



Llywodraeth Cymru
Welsh Government

POLICY AND STRATEGY

All Wales COVID-19 Workforce Risk Assessment Tool: integrated impact assessment

A summary of the effects of the COVID-19 workforce risk assessment tool.

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Section 1: what action is the Welsh Government considering and why?

In narrative form, please describe the issue and the action proposed by the Welsh Government. How have you applied / will you apply the five ways of working in the Well-being of Future Generations (Wales) Act 2015 to the proposed action, throughout the policy and delivery cycle?

Long term

- What long term trends, challenges and opportunities might affect the proposal?
- How does the proposal prevent / mitigate the bad effects in these trends or facilitate / make the most of the good effects?

Prevention

- How does the proposal support the breaking of negative cycles such as poverty, poor health, environmental damage and loss of biodiversity?
- Does the proposal treat a symptom or the underlying cause? If so how? If it treats a symptom, what can be done about the underlying cause?
- How could the proposal minimise its own negative impacts e.g. minimising waste and resource use, emissions and impact on air quality, negative impact on social / community cohesion?

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The Well-being of Future Generations Act stresses our obligation and that of all public bodies in Wales to support the health and well-being of all people and communities in Wales.

“ “A society in which people’s physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood” ”

The COVID-19 pandemic has highlighted and perhaps exacerbated some of the unacceptable health inequalities that exist in the Welsh population. The **Office for National Statistics** (ONS) has analysed the risk of COVID-19 related death in England and Wales and how much variation can be explained by a range of factors. Multiple and complex inter-relationships exist between socioeconomic, geographic and other demographic factors. Controlling for these factors reveals that the risk of death involving the coronavirus (COVID-19) among some ethnic groups is significantly higher than that of those of White ethnicity. ONS data also reveals that men are more likely to die as a result of COVID-19 infection as are people over the age of 65.

The All Wales COVID-19 Workforce Risk Assessment Tool (from here on it will be referred to as the ‘risk assessment tool’ will be immediately implemented by NHS Trusts and Health Boards and across social care. It will be made available to NHS Wales and social care employers in Wales via the **Welsh Government** website and will be marketed via digital media channels. Whilst the risk assessment tool is designed for health and social care, it could be used in other sectors and workplaces in Wales.

The risk assessment tool will have both immediate and long term implications for those individuals who assess their personal risk factors. In the longer term, some people who may have been in harm’s way will have been protected from severe COVID-19 infection or possibility of death. In addition to the immediate action taken, in the longer term individuals will be able to identify and understand lifestyle improvements that if actioned may have longer term effects on their health and wellbeing.

The implementation of the risk assessment tool provides opportunity to connect

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the roll-out of the tool with existing government guidance, the key messages on infection prevention and control, including social distancing, good hand hygiene, appropriate fit and use of PPE where appropriate, and supplementing Vitamin D. This will support and help to influence behaviours likely to enable staff to minimise the chance of contracting COVID-19 at work as well as focus on their risk.

Integration

- How could this proposal connect and contribute to different public policy agendas and generate multiple benefits e.g. how can a transport project support improvements in health, culture or worklessness?
- What practical steps have you taken to integrate your proposal with **Prosperity for All** - our National Strategy, **well-being objectives** and plans, as well as those of other public bodies and Public Service Boards, to maximise the proposal's contribution across the seven well-being goals?

In support of the Healthy and Active pledge set out in Prosperity for All: the national strategy, this proposal will shift our approach from treatment to prevention for at risk individuals in the health and social care workforce. In addition, the proposal will contribute to and promote our well-being objectives around good health for everyone, building healthier communities and promoting healthier lifestyles for future generations.

The proposal also supports the vision of A Healthier Wales: our plan for Health and Social Care in preventing illness and supporting people to manage their own wellbeing. NHS Wales's core values emphasise the importance of providing our staff with the tools, systems and environment to work safely and effectively and this culture should be foundation for the whole health and social care system.

Collaboration

- Who are the partners that have a shared interest in this proposal?
- How have those partners been involved in developing the proposal and planning its delivery, and what contribution will they make to it?

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Involvement

- How have people affected by the proposal been involved in developing it?
- What matters to the people affected by the proposal and how might they be involved in its delivery?

The risk assessment tool has been developed in collaboration with a range of partners who have an interest in the risk assessment tool this includes:

- Health and social care professionals – various representatives of these groups have been involved throughout the development and implementation process of this group. This includes representative of various diversity networks, trade unions and the expert scientific group, of which many work for the NHS, have considered the available evidence on how to best protect these groups of people.
- NHS Wales Directors of Workforce – Directors have had meetings with Welsh Government to discuss COVID-19 related matters, in which they have been provided updates on the status of the tool and have had the opportunity to comment on the tool.
- People with scientific expertise on COVID-19 – To develop this tool a group was set up with a range of professionals including clinicians, researchers and epidemiologists who have scientific expertise on COVID-19, who considered the evidence and decided on the factors that put an individual ‘at risk’ of COVID-19 thus this was used in the tool.
- Social care employers – Social care employers have had the chance to comment on the development of the tool through the social care implementation group. In addition to the above, like other groups, they have also had the opportunity to present evidence for the scientific group to consider.
- Trade unions – who have helped to develop guidance to ensure the tool is implemented correctly. This group has also had the opportunity to present evidence for the scientific experts to consider when making decisions on the creation of the tool.
- Community representatives – various community representatives for Black, Asian and Minority Ethnic (BAME) people have been invited to provide evidence on the risk assessment tool at various stages. Some community

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representatives have also attended the BAME socio economic subgroup, in which the chair of group attends risk assessment sub group. Therefore, representatives of this group in which he has the opportunity to feedback on the tool through the chair.

- First Ministers COVID-19 BAME Advisory Group which includes representation from Local Government; leading clinicians; researchers; epidemiologists; and Equality and Human Rights Commission.

In addition to the five ways of working above, consider the following areas:

Impact

- What are the main arguments for and against the proposal? Please refer to evidence; acknowledge significant gaps in our knowledge and describe any plans to fill them.
- How widely have you explored these arguments through involvement and collaboration?

This proposal will be a key mechanism for health employers and social care employers in Wales, to identify workers who are at higher risk of severe COVID-19 infection and death. The risk assessment tool has been developed by the Risk Assessment Subgroup co-chaired by Professor Keshav Singhal (Consultant Orthopaedic Surgeon CTMUHB and BAPIO Wales) and Helen Arthur (Director of Corporate Business & Workforce, Welsh Government). The risk assessment tool was considered and endorsed by the First Ministers COVID-19 BAME Expert Advisory Group co-chaired by Judge Ray Singh CBE and Dr Heather Payne (Senior Medical Officer for Maternal & Child Health Welsh Government).

The Risk Assessment Subgroup have considered a range of approaches to risk assessment drawing on existing tools in use elsewhere, as well as the wide range of current evidence and numerous further reviews including SAGE papers not currently in the public domain, the ONS Dataset analyses of coronavirus-related deaths by ethnic group, health conditions, and by occupation, released in May, as well as papers from the faculty of Occupational Medicine, the BMA and papers from the United States of America. This evidence has been explored

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along with expert specialist advice from members of the Risk Assessment Sub Group. A summary of the main published evidence is as follows:

- Kings Fund Report
- Institute of Fiscal Studies and Nuffield Foundation
- Ethnicity, The Lancet
- Demographics of Covid 19 in the general population
- Demographics of Covid 19 in Healthcare Sector
- Covid 19 Demographics from across the World
- Vitamin D
- Intangible Factors

The group consisted of leading clinicians and other health professionals in Wales who worked with pace and professionalism conducting a significant amount of analysis of the data between meetings – recognising the urgent need to ensure and safeguard the welfare and well-being of our health and social care workforce. Following this rapid analysis the Subgroup concluded that it is a combination of various factors coming together which contribute to the severity of the infection and the mortality associated with COVID-19. The risk factors identified within the risk assessment tool are identified by the latest COVID-19 Clinical Information Network paper (published on the SAGE website) and the Public Health England analysis published In June.

The proposal has been positively received by Union Partners, NHS Workforce Directors, NHS Wales Employers, The Association of Directors of Social Services (Cymru), Social Care Wales. The Tool was recommended to be made available without delay by Judge Ray Singh Chair of the First Minister's COVID-19 BAME Expert Advisory Group on 20 May 2020. On 22 May 2020, Vaughan Gething MS, Minister for Health and Social Services agreed that the All Wales COVID-19 Workforce Risk Assessment Tool be made available from 27 May, following press briefing and the First Minister's Written Statement.

Costs and Savings

- What will the proposal cost and how will it be funded?
- How might costs be reduced through involvement and collaboration, across

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- Welsh Government and/or with external stakeholders?
- Are there savings and how will these be realised?

The proposal is not intended to be a cost cutting exercise. The continued and overriding priorities are to reduce both the direct and indirect harm from COVID-19. The costs in delivering this proposal are minimal. An estimated £10k will be required for the development of an online version of the risk assessment tool. Around £15k - £20k will be used for marketing - the majority of this will not require additional budget. There may be cost implications for employers in taking the necessary steps to manage and mitigate the risks for their employees. Safeguarding the health and social care workforce in Wales is our priority, by understanding their employees' personal risk of and discussing with their employer, we are supporting employers to meet their duty of care and to take the steps to protect their employees as much as possible.

Mechanism

- Is legislation proposed? If so you will probably need to complete a Regulatory Impact Assessment. You can use the output of this Integrated Impact Assessment to help you.

This proposal fits within existing legislation. This risk assessment tool supports existing strategies and policies of the Welsh Government to tackle inequalities (including health inequalities), social justice, affirmative

Section 7: conclusion

7.1 How have people most likely to be affected by the proposal been involved in developing it?

Not only is it our duty to engage and consult in certain circumstances, but there is clear evidence that involving the public and stakeholders is central to successful policy and delivery. In keeping with the Well-being of Future Generations (Wales) Act 2015, we are committed to involving people. Please

describe how you have involved:

- Children and their representatives;
- People with protected characteristics under the Equality Act 2010;
- Welsh speakers and Welsh language specialist groups; and,
- Other people who may be affected by the proposal.

The work to develop and introduce the COVID-19 Workforce Risk Assessment Tool, arose in the midst of the pandemic when in April growing evidence emerged that COVID-19 infection was having a disproportionate impact on people with Black, Asian, Minority or Ethnic (BAME) backgrounds. Welsh Government took the view that urgent investigation was required to understand the factors involved. In particular, we focused on the immediate need to identify any evidence that enabled us to act in an informed way and do all that we can to minimise avoidable harm in vulnerable groups

Whilst this work has been progressed at a significant pace, this has still been developed in the spirit of social partnership and we continue to work in social partnership to ensure the risk assessment tool is embedded across health and social care.

As COVID-19 has posed an urgent medical matter that posed immediate harm, particularly to health and social care workers there has been no time to directly consult with individual health and social care workers using our typical streams such as having a consultation on the proposals. However, health and social care employer representatives, equality leads, BAME networks and representatives of the First Ministers COVID-19 BAME Expert Advisory Group and representatives of professional bodies have been directly involved in developing the tool (Full details including membership are provided in the Impact section on pages 8-10). In addition to this, Trade Union and other health and social care representatives such as BAME networks and various community representatives have had the opportunity to present evidence for the scientific groups' consideration. A representative from the NHS Wales Equality Leadership Group (ELG) working with Welsh Government officials, Trade Union and NHS Wales representatives, including employers have worked collaboratively to develop the Guidance to accompany the risk assessment tool.

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7.2 What are the most significant impacts, positive and negative?

Summarise the most significant impacts for the people, culture and Welsh language, economy and environment of Wales, expected as a result of the proposed action. Describe the themes that emerged from involving people. Refer to the seven well-being goals and the Welsh Government's well-being objectives. Contrast with the impact of current Welsh Government action if appropriate.

The most significant impact of the All Wales COVID-19 Workforce Risk Assessment Tool is that it identifies health and social care workers who are at greater risk of severe COVID-19 infection or death to protect them from avoidable harm and save lives. Following completion of the self-assessment part of the risk assessment tool the individual should discuss the risks with their line manager to mitigate, manage and minimise these and promote worker safety and wellbeing.

The All Wales COVID-19 Workforce Risk Assessment Tool may further identify vulnerable and at risk staff who need to be redeployed from front line patient facing roles. Therefore, this will need to be accounted for in Health Boards' planning to ensure our health and social care system is as prepared, equipped and resilient as it can be for the weeks and months ahead.

7.3 In light of the impacts identified, how will the proposal:

- maximise contribution to our well-being objectives and the seven well-being goals; and/or,
- avoid, reduce or mitigate any negative impacts?
- What action can the Welsh Government take to promote biodiversity, children's rights, equalities, the Welsh language or another of the areas covered by your impact assessments?
- What action can the Welsh Government take to strengthen its contribution to a particular goal or to contribute to additional goals?
- What action can the Welsh Government take to avoid, reduce or mitigate a

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- negative impact?
- If no action is to be taken to avoid, remedy or mitigate a negative impact then please explain why.

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The COVID-19 pandemic has highlighted some of the unacceptable health inequalities that exist in the Welsh population. This includes putting those from BAME backgrounds and those with certain underlying health conditions as being at risk of severe COVID-19 infection.

The risk assessment tool will be immediately implemented by NHS Trusts and Health Boards and encouraged in social care and other health providers. It has been made available to all healthcare providers in Wales via the Welsh Government internet page and will be widely marketed via digital media channels. Whilst designed for health and social care, the risk assessment tool could adapted to other sectors of work in Wales.

The risk assessment tool will have both immediate and long term implications for those individuals who assess their personal risk factors. In the longer term some people who may have been in harm’s way will have been protected from severe COVID-19 infection or death. In addition to the immediate action taken, individuals will be able to identify and understand lifestyle improvements that if actioned may have longer term benefits on their health.

The implementation of the risk assessment tool provides opportunity to connect the roll-out of the tool with existing government guidance, the key messages on infection prevention and control, including social distancing, good hand hygiene, appropriate fit and use of PPE where appropriate, and supplementing Vitamin D. This will support and help to influence behaviours likely to enable staff to minimise the chance of contracting COVID-19 infection at work as well as focus on their risk.

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The proposal has been introduced to save lives and protect individuals from harm. Therefore, the potential negative impacts are outweighed by the benefits of saving lives.

7.4 How will the impact of the proposal be monitored and evaluated as it progresses and when it concludes?

What plans are in place for post implementation review and evaluation?

The risk tool was first made available on the Welsh Government website in pdf form. The priority was to make the tool available to those who urgently needed to understand their risk and take appropriate action. Monitoring data is therefore not available for most early users of the tool.

An online interactive version of the tool was quickly developed by NHS Wales Shared Services Partnership (NWSSP) with support from HEIW. It is hosted on the national e-learning platform Learning@Wales and is available to anyone working in Wales. All NHS staff are able to access the tool from their individual Electronic Staff Record (ESR).

Summary analysis data from the interactive system is scrutinised weekly by officials and duly considered by the risk assessment sub-group. Qualitative feedback is also encouraged by using the HSS.Covid19.WorkplaceAssessmentSubGroup@gov.wales mailbox.

In the longer term a fuller evaluation will be undertaken. This is likely to be in the early spring of 2021 but is very much dependant on how the COVID-19 situation changes over the winter months. Workforce and OD policy officials have had early discussions with colleagues in Knowledge and Analytical Services to start to consider appropriate methodologies.

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