



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. 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.

During Phase 1 of the Routemap, the tool will therefore be applicable to the following FBOs:

- 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) which are planning to re-start during this period.

FSS will review the tool in line with Scottish Government's review of lockdown restrictions, and the re-opening of other businesses during later phases of the routemap, 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 (social) 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 Scotlish 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, 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.

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)

Similar guidance has been produced by UK Government:

- <u>Food Standards Agency Guidance on hygiene and food safety requirements for food</u> 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 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. 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.

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

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: 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.	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?	Points to consider: 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.

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 (SOCIAL DISTA	ANCING)		
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 to ensure separation.	All staff who need to be consulted in such a review.	Examples: written procedures, workflow plans, photographs, clocking in records.	Examples: regular checks 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.	All staff who need to be consulted in such a review.	Examples: checklists, written procedures, photographs of signage.	Examples: regular checks by managers.

6. Are there any specific 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 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.
	Points to Consider: The number of people who can be accommodated	All staff who	Examples: written	Examples: on-going
7. What procedures will you put in place to	in the available space within the premises and outdoor waiting areas, ensuring the 2m distance can be maintained.	need to be consulted in	procedures, photographs.	monitoring and improvements
ensure appropriate		such a review.	procegospine.	implemented where
physical distancing (2m) is maintained	Construction of physical barriers to facilitate structured queuing systems, restricting the number of people entering the premises at any			required.
between customers both within and outside	one time.			
your premises?	Signage for reminding customers of 2m physical distancing requirements, floor markings to support separation.			
	Points to Consider: Mechanisms for ensuring physical distancing	All staff who	Examples: written	Examples: on-going
8. What procedures will you put in place to	between staff and customers both within the premises and when food is delivered to the customer's home.	need to be consulted in	procedures, training records,	monitoring and improvements
minimise contact between staff and	een staff and Encouraging customers to order their deliveries online, by app, or by	such a review.	photographs.	implemented where required.
customers during transactions and food pick-ups?	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.			

9. What additional procedures will you put in place to ensure any essential visitors do not present a risk of spreading COVID-19 to staff?	Points to Consider: 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. ENSURING STAFF IMPLEMENT EFFECTIVE PERSONNELS.	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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10. 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.
11. 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 schedule to monitor improvements in handwashing practice by staff.

IMPLEMENTING EFFECTIVE CLEANING AND DISINFECTION

12. 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 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.

procedures, labels/instructions confirming efficacy of cleaning and disinfectant agents against coronaviruses.

Examples: Written

Examples: daily audits of cleaning and disinfection procedures, verification using ATP monitors, swabs.

13. 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 with government advice on COVID-19 control?

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 APPROPRIATE ACTION IS TAKEN IF STAFF BECOME UNWELL DUE TO COVID-19				
14. 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.
15. 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 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.
16. 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 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 staff training and procedures for maintaining contact with staff during the isolation period.	Examples: line manager reporting of staff adherence to policy, regular reviews of staff knowledge and awareness.

17. 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.
ENSURING YOU	HAVE CONSIDERED THE IMPACTS OF COVID-19 C	ON YOUR FOOD SAFETY	MANAGEMENT SYSTE	MS (FSMSs)
18. 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.
19. 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.

20. 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.
21. What procedures do you have in place which will ensure remedial action is taken as soon as possible following a 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.
22. 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.	All staff who need to be consulted in such a review.	Examples: Documented reviews of guidance materials.	Examples: regular checks by managers.

