

23/12/2025

NN-ICB/25-1424

Dear Requestor

**Re: Freedom of Information Request**

Thank you for your request for information, received on 4 December 2025, regarding policies and guidance concerning the “bare below the elbows” approach or any equivalent dress-code policies for healthcare staff. We have processed your request in accordance with the Freedom of Information Act 2000 (FOIA).

Under the FOIA, public authorities like ours are required to respond to requests for information within 20 working days. In response to your request, I can confirm that we do hold the information requested.

**Please find below our response to your request:**

**1. Policies and Guidance**

Please supply the current version of any formal policies, protocols, guidance documents, or standards issued by the ICB relating to:

- “Bare below the elbows”
- Infection prevention dress-code requirements
- Clinical or non-clinical staff attire expectations
- Any occupational health or safety requirements related to staff appearance or uniform

The ICB does not have formal infection prevention dress-code requirements for clinical staff. Staff are referred to the national guidance on workwear - [Report template - NHSI website](#). The ICB does not provide direct ‘hands on’ personal/clinical care.

The ‘hosted’ community infection control team do not have uniforms but are required to be bare below the elbows for clinical visits to providers and there is access to disposable scrubs if required.

**2. Scope and Application**

Please clarify whether these policies apply to:

- All staff within the ICB
- Staff working in provider organisations commissioned by the ICB
- Primary care (GP practices), community providers, or other contracted services

Commissioned services contracted by the ICB and NHS providers have NHS standard contracts in place which includes a section *SC21 Infection Prevention and Control and Staff Vaccination* - [03-full-length-service-conditions-2526-cancer-amend-med-opt-mc.pdf](#).

In addition, Care Quality Commissioned (CQC) registered services must be compliant with the Health & Social Care Act 2008: code of practice on the prevention and control of infections and related guidance. This includes General Practice. Responsibility for monitoring compliance is through the regulator (CQC).

### 3. Implementation and Compliance

Does the ICB require, monitor, or enforce provider compliance with 'bare below the elbows'/dress-code expectations as part of:

- Commissioning contracts?
- Quality schedules (e.g., infection prevention requirements)?
- Assurance frameworks?

If monitoring occurs, please provide any documentation describing how this monitoring is carried out.

The community infection prevention and control teams support with quality monitoring of provider compliance with bare below the elbows/dress code expectations through their contracts and programmes of work. These include audit programmes of general practices in Nottinghamshire.

The Care Quality Commission (CQC) is the regulator responsible for monitoring compliance against the Health and Social Care Act 2008 for registered providers.

Secondary care services in Nottinghamshire are reporting compliance through national infection prevention and control board assurance frameworks (BAF). This framework links to the national infection prevention and control manual and the Health and Social Care Act 2008. Progress and compliance with BAF is reported quarterly through provider infection prevention and control committees. The ICB receives assurance through the Healthcare System Infection Prevention and Control Assurance Group - [NHS England » National infection prevention and control](#).

### 4. Exemptions or Adjustments

Please provide any guidance you hold on:

- Exemptions or reasonable adjustments for cultural, religious, or clinical reasons
- How exemptions are assessed or approved

ICB staff are not providing direct care. Appendix B in the national guidance advises on adjustments - [Report template - NHSI website](#).

### 5. Changes Since 2020

Have there been changes to these policies since 1 January 2020? If yes, please provide:

- The dates of changes
- A brief description of what changed
- Any archived versions of the policy still held by the ICB

Not applicable. The ICB was legally established on 1 July 2022.

If you are unhappy with the way in which your request has been handled, NHS Nottingham and Nottinghamshire Integrated Care Board (ICB) has an internal review procedure through which you can raise any concerns you might have. Further details of this procedure can be obtained by contacting Lucy Branson, Director of Corporate Affairs via [lucy.branson@nhs.net](mailto:lucy.branson@nhs.net) or by writing to FOI Team at NHS Nottingham and Nottinghamshire ICB, Sir John Robinson House, Sir John Robinson Way, Arnold, Daybrook, Nottingham NG5 6DA.

If you remain dissatisfied with the outcome of the internal review, you can apply to the Information Commissioner's Office (ICO), who will consider whether the organisation has complied with its obligations under the Act and can require the organisation to remedy any problems. Generally, the ICO cannot make a decision unless you have exhausted the complaints procedure provided by NHS Nottingham and Nottinghamshire ICB. You can find out more about how to do this, and about the Act in general, on the Information Commissioner's Office website at: <https://ico.org.uk/for-the-public/>.

Complaints to the Information Commissioner's Office should be sent to:

FOI/EIR Complaints Resolution, Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Telephone 0303 123 1113 or report a concern via <https://ico.org.uk/concerns/>.

Yours sincerely

Freedom of Information (FOI) Officer on behalf of NHS Nottingham and Nottinghamshire Integrated Care Board

[nnicb-nn.foi@nhs.net](mailto:nnicb-nn.foi@nhs.net)

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