



Llywodraeth Cymru  
Welsh Government

PUBLICATION

# Acupuncture, clinical and sports therapy services: coronavirus workplace guidance

How to work safely during the COVID-19 pandemic if you work or employ people in close contact therapy practices.

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Everyone in Wales has an important part to play in helping to prevent the spread of coronavirus – and this means thinking carefully about the contact we all have with other people. It remains critical that all employers, employees, the self-employed and clients take steps to keep everyone safe. Your businesses are under a duty to **take reasonable measures to minimise the risk of exposure to coronavirus**. We will all need to work hard to keep Wales safe by following some simple guidance to reduce the risk.

Welsh Government continues to prioritise the protection of people. We continue to base our approach on the latest scientific and medical advice of the risk from particular settings, the extent to which other risk mitigations are available and in place, and the level of disease-causing transmission.

The **Coronavirus Regulations** impose restrictions on gatherings, the

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movement of people, and the operation of businesses. Businesses that are permitted to operate, or premises that are allowed to open from the 12 April must do so safely in a way that complies with the Coronavirus Regulations, in addition to other legal obligations imposed on employers (such as health and safety legislation). If you do not comply with your duty to take reasonable measures to minimise the risk of exposure to coronavirus, your businesses are considered to be amongst the highest of risk settings. To support businesses and service providers to work safely the Welsh Government has adopted five key principles:

- Care: our health and well-being comes first.
- Comply: the laws that keep us safe must be obeyed.
- Involve: we will share responsibility for safe work.
- Adapt: we all need to change how we work.
- Communicate: we must all understand what to do.

Further [guidance on the key principles](#) is available on the Welsh Government website.

This guidance replaces the guidance published on 10 December 2020 for Close Contact Services. This revised guidance is intended to cover all Alert Levels and is to help employers, employees and the self-employed who work in complementary alternative medicine, sports and remedial treatment and preventative and complementary (holistic) healthcare therapy settings to understand how to work safely, taking all reasonable measures to minimise the risk of exposure to COVID-19. Refer to the [COVID-19 alert levels](#).

Welsh Government has published the [Coronavirus Control Plan for Wales](#), setting out how we will all work together to manage the risks of COVID-19 and it is recommended that you review the plan.

This guidance has been revised to provide updated advice. It reinforces the fact that owners and managers of complementary alternative medicine, sports and remedial treatment and preventative and complementary (holistic) healthcare therapy settings or businesses are under a duty to take reasonable measures under regulation 16 of the Health Protection (Coronavirus Restrictions) (Wales) (No. 5) Regulations 2020 to minimise the risk of exposure to coronavirus and

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reinforces the very strong Public Health Wales advice that you do not undertake face-to-face high risk treatments which are extremely difficult to carry out safely both for the practitioner and the client without the appropriate grade PPE.

## About this guidance

This document is to help you to continue to operate safely in Wales during the COVID-19 pandemic, outlining the reasonable measures to minimise risk of exposure to coronavirus and the enforcement measures that can be taken by local authority environmental health officers if the person responsible for the premises does not take reasonable measures to minimise the risk of exposure to coronavirus on premises or in the workplace setting.

This guidance is aimed at the following close contact practitioners:

- Complementary and alternative health practitioners, including
- Acupuncturists
- Clinical therapists
- Sports therapists and sports massage therapists

who operate in:

- Hospitals, hospices and other regulated healthcare settings.
- Private clinics
- Or home based settings or those providing mobile services in other people's homes.

It should be noted that non-essential retail businesses, which include close contact services, will be required to close during an Alert Level 4 condition. The exception will be referrals from regulated medical professionals for therapeutic treatments for clinically diagnosed conditions or essential medical and health needs. Such as treatments for a diagnosed health condition or injury that is currently causing severe pain or mobility issues, or severely impacting quality of life and cosmetic treatments associated with cancer treatment. In all cases the measures on safe working contained in this guidance should be followed.

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This does not extend to elected services provided for general stress relief, relaxation or preventative healthcare purposes.

The Welsh Government has issued guidance notes under the Coronavirus Regulations **on taking all reasonable measures to minimise exposure to coronavirus in workplaces and premises open to the public** and **Face Coverings: guidance on measures to be taken by employers and managers of premises**. These guidance notes are referred to collectively in this document as the **Statutory Guidance** to which all individuals and businesses subject to the duties in the **Coronavirus Regulations** to minimise risk of exposure to coronavirus must comply with. You have a responsibility to ensure that you are aware of the guidance as well as keeping aware of any further regulatory changes.

In the event of any discrepancy between this guidance and the Statutory Guidance, the Statutory Guidance has priority.

This guidance builds on these requirements with practical advice for your specific circumstances to help you think about what you need to do during the COVID-19 pandemic to work safely and support your employees' and clients' health and wellbeing and not contribute to the spread of the virus.

This guidance does not supersede any legal obligations relating to health and safety, employment or equalities and it is important that as a business or an employer you continue to comply with your existing obligations, including those relating to individuals with protected characteristics.

We expect that this document will be updated over time. This version is up to date as of 9 April 2021. You can check for updates at **Keep Wales Safe – at work**.

This document advises how to re-open your clinics or workplace setting safely while minimising the risk of spreading COVID-19.

In order for you to reopen you must take appropriate steps to safeguard against COVID-19 in the following 5 essential areas.

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The guidance sets out:

1. what you should do before you reopen your clinic or work setting;
2. what you should do to protect yourself and your staff
3. what you should do to protect your clients and visitors;
4. what you should do to keep your business premises clear of COVID-19.
5. the circumstances when you should use PPE and the requirement to wear face coverings in all public places.

Each therapy setting will need to translate this into the specific actions it needs to take depending on the size of the practice, how it is organised, operated, managed and regulated. Practices will also need to regularly monitor these measures to make sure they are continuing to protect clients and workers.

You should note that when operational you will be under a duty to take all reasonable measures to ensure a 2 metres distance is kept between persons, to take any other measure to minimise the risk of exposure to coronavirus, for example measures which limit close face to face interaction and maintain hygiene and to provide **information to anyone on your premises on how to minimise that risk**.

It is accepted that as providers of close contact treatments you will not be able to maintain 2 metre distancing with a client when providing treatments, but you will be required to take other measures to reduce the risk of transmission of coronavirus. This includes reducing the time spent within close contact with a client, for example undertaking consultations virtually either by phone or video call. There will be other circumstances, where you will be able to take reasonable measures to ensure distance is kept, for example, when clients are waiting to enter premises.

To help you decide which actions to take, you are legally required to carry out an appropriate Coronavirus Risk Assessment, just as you would for other health and safety related hazards. This coronavirus risk assessment must be done in consultation with unions or workers, where appropriate.

A blank Coronavirus Risk Assessment template has been published on the website alongside this guidance together with an action card to help you

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introduce the mitigation measures contained in this guidance.

A customer action card has also been produced to remind customers of their responsibilities to help support the close contact services sector to reduce the risk of Covid-19 transmission. It has been published on the website alongside this guidance to assist you when booking appointments.

## Reopening your place of work

### Section 1. What you should do before you reopen your place of work

#### 1.1 Assessment of premises: making sure premises are safe to reopen

You need to be mindful of the need to open up premises carefully. Business premises are not often left empty and you may wish to see the advice on maintaining drinking water quality when reinstating water supplies after temporary closure due to the COVID-19 outbreak, produced by the Drinking Water Inspectorate who are the Regulators and technical experts to everything [drinking water related in England and Wales](#).

You should undertake an assessment for all your sites, or parts of sites that have been closed, before reopening the premises which you own or rent, this will include legionella, ventilation checks and PPE supplies and undertaking a thorough cleaning of the premises and installing hand sanitisers before reopening.

#### 1.2 Thinking about Risk: all businesses must carry out a Coronavirus Risk Assessment

COVID-19 is a public health emergency. Everyone needs to assess and manage the risks of COVID-19, and businesses must consider the risks to their workers and clients.

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As an employer, you have a legal responsibility to protect workers and others from risk to their health and safety. This means you need to think about the risks they face and do everything reasonably practicable to minimise them, recognising you cannot completely eliminate the risk of COVID-19.

You must make sure that the Coronavirus Risk Assessment for your business addresses the risks of COVID-19, using this guidance to inform your decisions and control measures.

You should also consider the security implications of any decisions and control measures you intend to put in place, as any revisions could present new or altered security risks that may require mitigation. A coronavirus risk assessment is not about creating huge amounts of paperwork, it is about identifying sensible measures to control the risks in your workplace.

If you have fewer than five workers, or are self-employed, you are not required to write anything down as part of your risk assessment however it would help you and your employees better understand the measures required to keep yourselves and clients safe. Your risk assessment will help you decide whether you have done everything you need to. There are interactive tools available to support you from the **Health and Safety Executive (HSE)** and HSE: **What to include in your COVID-19 risk assessment**.

You may also wish to refer to the Covid-19 Hierarchy of Controls which form the basis of all risk assessments. The hierarchy of controls are:

**Elimination:** in the context of a pandemic, complete elimination of Covid-19 risk is not possible.

**Substitution:** replacing the process with a less hazardous one where feasible, such as home working.

**Engineering controls:** mechanical reduction of the hazard (e.g. mechanical ventilation or air purification systems) or natural ventilation and air exchange systems or using physical barriers to separate people.

**Administrative controls:** methods to reduce the time or amount of exposure. This

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could include redesigning your workspace to maintain social distancing of at least 2 metres, splitting the workforce into designated teams, staggering of appointment start times or operating a one in one out appointment system, reducing or eliminating waiting or reducing appointment times.

## **Personal Protective Equipment (PPE)**

Employers have a duty to consult their staff on health and safety. You can do this by listening and talking to them about the work and how you will manage risks from COVID-19.

The people who do the work are often the best people to understand the risks in the workplace and will have a view on how to work safely. Involving them in making decisions shows that you take their health and safety seriously. You must consult with the health and safety representative selected by a recognised trade union or, if there isn't one, a representative chosen by workers. As an employer, you cannot decide who the representative will be.

At its most effective, full involvement of your workers creates a culture where relationships between employers and workers are based on collaboration, trust and joint problem solving. As is normal practice, workers should be involved in

assessing workplace risks and the development and review of workplace health and safety policies in partnership with the employer.

Employers and workers should always come together to resolve issues.

You should develop communication and training materials for workers prior to returning to site, especially around new procedures for arrival at work.

## **1.3 Ventilation**

Those in control of a premises have a **legal duty** to ensure effective ventilation. You must include ventilation as part of your workplace coronavirus risk assessment and adopt all the necessary mitigation measures.

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The Health and Safety Executive (HSE) has updated and expanded its advice to help owners and employers provide adequate ventilation in their workplaces and premises during the pandemic. The guidance builds on helping you to identify and take action in poorly ventilated areas. It also provides guidance on other factors to consider when assessing the risk from aerosol transmission, and determining whether adequate ventilation is being provided to reduce this risk.

You should be maximising the fresh air in a space and this can be done by:

- natural ventilation (by opening windows and propping open internal doors (but not fire doors) where possible)
- mechanical ventilation
- a combination of natural and mechanical ventilation, for example where mechanical ventilation relies on natural ventilation to maximise fresh air

Read the updated [guidance on air conditioning and ventilation](#) and find out how you can provide adequate ventilation in your workplace, helping to protect workers and other people from transmission of coronavirus.

There is also advice available for building services, particularly around ventilation of buildings, both in use and when returning to buildings which have been closed from the following:

- [Chartered Institution of Building Services Engineers](#)
- [The Building Engineers Services Association](#), and
- [REHVA](#)

#### **1.4 What will happen if you do not comply with regulation 16 and 17 of The Health Protection (Coronavirus Restrictions) (Wales) (No. 5) Regulations 2020 and the relevant public health legislation and guidance to control COVID -19 and other public health risks?**

Failure to complete a risk assessment which takes account of COVID-19, or completing a risk assessment but failing to put in place sufficient measures to manage the risk of COVID-19, could constitute a breach of health and safety law.

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Where the enforcing local authority, identifies employers who are not taking action to comply with the relevant public health legislation and guidance to control public health risks, they are empowered to take a range of actions to improve control of workplace risks. For example, this would cover employers not taking appropriate reasonable measures to prevent the spread of coronavirus.

## **Enforcement powers and principles of enforcement**

Part 7 of the Health Protection Regulations set out a specific and separate system for enforcing regulation. This provides that enforcement officers (generally appointed by local authorities) can require specific measures to be taken in relation to premises within a specified time period and they can issue Improvement Notices. If an Improvement notice is not complied with or if the breach of the duties imposed by Regulation 16 or 17 means that closure is necessary and proportionate for the purpose of minimizing the risk of exposure to coronavirus, then closure of the relevant business premises can be required.

Failure to comply with the legal requirements imposed on businesses by the Health Protection (Coronavirus Restrictions) (No. 5) (Wales) Regulations 2020 will mean that the business is breaking the law and accordingly, a fixed penalty fine can be imposed.

The enforcement system is set out in Part 7 of the Regulations and centres around a “**Premises Improvement Notice**” or a “**Premises Closure Notice**” or both, depending on the circumstances. Offences and penalties is set out in Part 8.

You may wish to see guidance to [enforcement officers on regulation](#).

The appropriate use of powers to enforce these restrictions and requirements imposed by the Regulations is important to:

- promote and maintain sustained compliance as a preventative measure to help contain the coronavirus;
- ensure action is taken immediately to deal with situations in which there is a risk of coronavirus spreading; and

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- ensure that those who fail to comply are held to account.

If people don't comply premises can be closed down for a period of up to 14 days.

The Regulations set out a right of appeal against an improvement notice or closure notice to the magistrates' court. They can award compensation, for example, if they consider a premises wrongfully closed, but they can also uphold the notice. Generally the issue of a closure notice will mean that the premises remain closed until the appeal is heard, and will remain so if the court upholds the notice.

In the event of an improvement notice being issued that notice must be displayed in a prominent place at each entrance to the premises, as well as a sign as prescribed in Part 7 of the Regulations indicating that the notice has been issued and improvement is needed. Similarly a closure notice and accompanying sign must also be displayed if such a notice has been issued indicating that the premises have been closed.

### **Who enforces the restrictions?**

The restrictions are being enforced by local authority environmental health officers. They can issue the improvement or closure notices and, if a closure notice is not complied with they may recommend prosecution in a magistrates' court.

### **What are the financial penalties?**

Clearly there is a financial implication for any business which is required to close. Which is why that action will not be taken likely. However where closure is thought by an environmental health officer to be necessary to protect the public, a closure notice will be issued.

The coronavirus **regulations** state that failure to comply with a closure notice is a criminal offence. It is punishable by a fine and there is no limit on the amount of fine that may be imposed.

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It is also an offence to enter premises that are closed under a closure notice (unless there is a reasonable excuse to do so) or to remove, damage or obstruct a notice or sign on display at premises where an improvement or closure notice is in force. Again, these offences are punishable by a fine but in addition, an enforcement officer may issue a fixed penalty of £60; this is increased to £120 for a second offence and continues to double for repeated offences, up to a maximum of £1,920.

### **1.5 Managing risk: taking action to reduce risk to the lowest reasonably practicable level by taking preventative measures, in order of priority**

Employers have a duty to reduce workplace risk to the lowest reasonably practicable level by taking preventative measures. Employers must work with any other employers or contractors sharing the workplace so that everybody's health and safety is protected. In the context of COVID-19 this means protecting the health and safety of your workers and clients by working through these steps in order:

- Ensuring both workers and clients who feel unwell stay at home and do not attend the premises.
- In every workplace, increasing the frequency of handwashing and surface cleaning.
- Businesses should take all reasonable measures to ensure a 2 metre distance is kept between persons, to take any other measure to minimise the risk of exposure to coronavirus, and where it is not possible to maintain 2 metre distancing with a client, to take other measures to reduce the risk of transmission of coronavirus. You should consider and set out the mitigating actions you will introduce in your risk assessments. When providing close contact services, it often may not be possible to maintain 2 metre distancing. You should follow the latest scientific advice which is to wear a Type II mask (as source control - to protect the client from the practitioner) and a clear visor (to protect the practitioner from the client) in addition to the PPE that might usually be worn. It should be noted that Type II masks are not clinical grade PPE.

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Close contact service settings are considered to be amongst the highest at risk settings if they do not comply with their duty to take reasonable measures under regulation 16 and 17 to minimise the risk of exposure to coronavirus. It is for this reason that Public Health Wales strongly advise that close contact practitioners should not carry out treatments that will bring them within the 'highest risk zone' of clients (defined as the area in front of the face where aerosols and droplets from the nose and mouth, caused by, breathing, speaking, coughing or sneezing that can be present and pose a hazard from the client to the practitioner and vice versa) for the entire duration or the majority of the time the close contact service is being provided unless they are wearing the appropriate grade PPE. 'High risk zone' treatments are covered in section

### **3.3. Further mitigating actions include:**

- Enhanced ventilation either from natural or mechanical sources to maximise fresh air.
- Further increasing the frequency of hand washing and surface cleaning.

Using screens or barriers to separate clients from one another. If the practitioner is wearing a visor, screens will not provide additional protection between the practitioner and the individual. Everyone working in close proximity to each other for an extended period of time should wear a Type II mask and a clear visor.

- Face-to-face working should be avoided if at all possible and time spent working in the high risk zone should be restricted to the minimum amount of time possible.
- Particular attention should also be paid to avoiding contact with surfaces near to the client and thoroughly cleaning those surfaces after each client.
- In your assessment you should have particular regard to whether the people doing the work are especially vulnerable to COVID-19. The recommendations in the rest of this document are ones you must consider as you go through this process.
- You could also consider any advice that has been produced specifically for your sector by your industry associations
- You must carry out an assessment of the risks posed by COVID-19 in your workplace before you reopen your business. You are likely to have gone

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through a lot of this thinking already however we urge you to use this document to identify any further improvements you should make.

- You must review the measures you have put in place to make sure they are working. You should also review them if they may no longer be effective or if there are changes in the workplace that could lead to new risks.

## 1.6 Sharing the results of your risk assessment

- You must share the results of your Coronavirus Risk Assessment with your workforce.
- If possible, you should consider publishing the results on your website; we would expect all employers with over 50 workers to do so.

We would expect all businesses to demonstrate to their workers, clients and guests that they have properly assessed their risk and taken appropriate measures to mitigate this. You should do this by displaying a notification in a prominent place in your business and on your website, if you have one.

# Managing the risk

## Section 2. What you should do to keep yourself and your staff safe from COVID-19

When considering how to apply this guidance, take into account agency workers, contractors and other people, as well as your employees. The health and safety of workers and clients, and public health, should not be put at risk.

The coronavirus restrictions impose obligations on people responsible for premises where work takes place to take all reasonable measures to minimise the risk of exposure to coronavirus.

Equally employees have a legal responsibility to their employer and to each other to follow instructions about safe working practices.

Welsh government expects that businesses and others understand the severity

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of the situation we are facing as a society and will take the reasonable steps necessary.

We encourage employers and workers to always come together to resolve issues, however, we are clear that workers should not be forced into an unsafe workplace and if an individual remains concerned about the safety measures in any premises, then they should report this to the Public Protection services of the relevant local authority.

This document has been prepared by the Welsh Government with input from unions and industry bodies, Local Authority Environmental Health Officers and Health and Safety Executive (HSE) and in consultation with Public Health Wales (PHW) and Health Inspectorate Wales (HIW).

People providing treatment therapies in home based settings or those providing mobile services in other people's homes, should also refer to the guidance on [working safely during COVID-19 in other people's homes](#)

## 2.1 Who should go to work?

In order to keep the virus under control, it is important that people work safely. Working from home remains the safest way to do this, however it is recognised that for most close contact therapists, it is often not possible to work from home.

Employers should consult with their employees to determine who can come into the workplace safely taking account of a person's journey, caring responsibilities, protected characteristics, and other individual circumstances. The decision to return to the workplace must be made in meaningful consultation with workers (including through trade unions or employee representative groups where they exist). A meaningful consultation means engaging in an open conversation about returning to the workplace before any decision to return has been made.

This should include a discussion of the timing and phasing of any return and any risk mitigations that have been implemented. It is vital employers engage with workers to ensure they feel safe returning to work, and they should not force anyone into an unsafe workplace.

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When employers consider that workers should come into their place of work, then this will need to be reflected in the COVID-19 workplace risk assessment and actions taken to manage the risks of transmission in line with this guidance. It is impossible to eliminate all risk but there is a lot that employers can do to minimise the risk to their employees. There is advice at [Workplace guidance for employers and employees: COVID-19](#) and information on the [Health and Safety Executive website](#).

Extra consideration should be given to those people at increased risk. Some groups of people may be at more risk of being infected and/or an adverse outcome if infected. View [higher-risk groups](#).

and include those who:

- are older
- have a high body mass index (BMI)
- have certain underlying health conditions
- are from some Black, Asian or minority ethnicity (BAME) backgrounds
- you should consider this in your risk assessment.

## **2.2. Protecting people who are defined on medical grounds as extremely vulnerable from COVID-19**

Information has also been provided for [People extremely vulnerable to COVID-19 who have been shielding: FAQs](#)

When the level of coronavirus cases is high across Wales, it is important for people in this category to work from home if at all possible- and where this can be achieved, roles should be adapted to support this.

If extremely vulnerable individuals cannot work from home, they should be offered the option of the safest available on-site roles, ensuring that their workplace environment is COVID-secure and are able to maintain the required 2 metres distance away from others. If you are unable to maintain a 2 metre distance from others you should take further mitigating actions to reduce the risk of transmission between staff and clients (see Section 2.8 for examples of

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actions that can be taken).

As for any workplace risk you must take into account specific duties for those with protected characteristics, including, for example, expectant mothers who are, as always, entitled to suspension on full pay if suitable roles cannot be

found. Particular attention should also be paid to people who live with individuals at increased risk.

## 2.3 People who need to self-isolate

No one should attend a workplace-setting if they:

- Have been told to self-isolate by **NHS Wales Test, Trace, Protect** because they have either tested positive for COVID-19 or have been in recent close contact with a confirmed/positive case of COVID-19, and are still within their self-isolation period as set out in the **guidance**;
- Have **COVID-19 symptoms**, however mild, and are waiting for a test result;
- Are a confirmed positive case and have isolated according to the **guidance**, but still have a fever, or have had a fever within the last 48 hours;
- Are a member of the same household or **extended household** as someone who has COVID-19 symptoms or who has tested positive for COVID-19, and are still within the self-isolation period as set out in the **guidance**;
- Have personally received a negative test for COVID-19 but are a member of the same household/extended household as someone who has tested positive, and are still within the self-isolation period set out in the guidance.

Self-isolation will require the individual to stay home and limit all unnecessary contact with others outside of their household. This includes not going to work. This is to ensure people who have tested positive for COVID-19 prevent passing it on to their friends, family and wider community, including their work colleagues.

If you have tested positive for COVID-19, or have been told to self-isolate by the NHS Wales Test, Trace, Protect (TTP) service you must stay at home. You are breaking the law and could be fined if you do not stay at home and self-isolate.

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- If one of your employees has a positive test result and/or is told to self-isolate by NHS Wales Test, Trace, Protect as a contact of a positive case then they should inform you, as their employer, as soon as is possible, and in line with your sickness policies, before they are due to next attend the workplace and they must not attend the workplace.
- You must allow or enable an employee to self-isolate if they have been tested positive or have been told to self-isolate by NHS Wales Test, Trace, Protect.
- If possible, and if they are well enough (if they are a confirmed case of COVID-19), you should support staff to work from home while self-isolating. If they cannot work from home then refer to the guidance for employers relating to [statutory sick pay due to COVID-19](#).

Staff must not return to work before their isolation period ends. You should not threaten the security of an employee's job if they have to undertake a period of self-isolation.

Before an employee returns to work after a period of self-isolation, you should confirm that:

- If they had symptoms, that they have had a test and received a negative result.
- If they were the confirmed case of COVID-19, they have completed their required period of self-isolation and do not have, or have not had a fever, in the last 48 hours;
- If a member of their household, or extended household or support bubble was the confirmed case of COVID-19, they have completed their required period of self-isolation and have not personally developed COVID-19 symptoms late in their isolation period.

If the answer to any of these scenarios is 'no', then the employee cannot return to work and you should not insist that they do.

Helping your staff to stay at home for the required self-isolation period will greatly reduce the overall amount of infection households can pass on to others in the community and therefore, potentially, the rest of your workforce.

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## **2.4 Equality in the workplace: your responsibility to make sure that nobody is discriminated against**

In applying this guidance, employers should be mindful of the particular needs of different groups of workers or individuals.

It is unlawful to discriminate, directly or indirectly, against anyone because of a protected characteristic including age, sex, disability, race or ethnicity.

Employers also have particular responsibilities towards disabled workers and those who are new or expectant mothers. The steps you should take:

- Understand and take into account the particular circumstances of those with different protected characteristics.
- You should involve and communicate appropriately with workers whose protected characteristics might either expose them to a different degree of risk, or might make any steps you are thinking about inappropriate or challenging for them.
- You should consider whether you need to put in place any particular measures or adjustments to take account of your duties under the equalities legislation.
- You should make reasonable adjustments to avoid disabled workers being put at a disadvantage, and assess the health and safety risks for new or expectant mothers.
- Making sure that the steps you take do not have an unjustified negative impact on some groups compared to others, for example those with caring responsibilities or those with religious commitments.

## **2.5 Working in groups: organising working patterns and working groups to reduce the number of contacts each worker has**

The steps you should take:

- As far as possible, where workers are split into teams or shift groups (particularly for practices that have extended their hours of business), or assigned to specific tasks, you should fix these teams or shift groups so that

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where contact is unavoidable, this happens between the same people.

- You should identify areas where people have to directly pass things to each other and finding ways to remove direct contact such as by using drop-off points or transfer zones.
- Use a defined process to help maintain physical distancing during shift handovers.
- Limit role/task rotation including remaining at a consistent therapy treatment station where possible.
- Create a schedule for staff detailing in advance how treatments will take place and what arrangements have been made with clients.
- You should assist the test and trace service by keeping a temporary record of your staff shift patterns for 21 days and assist NHS Test and Trace with requests for that data if needed. This could help contain clusters or outbreaks.

## **2.6 Work related travel: avoid unnecessary work travel and keep people safe when they do need to travel between locations**

The steps you should take:

- Avoid using public transport, and aiming to walk, cycle, or drive instead. If using public transport, it is mandatory for you to wear a **face covering** whilst you are travelling on public transport and in taxis. Advice on face coverings is set out in section 5.
- You should wear a face covering and minimise the number of people outside of your household or extended household travelling together in any one vehicle, using fixed travel partners, increasing ventilation when possible and avoiding sitting face-to-face.
- Avoid staff car sharing, where it cannot be avoided, you should take steps to minimise the risk of coronavirus such as increasing physical distancing as much as possible and wearing a face covering.
- Putting in place procedures to minimise person-to-person contact during deliveries to other sites.
- Minimising contact during payments and exchange of documentation, for example by using electronic payment methods and electronically signed and exchanged documents.

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## **2.7 Communications and training: making sure all workers understand COVID-19 related safety procedures and are kept up to date with how safety measures are being implemented or updated**

As the employer it is your responsibility to ensure your employees read, understand and fully comply with the COVID-19 related safety procedures. The steps you should take:

- Provide clear, consistent and regular communication to improve understanding and consistency of ways of working.
- Engage with workers and worker representatives to explain and agree any changes in working arrangements and keep them updated on any unforeseen impacts of changes to working environments.
- Ensure staff understand how to use and clean their PPE.
- You should be aware and focus on the importance of mental health at times of uncertainty.
- Use simple, clear messaging to explain guidelines using images and clear language, with consideration of groups for which English may not be their first language and those with protected characteristics such as visual impairments.

Under regulation 16, you are required to provide information to people on your premises about the measures they should follow to minimise the risk of exposure to coronavirus including the mandatory wearing of face coverings. This will include to clients as well as to staff, suppliers or trade bodies.

For home based settings or those providing mobile treatments in other people's homes

- You should communicate with households before arrival to discuss the steps you will be taking to reduce the risk of COVID-19, which will include wearing the appropriate PPE and the required measures to be taken by your client in order for the treatments to be provided safely in their home.

See guidance on [reasonable measures](#) and on [working in other people's homes](#) for more information.

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## 2.8 Physical distancing: making sure employees and clients maintain physical distancing guidelines

Most therapy treatments are conducted in small private rooms; the nature of the work is such that maintaining social distancing will not usually be possible when actively treating a client. In these circumstances, both employers, employees and the self-employed should do everything they reasonably can to reduce risk. This must include enhanced ventilation, increased cleaning protocols, reduced treatment times and appropriate gaps between clients.

Whilst it is recognised that Therapists generally work one-to-one with clients, there may be some occasions when other people need to be present in the room (for example clients who rely on lip reading or sign language to communicate or if a chaperone is required for a child or vulnerable adult). In these circumstances it may not be possible to maintain 2 metre distancing you must consider other measures and do everything you reasonably can to to minimise the risk of exposure to coronavirus. Wherever possible clients should attend appointments on their own.

Physical distancing applies to all parts of a business premises, not just the room where the treatment is delivered, it will also include a client's home when mobile close contact services are being provided. Waiting rooms, corridors and staircases, where applicable are often the most challenging areas to maintain physical distancing and it is your responsibility to ensure workers and clients are specifically reminded about the need to maintain safe distancing in these areas.

Steps you should take include:

- Leaving appropriate gaps between appointments to prevent the overlap of clients within the space.
- Using floor markings and introducing one-way flow in high traffic areas, entry and exit points, where possible.
- Collaborating with other businesses who may share the premises to minimise the numbers of people on site.
- Displaying posters / signage to remind both workers and clients to maintain physical distancing wherever possible, particularly in client interaction zones.
- Discussing with the client ahead of a mobile appointment in other people's

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homes to ask that physical distancing and other measures to minimise risk are maintained by other people in the household.

### **2.8.1 Common areas: maintaining physical distancing while using common areas**

The steps you should take:

- Staggering break times to reduce pressure on the staff break rooms or places to eat and ensuring physical distancing is maintained in staff break rooms.
- Installing screens to protect workers in areas where 2 metres distancing is not possible.
- Using safe outside areas for breaks.
- Reconfiguring seating and tables, such as in waiting areas, to optimise spacing to maintain 2 metres distancing and reduce face-to-face interactions.
- Considering use of physical distance marking for other common areas such as toilets, staff rooms, changing rooms and in any other areas where queues typically form.
- Scheduling appointments to avoid client overlap and congestion in waiting areas, particularly in establishments with smaller waiting areas. Only the client should be present in the same room for mobile appointments in the home, unless a chaperone is required, such as for a child or vulnerable adult. In these circumstances, physical distancing must be observed and the third party asked to wear a face covering.

### **2.8.2 Accidents, security and other incidents**

During these incidents the priority is safety.

Where possible, first aiders should try to assist from a safe distance, directing the casualty to do things for themselves. Where this is not possible, in an emergency scenario for example, it is unlikely to be possible to maintain a 2 metre distance.

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Individuals providing close contact first aid to others should pay particular attention to sanitation measures immediately afterwards including washing their hands.

If CPR is necessary to preserve life whilst waiting for the emergency services, both the Resuscitation Council's guidance and HSE's website currently advises compression only and the **early use of defibrillation equipment**.

The steps you should take:

- Review your incident and emergency procedures to ensure they reflect the social distancing principles as far as possible
- Consider the security implications of any changes you intend to make to your operations and practices in response to COVID-19, as any revisions may present new or altered security risks which may need mitigations

## Keeping people safe

### Section 3: What you should do to keep your clients and visitors safe – minimising the risk of spreading COVID-19

#### Whilst working in other people's homes

Everyone in Wales has an important part to play in helping to prevent the spread of coronavirus – and this means thinking carefully about the contact we all have with other people.

Because something is permitted does not always mean it is the right thing to do.

We are asking people to think about what is the most sensible thing to do to protect their family, friends and their communities, rather than thinking primarily about what they are allowed to do.

Under the current rules, there are limited circumstances in which people other than members of an extended household or support bubble can enter someone's home, or where they can enter somebody else's. The key ones are

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where work needs to take place in someone's home or for reasons of care or compassionate support.

However, Therapists who do not occupy any premises and operate solely as a mobile business are permitted to enter other people's homes in order to provide their therapies.

Where work takes place in other people's homes, it is important that this is managed in a safe way and that both the therapist and household members are well and have no symptoms of coronavirus.

In this instance mobile therapy businesses must take all **reasonable measures** to prevent the spread of coronavirus and consider the guidance on **working in other people's homes**. You should also follow the specific advice for mobile businesses set out in this guidance.

### **3.1 Wearing PPE (to protect the client from the practitioner and to protect the practitioner from the client) during COVID-19**

A Type II mask and clear visor which covers the forehead, extends below the chin, and wraps around the side of the face is acceptable PPE for providing:

- All treatments in the prone position.
- All treatments from the neck down and treatment on the ears and scalp with the client laying on their side.
- Below the chest only in the supine position.

Wearing PPE in these circumstances is a legal requirement and does not have any legal medical exemptions. Properly maintaining and managing the use of PPE is essential for the practitioner's wellbeing whilst they are wearing PPE. Masks and visors should be tried and tested to ensure that they fit the face properly; moisture build-up can be avoided if masks are fluid resistant. The cheapest option is not necessarily the best option. For further guidance on how to put on PPE safely see section 5.1.

## 3.2 Scalp and ear treatments

It should be noted that these treatments can only be provided safely on the basis that the therapist must wear a Type II mask and a clear visor and the treatments can only be completed if the therapist works side by side or from the back of the head and avoids prolonged periods of activity in the high-risk zone (the area directly in front of a client's eyes, nose and mouth) for the majority of the time that it takes to complete the treatments.

## 3.3 High risk close contact treatments on the face, which are extremely difficult to carry out safely during COVID-19, for both the practitioner and the client without the appropriate PPE under the current guidelines

You should therefore only carry out 'high risk' treatments if you are wearing the right grade PPE which is defined as a Fluid Resistant Surgical Face Mask (FRSM) plus eye protection (goggles or full face visor) and disposable gloves and apron and you have been trained in the use of PPE including how to put it on and take it off.

The following treatments require the enhanced PPE listed above:

- Any treatment on the face.
- Any treatment in the supine position from the chest up (including head, neck and shoulder girdle).

Whilst these therapies are not aerosol generating, they do require work in close proximity to the mouth and nose and the clients respiratory secretions i.e. through speaking, coughing and sneezing. Public health advice is clear that these are high risk activities that can bring practitioners within the 'high risk zone' for prolonged periods of time and are concerned that these treatments cannot be managed safely at this time without the right grade PPE.

As an employer, you have a legal responsibility to protect workers and others from risk to their health and safety. This means you need to think about the risks they face and do everything reasonably practicable to minimise them,

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recognising you cannot completely eliminate the risk of COVID-19.

You are under a duty to take all reasonable measures under regulation 16 and 17 of the Health Protection (Coronavirus Restrictions) (No. 5) (Wales) Regulations 2020 to minimise the risk of exposure to coronavirus, such as measures which maintain a 2 metre distance, limit close face-to-face interaction and maintain hygiene.

A reasonable measure in the close contact services setting would include not carrying out 'high risk' facial treatments if you are not wearing the right grade PPE (a Fluid Resistant Surgical Face Mask (FRSM) plus eye protection (goggles or full face visor) and disposable gloves and apron).

We all have a duty towards each other and will all need to work hard to keep Wales safe by following the expert advice and guidance to reduce the risk that further restrictions are needed.

Welsh Government recommends that you consider what a safe practice is and that you only provide treatments and services that can be delivered safely: **taking all reasonable measures to minimise the risk of exposure to coronavirus in workplaces and premises open to the public.**

Section 1.4 sets out what will happen if you do not comply with regulation 16 and 17 of The Health Protection (Coronavirus Restrictions) (Wales) (No. 5) Regulations 2020 and the relevant public health legislation and guidance to control COVID -19 and other public health risks. We will collaborate with Local Authority Environmental Health Officers to continue to closely monitor the provision of close contact services in Wales, and you should note that non-compliance with the legal requirement to wear the correct grade PPE and take reasonable measures when carrying out high risk treatments can result in a £1,000 fine being imposed on the business and could result in an improvement notice being served on the business, with the consequence of closure of the business if the notice is not complied with.

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### **3.4 The requirement for staff and clients to wear face coverings whilst they are in your business premises**

The wearing of a face covering in indoor public places, which includes close contact service settings, became a legal requirement in Wales from 14 September last year. The requirement will apply to everyone aged 11 and over – including customers and staff, unless they have a reasonable excuse not to wear a face covering. Please see section 5.3 for full details.

If the practitioner is wearing the right grade PPE - a Fluid Resistant Surgical Face Mask (FRSM) plus eye protection (goggles or full face visor) and disposable gloves and apron, clients will be permitted to remove their face covering temporarily for treatments on the face. Clients are only permitted to remove their masks solely at the point the facial treatment commences and for the shortest possible time period and where the therapist is wearing full enhanced PPE (classed as medical grade).

### **3.6 Booking appointments: measures that will keep people safe and allow us to track the virus**

Therapy businesses should endeavour to do so on an appointment only basis. No walk-ins. Measures to contain COVID-19 outbreak is being supported by NHS **Test, Trace, Protect**.

Any businesses operating in high risk settings are required to collect contact information from their clients and visitors. Close contact services are considered to be high risk settings because clients will come into close contact with people outside of their extended household or support bubble if they have formed one.

Collecting contact information helps to identify people who may have been exposed to the virus and are asymptomatic (i.e. are not yet displaying symptoms). Containing outbreaks is crucial to reducing the spread of coronavirus, protecting the NHS in Wales and saving lives. This will support the country in returning to, and maintaining, a more normal way of life.

The legal requirement is to collect the person's name and information sufficient

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to enable the person to be contacted, to inform them that they may have been exposed to coronavirus at the premises (including a telephone number and the date and time at which the person was at the premises).

You are under a duty to collect your clients' and visitors details and share with Test, Trace & Protect. If they are not willing to share them, you should not allow them on your premises.

You should keep a temporary record of your clients and visitors for 21 days. The collection of contact information is specifically regarded as a "reasonable measure" to be taken under Regulation 16.

If you do not already have systems for recording your clients and visitors you should do so. You may wish to see guidance on maintaining **records of staff, customers and visitors** to support NHS Test, Trace, Protect.

The steps you should take before you start booking appointments:

- You should operate a pre-booking only - walk-in appointments should not be permitted.
- You should calculate the maximum number of clients that can reasonably follow physical distancing guidelines and seek to limit the number of appointments at any one time accordingly. Take into account total floorspace as well as likely pinch points and busy areas.
- Determine if schedules for essential services and contractor visits can be revised to reduce interaction and overlap between people.

The steps you should take when booking appointments:

- If the booking is for a treatment to the face and you have determined that you will not be able to follow the guidance for the provision of high risk treatments set out in section 3.3 you should inform the client that you will be unable to provide the treatment(s) safely to minimise risk of both the client and the practitioner's exposure to coronavirus.
- You should inform the client that if when on the day of the appointment they are exhibiting symptoms of COVID-19 or have been tested positive or are waiting for the results of a COVID -19 test or are self-isolating they should let

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you know on the day and not keep the appointment.

- You should also inform the client that you have a duty to record their contact details and will be asking for their contact information when they arrive, if you do not already hold their information.
- Clients should be advised to arrive promptly for appointments to minimise delays later in the day, but not too early so as to not overlap with other clients.
- You should ask the client if they can attend on their own, where possible, to avoid compromising social distancing requirements.

A customer action card has also been produced to remind customers of their responsibilities to help support the close contact services sector to reduce the risk of Covid-19 transmission. It has been published on the website alongside this guidance to assist you when booking appointments.

48 hours before the appointment is due to take place you should contact the client to check if they:

- have tested positive or had any coronavirus symptoms within 10 days of the appointment date.
- are living in a household in which someone has developed coronavirus symptoms in 14 days prior to the appointment date.
- have been contacted by Test, Trace and Protect and told to self-isolate in the 14 days prior to the appointment date.

In any of the above situations, you must reschedule the appointment.

On the day of the appointment, you should check they:

- have not tested positive for coronavirus in the last 10 days
- are not exhibiting symptoms of coronavirus
- are not waiting for the result of a test for coronavirus?

Symptoms include:

- a new continuous cough (this means coughing a lot for more than an hour, or three or more coughing episodes in 24 hours - if they usually have a cough,

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is it worse than usual)

- a high temperature (this means do they feel hot to touch on their chest or back – they do not need to measure their temperature)
- a loss of, or change in, your normal sense of taste or smell? (this means they have noticed they cannot smell or taste anything, or things smell or taste different to normal)

Most people with coronavirus have at least one of these symptoms. **If the client has any of these symptoms**, however mild, you should not proceed with the appointment and suggest they self-isolate, **apply for a test** and reschedule their appointment.

For all appointments on the day:

- You should inform the client that you have their contact details and will be obliged to pass their details to NHS **Test, Trace, Protect** if asked to do so.
- All clients over the age of 11 must wear a face covering (unless they are exempt see section 5.3) whilst they are on your premises, if they do not have one you should provide one for them.
- You should encourage clients to use hand sanitiser or handwashing facilities as they enter the premises or before the treatments.
- If at all possible persons attending for appointments should not attend with any other person(s) to avoid compromising social distancing requirements.
- Adjusting how people move through the premises to reduce congestion and contact between clients, for example one-way flow. This may only be possible in larger establishments
- Ensuring any changes to entrances, exits take into account reasonable adjustments for those who need them, including disabled clients.
- Maintaining physical distancing in waiting areas when clients wait for their appointments. When waiting areas can no longer maintain physical distancing, consider moving to a 'one-in-one-out' policy.

If you are a mobile business you should:

- Check 48 hours in advance if anyone in the house is **self-isolating** or at **increased risk**.
- Not attend the house if someone is self-isolating, but rearrange the

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appointment for when their period of self-isolation is complete.

- Check that no-one in the home has coronavirus symptoms or is waiting for a coronavirus test.
- Wear appropriate PPE for the treatment as defined above.
- Ask the client to ventilate the treatment area or room for 15 minutes prior to your arrival and if possible have good fresh air ventilation throughout the appointment.
- Ask the client if possible, to ensure that only you and the client are in the room where the treatment(s) is taking place. Unless a chaperone is required, such as for a child or vulnerable adult. In this instance, physical distancing should be observed and the third party asked to wear a face covering.
- For your own protection you might also ask the client if they would be prepared to wear a face covering for the duration of the time you are in their home.

### **3.7 Client toilets: ensure and promote good hygiene, physical distancing, and cleanliness in toilet facilities**

Public toilets, portable toilets and toilets inside premises should be kept open and carefully managed to reduce the risk of transmission of COVID-19.

The steps you should take:

- Using **signs and posters** to build awareness of good handwashing technique, the need to increase handwashing frequency and to avoid touching your face, and to cough or sneeze into a tissue which is binned safely, or into your arm if a tissue is not available.
- To enable good hand hygiene consider making hand sanitiser available on entry to toilets where safe and practical, and ensure suitable handwashing facilities including running water and liquid soap and suitable options for drying (paper towels if possible) or hand dryers are available.
- Signage should be provided on the requirement to maintain a 2 meter distance from other clients and therapists when not receiving a therapy treatment. Adopt measures to limit the number of users at any one time. Consider the use of clear physical distancing marking for queues, and the adoption of a limited entry approach, with one in, one out (whilst avoiding the

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creation of additional bottlenecks).

- Keep the facilities well ventilated, where possible doors to toilet blocks may be wedged open to maximise fresh air, to allow users to assess numbers inside, and to limit hand contact.
- Setting clear use and cleaning guidance for toilets, with increased frequency of cleaning in line with usage, you might want to refer to the following guidance [GOV.UK: COVID-19: cleaning of non-healthcare settings outside the home](#). Use normal cleaning products, paying attention to frequently hand touched surfaces, and consider use of disposable cloths or paper roll to clean all hard surfaces.
- Special care should be taken for cleaning of portable toilets and larger toilet facilities.
- Putting up a visible cleaning schedule can keep it up to date and visible. Providing more waste facilities and more frequent rubbish collection.

For further advice see Welsh Government guidance: Providing Safer toilets for public use: Coronavirus which provides guidance on the safe management of toilets used by the public during the coronavirus pandemic including for commercial or business premises where [toilet access is provided to the public](#).

### **3.8 Providing and explaining available guidance: making sure people understand what they need to do to maintain safety**

The steps you should take:

- Providing clear guidance on expected client behaviours, social distancing and hygiene when scheduling their appointment, and on arrival, for example. Explaining to clients that failure to observe safety measures may result in services not being provided. Promotion of this message could be done via your web pages or other social media channels.
- Displaying posters or information setting out how clients should behave on your premises to keep everyone safe. Consider the particular needs of those with protected characteristics, such as those who are hearing or visually impaired.
- Ensuring latest guidelines are visible throughout the entire premises.

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### **3.9 Receiving and dispatching goods and products: maintaining physical distancing and avoid spreading the virus on surfaces when goods enter and leave the premises**

Steps you should take:

- Minimise unnecessary contact for deliveries. For example, non-contact deliveries where the nature of the product allows for use of electronic pre-booking.
- Consider ways to reduce frequency of deliveries, for example by ordering larger quantities less often.
- Where possible and safe, having single workers load or unload vehicles or meet delivery people at the front door.
- Scheduling deliveries for outside of client appointment times.

Re-stocking/replenishing outside of workplace operating hours.

## **Cleaning**

### **Section 4: What you should do to keep your workplaces free of COVID-19**

#### **4.1 Ventilation**

Those in control of a premises have a **legal duty** to ensure effective ventilation. The availability of continuous fresh air is a key factor in reducing the spread of COVID-19. Natural ventilation via windows, doors or vents should be used as far as possible. Where centralised or mechanical ventilation is present, recirculatory systems should be adjusted to full fresh air, if this is not possible systems should be operated as normal. Where ventilation units have filters present ensure enhanced precautions are taken when changing filters. (For further information on ventilation see section 1.3).

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## 4.2 Cleaning the workplace: making sure that any site or location that has been closed or partially operated is clean and ready to restart

Steps you should take prior to opening:

- Checking whether you need to service or adjust ventilation systems, for example, so that they do not automatically reduce ventilation levels due to lower than normal occupancy levels.
- Most air conditioning systems do not need adjustment, however where systems serve multiple buildings, or you are unsure, advice should be sought from your heating ventilation and air conditioning (HVAC) engineers or advisers.
- It is important that, prior to reopening all the usual checks are undertaken to make the building safe. If buildings have been closed or had reduced

occupancy during the COVID-19 outbreak, water system stagnation can occur due to lack of use, increasing the risks of Legionnaires' disease. [HSE guidance covering water management and legionella is available](#).

- Drinking Water Inspectorate's guidance on bringing buildings back into use after a period of disuse may be helpful. The guidance covers a range of quality issues that should be considered the guidance is available on the DWI's general web page.
- Natural ventilation via windows or vents should be used as far as possible. Where centralised or mechanical ventilation is present, recirculatory systems should be adjusted to full fresh air, if this is not possible systems should be operated as normal. Where ventilation units have filters present ensure enhanced precautions are taken when changing filters.

## 4.3 Keeping the workplace clean: preventing spreading the virus by touching and contaminating surfaces

The steps you should take:

- Spacing appointments to allow for thorough cleaning of work areas and equipment between clients, using your usual cleaning products.

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- Frequent cleaning of objects and surfaces that are touched regularly, including door handles or staff handheld devices, and making sure there are adequate disposal arrangements for cleaning products.
- Sanitising any reusable equipment, including client chairs, treatment beds, and waiting area seating and equipment used after each appointment, and at the start and end of shifts.
- All items in contact with the client must be disposable or single use and washed at least 60°C
- Advising staff not to wear their uniforms at home or to and from the workplace, to change uniforms on a daily basis and to wash immediately after use.
- Cleaning high touch objects and surfaces such as door handles

#### **4.4 Hygiene (handwashing, sanitation facilities): help everyone keep good hygiene through the working day**

Steps you should take:

- Using signs and posters to build awareness of good handwashing technique, the need to increase handwashing frequency and avoiding touching your face.
- Adopting good handwashing technique and increasing handwashing in between appointments. For mobile operators, in the absence of handwashing facilities, you must use hand sanitiser.
- Providing regular reminders and signage to maintain hygiene standards.
- Providing hand sanitiser in multiple locations in premises in addition to washrooms.
- Setting clear use and cleaning guidance for toilets to ensure they are kept clean and social distancing is achieved as much as possible.
- Enhancing cleaning for busy areas.
- Providing more waste facilities and more frequent rubbish collection.
- Providing hand drying facilities – either paper towels (preferably paper towels) or electrical dryers.

#### **4.5 Changing rooms and showers: minimising the risk of spreading**

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## **the virus in changing rooms and showers**

It is advised that showers should only be provided for staff, and clients if absolutely necessary at this time.

Steps you should take:

- Where shower and changing facilities are required, setting clear use and cleaning guidance for **showers, lockers and changing rooms** to ensure they are kept clean and clear of personal items and that physical distancing is achieved as much as possible.
- Introducing enhanced cleaning of all facilities regularly during the day and at the end of the day.

## **4.6 Handling products, goods and other materials: reducing the spread of the virus through contact with objects in the premises**

The steps you should take:

- Encouraging increased handwashing and introducing more handwashing facilities for workers and clients or providing hand sanitiser where this is not practical.
- Implementing enhanced handling procedures of laundry to prevent potential contamination of surrounding surfaces, to prevent raising dust or dispersing the virus.
- Putting in place picking-up and dropping-off collection points where possible, rather than passing goods hand-to-hand.
- Enforcing cleaning procedures for goods and products entering the site.
- Regularly cleaning equipment. Cleaning should also take place before and following client use.
- Minimising person-to-person contact when accepting deliveries by creating pick-up and drop-off collection points for deliveries entering the premises.

Ensuring that equipment entering a person's home is thoroughly cleaned before use and between clients, with usual cleaning products.

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# Personal Protective Equipment (PPE) and face coverings

## Section 5. The use of Personal Protective Equipment (PPE) and face coverings

PPE protects the user from health and safety risks at work. It can include face masks, eye protection including goggles and face visors, disposable gloves, gowns and aprons.

In Section 4 of this document we described the steps you need to take to manage COVID-19 risk in the workplace. When managing the risks of

COVID-19, additional PPE beyond what you usually wear will not be beneficial in the majority of workplaces. This is because COVID-19 is a different type of risk to the risks you normally face in a workplace, and needs to be managed through social distancing, hygiene and fixed teams or partnering.

Physical distancing and hygiene measures are by far the most effective ways to protect yourself and others from COVID-19, however for people who are providing close contact services (such as those covered in this guidance because of the period of time spent in close proximity to a person's face, mouth and nose), it is likely to be difficult to maintain physical distancing, they should therefore wear further protection in addition to any that they might usually wear.

This should take the form of a Type II mask and a clear visor that covers the face and provides a barrier between the wearer and the client from respiratory aerosols and droplets caused by breathing, sneezing, coughing or speaking. Visors must fit the user and be worn properly. It should cover the forehead, extend below the chin, and wrap around the side of the face. These are a legal requirement and do not have legal medical exemptions. You may substitute a clear face visor for goggles however they should fit your face properly with no gaps between the goggles and your skin.

Both disposable and re-usable face visors are available. A re-usable face visor

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should be cleaned and sanitised between appointments and at the start and end of the day using normal cleaning products.

Type II face masks are not clinical grade PPE but will provide a physical barrier to minimise contamination of the mouth and nose when used correctly.

Properly maintaining and managing the use of PPE is essential for the practitioner's wellbeing whilst they are wearing PPE. Masks and visors should be tried and tested to ensure that they fit the face properly; moisture build-up can be avoided if masks are fluid resistant. The cheapest option is not necessarily the best option.

## **5.1 Guidance on how to put on, wear and remove a Type II face mask safely**

Always ensure you are hydrated before putting a face mask on. Putting on your face mask:

- wash your hands thoroughly with soap and water for 20 seconds, or use hand sanitiser, before putting a face mask on.
- if the mask has ties (instead of ear loops), make sure it is securely tied over your ears at the crown and nape of the neck.
- once on, make sure the mask is extended to cover your mouth and chin.
- ensure the mask is flat against your cheeks. With both hands, mould the metal strip over the bridge of your nose.

### **Safe use of a face mask:**

Keep your hands away from your face and face mask. When you need to remove your mask (e.g. to take a drink or eat) then you should replace it with a new face mask before continuing to work. Face masks should:

- cover both nose and mouth.
- not be allowed to dangle around the neck.
- not be touched once on.
- be changed if they become moist or damaged, or if difficult to breathe

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through.

- be worn once and then discarded safely, ideally into a non-touch and self-closing bin.

### **Taking off your face mask:**

Safe removal of a face mask is important.

1. wash your hands or use hand sanitiser.
2. untie or break the bottom ties, followed by top ties or elastic.
3. gently pull the mask away from the face and remove it by handling the ties only.
4. discard the mask safely, ideally into a non-touch and self-closing bin.
5. wash your hands again.

In instances where you are contacted via the NHS Test, Trace, Protect service, having been in contact with someone who has tested positive for COVID-19, you will still need to self-isolate even if you are wearing a visor and Type II face mask at work. This is because the risk of transmission cannot be ruled out, even if wearing a visor and mask reduces that risk.

## **5.2 PPE for 'high risk' treatments on the face**

We strongly advise that you do not provide these treatments which are extremely difficult to carry out safely during COVID-19, for both the practitioner and the client without the appropriate grade PPE under the current guidelines.

You should only consider carrying out the treatments listed in section 3.3 if you are wearing:

- a Fluid Resistant Surgical Face Mask (FRSM) plus eye protection (goggles or full face visor);
- a disposable apron and gloves;
- have had the appropriate training in the use of PPE, including how to put it on and take it off.

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The following links will take you to COVID-19: infection prevention and control guidance produced by Public Health England, Wales and Scotland which covers the use of PPE and guidance on how to put PPE on and take it off (donning and doffing):

- [COVID-19: infection prevention and control guidance Appendix 2](#)
- [Putting on personal protective equipment \(PPE\) for non-aerosol generating procedures \(AGPs\)](#)
- [Taking off personal protective equipment \(PPE\) for non-aerosol generating procedures \(AGPs\)](#)

The most effective methods of preventing the transmission of COVID-19 are still physical distancing and regular handwashing. These steps must still be followed as much as possible, even when practitioners are wearing protective equipment.

Therapists who wear enhanced medical grade PPE as part of their normal daily practice may not be required to self-isolate in instances where they are contacted via the test and trace service if identified as having been in contact with someone who has tested positive for COVID-19. However, Therapists will be aware that the wearing of PPE does not automatically exempt an individual from having to self-isolate if issues have been identified in relation to the donning and doffing of equipment which results in compromises. This is because the risk of transmission cannot be ruled out. Therapists who do not wear medical grade PPE, are likely to have to self-isolate.

### **5.3 Face coverings**

Since the 14 September 2020 it is a legal requirement for face coverings to be worn in all indoor public places across Wales.

Face coverings will be required in all indoor public places, for both customers and staff working in those indoor public areas. This includes a very wide range of locations, such as shops and shopping centres, places of worship, hairdressers and salons, cinemas and museums, gyms and leisure centres, and anywhere that is open to members of the public.

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It would also include any public areas within buildings that are otherwise closed to the public – for example a reception area of an office building.

The only indoor public areas where face coverings will not be required are where you are inside a place to eat or drink, for example, cafés, restaurants and pubs. But where food and drink is only being served for consumption in part of the premises – for example, a café which also offers take away services – you will need to wear a face covering in the parts of the premises where people are not eating or drinking.

Employers will also be required to mandate the use of face coverings in indoor workplaces where social distancing cannot be maintained, unless there are strong reasons not to. You may therefore find you are required to wear a face covering at work even in places which are not open to the public.

The requirement will apply to everyone aged 11 and over – including customers and staff. However, you may have a reasonable excuse not to wear a face covering if (for example):

- you are not able to put on or to wear a face covering because of a physical or mental illness, or because of a disability or impairment;
- you are accompanying somebody who relies on lip reading where they need to communicate; or
- you are escaping from a threat or danger and don't have a face covering.

## **Removing face coverings for treatments on the face**

Only if the practitioner is wearing the right grade PPE - a Fluid Resistant Surgical Face Mask (FRSM) plus eye protection (goggles or full face visor) and disposable gloves and apron, clients will be permitted to remove their face covering temporarily for treatments on the face. Under no circumstances should the client's face covering be removed if the practitioner is not wearing the enhanced level of PPE. If face coverings are lifted or removed the therapist should restrict the time spent working in the high risk zone to the shortest possible time and the mask must be reapplied at the earliest opportunity.

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In general the face covering should be kept on at all times whilst the client is in your premises. But they may have a reasonable excuse to remove a face covering temporarily (again, for example):

- take medicines;
- to eat or drink for medical purposes; or
- to avoid harm or injury, either to yourself or others – for example to get somebody's attention about a danger.
- due to any relevant physical conditions.

Most people do not need to eat or drink on short trips away from home, but this may be different for somebody who is diabetic, for example, or in hot weather.

Whether somebody has a reasonable excuse not to wear a face covering will not always be obvious. Disabilities and impairments are not always visible to others, including conditions such as autism and ADHD, and respect and understanding should be shown to those who have good reasons not to wear face coverings.

Those who have an age, health or disability reason for not wearing a face covering are not being asked to give any written evidence of this. They do not need to seek advice or request a letter from a medical professional about the reason for not wearing a face covering.

Carrying an exemption card is a personal choice and is not necessary in law.

Employers should support their workers in using face coverings safely. We are advising the use of three-layer, non-medical face coverings. Welsh Government has produced guidance on [how to make three-layer face covering](#) and [Frequently Asked Questions](#).

This is in line with the [World Health Organisation's latest technical advice](#).

This means telling workers:

- wash your hands thoroughly with soap and water for 20 seconds or use hand sanitiser before putting a face covering on, and before and after removing it.
- when wearing a face covering, avoid touching your face or face covering, as

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- you could contaminate them with germs from your hands.
- change your face covering if it becomes damp or if you've touched it.
  - continue to wash your hands regularly.
  - change and wash your face covering daily.
  - if the material is washable, wash in line with manufacturer's instructions. If it's not washable, dispose of it carefully in your usual waste.

## Test, Track and Protect Service

### Section 6. The NHS Wales Test, Track and Protect Service

6.1 Businesses and people practicing in the areas covered by this guidance need to conform to the requirements of the NHS Wales Test.

#### Track and Protect Service

You should inform customers that their data will be passed to this service in the event of a case, cluster or outbreak of coronavirus (i.e. more than one new case of coronavirus) that is tracked back to your premises. The service will ask for these records only where it is necessary, and if asked to do so, you are required to share the information of staff, customers and visitors with the NHS Wales Test, Trace, Protect service as soon as possible. You should not share the information that has been collected for this purpose with anyone else.

Further general information can be found here:

- [Keeping records of staff, customers, and visitors: test, trace, protect](#)
- [Contact tracing: your questions](#)
- [Employers: coronavirus test, trace, protect guidance.](#)

## Coronavirus financial support

Details of coronavirus support for businesses can be found on the [Business Wales website](#)

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