

Jamie Hepburn MSP

Minister for Business, Fair Work and Skills

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Dear Minister

As the four leading organisations representing the hair, beauty and wellness sector, we are writing to you to urge the following:

1. For clients to be permitted to remove face masks temporarily for the purposes of treatments to the face in line with the rest of the UK;
2. For a level playing field in regards to practitioners operating on medical/health premises;
3. For a clear timeline outlining when restrictions to operations within the sector are likely to be relaxed and/or removed allowing businesses completely unable to operate (e.g. make-up artists) or having to offer a hugely reduced service, to fully reopen.

Impact of COVID-19 on the hair, beauty and wellness sector

The latest industry data for Scotland prior to the lockdown at the end of 2020 painted a bleak picture of the industry¹, with their present situation likely to be worse following three further months of closure:

- 1 in 4 (28 per cent) were not earning enough to cover outgoings such as rent, overheads, staff costs and stock etc. 37 per cent were just about breaking even. Less than a third of beauty businesses in Scotland were making any kind of profit.
- 41 per cent of the sector operate either a solely beauty or a dual service business and were impacted by the restriction to facial treatments due to mandatory wearing of face masks.
- 1 in 9 business owners had already made redundancies as a result of the pandemic, with 1 in 6 certain that further redundancies would be likely. More than half had cut staff hours in order to save costs.

It also should be noted that as a predominantly a female owned (82 per cent) and a female employed industry (89 per cent) operating flexible working to support those with care responsibilities – this demographic continues to be most heavily affected by the pandemic².

Debt in the sector

Despite support from government, many businesses are still struggling due to the limitations on treatments and services in Scotland. The number of businesses with no cash reserves has more than doubled to 61 per cent. At the end of 2019, a quarter of businesses had some form of debt – by the end of 2020 it was two thirds³.

This is largely attributed to the support grants for closed businesses being inadequate in terms of covering the fixed monthly operational costs of running a business, separate to staff costs that continue regardless of whether the business is operational or not. The limit on earnings due to restrictions has meant that even when able to open, a quarter of businesses in Scotland have continued to accrue debt.

A level playing field

The existing exemptions on the removal of face coverings create a loophole currently being exploited by medical practices. At present, Health Improvement Scotland (HIS) premises are permitted within the current regulations to carry out non-medical treatments. The regulations also do not require that such treatments must be conducted by medically qualified or healthcare staff. This has resulted in beauty therapists conducting non-essential treatments and procedures such as facials, hydra facials, laser treatments, even in cases where the HIS registered professional is not present, with clients permitted to remove their mask for treatments in these settings.

¹ NHBF State of Trade Survey November 2020

² [‘Carrying the work burden of the COVID-19 pandemic’](#) University of Nottingham and the University of Warwick Oct 2020

³ [‘Hair, beauty and the pandemic: An industry at the sharp end’](#) Pragmatix Advisory February 2021

This is grossly discriminatory to beauty salons and practitioners who are not permitted to carry out the same treatments. We accept that medical professionals should be able to perform urgent or essential medical treatments. We do not however think that it is acceptable that premises deemed to be medical or health sites can offer non-essential or non-urgent treatments by any practitioner, medically qualified or otherwise unless the same can be offered in non-medical settings.

Parity with the rest of the UK

England, Wales and Northern Ireland have allowed the removal of masks during treatments and services which has not resulted in increased levels of cases in comparison to Scotland. In Wales, therapists performing treatments to the face must wear an FRSM grade face mask for the duration of these treatments, with the client removing their mask momentarily to allow the treatment to be performed. We would ask that the Scottish Government consider similar measures in the reassessment of their guidance.

By failing to address this issue, the Scottish Government risks border crossing issues, with Scottish residents moving across the border to England to have facial treatments. Not only does this present an increased risk by encouraging travel at a time when it is recommended to 'stay local', but it also results in a loss of income coming into Scotland, and more businesses in Scotland potentially losing clients once fully operational to salons that were open earlier.

The need for a timeline

As this letter has outlined, businesses within the hair, beauty and wellness sector are on the brink. Some businesses have now reached the milestone of a year of closure. Whilst the First Minister has outlined her initial plans to reopen and the order by which sectors may be permitted to begin operating, all the while the mask requirement exists, make-up artists, facialists etc. are completely unable to operate with no indication of when this might change. This is simply unacceptable.

For those in the sector that offer multiple services, the restriction in services they can offer due to the mask requirement is a further blow in addition to the other measures that are already limiting businesses to being able to operate at 30 per cent reduced capacity and the average two hours per day per member of staff lost in client appointment opportunities by having to implement the additional guidance requirements.

We would therefore implore you to allow the removal of masks if required for the purposes of hair, beauty or wellness services, maintaining the other mitigations within the close contact guidance. If this is not possible businesses must be given a clear timeline from which they can prepare to reopen and offer services to the face.

Conclusion

The hair, beauty and wellness sector needs the support of the Scottish Government and an understanding of the significant impact the face covering requirement has on their businesses ability to generate income. As a sector demonstrating 54 per cent growth in the five years prior to the pandemic and three of the top retail categories showing most growth in the first half of 2020 it is evident that with support, the personal care sector can return to the profitable position it was previously.

With ten percent of the sector already lost to the COVID crisis as of December 2020⁴, the Scottish Government can prevent any further businesses in Scotland from having to close their doors permanently by addressing the issues highlighted above and showing their confidence in the hygiene and safety of the hair, beauty and wellness sector.

Yours sincerely



Victoria Brownlie
On behalf of the National Hair and Beauty Federation



Millie Kendall MBE
On behalf of British Beauty Council



Helena Grzesk
On behalf of British Beauty Council
& UK Spa Association



Lesley Blair
On behalf of British Association of Beauty Therapy &
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⁴ Local Data Company December 2020