

**Reference:** FOI.ICB-2526/306

**Subject:** Policies and Guidance Concerning “bare below the elbows” for Healthcare Staff

*I can confirm that the ICB does hold some of the information requested; please see responses below:*

QUESTION	RESPONSE
Please provide the following information relating to your Integrated Care Board’s (ICB’s) policies and guidance concerning the “bare below the elbows” approach or any equivalent dress-code policies for healthcare staff:	
<p><b>1. Policies and Guidance</b></p> <p>Please supply the current version of any formal policies, protocols, guidance documents, or standards issued by the ICB relating to:</p> <ul style="list-style-type: none"> <li>i. “Bare below the elbows”</li> <li>ii. Infection prevention dress-code requirements</li> <li>iii. Clinical or non-clinical staff attire expectations</li> <li>iv. Any occupational health or safety requirements related to staff appearance or uniform</li> </ul>	<p>The NIPCM (National Infection Prevention and Control Manual) has been adapted for use within England to support and facilitate healthcare providers to demonstrate compliance with the ten criteria of the ‘Health and Social Care Act 2008, <a href="#">Code of practice on the prevention and control of infections and related guidance</a>. We added these requirements of the code to all partner organisation/s contracting quality schedules in the contracting round earlier in the year (including revised/new primary care contracts).</p> <p>More information can be found here: <a href="#">NHS England » National infection prevention and control manual (NIPCM) for England</a></p>
<p><b>2. Scope and Application</b></p> <p>Please clarify whether these policies apply to:</p> <ul style="list-style-type: none"> <li>i. All staff within the ICB</li> <li>ii. Staff working in provider organisations commissioned by the ICB</li> </ul>	<p>Chapter 1 has ten elements of standard infection control precautions (SICPs) which include PPE (including staff attire/dress-code requirements including headwear and foot wear);</p>

<p>iii. Primary care (GP practices), community providers, or other contracted services</p>	<p>1.1 Patient Placement/Assessment for infection risk</p> <p>1.2 Hand Hygiene</p> <p>1.3 Respiratory and Cough Hygiene</p> <p>1.4 Personal Protective Equipment</p> <p>1.5 Safe Management of Care Equipment</p> <p>1.6 Safe Management of Care Environment</p> <p>1.7 Safe Management of Linen</p> <p>1.8 Safe Management of Blood and Body Fluid Spillages</p> <p>1.9 Safe Disposal of Waste (including sharps)</p> <p>1.10 Occupational Safety: Prevention and Exposure Management (including sharps)</p>
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<p><b>3. Implementation and Compliance</b></p> <p>Does the ICB require, monitor, or enforce provider compliance with 'bare below the elbows'/dress-code expectations as part of:</p> <ul style="list-style-type: none"> <li>i. Commissioning contracts?</li> <li>ii. Quality schedules (e.g., infection prevention requirements)?</li> <li>iii. Assurance frameworks?</li> </ul>	<p>The partner organisations BNSSG ICB commissions are accountable for implementing the NIPCM and have systems in place to provide adherence/assurance to their board/s. BNSSG ICB commissions contracts which include IPC quality measures as part of the quality schedule. These measures include reference to the NIPCM, but the ICB does not directly monitor or enforce contractual compliance of NIPCM (including BBE and dress code requirements).</p>
<p><b>4. Exemptions or Adjustments</b></p> <p>Please provide any guidance you hold on:</p> <ul style="list-style-type: none"> <li>i. Exemptions or reasonable adjustments for cultural, religious, or clinical reasons</li> <li>ii. How exemptions are assessed or approved</li> </ul>	<p>Any exemptions or reasonable adjustment conditions would be held by individual providers locally.</p>
<p><b>5. Changes Since 2020</b></p> <p>Have there been changes to these policies since 1 January 2020? If yes, please provide:</p> <ul style="list-style-type: none"> <li>i. The dates of changes</li> <li>ii. A brief description of what changed</li> <li>iii. Any archived versions of the policy still held by the ICB</li> </ul>	<p>And changes since 2020 can be found here: <a href="#">NHS England » Version history</a></p>

***The information provided in this response is accurate as of 11 December 2025 and has been approved for release by Rosi Shepherd, Chief Nursing Officer for NHS Bristol, North Somerset and South Gloucestershire ICB.***