



## Welcome to our November newsUpdate

There have been a lot of changes to COVID-19 measures in all four UK nations in the past weeks and we have been contacting all our Registrants by email to keep them up to date. We appreciate there is a lot of information to take in, so this issue of our newsUpdate will focus on the latest restrictions on working.

## England

### Current restrictions

The current lockdown restrictions in England began on 5 November and end on 1 December.

Based on the legal advice we have received, CNHC Registrants in England meet the definition of "other...health services, including services relating to mental health" contained in Section 47, Part 3 of the Schedule to [The Health Protection \(Coronavirus, Restrictions\) \(England\) \(No. 4\) Regulations 2020](#) and can therefore continue to practise. This legal advice has taken into account that in Sections 25D and 25E of the NHS Reform and Health Care Professions Act 2002 (as inserted by the Health and Social Care Act 2012) practitioners on Accredited Registers are defined as engaged in work that includes the provision of healthcare.

However, this is subject to the restrictions and additional requirements set out below:

#### 1. You must only provide therapies to clients who have identified health needs

CNHC Registrants can continue to provide the therapies they are registered for, on a one-to-one basis, for an identified mental or physical health condition or injury that is causing the client pain or having an adverse impact on their mobility or their quality of life. This is for you to establish using your professional judgement and expertise in the discipline you practise, based on information you should elicit from your client/potential client before agreeing to see them. You may decide to undertake further research, confer with colleagues at your practice or seek the advice of your professional association (while maintaining client confidentiality) before confirming a health need.

#### 2. You need to be able to evidence a health need

Unless you have received a direct referral from a statutory regulated health professional, you must be able to evidence that your therapeutic intervention is supporting your client with their condition. You can do this by noting in your client records:

- The symptoms your client has.
- The adverse impact those symptoms are having on their daily life.
- Their medical history, including any pre-existing conditions or diagnosis they have received from their GP, hospital consultant, or other regulated health professional.
- A clear rationale for the care that you are providing.

You should already be keeping detailed, up to date and attributable client records. See CNHC's [Code of Conduct, Ethics and Performance](#), section B7 "Maintaining client records" (at page 17).

#### 3. Mobile working is restricted

You cannot provide treatment to a client in their own home unless you have received a direct referral from a statutory regulated health professional. If you have received a referral, you may see a client in their own home so long as you:

- Check that your insurance will cover this.
- Think about how you will manage social distancing and hygiene in an environment that is not your own and communicate with the client in advance about how to manage this.
- Consider who else lives with the client and whether they are in a high or moderate risk group.
- Check before you enter the client's home if they, or anyone who lives with them or is in their support bubble, have had any coronavirus symptoms or if they have been contacted by NHS Test and Trace and told to self-isolate. If the answer is yes, then do not enter the home or provide the therapy.

See CNHC's advice on [seeing clients in their own homes](#).

#### 4. If your practice is based in your home

You can continue to work as long as it is COVID-secure and is covered by your insurance. You must:

- Only provide treatments in a room which is not used by other members of your household.
- Sanitise the treatment room and any other parts of your home that clients have to pass through to reach the room between each appointment. Not doing this could place both your clients and members of your household at risk.
- Check all members of your household daily for any symptoms of COVID-19.
- Follow our [advice on working safely](#) to make sure your practice is COVID-secure.

### The new local restriction tiers coming into effect on 2 December

The Prime Minister announced yesterday (23 November) a return to a tier system. Although less restrictive than the national lockdown the new three tier system will be stricter than the previous one. The new local restriction tiers are:

- Tier 1: Medium alert
- Tier 2: High alert
- Tier 3: Very High alert.

In all three tiers "personal care", the category in which complementary healthcare is deemed to fall under, can remain open. This includes mobile working. Guidance on the local restriction tiers can be found [here](#).

The full list of local restriction tiers by area can be found [here](#).

## Northern Ireland

UPDATE: Circuit-breaker measures are in place from 27 November to 10 December. CNHC Registrants providing close contact services (i.e. 'hands-on' therapies where social distancing is not possible) must stop working during this time. However, you may continue to work: in a statutory regulated setting e.g. a hospital or hospice where the therapy you provide is part of a patient's care plan or if your client has been referred to you by a statutory regulated health professional. You can also continue sports massage therapy to an elite athlete. You can find government guidance on the current restrictions [here](#).

## Scotland

### Local protection levels

A new system of [local protection levels](#) was introduced on 2 November. You can find the guidance issued by the Scottish Government [here](#).

You can also use this [postcode checker](#) to find out which level of protection applies to you.

**Levels 0 and 1:** You can provide close contact services (i.e. 'hands-on' therapies where social distancing is not possible) including mobile services.

**Levels 2 and 3:** You can provide close contact services from your premises, including a home treatment room. However, mobile working is not permitted.

**N.B. Services offered in the 'high risk zone':** For levels 0 to 3 the Scottish Government's guidance states: "The 'high risk zone' is defined as 'the area in front of the face where splashes and droplets from the nose and mouth may be present, which can pose a hazard'. If treatments in the high risk zone cannot be carried out without the ability to be provided from the side of the face or behind the head and therefore require prolonged periods in the highest risk zone then they should not be offered."

**Level 4:** All CNHC Registrants providing close contact services in areas subject to level 4 restrictions must stop working until 11 December. Eleven council areas moved into level 4 on 20 November – City of Glasgow, Renfrewshire, East Renfrewshire, East Dunbartonshire, West Dunbartonshire, North Lanarkshire, South Lanarkshire, East Ayrshire, South Ayrshire, Stirling, and West Lothian.

#### What will happen when level 4 restrictions end?

The Scottish Government will assess nearer the time the level that will apply in each area when the level 4 restrictions end.

### Travel restrictions

[Guidance on non-essential travel](#) that had previously been advisory became law on 20 November:

- People living in level 3 or level 4 areas will not be allowed to travel outside those areas unless it is essential.
- People from other parts of Scotland will not be able to travel into level 3 or level 4 areas unless it is essential.
- People in Scotland will not be allowed to travel to other parts of the UK unless it is essential.

This means that:

- As close contact services must close in level 4, Registrants who live in areas in levels 0 to 3 cannot travel in level 4 areas.
- Registrants can leave their home in a level 4 area to work in a level 3 area, but please be mindful of the national effort to control the virus and carefully consider if your travel is essential and within the [law](#).

## Wales

New [national restrictions](#) replaced the fire-break measures on 9 November.

CNHC Registrants providing close-contact services (i.e. working 'hands-on' where social distancing is not possible) are able to work under these new restrictions.

## More advice and information

You can find out advice on following government advice on working safely [here](#).

You can find also information and resources in the [coronavirus news](#) section of our website.

## Contact us with your questions

If you have any questions, comments or would like to know more about [registering with CNHC](#), please don't hesitate to contact us at [info@cnhc.org.uk](mailto:info@cnhc.org.uk)

### Contact CNHC

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