



Independent Healthcare Provider
Independent Dental Provider

November 2020

Dear colleague

INDEPENDENT HEALTH AND DENTAL CARE: CORONAVIRUS (COVID-19): SCOTLAND'S STRATEGIC FRAMEWORK

Further to our letters of 7 April and 1 June we remain grateful to you for your enduring co-operation in supporting the nation's efforts to control the COVID-19 pandemic. We appreciate that this continues to come at a cost to your business, patients and clients.

As was anticipated, as we move through autumn into winter we are seeing a resurgence of coronavirus cases. Therefore the need to protect public health remains of paramount importance, if we are to prevent our NHS from becoming overwhelmed during the winter months. We continue to call on your professionalism and clinical judgement to ensure the range of treatments, procedures and care you provide is appropriate and delivered in a way that does not have an adverse impact on the national effort to keep COVID-19 under control.

Scottish Government Strategic Framework

In order to protect public health in a proportionate way the Scottish Government has introduced a new [Strategic Framework](#) with the aim of suppressing the virus while we strive to allow as many people as possible to retain some semblance of normality. The [5-level system](#) will help you to understand and prepare for protections that might be instigated. It will also indicate how and when they may be lifted.

This new system has been introduced from 2 November and the Scottish Government has set out the details of the level that is being applied to each part of the country, which will be reviewed on a regular basis. The impact the respective levels will have on the treatment and services that you provide is set out as follows:

Independent hospitals, hospices and private psychiatric hospitals

Independent hospitals, hospices and private psychiatric hospitals should continue to provide services as appropriate in dialogue with local public health teams. Those services which provide palliative and longer term care should make sure that arrangements are in place for visiting that reflect the prevailing level for their area and the circumstances of patients and



families. Those services that offer elective and aesthetic treatments or procedures should make arrangements to suspend this activity if the prevailing level for the area is 4.

We once more acknowledge that many private hospitals are supporting the NHS by providing additional capacity as required, for which we are grateful.

Independent clinics

Levels 0, 1, 2 and 3 - Independent clinics can offer a range of treatments and procedures from their premises, but in doing so must continue to fully adhere to all public health advice. In particular as regards to social distancing and the use of PPE and face coverings, which should not be removed unless there are sound clinical reasons to do so.

Level 4 - The focus of care should be restricted to essential or urgent treatment of clinically diagnosed conditions where no treatment would have a significant adverse impact on the wellbeing of the patient.

No aesthetic procedures or elective treatments should be undertaken in Level 4 areas.

Face Coverings, PPE Physical Distancing and Hygiene

The protection of patients, clients and staff remains the priority, regardless of the category given to the area in which independent healthcare providers are situated. I know that as healthcare professionals you are fully aware that the use of face coverings, physical distancing and hand hygiene remain key tools in breaking the chain of transmission.

We therefore ask that you continue to recognise this in moving forward and to ensure that your staff are in no doubt of their responsibilities in this regard. If you need to ask a patient to remove a face covering, and this should be the exception unless it is for dental treatment, it should be for the shortest period possible and it is essential that the PPE used provides protection for both the clinician and the patient.

Face coverings should not be removed unless there are sound clinical reasons to do so. You should consider the public health implications along with the risks and benefits of providing the treatment, which should be documented in the patient's care record. **Aesthetics procedures or elective treatments should not be carried out in level 4 areas.**

Comprehensive guidance on the provision of healthcare during the pandemic to prevent the spread of COVID-19 is available on the [HPS website](#). For dentistry there is further guidance on the [Scottish Dental Clinical Effectiveness Programme website](#).

Regulation and Enforcement

Healthcare Improvement Scotland (HIS) remains the regulator for registered independent healthcare services. HIS will continue to undertake risk-based and proportionate enforcement activity to ensure compliance with their regulations. The focus of this activity will be to ensure that services have made proper provision for the health, safety and welfare of patients and clients and have robust systems, processes and procedures in place for the prevention and control of coronavirus infection.

Providers must also continue to ensure that they have made appropriate arrangements to fully protect the health, safety and welfare of staff and to comply with any additional requirements placed on you by regulators of occupational health and safety.

Travel between higher and lower level areas is restricted and therefore providers must be aware of the travel restrictions relevant to the prevailing level for their area. Patients should not make journeys outside their local authority area unless it is permitted or they require essential or urgent healthcare that cannot be provided within their local authority area.

The enforcement of travel restrictions and public health safety measures, as set out in legislation, is a matter for the police and local authority environmental health officers.

Government Support for Businesses

Advice on the support available to businesses during COVID-19 can be found on the [UK Government](#) and [Scottish Government](#) websites.

Conclusion

We fully understand how difficult the last 9 months have been for you, but it is only by our joint efforts that we will be able to once more bring the virus under control, as we await a more permanent means of elimination through medical science.

Your support is therefore essential during this extremely challenging period and we know that you will continue to do everything in your power to protect the people of Scotland from Covid infection. Thank you for that commitment.

Yours sincerely



PROFESSOR JASON LEITCH

Yours sincerely



TOM FERRIS