COVID-19

Guidance for food business operators and their employees

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

Introduction

It is essential for the food sector to prioritise the safety of their staff as a critical resource and to ensure all of their employees are following government guidance on infection prevention and control measures against COVID-19. **There is currently no evidence that food or food packaging is a source or vehicle of transmission for the COVID-19 virus.** However, it is more important than ever for food businesses to implement effective Food Safety Management Systems (FSMSs) including thorough hygiene practice and the application of Hazard Analysis and Critical Control Point (HACCP), which are essential in controlling microbiological risks in food production. **FBOs should also be placing emphasis on health and safety (H&S) procedures and infection prevention and control measures to stop the spread of COVID-19. Physical distancing plays a critical role in preventing the spread of COVID-19 in food production and handling environments, and both managers and staff should ensure this is adhered to wherever possible in order to prevent the spread of the virus.**

This guidance outlines ways that physical distancing and other mitigation 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 striving to return to a more normal life for as many people as possible.

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, including whether they are permitted to operate.

It is recognised that many food businesses will have already enhanced their existing hygiene controls and applied additional measures to ensure that they are protecting their staff from COVID-19. **However it is critical for all FBOs to continue to refer to this guidance to review, adapt and maintain the measures needed to prevent the spread of COVID-19 across all of their operations.**

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. It 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.
The vaccine represents an important step in our progress towards a safer return to workplaces. Evidence to date shows it will reduce both mortality and morbidity, however we do not know the extent to which the vaccine reduces transmission of the virus from an infected person to others. That is why it is important for businesses and employees to act responsibly, follow FACTS and continue to align their approach with published guidance. Further information and guidance available at Coronavirus (COVID-19) vaccination.

COVID-19 MITIGATION MEASURES APPLICABLE TO FOOD BUSINESSES

In line with Scottish Government advice, all food businesses are required to follow FACTS:

- F – face coverings (ensure staff and customers adhere to the mandatory requirements, and that workplaces endorse and support staff in following best practice in the use of face coverings)
- A – avoid crowded places (ensure physical distancing is adhered to throughout the workplace, and that measures are in place to ensure there are no opportunities for staff and customers to congregate)
- C – clean hands and surfaces regularly (strengthen adherence to hand hygiene practice and apply effective cleaning and disinfection throughout the workplace)
- T – the two metre rule should be applied wherever possible ensuring exceptions are only applied where the circumstances permit and other mitigation measures are in place
- S – ensure all staff self-isolate and get tested if they have any of the COVID-19 symptoms, and are supported by managers

Other considerations for FBOs which are not covered by this guidance

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. FBOs 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

Before using this guidance it is important for all FBOs to assess the extent to which their existing FSMS, H&S procedures and infection prevention and control measures will prevent the spread of COVID-19 in their premises and protect their staff from infection.

The following questionnaire will support managers in assessing where there is a need to strengthen their existing controls, and areas where any of the additional measures outlined in this guidance should be implemented. It should be noted that FBOs who identify any gaps or inadequacies in their current procedures (which they are unable to address by implementing the controls described by this guidance) should carefully consider their ability to operate safely at this time, or whether they will need to remain closed until the Government advises that physical distancing requirements and other COVID-19 control measures can be relaxed.

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 whether you need 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 meet the requirements relating to physical distancing – maintaining a distance of two metres between people (or, where appropriate, in the case of hospitality, one metre with additional risk mitigation measures) – 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 (following risk assessment), the wearing of face coverings?

7. Are you able to take measures to increase the 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?

18. Are you aware of the opening and operational requirements for your business in relation to the Coronavirus (COVID-19): Scotland’s Strategic Framework and your local protection area?
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 which are permitted to open, 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:
   - Food Standards Scotland web-page on coronavirus and food
   - COVID-19 Information and Guidance for non-healthcare settings published by Health Protection Scotland
   - Scottish Government COVID-19 guidance on creating and maintaining safer workplaces
   - Scottish Government: general guidance on coronavirus
   - Scottish Government Sector Guidance for Easing Lockdown
   - Scottish Government Guidance on the wearing of face coverings
   - NHS Inform
   - Gov.uk Coronavirus – What you need to know
   - Gov.uk Guidance for employers and businesses on coronavirus (COVID-19)
   - Food Standards Agency Guidance on hygiene and food safety requirements for food businesses to reopen and operate safely during COVID-19.
   - Gov.uk (Department for Business, Energy and Industrial Strategy) Sectoral Guidance on Working Safely during Coronavirus
   - A Q&A on COVID-19 and food safety has also been published by the European Commission.
   - Health and Safety Executive: working safely during the coronavirus outbreak

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 and physical measures for preventing the spread of COVID-19 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

a) Ensuring all employees understand the risks and how to avoid them

- 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 and, in particular, the role of thorough and frequent handwashing in preventing the spread of COVID-19. Measures for implementing physical distancing should also be effectively communicated across the site. Refer to the Scottish Government, NHS Inform and Gov.uk websites for the most up to date information. Food Standards Scotland is also updating its website regularly with new advice on food related issues.

- 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. Posters, leaflets and other materials are available online which can be used to reinforce these messages throughout the workplace. NHS Inform also 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.

b) Ensuring managers provide support for employees who are at increased risk from COVID-19

- Shielding is a measure to protect those at very high risk of severe illness by minimising all interaction between them and others.

- Specific guidance for those on the shielding list can be found at support for shielding on mygov.scot. This includes information on:
  - working in current restrictions
  - financial assistance
  - Chief Medical Officer letters

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** - 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 and other COVID-19 control measures across all areas of your business**

• COVID-19 is a risk that must be incorporated into all workplace risk assessments, and FBOs must therefore carry out a COVID-19 risk assessment if they have not already done so. **The need for measures to ensure physical distancing between people is the most important part of any COVID-19 risk assessment**, and it is critical that this takes account of all parts of your business where there may be a risk of transmission between staff and/or customers.

• It is therefore important for all staff to understand that these risks do not only apply to food production areas. Careful consideration must also be given to other parts of the workplace where there is scope for people to congregate in groups and physical distancing and hygiene measures will be needed to prevent the virus from spreading.

• 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.

- Adequate and good quality ventilation should be standard in indoor commercial spaces – businesses should consider current arrangements and whether additional measures are required to make improvements. [HSE guidance](#) on this issue may be helpful.

- Scottish Government have 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.

- Further details on physical distancing and additional control measures that will need to be considered for different food production and service environments is provided in sections A-E below.

a) Considerations for employee 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](#). These FBOs should give particular regard to the following:

**Accommodation**

- 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.

- 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. FBOs will need to take steps to ensure all occupants understand the risks of COVID-19 and the measures needed to prevent the spread of the virus. Physical distancing and hygiene measures should be reinforced through training and the display of posters throughout the accommodation.

- FBOs will also need to make arrangements which enable symptomatic workers to self-isolate within the accommodation. This will require provision of dedicated single occupancy accommodation which workers can be moved into as soon as they report symptoms. Enhanced cleaning and disinfection regimes will also need to be implemented in accommodation used by symptomatic employees following periods of self-isolation, particularly during changeover periods (see [Section 4](#)).

**Transport**

- 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 these staff are able to maintain physical distancing when using public or private transport, and are applying effective
hand hygiene before and after journeys. For employees who live a reasonable distance from their workplace, the best and advised option is to walk or cycle.

- FBOs which currently offer staff transport may need to re-schedule trips or offer an enhanced service to facilitate appropriate physical distancing. In light of the requirements, managers should also discuss with staff the need to review other travel arrangements such as car sharing.

- 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.
  - Further advice on physical distancing in relation to travelling to and from the workplace, and cleaning procedures which can be applied when a person becomes ill whilst travelling, is covered in the guidance produced by Health Protection Scotland. Additional guidance from Transport Scotland can be found on how to travel safely.

b) Ensuring physical distancing and other COVID-19 control measures on site

- Consider measures that may need to be taken to reduce the risks of COVID-19 in buildings. Useful guidance on how to prevent the virus spreading through heating, ventilation and plumbing systems has been produced by the HSE, Scottish Government, SAGE and the Chartered Institute of Building Services Engineers (CIBSE).

- Implement home working for office-based staff and promote the use of teleconferencing or videoconferencing for meetings, even between people in the same building. Ensure training for the workforce working from home has been considered.

- All non-essential movement between sites should cease wherever production and safety allows it. When these restrictions are in place, measures should be put in place to ensure they are adhered to by all staff.

- Wherever possible, workflow should be re-designed to minimise movements between areas. For example consider reducing the number of staff required to move goods between two areas and where there is scope to minimise opportunities for repeated contact with surfaces e.g. by keeping non-firedoors open to reduce the need for hand contact.
Consideration should be given to office based staff, managers and other employees (including cleaners) who do not routinely work on the factory/shop floor. This is important both to ensure that COVID-19 control measures are being implemented effectively within all areas of the workplace, including the office environment, and also that these staff do not compromise any of the controls that are in place to prevent the spread of the virus elsewhere in the premises.

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. Adherence to physical distancing will also need to be considered in circumstances where visits from third party certification auditors are a contractual requirement.

Make sure that all essential visitors to the site are aware of the Government guidelines on physical distancing and hygiene, and adhere to company protocols. Limit the number of visits by requiring orders to be made on-line or by telephone and restrict access to the premises through the use of posters and markings (e.g. for two metre spacing) and by designating delivery and pick up areas. Minimise contact between essential visitors and staff through the use of screens and encouraging contactless payments.

Essential visitors such as delivery drivers should also be required to complete a declaration which specifically refers to absence of COVID-19 symptoms (a high temperature (fever), or a new, continuous cough or loss of/change in sense of smell or taste). If possible, this should be provided electronically (e.g. via smart phone), immediately prior to arrival on site in order to minimise contact with employees. If any essential visitors display or report having suffered from these 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 2m 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.

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 2m 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.

c) Ensuring physical distancing and other COVID-19 control measures in food production, handling and service areas
• It is essential that FBOs take all possible steps to ensure appropriate physical distancing is adhered to in all food production, handling and service areas. Wherever possible, make changes to workflow which enable employees to work 2m apart from each other by rearranging workspaces, running production lines with fewer staff, slower, and for longer, or moving to a shift working pattern. **Reduced staffing levels will have an impact on productivity but this may be necessary to protect staff and maintain output.**

• Additional changes for maintaining 2m physical distancing and/or ensuring adequate separation between employees 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. It is important that the installation of physical barriers is risk assessed to ensure they do not introduce hazards to the food production system, and that they can be cleaned regularly throughout shifts to prevent microbiological cross contamination.
  - 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 (see below).
  - Keeping noise 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, or when lines stop during production 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.
  - Staggering break times for staff to reduce congestion in communal areas (see below).

• Arranging staff into ‘fixed teams’ or ‘cohorts’ can help to minimise contact between individuals in the workplace and reduce the risk of spreading COVID-19. When implementing these systems the following principles should be applied:
  
  - Group staff which work at the same time (shift) and/or in the same space (area of work).
  - Cohorts should be as small as practicably possible.
  - Members of the same cohort should be visibly recognisable.
  - Staff should be regularly supervised and monitored to ensure they remain in their designated cohort.
  - Ensure all members and activities associated with each cohort can be identified and records retained for at least 2 weeks.
  - Cohorts should reflect similar travel to work patterns wherever possible.
  - Special attention needs to be placed with those individuals in “butterfly” groups like Engineers, QA and Operations Managers, whose jobs tend to take them to many areas of a facility. For these groups, movements should be minimised as much as
possible, and strict COVID-19 control measures followed at all times (i.e. ensuring distancing from other staff, personal hygiene and the wearing of face coverings).

- **Careful consideration should be given to the need to continue any activity which cannot be undertaken in a way that ensures physical distancing/separation can be maintained at all times.** Health Protection Scotland advises that all tasks should be adapted to ensure physical distancing is adhered to as far as possible. Where there are particular activities that are deemed essential, but cannot be undertaken in a way that ensures physical distancing is maintained, any time spent at less than 2m should be kept to an absolute minimum, with the maximum possible distance between people. Where it is practical and safe to do so, such activities should also be undertaken with individuals working back-to-back or side-to-side rather than face-to-face. Additional precautionary measures such as the use of face masks and/or other Personal Protective Equipment (PPE) may also be appropriate for such occasional circumstances where specific essential tasks present particular challenges with regard to physical distancing (see section 5).

d) **Ensuring physical distancing and other COVID-19 control measures in staff communal areas**

- 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 2m physical distancing rule.

- Communal areas such as staff rooms, changing areas, toilets and smoking areas provide a key opportunity for personnel to congregate and invade physical space. FBOs must therefore make changes that will allow for additional space in these areas to allow employees to spread out more.

- Staff should be reminded of the mandatory requirement to wear face coverings in indoor communal settings including staff canteens and corridors.

- 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, and the need for floor signage to ensure the 2m distancing rule is maintained. Avoid sharing stationary and ensure hand washing facilities are available.

- Wash areas and toilets can present particular issues, particularly at the end of break times where there is more risk of congestion and air moisture content is higher than normal. Maintain 2m distancing in these areas through the use of signage to restrict the number of people that are able to enter at any one time. Ensure toilet and wash facilities are cleaned and disinfected at frequent intervals throughout the working day (see section 4).

- If it is not possible to provide additional communal space for break times, develop a rota system for staggering breaks to control the number of people using communal spaces and corridors at any one time. Also consider extending workers’ break times in order to give them more time to reach their break area to avoid crowding in corridors and walkways.
• Where on-site canteens are continuing to operate, catering teams should be encouraged to move to a take away system, offering pre-packed food items and individually wrapped cutlery and condiment packages. Implement cashless payment systems using contactless cards where possible.

• Canteen and eating areas should be well ventilated, and organised so that physical distancing is possible, and measures taken to minimise the number of people in the canteen at any one given time, for example by using a rota. If staff are bringing their own food to work, consideration will need to be given to facilities that allow the storage, chilling and re-heating of food, and ensure allergen risks are controlled. Appropriate space should be used for taking breaks which enable 2m physical distancing to be observed, for example outdoor areas, parked vehicles and offices which are not in use.

• Increase the frequency of cleaning in communal areas, especially hand touch surfaces, such as table tops, drinks levers, 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.

• Any on-site retail establishment should put controls in place that ensure all staff adhere to physical distancing requirements i.e. are kept 2m apart, or 1m with additional risk mitigation such as the wearing of face coverings.

e) Ensuring physical distancing and other COVID-19 control measures in customer areas

General considerations

• Manage the flow of customers within the premises by calculating the maximum number that can maintain physical distancing at any one time who are able to enter at any one time. Take into account total floorspace as well as likely pinch points and busy areas.

• On arrival, ensure customers are made aware of physical distancing, hygiene requirements, and the need to wear a face covering. These requirements can be highlighted by displaying signage/posters in prominent positions on the premises, or informing customers in advance by phone, on your website or by email.

• Implement queue management, one way flow systems and the use of floor markings to ensure staff and customers are able to move throughout the premises in a way which ensures physical distancing can be maintained and that opportunities for crowding and congestion are minimised.

• 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.

• Ask customers to avoid handling products and objects wherever possible, and to apply effective hand hygiene practice on arrival and at appropriate points throughout the premises. Encourage customers to use handwashing facilities or hand sanitiser at entry and exit points, and at payment areas to be used following transactions.
• Introduce screening at customer service areas and contactless payment systems where possible. Ensure supplies of hand sanitiser are maintained at these areas for customers and staff to use following transactions.

• 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. Display posters on effective hand washing practice in all toilets and washrooms. Implement effective cleaning and disinfection at all toilet facilities at a frequency which is appropriate to capacity and levels of usage. Further guidance on the safe opening of public toilets has been published by Scottish Government.

• Implement frequent and effective cleaning and disinfection regimes at all service and payment areas. Identify objects and surfaces that are touched regularly such as door handles, table and counter tops, ordering/payment devices, and implement procedures for ensuring they are cleaned and disinfected at an appropriate frequency throughout the day.

• All efforts should be made to maintain 2m physical distancing wherever possible. Hospitality businesses, are permitted to move to 1 metre distancing, when open, but only where additional risk mitigation measures are in place. It is also important to understand how requirements for customers to wear face coverings applies to your business. Further guidance on the use of face coverings can be found here.

Additional measures for customer areas in takeaway/food to go businesses

• Customers should be reminded of the need to wear a face covering whilst collecting their orders within the premises. In businesses offering both take-away and table service, face coverings should only be removed in designated seating areas which are provided for customers to eat and drink.

• Ask customers to order online, using apps or over the telephone to reduce queues and manage collection/pick-up times. Encourage contactless payments wherever possible. Where queuing is unavoidable for food collection, put staff in place to manage queuing systems and erect barriers where appropriate to ensure they do not present a health and safety or security risk to your own or other businesses.

• Collection times should be staggered to discourage crowding outside the premises. If possible, designate a customer waiting area where a 2m distance from other people can be maintained.

• Take steps to minimise opportunities for kitchen staff to come into contact with front of house serving staff and delivery drivers for instance by designating points for serving and collecting food items.

• 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.

• Provide single use, individually wrapped condiments rather than shared bottles on counter tops for customer use.
• 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. Although not a legal requirement outdoors, encourage customers to also wear a face covering when queuing and collecting takeaway orders (e.g. through signage).

Additional measures for customer areas in food retail businesses

FBOs in the food retail sector should refer to Scottish Government’s guidance on COVID-19 for the retail sector. Useful guidance for this sector has also been produced by the British Retail Consortium. General considerations for distancing apply to customer areas in food retail establishments but these businesses should also have particular regard to the following:

• The requirement to implement two metres physical distancing and the mandatory wearing of face coverings by customers and staff. Food retailers are strongly advised to consult the relevant section of Scottish Government’s guidance on COVID-19 for the retail sector to assess how this requirement applies to their business. It is also necessary to consider whether any exceptions to this requirement might apply for example for particular staff handling food where the wearing of a face covering could compromise effective food safety management (see section 5).

• Depending on the specific setting, additional mitigations at food retail will include:
  - Effective queue management systems to limit the number of customers in the premises at any one time.
  - One-way systems which allow staff and customers to move through the premises maintaining physical distancing.
  - Staggering arrival and departure times of staff.
  - Implementing contactless payment systems.
  - Signage and tannoy announcements to remind customers and staff of the need to distance and wear face coverings.
  - Hand sanitation facilities at entry and exit points and common areas.
  - Screens to create a physical barrier between people, for example at till points.

• For food retail deliveries, ensure delivery drivers adhere to physical distancing and hygiene requirements both on the premises (including pick-up/distribution areas), and when they are delivering food to customers. It is particularly important for delivery drivers to wear face coverings in indoor communal areas (e.g. stairwell of a block of flats) where physical distancing can present a challenge. In such circumstances consideration should also be given to arranging pick up points with customers to reduce the risk of contact.

Additional measures for customer areas in pubs and restaurants

When permitted to open, FBOs in the pub and restaurant trade should refer to Scottish Government’s guidance on COVID-19 for the Tourism and Hospitality Sector. Useful guidance for this sector has also been produced by UK Hospitality. These businesses should give particular consideration to the following when permitted to be open:
The wearing of face coverings is mandatory in indoor hospitality venues for staff and customers when not eating and drinking (e.g. when entering and moving around a venue). Whilst it is not compulsory to wear a face covering outdoors it is recommended in crowded situations where physical distancing is not always possible. Staff in non-public facing roles, such as kitchen staff, are exempt from wearing face coverings where this may present health and safety issues, and where physical distancing can be achieved.

Implement plans and procedures for bar and table service which ensure there is 2m physical distancing between each table (or 1m with additional mitigation measures) with adequate space to enable front of house staff to maintain the required distance from customers. Pubs and restaurants considering whether to move to 1m distancing, across any area of their premises, are required to undertake a risk assessment to identify additional mitigation measures that will be required to minimise the risks of spreading COVID-19.

It is essential that clear signage is displayed at entry points and throughout the premises to inform customers that they are within a 1 metre physical distancing zone and, most importantly, that everyone is reminded to observe the requirement to remain at least 1 metre from the next person, unless from the same household or a carer.

Depending on the specific setting, additional mitigation measures in pubs and restaurants will include:

- The use of screening (e.g. perspex dividers) to partition tables and service/payment areas.
- Introduction of table service only systems (i.e. no standing) to prevent customers from gathering at bar areas.
- Back-to-back seating arrangements for different groups of customers.
- Enhanced ventilation throughout the premises.
- Enhanced cleaning arrangements (with documentation).
- Measures for reducing customer flow through corridors and service areas.
- Measures to reduce noise and restrictions on music volume (to ensure customers and staff don’t need to communicate with raised voices).
- Compliance with Test & Protect protocols and taking contact details for all customers/visitors for contact-tracing purposes (see section 8). Note that each customer/visitor is now required to give details.

Reduce opportunities for surface contamination at common touch points by keeping tables clear, delivering cutlery and individually wrapped condiments only when meals are served. Limit customer contact with menus by 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.

Restrict unnecessary movement of customers within service areas, for example by ensuring they are discouraged from returning empty glasses and crockery by waiting staff or through the use of clearly displayed signage.

FBOs should be aware that Local Authorities now have enforcement power 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.
4. 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.

- Identify key touch points (including switches, door handles, grab-rails in corridors, stairwells, keypads, vending machines, etc) and ensure these are being cleaned and disinfected at frequent intervals. 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 (see below).

- 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.

Guidance on cleaning and disinfection for COVID-19 control in non-healthcare settings has also been published by Public Health England, Health Protection Scotland, and The European Centre for Disease Prevention and Control. The Society of Food Hygiene and Technology has also produced a Guide to Cleaning And Disinfection Regime With Regard To novel Coronavirus, and additional information on specific cleaning and disinfection measures for COVID-19 can also be found in the 23 March 2020 Edition of Chemical and Engineering News.

The Global Food Safety Initiative has also 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.

5. 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.

HPS and Public Health England advise that the use of additional PPE specifically for COVID-19 should only be required in settings where there is a higher level of contamination risk through respiratory secretions from potentially infected individuals (i.e. healthcare). In light of existing Fitness to Work measures and current restrictions this is unlikely to be a scenario that will routinely be encountered by food businesses as all symptomatic individuals should be self-isolating in accordance with Government guidance. Based on current evidence and advice, it should not be necessary for businesses to implement additional PPE as a standard requirement for preventing the spread of COVID-19.

Robust hygiene measures, coupled with physical distancing, continue to be the most important measures for FBOs to apply for preventing the spread of COVID-19. It is acknowledged that there may be specific defined tasks within a food business where physical distancing presents a particular challenge, and it may be deemed appropriate to take additional precautions. These may include the use of face masks, visors, gloves or other PPE such as is used in high care/risk
food manufacture. However, widespread use of additional PPE should never be considered as an acceptable alternative to physical distancing and personal hygiene such as handwashing.

- It has been recognised in guidance published by the World Health Organisation (WHO) that PPE such as masks and gloves can have a role to play in reducing the spread of infection in the food industry, but only if they are used properly and in appropriate situations. It is important that FBOs and staff understand the difference between face masks and face coverings. Where public health guidance refers to face masks this usually means surgical or other medical grade masks that are used in certain health and social care situations. Face coverings are made from cloth or other textiles that cover the mouth and nose, and through which you can breathe (e.g. a scarf). Everyone needs to be aware of and follow Scottish Government guidance on face coverings. This can be found on the Scottish Government website.

- 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 masks**

- Certain high care food manufacturing environments already require the wearing of surgical/medical grade face masks as part of standard H&S and FSMS procedures. In circumstances where this is not the case, and FBOs are considering the introduction of face masks into their standard issue PPE, it is important to take account of the following:

  - Health Protection Scotland advises that surgical/medical grade face masks should not be required outside of clinical and care settings, as the evidence for their effectiveness against the spread of COVID-19 in non-healthcare workplaces is not proven.
  
  - Face masks carry their own training, usage and disposal requirements to minimise the risk of them becoming a source of contamination. Staff who are not accustomed to wearing face masks may be less likely to:
    - Ensure they are fitted and worn properly.
    - Change them at regular intervals.
    - Handle and dispose of them hygienically.
    - Apply effective risk reduction measures such as handwashing.

  - Ill-fitting face masks and the build-up of condensation can cause the wearer discomfort, increasing the likelihood that they will touch their face, or alter the mask increasing the potential for spreading infection. Condensation is likely to be a particular risk in cold working environments.

  - Supplies of surgical face masks must continue to be reserved for those who need them to protect against risks in their workplace, such as health and care workers.

**Face coverings**

- The general population are advised to wear face coverings as a precautionary measure for controlling the spread of COVID-19. The key function of wearing a face covering is to
**Protect others around you from infection.** This is important, especially if you have no symptoms and may not know you are infected. There is evidence that cloth face coverings will reduce the dispersion of the virus into the air from an infected person so will protect others if the wearer is carrying the virus. They may also provide a small amount of protection for the wearer although this is not their primary purpose.

- It is important not to confuse the cloth/fabric face coverings recommended for the general public with the surgical/medical grade face masks that are used in clinical and certain high care food production settings. **Fabric face coverings are not classed as PPE.** Unlike surgical/medical grade and respiratory masks they are not manufactured to a recognised standard. There is no requirement for face coverings to meet specific levels of filtration efficiency and breathability. The British Retail Consortium released a [specification for the manufacture of Textile Barrier Face Coverings](https://www.britishretailconsortium.org.uk) designed for both disposable and reusable face coverings. The specification sets out the design, performance and chemical requirements of coverings, as well as labelling instructions, but does not include tests for filtration efficiency. [Further guidance on the use of face masks and coverings in the workplace can be found on the HSE website.](https://www.hse.gov.uk/coronavirus/index.htm)

- **The wearing of face coverings is mandatory in certain indoor public spaces,** when permitted to be open, including retail premises, hospitality settings, takeaways and cafes, including workplace canteens (please refer to [Scottish Government local protection levels](https://www.gov.scot/coronavirus-virus/scottish-government-local-protection-levels/)). Additionally, it is a legal requirement for all staff to wear a face covering in 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 2 metres. However, people can wear a face covering in these situations if they want to. **All FBOs, regardless of the business, should ensure that their staff understand the situations where face coverings are required to be worn by law.**

- During food production and handling tasks, face coverings may also be considered as an additional risk mitigation measure for staff when physical distancing presents a challenge. In these circumstances, the suitability of face coverings will depend on the nature of the task involved. FBOs should give careful consideration to the wearing of any type of face covering by staff during food production and handling tasks, as inappropriate use could present a risk to food hygiene and safety. When deciding whether to introduce the wearing of face coverings or masks by staff while they are handling food, it is strongly recommended that FBOs undertake a risk assessment to determine if they are 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. **All workplaces should also have appropriate disposal and cleaning facilities available for staff to use following removal of a face covering.**

- Physical distancing and hygiene remain the most important controls for preventing the spread of COVID-19. However, employers should support all staff who choose to wear a face covering in the workplace, providing they can be worn without compromising food safety management, and that training is provided to ensure they are worn and handled hygienically and are changed regularly.

- There are situations where some people are unable to, or it would be inappropriate for them, to wear a face covering (further detail on the [face covering exemptions page](https://www.foodstandards.gov.scot/food-safety/fsa-support/coronavirus-faq1/face-covering-exemptions-page)). Written proof of an exemption is not required, however some people may feel more comfortable showing something that says they are exempt from wearing a face covering. A face covering exemption card can be requested on 0800 121 6240 or through the [exemption card website](https://www.foodstandards.gov.scot/food-safety/fsa-support/coronavirus-faq1/exemption-card-page).
Face visors/shields

- 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, including physical distancing, using fixed teams and partnering for close-up work, and increasing hand and surface washing. These other measures remain the best ways of managing risk in the workplace and FBOs should not rely on the use of visors as a control for preventing the spread of COVID-19.

- 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 trained to ensure any type of face covering is fitted and worn correctly and hygienically.

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

- 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.

- If anyone is made aware of anyone displaying symptoms of COVID-19 in the workplace (a new, continuous cough or a high temperature or a loss of or change in sense of smell or taste), immediate action should be taken to remove them to a pre-arranged isolation room, until they can be sent home. Where possible they should minimise contact with others, and use a private vehicle to travel home. If it is not possible to use private transport, then they should be advised to return home quickly and directly, wearing a face covering if possible. They should be advised to follow the stay at home guidance.

- If a member of staff has helped someone who was taken unwell with a new, continuous cough or a high temperature or a loss of or change in sense of smell or taste, they do not need to go home unless they develop symptoms themselves. They should wash their hands thoroughly for 20 seconds after any contact with someone who is unwell with symptoms consistent with coronavirus infection.

- 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 HPS's Guidance on COVID-19 for non-healthcare settings.

7. Ensuring employees understand what they need to do if they develop symptoms

- 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.**

- 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. 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.

- 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.**
8. Understanding your role in Scotland’s Test and Protect strategy

- Test and Protect, Scotland’s approach to implementing the ‘test, trace, isolate, support’ strategy is a public health measure designed to break chains of transmission of COVID-19 in the community. The NHS will test people who have symptoms, trace people who may have become infected by spending time in close contact with someone who tests positive, and then support those close contacts to self-isolate. That means if they have the virus they are less likely to pass it on to others.

- 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. If a member of staff becomes unwell, they should leave work to self-isolate straight away and, if possible, wear a face covering on route and avoid public transport.

- FBOs must also ensure that staff follow advice to self-isolate if they are living with a person who has symptoms or has tested positive, or they have been informed by an NHS contact tracer that they have been in close contact with someone who has tested positive. Employees can request an isolation note through NHS Inform.

- All staff reporting symptoms of COVID-19 should also be encouraged to arrange a test as soon as possible through NHS Inform. FBOs must ensure staff are fully supported when they are required to self-isolate. Until staff have been tested and told if it is safe to leave home, employers should make sure that staff are not placed under any obligation to return to the workplace.

- Staff who have tested positive for the virus will need to self-isolate for a minimum of 10 days. 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. Where Infection Prevention Control measures have been utilised such as protective screen or use of PPE the contact tracer will conduct a risk assessment to identify contacts at risk. The priority of the Test and Protect Strategy is to protect public health by breaking the chain of transmission of COVID-19.

- If staff are informed by a contact tracer that they should isolate, FBOs should help them to do so straight away. They may feel well, as the virus could still be incubating when they are asked to isolate. Some people who are asked to isolate may not become unwell, but they must stay at home and self-isolate for the full 10 days. FBOs can ask them to work from home if they are able to and they are not unwell, but should not, in any circumstances, ask someone isolating to come into work before their period of isolation is complete.

- 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 contact 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.

- The **Protect Scotland Contact Tracing App** is an entirely voluntary app that is an additional part of NHS Scotland’s Test & Protect service. Having the app should not be considered a requirement for the workforce, and is intended to complement, rather than replace manual contact tracing. It enhances contact tracing by quickly alerting app users that they have come into close contact (less than 2m for 15 minutes or more) with an app user that has since tested positive for COVID-19, and therefore may be at risk of infection. [Further information about the contact tracing app](#) for employers, workers and customers is available.

9. 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 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.

10. 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.

- 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.

Version History

<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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<tr>
<td>1.1</td>
<td>09/04/2020</td>
<td>- Clarification of questions</td>
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<td>- Clarification of cleaning and disinfection procedures</td>
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<td></td>
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<td>- Clarification on the use of PPE to reflect current government advice that face masks not recommended outwith healthcare settings</td>
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<tr>
<td>1.2</td>
<td>29/05/2020</td>
<td>- Links to the Scottish Government Route Map (Phase 1) and sectoral guidance for easing lockdown.</td>
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<td>- Extension of scope to cover food business re-start</td>
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<td></td>
<td>- Clarification of cleaning and disinfection procedures</td>
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<tr>
<td></td>
<td></td>
<td>- Updating of social distancing procedures to align with government advice</td>
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<tr>
<td></td>
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<td>- Clarification on the use of face masks and face coverings in light of government advice.</td>
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<td>Date</td>
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| 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. |
| 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. |
| 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 |
| 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 |
| 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 |
| 31/08/2020 | Updating of advice relating to individuals who were shielding and those at increased risk of infection.  
                             | Addition of extra questions.  
                             | Removal of dates regarding implementation of mandatory wearing of face coverings.  
                             | Addition of increased cleaning as an additional mitigation measure for hospitality businesses moving from 2m to 1m distancing.  
                             | Addition of link to Q&A for hospitality businesses on REHIS website.  
                             | Addition of text highlighting mandatory requirements for the hospitality sector to collect customer information. |
| 21/09/2020 | Addition and updating of text to highlight the introduction of mandatory wearing of face masks by customers and staff in indoor hospitality venues. |
| 24/09/2020 | Addition of advice regarding temperature checking staff as an unsuitable means of testing for COVID-19.  
                             | Addition of information on the Test and Protect- Contact Tracing App. |
| 08/10/2020 | Addition of mandatory wearing of face coverings in indoor communal areas in workplaces.  
                             | Reinstigation of advised 2m physical distancing in retail.  
<pre><code>                         | Link to MHRA evidence on the unsuitability of temperature checking of staff for COVID-19. |
</code></pre>
<p>| 09/10/2020 | Clarification on the status of requirements on face covering in indoor communal areas, following the First Minister’s statement on 7 October 2020. |
| 19/10/2020 | Addition of mandatory wearing of face coverings in workplace canteens and indoor communal areas. Regulatory details and dates added. |</p>
<table>
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<tr>
<th>Date</th>
<th>1.14 30/10/2020</th>
<th>1.15 07/12/2020</th>
<th>1.16 14/12/2020</th>
<th>1.17 08/01/2021</th>
<th>1.18 19/01/2021</th>
<th>1.19 15/03/2021</th>
<th>1.20 26/04/2021</th>
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<tr>
<td>1.14</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>
<td>Inclusion of cohorting principles.</td>
<td>Update of self-isolation period to 10 days from 14 days.</td>
<td>Inclusion of cohorting principles.</td>
<td>Amendment of section on employees who are in the shielding category (Section 1B).</td>
<td>Updating of language used, to ensure all text is in line with current COVID-19 situation.</td>
<td>Enhanced focus on improved ventilation across all areas of the workforce.</td>
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<td>30/10/2020</td>
<td>Change to Shielding advice in line with Strategic Framework</td>
<td>Addition of precautionary measures for delivery drivers of food retail.</td>
<td>Amendment of section on employees who are in the shielding category (Section 1B).</td>
<td>Removal and editing of various out of date hyperlinks.</td>
<td>Insertion of section on vaccination along with links to additional information.</td>
<td>Insertion of updated Scottish Government Strategic Framework link.</td>
<td>Insertion of ventilation advice card.</td>
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<td>1.15</td>
<td>Editing section 3 titles to include additional COVID-19 control measures, alongside physical distancing.</td>
<td>Addition of face covering exemption card details and where to obtain one.</td>
<td>Amendment of section on employees who are in the shielding category (Section 1B).</td>
<td>Addition of Scottish Government workers’ accommodation guidance and transport guidance.</td>
<td>Summary blue box text changes to reflect importance of FACTS across all businesses.</td>
<td>Insertion of section on vaccination along with links to additional information.</td>
<td>Deletion of non-indoor entry restrictions for takeaway establishments in level 4 lockdown areas.</td>
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<td>07/12/2020</td>
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<td>Insertion of details and link to FSS self-assessment audit tools.</td>
<td></td>
<td>Addition of Scottish Government ventilation guidance.</td>
<td>Shielding section updated text, highlighting where all up to date information can be found.</td>
<td>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.</td>
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