COVID-19 – Guidance for Food Business Operators and Their Employees

In these challenging times, 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. Whilst there is currently no evidence that food is a source of the virus, it is more important than ever for food businesses to implement effective Food Safety Management Systems (FSMS), including the application of frequent and thorough hygiene practice.

Physical (social) distancing also plays a critical role in preventing the spread of COVID-19 in food manufacturing and processing environments, and both managers and staff should ensure this is adhered to wherever possible in order to prevent the spread of the virus.

Effective FSMS which includes good hygiene practice and Hazard Analysis and Critical Control Point (HACCP) processes plays a vital part in controlling microbiological risks in food production and manufacturing environments. However, at this time, food businesses operators should also be placing emphasis on infection prevention and control measures to prevent the spread of COVID-19.

Many food businesses have enhanced their existing hygiene controls and implemented additional measures to ensure that they are doing all in their power to protect their staff from COVID-19. This guidance aims to provide further support by outlining ways that physical (social) distancing can be applied in food manufacturing and processing premises, as well as other mitigation measures that can be implemented by these businesses to enable them to adhere to government advice for preventing the spread of COVID-19. Food Business Operators should refer to this document when considering COVID-19 prevention and control measures that are required for their own operations.

This guidance has been developed to supplement generic guidance for consumers and food businesses which has been published by Food Standards Scotland and on the Gov.uk website. It intends to translate Scottish Government guidance on ‘Coronavirus (COVID-19): business and social distancing guidance’ and the advice published by Health Protection Scotland for Non-Healthcare settings for application in food manufacturing settings. This guidance also takes account of guidelines produced by the food industry on practical ways to provide a safe working environment at this time.

Before using this guidance it is important for all food business operators to assess the extent to which their existing FSMS, health and safety procedures and infection prevention and control measures will mitigate the risks associated with COVID-19. The following questionnaire will support managers in identifying where there is a need to strengthen their existing controls, and areas where they will need to implement any of the additional measures outlined in this guidance.
QUESTIONNAIRE FOR ASSESSING THE NEED FOR ADDITIONAL MEASURES AT FOOD BUSINESSES TO PREVENT THE SPREAD OF COVID-19

All food business operators should ask themselves the following questions to assess their ability to implement requirements for preventing the spread of COVID-19 in their premises and protect their staff from infection.

It should be noted that food business operators 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 consider the need to cease production and close their facility until which time the Government advises that physical (social) distancing requirements can be relaxed.

1. Have you reviewed your existing Food Safety Management System (FSMS), Health and Safety, and Infection Prevention and Control Procedures against Government advice on hygiene and physical (social) distancing requirements for preventing the spread of COVID-19?

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 accommodate the requirements for implementing robust hand hygiene measures through the provision of hot water, suitable soap, paper towels and hand sanitiser at every entrance and exit to food production/work 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 the requirements for additional cleaning and disinfection been met?

6. To what extent are you able to implement the requirements relating to physical (social) distancing – ensuring a distance of two meters between people - across all areas of your business including on-site, food production lines and communal areas?

7. Are you able to support all office staff in working from home?

8. Are you able to reduce the opportunity for staff to congregate in communal areas such as canteens, clocking-in areas, staff rooms, wash areas and corridors?
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9. 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, constructing panels between workers?

10. Are you able to undertake training which will ensure that all employees understand the requirements for maintaining physical (social) distancing and are you able to put measures in place to monitor adherence by all staff?

11. Are you able to take appropriate measures to minimise external visitors to the premises and to ensure any essential visitors (delivery drivers/maintenance crews/cleaning personnel etc.) are screened to ensure they do not present a risk of spreading COVID-19 to staff?

12. Do you have measures in place to minimise contact between essential visitors to your site and your employees?

13. Are you able to implement procedures for monitoring the health of your staff in relation to COVID-19?

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

15. Are you staying up to date with the guidance published by Scottish and UK Government including:

- COVID-19 Information and Guidance for non-healthcare settings published by Health Protection Scotland
- Guidance for employers and businesses on coronavirus (COVID-19)’
- Scottish Government COVID-19 guidance on social distancing for businesses
- Scottish Government: general guidance on coronavirus
- NHS Inform
- Gov.uk Coronavirus – What you need to know
- Food Standards Scotland web-page on coronavirus and food

Other useful references are provided throughout this document.

16. Are you able to provide evidence that all of the required measures are being implemented and monitored in addition to your existing Food Safety Management System (FSMS), Health and Safety, and Infection Prevention and Control Procedures?

Given the concerns of staff and unions, positive answers to these questions should provide a level of assurance to your staff on any concerns they have regarding the potential risk of being exposed to COVID-19 in the workplace. You may therefore wish to consider how these questions and your responses could be used to support communications to staff.
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STEPS THAT NEED TO BE TAKEN BY ALL FOOD BUSINESSES TO PREVENT THE SPREAD OF COVID-19

RAISING AWARENESS

- It is essential for managers to emphasise the importance of maintaining an effective Food Safety Management System (FSMS) and, in particular, the role of thorough and frequent handwashing in preventing the spread of COVID-19. Measures for implementing social distancing should also be effectively communicated across the site. Posters, leaflets and other materials are available online which can be used to reinforce these messages throughout the workplace.

- Managers also need to provide all personnel with clear instructions of what to do in relation to COVID-19 – 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.

PROMOTING EFFECTIVE PERSONAL HYGIENE

- Ensure all staff are trained in effective handwashing technique - to wash hands for the required 20 seconds with soap and water – and that the importance of thorough and frequent handwashing is reinforced throughout the site.

- Provide hand sanitiser and tissues as well as access to hot water, suitable soap and paper towels at every entrance and exit to food production or work areas.

- Ensure that all staff undertake effective handwashing every time:
  - Upon entry and exit to the food production area, and at regular intervals during manufacture/processing.
  - 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 at key points and at regular intervals on the production lines.
IMPLEMENTING EFFECTIVE CLEANING AND DISINFECTION

- Increase cleaning schedules at workstations, and ensure all public areas are cleaned down regularly, every two hours where possible.

- Identify key touch points (including door handles, grab-rails in corridors, stairwells, keypads, vending machines, etc) and ensure these are being cleaned and disinfected regularly—at least every 2 hours. Using a disposable cloth, first clean hard surfaces with warm soapy water then disinfect these surfaces with the cleaning products you normally use.

- Ensure 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.

- It’s important to check with your suppliers that your cleaning and sanitising chemicals are certified as effective against enveloped viruses such as coronavirus. Products bearing the EN 14476:2013 standard should have been tested for efficacy against certain coronaviruses (although not specifically the virus responsible for COVID-19).

- Although there is a lack of data on the specific effects of disinfectants against the COVID-19 coronavirus, the evidence shows that similar viruses can be deactivated using many Quaternary ammonium products, which are commonly used in the food industry.

- Household bleach and other potent oxidisers are also known to kill similar viruses and can be effective for up to 24 hours. When using bleach as part of your cleaning and disinfection routine, current recommendations are to use either:
  - a combined detergent disinfectant solution at a dilution of 1,000 parts per million available chlorine (ppm av.cl.)
  - a household detergent followed by disinfection (1000 ppm av.cl.).
  - refresh your bleach solution after every 24 hours to ensure it stays effective

- Always follow manufacturer’s instructions for dilution, application and contact times for all detergents and disinfectants. **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 s to 10 min. It’s important to follow instructions as wiping them off too soon might clean the surface without properly disinfecting it.
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- Wherever possible, wear disposable or washing up gloves and aprons for cleaning. These should be double bagged, stored securely for up to 72 hours then thrown away in the regular rubbish after cleaning is finished.

- 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. In these cases disinfectant or alcohol (70%) wipes are more suitable.

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

- Further guidance on cleaning and disinfection in non-healthcare settings has been published by Public Health England, and The European Centre for Disease Prevention and Control. The 23 March 2020 Edition of Chemical and Engineering News also includes a useful article on disinfectants which should kill the COVID-19 coronavirus.

ENSURING PHYSICAL (SOCIAL) DISTANCING MEASURES ON SITE

- Implement home working for as many office staff as possible and promote the use of teleconference for meetings, even between people in the same building.

- Consider the need to review current arrangements for those staff who need to travel to work. For example businesses which currently offer staff transport may need to re-schedule trips or offer an enhanced service to facilitate appropriate physical (social) distancing. In light of the requirements, managers should also discuss with staff the need to review other travel arrangements such as car sharing. Further advice on physical (social) distancing in relation to travelling to and from the workplace is to be included in the guidance produced by Health Protection Scotland.

- 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, re-design workflow 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 fire doors open to reduce the need for hand contact.

- Non-essential visits from external parties should be prohibited wherever possible. It should be noted that enforcement officials such as Environmental Health Officers, Official Veterinarians and Meat Hygiene Inspectors are considered essential visitors and will follow the strict site protocols as necessary.
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- Ensure all essential visitors to the site are aware of the Government guidelines and adhere to company protocols. Essential visitors such as delivery drivers should be required to complete a declaration which specifically refers to absence of COVID-19 symptoms (a high temperature (fever) and new, continuous cough). If possible, this should be provided electronically, 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 should not be allowed on site.

- In circumstances where essential visitors are required to spend time on site, take appropriate measures to separate them from employees wherever possible. Ensure the 2m physical (social) 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 clocking in 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, or ‘keep left’ flows to minimise contact, confusion and reduce time spent in confined areas.

ENSURING PHYSICAL (SOCIAL) DISTANCING MEASURES IN FOOD PRODUCTION AREAS

- Wherever possible, increase physical space between employees by rearranging workspaces, and consider the possibility of changing to a shift working pattern that will increase distance between staff. Reduced staffing levels will have an impact on productivity but this may be necessary to protect staff and maintain output.

- Where production lines don’t allow for this, additional measures must be implemented to allow appropriate distancing, such as the following:
  - Running the line slower, for longer.
  - Constructing physical barriers for example through the use of cleanable Perspex panels between workstations (ensuring these are cleaned regularly throughout shifts).
  - Keeping workers on same production lines or working in the same areas of the premises each day.
  - Ensuring that when lines stop during production there are measures for preventing staff from congregating in groups.
  - Marking physical distancing spaces on the production floor so they are clearly identifiable.
  - Moving certain tasks to different locations where practical.
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- Maintaining 2m distancing in wash areas particularly at the end of break times where there is more risk of congestion and air moisture content is higher than normal.
- Staggering break times for staff to reduce congestion in communal areas (see below).

ENSURING PHYSICAL (SOCIAL) DISTANCING MEASURES IN COMMUNAL AREAS

- Communal areas such as staff rooms, changing areas, and smoking areas provide a key opportunity for personnel to congregate and invade physical (social) distancing. Where possible, provide additional space to allow personnel to spread out more.

- If it is not possible to provide additional communal space, develop a rota system for staggering breaks to control the number of people using communal spaces and corridors at any one time. Also consider allowing workers longer break times in order to allow them to reach their break area to avoid crowding.

- **Scottish Government guidance on Business and Social Distancing** has identified workplace canteens as non-essential businesses which should remain closed **unless** there are no practical alternatives for providing food to staff and/or provide a space for breaks. Where it is considered necessary to keep on-site canteens open, catering teams should be encouraged to move to a take away system, and these areas organised so that social distancing is possible. If this is not possible, then staff should be encouraged to bring their own food and use their cars for breaks (ensuring appropriate distancing from colleagues) or be provided access to other areas where physical (social) distancing can be observed, for example offices which are not in use.

- Any on site retail establishment should put controls in place that ensure all staff adhere to social distancing requirements i.e. are kept 2m apart.

ENSURING APPROPRIATE USE OF PERSONAL PROTECTIVE EQUIPMENT (PPE)

- Personal Protective Equipment (PPE) must continue to be worn as required, in line with the existing health and safety and first aid requirements of the food business.

- However, HPS recommends 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. In light of current restrictions this is unlikely to be a scenario that will be encountered at any food production setting, as all symptomatic individuals will be self-isolating in accordance with Government guidance. **Therefore additional PPE should not be a requirement for any food businesses at this time.**
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ACTING QUICKLY WHEN A MEMBER OF STAFF DISPAYS SYMPTOMS OF COVID-19

- Staff should know that anyone experiencing symptoms should self-isolate immediately. They should then be sent home in personal transport if available.

- If anyone is made aware of anyone displaying symptoms of COVID-19 (a new, continuous cough or a high temperature), immediate action should be taken to remove them to a pre-arranged isolation room, until they can be sent home. They should be advised to follow the stay at home guidance. If they need clinical advice, they should go online to NHS 111 or call 111 if they don't have internet access. In an emergency, call 999 if they are seriously ill or injured or their life is at risk. Do not visit the GP, pharmacy, urgent care centre or a hospital.

- If a member of staff has helped someone who was taken unwell with a new, continuous cough or a high temperature, 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.

- If anyone has self-isolated and they are returning to work, they must have self-isolated for 7 days from when the symptoms started. If they have been in contact with anyone with symptoms, they must self-isolate for 14 days. This should be communicated to staff, checked and verified as part of the return to work procedures.

STAYING INFORMED

- This is a fluid situation and the official guidance from Scottish Government, Health Protection Scotland, NHS Inform, Gov.uk and the Food Standards Scotland website changes frequently. Make sure you keep yourself and staff on site up to date by regularly referring to the resources referenced throughout this document.

- 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.