

ASSOCIATION OF GREATER MANCHESTER LMCS

Dear Colleague

Re: Hepatitis B immunisation for occupational health purposes

The Association of Greater Manchester LMCs (AGMLMCs) recently discussed this issue, as GPs are still being asked to administer Hep B vaccination for occupational health purposes, particularly for healthcare students and nursing agencies.

GPC guidance on this is clear: there is no obligation, under the NHS regulations, for GPs to administer such vaccinations for occupational reasons; and under Health & Safety Legislation, it is the employer who has responsibility for undertaking an occupational health assessment and taking appropriate action, including Hep B immunisation.

The AGMLMCs supports the GPC view that such patients should ideally be referred to the Employer's Occupational Health Department or Medical School in the case of students. However, in practice this is very difficult to achieve, and can jeopardise the doctor/patient relationship, when a patient feels that his employment/study is put at risk, because his GP refuses to provide this service.

Some employers/agencies inform their patients that their GPs may charge the patients for providing this service, **but, under their NHS contracts, GPs are not allowed to charge their NHS patients for the provision of treatment.** A blood test to screen for vaccination status and any subsequent vaccinations deemed necessary, would be defined as treatment and in those circumstances, GPs could not charge their NHS patients. However, GPs can administer Hep B as a private service to non-practice patients and charge accordingly.

The AGMLMCs recommends the following solution to this problem.

Practices could enter into a reciprocal arrangement with a neighbouring practice to refer their NHS patients to the other practice to receive the Hep B vaccinations for occupational reasons, on a private basis. The practices could then charge the patients as they are not on their NHS list. Practices are free to set their fees at a level that recognises the full cost of delivering the service and it is suggested that practices in the reciprocal arrangement agree a fee. This would enable the referring practice to inform their own patients what they will have to pay the neighbouring practice for this service. It is likely that practices already have reciprocal arrangements with neighbouring practices to sign cremation forms, and Hep B could be an extension of this arrangement, as could other vaccinations, such as influenza for "not at risk" patients.

Further information is available in GPC Hep B immunisation for employees at risk – Guidance for GPs, dated August 2005 and updated November 2005.

Please contact your local LMC if you need further advice/clarification.

Yours sincerely,

DR. RANJIT GILL
Chair, AGMLMCs