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**From:** **Anne Marie Hoey, Chief People Officer**

**Date:** **26<sup>th</sup> November 2025**

**Subject:** **HR Circular 019/2025 - Integrated guidance on health clearance of healthcare workers and the management of healthcare workers living with bloodborne viruses**

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Dear Colleagues,

The HSE has issued the new '*Integrated guidance on health clearance of healthcare workers and the management of healthcare workers living with bloodborne viruses (hepatitis B, hepatitis C and human immunodeficiency virus (HIV))*'. This document outlines the processes involved in the prevention of transmission of bloodborne viruses (BBVs) and it outlines how healthcare workers living with a BBV can continue to work safely. The guidance focuses solely on prevention of transmission of BBVs from HCWs to patients, to support HCWs living with a BBV to work safely and confidently in healthcare in Ireland. The guidance will come into effect on 26<sup>th</sup> of November and is available at <https://www.hpsc.ie/a-z/bloodbornevirus/>.

HCWs who will carry out Exposure Prone Procedures (EPPs) or who will perform duties involving haemodialysis will require BBV testing and clearance for these roles.

Human Resources and other recruiting services must engage with clinical managers to ensure that roles which may involve EPP or haemodialysis are identified prior to recruitment to ensure appropriate health clearance is carried out by Occupational Health (OH) services.

### Exposure Prone Procedures

This guidance outlines the requirements for HCWs carrying out Exposure Prone Procedures (EPPs)

EPPs are defined by the Irish National Clinical Effectiveness Committee in Guideline 30 on IPC as *'the invasive procedures where there is potential for direct contact between the skin, usually finger or thumb of the healthcare worker and sharp objects or surgical instruments – such as needles, sharp body parts (for example fractured bones) spicules of bone or teeth – in body cavities or in poorly visualised or confined body sites, including the mouth of the patient'*.

Categorisation of procedures undertaken in a clinical service as EPP or non-EPP is the responsibility of the clinical manager/director. The clinical manager/director of the service is required to review the range of procedures undertaken in their service and to identify the HCW roles that will require EPP clearance. In the event of ambiguity of task/role EPP classification, a job function analysis of the role should be conducted and/or advice sought from relevant educational and professional bodies. Infection Prevention and Control may assist, in the case of uncertainty. Table 31 of the NCEC National Clinical Guideline No 30 (<https://www.gov.ie/en/department-of-health/publications/ncec-national-clinical-guideline-ncg-no-30-infection-prevention-and-control-ipc-updates/>) on IPC provides advice on EPPs in specific areas of clinical care as well as general procedures that are not considered to be EPPs. However, it does not encompass all possible EPPs, and healthcare workers must consider the risks in each situation. It is not possible to provide an exhaustive list of what procedures are EPPs or non-EPPs.

Fitness for work of HCWs who are living with a BBV will be based on the monitoring and risk assessment by the OH service in line with the national guidance.

### Introduction of HIV screening

In line with international best practice, HIV screening is now part of the EPP clearance process. The introduction of HIV screening as part of EPP clearance does not apply to HCWs who are already in employment in healthcare facilities, with the exception of those:

- Starting an EPP post for the first time in their career
- Moving to a new post which requires 'EPP clearance', with no previous HIV testing as part of their existing EPP clearance. A new EPP certificate should

then be issued, which will include specifying that the new guidance requirements have been fulfilled.

### Haemodialysis

HCWs who will carry out haemodialysis must be tested for hepatitis B infection prior to commencing this work. Fitness for work of HCWs who are HBsAg positive will be based on the monitoring and risk assessment by the OH service in line with the national guidance.

HCWs carrying out hemodialysis should be immunised for hepatitis B and their response to vaccine checked. Non-responders should have annual testing for hepatitis B surface antigen. Hepatitis B virus non-immune staff should not participate in the dialysis of HBsAg positive patients.

### New Employee Screening

HCWs with no previous EPP clearance who are due to commence work in an EPP role will be required to undergo testing for hepatitis B, hepatitis C and HIV in the Occupational Health service. HCWs who will be performing haemodialysis clinical duties will be required to undergo testing for Hepatitis B infection.

Initial clearance to perform EPP duties requires an Identified and Validated Sample (IVS). The HCW will be required to show a proof of identity with a photograph (either a current driver's licence, or current passport) when the sample is taken.

An EPP certificate of indefinite duration can be issued by OH, authorising a healthcare worker to perform EPPs without the need for periodic re-certification. This indefinite EPP certificate may need to be re-evaluated if there has been a possible exposure to a BBV infection or a risk of reactivation of HBV infection.

### Employee responsibilities

All HCWs are under ethical and legal duties to protect the health and safety of themselves and others, such as colleagues and patients. This includes understanding BBV prevention and cooperating in all health and safety matters.

HCWs who may perform EPPs or haemodialysis clinical duties have an ongoing responsibility to seek advice and/or a BBV test if they believe they may have been exposed to a BBV infection or are at risk of reactivation of HBV infection, regardless of whether this was in an occupational or personal setting.

### Employees living with a BBV

HCWs diagnosed with a BBV will receive appropriate OH advice regarding fitness for work, if relevant, during the health clearance process. The national guidance outlines the ongoing monitoring and fitness for work requirements for a HCW in an EPP role or those performing haemodialysis who is living with hepatitis B, Hepatitis C or HIV.

### Notification of a HCW BBV

The guidance outlines the process to be followed in the event a HCW is newly diagnosed with a BBV. This will involve a risk assessment to assess if there are factors that may indicate a risk of BBV transmission from the HCW to patient.

### Employee confidentiality

There is a legal duty under the Data Protection Act (2018) (<https://www.irishstatutebook.ie/eli/2018/act/7/enacted/en/html>) to preserve the confidentiality of medical information and records. Confidentiality may only be breached in exceptional circumstances, as required by law under the Infectious Diseases Regulations 1981 (<https://www.irishstatutebook.ie/eli/1981/si/390/>) and following discussion with the employee.

### Further information

The preplacement Health assessment form has been updated to reflect the changes in process and is available here - <https://healthservice.hse.ie/staff/benefits-and-services/hr-forms/#hiring>.

All relevant employees should read the guidance in full – see <https://www.hpsc.ie/a-z/bloodbornevirus/>. For further information please contact [hr.wellbeing@hse.ie](mailto:hr.wellbeing@hse.ie).

Yours sincerely



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