

Fish Pedicures – Code of Practice 15

Special Treatment Premises

1.0 Purpose

The purpose of this Code of Practice (COP) is to support the policy decisions and conditions of licence adopted by the Council in respect of Special Treatments Establishments.

2.0 Scope

This COP details specific requirements for fish pedicure treatments in addition to those laid down in the Regulations prescribing standard conditions applicable to all special treatment premises.

3.0 Definitions

3.1 Fish Pedicure Treatment

For the purpose of this COP a fish spa is taken to be any premises offering fish pedicures. A fish pedicure is the process in which the user places their feet in a tank of water (which may be for individual use or shared) to mid-calf level and *Garra rufa* fish preferentially ‘nibble’ the thickened skin from the feet, usually for between 15 to 30 minutes.

Recommendations

4.0 Premises and facilities

4.1 Spa owners should have a “suitable and sufficient” risk assessment in place (such as that described in HSE document *Five steps to risk assessment*), which includes infection control issues. Whilst the requirement to record the risk assessment specifically applies to premises with five or more employees, keeping a written record would be useful for all premises.

4.2 Spas should have a procedures document which records company policy for use, cleaning and maintenance of the fish spa, and associated staff training procedures.

4.3 General standards of hygiene and infection control as required for beauty salons should be followed as a minimum standard. Towels used to examine or dry feet should be white, and washed at 60°C.

4.4 Wash basins with running water should be provided so that parts of the body (hands or feet) which are to be treated can first be washed with soap and water, then rinsed and dried. Where the provision of mains-fed washing facilities is impractical, mobile washing stations with running water are a suitable alternative. A supply of non-running water, cold water alone, or the use of wipes or sprays are not acceptable.

4.5 Floors and other surfaces near the pedicure tanks should have suitable slip-resistant coverings that are non-absorbent and readily cleanable. They should be regularly cleaned throughout the day to prevent transfer of contamination while walking barefoot.

4.6 An incident log should be maintained which details adverse events such as bleeding detected (i.e. on client, in tank, on surfaces), or fish showing signs of ill health, and any actions subsequently taken.

5.0 Client Interactions - Preparation for treatment

5.1 Clients should be provided with information about fish pedicures including contraindications prior to treatment. This should include advice on medical conditions that may increase the risk of infection, or pose an infection risk to other clients. These may include, without limitation:

- Leg waxing or shaving in last 24 hours (micro-abrasions increase infection risk).

- Any open cuts/wounds/abrasions/broken skin on the feet or lower legs.
- Infection on the feet (including athlete's foot, verruca).
- Psoriasis, eczema or dermatitis affecting the feet or lower legs.
- Diabetes (increased risk of infection).
- Infection with a blood-borne virus such as hepatitis B, hepatitis C or HIV.
- Any immune deficiency due to illness or medication.
- Bleeding disorders or on anticoagulant medication (e.g. heparin or warfarin).

5.2 Clients should be asked to sign a form (similar to that used prior to other salon treatments) to confirm they have read and understood the information given, and are not aware of any contraindications to treatment. If any client is unsure about answers to any of the questions, they should seek advice from their GP before having the procedure.

5.3 Pre-immersion foot examination: specific training on how to inspect feet should be provided by a suitably trained individual. This could be a podiatrist or a beauty therapist with a nationally recognised qualification in pedicure. Staff should document that a foot inspection has been carried out.

5.4 As a minimum, staff should be competent to: confirm skin integrity, detect any signs of fungal infection between the toes or of nails, or any lesions, ulcers, verrucas, or poor circulation (discolouring). As with all training, this should be documented. Staff should wear single-use, non-latex gloves to perform foot inspections.

5.5 Clients should remove jewellery, false nails and nail polish that may mask signs of infection.

5.6 Washing feet with soap and water is necessary before the treatment partly to remove any lotions or chemicals present on the skin which could be toxic to the fish, but also as good practice to minimise shedding of micro-organisms into the water.²⁷ This should be followed by thorough rinsing to remove any traces of soap.

6.0 Following treatment

6.1 Post-immersion foot inspection: staff should perform foot inspection to look for evidence of bleeding. Staff should wear single-use, non-latex gloves, and use a fresh white towel to dry the feet so as to aid visualisation of low level bleeding

6.2 Hands should always be washed after contact with the water to prevent inadvertent hand to mouth transmission of any possible gastrointestinal pathogens present.

7.0 Actions in the event of bleeding

7.1 If, following treatment, there is visual evidence of blood in the tank or a client has evidence of bleeding, the fish should be removed to a holding tank while the spa tank is cleaned and refilled. Fish present in a tank where bleeding has occurred must remain in the holding tank for a minimum of 48 hours. They may then be re-used

7.2 The following approach should be used for cleaning the tank if a bleed has occurred.

These steps will remove most of the organic matter that would inactivate the hypochlorite, and ensure effective disinfection:

- 1) drain the tank;
- 2) clean with detergent and warm water;
- 3) rinse thoroughly;
- 4) treat with hypochlorite made up freshly at a concentration of 1,000 parts per million available chlorine (use hypochlorite in tablet form and follow manufacturer's instructions);
- 5) rinse very thoroughly.

Because residual chlorine will adversely affect fish, standardised test strips for measuring chlorine may be useful to confirm adequate rinsing.

7.3 Suitable Personal Protective Equipment including gloves, apron and plastic safety spectacles to avoid eye splash (refer to the cleaning products safety data sheet), must be worn by the operator while carrying out the above procedures.

7.4 If bleeding has occurred, any visible blood on surfaces where other clients could walk barefoot should be cleaned and then the area disinfected with hypochlorite solution at 10,000 parts per million available chlorine. This must be left in contact for 10 minutes and then rinsed off.

8.0 Equipment and maintenance

8.1 Specialist advice should be sought on the equipment and conditions required to achieve and maintain suitable conditions for fish health (see Appendix 1 and OATA Code of Conduct³⁵).

8.2 Tanks and other equipment including filters should be cleaned and maintained according to supplier or manufacturer's advice. This process should be documented in the risk assessment (see section 7.1).

8.3 Cleaning should be undertaken in such a way as to minimise splashes, droplets or aerosol generation.

8.4 Direct visual inspection of water quality should ensure that water is clear and odourless, and any particles or debris visible in the tanks after use should be removed.

8.5 Water should be changed according to manufacturers' instructions, or as frequently as tolerated by the fish. This will depend on the tank volume, types of filter, stocking density and behavioural stressors. Further advice should be sought (Appendix 1). Water quality monitoring should comply with the OATA water quality criteria.

8.6 Staff should receive appropriate training in the basic care and welfare of fish.

8.7 Advice must be sought on the safe and legal disposal of unwanted, sick or dead fish (from the local authority in the first instance).

9.0 Monitoring for adverse events

9.1 Clients should be informed of the potential risks and encouraged to report any ill effects to their GP or the local Health Protection Unit. Complaints should be made to the local Environmental Health department

9.2 GPs and other clinicians, microbiologists, public health practitioners, chiropodists and beauty therapists should be made aware of the potential risks from fish spas, and to consider this exposure in patients presenting with foot or other unusual infections. Any such cases seen should be reported to the local Health Protection Unit.

10.0 Qualifications

10.1 Pedicure

Therapists must hold a National Occupational Standards (NOS) qualification for pedicure. The following qualifications will be considered as meeting the qualification requirement:

- a.) NVQ level 2 or 3 (pedicure)
- b) BTEC National Diploma – Beauty Therapy
- c.) ITEC Certificate in Pedicure
- d.) VTCT Level 2 in Pedicure
- e.) CIBTAC Nail Treatments Diploma or Aesthetics Treatments Diploma

Therapists and nail technicians offering pedicure who hold qualifications not listed above or obtained abroad will need either to undertake a suitable course as listed above or apply for UK comparison through an organisation such as UK NARIC.

10.2 Accredited Acquired Prior Learning Centres

Experienced therapists offering pedicure treatments may be able to obtain a suitable qualification through a process of assessing acquired prior learning at NVQ and VTCT approved and accredited training centres. Practical skills, knowledge of health & safety legislation, anatomy & physiology, contra-indications, infection control & hygiene will be assessed and a course of study set to improve knowledge in areas where you fail to meet the NVQ and VTCT standard for that qualification.

11.0 Review

This Code of Practice will be reviewed regularly and updated in light of current industry guidance and legal opinion. Any changes will be notified to licensees and will be attached as conditions to your licence with effect from the date of the next renewal of your licence.

12.0 Appendix 1. Sources of information and advice

Fish welfare

Local veterinary practice

Fish Veterinary Society: www.fishvetsociety.org.uk (This is a general website, but members can be contacted for specialist advice on aspects of fish welfare.)

Ornamental Aquatic Trade Association (OATA): www.ornamentalfish.org

□ Code of Conduct (2008), available at

<http://www.ornamentalfish.org/association/code/Code.pdf>

□ Water Quality Criteria (2008), available at

<http://www.ornamentalfish.org/association/code/Water%20Quality%20Final.pdf>

“Your Legal Duty Of Care For Keeping Fish Under The Animal Welfare Act” 2008.

Available from the Federation of British Aquatic Societies website at

<http://www.fbas.co.uk/FISH%20CARE%20and%20LAW.pdf>

British Veterinary Association: www.bva.co.uk/default.aspx

Royal Society for the Prevention of Cruelty to Animals (RSPCA): www.rspca.org.uk

Local authority (for advice in the first instance on disposal of sick or dead fish under the Animal By-Products Regulations)

The Centre for Environment, Fisheries and Aquaculture Science (CEFAS)

www.cefas.defra.gov.uk

Spa management

Advice may be sought from Habia, the government-appointed, standards-setting body that provides guidance on legislation and salon safety for beauty therapists.

www.habia.org and the:

Health Protection Agency

2nd Floor

151 Buckingham Palace Road

London

SW1W 9SZ

www.hpa.org.uk