



COVID-19 - Guidance for reopening independent healthcare services in Scotland

1 June 2020

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 has set out a route map (see link below) through and out of the crisis. This sets out four phases over which the restrictions that have been imposed will be relaxed. The route map is a high-level document which sets the tone for the journey in nine key areas of life.

<https://www.gov.scot/publications/coronavirus-covid-19-framework-decision-making-scotlands-route-map-through-out-crisis/>

In addition to this, Scottish Government has written to all Scottish Independent healthcare providers to give them further detail on what the focus of care should be in each of the phases. Independent healthcare services provide a range of healthcare options for the people of Scotland and there is no one phase when independent healthcare services will restart. Independent healthcare services will be able to use the route map and the additional guidance to allow them to make an informed decision of when it is appropriate to re-open or recommence services based on their knowledge of their patients and the nature of their treatments.

It is important that when services restart they 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.

It is clear from the route map and the additional guidance in the early days the focus of the healthcare provided should be on that which is essential and urgent, with routine and elective care starting in the later phases.

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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 re-open 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.

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 restarting. 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 link below.

<https://www.hps.scot.nhs.uk/a-to-z-of-topics/wuhan-novel-coronavirus/>

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.

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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 take account of social distancing measures. 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 route map through and out of the COVID-19 crisis.

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

https://baaps.org.uk/about/baaps_guidance_on_the_resumption_of_work_after_covid-19.aspx

British Association of Cosmetic Nurses

https://www.bacn.org.uk/content/large/documents/members_documents/reference_material/covid-19/suggested_operational_plan_guidelines_for_covid-19_reintegration_of_medical_aesthetic_services.pdf

British College of Aesthetic Medicine

<https://bcam.ac.uk/about-bcam/his/>

Faculty of General Dental Practice

<https://www.fgdp.org.uk/sites/fgdp.org.uk/files/editors/Implications%20of%20COVID-19%20for%20the%20safe%20management%20of%20general%20dental%20practice%20a%20practical%20guide.pdf>

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Health Protection Scotland – guidance for dentists on AGPs

https://hpspubsrepo.blob.core.windows.net/hps-website/nss/3011/documents/1_covid-19-ipc-annex-1-dental-advice.pdf

Health & Safety Executive

<https://www.hse.gov.uk/news/coronavirus.htm>

Joint Council for Cosmetic Practitioners

<https://www.jccp.org.uk/>

Royal College of General Practitioners

<https://elearning.rcgp.org.uk/mod/page/view.php?id=10553#RCGP>

Scottish Dental Clinical Effectiveness Programme

<https://www.sdcep.org.uk/published-guidance/covid-19-practice-recovery/>

Regulating services

We will continue to regulate services as appropriate to ensure they are providing a safe level of care. This includes investigating complaints, registering new services and working with currently registered services. We will undertake inspections as required and take enforcement action if arrangements are not adequate.

Inspections

We intend to resume routine inspections in the autumn of 2020. We will take a risk-based and proportionate approach to the planning of our inspection activity, implementing new ways of working where appropriate and possible.

We are currently investigating other ways of inspecting services, particularly taking advantage of modern technologies to carry out remote inspections where appropriate. There will be a number of services where inspections can only be carried out on site and this will be reflected in our inspection planning. We will provide further information when it is available.

Our duty

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.

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