

The following measures are for consideration by Food Business Operators (FBOs) who are re-opening a business that has been closed due to coronavirus restrictions. Useful information and links on minimising the risk of the incidence and spread of coronavirus on the premises are also provided for businesses who are now open and operating.

The numbered web links are referenced at the end of the document.

Starting up/Before opening

1. Water supply

If your building was closed during the coronavirus outbreak, water system stagnation may have occurred due to lack of use, increasing the risks of Legionnaires' disease. If your business utilises water storage tanks and these tanks have been isolated for a period time and not been maintained throughout your closure, then you must follow all relevant protocols for the safe recommissioning of such tanks.

The Legionella Control Association (LCA) indicates the minimum expectation for small, simple hot and cold water systems would be flushing through with fresh mains water. In other cases, including premises with water tanks the expectation is likely to be for more extensive flushing followed by cleaning and disinfection. (Links [1](#) & [2](#))

2. Condition of Premises and Equipment

When premises have been closed for a prolonged period of time it is essential to carry out thorough checks prior to re-opening to ensure that they are in a safe condition, do not present a risk of contamination and will allow for the hygienic production or handling of food. Carry out a walk-through of the premises to ensure it is in a good state of repair and that no damage has occurred during the closure. Check all essential equipment is operating and in good condition.

3. Services

Ensure the essential services required for power, hot and cold water supply and drainage are working as intended. Contact your waste contractor to ensure that commercial waste from the premises will be uplifted.

4. Cleaning

Following prolonged closure, a 'deep clean' should be carried out to ensure the entire premises is adequately cleaned/disinfected prior to reopening. This should be done in accordance with and supplemented by your existing cleaning schedule. Ensure that hand contact points such as door handles, tap handles, light switches and soap/hand towel dispensers (list not exhaustive) are not missed. Consideration should also be given to communal areas such as staff rooms, changing rooms and staff toilet facilities.

Flush clean water through machines that are plumbed into the water supply, such as dish washers, ice machines, drinking fountains, coffee machines, slush-ice makers, post mix guns, self-service soft drink machines and water coolers, in order to flush through any stagnant water. Follow the manufacturer's instructions on settings to be used for cleaning if equipment has not been used for some time.

5. Stock check/food disposal

As many businesses will have closed unexpectedly and at short notice, checks should be made for expired durability dates. You must remember to include partially used items such as sauces that require to be used within a specific period once open. Ensure waste food is disposed of appropriately and quickly and is not allowed to accumulate inside or outside the premises. As daily temperature monitoring will not have been undertaken check there is no evidence of temporary power failures within your equipment such as fridges and freezers. If there is any evidence that defrosting may have occurred the food should be disposed of. It is difficult to assess for evidence of temporary power failure within refrigerators, so where there is any doubt whatsoever about product safety then all relevant precautions must be taken i.e. disposal of products. It is however highly likely that food items stored within the refrigerator will now have exceeded their durability dates and should therefore be discarded. Oil in fryers should be replaced, particularly where it has been left uncovered.

6. Pest Control

Temporary closures can put businesses at risk of potential pest infestations due to the lack of business activity and maintenance of pest guarding during closure. Thorough pest control checks must be carried out prior to reopening. Any noted pest activity or presence must be addressed. It is recommended that you seek assistance from a reputable pest control contractor to aid you with this.

Operating under The Health Protection (Coronavirus) (Restrictions and Requirements) (Scotland) Regulations 2020

It is critical that food businesses prioritise the safety of their staff as an essential resource and to ensure all of their employees are following government guidance on infection prevention and control measures against COVID-19. It is of the utmost importance that food businesses continue to uphold their existing good hygiene practices pertinent to food and customer safety as well as further supplementing them in light of the current situation.

We understand that businesses may look to change their business model and diversify in order to maintain their business during this time. In addition to the information below if you have any specific enquiries please e-mail environmentalhealth@westlothian.gov.uk and an officer will contact you to discuss your new business model so that we can help to ensure that you are doing this safely.

Food Standards Scotland have put together a generic risk assessment tool to help food businesses review facilities and workflow in line with COVID-19 hygiene and physical distancing requirements. This will help to identify any changes that need to be made when re-starting food production and service operations following lockdown ([link 3](#)).

Whilst undertaking your risk assessment, please refer to the COVID-19 guidance produced by both Food Standards Scotland ([link 4](#)) and Health and Safety Executive ([link 5](#)), as well as Scottish Government's sector guidance for easing lockdown. Scottish Government Retail Sector guidance can be found via [link 6](#).

The Scottish Government's Tourism and Hospitality Sector Guidance now includes statutory guidance for the hospitality sector, including restaurants, pubs, bingo halls and casinos ([link 7](#)). Please read this carefully as businesses operating in the hospitality sector are now required by law to have regard to this.

In addition to the current controls you already have in place these are some additional issues you need to consider:

1. Physical (Social) Distancing

It is essential that the requirements of the above mentioned regulations and any statutory guidance are adhered to at all times during operation.

You must risk assess, and put in place, control measures to ensure that all staff and customers obey physical distancing requirements i.e. maintain a 2m distance from each other. This may include the redesign of workflows, implementation of "one way" systems, reduction in your capacity, staff numbers and menu, as well as changes to the way in which you interact with your customers during service, food collections and deliveries.

Some retail and catering businesses can use a 1m minimum distance only after carrying out a risk assessment and implementing further mitigation measures. It is essential that clear signage is displayed at entry points and throughout the premises to inform customers they are within a 1m physical distancing zone. For bingo halls and casinos, the 1m exemption only applies to the contained hospitality areas of the business i.e. the bar, restaurant or café. A 2m physical distance must be maintained in all other areas.

You must ensure that the required physical distance (2m or 1m) can be maintained between people on the premises at all times. This applies to everyone except members of the same household and individuals with their Carers. Clear signage should be displayed to remind customers of this requirement. See [Appendix 1](#) of this document for further information on this.

The use of screens, signs and marking tapes may help you implement such measures. Some examples of signage can be found in the Food Standards Scotland guidance, the Scottish Government Tourism and Hospitality Sector Guidance or resources provided by our colleagues at North Lanarkshire Council at [link 8](#).

The limits on households mixing indoors and outdoors also apply to hospitality. Measures must be in place to avoid exceeding these limits. Premises capacity should be determined by the need for physical distancing and systems should be in place to safely manage capacity to avoid overcrowding. It is essential that crowding in general is not permitted. Standing areas must currently be avoided.

Each group using your premises must be a **maximum** of

- 6 individuals, from
- 2 households

Children under 12 do not count towards the number of individuals allowed but do count towards the two households permitted.

Further guidance on workplace safety, including industry specific guidance can be found via links [9](#) and [10](#).

2. Collection of Customer/Visitor Details

It is now mandatory, in hospitality settings, to collect contact information for customers and visitors to help support Test and Protect. This only applies to those customers being served on the premises and not to activities such as takeaway. Information is needed for each customer unless it is a small household group where information can be collected from one member of the household (along with a note of the number of members from the household visiting the premises). Information records should be held for at least 21 days.

3. Infection Control

You have responsibilities to ensure food handlers are fit for work under the food hygiene regulations. In addition, you have a general duty to ensure the health, safety and welfare of persons in your employment and members of the public. Ensure the Government's infection control policy in relation to coronavirus is followed. All staff should be familiar of the symptoms of Coronavirus (high temperature/fever and/or new continuous cough and/or loss/change in sense of taste/smell) and of the actions to take should anyone display symptoms. Guidance on symptoms, actions and subsequent cleaning and disinfection of areas can be found via links [11](#), [11a](#) and [12](#).

4. Personal Hygiene

All food handlers must regularly wash their hands using warm running water and hand soap (for at least 20 seconds) and dry them with disposable paper towels. Alcohol based hand sanitiser gels can be used in addition to hand washing, but it is important to note that they only work on visibly clean hands. **They should never be used as a substitute to hand washing with soap and water.** Staff should be reminded of the importance of thorough and frequent handwashing and it is advised that you implement regular monitoring checks to ensure staff are adhering to effective hand washing techniques. Customers should be encouraged to use a sanitiser on entry to the premises. Further guidance on handwashing can be found at link [13](#). **Use of disposable gloves is not a suitable alternative to regular thorough hand washing and their use is not encouraged.**

5. Cleaning/sanitising

During operation, it is advised that you increase the frequency of your ongoing cleaning/disinfecting activities to at least every two hours, particularly for hand contact surfaces and worktops. For regular cleaning and disinfecting of key touch points (including worktops, door handles, grab-rails in corridors, stairwells, keypads, vending machines, etc), use a disposable cloth, first clean hard surfaces with warm soapy water then disinfect these surfaces with the cleaning products you normally use.

Consideration should be given to augmenting existing cleaning procedures that comply with Food Standards Scotland's current E. Coli O157 Control of Cross Contamination Guidance (link [14](#)) and the additional regular cleaning of hand contact areas with cleaning agents known to be effective against viruses e.g. use of quaternary ammonium compounds as there is evidence that such can deactivate viruses. Products bearing the EN 14476:2019 standard should have been tested for efficacy against enveloped viruses (although not specifically the virus responsible for COVID-19). (Link [15](#) gives further technical background).

6. Toilet Management

Businesses must include in their risk assessment full consideration of how toilets will be safely managed and used and implement the necessary measures. Guidance has been published on the safe use of toilet facilities to help achieve this. See link [16](#) for further information.

7. Menu control & Suppliers

Due to the current restrictions, food premises may be working with reduced staff numbers, this can potentially increase the risks to food safety such as greater potential for cross contamination to occur. A review of your menu may be required with a view to potentially reducing the range of foods available for order.

It is important to remember that if you have made any changes to your menu, or if your supplier(s) or ingredients change, you must ensure you have reviewed your allergy information.

You should continue to ensure that you use reputable suppliers. As many businesses have temporarily closed, there is an increased risk of food fraud with unfit, unsafe, out of date or sub-standard food entering the supply chain.

8. Food Collection and Deliveries

As previously mentioned, you must continue to ensure that physical distancing requirements can be maintained during food collections and deliveries. Give consideration as to how you might achieve this e.g. encourage contact-free delivery, phone orders and staggered collection times.

If you are introducing a food delivery service as a new aspect then ensure that you consider temperature control and vehicle cleanliness during transit of orders.

9. Food Safety Management System & Staff training

You must ensure that consideration is given to hazards, controls and monitoring procedures when making any of the above or other procedural changes such as the introduction of a takeaway/delivery service to ensure there is no compromise to food safety. Your current Food Safety Management System must be updated and staff, (existing and new/replacement), instructed/trained appropriately in all new procedures and made familiar with its contents.

There is no relaxation on food law legal requirements for matters relating to food safety and standards, as well as in relation to the training requirements of food handlers during this COVID-19 pandemic. All new staff still require to be supervised and instructed and/or trained in food hygiene matters commensurate with their work activity. Staff in their entirety should be trained on any measures implemented by the business to prevent the spread of COVID-19.

10. Heating, Ventilation and Air Conditioning Systems (HVAC)

With regards to COVID-19 related ventilation issues Chartered Institution of Building Services Engineers (CIBSE) have produced recommendations that can be found via link [17](#) that suggest that dilution of internal air should reduce the risk of potential airborne transmission and that any HVAC which normally run on a recirculation mode be switched to an external intake where possible and that recirculation between areas occupied by different people should be avoided. In relation to vacated buildings, they are recommending that HVAC runs continuously at reduced speeds.

11. Face coverings

A face covering must be worn by all people in a number of indoor settings including, shops, takeaway restaurants, pharmacies, hairdressers, beauty parlours, bars, pubs, cafes and restaurants.

Some people do not have to wear a face covering including for age, health, or disability reasons.

Owners, members of staff, or volunteers, of indoor premises where it would otherwise be mandatory to wear a face covering do not need to wear a face covering if they are physically separated (by means of, for example, partition screens) from customers or if they maintain a 2 metre distance from customers or members of the public.

Customers may remove their face coverings while seated at a table in a restaurant, cafe, bar or public house.

Links for further information

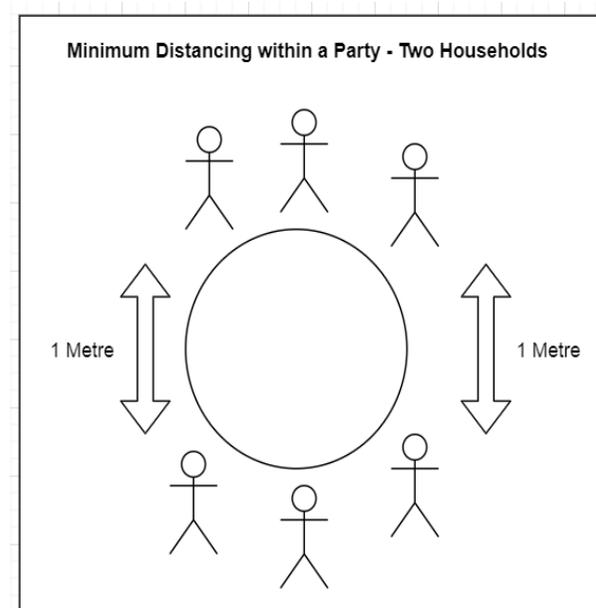
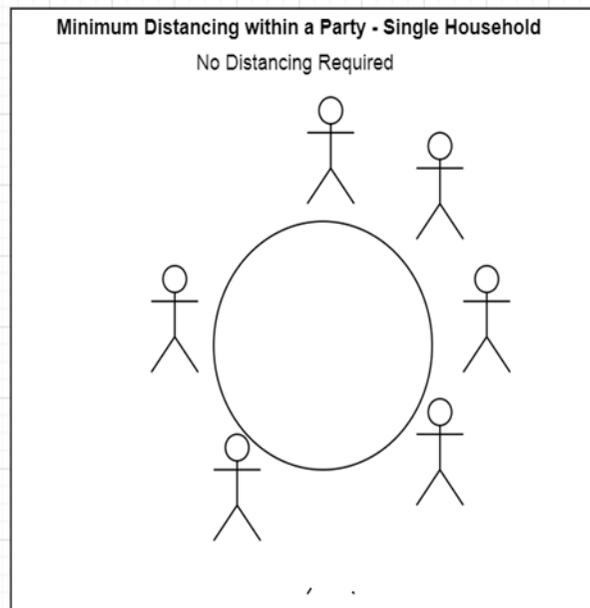
<u>1</u>	Safe management of water systems in buildings during the Covid-19 outbreak	https://www legionellacontrol.org.uk/news/90/
<u>2</u>	Legionnaire's disease. The control of legionella bacteria in water systems Approved Code of Practice and guidance	http://www.hse.gov.uk/pubns/books/L8.htm .
<u>3</u>	COVID-19: Risk assessment tool for food business operators	https://www.foodstandards.gov.scot/downloads/COVID-19 - _Risk Assessment Tool for Re- starting Food Business Operations During COVID- 19 %28July 2020%29.pdf
<u>4</u>	Food Standards Scotland COVID-19 - Guidance for Food Business Operators and Their Employees	https://www.foodstandards.gov.scot/publications-and- research/publications/covid-19-guidance-for-food-business-operators- and-their-employees
<u>5</u>	HSE – COVID-19 latest information and advice	https://www.hse.gov.uk/coronavirus/index.htm
<u>6</u>	Scottish Government COVID-19: Retail Sector Guidance	https://www.gov.scot/publications/coronavirus-covid-19-retail-sector- guidance/
<u>7</u>	Scottish Government COVID-19: Tourism and Hospitality Sector Guidance	https://www.gov.scot/publications/coronavirus-covid-19-tourism-and- hospitality-sector-guidance/pages/overview/
<u>8</u>	North Lanarkshire Council Coronavirus posters	https://www.northlanarkshire.gov.uk/index.aspx?articleid=34936
<u>9</u>	HSE Short guide to workplace safety re Coronavirus	https://www.hse.gov.uk/news/assets/docs/working-safely-guide.pdf
<u>10</u>	HSE Working safely during the coronavirus (COVID-19) outbreak	https://www.hse.gov.uk/coronavirus/working-safely/index.htm?
<u>11</u>	Coronavirus in Scotland	https://www.gov.scot/coronavirus-covid-19/
<u>11a</u>	NHS Inform Coronavirus general advice	https://www.nhsinform.scot/illnesses-and-conditions/infections-and- poisoning/coronavirus-covid-19/coronavirus-covid-19-general-advice
<u>12</u>	COVID-19 - guidance for non-healthcare settings	https://www.hps.scot.nhs.uk/web-resources-container/covid-19- guidance-for-non-healthcare-settings/
<u>13</u>	How to carry out hand hygiene	http://www.nipcm.hps.scot.nhs.uk/resources/hand-hygiene-wash- your-hands-of-them/how-to-carry-out-hand-hygiene/
<u>14</u>	E.coli O157 Control of Cross Contamination Guidance	https://www.foodstandards.gov.scot/publications-and- research/publications/ecoli-o157-control-of-cross-contamination
<u>15</u>	The Society of Food Hygiene and Technology guide to cleaning and disinfection regimes in food operations with regard to COVID19	http://www.sofht.co.uk/wp-content/uploads/2012/11/Guide-to- Cleaning-and-Disinfection-Regime-With-Regard-to-novel- Coronavir....pdf
<u>16</u>	Scottish Government COVID-19: opening public and customer toilets	https://www.gov.scot/publications/coronavirus-covid-19-public- and-customer-toilets-guidance/pages/hygiene-measures/
<u>17</u>	COVID-19 and HVAC Systems	https://www.cibse.org/coronavirus-covid-19/coronavirus-covid-19-and- hvac-systems

- In addition to the above, useful information for employers is available from Healthy Working Lives via <https://covid19.healthyworkinglives.scot/employer-information>
- You may find the FSS summary checklist at https://www.foodstandards.gov.scot/downloads/FSS_COVID-19_summary_checklist_for_restarting_food_businesses.pdf useful

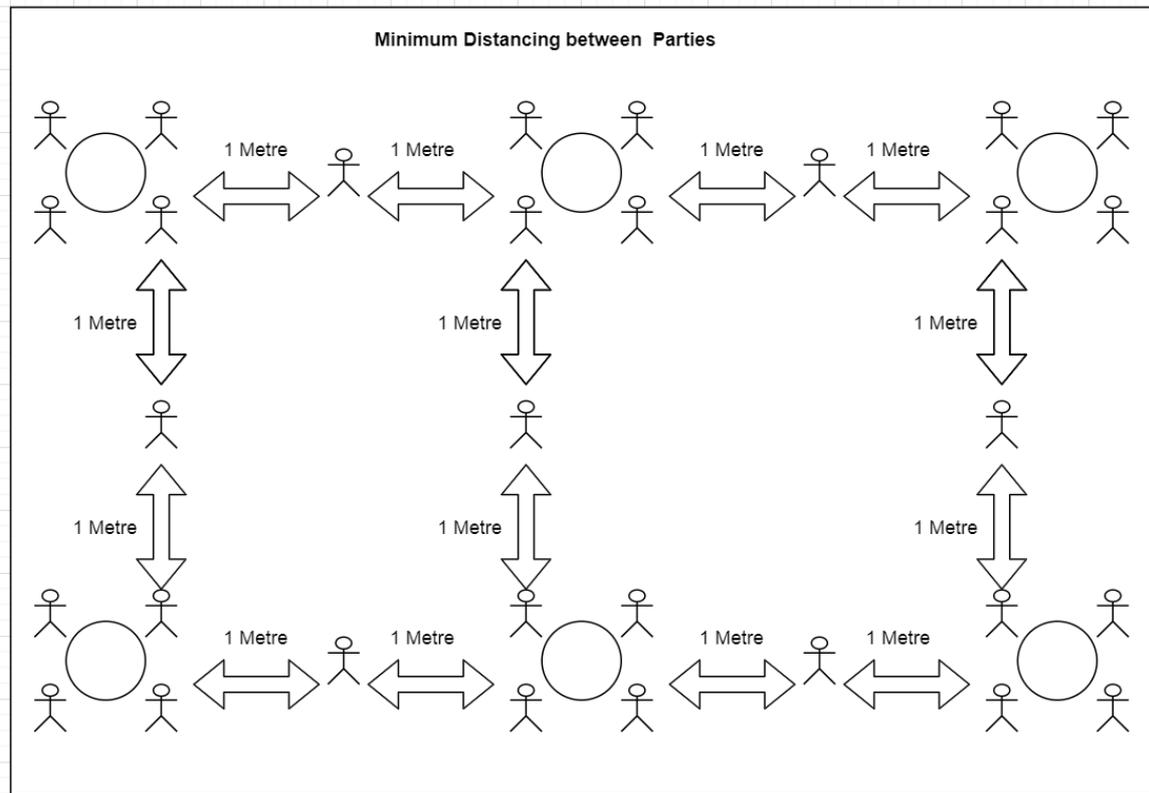
Physical (Social) Distancing in Hospitality Premises

Please note that these graphics depict 1m physical distance. This applies to premises where a risk assessment has been carried out and additional mitigation measures have been implemented to use this exemption, otherwise 2m applies.

- The appropriate physical distance must be maintained between all individuals throughout the premises – not just between seated parties;
- Circulation space to allow customers access to their tables, toilets, etc. must also permit the appropriate physical distance to be maintained;
- Toilet and hand wash facilities must be managed to ensure the appropriate physical distance can be maintained. This is likely to require facilities to be taken out of use and access managed/supervised.



Appendix 1

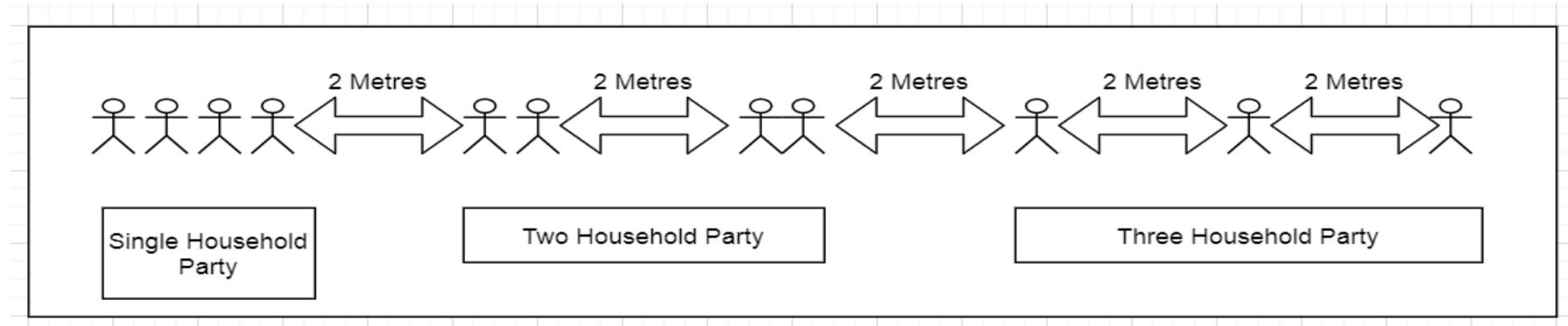


Appendix 1

Queues

Queues need to be managed by the business. All members of separate household must maintain the appropriate physical distancing

- Within premises 2m (or 1m where a risk assessment has been carried out and additional mitigation measures have been implemented)
- Outside premises 2m



Diagrams in this appendix based on originals produced by Aberdeen City Council Environmental Health