



Covid-19 PCU Resource

**Therapy in the Pandemic - Is it Safe to Return to My
Workplace? (and other Issues regarding Face to Face work)**





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Introduction

The Covid-19 pandemic has not gone away, PCU members are asking (and might be considering) whether it is safe to return to work with clients, as the Government signals that it is safe to shop, get your hair but not nails done drive a bus and be served in a pub!

Some of us are being forced to consider returning to work in unsafe workplaces, many are eager to return to face to face working. Some members may not have stopped working face to face. Many of us are working online and may be for some time to come.

With many of us disproportionately affected by the virus, including Black African and Asian people, older people, people with disabilities and those of us with health conditions, PCU has put together this short digest.

Risk Assessment, Health and Safety Planning, and the rights of both clients and therapists are at the heart of this digest.

We are signposting members to resources rather than totally rewriting them - as there is a lot of good information out there - and quite frankly - why re-invent the wheel? Time is a precious resource - once it's gone we can't get it back.

So please do follow hyperlinks when you see them in this document as they will lead to more detailed information.

Here's what we know...The Laws in England Ireland Scotland and Wales differ so our approach to opening back up and what we can and can't do has to be different.

We do need to consider the risks carefully and where this is not being considered for us to take advice. If in doubt do a risk assessment. Think it through with your clients, your colleagues and your employers. We are not lemmings or sheep so remember that a deadly virus still exists regardless of what capitalism or our insurance companies tell us.

Risk Assessment - Why, How, When, What and Who?

What is a Risk Assessment? This Blog starts to break down the issues in Risk Assessment for Therapists by asking the Big question on all our lips when contemplating working face to face - [But is it safe?](#) it is a useful article because it allows us to contemplate the risk assessment as an approach. The outcome of a Risk Assessment during a pandemic such as Covid may result in our concluding that it is safe for us to return to work face to face, and for many of us that it still isn't. The Government are talking about shops, and facilities as being Covid Secure - we should be wary about this push for capitalism over safety.

Risk Assessment is therefore a vital and dynamic process in post lockdown planning for therapists and we need to understand what good risk assessment looks like. No - we cannot account for every risk and every case scenario but we can arguably contemplate how we will anticipate something like safe practice / Covid Security to use government speak and apply it to each person/ place/ scenario we work in. Remember there is no such thing as a generic Risk Assessment, but here are some things we should be contemplating at least...

- ★ **Maintaining Distance - whether we work face to face at all, the 2 metre rule and amelioration of it eg mask wearing**
- ★ **Infection Control - ventilation, seating, hand washing, sanitisers, travel, room layout and cleaning**
- ★ **Thinking About Specific Risks and Risk Factors for specific groups eg pregnancy, health, vulnerability.**
- ★ **The thorny Issue of Contact Tracing and Confidentiality.**

A Risk Assessment Form might look like the one that appears [here](#) that's the How - generally Risk Assessment involves thinking through, planning for, contemplating and writing down risks.

It's not the same as crossing the road - something we risk assess every day. It is a much slower process and in Face to Face working - the Why is Obvious - because Covid is a deadly virus and we don't want to be responsible for death/illness of our clients / ourselves or for creating risk within vulnerable communities or individuals. At a time when 43,575 people have died from covid in the UK alone our role is not to cause or contribute to harm. Good Risk Assessment allows us to contemplate fully before we take action to 'open up' our practice.

Employers, Landlords and Organisations that we work for should also be contemplating and writing Risk Assessments with you and in consultation with you.

When you think of your practice you will also have to think about each client and yourself to do this properly - that's the Who

The When of Risk Assessment is simple - revisit any Risk Assessment you have drafted whenever events change.

What is not such a broad question - but Risk Assessing what is relevant is important to do well.

The next page shows how others are doing it...



Risk Assessment Formats

Faculty of Occupational Medicine have developed a [risk assessment framework](#) for vulnerable NHS staff. Their guidance could be applied to other settings.

As BAME people are [disproportionately affected by COVID-19](#), BAMEed have put together [guidance](#) around risk assessment which schools - as part of their duty of care - should carry out for BAME staff, students and visitors (including counsellors). Their Risk Assessment Form is really quite comprehensive in terms of the areas that should be contemplated during a Risk Assessment.

This [example checklist from Unite](#) can be used to show the general steps a business must take for risk assessment - it isn't definitive but it is better than nothing at all.

The Health and Safety Executive - HSE has information, guidance and templates for risk assessment at [hse.gov.uk](https://www.hse.gov.uk)

A PCU Risk assessment flowchart to help with planning and form can be downloaded and a proforma Risk Assessment form appears at the end of this document.



Health and Safety Planning and Your Rights - wherever you work

For employers or employees, [this](#) page outlines and signposts to govt & other guidance around employer obligations in terms of health & safety, non-discrimination, data protection, employee absence or infection with COVID-19, disciplinary action, and government assistance to employers.

This [legal guide from cloisters](#) to returning to work is really useful

The Irish Association for Counselling and Psychotherapy has [these](#) return-to-work guidelines for its members based on government guidance.

In Scotland the law is different [here's some advice from the CAB](#), And here's a guide to [what you can and cannot do](#) in Scotland under lockdown.

TruthLegal have put together a useful [guide](#), with advice for individuals and employers, including advice around your statutory rights e.g. am I within my legal rights not going to work if I'm worried about COVID-19.

TUC have [guidance](#) for employees around knowing what minimum steps their employers should take in terms of risk assessment.

The UK government has published detailed [guidance](#) for close contact services that can be applicable to therapists although we are not as yet recognised under the lists of employees and we are not considered 'essential workers' unless we work in the NHS

UKCP has posted some [guidance](#) and [resources](#) if you're considering returning to work.

At this point in time BACP have a FAQ page on face to face work - worth noting that you may not be insured for working with clients face to face: [FAQs about coronavirus for counsellors](#)

Insurers - all have a different take on this too so find out what yours is saying by calling them and asking.

Help - where to get it

[United Legal Access](#) provide free legal advice around issues including employment law, and race equality.

If you are a PCU member and you feel you are being forced into unsafe working conditions please contact us directly.

If you decide to take legal action, Truthlegal have **[preferential No Win No Fee agreements for PCU members.](#)**

[ACAS](#) has useful advice on returning to work including how & where to raise an issue

If you feel your workplace is unsafe, some possibilities: contact your employee rep, contact your trade union, contact HSE by phone or **[this form](#)**

Whether you are in Private Practice, or working for an organisation or hiring premises from someone - you should not be making these decisions alone - that's what supervision is for so use it to contemplate these issues.

If you feel you are being bullied by your landlord into paying for rent for your therapy room without them showing any signs of risk assessment contact PCU for advice before you contact the HSE

If your employer is jumping the gun, **[ACAS](#)** has guidance on how to resolve and raise issues at work

Groupwork: the **[government's guidance for offices](#)** may be useful for people considering face-to-face groupwork - see the section on meetings

Working in Schools: Unison has useful **[guidance re working in schools.](#)**

Art and Play Therapy - there is useful info **[here](#)** re using art materials from over the pond (Thanks AAT)



Additional Resources

Some guidance issued on close contact working might be useful for us to bear in mind but remember it does not specifically apply to therapists - unless you are doing body work

<https://assets.publishing.service.gov.uk/media/5ef2889986650c12970e9b57/Keeping-workers-and-clients-safe-during-covid-19-close-contact-services-230620.pdf>

This link is useful if you are working in the gig economy, and are in precarious employment

<https://iwgb.org.uk/en/post/judicial-review-to-force-uk-government-to-extend-health-and-safety-rights-to-precarious-workers>



Acknowledgements

None of us are experts about working in a pandemic and nothing in this is inciting people to break the law or return to face to face working if you are not able to do that

We have put this together in a hurry. There never is enough time, when we are under stress and pressure to come up with the right answers as a Union - but there is always time to Risk Assess.

No one is perfect and you will never contemplate every risk - so good enough Risk Assessment over time is better than no Risk Assessment at all.

Events might need to be recorded and assessed differently so an Event Risk Assessment can be found [here](#)

Thanks to the experts at: [AAT](#), [ACAS](#), [BACP](#), [BAMEed](#), [Bird & Bird](#), [Citizens Advice](#), [Cloisters](#), [FOM](#), [Gov.uk](#), [HSE](#), [IACP](#), [IWGB](#), [NHS Confederation](#), [Therapy Meets Numbers](#), [TruthLegal](#), [TUC](#), [UKCP](#), [Unison](#), [United Legal Access](#)

We are grateful to Kris, Sana and Eleanor for labouring over this guide

Please share but acknowledge where you got this from



Quick Check Flowchart for assessing risk

IDENTIFY



ASSESS



CONTROL



RECORD



REVIEW

What might cause harm, what constitutes a hazard.

For example:

Safe/unsafe work practices.

Physical environment.

Impact of hazard on people involved in the work, including clients.

How likely is it someone will be harmed and how?

Assess:

Current controls
What else needs to be done?

Who will act and when by?

Carry out the actions you have identified to reduce the risk.

Balance level of risk against the measures needed to control the risk.

You cannot remove all risk, but you do need to do all that is reasonably practicable.

If you employ 5 or more people you must record significant findings, including:

The hazards identified.
Who might be harmed and how.

What you are doing to control the risks.

Regularly review the controls you have put in place.

Consider:

The effectiveness of the controls

Any new risks?

Are the controls still needed?



PCU Risk Assessment Form

The following form is a way to think through, record and complete a written Risk Assessment for your practice or workplace

What are the risks?	Who is at risk and how?	What are the current controls	What extra controls could be put in place?	Who is responsible for the action?	When should action be completed	Date completed



PCU Event Risk Assessment

Event:	Location:	Completed by:	Date of Assessment
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Event description:

Concern	What is the risk?	Who's at risk?	Level of risk before controls	Controls	Person responsible	Level of risk after control