COVID-19

Guidance for food business operators and their employees

19 July 2021
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COVID-19: 
Guidance for food business operators (FBOs) and their employees

Introduction

As Scotland moves through the COVID-19 pandemic, it is important for the food sector to continue to prioritise the safety of their staff and to ensure all employees are following government guidance on infection prevention and control measures against the virus.

There is currently no evidence that food or food packaging is a source or vehicle of transmission for the COVID-19 virus. However, in order to stop the spread of COVID-19 in the workplace, it is critical that food businesses continue to apply effective health and safety (H&S) procedures and infection prevention and control measures alongside Food Safety Management Systems (FSMSs) which include thorough hygiene practice and the application of Hazard Analysis and Critical Control Point (HACCP).

This guidance outlines ways that COVID-19 control measures can be applied in food businesses to enable the workforce to adhere to government advice for preventing the spread of COVID-19. It has been developed to support all food businesses (including manufacturing, retail, takeaway and hospitality) which are permitted to operate according to national restrictions in accordance with Scottish Government’s Strategic Framework. The Framework describes how Scotland will work to suppress the virus to the lowest possible level and keep it there, while we strive to return to a more normal life for as many people as possible.

Ventilation, physical distancing, handwashing, the cleaning of surfaces, face coverings - all of these basic measures are as important now as ever in preventing the spread of COVID-19 in food production and handling environments. Both managers and staff should ensure these measures are adhered to wherever possible in order to prevent the spread of the virus. Food businesses should refer to the Scottish Government website: Coronavirus (COVID-19): Local Protection Levels, for details on the COVID protection level that applies to their local area and the restrictions that apply.

The key mitigation measures for food businesses are to:

• ensure physical distancing is adhered to in all indoor areas throughout the workplace (1 metre)

• promote the wearing of face coverings by staff and customers where appropriate, ensuring adherence to the mandatory requirements and supporting staff in following best practice in their use

• implement good ventilation across all areas of the business

• ensure staff maintain effective personal hygiene measures at all times

• implement effective cleaning and disinfection regimes

• ensure staff self-isolate and get tested where appropriate, in accordance with Scotland’s Test and Protect Strategy
This guidance will continue to be reviewed in line with Scottish Government’s review of lockdown restrictions as well as emerging evidence and changes to public health advice. This guidance translates Health Protection Scotland’s Information and Guidance for General (Non-Healthcare) Settings for application by food businesses and complements Scottish Government’s Coronavirus (COVID-19): creating and maintaining safer workplaces guidance, over-arching sector guidance for easing lockdown and general guidance for safer workplaces. It also takes account of food industry best practice on practical ways to provide a safe working environment at this time. The Equality and Human Rights Commission (EHRC) Scotland can provide advice on a range of issues such as: non-discrimination, reasonable adjustments for disabled people and communication with employees on equality issues, support for pregnant employees or employees on maternity leave, flexible working for those with caring responsibilities, how to deal with harassment at work. EHRC have also produced guidance for public sector employers about equality impact assessments and having due regard to the Public Sector Equality Duty and Scottish Specific Duties during the pandemic.

Other considerations for FBOs which are not covered by this guidance

FBOs which are preparing to re-start their operations following long-term closure due to COVID-19 restrictions should also be aware that there is an increased risk of Legionnaire’s Disease when buildings have been out of use, or not running at full capacity. This is because water systems may become stagnant when not in use, increasing the risk of legionella within water supplies. The HSE has published advice on the risk of Legionella during the COVID-19 crisis on the Royal Environmental Health Institute of Scotland (REHIS) website. Building owners should undertake a health and safety check of buildings, and deep cleaning prior to reopening, to mitigate risks. More information on Legionella risks during the COVID-19 pandemic can be found on the HSE website.

Questionnaire for assessing the need for additional measures at FBOs to prevent the spread of COVID-19

The following questionnaire will support managers in assessing where there is a need to strengthen their existing FSMS, H&S procedures and infection prevention and controls. It should be noted that FBOs who identify any gaps or inadequacies in their current procedures should carefully consider their ability to operate safely at this time, and implement any changes where necessary.

1. Have you reviewed your existing Food Safety Management System (FSMS) and Health and Safety (H&S) procedures against Government advice on COVID-19 to identify any changes needed to implement any additional hygiene, infection prevention and control, and physical distancing measures?

2. Do you have procedures in place for ensuring all staff are aware of the need to control the spread of COVID-19 in their workplace and if so, how are these evidenced?

3. Is your business able to ensure effective hand hygiene measures through the provision of hot water, suitable soap, paper towels and hand sanitiser at every entrance to food production/service and communal areas and at appropriate points within these areas?

4. Are all of your staff adequately trained in effective hand washing technique? Will you be able to monitor this practice at all appropriate points throughout your business?
5. Have you reviewed your existing cleaning and disinfection procedures to ensure they are sufficient for controlling the potential spread of COVID-19? Are you able to implement procedures which ensure additional cleaning and disinfection is undertaken at all workstations, public/communal areas, common touch points and surfaces at an appropriate frequency?

6. Have you reviewed your capability to maintain physical distancing – **ensuring a distance of one metre between people**—across all areas of the working environment, including on-site, food production lines, customer service and communal areas? In areas where this cannot be achieved, have you implemented alternative effective solutions to achieve physical distancing such as the use of screening to separate work areas or, where appropriate, the wearing of face coverings?

7. Are you able to take measures to maintain a suitable distance between employees or segregate them whilst working on the line? E.g. by reducing line speed, introducing shift patterns, or constructing panels between workers?

8. Have you undertaken training which will ensure that all employees understand the requirements for maintaining physical distancing and are you able to put measures in place to monitor adherence by all staff?

9. Have you ensured that all staff who can work from home have been asked to do so, and have you provided them with the necessary support?

10. Have you considered measures that will be required to maintain physical distancing and hygiene across all areas where you have the responsibility for the health and safety of your workforce including any arrangements that are in place for staff accommodation and transport?

11. Have you put robust procedures in place to ensure staff do not congregate in communal areas such as canteens, arrival and entry areas, staff rooms, wash areas/hygiene stations and corridors (e.g. staggered start, finish and break times)?

12. Are you able to take appropriate measures to minimise external visitors to the premises and to ensure any essential visitors (customers, delivery drivers, maintenance crews, cleaning personnel etc.) are screened to ensure they do not present a risk of spreading COVID-19 to staff (e.g. by ensuring your visitor screening questionnaire has been updated to cover COVID-19 symptoms)?

13. Are you able to put measures in place to minimise contact between essential visitors to your site and your employees?

14. Have you expanded your employee policies and procedures to include COVID-19 considerations taking account of the following:
   - The need for managers to support employees who are considered to be at high risk of COVID-19 infection, including those with certain health conditions who have been advised to stay at home, and those who may need to be offered different roles to ensure they are not placed at increased risk;
• The need to ensure COVID-19 policies and procedures enable managers to engage appropriately with ethnic minority employees on their health status, circumstances and support needs;
• The need for managers to ensure that staff are not incentivised to work when they are feeling unwell;
• The need for staff to be aware of their responsibility to stay at home and follow government advice on self-isolation if they are unwell and they or any of their household are showing symptoms of COVID-19;
• The need for managers to monitor the health of their staff in relation to COVID-19 and are maintaining records of shift workers to support contact tracing.

15. Are you able to put measures in place to isolate and remove symptomatic individuals from the workplace and take any follow up action that may be required?

16. Do you understand your obligations with respect to Scotland’s Test and Protect Strategy? Have you taken steps to ensure all staff comply with the requirements of Test and Protect and that they are encouraged to report to their managers when they are experiencing symptoms?

17. Have you implemented procedures which will enable a potential outbreak of COVID-19 in your workforce to be identified, and do staff understand how this should be reported to Local Health Protection Teams (HPTs) and what they need to do to support investigations? FSS outbreak guidance is available to assist in this process.

18. Are you aware of the opening and operational requirements for your business in relation to the Coronavirus (COVID-19): Scotland’s Strategic Framework?

19. If you are a food retailer, are you familiar with the mandatory requirements for the wearing of face coverings by shop staff and customers? Have you ensured that all of your staff are familiar with Scottish Government guidance on face coverings?

20. If you are involved in catering and food service businesses, have you taken appropriate steps to ensure physical distancing and effective hygiene can be employed by staff and customers at appropriate points throughout your premises?

21. Within the hospitality sector, are all employees aware of the mandatory requirement for themselves and customers to wear face coverings and to collect all customer/visitor contact details as part of Scotland’s Test and Protect Strategy?

22. Are you able to provide evidence that measures for preventing the spread of COVID-19 are being implemented and monitored in addition to your existing FSMS, H&S, and Infection Prevention and Control Procedures?

23. Is your workplace risk assessment for COVID-19 available to staff and customers, and kept under regular review?

24. Have you considered contingency and risk plans for future events (e.g. if circumstances require stricter measures)?

25. Are you staying up to date with the guidance published by Scottish and UK Government including:
Other useful references are provided throughout this document

FBOs have an obligation to consult their workforce on all health and safety matters, and positive answers to these questions should provide a level of assurance to staff and Trade Unions on any concerns they have regarding the potential risk of being exposed to COVID-19 in the workplace. You may wish to review these questions with your Union representatives and H&S advisors to ensure the appropriate procedures can be applied across your business and consider how your responses could be used to support communications to staff. Further details on your legal obligations and additional advice on how to protect your employees from COVID-19 in the workplace can be obtained from the Health and Safety Executive (HSE).

When implementing measures for preventing the spread of COVID-19, it is important that FBOs continue to ensure they are managing existing H&S and food safety risks. The application of COVID-19 related measures should not be at the expense of your legal obligations to manage these risks. FBOs should therefore always consider how changes to workflow could impact on risks to the safety and well-being of staff and the effectiveness of your FSMS.

FSS has produced additional guidance and tools aimed at supporting FBOs in managing COVID-19 in the workplace which should be used in conjunction with this guidance:

- A risk assessment tool which will support FBOs in identifying and documenting the actions they need to take to prevent the spread of COVID-19, whilst maintaining an effective FSMS.

- Self-assessment tools for food businesses and food retail establishments, which will enable FBOs to maintain internal audit records to demonstrate ongoing compliance with COVID-19 protective measures. Use of these tools will allow businesses to demonstrate that they are following the measures required which is important when public health officials are gathering information to assess business compliance and provide...
information to any potential incident management team in the event of a COVID-19 outbreak.

- **Guidance on how to prepare for the investigations that will take place when an outbreak of COVID-19 is suspected in the workforce** and what to expect from an Incident Management Team (IMT) investigation.

Reference to these documents will help FBOs to engage with enforcement authorities on control measures that are relevant to their business and to provide evidence that they are implementing appropriate measures to protect their staff and customers from the risks of infection.

FBOs should note that this guidance deals only with the specific measures that need to be taken to prevent the spread of COVID-19 in the workplace. **In conjunction with this document** FBOs should continue to refer to FSS’s Food Handlers: Fitness to Work guidelines which cover measures that should be taken when dealing with other types of employee illness, in line with their Food Safety Management System.

**It is important to highlight that businesses operating in any part of the food industry in Scotland are expected to adhere to the rules and guidance put in place by the Scottish Government and public agencies as well as relevant guidance and rules issued by the UK Government.**
Steps that need to be taken by all food businesses to prevent the spread of COVID-19

1. Raising awareness across your workforce

- It is essential for FBOs to communicate effectively with all employees, customers and visitors on measures needed to prevent the spread of COVID-19 throughout their business. Managers should provide clear instructions to staff, emphasising the importance of maintaining an effective FSMS, with appropriate COVID-19 controls.

- FBOs should ensure that communication with staff on COVID-19 risks and measures for preventing transmission are refreshed to take account of any updates to guidance and ensure levels of knowledge and understanding are maintained and that messages are not becoming stale. Updates should be provided at team meetings (weekly is suggested), and reinforced through all available channels for staff communications (e.g. TV Screens/Digital Signage, Intranet and Newsletters).

- Language is a critical factor when communicating with employees the importance of COVID-19 controls. **It is important to ensure language is not a barrier.** Simple, clear messaging should be used to explain guidelines using images and clear language, with consideration of groups for which English may not be their first language and those with protected characteristics such as visual impairments. [NHS Inform](https://www.nhsinform.scot) provides general advice on COVID-19 in a range of translated formats which will help to support employees for whom English is not their first language.

- Those at highest risk from COVID-19 (previously referred to as shielding) should follow the same advice as the rest of the population. [Specific guidance](https://www.gov.scot) for those at highest risk details current working restrictions as well as further health advice and support.

2. Promoting effective personal hygiene by all employees

- Ensure staff are practicing good respiratory hygiene at all time – covering their mouth and nose when coughing or sneezing and washing their hands, and disposing of tissues.

- Ensure you have sufficient provision of handwashing facilities and that they are strategically placed to prevent avoidance by staff and allow supervision.

- Ensure all staff are trained in the [effective handwashing technique](https://www.gov.scot) - to wash hands for the required 20 seconds with soap and water – and that the importance of thorough and effective handwashing is reinforced throughout your premises.

- Provide access to hot water, suitable soap and paper towels at every entrance and exit to food production or work areas. Hand towels are recommended over hand dryers which can cause spray resulting in virus particles spreading from hands to other surfaces.
• Access to hand sanitiser may also be helpful in certain areas e.g. as an additional hygiene measure following effective handwashing prior to entering food production areas, or for use by customers and other visitors where hand washing facilities are not available.

• Check hand washing and hand sanitising stations regularly and replenish as necessary to ensure there are always sufficient supplies of hot water, soap and paper towels.

• Ensure that all staff undertake effective handwashing every time:
  - Upon entry to the food production area, and at regular intervals during manufacture/processing/preparation.
  - After using the toilet.
  - Upon exit from communal areas such as staff rooms and canteens.
  - After using computers, phones, door handles and other surfaces across the site.
  - After touching their face, blowing their nose, coughing and/or sneezing.

• Implement measures to monitor handwashing practice at key points and at regular intervals on all production lines and food preparation/handling areas.

3. Implementing physical distancing in the workplace environment

• Physical distancing measures are being slowly eased to enable workplaces to operate in a less restricted way. On 19 July 2021, when Scotland moves to level 0, the following changes will apply in all public places:
  - Physical distancing of 1 metre in indoor public settings (an indoor public settings is defined as any ‘non-domestic premises’), so covers all indoor locations within the workplace including offices, communal areas, canteens and the production floor.
  - No requirement for people to physical distance outdoors in a group of 15. However, there is a requirement for 1 metre physical distancing between different groups of 15.
  - Physical distancing requirements will not be removed until all areas in Scotland move beyond level 0.

• FBOs will need to assess the high risk areas that apply to their own circumstances, taking account of arrangements for staff accommodation, transporting staff to the workplace, and communal spaces on site such as toilet facilities, staff and changing rooms, canteens, smoking areas and hygiene stations. These are all areas where there are opportunities for staff to congregate and it is therefore essential for FBOs to ensure these are considered in the development of plans for controlling the spread of COVID-19.

• Scottish Government has produced guidance on physical distancing in non-domestic premises, which details physical distancing capacity limits and the ask to display this maximum capacity at entrance points of the building to help manage public confidence and compliance.
**Systems for managing the movement of staff**

- Queuing at site arrival/site entry areas can lead to staff grouping in close proximity. Consider staggering start and stop times to avoid crowding, and the use of markings on the ground to ensure staff maintain a 1m distance from each other. Where possible allow a buffer area to avoid close congregation of personnel.

- Consider the implementation of ‘one way’ traffic flows, e.g. ‘keep left’ flows to minimise contact, confusion and reduce time spent in confined areas.

- Consider the need to review your incident and emergency procedures to ensure they reflect the physical distancing principles as far as possible. In an emergency, (e.g. an accident, provision of first aid, fire or break-in), compliance with physical distancing should not impede immediate action needed to protect the lives of employees including evacuation.

**Workflow arrangements**

- Wherever possible, workflow should be re-designed to minimise movements between areas.

- Additional changes for maintaining physical distancing and/or ensuring adequate separation between employees in the workplace will involve:
  - Assigning workstations to single individuals. Where this is not practical, ensure they are shared by the smallest possible number of people.
  - Using ‘one way’ traffic flows to minimise accidental person to person contact.
  - Constructing physical barriers, for example, through the use of cleanable perspex panels between workstations and at customer service areas. It is important that the installation of physical barriers is risk assessed to ensure they do not introduce hazards to the food production system, do not impede ventilation and that they can be cleaned regularly throughout shifts.
  - Using ‘fixed teams’, ‘partnering’ or ‘cohorting’ systems to enable the same groups of employees to work together on the same production lines, workstations or the same areas of the premises each day. These arrangements will help to minimise the number of individuals each person comes into contact with throughout their shift.
  - Running production lines with fewer staff, slower and for longer.
  - Keeping noise and music levels to a minimum where possible and considering methods for enabling staff to communicate without shouting.
  - Minimising access to walk-in fridges, freezers and pantries, for example, with only one person being able to access these areas at one point in time.
  - Ensuring that at the end of shifts, there are measures for preventing staff from congregating in groups.
  - Marking physical distancing spaces at workstations and on production and kitchen floors so they are clearly identifiable.
  - Moving certain tasks where more space is needed to other larger locations where this is practical.
  - Working and seating back-to-back or side-to-side rather than face-to-face.
  - Staggering break times for staff to reduce congestion in communal areas.
• Think carefully about the need for staff meetings, and use remote tools wherever possible to minimise person to person gatherings. Where it is absolutely necessary to meet in person, consider meeting outdoors or in well ventilated spaces. Avoid sharing stationery and ensure hand washing facilities are available.

4. Ensuring effective ventilation in indoor work spaces

• Adequate and good quality ventilation should be standard in indoor commercial spaces and is an important factor in reducing the risk of transmission indoors – businesses should consider current arrangements and whether additional measures are required to make improvements.

• Workplaces should consider in their risk assessment how they can increase the flow of outdoor air into indoor spaces – see COVID-19 Ventilation Guidance for more information on how to improve ventilation.

• It is highly recommended that FBOs also consult the Health and Safety Executive (HSE) on technical matters relating to buildings and infrastructure which are not covered by this guidance for example air conditioning and ventilation. Useful guidance covering ventilation can be found on the HSE, Scottish Government, SAGE and the Chartered Institute of Building Services Engineers (CIBSE) websites. A ventilation advice card, highlighting key ventilation practice within the workplace is also a useful resource.

5. Implementing effective cleaning and disinfection

• Increase the frequency of cleaning schedules of all areas, especially those which are subject to frequent human contact such as workstations, counter tops, toilet facilities, changing rooms, wash stations, canteens and public areas. It is particularly important that all surfaces in any communal areas, for example changing areas and clocking in points are cleaned and disinfected between different groups of staff occupying these spaces.

• The frequency of cleaning and disinfection should be based on risk assessment depending on the usage of the area but it should be scheduled at least every 2-3 hours. Using a disposable cloth, first clean hard surfaces and then disinfect these surfaces following your usual proven procedures with the products you normally use; considering the need for additional measures where appropriate.

• With regard to food contact surfaces and processing equipment, businesses should continue to apply their existing cleaning and disinfection regimes for controlling microbiological hazards in food (such as those outlined in the FSS Guidance on the Control of E. coli O157 Cross Contamination). However, where appropriate, for areas/surfaces where there is more regular human contact, consideration should be given to the need for additional disinfection measures using methods known to be effective against viruses.
- Review cleaning procedures to minimise aerosols, for example by implementing high throughput, lower pressure power washing rather than low throughput/high pressure to prevent spray.

- Although there is a lack of data on the specific effects of disinfectants against the COVID-19 coronavirus, it belongs to a group of viruses called enveloped viruses, which are relatively susceptible to cleaning and disinfection. The evidence shows that similar viruses can be deactivated using many products which are already commonly used in the food sector (including disinfectants based on chlorine, ethanol, hydrogen peroxide or quaternary ammonium compounds). The Society of Food Hygiene and Technology has published a useful guide to cleaning and disinfection regimes in food operations with regard to COVID-19. This provides information on the efficacy of different disinfectants against members of the coronavirus family.

- When purchasing new disinfectant products specifically for decontaminating areas check with your suppliers that these have been certified as effective against enveloped viruses such as coronavirus. It is important to use reputable suppliers when purchasing chemicals for cleaning and disinfection purposes, and to be wary of products making claims that may not be validated. Look out for products bearing the EN 14476:2019 standard which indicates that they have been tested for efficacy against enveloped viruses (although not specifically the virus responsible for COVID-19).

- As the competent authority for biocides, the Health and Safety Executive (HSE) are responsible for authorisations and enforcement of the Biocidal Product Regulation and associated legislation. The HSE have produced a factsheet on the rules (which includes some of the basics), and which you may find useful: Coronavirus (COVID-19) manufacture and supply of surface disinfectants.

- Always ensure chemicals used for the cleaning and disinfection of work surfaces are food grade. It is also important to check that they are safe to use on the intended surface before including them in your cleaning and disinfection regime.

- Government guidance on COVID-19 decontamination for non-healthcare settings advises the use of chlorine based disinfectants such as household bleach, as these are also known to be effective against similar coronaviruses. Chlorine-based chemicals can be corrosive to certain materials, so are not suitable for use in some food production environments. Chlorine based chemicals can also cause taints so should be treated with care/caution and managed through HACCP with controls in place to prevent cross-contamination.

- In circumstances where chlorine based disinfectants can be used safely, the current recommendations are to use either:
  - a combined detergent disinfectant solution, (also known as sanitiser), at a dilution of 1000 parts per million available chlorine (ppm av.cl.)
  - a household detergent followed by disinfection (1000 ppm av.cl.).

- According to guidance produced by The European Centre for Disease Prevention and Control, 1000 ppm av.cl is equivalent to a 1:50 dilution of household bleach products which usually have an initial concentration of 5% sodium hypochlorite.
Always follow manufacturer’s instructions for dilution, application and contact times for cleaning and disinfectant products. Contact time is the time that the disinfectant/bleach solution must be in contact with the contaminated surface, and is particularly important to ensure effectiveness. The recommended contact time for common disinfectants can range from 30 seconds to 10 minutes. It's important to follow instructions as wiping them off too soon could prevent effective disinfection.

Bleach and other chemical disinfectants can be damaging to certain materials so are not suitable for use on objects such as phones, keyboards and electronic devices and for use on some food equipment e.g. soft metals, non-metal parts such as rubber seals and plastics, furnishings such as seating and grips on hand rails. In these cases, disinfectant or alcohol (70%) wipes are more suitable.

Make sure bins are provided for disposal of paper towels/tissues used for cleaning, and instruct all staff that these must be used.

Where food businesses already have procedures in place for the cleaning of bodily fluids, these should be reviewed with consideration of COVID-19. In circumstances where you are concerned that an area could have become contaminated by COVID-19 (e.g. through contact with an infected employee), wear disposable gloves and aprons for cleaning. These should then be double bagged and stored securely for at least 72 hours before throwing away in the usual manner. This is advised by HPS because evidence suggests that under most circumstances, the amount of infectious virus on any contaminated surfaces is likely to have decreased significantly by 72 hours.

It is important to remember that making changes to the frequency and/or methods used for cleaning and disinfection for the purposes of COVID-19 control will have an impact on your business and therefore requires careful consideration. It is advisable to discuss with suppliers the appropriate chemicals to use on surfaces, and whether changes made to cleaning and disinfection regimes could cause chemical residues to build up on food contact surfaces and require additional rinsing to prevent the contamination of food.

The Global Food Safety Initiative has produced a guide on the optimal usage of cleaning agents, sanitisers and disinfectants to minimise the risk of traces in foods. This provides useful information on the selection, storage and handling of cleaning agents, sanitisers and disinfectants, including how to minimise the build up of chemical residues on food contact surfaces.

6. Ensuring appropriate use of Personal Protective Equipment (PPE) and face coverings

Standard Personal Protective Equipment (PPE) must continue to be worn as required, issued by the FBO in line with their existing H&S, FSMS and first aid requirements. In circumstances where PPE is standard issue in a FBO, areas (e.g. lockers and wall hooks) for storing protective clothing such as overalls, aprons, hats, and footwear should be provided. Staff should not remove these items from the premises.

Businesses should ensure there are disposal facilities available which allow single use items such as hairnets and gloves to be disposed of safely, with handwashing facilities provided at these areas. FBOs should provide laundering services for washing re-usable
PPE such as aprons and overalls, and ensure these follow HPS guidelines and that they are carried out at an appropriate frequency.

- Food businesses will need to carry out a H&S risk assessment to determine the need for additional PPE in specific circumstances, against potential negative impacts of its inappropriate application. Consideration also needs to be given to any additional training requirements to ensure it is used safely.

**Face coverings, masks and visors**

- Face coverings continue to be an important mitigation measure for controlling the spread of COVID-19, even as the vaccine is rolled out. When worn correctly, face coverings can provide protection to those around the wearer from droplet and aerosol transmission and they can also provide some protection to the wearer. They also serve a purpose in source control by reducing contamination to the environment surrounding the wearer.

- The wearing of face coverings is mandatory in the following areas:
  - retail premises
  - hospitality settings
  - takeaways
  - cafes
  - workplace canteens
  - communal areas in indoor workplaces, such as corridors and staff rooms, if there are no measures in place to keep people separated by either a partition, or a distance of at least 1 metre.

- Face coverings can be made from cloth or other textiles that cover the mouth and nose, and through which you can breathe. These differ to face masks, which usually refer to the surgical or medical grade masks, that are worn in health and social care settings with other personal protective equipment (PPE). It is recognised that face masks may be appropriate in certain food production environments to protect high-risk foods or where workers are exposed to airborne risks. In these circumstances, FBOs should continue to follow their current policies on the use of face masks.

- **A face visor or shield is not classified as a face covering**, as it does not cover the mouth and nose. Visors or shields are used in certain food production environments (e.g. in meat plants), however evidence suggests that they are unlikely to be an effective control for aerosol transmission of COVID-19. Therefore they should only be regarded as an additional precaution, and never as a replacement for the other ways of managing risk. In situations where visors are being worn by staff and physical distancing cannot be maintained, they should be used in conjunction with a face covering or mask.

- Staff should be reminded of the mandatory requirement to wear face coverings in the workplace, however the responsibility for complying with the requirement to wear face coverings rests with individuals. Employers are urged to take steps in their workplaces to explain and promote this requirement.

- If staff express a preference to wear face coverings as an additional mitigation measure in other areas of the workplace, they should not be discouraged from doing so.
Where a person is exempt from a face covering for medical reasons it is recommend an individual occupation risk assessment is carried out to identify the personal risk from COVID-19. This can help highlight individual risks and identify any additional changes that may be needed to make the workplace and duties safe.

Staff may be exempted from wearing a face covering during food handling tasks, where it has been identified that it may present a risk to the hygiene or safety of the food. In these circumstances, the suitability of face coverings will depend on the nature of the task involved. It is strongly recommended that FBOs undertake a risk assessment to determine if the wearing of a face covering is appropriate to the task and the food business setting, taking account of the health and safety of the wearer and the safety and integrity of the food produced.

Staff should be trained to ensure any type of face covering is fitted and worn correctly and hygienically. All workplaces should also have appropriate disposal and cleaning facilities available for staff to use following removal of a face covering.

7. Ensuring control measures are applied across other areas of the business

Communal areas

- Ensure staff are aware that physical distancing applies to all parts of a business, not just the place where people spend most of their time, but also entrances and exits, hygiene stations, toilets, meeting rooms, break/staff rooms, canteens and similar settings. These are often the most challenging areas to maintain the 1m physical distancing rule.

- Remind staff of the mandatory requirement to wear face coverings when moving around in indoor communal settings where there are no measures in place to ensure separation (e.g. through use of a partition/screen) or 1m physical distancing.

- Review toilet facilities and implement procedures which ensure physical distancing can be maintained outside these areas and when occupied, in order to minimise the risk of person to person contact. Monitor queuing systems at toilets to prevent crowding, and undertake regular checks of handwashing facilities to ensure there are adequate supplies of hot water, soap and paper towels.

- Encourage catering teams in staff canteens to offer take-away pre-packed food items. Cashless payment systems using contactless cards should be implemented where possible.

Staff accommodation and transport

- Where FBOs are responsible for providing accommodation and transport to the workplace for their staff, it is essential that these arrangements are reviewed to ensure they do not present a risk of spreading COVID-19. Scottish Government have produced guidance on workers’ accommodation and transport.

- Shared accommodation presents a particular risk with regard to the spread of COVID-19, and should be always be taken into account when assessing the potential risks to
employees. Wherever possible, FBOs should only provide single occupancy accommodation for workers. Where this is not possible, occupancy in each shared space should be as low as possible, and restricted to the same groups, preferably those who also work together. FBOs will also need to make arrangements which enable symptomatic workers to self-isolate within the accommodation.

- Consideration will also need to be given to measures for maintaining physical distancing in communal spaces such as kitchens and living areas in the accommodation. It is also important that these spaces have appropriate facilities (wash hand basins, sanitising dispensers etc) which enable occupants to maintain effective hand hygiene.

- All arrangements for those staff who need to travel to work should be reviewed and consideration given to the need for additional measures to ensure safe travel, including applying effective hand hygiene before and after journeys. Additional guidance from Transport Scotland can be found on how to travel safely.

- Workers should be encouraged to avoid shared transport but in situations where this is unavoidable:
  - Encourage arrangements which ensure the number of workers in each vehicle is kept to a minimum, for example by organising more trips with fewer people in each vehicle.
  - Where possible, restrict car sharing to groups of people who share accommodation and use the same work area. It is advisable to record contact details of those who car share.
  - All employees should be advised to wear face coverings in shared vehicles (as required when using public transport).
  - Vehicles should be well ventilated (i.e. by keeping the windows open), and passengers should face away from each other wherever possible.
  - All employees should be instructed not to use shared transport if they are displaying symptoms of COVID-19 and should stay at home and follow government guidance on self-isolation. Encourage drivers or designated persons to check employees prior to boarding vehicles to ensure those who have suspected symptoms do not travel and return to their accommodation.
  - Shared vehicles, including minibuses, should be cleaned regularly using gloves, with particular emphasis on handles and other areas where passengers may touch surfaces.

**On-site visitors**

- Non-essential visits from external parties should be prohibited wherever possible. Essential visitors including enforcement officials such as Environmental Health Officers, Official Veterinarians and Meat Hygiene Inspectors will be fully trained in COVID-19 requirements and will expect strict site protocols to be in place.

- Make sure that all essential visitors to the site are aware of the Government guidelines and adhere to company protocols. Limit the number of visits by requiring orders to be made online or by telephone and restrict access to the premises through the use of posters and markings and by designating delivery and pick up areas. If any essential visitors display or report having suffered from COVID-19 symptoms they must not be allowed on site.

- Where essential visitors are required to spend time on site, take appropriate measures to separate them from employees wherever possible. Ensure the physical distancing
requirements are adhered to during interactions with on-site staff and, where possible, designate separate waiting areas and toilet facilities in order to minimise contact with employees.

- Ensure delivery drivers adhere to physical distancing and hygiene requirements both upon collection, and when they are delivering food to customers. Drivers should also be required to wear a face covering when they are picking up and delivering orders.

8. Implementing customer control measures in food retail and catering businesses

- It is critical that FBOs in the retail and catering sectors ensure they and their staff are familiar with Scottish Government’s guidance on COVID-19 for Tourism and Hospitality and Retail. The key COVID-19 control measures for customers in these businesses are outlined below.

- Apply queue management and walkway systems which enable staff and customers to move through the premises maintaining physical distancing. Ensure any changes to entrances, exits and queue management take into account reasonable adjustments for those who need them, including disabled shoppers. For example, maintaining pedestrian and parking access for disabled customers.

- Consider the use of screens to create a physical barrier between people e.g. at payment points and table partitions. Ensure such barrier does not impede effective ventilation.

- Create signage to remind customers and staff of the requirements to wear face coverings where appropriate (see section Face masks, coverings and visors). Although it is not a legal requirement to wear face coverings outdoors, it is good practice to encourage customers to wear them when queuing and collecting orders.

- Increase the frequency of cleaning in communal and service areas, especially hand touch surfaces, such as table tops, payment devices, keypads, grab-rails, elevator buttons, light switches, door handles, and cutlery, and any surface or item which is designed to be, or has a high likelihood of being touched.

- Provide handwashing facilities and/or hand sanitiser at entry and exit points, and at common areas such as payment points and encourage their use through signage.

- Wherever possible, require customers to order online, using apps or over the telephone to reduce queues and manage collection/pick-up times. Encourage contactless payments wherever possible.

- During outdoor food collection and payment, ensure there is adequate separation between front of house serving staff and customers. Create a physical barrier such as a screen, and where this is not possible, staff should wear face coverings as a precautionary measure.

- Introduce table service only systems (i.e. no standing) to prevent customers from gathering at bar areas. Restrict unnecessary movement within service areas, for example by ensuring
customers are discouraged from returning empty glasses and crockery by waiting staff or through the use of clearly displayed signage.

- Limit customer contact with shared items by providing single use, individually wrapped condiments and clearly displaying food and drink options in central locations (e.g. posters, screens, blackboards) or through the use of laminated menus which can be cleaned and disinfected after each use.

- Ensure customers comply with Test & Protect protocols and provide contact details for tracing purposes (see section 10).

9. Acting quickly when a member of staff displays symptoms of COVID-19

- As part of risk assessments, companies should explore with trade union or workforce representatives how to respond should anyone develop symptoms while at work, including whether it is possible to identify any particular parts of the site the individual may have accessed or equipment used while symptomatic.

- All staff should know that anyone experiencing symptoms in the workplace should be sent home immediately to self-isolate. If they need clinical advice, they should refer to the NHS Inform website or call 111 if they don’t have internet access. In an emergency, they should call 999 if they are seriously ill or injured or their life is at risk. They should not visit the GP, pharmacy, urgent care centre or a hospital.

- The approach of employers in relation of COVID-19 symptoms within the workplace should be consistent with the guidance available on the Scottish Government Test and Protect webpage.

- Consideration should also be given to the need for additional cleaning and disinfection of areas used by individuals displaying symptoms of COVID-19. Guidance on appropriate environmental decontamination (cleaning and disinfection) after a possible case has left the workplace can be found in Public Health Scotland’s (HPS’s) Guidance on COVID-19 for non-healthcare settings.

10. Ensuring employees understand what they need to do if they develop symptoms and your role in Scotland’s Test and Protect strategy

- Staff should be fit for work at all times. They must not be suffering from, or carrying, any illness or disease that could cause a problem with food safety. FBOs must ensure that all staff understand the business’ Fitness to Work policy. During the current COVID-19 situation this will need to take full account of government advice on the need for individuals to self-isolate and stay at home when they are experiencing symptoms of COVID-19. It is therefore important to ensure staff are able to recognise these symptoms, which include a new continuous cough and/or a fever or loss of, or change in, sense of smell or taste (anosmia). There is a helpful “symptom checker” available on the NHS Inform website which guides individuals through potential symptoms and provides advice on the steps that need to be taken if they have any concerns.
FBOs must ensure that all staff are aware that they must stay at home and self-isolate if they or a household member develop symptoms of COVID-19 or they are identified as a contact of a case of COVID-19 through the test and protect programme, and managers should support them in doing this. Public health advice on self-isolation and staying at home should be communicated to all staff, checked and verified as part of every food business’s return to work procedures.

All FBOs will need to be familiar with Scottish Government’s Test and Protect Advice for Employers, which outlines how to support employees who are required to self-isolate. It is essential that steps are taken to enable all staff to comply with the requirements of Test and Protect and that they are encouraged to report to their managers when they are experiencing symptoms.

Businesses are encouraged to take part in twice weekly lateral flow device testing of staff, which is offered to all businesses with more than 10 employees.

Staff who have experienced symptoms of COVID-19, however mild, must stay at home and self-isolate for 10 days from when their symptoms started and until they have had no fever for 48 hours. NHS contact tracers will interview them and get in touch with people they have been in close contact with, and tell them they must self-isolate for 10 days. Anyone experiencing symptoms of possible COVID-19 should arrange to get tested in line with Scotland’s Test and Protect Strategy.

NHS Inform advises that people who develop symptoms are very unlikely to pose an infection risk to other people beyond the 10th day of illness, so these people can return to some of their normal activities at this point but must continue to abide by the Scottish Government’s coronavirus advice. However, managers should be aware that employees may be required to self-isolate for longer periods depending on medical advice based on the severity of their symptoms. All staff should be encouraged to contact their line manager and HR/Occupational Health Advisors before returning to work in order to ensure that their fitness to work can be assessed and an appropriate timetable agreed for resuming their normal duties.

Individuals who live in a household with anyone showing symptoms, must self-isolate for 10 days, even if they don’t have symptoms themselves. This includes those sharing households with multiple occupants and those living in accommodation with shared bathroom and/or kitchen and living facilities. The 10 day period starts from the day illness began in the first person. If the contact of that individual then develops symptoms within the 10 days, they need to stay at home for 10 days from the day their symptoms began. They should do this even if it takes them over the initial 10-day isolation period. Close contacts of people who have COVID-19 who do not share the same house as the case will be contacted as part of the ‘Test and Protect’ programme and asked to isolate for 10 days.

In order to support Test and Protect, it is important that FBOs have clear and robust records of staff working on each shift, the make-up of teams and details of any visitors to the site, in case of need to contact trace.

It is a mandatory requirement for FBOs in the hospitality sector to collect customer/visitor information needed to assist NHS Scotland’s Test and Protect service, and share these...
details with public health officers for the purposes of customer contract tracing when requested. Note that each customer/visitor is now required to give details. Further guidance on the collection of customer information by hospitality businesses in Scotland can be found in the Scottish Government tourism and hospitality sector guidance.

- FBOs should also consider whether the testing of employees can be used to support their return to work policy. Scottish Government has produced guidance on COVID-19 testing and the eligibility of key workers for such testing, which includes those in the food industry, to support them returning to work where it is safe to do so. It is also important to understand NHS guidance on testing procedures and when it is safe to return to work after a negative result.

- Scottish Government do not recommend temperature checking employees as a means of testing for COVID-19 due to the low efficacy rate of this method. Further information about the reliability of temperature checking as a test for COVID-19 can be found on the MHRA website.

**11. Identifying potential outbreaks in your workforce and actions to take**

- FBOs should monitor reports of illness across their workforce in order that they are able to take rapid action when there may be an outbreak of COVID-19 in their workforce. If an outbreak is confirmed you will be asked to record details of symptomatic staff and assist with identification of contacts. Identification of an outbreak will also require you to review your COVID-19 control plan and identify any breakdown which may need to be addressed to prevent future incidents.

- FBOs should suspect an outbreak if there is either:
  - Two or more confirmed cases of COVID-19 in the setting within 14 days OR
  - An increase in the background rate of staff absence due to suspected or confirmed cases of COVID-19.

- If food business suspects a COVID-19 outbreak, they should immediately inform their local NHS board Health Protection Team (HPT). In the event of an outbreak FBOs should continue to follow this guidance to reduce risk. The HPT will undertake a risk assessment and conduct a rapid investigation to advise on the most appropriate action to take. Staff who have had close contact with case(s) will be asked to self-isolate at home. In some cases, a larger number of other staff may be asked to self-isolate at home as a precautionary measure. Where settings are observing guidance on infection prevention and control, which will reduce the risk of transmission, the HPT will take this into account in determining whether closure of the whole setting will be necessary.

- HPTs may themselves identify clusters of cases amongst your employees through ‘Test and Protect’. In this situation, you will again be asked to support the HPT with further investigation, communication with the workforce, and review of existing control measures. It is advisable for FBOs to identify a single point of contact to act as liaison with Health Protection Teams for any matters relating to Test and Protect, reporting potential outbreaks and seeking advice on matters relating to COVID-19 illness in your

foodstandards.gov.scot
workforce. You can find contact details for your Local Health Protection Team in the HPS guidance for non-healthcare settings.

- Depending on the risk assessment outcome, the HPT may establish an Incident Management Team (IMT) to help manage the situation. The IMT will lead the Public Health response and investigations, and work with the business to put appropriate interventions in place. These will generally include ensuring that the preventive measures described in this guidance are fully implemented. Other measures may include:
  - Cleaning in the setting: for cleaning and waste management, refer to HPS guidance on cleaning in non-healthcare settings.
  - Consider wider testing of affected population and staff.
  - Information: ensure that staff (and other relevant people) are aware of what has happened and the actions being taken.
  - Closure: may be required following advice from the Health Protection Team and Incident Management Team. The FBO may make their own decision on closure ahead of this advice as a precaution or for business continuity reasons.

The Health Protection Team or Incident Management Team will declare when the outbreak is over.

FSS has produced more detailed guidance on the investigation of COVID-19 outbreaks in food businesses.

12. Staying informed

- This is a dynamic situation and the official guidance from Scottish Government, Health Protection Scotland, NHS Inform, Gov.uk and the Food Standards Scotland website changes frequently. The Institute of Food Science and Technology has also developed a COVID-19 knowledge hub which aims to consolidate advice, practical guidance and links to resources to support food businesses. Make sure you keep yourself and staff on site up to date by regularly referring to all of the resources referenced throughout this document.

- FBOs should be aware that this guidance is not legal advice, and we would recommend that you seek your own advice to ensure compliance with all legal requirements. Your Local Authority Environmental Health Department can also provide you with practical advice on infection prevention and control and food safety management which is appropriate to your circumstances.

- FBOs should be aware that Local Authorities have enforcement powers to target risky and non-compliant practices, to identify and rectify any issues of non-compliance within the hospitality sector. The Scottish Environmental Health/Trading Standards Expert Working Group in conjunction with the Scottish Government has produced supplementary Q&A for the hospitality industry and it is available on the REHIS website.

- Employers should also refer to guidance published by The Equalities and Human Rights Commission for further details on their legal obligations to staff with regard to decisions taken in response to COVID-19.
<table>
<thead>
<tr>
<th>version</th>
<th>date</th>
<th>summary of changes</th>
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<tbody>
<tr>
<td>1.0</td>
<td>02/04/2020</td>
<td>• First version of document</td>
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</tbody>
</table>
| 1.1    | 09/04/2020   | • Clarification of questions  
• Clarification of cleaning and disinfection procedures  
• Clarification on the use of PPE to reflect current government advice that face masks not recommended outwith healthcare settings |
| 1.2    | 29/05/2020   | • Links to the Scottish Government Route Map (Phase 1) and sectoral guidance for easing lockdown.  
• Extension of scope to cover food business re-start  
• Clarification of cleaning and disinfection procedures  
• Updating of social distancing procedures to align with government advice  
• Clarification on the use of face masks and face coverings in light of government advice.  
• Clarification on how self-isolation and staying at home guidance translates to return to work policy.  
• Updated links to external guidance documents.  
• Reference to Test and Protect Strategy |
| 1.3    | 19/06/2020   | • Reviewed following the First Minister’s announcement of Phase 2 of the Routemap (change to introduction).  
• Further clarification on the use of PPE, face masks and face coverings and fitness to work policy. |
| 1.4    | 14/07/2020   | • Re-formatting with further information on physical distancing considerations for shared staff accommodation and transport  
• Guidance for pubs and restaurants allowed to re-open in Phases 2 and 3 of the Scottish Government Route Map.  
• Links to Scottish Government Guidance on COVID-19 for the Hospitality and Tourism and Retail Sectors  
• Link to UK Hospitality Guidance  
• More detail on FBO obligations with regard to Test and Protect strategy.  
• Updating of Scottish Government’s Physical Distancing Requirements for Retail and Hospitality  
• Reference to changes to physical distancing rules for retail, pubs and restaurants.  
• Updating of Scottish Government’s position on the use of face coverings including the introduction of mandatory wearing of face coverings in shops. |
| 1.5    | 27/07/2020   | • Additional information on shielding.  
• New section on the identification and investigation of outbreaks in the workforce.  
• Reference to Legionella risks for premises which have been closed for prolonged periods and links to HSE guidance.  
• Reference to Equalities and Human Rights guidance |
| 1.6    | 04/08/2020   | • Amendment of section on employees who are in the shielding category (Section 1B)  
• Updating of advice on self-isolation of staff showing symptoms of coronavirus |
| 1.7    | 10/08/2020   | • Amendment of section on takeaways to reflect the mandatory wearing of face coverings (as updated by Scottish Government on 7 August 2020)  
• Updating of section on face shields/visors to take account of new evidence |
| 1.8    | 31/08/2020   | • Updating of advice relating to individuals who were shielding and those at increased risk of infection.  
• Addition of extra questions. |
<table>
<thead>
<tr>
<th>Date</th>
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<tbody>
<tr>
<td>24/09/2020</td>
<td>• Removal of dates regarding implementation of mandatory wearing of face coverings.</td>
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<tr>
<td></td>
<td>• Addition of increased cleaning as an additional mitigation measure for hospitality businesses moving from 2m to 1m distancing.</td>
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<tr>
<td></td>
<td>• Addition of link to Q&amp;A for hospitality businesses on REHIS website.</td>
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<tr>
<td></td>
<td>• Addition of text highlighting mandatory requirements for the hospitality sector to collect customer information.</td>
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<tr>
<td>21/09/2020</td>
<td>• Addition and updating of text to highlight the introduction of mandatory wearing of face masks by customers and staff in indoor hospitality venues.</td>
</tr>
<tr>
<td>24/09/2020</td>
<td>• Addition of advice regarding temperature checking staff as an unsuitable means of testing for COVID-19.</td>
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<td>• Addition of information on the Test and Protect Contact Tracing App.</td>
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<tr>
<td>08/10/2020</td>
<td>• Addition of mandatory wearing of face coverings in indoor communal areas in workplaces.</td>
</tr>
<tr>
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<td>• Reinstigation of advised 2m physical distancing in retail.</td>
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<tr>
<td></td>
<td>• Link to MHRA evidence on the unsuitability of temperature checking of staff for COVID-19.</td>
</tr>
<tr>
<td>09/10/2020</td>
<td>• Clarification on the status of requirements on face covering in indoor communal areas, following the First Minister’s statement on 7 October 2020.</td>
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<tr>
<td>19/10/2020</td>
<td>• Addition of mandatory wearing of face coverings in workplace canteens and indoor communal areas. Regulatory details and dates added.</td>
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<tr>
<td>30/10/2020</td>
<td>• Addition of Coronavirus (COVID-19): Scotland’s Strategic Framework details and link, including the need for businesses to consult the levels framework.</td>
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<td></td>
<td>• Change to Shielding advice in line with Strategic Framework</td>
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<tr>
<td></td>
<td>• Editing section 3 titles to include additional COVID-19 control measures, alongside physical distancing.</td>
</tr>
<tr>
<td>07/12/2020</td>
<td>• Inclusion of cohorting principles.</td>
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<td>• Addition of precautionary measures for delivery drivers of food retail.</td>
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<td></td>
<td>• Addition of face covering exemption card details and where to obtain one.</td>
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<td></td>
<td>• Insertion of details and link to FSS self-assessment audit tools.</td>
</tr>
<tr>
<td>14/12/2020</td>
<td>• Update of self-isolation period to 10 days from 14 days.</td>
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<tr>
<td>08/01/2021</td>
<td>• Amendment of section on employees who are in the shielding category (Section 1B).</td>
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<tr>
<td></td>
<td>• Removal and editing of various out of date hyperlinks.</td>
</tr>
<tr>
<td></td>
<td>• Addition of Scottish Government workers’ accommodation guidance and transport guidance.</td>
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<td></td>
<td>• Addition of Scottish Government ventilation guidance.</td>
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<tr>
<td>19/01/2021</td>
<td>• Editing of takeaway advice, reflecting the no-indoor entry restrictions in line with Scottish Government guidelines.</td>
</tr>
<tr>
<td>15/03/2021</td>
<td>• Updating of language used, to ensure all text is in line with current COVID-19 situation.</td>
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<tr>
<td></td>
<td>• Insertion of updated Scottish Government Strategic Framework link.</td>
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<tr>
<td></td>
<td>• Insertion of section on vaccination along with links to additional information.</td>
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<tr>
<td></td>
<td>• Summary blue box text changes to reflect importance of FACTS across all businesses.</td>
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<tr>
<td></td>
<td>• Shielding section updated text, highlighting where all up to date information can be found.</td>
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<tr>
<td></td>
<td>• Face covering language edited and indoor communal area use clarified. As well as, addition of the British Retail Consortium specification for textile barrier face coverings.</td>
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<tr>
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<td>• Addition of Transport Scotland advice on how to travel safely.</td>
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<td>1.20</td>
<td>26/04/2021</td>
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| • Enhanced focus on improved ventilation across all areas of the workforce.  
• Insertion of ventilation advice card.  
• Deletion of non-indoor entry restrictions for takeaway establishments in level 4 lockdown areas.  
• Reminder that within the hospitality sector everyone is to observe the requirement to remain at least 1 metre from the next person, unless from the same household or a carer.  
• Addition of the mandatory collection of customer/visitor contact details from each person (not just one household) in the hospitality sector.  
• Updated Equality and Human Rights Commission wording.  
• Insertion of Scottish Government guidance on physical distancing in non-domestic premises. |

<table>
<thead>
<tr>
<th>1.21</th>
<th>19/07/2021</th>
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| • Removal of FACTS  
• Changing of physical distancing requirements in line with Scottish Government restrictions  
• Deletions of outdated text and consolidation of repetition, with editing of headings for easier readability |