

The Lead GP
All London GP practices

London Region
Southside
105 Victoria Street
London,
SW1E 6QT
Telephone
Email address

Date: 5th August 2015

Dear Colleague

Re: Advice for practices on Health Care Assistants (HCAs) working in General Practice

Health Care Assistants (HCAs) are a vital and valued part of the general practice nursing workforce. As more activities are being delegated to them, We are writing to you to ensure that practices are aware of their responsibilities when employing health care assistants (HCAs).

Due to the potential impact on the safety of patients, we would like to clarify the position regarding appropriate roles and supervision for HCAs in a General Practice setting.

HCAs are not regulated by a professional body but they have to be accountable for their actions. HCAs should be working under supervision of registered staff who need to be assured that HCAs are competent when delegating activities to their colleagues.

The General Medical Council (GMC) Good Practice Guide on Delegation & Referral; the Nursing & Midwifery Council's (NMC) new 'Code', and the Royal College of Nursing (RCN) all have useful guides on the registered healthcare professional's responsibilities in relation to delegation. Please see Appendices 1, 2 & 3 for the links to these documents.

Principles of Delegation to HCAs for Registered professionals

The principles of delegation and accountability that apply when considering what activities to delegate to HCAs are listed below:

- Registered healthcare professionals such as registered nurses and doctors use their specific knowledge and clinical judgement to assess patients, prescribe, delegate and supervise care. They are accountable for the assessment, planning and evaluation of standards of care, and for delegating work to support staff like HCAs.
- The registered healthcare professional may only delegate an aspect of care to a person who has been appropriately trained and whom they deem competent to perform the activity.
- The registered healthcare professional maintains accountability for the activity delegated and should assure themselves that the person to whom they have delegated fully understands the nature of the delegated activity and what is required of them.
- The HCA will be responsible for accepting to carry out a delegated function and must be clear that he/she should not accept this unless they have received appropriate training and feel comfortable and competent to carry out the activity.
- Where HCAs have nursing activities delegated to them they must be supervised by a

- registered healthcare professional.
- The HCA has a responsibility to follow agreed protocols and must act within these at all times and must not be put in a position where they have to make a stand alone clinical judgement.

Cervical Screening (Sample Taking)

When considering delegation to an HCA, it is useful to determine whether the activity to be delegated is complex, and the plan of care could change 'in the moment' on the basis of clinical judgement. If this is the case, then delegation is not appropriate.

Cervical screening falls into this category as the procedure of 'sample taking' is complex and cannot be performed in isolation. Instead, it should form part of a wider sexual health consultation with a registered healthcare professional, responsive to the patient's own presentation and circumstances. It should therefore be undertaken only by a registered healthcare professional.

This position is consistent with national guidance (Appendix 4) and also specified in the Service Specification for NHS funded cervical screening (Appendix 5)

HCA's undertaking Adult Immunisation

It is good practice for HCAs to administer the influenza, pneumococcal and shingles vaccinations only to adults, provided they are appropriately trained, assessed as competent, and work within set guidelines and protocols. Please see the RCN guidance on this (Appendix 6)

Patient safety is paramount, and must not be compromised in any way. There should therefore be a robust framework for the training of the HCA, as well as clear governance procedures in place. The following principles set out safe parameters for delegating immunisation to an HCA:

- The HCA must be trained in line with nationally agreed minimum training standards, assessed as able to demonstrate competence, knowledge of the current evidence-base and understanding of all aspects of immunisation and can safely administer the vaccines.
- The HCA would need to be able to liaise promptly and discuss issues with a registered health professional, who is available on site.
- The HCA may only administer the immunisation under a Patient Specific Direction (PSD) and may not work under a Patient Group Direction (PGD).
- Adequate indemnity insurance must be arranged for the HCA to perform this activity.

Please see Appendix 7 for useful links on immunisation training for HCSW.

Childhood immunisation

It is also good practice for HCAs to be trained in administering the live attenuated influenza vaccine (LAIV) to children. However, it is not recommended for HCAs to be delegated to administer other vaccines, such as the remainder of the childhood vaccination programme or travel vaccinations. Immunisation schedules are complex, change frequently and require clinical decision making that should be undertaken by a registered healthcare professional. Please refer to Appendix 8 for further information and guidance on this.

We hope the information outlined in this letter is helpful in supporting you to make decision about appropriate roles for HCAs

Please contact Eileen Bryant, Assistant Head of Quality/Regional Lead for Out of Hospital Care on 01138070346, if you would like further information.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'D Sturgeon', written in a cursive style.

David Sturgeon
Director of Primary Care
NHS England, London Region

APPENDICES – Links to documents referred to in the letter

1. http://www.gmc-uk.org/guidance/ethical_guidance/21187.asp
2. <http://www.nmc.org.uk/globalassets/sitedocuments/nmc-publications/revise-new-nmc-code.pdf>
3. http://www.rcn.org.uk/_data/assets/pdf_file/0010/400033/RCN_delegation_information_sheet.pdf
4. <http://www.cancerscreening.nhs.uk/cervical/publications/nhscsp23.pdf>
5. <1516-no25-cervical-screening-programme-final.pdf>
6. http://www.rcn.org.uk/_data/assets/pdf_file/0008/597860/Final_HCSW_Adult_immunisation_paper_revised_Oct2014_V3_2.pdf
7. <https://www.gov.uk/government/publications/immunisation-training-of-healthcare-support-workers-national-minimum-standards-and-core-curriculum>
8. http://www.rcn.org.uk/_data/assets/pdf_file/0009/618318/LAIV-HCSW-paper-revised-2015_final.pdf