

1 July 2011

Dr Jeremy McAnulty
Chair
Communicable Diseases Network Australia
GPO Box 9848
CANBERRA ACT 2601

Via email: CDNA.Secretariat@health.gov.au

Dear Dr McAnulty

Re: Consultation paper: CDNA Guidelines for Health Care Workers with Blood Borne Viruses

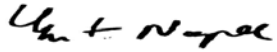
Thank you for the opportunity to provide feedback to the draft CDNA Guidelines. The Scientific Committee of the Australasian College for Emergency Medicine (ACEM) has reviewed the draft and acknowledges the Network's efforts to ensure that the revised guidelines incorporate changes in the health workforce and in the treatment of blood-borne viruses.

The Committee submits the following feedback to the draft guidelines:

- a) The Committee agrees and supports the importance of ensuring that the status and rights of infected Health Care Workers (HCWs) as employees are safeguarded. The Committee further submits that there is a need for strong statements regarding protecting the confidentiality of HCWs, especially when testing, treatment and follow-up is conducted in the HCW's organisation. For example, there must be clear processes in place to ensure that results of a HCW cannot be displayed on computer screens throughout the hospitals, processes to ensure that paper results do not return to the workplace of the HCW, and safeguards built around a HCW's medical record.
- b) The suggestion of annual testing does not appear to be based on any evidence or logic. A HCW can be infected at any time and therefore testing should only be conducted upon commencement of work and when exposed to risk.
- c) The Committee notes that the statement that HCWs and student HCWs should be vaccinated does not take into account situations where a HCW cannot be vaccinated for whatever reason (medical or otherwise).
- d) The prohibition of a HCW who is HIV antibody positive does not seem to be consistent with the evidence (outlined on page 5), which states that the risk to patients of a HCW who is HIV antibody positive but RNA negative is negligible.

Again, thank you for the opportunity to submit feedback to the draft guidelines. If you would like to further discuss the feedback raised in this letter, please don't hesitate to contact me care of jane.macaulay@acem.org.au).

Yours sincerely



DR YUSUF NAGREE
CHAIR, SCIENTIFIC COMMITTEE

