

Food Standards Scotland response to COVID-19 - Update

1 Purpose of the paper

- 1.1 The purpose of this paper is to provide the Board with an update on Food Standards Scotland's (FSS) ongoing response to the COVID-19 pandemic and to seek views on measures taken and proposed.
- 1.2 The paper provides an update of our continued response to the handling of COVID-19 since June 2020. This includes continuous support for our staff in protecting themselves and others. It is also important to provide the Board with assurance on our sustained capability and capacity and it has also been important to ensure there is a continued record of the actions taken by the Executive throughout the COVID-19 crisis.
- 1.3 This paper provides an update on the FSS response to the COVID-19 paper presented to the Board on 10 June 2020 and covers:
 - (i) our approach to protecting our staff in order to maintain the delivery of Official Controls (OCs) in approved meat establishments by implementing strict physical distancing
 - (ii) progress on the guidance for food business operators and their employees to support food businesses in identifying and implementing the measures needed to prevent the spread of COVID-19 across their operations
 - (iii) our continued efforts to ensure food and feed remains safe and how we have worked with stakeholders to achieve this
 - (iv) progress with recovery planning process.
- 1.4 The Board is asked to:
 - **Note, discuss and provide a view** on the progress to manage the COVID-19 pandemic.

2 Introduction

- 2.1 As the Board is aware the on-going response to COVID-19 has presented continuous challenges and uncertainty which have a sustained impact on staff across the organisation who have had to reprioritise their workloads and adapt to new ways of working as individuals, with colleagues and stakeholders alike. The pressures are also now being exacerbated by the increasing and simultaneous requirement to prepare for Brexit at the same time as managing COVID.

3 Strategic Response

- 3.1 Since COVID-19, the Executive has continued to meet with the FSS Chair and Deputy Chair weekly to update on organisational activity relating to COVID-19, business as usual and the FSS recovery planning process. The current

assumption is that the FSS Board and ARC meetings will continue to be conducted virtually until 2021.

4 Organisational Response

- 4.1 Since March 2020, our recovery planning efforts have been focussed on supporting continued home working for our office based staff and ensuring that our field based staff are supported and safe in their workplaces.
- 4.2 While we recognise that communications are of key importance, a decision was taken in August, based entirely on staff feedback, to reduce the frequency of the weekly 'All Staff' virtual sessions to fortnightly. These meetings include updates from the senior management, progress on recovery planning and branch updates. Directorates and Branches are conducting their usual team meetings and line managers have individual monthly meetings with staff.
- 4.3 Throughout the period, information on staff welfare services has been communicated and promoted. Following the Scottish Government (SG) announcement of 11 September outlining that working from home is the default, we communicated to staff that we do not intend to re-open Pilgrim House this calendar year. To support sustained home working, SG issued a wellbeing pack for line managers and staff which we adapted for FSS purposes and issued to staff. A key factor of this wellbeing guidance is to ensure that line managers hold 1 to 1 wellbeing discussions with all their staff before the end of October.
- 4.4 Since June, in line with the SG Route Map, in preparation for moving into Phase 4 and the recent SG announcement, the Strategic and Operational recovery planning groups have considered all aspects of ensuring that there will be a safe return to Pilgrim House. The work undertaken includes: staff and building risk assessments developed with guidance issued by the Department of Business, Energy and Industrial Strategy, the Health and Safety Executive and NHS inform and is in line the SG's approach; a comprehensive recovery plan with a supporting office protocol document incorporating all elements for line managers and staff on how to manage in COVID-19 safe office environment.
- 4.5 To ensure that we can operate safely in Pilgrim House, we have employed the services of an office design company, to develop a floor plan design to allow for 2 metre physical distancing guidelines to facilitate a return to the office. This plan highlights that we will be required to operate at a reduced maximum occupancy of between 20% and 25%. We have also engaged with our landlord and cleaning contractor to provide assurance that they are operating their services within COVID-19 safe guidelines.
- 4.6 Over the next few months, a consultation is planned to seek staff views on the re-occupation and proposed shift pattern options for Pilgrim House. The purpose is that staff views drive how we use the revised occupancy level.
- 4.7 The Senior Management Team (SMT) has continued to have fortnightly meetings with the Trade Unions (TU) to update on the impacts of COVID-19 on

the organisation and our staff. The TUs are also engaged in the recovery planning process and have been given the opportunity to review all documentation prepared for a safe return to Pilgrim House.

- 4.8 Throughout, lessons learned were captured and encapsulated for SMT to review. SMT will assign outstanding actions and agree the longer-term governance of this process. This will support our ability to secure long-term recovery from the incident and enhance our incident preparedness capability.
- 4.9 The final Strategic Recovery Planning Group (SRPG) meeting took place on 16th September 2020 on the basis that the work needed to return back to business as usual, rather than managing on a business continuity/incident basis. Following this, CLG formed a CLG COVID-19 Workgroup to collaborate on arising issues and to support winter planning preparations. However, governance will be maintained through the SMT structure.

5 FSS Guidance

- 5.1 The FSS guidance for Food Business Operators (FBOs) and their employees aims to help food businesses in identifying and implementing the measures needed to prevent the spread of COVID-19 across their operations. It has continued to be updated, since it was first published in April 2020, to reflect changes to the SG route map. Throughout the pandemic, we have continued to engage with Scotland Food and Drink and the Scottish Food and Drink Federation during the development of the guidance and through the Food Sector Resilience Group. In addition, on-going dialogue with the FSA, Institute of Food Science and Technology and the Chilled Food Association has assisted in producing guidance that is workable and relevant to the food setting.
- 5.2 We have worked with SG Safer Workplaces team on the development of sector advice cards for food businesses. These have been produced with the aim of presenting the information covered by our guidance in a summarised form which can be shared across the workforce, and also to provide an overview of what actions businesses may be required to take when an outbreak or cluster of cases is identified in the workplace.
- 5.3 Currently, we are developing posters to be translated into multiple languages so that key COVID-19 messages can be distributed and understood by all workers in food production settings.

6 Field Operations - Delivery of Official Controls

- 6.1 Throughout challenging times, our Field Operations have maintained service to the meat industry. Since the outset, we have taken steps to protect our staff in order to maintain an effective regulatory workforce in meat plants whilst keeping food supply chains moving and ensuring that industry keep food and feed safe. Despite the pandemic absence levels escalated to over 25%, we maintained service through the goodwill of staff, many of whom cancelled annual leave and worked considerable levels of overtime. The main contributor to absence was the decision to immediately exclude staff in the vulnerable or

shielding categories until early August - including providing support, advice and plant operating guidance to our staff. This included implementing a strict 2 metre physical distancing protocol in every plant where we deploy staff.

- 6.2 Regardless of the resourcing pressures, we continued to work collaboratively with industry representatives to support the meat sector to maintain safe food production and protect animal welfare. There has been continued engagement with the meat industry now reduced to weekly meetings with industry partners to assess, discuss and work to resolve issues. Our approach and on-going support has been acknowledged and welcomed by Scottish Association of Meat Wholesalers and Scottish Federation of Meat Traders Association.
- 6.3 During the summer months, the provision of service to the meat industry continued. Recently, the impact of quarantine with staff returning from overseas travel has provided resourcing challenges and this is anticipated to continue for the foreseeable future. In recent weeks, the impact of the test and protect system is having an impact with several field staff being required to self-isolate as household members.
- 6.4 We have also conducted a programme of COVID-19 assurance visits to the plants where significant numbers of FSS and FBO staff were employed. Such visits provided advice to FBOs regarding their compliance with FSS guidance.
- 6.5 Two meat plants, based in Coupar Angus and Grantown-on-Spey closed as a result of significant outbreaks and our operational staff supported Incident Management Teams to review FBO procedures against FSS guidance prior to reopening.

7 Local Authorities

- 7.1 Since the COVID-19 pandemic, we have worked closely with wider stakeholders and Local Authorities (LAs) to support FBOs.
- 7.2 Given the unprecedented nature of the pandemic and national infection control measures in place and the anticipated disruption, we have altered the requirements for LAs in relation to the application of certain elements of the Food Law Code of Practice (Scotland) 2019 (the Code), and associated Interventions Food Law Code of Practice 2019, to ensure LAs had the ability to undertake wider public health duties related to COVID-19.
- 7.3 Current changes permit:
- i) Suspension of Food Law interventions to all care facilities including hospitals, care homes, nurseries, and childminders.
 - ii) Planned programmed Interventions at all lower risk Group 2 and 3 businesses within the Food Law Rating System (FLRS), and all Crown Establishments.

iii) Low risk primary production activities - exception for dairy farms supplying raw milk for the manufacture of raw milk cheese. This includes on farm inspection to assess compliance against primary production controls.

iv) Interventions at approved establishments, and FLRS Group 1 businesses should be based on a desk top initial assessment of the Food Safety Management System and associated documentation audit followed up by physical inspection only if public health concerns are identified.

7.4 Intelligence driven Interventions at all food business establishments regardless of category are continuing. Intelligence will include information that suggests fraudulent activity or imminent risk to public health, e.g. consumer complaints, credible allegations of food poisoning, failed samples of a serious nature that suggest fraud or health risk.

7.5 We are continuing to monitor LA activity during this period on a monthly basis via the Scottish National Database.

7.6 Since 21st May 2020, efforts have been focussed on LA recovery planning. This project has will been led by FSS in partnership with a SFELC working group. The recovery plan will be subject to a short period of consultation across all 32 LAs during October but whatever decisions are taken will need to recognise the resource pressures on LAs through Test and Protect.

8 External Engagement & Communications

8.1 Our key objective during the COVID-19 pandemic has been to ensure businesses and consumers have the most up-to date, accurate, and useful information about food safety and transparency during the current crisis - helping consumers to have trust in the food that they eat.

8.2 Through both existing and temporary networks established to deal with COVID-19, we have been working closely with colleagues in SG, LAs, and OGDs to co-ordinate messaging and stakeholder engagement. There has been continued engagement with the FSA to ensure alignment, where relevant.

8.3 Throughout, we have conducted consumer tracking surveys on our food attitude and behaviour during the pandemic working closely with the FSA, and have been keeping SG updated on the findings. We are aiming to publicise the trends once we receive the results for the final wave later this autumn and this will help inform future consumer health and safety advice.

9 Next Steps

9.1 Key areas of focus going forward relate:

(i) to managing issues in Q3/Q4 of this financial year including developing organisational capacity and resilience for winter flu, further COVID outbreaks and Brexit, and the on-going possibility of a food related non routine incident;

and

(ii) finalising our preparation for re-occupancy of Pilgrim House.

10 Conclusion/Recommendations

10.1 The Board is asked to:

- **Note, discuss and provide a view** on the progress made by us to manage the COVID-19 pandemic.

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