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**PILTON  
 COMMUNITY**  
 health project

**Barri Grubb Food Project  
 Pilton Counselling Service  
 Women Supporting Women**

6 June 2005

I write on behalf of the North Edinburgh Social Inclusion Partnership Health & Social Care Group (H&SCG), a multi-agency group that oversees health related work in the SIP's area. The H&SCG wished to respond to the consultation document: Blood testing following criminal incidents where there is a risk of infection.

The H&SCG was concerned by the proposals, such as mandatory testing and allowing police (and others) the right to apply for information on the infection status of those who may be charged with a criminal offence. The issue is an important one and the Group very much recognises that workers, including police officers, have the right to be protected as effectively as possible from the risk of infection and the anxiety this risk brings. However, the H&SCG does not feel that these proposals achieve that end. They are not evidence based and do not address significant issues - for example, Post Exposure Prophylaxis (PEP) has to be administered quickly, long before tests can be available and so decisions about PEP would still have to be made without test results.

There are significant civil liberty concerns about the proposals as they stand, for example, the suspect's right to confidentiality. These issues cannot be dismissed by the response that the need for the proposals outweighs concerns, particularly as these specific proposals are not necessary. Importantly, General Medical Council guidelines already allow access to medical records when there is a risk of harm or death, which would cover most instances. Also, the risk of occupational infection is very low and there are alternative procedures being used by other worker, such as those for health care staff.

Overall, it seemed to members of the H&SCG that the best defence against occupational infection are strong health and safety procedures and training and we support HIV Scotland's suggestion that it would be more effective to work in collaboration with experts in HIV and related matters to develop alternative approaches as well as robust protocols and guidelines for police and other frontline workers, so that they can be aware of how best to keep themselves safe. These are more positive responses than over-reliance on testing. The H&SCG does not therefore support the proposals as they stand.

Yours sincerely

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 Chair, H&SCG

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