

21 September 2020

HBA D6 Aesthetics statement regarding temporary adaptations and flexibilities to regulated qualifications due to COVID19.

Purpose

The coronavirus (COVID-19) pandemic has resulted in restrictions to aesthetics (non-surgical cosmetic education and training during 2020). Guidance has been provided by the Government on close contact services, inclusive of aesthetics with variable opening dates for businesses. As a result, some services and treatments were delayed and not legally permissible. It is also possible that the public health restrictions may continue or be re-introduced either locally or nationally during the rest of the year. Learners, employers, and training providers wish to continue as soon as possible to learn and to continue to provide their training/qualifications, clarity is urgently required therefore to enable Awarding Organisations to plan effectively. In this paper we will set out the recommendations we are proposing to ensure a consistent approach to the continuation and delivery of aesthetics qualifications (clinical and non-clinical) / non-surgical cosmetic treatments).

Aim

The aim is to provide consistent approach to support awarding organisations delivering qualifications in the hair, beauty, and aesthetics sector. It is provided in relation to implementing temporary adaptations for the ERF in aesthetic qualifications in 20/21 due to COVID19.

The Impact of COVID 19

The Covid19 pandemic has had a dramatic impact and effect on the sector and will continue to do so when we are able to return to more normative working practices, which demand the adoption and implementation of new ways of working. Maintaining safe working practices, professionalism, competency and standards within the sector is a key determiner to the sector returning to a 'new normal' and assuring public confidence.

Impact of Proposed Changes to Competency Levels

It is important that any adaptations or flexibilities to qualifications, maintain the rigour and validity required and do not devalue the qualifications, leading to confusion over levels of competence and nationally transferrable standards of proficiency.

We believe that the following principles should continue to be applied when considering any adaptations, they:

1. must ensure that learners are competent and safe to practise, meeting health, safety, public protection and legal requirements
2. must meet Covid safe risk assessment guidance as detailed in the relevant Government guidelines and local enforcement notifications
3. must support the standards set by employers, standard setting authorities, and individual industries
4. will neither advantage or disadvantage learners historically, now or in the future
5. must maintain the validity, reliability, and integrity of standards and qualifications
6. must cover all the knowledge, skills, and competencies
7. must consider learners attendance and duration of learning completed, addressing any gaps in learning.

This statement is subject to review based on Government guidance.

All stakeholders have a duty of care to every learner and ultimately the client/customer. The achievement of a qualification is confirmation of competence that a learner has achieved the learning outcomes and competence to work in the sector, endorsed by the issued learner's certificate as evidence of the learner's fitness to practice.

Wherever possible the full qualification must be completed as detailed in the qualification specification. Adaptions and flexibilities have been agreed if a service or treatment cannot be completed due to Government restrictions or if [Government guidelines](#) preclude the full qualification being completed (due to social distancing or limited space restrictions).

Definitions

An adaption is a permitted change of regulated qualifications in line with the Extraordinary, Regulated Framework (ERF) and Extended Extraordinary Regulated Framework (ERF)

A flexibility is the ability to change or something to be changed easily within the qualification according to the situation

The following treatments and services qualifications are included within the aesthetic suite of qualifications:

- Advanced skin studies
- Skin Science
- Microneedling
- Dermarolling
- Dermaplaning
- Microblading
- Micropigmentation and Semi permanent make-up
- Skin rejuvenation
- Electrocautery / Skin blemish removal
- LED
- Laser and IPL
- Chemical peel
- Aesthetics (clinical and non-clinical) / non-surgical cosmetic treatments)

The below advanced beauty therapy practices at level 4 and above are not included in this document, however they are included in the Beauty statement regarding temporary flexibilities and adaptions to regulated qualifications due to COVID19 (HBA D5).

- Holistic, complementary and alternative therapies, reflexology, crystal therapy, aromatherapy
- Salon Management

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2020-2021 Regulated qualifications adaptations and flexibilities post 24 March 2020

The following THREE scenarios have been developed to consider Government restrictions and potential local lockdowns:

Scenario 1: Government guidelines state that close contact services are not permitted:

- No skills/practical training or skills/practical assessment can be completed (reschedule as soon as possible)

Scenario 2: Government guidelines state that close contact services on the face are not permitted:

- No skills/practical training or skills/practical assessment can be completed for services on the face in the high-risk zone:
 - Electrocautery/skin blemish removal microneedling, dermarolling, dermaplaning, microblading, micropigmentation, skin rejuvenation: LED, laser, IPL, chemical peel, and aesthetic (non-surgical cosmetic) procedures

Scenario 3: Government state that close contact services on the face are permitted in line with Government guidelines (mitigations)

It is highly recommended that training providers concentrate on training and assessment on the face, when services are permitted to open, in case further restriction or local lockdowns are in place

Level 4 and 5 specific adaptations for scenario 2 and 3

Knowledge and Understanding:

The learner must demonstrate 100% achievement of the knowledge detailed within the qualification specification

The recommended approach including the knowledge statements usually assessed by externally set mandatory testing (closed book) or knowledge assignments is as follows, this should be conducted virtually and recorded with appropriate consent:

- Knowledge statements assessed by externally set mandatory question papers where it creates an unnecessary risk to invigilate under formal assessment conditions ('closed book'); the knowledge should be evidenced and referenced to other forms of knowledge evidence achieved to include:
 - evidence cross referenced from another unit already achieved as a mandatory question under formal assessment conditions (closed book)
 - assignment/project/ case study evidence cross referenced to the knowledge statements
 - written questions
- Where possible knowledge should be inferred and synthesised from practical observation and evidenced
- Where knowledge cannot be inferred, oral /questions and answers and professional discussion should be used to generate evidence against the remaining criteria

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- Assessment of knowledge, oral questions and answers and professional discussion sessions must be carried out by an assessor who is occupationally competent and in a way that authenticates the responses are the learners own
- All evidence gathered should be traceable, auditable, and authenticated.

Performance Criteria:

- The training provider must confirm and agree the specific venue requirements that must be in place to include ensuring a realistic working environment:
 - The real work environment must meet the following principles:
 - All practical skills observation assessments must be carried out under realistic commercial conditions, meeting the current close contact services [Government guidelines](#)
 - The range of services, professional products, tools, materials, and equipment must be current and available for use and adhere to current close contact services [Government guidelines](#)
 - All byelaws, legislation or local authority requirements including risk assessments that have been set down in relation to the type of work that is being carried out must be taken full account of
 - all relevant large items of equipment e.g. therapist’s chair, treatment couches including relevant mitigations for close contact services (e.g. visor, guards and/or screen) and PPE must be provided as outlined in [Government guidelines](#)
 - All products, tools and equipment must available, be in good working order and legally compliant.
- There is no requirement to work on a set number of “clients”. The clients can be from the learner’s workplace, educational or household bubble.
- Up to 20% additional discretionary time (in addition to the existing discretionary 10%) can be allowed for an learner to implement additional PPE, screens/guards and social distancing requirements following [Government and industry guidelines](#) and [FAQ’s](#).
- Where traditional, physical onsite practical skills observations are undertaken by the assessor:
 - Start times may be staggered for multiple practical skills observations
 - The number of learners completing practical skills observations may be reduced to reflect and meet social distancing guidelines as per [Government guidelines](#)
- Learners should be provided the opportunity to be observed virtually for any practical skills observation assessment following external quality assurance guidelines:
 - A vocationally competent employer or a vocationally competent senior member of staff must be present during the practical skills observation, for safety and to assist the assessor, on areas of clarification or where the assessor needs to see a close-up image
 - Virtual observations can only be completed on a one to one basis
 - 100% of the practical skills observation assessment must be observed by the assessor, should be live streamed, wherever possible and should be recorded with the relevant data authorities confirmed by all participants. However, where this is not possible, (remote geographical locations or insufficient live streaming access) allowances should be made to accept recorded practical skills observation evidence for assessment. Oral questions can be asked by the assessor to confirm any points of clarification, evidenced and retained. Protocols must be created and implemented to ensure all evidence gathered is traceable, auditable, and authenticated. Full observance of learner and consumer confidentiality must be complied with.

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- Practical skills observation assessments can be adapted to meet [Government guidelines](#), limiting close proximity timescales associated with providing treatments or services to increased numbers of ‘clients or customers’, examples to consider:
 - evidence collection could be cross referenced from another unit already achieved to cover a range
 - clustering the performance of multiple treatments and services on individual ‘clients or customers’ to maximise the evidence opportunities

The use of artificial mannequins or other trainers is not a permitted simulation for practical skills observation assessments.

Level 7 specific adaptations

- There are no permitted adaptations at level 7

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