

By Email

14<sup>th</sup> December 2020

NHS England  
PO Box 16738  
Redditch  
B97 9PT



Dear NHS England,

**Re: Personal Protective Equipment (PPE)**

I am contacting you with concerns that GMB Union and our members have about the current guidance for the use of Personal Protective Equipment (PPE) in healthcare during the Coronavirus Pandemic (Covid-19). You are receiving this communication as GMB Representatives were informed by Public Health England (PHE) that NHS England were responsible for the use of Personal Protective Equipment (PPE) in clinical settings.

We are almost a year into the Pandemic and well into the second wave and so it is disappointing that we are still hearing from our members on the frontline regarding unsatisfactory access to appropriate PPE to ensure their safety at work.

Government have given assurances that as we continue through the second wave and potential winter crisis, we will not see the same issues we saw at the start of the pandemic, in terms of shortages of supplies. However, we are led to believe that the current stockpiles are very much based on the current guidelines - guidance which we believe still does not afford our members the protection they need despite emerging evidence which would support our call for increased protection. This therefore leads us to believe that decisions regarding what are appropriate levels of PPE are being determined based on stock supplies and not on emerging scientific evidence.

There is now more understanding about Covid-19 and transmission of the virus than there was at the start of the pandemic and we feel as a result the guidance needs to be reviewed and revised. Some points to note:

- There is increasing evidence regarding airborne transmission.

Covid-19 is spread through the air, especially in indoor spaces. Scientists now openly acknowledge the role played by the transmission of aerosols. Due to the overwhelming evidence that airborne transmission is a major transmission route for Covid-19, GMB believes that all Covid-19 patient facing roles should have access to the highest level of PPE e.g. FFP3 masks that have been correctly fit tested. This includes non-clinical staff working in those areas such as porters and cleaners.

- Lack of ventilation and space in many healthcare settings.

The risk of contagion is highest in indoor spaces. Many wards are short of space and ventilation and the emerging evidence now shows that this contributes to the risk of transmission. This includes lifts which are used to transport Covid-19 patients around the hospital. At busy times in some hospitals, at risk patients are left in corridors without being

tested for Covid-19. GMB believes therefore that all Covid-19 patient facing roles should have access to the highest level of PPE (FFP3 masks that have been correctly fit tested). This is necessary for all roles, including porters and cleaners working in those areas.

- Increasing numbers of asymptomatic staff testing positive for Covid-19.

This calls into question whether PPE is fit for purpose if there are so many healthcare staff contracting Covid-19. Higher levels of PPE protection for all staff working in patient facing roles would help to reduce numbers of staff testing positive. This should include first responders and non-clinical staff such as porters and cleaners. As well as access to FFP3 masks, staff should also have access to footwear that can be decontaminated, such as clogs. We have reports of members being unable to access these on Covid-19 wards. The guidance around goggles is also an area of concern as they are to be worn for Aerosol Generating Procedures (AGPs) but not generally, despite the eyes being one of the greatest risks for someone to become infected. Visors which are routinely issued do not cover the eyes sufficiently and protect from airborne transmissions. Hoods or head coverings should also be provided.

- Aerosol Generating Procedures (AGPs)

GMB also still has concerns about the exclusion of chest compressions from the list of AGPs and therefore excluded from access to the highest level of PPE. We have raised this issue continuously since the start of the pandemic and believe that the Resuscitation Council UK Guidance on this should be the one followed by employers rather than PHE guidance which affords lesser protections.

- Insufficient protection with surgical masks.

There is also little evidence to date on the use of surgical masks being effective, other than for droplets and for protection for influenzas. Aerosol research is lacking for Covid-19 and all current research suggests that surgical masks are inadequate for virus aerosol particles such as SARS. Transmission research suggests that speaking will produce particles enough to get through surgical masks. Current guidance states to wear surgical masks and visors for Covid-19 positive patients unless AGPs are being performed. GMB has requested to see any evidence that surgical masks are 100% effective in preventing the transmission and spread of Covid-19. GMB believes that FFP3 masks should be provided for all staff who are providing care or are in close contact with Covid-19 positive patients. This would be to protect staff and patients.

GMB is calling on Public Health England and Government to review and upgrade current PPE guidance to allow Covid-19 patient facing healthcare staff to have access to and be able to wear the highest level of protection. The justification for this is as mentioned above:

- Increasing evidence regarding airborne transmission.
- Lack of ventilation and social distancing space in many healthcare settings.
- Increasing numbers of staff testing positive for Covid-19.
- Incorrect list of what constitutes an Aerosol Generating Procedure.
- Insufficient protection with surgical mask.

GMB has requested that Public Health England works with the Union to review and strengthen the current PPE guidance. We believe that optimal PPE includes full coverage of skin, hair and clothing with items such as: head covers; goggles; FFP3 masks; coveralls or

long-sleeved gowns; shoe coverings; medical grade gloves. We make the same of request of NHS England.

Without adequate PPE, healthcare workers will continue to contract Covid-19 at work and some more of our essential key workers will die.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'R. Harrison', with a long horizontal flourish extending to the right.

Rachel Harrison  
National Officer

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