

Judy Walker  
Public Health England  
Sent by email

Dear Ms Walker,

## COVID-19: Guidance for the remobilisation of services within health and care settings

### [Infection prevention and control recommendations](#)

We the undersigned are writing to express our concern at the apparent contradictions in the above document. We represent over 15,000 regulated/registered Healthcare Professionals working predominantly in Private Practice settings and have found that this document contains information which appears contradictory and conflicts with other PHE published resources. We note that the document is stated as relevant to the independent sector but the issues we have identified seem to place the guidance as more relevant to private hospitals than to independent private practitioners in our health sector.

#### Medium or Low risk Pathway?

Whilst the definitions on page 11 place the usual private practice setting in Medium Risk, our members are only seeing patients who have been screened as per Appendix 1 of the document, which states that they may then be treated as 'Low risk'.

#### Personal Protective Equipment Requirements

When considering the PPE requirements for the Medium risk pathway, section 5.1 outlines clearly the risk scenarios whereby each item should be worn but section 9.2 makes no reference to risk assessment for each of these items. This contradicts the [PPE guide for Community and Social care](#) settings where Scenario 1 very much reflects the usual private practice environment and also meets the requirements previously confirmed as 'full PPE' for the NHS Test and Trace service.

Page 25, section 8. States that 'Transmission Based Precautions (TBPs) are **additional** measures (to SICPs) required when caring for patients/individuals with a known or suspected infection such as COVID-19.' This contradicts the criteria for being in medium risk as our members are only seeing asymptomatic patients, subject to the screening questions in Appendix 1.

#### Conclusion:

Throughout the COVID-19 pandemic we have worked collectively to ensure that our members are well guided on how to apply Public Health England guidance. These settings are usually small and independent businesses, run by practitioners without the logistical support provided by a large organisation such as the NHS, therefore consistency and clarity is crucial.

#### We ask that Public Health England:

- Consult with this Private Practice Group to ensure our Healthcare Setting is considered in future documents
- Confirm whether Appendix 1 applies to triaging the private practice setting to the 'Low Risk' pathway
- Confirm whether the PPE recommendations for 'Medium Risk' pathway continues to allow for risk assessment of the use of Eye Protection (i.e. when the patient has a cough)

Yours sincerely,

  


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