



Independent Healthcare Provider
Independent Dental Provider

1 June 2020

Dear colleague

INDEPENDENT HEALTH AND DENTAL CARE: SCOTLAND'S ROUTE MAP OUT OF THE COVID-19 PANDEMIC RESTRICTIONS

Scotland's Route Map

1. Further to the Scottish Government's letter of 7 April we are very grateful to you for your co-operation to-date in supporting Scotland's endeavours to control the COVID-19 pandemic. We appreciate that this may not have been without considerable cost to your business activities and the economy generally.
2. Progress out of the crisis will not be as quick as any of us would like, but we must move forward at a pace that continues to protect public health. If we move too fast we run the risk of increased infection with the need to return to lockdown, which will have an even greater impact, both socially and economically, than we have already seen.
3. As we move forward, it is important that the entire independent healthcare sector (including independent dentists) follow the spirit of the [route map](#) and support the key public health messages. **A key message is to 'stay as home as much as possible during phase 1'**.
4. Independent healthcare services are an important part of the healthcare system and the economy in Scotland. However, as clinicians we know that while some treatments and services are essential or urgent, others may be delayed without significant adverse impact on the health and wellbeing of our patients or clients.

The Importance of the Phased Approach

5. We appreciate that you will be anxious to know when each phase will start. However, as the First Minister has stated, it is not possible to be precise with the timings of when we will move into each phase. Indeed it may be that not all parts of each phase will be introduced at the same time.



6. Transition from one phase to the next will very much depend on the changes we see in the spread of the disease, only moving to a less restrictive phase if it remains under control and if we can keep the 'R' number below 1. You have a very important role to play in achieving this. By adopting the phased approach to restarting services and not encouraging significant numbers of people to travel for treatments or procedures that are not essential or urgent you will help to reduce the risk of potentially raising the value of R.

Ongoing Restrictions on Movement

7. You, of course, have a legal duty to comply with the Health Protection (Coronavirus) (Restrictions) (Scotland) Regulations 2020 as amended, and to not only protect your patients, clients and staff, but also public health more generally. You should be aware that there will still be certain restrictions on movement in the early stages of recovery and we ask that you do not try to persuade service users to travel for healthcare or procedures that are not essential or urgent until the advice changes.

Independent Hospitals, Hospices and Private Psychiatric Hospitals

8. For independent hospitals, hospices and private psychiatric hospitals the advice remains that you continue to provide essential or urgent care. As we move through the phases of the route map, those facilities that have been supporting the NHS will gradually be able to restart services that have stopped. And for services that have reduced capacity during the pandemic, gradually bring that back to normal.

9. A number of the larger private hospitals in Scotland are being utilised to provide NHS treatment. We are grateful for the independent sector's buy-in and co-operation in this regard. We will be seeking to utilise more of their capacity in the coming months to enable NHS Boards to remobilise in a measured and safe manner.

Independent Clinics

10. Those of you that provide independent clinics, will be aware of the range and diversity of the services provided, from dentistry and GPs, travel clinics and weight management to dermatology, aesthetic treatments and day case surgery. This range and diversity means it is impossible to say that all clinics can re-open in a particular phase. However we can say that during the early phases the focus should remain on the provision of essential or urgent care. **For all providers we have provided more guidance on what may happen in each phase in Appendix 1.**

The Importance of Safety

11. The protection of patients, clients and staff remains of paramount importance as we move forward, particularly in the early phases of the route map. This will necessitate changes in the way you work, some temporary and some permanent. Healthcare Improvement Scotland (HIS) will provide guidance on the steps you need to take to re-open. This will be available on their website as soon as possible. They will also sign-post you to as much guidance as possible about how to prepare your services to operate safely and minimise the transmission of COVID-19.

12. As is set out in the aforementioned regulations all services must take all reasonable measures to maintain physical distancing. It is accepted that it is not practical for health professionals to always maintain a distance of 2 metres when attending to patients or clients. However, reasonable measures must be put in place so that this can be observed by patients or clients waiting to be seen and by support staff.

Continuing Regulation of Independent Healthcare

13. HIS remains the regulator for registered independent healthcare services. As we move along the route map HIS will continue to undertake risk-based and proportionate enforcement activity to ensure compliance with the regulations they enforce. The focus of this activity in the short term will be to ensure that services have made proper provision for the health, safety and welfare of patients and clients and have appropriate systems, processes and procedures in place for the prevention and control of infection. Services must also ensure that they have adequate arrangements to protect the health, safety and welfare of staff and any additional requirements from the appropriate regulator of occupational health and safety.

Conclusion

14. This additional guidance aims to help you to navigate the way forward as we gradually ease restrictions. Your support so far has been integral in controlling the spread of the disease and saving lives. We continue to call on your professionalism and clinical judgement about how and when you restart your service, or begin to increase the range of treatments, procedures and care you provide in ways that do not have an adverse impact on the national effort to keep COVID-19 under control.

15. It is vital that we work together as we gradually relax restrictions and return all health and dental treatment and services, whether NHS or independent, to a position where they can operate safely and effectively, for the benefit of everyone involved, in the not too distant future.

Yours sincerely



PROFESOR JASON LEITCH

Yours sincerely



TOM FERRIS

The route map document is intentionally high level to make it accessible and relevant to the widest audience. With this in mind we would like to provide the following additional guidance on phases in the route map relating to the independent healthcare sector.

Phase 1

During this phase we anticipate that there will be very little change in the services that can be offered by the independent healthcare sector. The focus of service offered should remain on those essential or urgent treatments, taking into account that certain restrictions on travel remain in place. We recognise that some independent clinics may have closed. We suggest that those clinics that would normally provide urgent or essential care may wish to re-open for these purposes only.

The provider may want to consider:

- if the treatment is essential for the patient or client;
- how the benefit of the treatment or procedure outweighs the cost in relation to public health: and
- how it justifies the journey to the service.

Independent hospitals and clinics should use technology where possible to facilitate consultations without the need for unnecessary travel. However, remote consultations should still be in line with the general principles for remote prescribing and aesthetic and cosmetic treatments should still follow the GMC guidance on cosmetic interventions.

Phase 2

Although the default position for remote working remains in this phase, there is an acknowledgment that certain businesses other than those that carry out office-based work can re-open. This means that the use of the clinic setting or out-patients department can gradually increase, with appropriate public health and physical distancing precautions in place. Again in considering the need to invite a patient or client to an independent hospital or clinic we ask you to consider whether this is reasonably justifiable and that due consideration is given to public health messaging and demands on public transport.

We suggest that the focus of the treatments and procedures offered should still be based on those that meet one or more of the following criteria:

- Provide essential or urgent treatment.
- Follow up a previous treatment.
- Complete a course of treatment that was started before closing.
- Address a negative impact on the patient or client due to a delay in treatment.

Phase 3

Independent clinics and hospitals can begin to offer elective procedures and regular preventative healthcare check-ups and screening can begin to recommence.

Phase 4

All independent healthcare services offering a full range of treatments and procedures from their premises, with due consideration of public health advice.