

## **Returning to In Person Practice – The Issue of Face Coverings/Masks + Links to the Self Employment Payment.**

### **Face Coverings/Masks**

Apologies that due in part to annual leave, we have been somewhat late to issue guidance on the use of face coverings/masks. Many of you will be aware some counselling and psychotherapy professional bodies are recommending that counsellors and clients wear face coverings /masks when meeting indoors. As with other directives on Covid-19 the rules relating to face coverings and masks vary between England, Scotland, Wales and Northern Ireland.

Wearing face coverings/masks presents considerable challenges to working therapeutically and understandably we are concerned on behalf of our members for the welfare of some clients who may find this new requirement distressing and/or counter therapeutic.

### **What are the government guidelines?**

<https://www.gov.uk/government/publications/face-coverings-when-to-wear-one-and-how-to-make-your-own/face-coverings-when-to-wear-one-and-how-to-make-your-own>

Through careful reading of the current government guidelines, a reasonable conclusion to come to is that counselling and psychotherapy **do not fall within the categories of settings where there is a clear legal obligation** to wear a face mask or face covering. Rather we have concluded that the use of face coverings **is recommended**. The picture remains somewhat unclear however as the words used in different places on gov.uk in relation to wearing face coverings/masks in indoor settings, when contact happens between people who would not normally meet, vary from 'should', through 'strongly advised' and 'expected'. We have therefore written to the Department of Health and Social Care explaining the distinct challenges associated with wearing face coverings/masks in therapy and seeking urgent confirmation that the wearing of face coverings/masks in a counselling and psychotherapy settings is not a legal obligation. It may take some time to hear back from them.

<https://www.gov.uk/government/publications/face-coverings-when-to-wear-one-and-how-to-make-your-own/face-coverings-when-to-wear-one-and-how-to-make-your-own>

### **ACC's guidance with regard to face coverings/masks in therapy**

ACC's recommendation with regard to face covering/masks is that you discuss the situation with any client that you are intending to meet with in person and if your client has an issue with the wearing of face coverings/masks in therapy you make an ethical decision based on the clients best interest with due regard for your own wellbeing.

It's helpful to be aware that the government guidelines state that even in places where there is legal obligation to wear a mask, you can remove your mask if there is a 'reasonable excuse' for doing so. In addition, the lists of reasons for exemption (included in the link above) include 'mental illness' and 'distress'.

The following steps give an outline of how you may wish to work through the issues associated with using face coverings/masks in your practice. Counselling affiliates will need to determine what their organisational policy will be – bearing in mind their health and safety at work responsibilities to their employees and volunteers (see affiliates below).

### **1. Counsellors self-care:**

- You consider your own personal health risk profile and whether it is your decision to follow the government's recommendation and wear a mask in the session, irrespective of your client's preferences.
- You may qualify for an exception from wearing a mask and should check this.
- Similarly you may wish to consider your position with regard to your clients wearing masks (remember they may also have an exemption) and determine whether you want to proceed with face to face work with a client who does not want to or cannot wear a mask.

### **2. The Setting**

- As with our previous guidance you must ensure that the counselling setting is as 'Covid Secure' as you can reasonably make it, and that clients are informed of the mitigating actions that you have taken to make the environment secure, and what will be required of them in attending sessions. You may wish to review this again and for example determine that masks should be worn in communal areas (halls, toilets, etc.), irrespective of what the decision for individual clients will be about whether they are worn during the counselling session.
- If you are or your clients are exempt from wearing a face covering/mask, or where the use of face coverings/masks is going to give rise to distress or will hamper the therapeutic process, you may wish to consider whether a Perspex screen is feasible in the space that you have (there are a number of different options available on-line from pop up floor standing screens to ones that can rest on a coffee table for example) as this helps to mitigate against the risk of droplet and aerosol transmission. Please note that this is a suggestion only.

### 3. The client/counsellor agreement

- Assuming that you have not set as a condition for your clients and yourself that all parties must wear a face covering, discuss with each client the government's recommendation (remembering that they slightly differ in the devolved administrations), establishing whether you or they qualify for an exemption, and how they feel about the use of face coverings in their therapy sessions with you.
- For children you will obviously need to discuss the situation with their parent/s or guardian, considering whether they are at an age where they are exempt and whether your use of a face covering/mask will have a detrimental impact on the child.
- From this discussion you can make **an ethical decision** as to how you wish to proceed when meeting this client in a counselling session. If the decision is to not wear face coverings or masks this means that you are **making a professional judgment that refraining from doing so is in the best interest of your client.**
- Depending on whether you have a Perspex barrier or not, you may then need to have a discussion about that will be acceptable to the client, or whether the use of this type of barrier will also have an unacceptably detrimental impact on the client.
- If you decide that you and your clients will not always be wearing face coverings/masks, you will need to ensure that all of your prospective face to face clients are made aware of this possibility, as this may influence their decision about wearing a mask and having in person sessions.
- You should then make a note of your agreement, ensuring that you have the clients (or their parents/guardians) explicit consent to what has been agreed.

#### For Affiliates

There is a decision tool to work through to help business open safely:

<https://www.gov.uk/coronavirus-business-reopening> & this is a result for a business employing 4 or more people [https://www.gov.uk/coronavirus-business-reopening/y/offices/over\\_4/yes/yes/to\\_work/no](https://www.gov.uk/coronavirus-business-reopening/y/offices/over_4/yes/yes/to_work/no)

There is different advice for training and educational settings

<https://www.gov.uk/government/publications/safe-working-in-education-childcare-and-childrens-social-care/safe-working-in-education-childcare-and-childrens-social-care-settings-including-the-use-of-personal-protective-equipment-ppe>

For the purpose of considering opening safely, volunteers need to be treated as though they were employees and you have the same duty of care in regard to their safety.

## **Decision Tree & Digest (attached)**

The wearing of face masks needs to be considered within a wider context of practice during the time of COVID-19. Our advice remains that where possible the safest option with regard to virus transmission is that members work with clients remotely by telephone or video link, or where this is not possible, consider the options for meeting outside e.g. walk and talk. However, in addition to seasonal concerns (we will soon be in autumn) we recognise that our members may need to resume face to face sessions when acting in the best interests of clients for whom remote sessions or outdoor sessions are not possible or not therapeutic. We are aware that many people are suffering as a result of the impacts COVID-19 in their mental health and wellbeing and some will be in acute need of in person therapy.

We have produced a digest of the advice we have published over the COVID-19 period on returning to work, which is on our website in various emails, etc. We have also included with this email a decision tree, which sets out the key steps you need to take when returning to in person counselling, including decisions about the use of face masks. Please note there are three pages with considerations about face coverings/masks on the final page.

## **Self-Employment Grant**

The government has made available a second and final payment for the self-employed who have suffered a loss of income or increase in costs due to the pandemic. This is a taxable payment and you need to keep evidence in support of you claiming it.

<https://www.gov.uk/guidance/claim-a-grant-through-the-self-employment-income-support-scheme>

It remains to wish you all well, trusting that with the support of ACC, your supervisors and colleagues you will make good decisions in these challenging and changing times.

If anyone has any questions or concerns, please contact us through [office@acc-uk.org](mailto:office@acc-uk.org)

Best Wishes

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