COVID-19:
Risk assessment tool for food business operations

On 21 May 2020, The First Minister launched a route-map for easing COVID-19 restrictions in Scotland. The route-map provides a phased framework for decision making regarding the easing of lockdown measures, with criteria for re-opening businesses, including those in the food and drink sector. This risk assessment tool is intended for use by food business operators (FBOs) planning to re-start their food production and/or service operations as restrictions are eased in accordance with the route-map and the introduction of Coronavirus (COVID-19): Scotland's Strategic Framework approach to outbreak management based on five levels of protection. It will also assist those which are already operating, in identifying, reviewing and maintaining the changes they will need to make to prevent the spread of COVID-19 across their operations.

The food businesses covered by this risk assessment tool include:
- Food manufacturers, processors, retailers and take-away establishments which have been permitted to remain open since lockdown.
- Food to Go/Quick Service Retail establishments (including takeaway, delivery and drive through).
- Hospitality (indoor and outdoor spaces in pubs and restaurants) subject to physical distancing rules and public health advice.

Physical distancing requirements applicable to food businesses (as of 19 October 2020):

> **PHYSICAL DISTANCING**
>
> **2 metres is the default physical distancing rule, and this should continue to be applied by all food businesses including food retail establishments.**
>
> **Exceptions to the 2 metre rule can only be applied in hospitality businesses (pubs and restaurants), and only where additional risk mitigation measures are in place.**
>
> **All other food businesses covered by this guidance are required to apply 2 metre distancing wherever possible throughout the workplace.**
>
> **FACE COVERINGS**
>
> **The wearing of face coverings is mandatory for customers in food retail and take-away establishments. Customer facing staff in these businesses are also required to wear face coverings where it is not possible to maintain 2 metre distancing, and no other measures are in place to ensure physical separation (e.g. through the use of screening).**
>
> **The wearing of face coverings is also mandatory in indoor hospitality venues for staff and customers when not eating and drinking (e.g. when entering and moving around a venue). Staff in non-public facing roles, such as kitchen staff, are exempt from wearing face coverings where this may present health and safety issues.**
>
> **There is now a mandatory requirement for face coverings in workplace canteens, when not seated at a table, and also in indoor communal settings, such as corridors and staff rooms, where it is not possible to maintain 2 metre distancing.**
>
> **Detailed guidance and legislation on the mandatory wearing of face coverings has been produced by the Scottish Government.**

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FSS will continue to update this tool in line with Scottish Government's review of lockdown restrictions, and the introduction of the Strategic Framework levels approach, as well as emerging evidence and changes to public health advice.

The tool should be used by all of these FBOs to document the measures they have taken to prevent the person-to-person spread of COVID-19, and provide evidence that they are maintaining these measures on an on-going basis to ensure their staff and customers are protected from the risks of infection.

The most important actions you can take for preventing the spread of COVID-19 are to ensure physical distancing between staff, customers and other visitors, and to strengthen hygiene practices including hand washing and cleaning and disinfection across all areas of your business. For many FBOs, this will involve making changes to workflow and procedures, and it is critical to ensure that these do not compromise food safety, and that you are able to maintain compliance with food law requirements.

Similar to your Food Safety Management System (FSMS), the measures you will need to take, and the documentation for recording these measures, should be commensurate with the nature and size of your food business. It is therefore important to read through this risk assessment to identify the particular questions that are applicable to your own circumstances, and use these to develop your own COVID-19 Safety Plan.

You should prepare your risk assessment with reference to [the COVID-19 guidance produced by Food Standards Scotland,](#) as well as [Scottish Government's sector guidance for easing lockdown.](#) It is important to provide as much information as possible against each of the questions that apply to your business, in order that it can be used as evidence to demonstrate to your staff, as well as trade unions, local authorities and government officials authorised to conduct interventions, that you have:

- Considered the potential COVID-19 risks associated with your business
- Taken appropriate mitigation measures to prevent the spread of COVID-19 and
- Considered any impacts on your ability to ensure the safety and standards of your products.

As the COVID-19 pandemic is an evolving situation, it will be important to review your risk assessment and Food Safety Management systems (FSMS) regularly and make changes as appropriate, to take account of any changes to your own circumstances, as well as new government advice and scientific evidence.

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Before completing this risk assessment, it is important that you familiarise yourself with the relevant guidance that has been published by:

- [Food Standards Scotland (COVID-19 guidance for food business operators and their employees)](),
- [Scottish Government Sector Guidance for Easing Lockdown]()
- [Health Protection Scotland (COVID-19 guidance for all non-healthcare settings)](),
- [NHS Inform (General Healthcare Advice)]()
- [Scottish Government (links to guidance on all aspects of COVID-19)]()
- [Health and Safety Executive: Working Safely during the COVID-19 Outbreak]()
- [Health and Safety Executive: What to include in your COVID-19 Risk Assessment]()

Similar guidance has been produced by UK Government:

- [Food Standards Agency Guidance on hygiene and food safety requirements for food businesses to reopen and operate safely during COVID-19.]()
- [UK Cabinet Office (Gov.uk guidance for food businesses on COVID-19)]()
- [Gov.uk (Department for Business, Energy and Industrial Strategy) Sectoral Guidance on Working Safely during Coronavirus]()

It is also important that you notify your Local Authority Environmental Health department of your intention to re-start and ask them for specific advice on food safety management and infection prevention and control measures that are relevant to your food production system, premises and workforce.

Documenting your procedures

It is recommended that FBOs ensure their managers maintain a record that they have developed a COVID-19 Safety Plan in accordance with this risk assessment and the most up to date government guidance, and that this has been reviewed by an appropriate representative of their workforce. This document includes a table which can be signed off by managers and employee representatives to demonstrate that appropriate measures for preventing the spread of COVID-19 have been reviewed and addressed through consultation between both parties.

FSS has also produced a summarised [checklist]() which will support managers in engaging with staff on the key measures needed to control the risks of COVID-19 and maintain food safety management during this challenging period.

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Risk assessment tool for re-starting your food business to ensure food safety and prevent the spread of COVID-19

What you need to assess	What will you do?	Who is responsible?	Evidence needed to demonstrate this has been addressed.	How will you verify that these procedures are being carried out?
Planning and preparation				
1. Have you identified all of the areas of your business that will need to be reviewed in order to assess the risks of restarting during COVID-19?	**Identify the questions in this risk assessment that apply to your specific circumstances to prepare your own risk assessment** **Points to consider:** The nature of your business, lay-out of premises, staffing levels, methods for communicating with staff, shift patterns, workflow, visitors to site, contact with customers, training programmes.	All staff who need to be consulted in such a review.	**Examples:** risk assessment relevant to the business, checklists, written procedures.	**Examples:** regular review to ensure that appropriate measures are implemented at all areas identified.
2. Are there particular maintenance issues and food safety management considerations that will need to be addressed before re-starting food production and/or service? Also refer to risk assessment tool produced by HSE	**Points to consider:** Pre-requisites such as ventilation and pest control, the need for changes to workflow, communal areas, staff numbers, staff interactions with each other and customers, rotas, speed of production, cleaning and disinfection procedures, hand hygiene requirements. The need for additional cleaning measures for premises which have closed during the initial lockdown period; equipment checks (e.g. oven and fridge temperatures) to ensure it is working properly, additional pest control measures for areas where there has been a lack of activity on site, inspections to assess the safety and quality of raw materials and the need for re-ordering out of date or contaminated ingredients. Suppliers, changes to ingredients, new or re-worked products, allergen risks and the need for changes to labelling, packaging and menus.	All staff who need to be consulted in such a review.	**Examples:** written procedures, photographs, invoices, inspection and testing records.	**Examples:** regular review, spot checks.

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3. How will you ensure all of your staff understand the measures needed to prevent the spread of COVID-19 whilst at work?	**Points to Consider:** guidance, training, staff meetings to discuss distancing and hygiene requirements, regular reviews of knowledge and understanding.	All staff who need to be consulted in such a review.	**Examples**: written procedures, guidance documents, training records, notes of team meetings to raise staff awareness of government guidance.	**Examples:** Managers to test staff knowledge at daily meetings, spot checks on implementation.

Implementing physical distancing

4. What procedures will you put in place to ensure appropriate physical distancing (i.e. 2m separation) is maintained between staff in food production and handling areas?	**Points to Consider:** Home working arrangements for office staff, reducing staffing levels in production areas, kitchens, and sales. Re-design of workflow, measures to prevent non-essential movement between work areas, floor markings and/or Perspex screens to ensure separation.	All staff who need to be consulted in such a review.	**Examples:** written procedures, workflow plans, photographs, clocking in records.	**Examples:** on-going supervision by managers
5. What procedures will you put in place to ensure appropriate physical distancing (2m) is maintained between staff in communal areas including changing facilities, toilets, staff rooms, canteens, corridors and smoking areas?	**Points to Consider:** Procedures for staggering break times, providing additional space for breaks (e.g. using office space), limiting the number of staff at any one time, additional signage, implementing 'one way' systems in corridors. Mandatory wearing of face coverings by staff in workplace canteens, and also in indoor communal areas, including corridors and staff rooms, where 2m distancing is difficult to maintain.	All staff who need to be consulted in such a review.	**Examples:** checklists, written procedures, photographs of signage.	**Examples:** on-going supervision by managers

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6. Are there any specific food handling tasks where maintaining 2m physical distance between staff presents a challenge, and are additional measures possible which will prevent the spread of COVID-19?	**Points to Consider:** The need to review all operations for specific tasks where staff are likely to experience difficulties in maintaining a 2m distance, and what changes or additional protections can be implemented, such as reducing the number of staff involved in particular tasks, the use of mechanical aids, working side by side rather than face to face, reducing the time taken to complete the task and/or implementing physical barriers such as screens or assessing the use of additional PPE (including face masks) which is appropriate to the task.	All staff who need to be consulted in such a review.	**Examples:** records of discussions with staff, written procedures, photographs.	**Examples:** regular checks by managers, reviews with staff.
7. What procedures will you put in place to ensure appropriate physical distancing is maintained between customers and staff both within and outside your premises?	**Points to Consider:** The number of people who can be accommodated in the available space within the premises and outdoor waiting areas, ensuring the 2m distance (or where appropriate for hospitality businesses, 1m with additional mitigation measures), are maintained. Construction of physical barriers to facilitate structured queuing systems, restricting the number of people entering the premises at any one time. Signage for reminding customers of physical distancing requirements, floor markings to support separation.	All staff who need to be consulted in such a review.	**Examples:** written procedures, photographs.	**Examples:** on-going monitoring and improvements implemented where required.
8. If you are offering a take-away/food to go service, what procedures will you put in place to minimise contact between staff and customers during transactions and food pick-ups?	**Points to Consider:** Mechanisms for ensuring physical distancing between staff and customers both within the premises and when food is delivered to the customer's home. Ensuring customers, and staff (where appropriate) are wearing a face covering (create obvious information notices to remind customers face coverings are now mandatory). Encouraging customers to order their deliveries online, by app, or by phone, and considering systems which allow customers to pick up orders without entering the premises. Allow contactless payment on site where needed. Staggering collection times, designating areas for pick-up/collection, ensuring delivery drivers are instructed to maintain a 2m distance from customers when food is delivered.	All staff who need to be consulted in such a review.	**Examples:** written procedures, training records, photographs.	**Examples**: on-going monitoring and improvements implemented where required.

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9. If you are intending to serve food to customers on your premises, what procedures will you put in place to ensure physical distancing requirements are maintained?	**Points to Consider:** Floor and table plans which ensure there is 2m distancing between different groups of customers and staff (or 1m with additional mitigation measures), allowing adequate space for movement throughout service. Consideration of additional mitigation measures required such as screening between tables and at bar and payment areas to ensure adequate separation between staff and customers. Measures to prevent opportunities for crowding at entrance/exit points, toilet facilities and bar areas for example through the display of posters or use of floor markings indicating the appropriate distance, queuing systems and the designation of separate payment and pick up points.	All staff who need to be consulted in such a review.	**Examples:** written procedures, training records, photographs.	**Examples**: on-going monitoring and improvements implemented where required.
10. What additional procedures will you put in place to ensure any essential visitors and customers do not present a risk of spreading COVID-19?	**Points to Consider:** Ensuring the mandatory wearing of face coverings by customers in retail, take-away and indoor hospitality premises (when moving around the venue), alongside public facing staff. Health declarations for all essential workers and officials to prevent infected individuals from entering the premises. This includes customers, enforcement officers, auditors, delivery drivers/maintenance crews/cleaning personnel. The need for measures to inform visitors of business procedures for preventing the spread of COVID-19, provision of additional handwashing facilities.	All staff who need to be consulted in such a review.	**Examples:** written procedures, photographs.	**Examples**: on-going monitoring and improvements implemented where required.
11. Do you provide accommodation and transport to your employees, and if so, have you reviewed these arrangements are reviewed to ensure they do not present a risk of spreading COVID-19?	**Points to Consider:** Prevent sharing of accommodation, offering single occupancy options, and ensuring single rooms are available for workers who have reported symptoms. Ensure measures are in place which enable physical distancing to be maintained in shared spaces such as kitchens and toilet facilities. The need to enhance cleaning schedules for staff accommodation, especially after occupants have been required to self-isolate and at changeover points. Ensure physical distancing can be maintained during travel to work by encouraging transport arrangements which minimise the number of staff in each vehicle (e.g. more trips with fewer passengers). Restrict car sharing to groups who share accommodation and work areas. Promote the wearing of face coverings on public and private transport.	All staff who need to be consulted in such a review.	**Examples:** written procedures, photographs.	**Examples**: on-going monitoring and improvements implemented where required.

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Ensuring staff and customers implement effective personal hygiene				
12. What facilities and/or procedures will you put in place to enhance the implementation of effective handwashing practices by all staff to prevent the spread of COVID-19 ?	**Points to Consider:** The need to review provision of hot water, soap, and paper towels to ensure handwashing can be undertaken at all appropriate points within both food production and communal areas. Provision of sanitising gels (in addition to handwashing facilities) in appropriate areas. Assessing training requirements of staff. Posters to remind staff of effective handwashing technique.	All staff who need to be consulted in such a review.	**Examples:** written procedures, training records, photographs of facilities and posters.	**Examples:** regular checks by managers.
13. How will you ensure all staff are undertaking effective hand hygiene measures at appropriate points within food production/work and communal areas?	**Points to Consider:** The need for supervision of handwashing practice by staff, appropriate frequency of training.	All staff who need to be consulted in such a review.	**Examples:** audit schedule, training records.	**Examples:** implementation of an audit/monitoring schedule to monitor improvements in handwashing practice by staff.
14. If you are intending to serve food to customers on your premises, what procedures will you put in place to ensure they are undertaking effective hand hygiene measures?	**Points to Consider:** The need to undertake regular checks of handwashing facilities to ensure there are adequate supplies of hot water, soap and paper towels. Display of posters on effective hand washing practice in toilets and washrooms. Refer to Scottish Government guidance on public toilets. Provision of hand sanitiser at entry and exit points, and at payment areas to be used following transactions.	All staff who need to be consulted in such a review.	**Examples:** posters, stock takes, staff training records	**Examples:** records of spot checks by staff

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15. If you are intending to serve food to customers on your premises, what additional measures will you put in place to prevent contamination through hand contact?	**Points to Consider:** Identify common touch points and measures for minimizing contact e.g. by delivering cutlery and individually wrapped condiments only when meals are served. Clearly displaying food and drink options in central locations (e.g. posters, screens) or provide laminated menus which can be cleaned and disinfected after each use.	All staff who need to be consulted in such a review.	**Examples:** photographs, staff training records	**Examples:** regular checks by managers.

Implementing effective cleaning and disinfection

16. What changes will you make to your cleaning and disinfection procedures to ensure they are capable of controlling the potential spread of COVID-19 from food handling staff and customers?	**Points to Consider:** The need to review existing cleaning and disinfection regimes to identify areas where additional measures may need to be applied in areas where there is increased human contact such as handles, rails, switches. The need to review cleaning and disinfection at all toilet facilities to ensure it is undertaken at a frequency which is appropriate to capacity and levels of usage. The need to check with suppliers on purchasing of chemicals which have been proven effective against coronaviruses. The need to ensure that changes made to cleaning and disinfection will not cause damage to surfaces/equipment or the contamination of food.	All staff who need to be consulted in such a review.	**Examples:** Written procedures, labels/instructions confirming efficacy of cleaning and disinfectant agents against coronaviruses.	**Examples**: daily audits of cleaning and disinfection procedures, verification using ATP monitors, swabs.

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17. What procedures will you put in place to ensure existing (standard issue) PPE worn by staff, such as overalls and gloves, are changed and cleaned regularly in accordance <u>with government advice on COVID-19 control?</u>	**Points to Consider:** The need to review current procedures for laundering PPE to prevent the potential spread of COVID-19. Provision of contracted laundering services or facilities installed within the premises to ensure PPE does not need to be taken home by employees and is adequately cleaned after each shift.	All staff who need to be consulted in such a review.	**Examples**: written procedures, daily audit of PPE.	**Examples**: daily inspections to ensure clean PPE is worn at the start of each shift.

Ensuring managers understand what they need to do when staff become unwell due to COVID-19

18. How will you gather and assess information on the wellness of your staff to ensure that they are safe to work?	**Points to Consider:** The need to improve procedures for monitoring the health status of staff prior to each shift, ensuring line managers have regular discussions with all employees on health and well-being and are familiar with the symptoms of COVID-19.	All staff who need to be consulted in such a review.	**Examples:** Records of health declarations and notes of discussions with staff.	**Examples**: daily roll calls for staff, reviews by senior management on levels of awareness of staff health and welfare by team leaders.
19. What steps will you take to ensure staff are not incentivised to work if they are feeling unwell or have had contact with a symptomatic individual?	**Points to Consider:** The need for procedures which ensure staff are reminded of the self-isolation requirements for COVID-19 and that these are fully understood. 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 to implement procedures for raising awareness of published guidance such as daily meetings and posters.	All staff who need to be consulted in such a review.	**Examples**: Notes of meetings, policy documents, photographs of posters.	**Examples**: regular reviews of staff knowledge and awareness.

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20. How will you ensure staff comply with the requirements to self-isolate when themselves or family members are displaying symptoms of COVID-19?	**Points to Consider:** The need for managers to support employees who may be vulnerable to infection, including those who are shielding and 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 review existing return to work policy to take account of COVID-19 isolation requirements, and implement follow up procedures for staff who have been required to isolate.	All staff who need to be consulted in such a review.	**Examples**: Return to work policies, records of management training.	**Examples**: line manager reporting of staff adherence to policy, regular reviews of staff knowledge and awareness.
21. Are you aware of your own obligations as an employer under Scotland's Test and Protect Strategy?	**Points to Consider:** The need for procedures which ensure staff feel able to report symptoms and are not disincentivised to take time off work. The need to ensure managers are giving the necessary support to staff when they are required to self-isolate.	All staff who need to be consulted in such a review.	**Examples**: Return to work policies, records of staff training and procedures for maintaining contact with staff during the isolation period.	**Examples**: records of staff absence, recorded communications between managers and staff.
22. What procedures will you implement to prevent the risks of COVID-19 transmission in your food business if a member of staff becomes unwell and displays symptoms at work?	**Points to Consider:** The need for procedures and facilities which enable symptomatic individuals to isolate as soon as possible. The need for procedures and training to ensure contact with other employees is limited, and that staff who are in contact with infected employees are identified. The need for additional cleaning and disinfection regimes for decontamination of areas that have come into contact with a potentially infected individual.	All staff who need to be consulted in such a review.	**Examples**: Written procedures, training records.	**Examples**: regular reviews of staff knowledge and awareness.

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23. Have you reviewed record keeping in relation to staff on site, team composition, visitors and customers to the site to enable a rapid and accurate response if a case was identified and contact tracing was required across your site?	**Points to Consider:** The need for new procedures for recording details of staff shift patterns which allow individuals to be identified promptly if they have been in contact with co-workers who are showing symptoms of COVID-19 or if they have tested positive. The need for more robust procedures for recording the details of external visitors to the premises, including the timing of visits and the names of staff they may have been in contact with. The mandatory requirement within the hospitality sector to collect minimal customer contact details, and to share these details with public health officers for the purposes of contract tracing when requested.	All staff who need to be consulted in such a review.	**Examples:** Policies and procedures, records of staff working on different shifts, records of customer contact details.	**Examples:** Regular checks of record keeping
24. Have you identified a point of contact to liaise with the local health protection team or other authorities in the event of an outbreak or requirement to undertake contact tracing across your site?	**Points to Consider:** The need to ensure managers are aware of contacts for NHS health protection teams. The need to discuss with FSS and Local Authority enforcement officials an appropriate course of action when more than one case of COVID-19 is identified in the business.	All staff who need to be consulted in such a review.	**Examples:** Contact information records, written procedures.	**Examples:** regular reviews of manager knowledge and awareness.

Ensuring you have considered the impacts of COVID-19 on your Food Safety Management Systems (FSMSs)

25. How will you assess the impact of additional measures needed to prevent the spread of COVID-19 on your existing FSMS?	**Points to Consider:** The need to review your FSMS in light of any new measures implemented within your business for preventing the spread of COVID-19. E.g. to assess the impact, on potential food safety risks, of enhanced cleaning and disinfection, and changes to workflow.	All staff who need to be consulted in such a review.	**Examples**: Documented procedures for reviewing FSMSs, staff training records.	**Examples**: on-going review by managers.

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26. What changes will you have to make to your existing FSMS to accommodate the additional measures needed to prevent the spread of COVID-19 throughout your business?	**Points to Consider:** The need for assurance that changes to staffing levels, workflow, hand hygiene and cleaning/disinfection procedures do not compromise the safety of your products.	All staff who need to be consulted in such a review.	**Examples**: Documented FSMS/HACCP reviews, staff training records.	**Examples**: enhanced monitoring of FSMS.
27. What additional changes will you have to make to ensure food safety, standards and traceability due diligence is not compromised as a result of COVID-19?	**Points to Consider:** The need to review impacts of COVID-19 on suppliers, sourcing of ingredients and provision of consumer information and allergen risks.	All staff who need to be consulted in such a review.	**Examples**: Supplier records, documented reviews of HACCP, menus and labelling.	**Examples**: enhanced monitoring of FSMS.
28. What procedures do you have in place which will ensure remedial action is taken as soon as possible following any breakdown in your COVID-19 and food safety management controls?	**Points to Consider:** The need to increase the monitoring and supervision of staff to ensure any breakdown in COVID-19 control measures is identified as soon as possible, and that changes to working practice are not presenting a risk to food safety.	All staff who need to be consulted in such a review.	**Examples**: Documented HACCP reviews, staff training records.	**Examples**: enhanced monitoring of FSMS and H&S monitoring.

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29. How often will you review protective measures that have been implemented to prevent the spread of COVID-19, to ensure you are continuing to follow any updated government advice or guidance?	**Points to Consider:** The need for dedicated procedures for staying up to date with government guidance on COVID-19. Ensure continued referral to the Scottish Government website Coronavirus (COVID-19): Local Protection Levels, for details on the COVID protection level that applies to your local area and the restrictions that apply.	All staff who need to be consulted in such a review.	**Examples**: Documented reviews of guidance materials.	**Examples**: regular checks by managers.
30. Add any further information here that may be relevant to your business				

Confirmation/sign-off:

BUSINESS NAME:	DIVISION/GROUP:
DATE COMPLETED:	DATE DISTRIBUTED:
REVISION NUMBER AND DATE:	
MANAGER APPROVAL (signature):	EMPLOYEE REPRESENTATIVE APPROVAL (signature):
MANAGER NAME:	EMPLOYEE REPRESENTATIVE NAME:

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