Outbreak of TB in Llwynhendy: External Review Recommendations PHW ACTION PLAN

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General response

Public Health Wales (PHW) welcomes the findings of the independent review into the response to the outbreak of Tuberculosis (TB) centred around Llwynhendy, Carmarthenshire. PHW accepts the recommendations of the review in full and we have developed this action plan (jointly with Hywel Dda University Health Board) to address these.

We recognise the challenges outlined by the review of working across systems to effectively manage outbreaks of TB. Such outbreaks are complex because of the elaborate social networks and often extended timescales involved, resulting in cases presenting many months or indeed years later. Reflecting back over a decade, it is encouraging that the review has identified the progress and organisational learning over recent years in our approach to managing the outbreak, whilst also recognising there is scope for further development.

The findings of the review are a fair reflection of the ongoing need to ensure safe clinical services, public health leadership, and strategic direction through government policy for the management of TB in Wales. As such, the recommendations highlight where PHW, working with other organisations need to focus on internal processes as well as where we should be improving on our collaborative working.

PHW takes its responsibility to protect the health of people in Wales very seriously. Applying and sharing learning from the external review, we will continue to provide systems leadership in response to TB in Wales and ensure our processes reflect the latest practices and evidence. We will work with our partners to maintain and strengthen our commitment to raising awareness of the risks from TB on a population level as well as amongst health professionals, particularly with Primary Care Services.

Whilst PHW does not provide direct clinical services for TB in Wales, we will continue to support Health Boards through the TB cohort review process, recognising that this is a vital focal point to share learning and influence strategy. We have a designated TB Lead in our Health Protection Team who will have an important role to take this forward for PHW.

Through our regular health protection situation report, we will continue to inform our Executive Team and Board of significant incidents and outbreaks and outline the actions we are taking to control transmission. We will also review the findings of the internal review undertaken in 2019 to ensure that any actions not covered by the

	Recommendation	Response	Action	Lead	By When
1	The outbreak has not yet concluded and the high level of latent TB infection in the population implies further risk. This risk is heightened because the active disease in this population is predominantly pulmonary and therefore more infectious. Although the level of active TB infection is low in West Wales, delayed presentation in unrecognised cases may lead to further outbreaks and deaths. The level of awareness amongst the public and their health care professionals must be therefore increased and maintained. This also applies to trainee health professionals.	PHW already contributes to training of healthcare professionals through input into medical and nursing student training, postgraduate training (including for junior doctors), taught courses (e.g. MPH), as well as supporting training for other professionals including Environmental Health Officers through the Lead Officer training programme. All of these provide opportunity to raise the profile of TB.	PHW will continue to work with other partners to improve awareness of TB amongst the public and healthcare professionals, particularly with Primary Care Services in affected areas, including trainees, drawing on input from clinicians, public health specialists, communications specialists and behavioural scientists, amongst others.	Director of Health Protection, PHW	June 2023
2	Any future outbreaks should be overseen by PHW from the outset with a TB -specific standard operating procedure for the conduct and recording of outbreak management. The current SOP and OCT policy needs to be updated in this respect. The latter needs to be	The current PHW SOP outlines the general approach to TB cases and indicates when escalation to an OCT is required. This will be strengthened to ensure the TB-specific considerations and expectations of an OCT are explicit. These are already	PHW will work with HD UHB and other key partners to create a Standard Operating Procedure and updated OCT policy for the management of TB outbreaks and incidents. PHW will work with HDUHB and other partners to develop an SOP that is TB-specific and	Director of Health Protection, PHW	July 2023

	developed alongside modern data analysis and WGS typing so that outbreaks are identified and contained. Comprehensive contact networks of all cases should be recorded electronically and plotted with social network analyses undertaken to ensure links between cases are uncovered quickly and easily.	outlined in general terms in the Communicable Disease Outbreak Control Plan for Wales and include the communication and sharing of information with local health care services when an outbreak is identified, to ensure that affected communities are well informed of the symptoms of TB and what to do if they are experiencing symptoms.	makes references to the generic outbreak control plan and procedures on data management, network analysis and diagnostics (including whole genome sequencing). It will also include the development of a revised methodology for managing contact networks and analyses to ensure links between cases are uncovered quickly and easily.		
3	Funding should be identifiable ahead of time for outbreaks of infectious diseases so that such outbreaks can be managed in a timely and effective manner without the need for time-wasting discussion.	Responsibility for assessing and screening contacts sits with Health Boards as a matter of routine. As such, PHW role is in providing leadership to the outbreak response, health protection expertise, and coordination of any communication. Additionally, PHW has a CCDC with a lead role for TB, providing public health leadership across Wales. Other resources include those required for undertaking specific and mass community screening and helplines and	PHW will advocate for future revisions to the All Wales Communicable Disease Outbreak Plan to consider how financial resourcing is agreed amongst partners.	Deputy Director of Health Protection and Screening Services, PHW	July 2023

		communications. This is not specific to TB and includes response to other communicable diseases.			
4	The local TB service has improved but still has inadequacies. In particular, cross-cover arrangements need to be in place for annual, sick and study leave in order to prevent delays in treatment. Pharmacy and administrative support needs improvement. Succession planning for the TB Specialist Nurse also needs to be clear		HD UHB to lead		
5	At a national level, the Cohort Review Programme needs to be supported with adequate funding for each contributing health board.		PHW and HDUHB in collaboration with other key partners will work with Welsh Government and other health boards to agree the framework for ensuring the Cohort Review Programme is a central part of a TB strategy to reduce the incidence of tuberculosis in Wales. PHW will continue to support the cohort review through provision of epidemiological data and health protection input.	Director of Health Protection, PHW	To be confirmed

6	Welsh Government should support both the Cohort Review Programme and the proposal for a National Service Specification that includes the development of a TB pathway to tackle delayed diagnosis (e.g. investigating cough lasting longer than three weeks).	PHW's TB Lead submitted a proposal to Welsh Government for a TB strategy and Service Specification in 2021. This will form a firm foundation for developing a strategic approach to tackling TB in Wales in the future.	PHW and HDUHB in collaboration with other key partners will work with Welsh Government to agree the framework for ensuring that a national service specification for TB is a central part of a TB strategy to reduce the incidence of tuberculosis in Wales.	Director of Health Protection, PHW	To be confirmed
7	Wales does not seem to be properly prepared for the challenges of new migrants, refugees, and the occurrence of future drug resistance. These factors should be included in a future TB plan supported and funded by Welsh Government.	PHW's TB Lead submitted a proposal to Welsh Government for a TB strategy and Service Specification in 2021. This will form a firm foundation for developing a strategic approach to tackling TB in Wales in the future. PHW has been supporting the Wales response to the crisis in Ukraine. We have established a TB screening and laboratory diagnostic service to offer testing for active and latent TB amongst refugees from Ukraine. The outcomes are reported regularly through a dedicated surveillance programme.	PHW and HDUHB in collaboration with other key partners will work with Welsh Government and other health boards to agree the framework for a TB strategy and action plan to reduce the incidence of tuberculosis in Wales, including addressing the needs of under-served populations. Owing to the migratory nature of some underserved groups and recognising that TB does not respect administrative borders, we will work across the four nations in the UK to ensure any strategy complements those in other nations.	Director of Health Protection, PHW	To be confirmed