



Jeanne Freeman MSP,
Cabinet Secretary for Health and Sport
The Scottish Government
St. Andrew's House
Regent Road
Edinburgh
EH1 3DG

5 / 11 / 20

Sent by email

Dear Cabinet Secretary,

Definition of Aerosol Generating Procedures

The newly formed AGP Alliance, which brings together Royal Colleges, trade unions and professional bodies from across the health and care sector, calls for an urgent review of the definition of Aerosol Generating Procedures (AGPs) involving the upper airways and gastrointestinal tract for the purposes of Personal Protective Equipment (PPE).

We strongly believe that current government guidance does not reflect the best available evidence on AGP and leaves health and care professionals, their patients and colleagues at increased risk of COVID-19 transmission. Unequal access to adequate PPE by health professionals across Scotland and consequently patients are getting unequal access to assessment and treatment for eating, drinking and swallowing difficulties.

Currently, a range of procedures, including the fitting of naso-gastric tubes and retention devices for drainage or feeding, assessment of safe swallowing, chest physiotherapy, cardiopulmonary resuscitation and associated procedures linked to advanced airway management particularly in the out of hospital environment, and gastrointestinal physiology investigations amongst others, are wrongly excluded from the list of AGPs in government guidance. This is despite the fact that they require close physical contact with patients (within one metre) for prolonged periods of time and induce coughing and sneezing. As a consequence, health services are not required to provide staff undertaking these procedures with AGP level PPE including disposable fluid repellent gowns, filtering face piece class 3 (FFP3) respirators and face shields.

There is substantial evidence that as part of these procedures, coughing and sneezing generate aerosols with significant viral load, creating a higher risk of transmission of COVID-19, which itself causes profuse coughing.

The current guidance from Government (Health Protection Scotland, PHE, NERVTAG) makes much of the distinction between droplet and aerosol generation as determinants of PPE level, but instead uses poor quality transmission studies to determine AGP status. It also ignores the huge weight of professional experience and expert opinion from during the COVID-19 pandemic that such procedures significantly increase transmission risk. A number of our members have already been forced to issue independent guidance to their members that contradicts Government advice and defines these procedures as AGP.

We have repeatedly asked Scottish Government and Health Protection Scotland officials to review this guidance and explain how and by whom decisions on AGP have been made. We have received an insufficient response and have been unable to challenge the evidence behind the decision with the scientists or civil servants responsible. The most recent review of AGP guidance, updated 16 September 2020, indicates that no new evidence has been considered, despite the wealth of evidence submitted by our members.

As we head into the autumn and winter months, the health and care professionals we represent are gearing up to respond to the second wave of COVID-19 cases. It is vitally important that they are able to do so as safely as possible – and that patients have equal access to all necessary assessment and treatment.

We would ask you to personally intervene to instigate an urgent review of AGP and provide transparency on how such guidance is determined. At the very least, the precautionary principle should be used and all healthcare professionals provided with appropriate PPE where there is any reasonable chance that a procedure is aerosol generating.

There is more detail in the enclosed position statement and we would be happy to brief a member of your team further if this is helpful.

Yours sincerely,



Dr Barry Jones BSc, MBBS, MD, FRCP
Chair, AGP Alliance

British Association for Parenteral and Enteral Nutrition

Dr Trevor Smith
President

British Association of Stroke Physicians

Professor Rustam Al-Shahi Salman
President

British Dietetic Association

Andy Burnham
Chief Executive

British Society of Gastroenterology

Professor Ramesh Arasaradnam
Executive Officer

Chartered Society of Physiotherapy

Natalie Beswetherick OBE MCSP MBA FCSP
Director of Practice & Development

College of Paramedics

Tracy Nicholls
Chief Executive
Professor Julia Williams
Head of Research and Development

Hospital Consultants and Specialists Association

Dr Claudia Paoloni
President

National Nurses Nutrition Group

Claire Campbell RGN
Chair

Royal College of Speech and Language Therapists

Kamini Gadhok MBE

Chief Executive

Unison

Unite the Union

Steve Thompson

Unite Executive Council member for the health sector

Frances Ridgway

Chair, SLT Organising Professional Committee

cc:

Dr. Gregor Smith, Chief Medical Officer

Carolyn MacDonald, Chief Allied Health Professions Officer

Professor Mahmood, Health Protection Scotland

Please reply to:

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Enc.