Novel-coronavirus-COVID-19-standard-operating-procedure-Community-Pharmacy-v2-published-22-March-2020.pdf

Welsh Government:

https://gov.wales/sites/default/files/publications/2020-05/covid-19-workforce-risk-assessment-tool.pdf

British Standards Institute:

https://www.bsigroup.com/en-GB/topics/novel-coronavirus-covid-19/covid-19-guidelines/

World Health Organisation - Public information posters

https://www.who.int/emergencies/diseases/novel-coronavirus-2019/advice-for-public

https://www.who.int/westernpacific/news/multimedia/infographics/covid-19

 $https://www.who.int/images/default-source/health-topics/coronavirus/risk-communications/general-public/protect-yourself/blue-3.\\ png?sfvrsn=b1ef6d45_2$

General Poster resources

Hand washing:

https://www.stokeccg.nhs.uk/your-ccg-stoke/sot-publications/generic-publications-2/newsletters-alerts-and-publications/covid-19-resource-folder/2838-covid-19-hand-washing-techniques-landscape-poster/file

Respiratory hygiene:

https://www.infectionpreventioncontrol.co.uk/content/uploads/2019/06/Respiratory-and-cough-hygiene-poster.pdf