Reference Number: UHB 055
Version Number: 4

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Number: T4

#### **Clostridium Difficile Procedure**

#### **Introduction and Aim**

Clostridium difficile is a spore-forming organism, found in the gut, which causes disease by toxin production. The spores survive well in the environment, and have been isolated from commodes, toilets, wheelchairs, sinks, linen, floors, bedpans and the hands of staff. Ensuring strict hand hygiene and maintaining a clean environment is therefore essential to prevent spread of this infection.

This organism causes a broad spectrum of enteric diseases in susceptible people, ranging from mild antibiotic-associated diarrhoea to the potentially fatal condition of pseudo-membranous colitis. Hospitalised patients are predisposed to the disease by their underlying illness and receiving antimicrobial prophylaxis or therapy. Those with a history of long-term treatment with broad-spectrum antibiotics and elderly in-patients are at particular risk.

The aim of the procedure is to provide guidance and both prevention and management for *Clostridium difficile* in the clinical area.

#### **Objectives**

- To describe the actions required when a case of *Clostridium difficile* is identified either on admission or subsequently during the patient admission.
- To provide advice on action required during an infectious incident or outbreak situation caused by Clostridium difficile (see also the Infection Control Procedure for Infectious Incidents and Outbreaks).

#### Scope

This procedure applies to all staff in all locations including those with honorary contracts and students on placement at Cardiff and Vale UHB.

Cardiff And Vale UHB accepts its responsibility under the Health and Safety at Work Act etc. 1974 and the Control of Substances Hazardous to Health Regulations 2002, to take all reasonable precautions to prevent exposure to *Clostridium difficile* in patients, staff and other persons working at or using its premises.

In order to prevent the possible spread of *Clostridium difficile* amongst patients and staff it is recognised that the UHB requires a procedural document to ensure effective management of infection. This is especially necessary in the case of an infectious incident/outbreak, as detailed in the UHB Infection Control Procedure for Infectious Incidents and Outbreaks.



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Equality and Health Impact Assessment	An Equality and Health Impact Assessment (EHIA) has been completed and this found there to be no impact.
Documents to read	Hand Hygiene Procedure
alongside this	Decontamination Procedure
Procedure	
Approved by	Infection Prevention & Control Group

Accountable Executive or Clinical Board Director	Director of Nursing
Author(s)	Clinical Nurse Specialist, IPC

#### **Disclaimer**

If the review date of this document has passed please ensure that the version you are using is the most up to date either by contacting the document author or the <a href="Governance Directorate">Governance Directorate</a>.

Summary of reviews/amendments				
Version Number	Date of Review Approved	Date Published	Summary of Amendments	
4	11.07.2018	12.12.2019	Updated document	
3	21.11.2017	01.12.2017	Revised document to update links. Treatment algorithm appendix removed and replaced with a link to UHB micro guide.	
2	07.03.2014	October 2014	Review of procedure	
1	24.05.2011		First procedure	

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#### 1. SUMMARY

- 1.1 Clostridium difficile is an anaerobic bacterium found transiently in the gut of 2-3% of healthy individuals although asymptomatic carriage rates may be as much as 10% in hospitalised patients.
- 1.2 The organism causes enteric diseases ranging from mild antibioticassociated diarrhoea to pseudo-membranous colitis.
- 1.3 Hospitalised patients are predisposed to the disease particularly those aged over 65 years. Previous/current antibiotic therapy is a major risk factor. Patients in hospital may contract the organism through direct contact (either patient-to-patient spread or via environmental contamination).
- 1.4 A patient admitted with known or suspected *Clostridium difficile* infection, or who develops the infection on an open ward, should be placed in a single room, preferably with en-suite facilities and contact precautions implemented.
- 1.5 If there are several affected cases cohorting on a ward may be considered.
- 1.6 Strict compliance of bare below the elbows plus the five moments of hand hygiene with soap and water must be adhered to at all times.
- 1.7 Single rooms (or areas of the ward used for cohorting) must be cleaned twice daily with detergent and a chlorine releasing agent (0.15/1000 parts per million). For example, Actichlor Plus.
- 1.8 Patients may be moved from a cubicle when 48 hours symptom-free and following clinical assessment/referral to Bristol Stool Chart.
- 1.9 For treatment see the Health Board's Good Prescribing Guide or consult the microguide app available for smartphones where all the latest antimicrobial guidance for C&V UHB can be accessed:
  - http://microguide.horizonsp.co.uk/viewer/cavuhb/adult (guidelines for EMPIRICAL TREATMENT- Gastrointestinal Clostridium Difficile Associated Diarrhoea/CDAD).
- 1.10 All concurrent antibiotics should be stopped if possible or changed to a regimen less likely to cause *Clostridium difficile* infection; the narrower the spectrum of antibiotic cover the less will be the modification of protective bowel flora.

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#### 2. ROLES AND RESPONSIBILTIES

- 2.1 Cardiff and Vale UHB Board is responsible for the approval of the Infection Control Procedure and for the management of patients known or suspected to have *Clostridium difficile* infection.
- 2.2 Individual directorates will be responsible for the implementation of the procedural document in clinical areas.
- 2.3 Distribution of the procedural document will be through the UHB intranet site.

#### 3. CONTROL MEASURES

#### 3.1 Admission of a known or suspected case

3.1.1 As with all other cases associated with infectious diarrhoea, a patient with known or suspected *Clostridium difficile* infection transferred from another ward or hospital should be admitted directly to a single room. Contact precautions (see Appendix 1) must be implemented immediately along with strict hand hygiene with soap and water no single room is available, then the patient should be admitted next to a sink, or as close as possible to one, in the most appropriate part of the ward.

#### 3.2 Case reported after admission

- 3.2.2 A patient who has not been isolated should be moved into a single room (preferably with toilet facilities) as soon as possible and contact precautions implemented immediately. The vacated area should then be cleaned. This will include an enhanced clean with detergent and a chlorine releasing agent. In addition, where possible, a Hydrogen Peroxide Vapour (HPV) clean should also be implemented. Curtains are also to be changed. (see Decontamination Procedure/9.3 for intranet link).
- 3.3 If over a period of time a ward or unit notices a number of cases of *Clostridium difficile* infections, it should be considered to be a period of increased incidence (PII) or possibly an outbreak.
- 3.4 The IP&C team will contact the ward area if patterns of increased incidence are noted, but ward staff may have suspicions of a problem before all test results are available. Please contact IP&C to raise concerns and use the period of increased incidence pack available on the website-

http://nww.cardiffandvale.wales.nhs.uk/portal/page? pageid=253,109318508,253 109318509& dad=portal&schema=PORTAL

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#### 3.5 Case Definition

- 3.5.1. A case of Clostridium difficile is defined as: one episode of diarrhoea, according to the Bristol Stool Chart types 5–7, that is not attributable to any other cause, including medicines, and that occurs at the same time as a positive toxin assay and/or endoscopic evidence of pseudomembranous colitis (PMC).
- 3.5.2 When a case is confirmed the IP&C team will alert the clinical team and ward manager responsible for the patient to inform them and trigger a root cause analysis review of the case. An RCA tool designed for the purpose of reviewing cases of *Clostridium difficile* is available on the IP&C C&V UHB intranet site, follow link below:

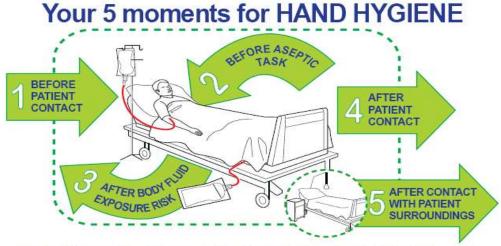
http://nww.cardiffandvale.wales.nhs.uk/portal/page? pageid=253,134499510,253 134499517& dad=portal& schema=PORTAL

#### 3.6 Patient isolation

- 3.6.1 Contact precautions must be commenced immediately. A single room preferably with its own toilet facilities should be used. If no toilet facilities are available then use a designated commode. If there are several affected patients, the IP&C Team will consider the cohorting of patients, as grouping these patients in an individual ward with designated staff is preferable to side-rooms of different wards. Contact precautions must be of the same standard whether the patient is in a cubicle or a ward area.
- 3.6.2 Visitors and members of staff from other departments should report to the Nurse-in-Charge before entering the room.
- 3.6.3 The door of the room should be kept closed at all times unless the clinical need of the patient dictates otherwise.
- 3.6.4 A contact isolation sign (Appendix 1) must be displayed on the door.
- 3.6.5 Patients should not leave the room/ward area to attend other departments without prior arrangement/notification of the receiving department. Further advice can be sought from the IP&C Team.
- 3.6.6 Gloves and apron must be worn when in contact with the patient's immediate environment or if there is any risk of contamination from infected materials. These must be removed after each contact episode and hands washed with soap and water. Plastic aprons must be worn when in contact with the patient or patient's environment.
- 3.6.7 Masks are not required.

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- 3.6.8 Hands must be washed with soap and water. Hand hygiene should be performed:
  - Before entering a single room
  - Before and after contact with the patient and environment
  - After contact with potentially infected materials/removal of gloves
  - Before leaving the room



Based on WHO poster 'Your 5 Moments for Hand Hygiene' and reproduced with their kind permission

See Cardiff and Vale UHB Procedure for Hand Hygiene (see 9.2 for intranet link)

- 3.6.9 Patient notes must be kept outside the single room.
- 3.6.10 Where possible, use of dedicated equipment for the affected patient is preferable e.g. BP cuff, commode etc.
- 3.7 Prevention of spread
- 3.7.1 All visiting staff from other wards or departments, plus patients visitors, should enter the room only after discussion with the nurse-in-charge of the ward.
- 3.7.2 There is no need for the patient to be issued with disposable cutlery and crockery whilst in isolation.
- 3.8 Disposal of waste
- 3.8.1 All infected clinical waste should be disposed of into an infected (orange) "clinical waste" bag (HTM 07-01 Safe Management of Healthcare Waste 2006).

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#### 3.9 Decontamination

- 3.9.1 The patient's room, including the floor and all horizontal surfaces, must be cleaned twice daily and on discharge using a combined detergent and chlorine releasing agent at 0.1% (1,000 parts per million) or a product with detergent and chlorine combined. It is not necessary to clean the walls and ceilings unless soiled. The room should be allowed to dry thoroughly after cleaning/decontamination, ensuring a contact time of at least 10 minutes. Following this where possible, a HPV clean should be implemented before admission of another patient. Bedside or window curtains should be changed after discharge. (See Decontamination Procedure 2016, 9.3).
- 3.9.2 Bed linen must be placed into an alginate bag, then into either a red plastic bag (printed INFECTED), or into a red canvas style bag, which should be sealed, and left for collection.

#### 3.10 Transfer of patients

3.10.1 The ward manager has the responsibility to ensure that the necessary information regarding an infected patient is passed on to a senior member of staff of the receiving ward/department prior to transfer.

#### 3.11 Death of a patient

- 3.11.1 If a patient dies of Clostridium difficile disease this MUST be documented in part 1 of the death certificate and reported to the Clinical Board Management team for reporting as a Serious Incident to Welsh Government. If a patient dies when still symptomatic with Clostridium difficile or on treatment, but whose main cause of death is deemed to have been unrelated, the Clostridium difficile should be recorded in part 2 of the death certificate and should also be considered for reporting as a serious incident to Welsh Government. Clarification was received from Welsh Government June 2013 "a serious incident must be reported for any death where a healthcare associated infection (including Clostridium difficile and methicillin resistant Staphylococcus aureus) is mentioned on the death certificate as either the underlying cause of death or contributory factor". (Putting things Right WG November 2013)
- 3.10.2 Following a patient death, contact precautions are to be maintained. Mortuary staff must be informed, prior to patient transfer, so that they can also adhere to the correct precautions.

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#### 4. TESTING FOR CLOSTRIDIUM DIFFICILE INFECTION

- 4.1 If a patient is admitted with or develops diarrhoea (Bristol stool chart 5 7) and there is no other clear cause for the diarrhoea, such as known inflammatory bowel disease or a good outcome following the use of laxatives, a sample of the diarrhoeal stool should be sent to the laboratory for *Clostridium difficile* testing.
- 4.2 Microbiological testing for *Clostridium difficile* infection is routinely carried out on liquid faecal samples (Bristol stool chart type 5-7) sent to the laboratory from in-patients. Faecal samples from children under 2 years of age are <u>not</u> routinely tested for *Clostridium difficile*.
- 4.3 Repeat samples from a patient who has had a positive sample within the previous 28 days will not normally be tested. Any requests for such testing should be discussed with the medical microbiologists.
- 4.4 Patients may be moved from isolation facilities when they have a formed stool (Bristol stool chart types 1 4) and no diarrhoea for 48 hours. Assessment of clinical symptoms is sufficient to deem a patient non infectious, **no further stool samples to obtain a negative result** are required.
- 4.5 All positive samples are typed. If strains of *Clostridium difficile* have the same type are suggestive of cross infection between patients or from a common environment to patient it can support the investigation of outbreaks and help identify where interventions are needed

#### 4.6 GDH +ve, Toxin –ve

4.6.1 There can be Clostridium *difficile* results that indicate the presence of the *Clostridium difficile* bacteria in the gut but the negative toxin result indicates that this may be colonisation rather than infection. In this instance, it is important to continue observation and assessment of clinical symptoms with repeat sampling and treatment following discussion between the medical team and microbiology.

#### 5. TREATMENT FOR CLOSTRIDIUM DIFFICILE INFECTION

#### **Adults**

5.1 Prompt management of the condition is necessary to reduce symptoms/prevent progression to more serious illness, to reduce further environmental contamination and the potential for cross-infection including outbreaks.

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- 5.2 Stop all current antibiotics if possible and consider the use of any prescribed PPI's. Otherwise, consider changing the current regime to an antibiotic regimen less likely to cause *Clostridium difficile* infection e.g. step down to a narrower spectrum of cover. No further action may be required in mild cases. This should be discussed with a medical microbiologist.
- 5.3 For treatment see the Health Board's Good Prescribing Guide or consult the microguide app available for smartphones where all the latest antimicrobial guidance for C&V UHB can be accessed:

http://microguide.horizonsp.co.uk/viewer/cavuhb/adult

(guidelines for EMPIRICAL TREATMENT- Gastrointestinal – Clostridium Difficile Associated Diarrhoea/CDAD).

- 5.4 The use of anti-motility agents is generally not recommended in severe cases of *Clostridium difficile* diarrhoea. If necessary consult with a gastroenterologist.
- 5.5 Most presumed relapses of *Clostridium difficile* diarrhoea are in fact reinfections with the same or different strain of the organism, and this should not require a change in antibiotic therapy. Treatment of recurrent relapses should be discussed with gastroenterology or microbiological staff.
- 5.6 Severe disease (including pseudo-membranous colitis) can be fatal and may require consultation amongst medical, surgical and microbiological staff.

#### **Paediatrics**

5.7 Clostridium difficile is relatively an uncommon condition in the paediatric population, and hence, treatment should be discussed with a Microbiologist on a case to case basis

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#### 6. RESOURCES

6.1 The necessary resources for the management, training, risk assessments, monitoring and auditing of *Clostridium difficile* infections are already in place and the implementation of this procedure will not entail additional expenditure.

#### 7. TRAINING

- 7.1 Mandatory Infection and Prevention and Control training updated every three years.
- 7.2 Further departmental based training as identified by training needs analysis.

#### 8. IMPLEMENTATION

8.1 The document will be available on the UHB intranet site and the Infection Prevention and Control clinical portal. Individual directorates will be responsible for the implementation of the procedure document in clinical areas.

#### 9. FURTHER INFORMATION

- 9.1 Revised guidelines for the control of *Clostridium difficile* infection were released in 2013 by the Department of Health. The advice given in this procedure takes into account the revised guidance and local circumstances within Cardiff and Vale UHB.
- 9.2 Hand Hygiene Procedure, 2017

http://www.cardiffandvaleuhb.wales.nhs.uk/sitesplus/documents/1143/Hand% 20Hygiene%20Procedure%202017%20%282%29.pdf

9.3 Decontamination Procedure, 2016

http://nww.cardiffandvale.wales.nhs.uk/pls/portal/docs/PAGE/POLICY\_PAGEGROUP/OTHER\_DOCS/DECONTAMINATION%20PROCEDURE%20FINAL\_0.PDF

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#### 10. EQUALITY

10.1 This procedure has had an equality impact assessment and has shown there has been no adverse effect or discrimination made on any particular or individual group.

#### **11. AUDIT**

11.1 Audit of compliance with the procedural document, will be carried out by the Infection Prevention and Control Department, as part of their procedural audit programme.

#### 12. REVIEW

12.1 This procedure will be reviewed every three years or sooner if the national guidelines are updated.

#### 13. REFERENCES

- 13.1 Clostridium difficile infection: How to deal with the problem. Department of Health and Health Protection Agency England 2013. <a href="https://www.gov.uk/government/publications/clostridium-difficile-infection-guidance-on-management-and-treatment">https://www.gov.uk/government/publications/clostridium-difficile-infection-guidance-on-management-and-treatment</a>
- 13.2 Updated guidance on the management and treatment of *Clostridium difficile* infection. Public Health England, June 2013
  <a href="http://www.hpa.org.uk/webc/HPAwebFile/HPAweb\_C/1317138914904">http://www.hpa.org.uk/webc/HPAwebFile/HPAweb\_C/1317138914904</a>
- 13.3 Putting things right: Guidance on dealing with concerns about the NHS from 1<sup>st</sup> April 2011, version 3 November 2013 Welsh Government <a href="http://www.wales.nhs.uk/sites3/Documents/932/Healthcare%20Quality%20-%20Guidance%20-%20Dealing%20with%20concerns%20about%20the%20NHS%20-%20Version%203%20-%20CLEAN%20VERSION%20%20-%2020140122.pdf">http://www.wales.nhs.uk/sites3/Documents/932/Healthcare%20Quality%20-%20Guidance%20-%20Dealing%20with%20concerns%20about%20the%20NHS%20-%20Version%203%20-%20CLEAN%20VERSION%20%20-%2020140122.pdf</a>
- 13.4. Toxin production by an emerging strain of *Clostridium difficile* associated with outbreaks of severe disease in North America and Europe. Lancet; 366: 1079 1083, Sept 2005
- 13.5 HTM 07-01. Safe Management of Healthcare Waste 2006
- 13.6 Health and Safety at Work etc Act 1974.
- 13.7 Control of Substances Hazardous to Health Regulations 2002, SI 2002 No 2677, HMSO

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#### **APPENDIX 1**

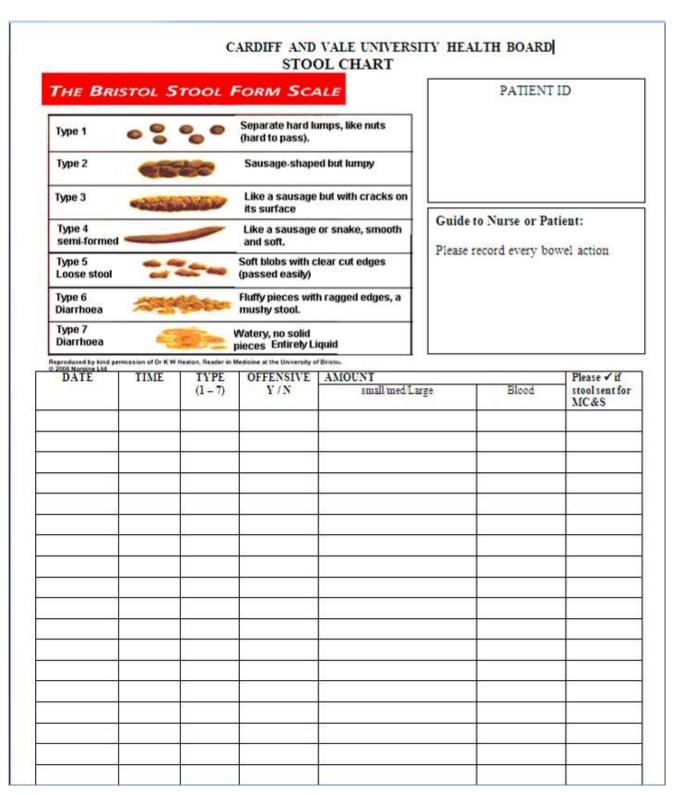


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#### **APPENDIX 2**



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#### **Equality & Health Impact Assessment for**

# INFECTION CONTROL PROCEDURE FOR THE MANAGEMENT OF PATIENTS KNOWN OR SUSPECTED TO HAVE CLOSTRIDIUM DIFFICILE INFECTION

1	Title	Infection Prevention and Control Procedure for the management of patients known or suspected to have Clostridium Difficile Infection. Reference UHB 055
2	Name of Corporate Directorate and title of lead member of staff, including contact details	Clinical Nurse Specialists, Infection Prevention and Control (ext 46703), Corporate Directorate
3	Objectives of strategy/ policy/ plan/ procedure/ service	The objectives of this policy are to provide all staff working within Cardiff and Vale UHB with a comprehensive understanding of the management of patients with confirmed (or suspected) Clostridium Difficile.
4	Evidence and background information considered.	Cardiff and Vale University Health Board Healthcare Associated Infection (HCAI) Surveillance Reports (up to Sept 2016) <a href="http://howis.wales.nhs.uk/sites3/page.cfm?orgid=379&amp;pid=21720">http://howis.wales.nhs.uk/sites3/page.cfm?orgid=379&amp;pid=21720</a> 2017/18 Reduction Targets for Clostridium Difficile, MRSA/MSSA bacteraemia and E Coli bacteraemia. <a href="http://www.wales.nhs.uk/sites3/page.cfm?orgid=379&amp;pid=67899">http://www.wales.nhs.uk/sites3/page.cfm?orgid=379&amp;pid=67899</a>
5	Who will be affected by the strategy/ policy/ plan/ procedure/ service	This procedure applies to all UHB staff involved with the care of patients who may have suspected or confirmed Clostridium Difficile infection.

### 6. EQIA / How will the strategy, policy, plan, procedure and/or service impact on people?

Questions in this section relate to the impact on people on the basis of their 'protected characteristics'. Specific alignment with the 7 goals of the Well-being of Future Generations (Wales) Act 2015 is included against the relevant sections.

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How will the strategy, policy, plan, procedure and/or service impact on:-	Potential positive and/or negative impacts	Recommendations for improvement/ mitigation	Action taken by Clinical Board / Corporate Directorate. Make reference to where the mitigation is included in the document, as appropriate
6.1 Age	No evidence to suggest a positive or negative impact on any age group.	N/A	N/A
6.2 Persons with a disability as defined in the Equality Act 2010 Those with physical impairments, learning disability, sensory loss or impairment, mental health conditions, long-term medical conditions such as diabetes	No evidence to suggest a positive or negative impact on any age group.	N/A	N/A
6.3 People of different genders: Consider men, women, people undergoing gender reassignment	No evidence to suggest a positive or negative impact on people of different genders.	N/A	N/A
6.4 People who are married or who have a civil partner.	No evidence to suggest a positive or negative impact on people who are married or have a civil partner.	N/A	N/A
6.5 Women who are expecting a baby, who are on a break from work	No evidence to suggest a positive or negative impact on women who are	N/A	N/A

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How will the strategy, policy, plan, procedure and/or service impact on:-	Potential positive and/or negative impacts	Recommendations for improvement/ mitigation	Action taken by Clinical Board / Corporate Directorate. Make reference to where the mitigation is included in the document, as appropriate
after having a baby, or who are breastfeeding.	pregnant, maternity leave or breastfeeding.		
6.6 People of a different race, nationality, colour, culture or ethnic origin including non-English speakers, gypsies/travellers, migrant workers	No evidence to suggest a positive or negative impact on different races, nationalities, colour, culture or ethnic origin.	N/A	N/A
6.7 People with a religion or belief or with no religion or belief. The term 'religion' includes a religious or philosophical belief	No evidence to suggest a positive or negative impact on people with/without a religious belief.	N/A	N/A
6.8 People who are attracted to other people of:  • the opposite sex (heterosexual);  • the same sex (lesbian or gay);  • both sexes (bisexual)	No evidence to suggest a positive or negative impact on a person who is heterosexual/bisexual/ lesbian or gay.	N/A	N/A
6.9 People who communicate using the Welsh language in terms of	No evidence to suggest a positive or negative impact on people who use the Welsh language.	N/A	N/A

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How will the strategy, policy, plan, procedure and/or service impact on:-	Potential positive and/or negative impacts	Recommendations for improvement/ mitigation	Action taken by Clinical Board / Corporate Directorate. Make reference to where the mitigation is included in the document, as appropriate
correspondence, information leaflets, or service plans and design			
6.10 People according to their income related group:	No evidence to suggest a positive or negative impact on people according to their income.	N/A	N/A
6.11 People according to where they live:	No evidence to suggest a positive or negative impact on people according to where they live.	N/A	N/A
6.12 Consider any other groups and risk factors relevant to this strategy, policy, plan, procedure and/or service	N/A	N/A	N/A

# 7. HIA / How will the strategy, policy, plan, procedure and/or service impact on the health and well-being of our population and help address inequalities in health?

Questions in this section relate to the impact on the overall health of individual people and on the impact on our population. Specific alignment with the 7 goals of the Wellbeing of Future Generations (Wales) Act 2015 is included against the relevant sections.

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How will the strategy, policy, plan, procedure and/or service impact on:-	Potential positive and/or negative impacts and any particular groups affected	Recommendations for improvement/ mitigation	Action taken by Clinical Board / Corporate Directorate Make reference to where the mitigation is included in the document, as appropriate
7.1 People being able to access the service offered:	Appears to not have any impact.		
7.2 People being able to improve /maintain healthy lifestyles:	Appears to not have any impact.		
7.3 People in terms of their income and employment status:	Appears to not have any impact.		
7.4 People in terms of their use of the physical environment:	Appears to not have any impact.		
7.5 People in terms of social and community influences on their health:	Appears to not have any impact.		
7.6 People in terms of macro-economic, environmental and sustainability factors: Consider the impact of government policies; gross domestic product; economic development; biological diversity; climate	Appears to not have any impact.		
Well-being Goal – A			10

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Approved By:		

How will the strategy, policy, plan, procedure and/or service impact on:-	Potential positive and/or negative impacts and any particular groups affected	Recommendations for improvement/ mitigation	Action taken by Clinical Board / Corporate Directorate Make reference to where the mitigation is included in the document, as appropriate
globally responsible Wales			

## Please answer question 8.1 following the completion of the EHIA and complete the action plan

8.1 Please summarise the potential positive and/or negative impacts of the strategy, policy, plan or service	Positive impacts from this procedure are that all staff across C&V UHB would have the ability to manage any suspected or confirmed Clostridium Difficile infection, in an appropriate and timely manner. It would also ensure that high standards of care are achieved.
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#### **Action Plan for Mitigation / Improvement and Implementation**

	Action	Lead	Timescale	Action taken by Clinical Board / Corporate Directorate
8.2 What are the key actions identified as a result of completing the EHIA?	There are no significant impacts to note.			
8.3 Is a more comprehensive Equalities Impact Assessment or Health Impact Assessment required?	No.			
8.4 What are the next steps?				