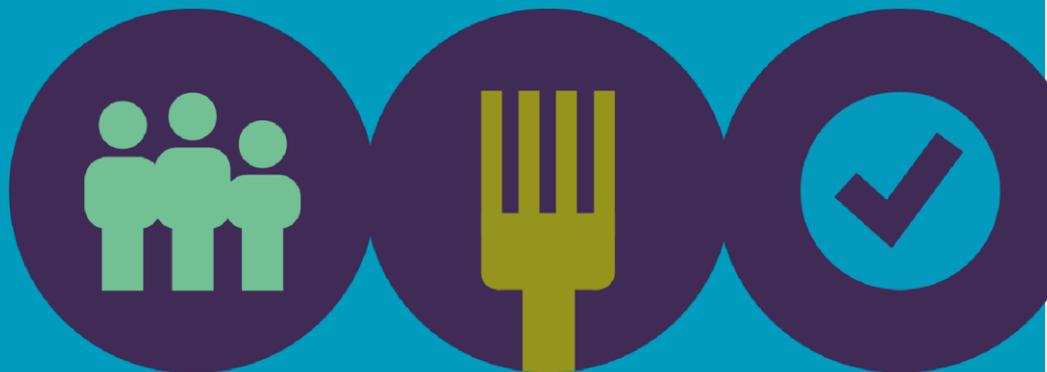# The investigation of COVID-19 outbreaks in food businesses

**Guidance for Food Business Operators (FBOs):
What to expect from an Incident Management Team (IMT) investigation**

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The investigation of COVID-19 outbreaks in food businesses

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Purpose

This guidance document has been produced by Food Standards Scotland (FSS) and Public Health Scotland (PHS) to support Food Business Operators (FBOs) in preparing for the investigations that will take place when an outbreak of COVID-19 is suspected in their workforce. It also outlines how the Incident Management Team (IMT) will decide on the actions that need to be taken to stop the further spread of COVID-19 in the workplace and the wider community.

FBOs should note that this document is intended as a guide to the types of questions that they are likely to be asked during an outbreak investigation, and the broad principles that the IMT will apply when making decisions. It is important to recognise that every outbreak is different, and there is no single set of defined criteria that can be used in every outbreak situation to determine the steps that need to be taken to protect public health, including whether a business should be closed or can remain open.

The IMT investigations, and actions taken in each investigation will depend on the specific circumstances associated with each food business and the nature of the risks involved. In order to minimise the impact on a business, it is critical that the FBO is able to demonstrate to the IMT that they have taken appropriate steps to protect their workforce from the risks of COVID-19. This document points FBOs to relevant guidance which will help them to control the spread of COVID-19 in their business, and will help them to identify what they need to do when an outbreak is identified in their workforce, and understand how health protection teams will decide on the actions that need to be taken to protect public health.

Introduction

How to identify a potential outbreak of COVID-19 in the workforce

An outbreak of COVID-19 in the workforce can have serious health consequences for staff and their wider community, as well as financial and reputational implications for the business. It is therefore critical that FBOs ensure that there are measures in place to prevent the spread of the virus and that their staff are given appropriate training and support to protect themselves and their colleagues from the risks of infection.

During the pandemic, it is especially important for FBOs to maintain up to date records of the working patterns of their staff, including shift times and locations, and to maintain accurate sickness absence records across the whole workforce. This information will enable FBOs to identify a possible outbreak of illness and assist IMTs in determining the action that is needed to prevent the spread of the virus when their employees become infected.

An outbreak should be suspected if there are two or more confirmed cases of COVID-19 in the setting within 14 days or an increase in the background rate of absence due to suspected or confirmed cases of COVID-19.

In order to protect public health, it is particularly important to respond quickly to potential outbreaks identified in food processing businesses (e.g. meat plants, vegetable packers and fish processing facilities), as the conditions which often prevail in these environments (including cool temperatures, low UV and poor ventilation) can enable the virus to persist and spread quickly. FBOs in these businesses should regularly engage with managers to ensure that any case of COVID-19 reported to them is followed up to identify potential risk factors that could lead to the rapid spread of infection to other members of staff e.g. through shared accommodation or transport.

What to do when an outbreak is suspected

If there is **any** indication that an outbreak of COVID-19 may have occurred in the workforce (or that there may be an increased risk of one occurring-see above), the FBO must contact their local NHS Board Health Protection Team (HPT) at the earliest opportunity. **Contact details for local HPTs across Scotland can be found at this link.**

The HPT will carry out an initial assessment to establish quickly the scale of the risk both within the premises and also to the wider community. If the HPT suspects an outbreak has occurred, it will convene an IMT to confirm whether this is the case. Once an outbreak has been confirmed, the IMT will take over to investigate the cause, identify the actions that need to be taken and provide advice on how the outbreak and appropriate public health measures should be communicated externally to prevent the spread of infection. The main responsibilities of the IMT[1] are to:

- Reduce to a minimum the number of cases of illness by promptly recognising the source of the outbreak, defining how cases have been exposed, identifying and controlling the source of that exposure, and preventing secondary exposure;
- Minimise mortality and illness by ensuring optimum health care for those affected;

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[1] https://hpspubsrepo.blob.core.windows.net/hps-website/nss/1673/documents/1_shpn-12-management-public-health-incidents.pdf

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- Inform the patients, exposed groups (including those potentially exposed), staff, clinical and management colleagues, public, their representatives and the media of the health risks associated with the outbreak and how to minimise these risks; and
- Collect information which will be of use in better understanding the nature and origin of the outbreak and on how best to prevent and manage future incidents.

It is important that FBOs understand the need for IMTs to operate on the "precautionary principle" when responding to outbreaks. This means that they will usually err on the side of caution whenever there is uncertainty to ensure the risks of COVID-19 transmission are contained as much as possible. Therefore, FBOs can support risk based decision making within the IMT by ensuring they have access to comprehensive, accurate and up to date information on all aspects of their operation, including plans of the site, staff names and contact details, control measures, risk assessments, absence records etc. This will enable the IMT to consider all reasonable control measures, including the possibility of closing all or part of a business if the IMT considers it necessary.

The first action of an IMT will be to undertake a **risk assessment**. The purpose of the risk assessment is to establish an appropriate risk management response and the actions needed to prevent any further spread of COVID-19. **Public health protection is the main priority for the IMT, and the investigation is fast-paced, meaning that there will be a requirement for FBOs to provide information very quickly.** It is especially important for FBOs to be able to provide complete and accurate information around the controls they have put in place to manage the risks of COVID-19 across their business, and evidence that these controls are being applied effectively. If an FBO is able to provide assurance to the IMT that they have robust controls in place, it is less likely that a full business closure will be required.

Controlling COVID-19 in the workplace – What FBOs are expected to know

It is critical that all FBOs are familiar with their legal obligations with regard to COVID-19 controls and the relevant guidance documents on safe working practices during the pandemic. For food businesses, the key document is Food Standards Scotland's (FSS's) guidance for food business operators and their employees. This document is intended to support all food businesses in identifying and implementing the measures needed to prevent the spread of COVID-19 across their operations, and will assist in preventing outbreaks within the workplace. A risk assessment tool has also been developed by FSS, which allows food businesses to identify, record, review and maintain the changes that need to be made to prevent the spread of COVID-19 across their operation.

The FSS guidance supports the over-arching sector guidance produced by Scottish Government, including the manufacturing sector guidance, which should be referred to by all food processors and manufacturers. Scottish Government has also produced a Scottish workbook, which includes advice on how local and national public health agencies take the action needed to prevent coronavirus spread, together with advice on the management of outbreaks.

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Guidance for FBOs – How to prepare for an IMT

In order to ensure FBOs are able to contribute effectively to an outbreak investigation it is important that they understand in advance what information the IMT will require. Annex 1 summarises the key measures that should be applied by food businesses to prevent the spread of COVID-19, which will be the main focus of an IMT investigation. It should be noted that this information is intended as a guide and cannot be taken as definitive because circumstances will inevitably influence an IMT approach.

However, as a minimum, it is expected that FBOs will be familiar with FSS's guidance and other relevant sector guidance produced by Scottish Government on the key control measures for preventing the spread of COVID-19 in the workplace. FBOs should also have recorded the measures they have implemented to provide evidence that they are taking appropriate action to protect their workforce from the risks of infection. FSS's risk assessment tool provides a simple means for enabling FBOs to undertake internal audit, to review and record their COVID-19 prevention plans on an on-going basis, and can be used to provide evidence to the IMT of the actions they have taken.

FBOs are advised to prepare for the following questions at an IMT:

1. **Do you have accurate records for staff working on each shift (including factory/shop floor and office staff) and visitors to your site?** An up to date list of employees and visitors contact details, and their location on-site during each shift/visit.

2. **How do you organise your workforce?** Accurate records of workforce organisation, including information on arrangements for bubbles or cohorts of staff working in different areas of the premises; cross-over of staff between shifts.

3. **Are your staff permanent employees or do you use agency/contract staff? Do any of your staff work between multiple sites or businesses?**

4. **How do employees move through the premises-have you identified any high risk areas where it is difficult to maintain 1 m physical distancing?** Floor plans showing entry and exit points, one way systems, identification of potential cross-over/congregation points and what additional controls are in place at areas where staff may be likely to congregate (e.g. face coverings or partitions).

5. **Are any of your staff required to move between the office environment and the factory/shop floor (e.g. managers, administrators or health and safety advisors)? When these staff are required to attend the factory/shop floor are they taking appropriate precautions to ensure COVID-19 controls are not being compromised?**

6. **Do you have documented plans in place for controlling the spread of COVID-19 leading up to the outbreak?** A record of COVID-19 Risk Assessment and Risk Management (RM) Plans (based on FSS and SG guidance), and information on how this was developed and assessed (e.g. by an external consultant, LA or Health and Safety Executive (HSE) official).

7. **What preventative measures have you put in place to reduce the risks of COVID-19 at work stations**? Information relating to how you have re-designed workflow to

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maintain 1 m physical distancing or separation between staff to prevent the spread of infection in the working environment/factory floor (e.g. reductions in line speed, introduced Perspex screens between work stations (which do not impede ventilation), floor markings).

8. **What preventative measures have you put in place to reduce the risks of COVID-19 in offices located in your premises?**

9. **What preventative measures have you put in place to reduce the risks of COVID-19 in communal areas, such as canteens, changing areas, toilets, stairs, lifts and corridors?** e.g. staggered break times, one way systems, additional hand sanitising stations, wearing of face coverings.

10. **How have you ensured that staff are able to apply the measures you have put in place for controlling the spread of COVID-19 effectively and consistently? Do you have on-going internal audit procedures in place to ensure control measures are being reviewed and recorded on a regular basis? The IMT is likely to seek assurance on the following areas:**

   - Hygiene control procedures including the availability of handwashing facilities and the frequency of hand washing by staff
   - Monitoring to ensure physical distancing measures are being adhered to at all times both on the production line/factory floor and in communal areas in the premises.
   - Health monitoring procedures to ensure staff are self-isolating when required
   - Training procedures to ensure staff are reminded of the measures and any new controls that have been put in place
   - Methods for ensuring effective communication to staff, taking account of potential language barriers (e.g. through the use of posters/signage and one to one discussions with managers)
   - Records of cleaning in key work and communal areas including the identification of common touch points, cleaning methods and frequency of procedures
   - Additional mitigation measures to prevent person-to-person transmission, e.g. the wearing of face coverings.

11. **What are your standard PPE requirements for staff[2]? Do staff wear face masks or face coverings as an additional control measure for COVID-19? What measures are in place to ensure face masks/coverings can be fitted correctly with standard issue PPE? What procedures do you have in place to ensure face masks/coverings are worn and disposed of correctly?**

12. **What cleaning procedures have you put in place to control the spread of COVID-19 across your premises?** Have you identified common touch points (including switches, door handles, grab-rails in corridors, stairwells, keypads, vending machines, etc) and taken steps to ensure these are being cleaned and disinfected at frequent intervals? Are you using cleaning materials which are effective in eliminating Coronaviruses from surfaces?

13. **What arrangements are in place for staff to travel to and from the workplace?** Information relating to travel arrangements of staff. Are there car sharing arrangements

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[2] In this context, PPE (Personal Protective Equipment) refers to items that need to be worn as part of routine duties to protect staff from the hazards which specifically relate to their work, such as ear protectors and respirators. Face masks and face coverings worn for the purposes of controlling the spread of COVID-19 are not classed as PPE out with healthcare settings.

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in place? Does the business provide transport to the employees, and if so, have these arrangements been reviewed to ensure they do not present a risk of spreading COVID-19?

14. **What arrangements are in place for staff accommodation?** Does the business provide accommodation to the employees, and if so, have these arrangements been reviewed to ensure they do not present a risk of spreading COVID-19?

15. **Is your business open to the public and/or do you regularly have visitors on your site(s)? What measures do you have in place to minimise contact between essential visitors to your site and your employees?**

16. **What procedures do you have in place for communicating COVID-19 controls to staff. Is the workforce multi-lingual? If so, what has been done to support staff where English isn't their first language?**

17. **Do you have records of training provided to staff on COVID-19 prevention and control, and what is the frequency of training?**

18. **Does the business Fitness to work policy cover COVID-19? Are staff aware of how to recognise the symptoms of COVID-19 and the need to self-isolate when they or members of their household are experiencing symptoms or have tested positive for the virus?**

19. **Does the company provide sick pay for all members of staff who are required to self-isolate? Are staff aware of the financial support that is available to them if they will lose income as a result of having to self-isolate? (guidance on self-isolation).**

How decisions are taken by an IMT

An IMT will take a range of different factors into account when making decisions on how to respond to an outbreak of COVID-19[3]. It is important to note that not all factors will be relevant to all situations and it would be unusual for a single factor alone to be the only determinant for any recommended control measures, including a recommendation to close the business. All decisions will be based on all the available evidence, balancing public health considerations, the local community, the welfare of employees, the impact on the business, food security/supply, and (where relevant) any animal welfare concerns.

Concerns over public health protection will ultimately always be paramount, but the aim should be to keep workplaces safely open wherever possible, through the isolation of cases and their contacts and strengthening implementation of physical distancing and other protective measures. If the FBO is able to demonstrate to the IMT that they have implemented robust measures for controlling the spread of COVID-19 and that these measures are being maintained effectively, then it is less likely the business will need to be closed. **Where the FBO is unable to provide sufficient evidence that they have effective COVID-19 measures in place, the IMT will inevitably have less confidence in the business and will require stronger action to be taken to protect public health.**

In circumstances where the IMT needs to consider closing the business, it may be possible to restrict this to only certain parts of the workplace where there is evidence that the risk of spreading COVID-19 is confined to those areas or particular staff groups. Regardless of whether it is necessary to close the business either partially or in full, the IMT will work with the FBO to ensure the business can reopen safely at the earliest opportunity, subject to public health concerns being addressed and there being sufficient staff available to safely carry out the work.

The IMT will use the following information to decide what control measures are required to manage the risks of COVID-19:

1. **The controls which are already in place to minimise COVID-19 risks throughout the workplace**

Workplaces should already have implemented control measures for controlling the spread of COVID-19, and in some cases these will have been assessed by HSE or LA Health and Safety, or where relevant, the FSS. Measures for controlling the spread of COVID-19 in food businesses are outlined in the FSS guidance and FSS Risk Assessment Tool for food business operations. FBOs should have a record of their COVID-19 risk management plan based on this guidance, detailing the risk assessment, the workplace control measures in place and evidence that these measures are being maintained.

Particular focus will be given to high-risk areas of food businesses. While evidence is still limited, there appears to be an inherently higher risk of transmission in areas where certain manufacturing processes are taking place, such as meat cutting. Cool/ambient temperature and difficulties in implementing physical distancing are factors which may present an increased risk of spreading COVID-19 in these work areas.

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[3] https://www.hps.scot.nhs.uk/web-resources-container/management-of-public-health-incidents-guidance-on-the-roles-and-responsibilities-of-nhs-led-incident-management-teams/

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For areas where appropriate physical distancing presents a challenge, the IMT will wish to see evidence that additional mitigation measures have been implemented to prevent transmission including:

- Reduced line speed and changes to working practices to minimise face to face working
- Additional hand hygiene measures
- Enhanced cleaning
- Face coverings where appropriate
- Installation of Perspex or use of transparent screens (where they do not impede ventilation)

The IMT will also give particular attention to areas outwith the working environment where there may be an increased risk of staff coming into closer contact with one another including:

- means of transport to work (shared transport)
- access/entry areas to the sites
- communal areas, including:
  - Offices
  - Changing rooms
  - Canteen
  - Break areas
  - Toilets
  - Corridors
  - Stairs
  - Lifts
  - Staff rooms
  - Other shared facilities such as smoking shelters.

2. The staff who may be affected and where they are working on the premises

Where members of the workforce test positive for COVID-19, their location and working pattern will be investigated to assess the potential for more widespread infection. It should not be assumed that an outbreak in a specific part of a factory means that everyone in the factory is a contact.

The IMT will consider whether cases are restricted to particular physical areas of the workplace or to those working the same shift. If the outbreak is largely confined to one particular segment of the workforce it may be possible to limit measures to that group. The cohorting of staff by function or area of work will help FBOs to manage the risks and prevent outbreaks of infection from spreading throughout the business.

Consideration will also need to be given to office based staff and other employees who do not routinely work on the factory/shop floor. This is important both to ensure that COVID-19 control measures are being implemented effectively within the office environment, and that these staff do not compromise any of the controls that are in place to prevent the spread of the virus elsewhere in the premises.

For the reasons outlined above, it is important to ensure that plans of the site, along with accurate information concerning the locations of staff, cohorts/groupings and shift pattern arrangements are made available to the IMT as early as possible during the investigation. This information is essential in enabling the IMT to undertake a risk assessment and determine the appropriate action required.

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3. Transmission risk outside work

Consideration will be given as to whether staff could have become infected with the virus in the community rather than the workplace itself. Outbreaks identified in the workplace may be related to transmission and contact between staff outside work. This may include social mixing outside work, shared accommodation, car sharing or alternative types of home-to-work transport. Where evidence suggests that the spread of COVID-19 between staff could have occurred outside work, the solution is unlikely to be closure of the workplace.

FBOs have an important role in ensuring staff are aware of the steps they need to take to reduce the risk spreading COVID-19 outside of the working environment and when travelling to and from the workplace. During an outbreak investigation, the IMT will consider the degree to which employees understand these risks and how the FBO has communicated them to their staff.

The IMT will also consider the behaviour/actions of the workforce if the premises were to close. For example, if there are large numbers of agency workers affected by the outbreak they may feel the need to seek work elsewhere, resulting in them causing the virus to spread more widely in the community. For this reason, it is important for staff involved in an outbreak to understand the need to self-isolate and are aware of the financial assistance that is available to them during this period. Where staff are not eligible for sick pay, the IMT and HPT can provide advice on the welfare support that is available when a business is required to close as a result of an outbreak of COVID-19 (guidance is here).

4. Potential for COVID-19 to be spread through public contacts and visitors to the workplace

The IMT will assess the extent to which workplaces are accessed by members of the public/visitors to the site, and whether appropriate measures are in place to prevent them from coming into contact with employees. Physical distancing measures and face covering requirements for staff, visitors and the public will be reviewed as part of the risk assessment. Consideration will also be given to the risk assessment and mitigation controls applied by central government/agencies and/or LA staff who are required to work on site.

5. General hygiene measures

The IMT will review the facilities at the business which enable staff to follow good personal hygiene, including the adequate provision of hand sanitiser, toilets and hand-washing facilities, and regular environmental cleaning. The risk assessment will also take account of the procedures in place to monitor and verify the effectiveness of the cleaning and hygiene procedures.

6. Degree of confidence in the management team of the business

The leadership of the management team for the business is critically important in ensuring control measures are maintained to protect staff from COVID-19 in the workplace. The IMT will consider the extent to which team leaders and managers are engaging with staff on control measures. The degree of confidence is demonstrated by evidence of effective implementation of COVID-19 controls, the pace of action, the level of engagement with the Health Protection Team/ LA and the implementation of recommendations made by the IMT to improve these procedures.

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7. Quality and ease of communication with staff

The IMT will consider the methods used by managers to communicate with staff and the frequency of communication. Good communication, training and engagement with staff is an important aspect in controlling the spread of COVID-19 in the workplace. These should be regular, appropriate and effective. Two-way communication should be encouraged. Such communications should include consideration of members of staff for whom English is not their first language or who have poor literacy.

8. Intelligence from staff

An IMT will interview staff to seek understanding of the extent to which employees are content that measures for controlling the spread of COVID-19 are being maintained and are effective in protecting them from infection. This information can be collected either directly or indirectly through staff representatives or unions, and can be used to support improvements to existing control measures aimed at preventing future outbreaks.

Actions recommended by an IMT

Recommendations for actions to reduce the risk of COVID-19 in the workplace and amongst staff will be considered by the IMT, recorded in the minutes of the meetings and communicated formally by the chair of the IMT to the business. The IMT will also ensure that the appropriate regulators (HSE or LA Health and Safety) are involved in these discussions.

A recommendation to close a workplace will never be taken lightly and will only be made after due consideration is given to all the principles in this paper. The final decision to close should be made in conjunction with the relevant regulator(s) and the appropriate agencies and government department(s), such as FSS, Scottish Government Health, PHS and Local Authorities (LAs). Ideally, there should be consensus among IMT membership on whether to recommend closure. However, if agreement cannot be reached the ultimate decision regarding whether to recommend closure rests with the chair of the IMT.

It is important for FBOs to understand that the IMT is convened to manage a Public Health incident. It provides a framework to enable Public Health and other statutory agencies to fulfil their remits which includes minimising mortality and illness by promptly recognising the incident and identifying and controlling the source of that exposure. Therefore, Public Health concerns will take primacy in an IMT.

If an IMT recommends closure of the premises, the expectation is that the business should close. If an IMT does not recommend closure, the FBO is not expected to close although it is recognised that some businesses may wish to close voluntarily for production or safety reasons.

If a business does not close following a recommendation by the IMT, then an assessment will be made as to whether it is appropriate and proportionate to use legislation. Where necessary, steps will be taken to enforce closure using the powers outlined below.

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Powers to enforce closure of a business

Enforcement action will be taken when it is identified that a business is not adhering to public health guidance to control COVID-19 health risks to workers. The authority responsible for enforcing these requirements will be either the LA Environmental Health Service or the HSE. Ministers are also able to direct the closure of a business

Where a food business is found to be non-compliant, the relevant enforcing authority will consider a range of actions to improve control of workplace risks including the provision of specific advice to FBOs through to issuing enforcement notices or even prosecution.

If a business declines to comply with the IMT's recommendation to close, LAs and/or the HSE will consider enforcement action. Legislation and guidance which might apply includes:

- The Health and Safety at Work Act 1974
- The Health Protection (Coronavirus, Restrictions) (Directions by Local Authorities) (Scotland) Regulations 2020
- Scottish Government's coronavirus guidance including sector specific documents
- Scottish Government's Strategic Framework
- Health Protection (Coronavirus) (Restrictions and Requirements) (Scotland) Regulations 2020 (which are subject to amendments)
- The Public Health etc. (Scotland) Act 2008
- Health and Safety guidance on Risk Assessment during the coronavirus pandemic

Guidance on the legal directions that may be given by LAs to control or provide a public health response to the incidence or spread of infection by coronavirus, and the prohibitions, requirements or restrictions that may be imposed on a business which is found to be breaching COVID-19 requirements can be found on the Scottish Government website.

The HSE has also published specific guidance on its role in test, trace and outbreak response. "HSE has powers to stop activities which involve a risk of serious personal injury (Prohibition Notice) and to require improvements to risk control where there is a breach of the law (Improvement Notice). The minimum statutory period for compliance with an Improvement Notice is 21 days. HSE would be acting outside of the law if it used those powers to act on public health matters which are outside the purpose of HSWA."

Further information can be found in Scottish Government's guidance for safer workplaces.

Considerations for re-opening a food business following closure

As soon as any discussion on closure or part closure of a business is made, every effort will be made to support the FBO in identifying where changes or improvements need to be made in order to minimise the risks of any further incidents.

The re-opening of a premises is a decision for the IMT, together with the appropriate regulatory body. Guidance on how to reopen will be provided as quickly as possible based on the following:

- Compliance with any recommendations or improvement notices regarding exclusions and the installation of cleaning facilities to promote good personal hygiene, including the adequate provision of hand sanitiser, toilets and hand washing facilities; and environmental cleaning to a satisfactory level.

- Implementation of a COVID-19 safe environment to ensure that the risk of further spread in the workplace is reduced to a minimum. Guidance on working safely in food businesses during coronavirus is available on the FSS website.

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Annex 1 – Summary of COVID-19 control measures in food businesses

Hygiene control procedures

- Hand hygiene measures implemented 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. Appropriate disposal facilities for paper towels/tissues should be available.
- Measures in place to monitor handwashing at key points and at regular intervals on the production lines.
- Protocols in place for adequate PPE to ensure disposal facilities are available to allow single use of items, such as hairnets and gloves. Wherever possible, the necessary laundering services should be provided to ensure reusable items are washed in accordance with HPS guidelines.
- Robust increased cleaning and disinfection procedures implemented in all areas of the business.
- Adequate system and evidence (posters, leaflets and other materials available in all applicable languages) in place to make all staff and visitors aware of the need to control the spread of COVID-19 in their workplace.

Physical distancing procedures

- Physical distancing protocols implemented in all areas of the business.
- Measures in place to increase the distance between employees or segregate them whilst working on the line (reduce staffing levels, reduced speed of line, marking physical distancing spaces, fixed teams' or 'partnering' systems…).
- Additional measures in place when physical distancing is not possible to achieve due to the work carried out (Perspex panels, back-to-back or side-to-side work pattern, additional PPE and/or face coverings).
- Measures in place to ensure physical distancing in communal areas (staggered break times, one-way systems, increased space for break areas).
- Working from home procedures for office staff where possible
- Measures to ensure transport and accommodation comply with physical distancing and hygiene measures.

Ventilation

- Adequate and good quality ventilation through all areas of the workforce.
- Record keeping and monitoring of ventilation.
- Measure in place to increase the flow of outdoor air into indoor space, where appropriate.

Health monitoring procedures

- Expanded employee policies and procedures to include COVID-19 considerations.
- Declaration measures which specifically refers to absence of COVID-19 symptoms available for staff and visitors to site, including delivery drivers.
- Measures in place to isolate and remove symptomatic individuals and take any follow up action that may be required.

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- Measures to support the Test and Protect strategy.
- Return to work procedures in place regarding COVID-19.

Training procedures

- Staff training protocols on physical distancing, health monitoring, cleaning/disinfection and hygiene control procedures in place including hand washing techniques
- Ensure adherence to all training protocols

Additional areas to consider

- Develop comprehensive risk assessment and risk management – to be provided as evidence to IMT
- Ensure adherence to risk management procedures – **be sure you are doing what you say you are doing and can evidence it**
- COVID champions / marshals
- Develop and implement operational bubbles and cohorts – also consider how all staff enter and exit establishment
- Face covering guidance

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