COVID-19
Important guidance for independent healthcare services in Scotland
15 February 2021

Background
On 23 March 2020, in response to the COVID-19 situation, the UK and Scottish Governments announced that all non-essential businesses should close. Members of the public were advised they should stay at home, except for shopping for essential supplies, exercise or to attend essential work. Further to this, on 7 April 2020, Dr Jason Leitch, the Scottish Government’s National Clinical Director, wrote to all registered independent healthcare services asking them to stop providing services that were non-essential if they had not already done so.

Restarting services
The Scottish Government set out a route map through and out of the crisis. This has now been replaced with the Scottish Government’s Strategic Framework, with the aim of suppressing the virus while we strive to return to a more normal life. The 5-level system was introduced on 2 November 2020 and was applied to all local authority areas in Scotland.

In addition to this, the Scottish Government wrote to all Scottish Independent healthcare providers on 10 November 2020 to give them further detail on what the focus of care should be in relation to the levels. Scottish Government provided further clarity on this in a letter dated 8 January 2021 stating that cosmetic and aesthetic procedures are now prohibited in tier 4 areas.

Independent healthcare services will be able to use the strategic framework and the additional guidance to allow them to make an informed decision of what service is appropriate to provide based on their knowledge of their patients and the nature of their treatments.

It is important that services give consideration to the following points:

- the safety of their patients
- the safety of their staff, and
- the impact restarting services may have on the national plan to protect public health.

Advice directed to independent healthcare services is still valid. **However as legislation changes, new restrictions must be adhered to. Services should continue to be aware of the changing regulations and the impact on their healthcare service.**
Revised Legislation

Independent healthcare services are healthcare providers. However services should be aware of recent legislation implemented by the Scottish Government. In particular:

- The Health Protection (Coronavirus) (Restrictions and Requirements) (Local Levels) (Scotland) Regulations 2020

Services must make themselves aware and comply with the regulations that apply to them. In order to ensure the risk of spreading the disease is minimised as much as possible, clinicians should always consider:

- what impact the provision of their services have on the risk of spreading coronavirus
- the justification of a treatment versus the public health risks from COVID-19
- documenting the clinical decision for providing a healthcare service, especially if the removal of a face covering is required, during the COVID-19 pandemic, and
- the enhanced PPE required when removing face coverings.

Services should note the revised section of the legislation on the requirement to wear face coverings in certain indoor places, which now includes:

- any indoor communal area
  - in a workplace, and
  - where there are no measures in place to keep persons separated by either a—
    • partition, or
    • distance of at least two metres.

The legislation was further amended in January 2021. Services in tier 4 areas are now prohibited from opening other than for the provision of medical or surgical assistance. However, medical or surgical assistance does not include aesthetic or cosmetic procedures. As such, the only procedures taking place in tier 4 should be medically essential or urgent procedures.

You are responsible for the safety of yourself, your patients and your staff. The above regulations are enforced by the Police and local authorities.

Guidance for services

As registered healthcare professionals, you are responsible for ensuring care is delivered safely. Before services can restart, there must be appropriate policies and procedures in place to ensure the safety of patients and staff.

We have provided details below of guidance available to all services from various national bodies, in relation to policies, procedures and practices they must have in place before
It is important that services properly consider the guidance and how it applies to their service. Please note this is not an exhaustive list, as new evidence and guidance is being continually produced.

In addition to the sector-specific guidance in the next section, Healthcare Improvement Scotland (HIS) will expect, **as a minimum** that services review and strengthen their infection prevention and control policies, procedures and documentation including these specific areas:

1. pre-treatment assessment
2. environmental cleaning and decontamination
3. personal protective equipment (PPE) for staff and patients
4. cardiopulmonary resuscitation (CPR)
5. aerosol generating procedures (AGPs), and
6. staff training.

The Health Protection Scotland (HPS) website has links to updated and new guidance about COVID-19 for all of the areas listed above. Services’ policies and procedures and training/education for staff should reflect the revised/new HPS guidance in the links below.

- All Covid-19 related guidance/publications
- Primary Care Guidance
- Infection Prevention and Control Guidance in Healthcare Settings
- National Infection Prevention and Control Guidance, including AGPs

Services will also require to carry out and document appropriate environmental and staff risk assessments before reopening. In some instances, this may require patient and staff information, and appropriate policies and procedures, to be updated. Each patient must have a risk assessment carried out to assess the risk of COVID-19 transmission before any procedure takes place. Services must ensure that adequate insurance is in place to re-open.

Dental practices where the use of AGPs are needed as part of urgent or essential care must submit revised risk assessments and operating procedures to HIS before restarting these procedures. All other services must make this information available immediately to HIS, if requested. We may decide to visit some services to assure ourselves that all appropriate action has been taken.

In addition to the above information, services should consider general changes to the operation of their clinic to ensure they are compliant with social distancing requirements. For example:

- gaps between appointments, either to make sure patients are not sitting in the waiting room together or not having any patients waiting at all
- limited number of essential staff working in the service
- consider other ways to provide elements of the service
- only patients with an appointment can enter the service, and
- no cash payments.
As the provision of a safe environment is a priority, services must ensure they have appropriate ventilation in place. Provided services do not breach the service conditions on their HIS registration certificate, services working with registered healthcare professionals can decide what procedures are appropriate to carry out and when. However, a risk-based responsible approach must be taken, and services must take account of the revised/new guidance published by HPS, the sector-specific guidance below and the Scottish Government strategic framework.

**Notification guidance**

Services must complete the notification ‘Reopening of service after temporary closure’ to inform us of when they intend to resume providing their service. This must be submitted to us at least 2 working days before reopening. Services must not resume until the notification to reopen has been submitted and approved by HIS.

Dental practices undertaking aerosol generating procedures (AGPs) must submit revised risk assessments and operating procedures to HIS before restarting these treatments. These should be uploaded to your service account on the portal.

**Sector-specific guidance**

Each of the following sector-specific organisations have produced guidance for their members. This is publicly available on their websites. Some of the guidance includes template risk assessments, consent forms and further links to additional information. These may be useful for a variety of different services and not just those in the sectors listed below. Please take time to read the information and use the information that is appropriate for your service.

- British Association of Aesthetic Plastic Surgeons
- British Association of Cosmetic Nurses
- British College of Aesthetic Medicine
- British Medical Laser Association
- Faculty of General Dental Practice
- General Medical Council
- Health Protection Scotland – guidance for dentists on AGPs
- Health & Safety Executive
- Joint Council for Cosmetic Practitioners
- Royal College of General Practitioners
- Scottish Dental Clinical Effectiveness Programme

**Regulating services**

We will continue to regulate services as appropriate to ensure they are providing a safe level of care. This includes investigating inspections, complaints, registering new services and working with currently registered services.

**Our duty**

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As a regulator, we are fully aware of our duty not to contribute to any spread of COVID-19. Our future inspection and other regulatory activity will take this into consideration.