

SUMMARY OF THE RESPONSES TO DEPARTMENT OF HEALTH CONSULTATION DOCUMENT “ACTION ON HEALTH CARE ASSOCIATED INFECTIONS IN ENGLAND” PUBLISHED IN JULY 2005.

- 1) The consultation document “Action on Health Care Associated Infections in England” set out a range of measures designed to give a firm statutory footing to accepted best practice to monitor and reduce levels of health care associated infections in England.
- 2) One hundred and twenty one responses were received by the closing date of the consultation, 23 September 2004. For detail on the classification of respondents, please see Annex A.
- 3) The consultation document included four specific questions, as well as offering the opportunity to comment on the proposals more widely. The questions were:
 1. Does the Code of Practice cover sufficiently broad a scope in respect of tackling health care associated infections?
 2. Is there sufficient detail and clarity in the Code of Practice in what it requires of service providers?
 3. Do the proposals apply sufficient pressure on health care organisations to bring about changes in approaches to tackling health care associated infections where these are needed?
 4. Are there any current measures that are unnecessary, or could be simplified, in the light of the introduction of these protocols?

4) Summary of Responses

To these four specific questions, the following responses were received:

- *Does the Code of Practice cover sufficiently broad a scope in respect of tackling health care associated infections?*

We gathered 76 specific responses to this question. Of these, **83%** answered, “**Yes**, the Code of Practice does cover a sufficiently broad scope.”

- *Is there sufficient detail and clarity in the Code of Practice in what it requires of service providers?*

We gathered 69 specific responses to this question. Of these, **51%** answered “**Yes**, there is sufficient detail and clarity”.

- *Do the proposals apply sufficient pressure on health care organisations to bring about changes in approaches to tackling health care associated infections where these are needed?*

We gathered 55 specific responses to this question. Of these, **90%** answered “**Yes**, the proposals apply sufficient pressure”.

- *Are there any current measures that are unnecessary, or could be simplified, in the light of the introduction of these protocols?*

We gathered 51 specific responses to this question. Of these, **63%** answered “**No**, there are not any current measures that are unnecessary, or could be simplified, in light of the introduction of these protocols”.

These results are represented in pie chart form in Annex B.

These results signify the broad acceptance of the proposals set out in “Action on Health Care Associated Infections in England” amongst the majority of the respondents.

General Comments:

Although most respondents expressed a general satisfaction in their consultation responses, some respondents had specific concerns in regard to the Code of Practice, which are summarised below:

- Many respondents felt that there is an acute care focus to the draft Code of Practice, and because of this, it lacks clarity and relevance for Primary Care Trusts, General Practices, and community and social care environments.
- Some voiced their concern for the lack of mention of the impact the Code of Practice will have on the independent sector.
- A significant number of respondents raised the issue of resource availability with respect to implementing the procedural change offered in the Code of Practice. Many would prefer that some mention of resource management were included in the Code of Practice.
- Some respondents expressed concern over the use of subjective language such as “adequate” or “appropriate”, as subjective wording can cause uncertainty and prove counterproductive to the purpose of the legislation.
- Some respondents felt that there was a degree of repetition, overlap or confusion in the draft Code of Practice when viewed alongside existing guidance such as ‘Modern Matron’, ‘Saving Lives’ and ‘Winning Ways’.
- There was also concern that some of the guidance set out in the Code of Practice may conflict with other policies that are already in place, such as those relating to bed occupancy. Many felt that the Code of Practice should specify which guidance is meant to take priority.

- The following are the specific areas in which some respondents felt there was not sufficient mention of their relevance within the draft Code of Practice: bed occupancy rates, staffing levels, hospital design, and a clean air environment.
- Many respondents felt that some of the areas mentioned in the Code of Practice warranted more emphasis. These include: surveillance, training and education for all staff, the specifics of a clean environment, staff uniforms, antibiotic prescribing, the importance of staff well-being, and the need for collaboration between all healthcare service providers.
- Many felt that greater clarity was needed with regard to which requirements different service providers are obligated to meet. Some respondents also felt that there was a need for clarification as to how the Code of Practice relates to the Standards for Better Health and the National Minimum Standards. Many voiced their concern that the lines of accountability and responsibility need to be more clearly specified in the Code of Practice.
- There was some worry amongst respondents that the focus of the Code of Practice is overly managerial at the cost of specifics of clinical practice.
- Some of those who participated in the consultation felt that MRSA is slightly overemphasized in the draft Code of Practice.

5) Action on Responses

The following action is being taken in amending the Code of Practice as a result of consultation feedback:

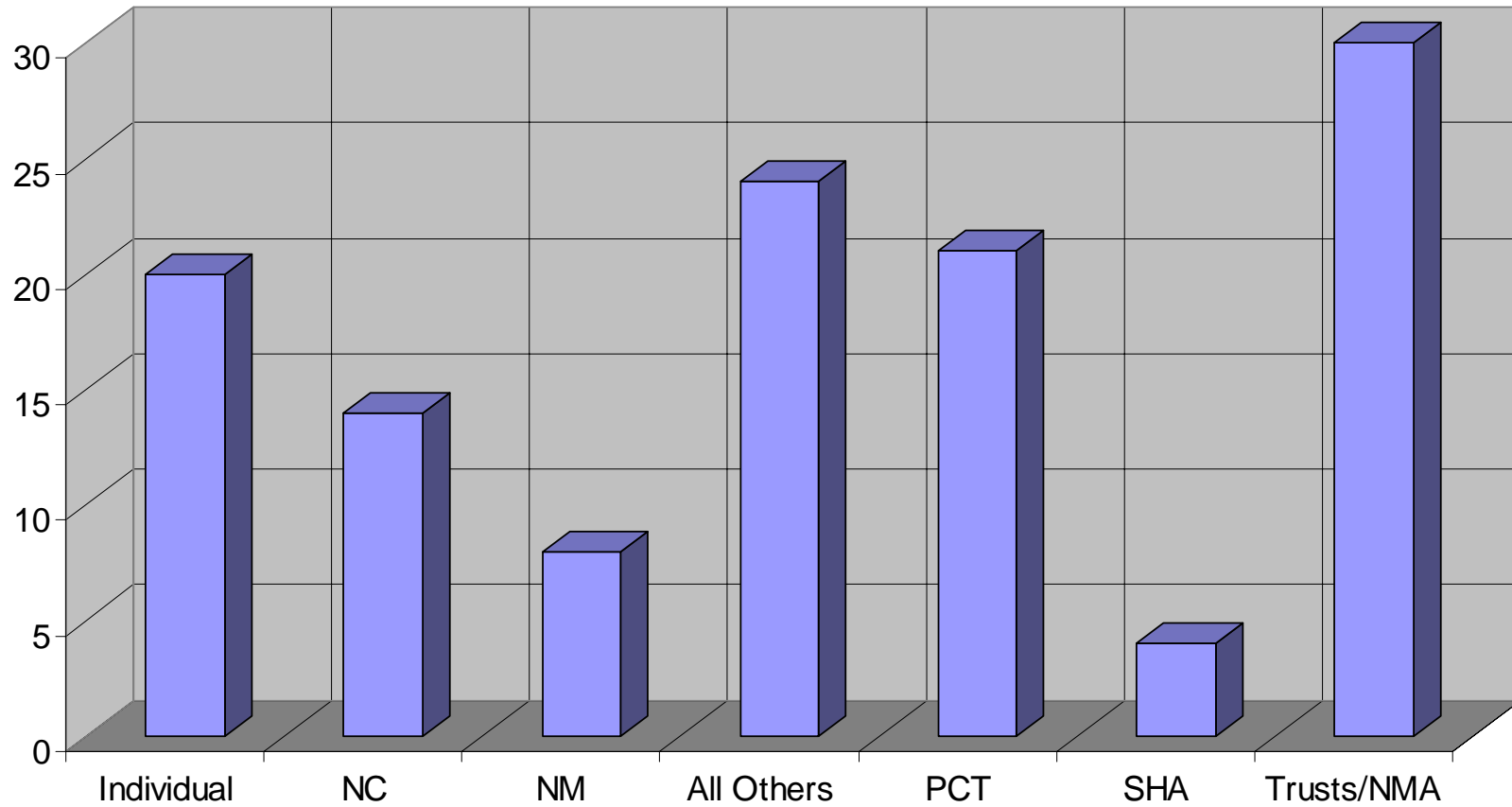
- Provision will be made in the Code of Practice to highlight applicability to non-Acute Trusts and other bodies
- We have improved the identification of priorities
- We have improved signposting to relevant guidance by the use of Annexes
- We have provided an increased focus on outcomes
- We have provided clarification on the relationship of the Code of Practice to existing guidance and programmes such as *Saving Lives*. Please note that work is ongoing on the Code of Practice.

6) Respondents to the Consultation

Please see Annex C below.

Annex A

Classification of Respondents



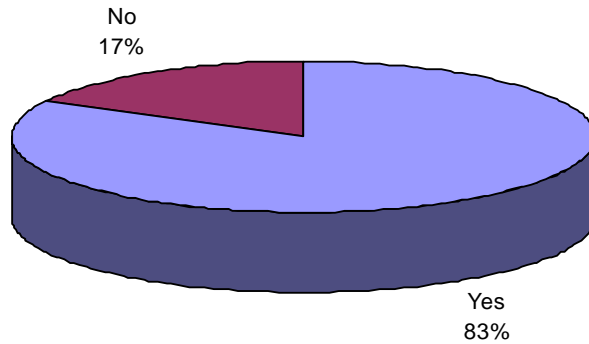
KEY		% of Respondents
Individuals	Individuals	16%
NC	National Clinical Organisation	12%
NM	National NHS Management Organisation	7%
All Others	All Others	20%
PCT	PCT	17%
SHA	SHA	3%
Trusts/NMA	Acute Trusts/Mental Health/Ambulance Trusts	25%

Annex B

Consultation Response Breakdown

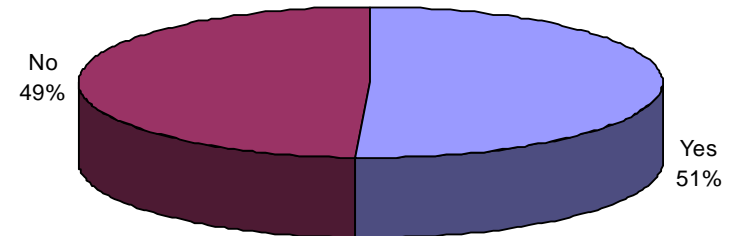
Question One Responses

Does the Code of Practice cover sufficiently broad a scope in respect of tackling health care associated infections?



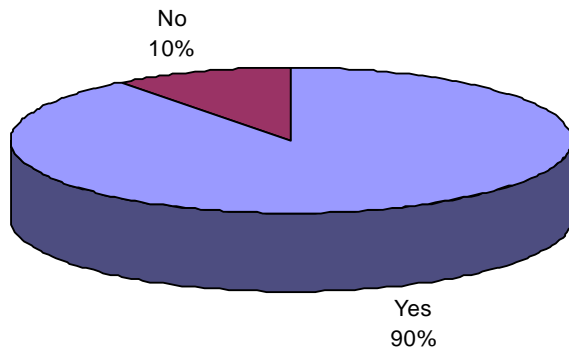
Question Two Responses

Is there sufficient detail & clarity in Code of Practice in what it requires of service providers?



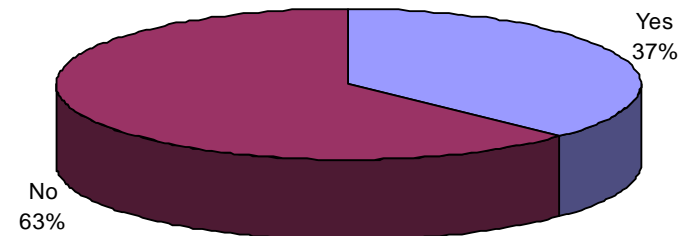
Question Three Responses

Do the proposals apply sufficient pressure on health care organisations to bring about changes in approaches to tackling health care associated infections where these are needed?



Question Four Responses

Are there any current measures that are unnecessary, or could be simplified, in the light of the introduction of these proposals?



Annex C

<u>Title</u>	<u>1st names</u>	<u>Surnames</u>	<u>Organisation</u>
	Sangeeta	Sooriah	Ambulance Service Association
	Susan	Pirie	Association for Perioperative Care
Dr.	Alastair	Robertson	Association of NHS Occupational Physicians
Dr.	Marjory	Greig	Hospital Infection Society
Mr.	Gary	Fereday	NHS Confederation
	Doreen	Leach	Patient & Carer Network of the Royal College of Physicians
Dr.	Maureen	Baker	Royal College of General Practitioners
Mrs.	Jill	Kayley	Royal College of Nursing
	Beverly	Malone	Royal College of Nursing
Dr.	Grace	Smith	Royal College of Pathologists
Dr.	Rodney	Burnham	Royal College of Physicians
	Lesley	Lockhard	Royal College of Physicians of Edinburgh
	Stephen	Thornton	The Health Foundation
	Martyn	Butcher	Tissue Viability Nurses Association
Mr	Rob	Griffin	Food Standards Agency
Dr.	Vicki	King	Health Protection Agency
Sir	Ian	Kennedy	Healthcare Commission
	William	Moyes	Monitor
Mr.	Robert	Warwick	National Blood Service (NBS)
Dr.	Helen	Glenister	National Patient Safety Agency
Mr	Brian	Greener	NHS Connecting for Health
	Jan	Warner	NHS Quality Improvement Scotland
	Sally	Taber	Independent Healthcare Forum
Mr.	Tony	Field	MRSA Support
Mrs.	Mary	Douglas-Jones	Patient & Public Involvement Forum United Bristol Hospitals Healthcare Trust
	Gweneth	Irvine	Anchor Trust
Prof.	Vivienne	Nathanson	BMA
	Tracey	Guest	British Society for Antimicrobial Chemotherapy
	Ann	Mackay	English Community Care Association
	Jean	Curtis	Guild of Healthcare Pharmacists Amicus
Dr.	Paul	Grime	Safer Needles Network
Dr.	CM	Crawshaw	The British Psychological Society
	Christopher	Barry	Achor
	Penny	Harrison	Association of Domestic Management Bevan Brittan LLP
Dr.	Lisa	White	Chiron Biopharmaceuticals GOJO Industries - Europe Ltd
	Michael	Houghton	ICNet Limited
	Bohumil S	Drasar	London School of Hygiene & Tropical Medicine Nabi Biopharmaceuticals Europe Ltd
	James	Ormonde	Scantrack Healthcare Systems (UK) Ltd
Dr.	Gerald	McDonnell	STERIS Ltd
	Murray	Simpson	Textile Services Association
	Holly	Edwards	The Business Services Association UNISON
Dr.	A J	Duggal	Western Sussex PCT Bassetlaw PCT Infection Control Committee
	Alison	Murphy	Bebington & West Wirral PCT, Birkenhead & Wallasey PCT
Dr.	Rachel	Joyce	Bedfordshire Heartlands PCT
	Alison	Fuller	Bradford South & West PCT
	Chris	Sharp	Cambridgeshire & Peterborough PCTs & Mental Health Trusts
Mrs.	Pauline	MacDonald	Dudley South & Dudley Beacon & Castle PCTs
Dr.	Mark	Lambert	Gateshead PCT
	Joanne	Green	Greenwich Teaching PCT
	Keith	Hampton	Havering PCT
	Wendy	Thomas	Newham PCT
	Karen	Martin	North Derbyshire PCTs
Mrs.	Cheryl	Day	North Lincolnshire PCT
	Sue	Williams	North Staffordshire Combined Healthcare & the North & South Stoke PCTs

	Judy	Hillier	Portsmouth City PCT
	Abbie	Malambo	Redbridge NHS PCT
	Tanya	Kidson	Shropshire County & Telford & Wrekin PCT
Mrs.	Elaine	Mullington	Staffordshire Moorlands PCT
Mrs	Linda	Dempster	Swale & Medway Teaching PCT's
Dr.	Catherine	Woodward	Telford & Wrekin PCT
	Caroline	Alexander	Tower Hamlets PCT
Mrs	Eddie	Butterworth	West Lincolnshire PCT
Prof.	Peter	Morgan-Capner	Cumbria & Lancashire SHA
Mrs.	Sally	Casley	North & East Yorkshire & North Lincolnshire SHA
	Caroline	Loudon	North East London SHA
	Jan	Grant	Thames Valley SHA
Mr.	David	Robinson	Bedfordshire & Luton Partnership Trust
	Hayley	Darn	Derbyshire Mental Health Services NHS Trust
	Christina	Campbell	Hereford & Worcester Ambulance Service NHS Trust
Ms.	Cathy	Cairns	Hertfordshire Partnership NHS Trust
Dr.	Damian	Robinson	Newcastle, North Tyneside & Northumberland Mental Health Trust
	James	Birrell	Aintree Hospitals NHS Trust
Mrs.	Elizabeth	Morgan	Birmingham Children's Hospital
Mr.	David	Green	Bradford Teaching Hospitals
	Angela	Thompson	Cambridge University Hospitals NHS Foundation Trust
Mr.	Leslie	Boobis	City Hospitals Sunderland NHS Foundation Trust
	Caroline	Bradley	County Durham & Darlington Acute Hospitals NHS Trust
	Jenny	Kay	Dartford & Gravesham NHS Trust
	Hilary	Bond	Doncaster & Bassetlaw Hospitals NHS Foundation Trust
	Elaine	Strachan-Hall	East Kent Hospitals NHS Trust
	Elizabeth	Robb	East Somerset NHS Trust
	Barbara	Beal	Good Hope Hospital
	David	Tucker	Guy's & St. Thomas' NHS Foundation Trust
Prof.	Kevin	Kerr	Harrogate & District NHS Foundation Trust
	Maurice	Madeo	Hull & East Yorkshire NHS Trust
Prof.	John	Moxham	King's College Hospital
Dr.	Ros	Stansfield	Northumbria Healthcare NHS Trust
	Chris	Wilkinson	Peterborough & Stamford Hospitals NHS Foundation Trust
	Debbie	Flaxman	Queen Mary's Sidcup NHS Trust
	Gerry	Robbins	Royal Surrey County Hospital
Miss	Alison	Smith	Sheffield Teaching Hospitals NHS Foundation Trust
Mrs.	Mandy	Thompson	South of Tyne & Wearside Mental Health NHS Trust, Sunderland, Tyne & Wear
	Tricia	Hart	South Tees Hospital NHS Trust
Ms.	Caroline	Trevithick	University of Leicester NHS Trust
Dr.	May	Kyi	West Middlesex University Hospital
	John	Rostill	Worcestershire Acute Hospitals NHS Trust
Dr	Margaret	Logan	
Dr	James	Nash	
Dr.	Quentin	Sandifer	
	Mark	Wilcox	
Mrs.	Elizabeth	Scanlon	
Ms	Helen	Sinclair	
Dr.	Andrea	Guyot	
Mr	Michael	Parkes	
Mrs.	Rosemary	Gallagher	
	Vicki	Parkin	
Mr	Chris	Fuse	
	Michelle	Mooney	
Ms	Elizabeth	Filby	
Miss	Susan	David	
Prof.	Fenton	Robb	
Dr.	D.	Skan	
Dr.	John	Gray	
	Richard	Steer	
Dr.	Marylyn	Browne	