

## Pubs DRAFT operational advice and risk assessment

The British Institute of Innkeeping (BII), the British Beer & Pub Association (BBPA) and UKHospitality have identified three key principles and procedures as we look towards the hospitality, leisure and tourism sector gradually re-opening venues, in order to play our part in the national economic recovery.

*This is caveated by our members being clear they do not wish to move ahead with re-opening before the time is right in this regard and there is a willingness to remain closed in support of the Government health-led advice in place.*

4. **A phased approach determined by social distancing guidelines**
5. **Continued and enhanced support for closed businesses (furlough, rents, financing) and tapered support for businesses able to partially open and are initially loss making**
6. **Industry-developed operational protocols and advice (such as this document)**

Pub businesses have been operating successfully to high standards within the existing requirements of Health & Safety in the workplace, food hygiene and licensing conditions. In particular, existing licensing conditions ensure our pubs operate a professional, managed and safe environment for the consumption of alcohol. Overall, we feel pubs will be well equipped to successfully implement operational protocols in their business, based on the below advice.

In addition to existing licensing and health and safety requirements, the Government's COVID-19 Secure guidelines are the requirements to adhere to make your business COVID-19 safe. These can be found here <insert once published>.

To do this, you must have an individual risk assessment for your pub outlining how you are meeting these guidelines and carry these out in your business to keep your staff and customers safe. An example risk assessment can be found at annex 1.

The advice in this document is a collation of good practice to inform **your** robust risk assessment and changes to **your** premises and operating plans, supported by individual risk assessments for each specific site as each hospitality business is different.

It will be key to ensure that all elements of the risk assessment can be evidenced in a practical way in line with the Government COVID-19 Secure guidelines. This document brings together input from across the wide spectrum of hospitality businesses to help inform their own risk assessments for their individual businesses.

We envisage compliance checks will be carried out by enforcement bodies such as Environmental Health Officers, and these will be responsible for checking your risk assessment, evidence and your operational practices in place in your establishment.

- Read and understand the Government COVID-19 Secure advice here <x>
- Read and understand the relevant advice sections below and how these can apply to your own pub
- This guideline has been developed for a pub, however all businesses, other areas of guidance are available (e.g. letting bedrooms)
- Make any adjustments to your operating procedures and premises based on this advice and any other changes that you identify
- Complete your risk assessment reflecting the above (example at annex 1)

- Compile evidence to support your risk assessment
- Be prepared for an enforcement visit by a relevant person

## Advice to staff

Staff must not come to work if they have symptoms of COVID-19 or live in a household where someone has COVID-19. Staff will be regularly briefed and given training to ensure that the protocol is implemented and thoroughly applied.

Appended to this document is additional information that can be shared with staff via training and briefings, on areas such as known routes of transmission, steps to ensure staff can recognise COVID-19 symptoms which will form the basis of information to staff and customers. Relevant information will, where appropriate, be displayed in the workplace.

## Return to work

Pubs should carry out a return to work assessment of their staff and their circumstances, with a suggested list of criteria below. This should be carried out for all staff returning to work in the pub environment (taking into account GDPR requirements regarding sharing and storing information)

- Return to work interviews (phone)
- Survey all staff to find out pre-existing conditions (procedure to check whether these conditions are relevant based on Government/NHS 111 advice at the time)
- Identify staff within high risk shielding group – cannot work
- Identify people living with one of the 1.5 million people shielding – cannot work
- Staff with symptoms / living with someone with symptoms
- Transport to work considerations

Regular briefings to staff on latest Government and other advice regarding safe working (especially as and when advice is revised and updated).

- Review fitness to work status dynamically based on the above criteria and record this
- Reinforce your controls outlined in your risk assessment daily

The overarching Government guidance for all workplaces can be found here:

<https://www.gov.uk/government/publications/guidance-to-employers-and-businesses-about-covid-19/guidance-for-employers-and-businesses-on-coronavirus-covid-19>

This broad guidance is supplemented by the workplace-specific COVID-19 Secure guidance for pubs/hospitality businesses which can be found here: *[to be added once published]*

Consideration should also be given to the important area of staff mental health and general wellbeing, and this should be discussed with staff individually and options raised as part of your regular briefings. Remind staff of the resources available to them, both within the licensed trade through the Licensed Trade Charity, as well as any employer-specific resources and general advice available from the NHS and local mental health charities.

## Hand washing

- First and foremost, ensure all staff wash their hands immediately upon arrival at work or when they re-enter the workplace having been outside.
- Duty managers/appropriate person must remind everyone to wash their hands following recommended practice at the start of every shift (separately to washing hands at arrival).
- Hands should be washed using soap and water and following the guidance provided by UK Government. Alcohol hand sanitiser may also be used if available and, must have an alcohol content at least 60%. Alcohol gel sanitisers are a good additional resource and should be positioned to encourage use by staff and customers alike.

## Advice for staff to take home

A general commitment on the importance of hygiene to prevent spread of COVID-19 should be regularly communicated to staff, infection and quarantine guidelines, and actions to reduce risk of infection in the home (appendix 1).

## Staff protection

- As every pub business is different, a plan for the individual site and kitchen must be developed that takes account of the specific characteristics of the premises, reviewed and communicated to all staff, as part of the overall operational risk assessment for the specific business. Advice to consider for your business is listed below.
- Staff serving customers or taking payments must be protected, and whilst at the moment there is no obligation to use masks, wherever possible staff must keep the minimum distance away from customers as set out in Government guidelines. Where maintaining the distance is not possible, other mitigating measures should be considered.
- Implementation of measures best suited to the business and to protect staff and customers will be informed by the risks posed by the main routes of transmission.
- More frequent cleaning regimes must be implemented, in particular to disinfect all high throughput areas and frequently touched surfaces such as bar tops, tables, chairs, counters tills, card machines etc.
- For staff break areas, stagger timings so that staff have specific slots to come for their meals/break to reduce bunching up.
- Avoid as far as possible any need for sharing equipment i.e. phone, keyboard, pen, mouse and desk in the pub back office.
- Where this is impossible, all shared equipment should be disinfected before use with an alcohol wipe or appropriate surface disinfectant as advised by Government guidelines.
- Maintain minimum distance rules when taking deliveries and where possible use digital forms of delivery verification. For delivery COVID-19 Secure guidelines, please see here <x>.

- Advise that minimum distancing rules are applied at meal breaks, or smoking / vaping breaks
- For staff not wearing uniforms, consider advising that staff change into their work clothes on arrival at work, if it is practical to do so and there are sufficient storage options on site for travel clothes.
- Where uniforms are worn and washed on-site, these should be washed at temperatures above 60°C or a laundry sanitising agent used if the fabrics can't be washed at such a temperature
- For staff to protect others - Always sneeze or cough into a tissue and which should be placed into the bin immediately afterwards. If a tissue is not available you should sneeze or cough into the crook of your arm. In all cases, wash your hands or use an alcohol sanitising gel immediately after coughing or sneezing
- For cleaning contaminated surfaces in the pub, use disinfectants and sanitisers that are effective against bacteria as well as cold and flu viruses, as recommended by Government advice which can be found here: <https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings/covid-19-decontamination-in-non-healthcare-settings>
- Continue to remind staff that if they have a high temperature and/or a new, continuous cough they must not come to work and follow the latest self-isolating guidance (currently 7 days self-isolation). Advise checking staff temperatures as part of your overall risk assessment and operational plan.
- Continue to remind staff that if they with someone who has symptoms of coronavirus they must not come to work and must self-isolate (currently for 14 days). If the staff member then develops symptoms, this must be 7 days from onset.

## PPE

Provision and use of protective clothing and equipment for staff, based on their specific roles, should be entirely compliant and in line with Government and PHE guidance. PPE requirements should reflect the extent of risk and characteristics of each role within the pub.

## Training

**Training** should be given to ensure that staff understand the risks associated with COVID-19 and ways to protect themselves and customers and limit the spread of the virus. Training should be based on overall Government guidelines as a minimum.

Staff should be encouraged to build on training and where possible to challenge and change working practices to further reduce the chances of cross contamination.

## Advice to staff working in pub kitchens

- Use disinfectants and sanitisers that are effective against bacteria as well as cold and flu viruses, as recommended by the current Government advice which can be found here: <https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings/covid-19-decontamination-in-non-healthcare-settings>

- Cleaning regimes for kitchens should reflect the need to reduce risk from coronavirus as well as maintaining all expectations relevant to a food business regarding hygiene.
- Control movements of staff to maintain official social distancing measures where possible i.e. include one person at a time allowed in the chilled stores or dry stores, or the changing rooms and toilet.
- Handwashing of glassware, plates and cutlery should be avoided where possible with glassware washed separately from plates and cutlery.
- Where handwashing is necessary, staff should wear rubber gloves and use suitable products for cleaning and sanitation.
- During rinsing processes, advise temperatures above 60°C are reached, as disinfection of crockery and glasses requires this.
- Cloths and sponges etc used for cleaning should be changed daily and similarly used materials disposed of safely on a daily basis. Tea towels used for drying should be changed on a daily basis and washed at temperatures above 60°C or a laundry sanitising agent used if the fabrics can't be washed at such a temperature
- Consider restricting menu choices/options if this may help to ensure that access to food can be effectively controlled and monitored.

## Customer protection - Public bar operations

We recognise that the bar area(s) in pubs will be a challenging area to operate under physical distancing requirements. Dining area protocols, where customers could be managed to a higher degree, are set out separately. Below are considerations to take into account when drafting the individual site risk assessment:

- Each pub is different, ensure you have a bespoke plan for your specific premises that reflects your risk assessment.
- Advise identifying potential pinch points in the pub, where possible action to be taken to resolve or mitigate, and this process evidenced in the risk assessment.
- Customers informed of access restrictions and distance regulations by appropriate notices.
- Where possible obtain alcohol hand sanitiser (with minimum 60% alcohol content) for dispensers at bar (point of sale and/or order) and at external doors.
- Include measures to control physical distancing in any queues / waiting areas in the business.
- Advise customers not to enter if they have symptoms of COVID-19.
- You will need to manage current levels of distancing in queues or at the bar – for example floor markings. Customers may need to be asked to step back from bar counters so that staff can serve them safely if the counter is less wide than the current mandated distance guidelines.

- As part of your risk assessment, have a plan specifically for communicating and controlling access to customer toilets to ensure compliance with physical distancing rules and ensure all staff aware. Cleaning regimes for toilet facilities should be more frequent than under normal circumstances and using disinfectants and sanitisers that are effective against bacteria as well as cold and flu viruses, as recommended by the current Government advice which can be found here: <https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings/covid-19-decontamination-in-non-healthcare-settings>. Examples of other considerations include looking at closing urinals to maintain safe distancing levels if practicable, or installing some form of divider between them.
- Assess the flow of staff and customers in the pub as part of the risk assessment. If it appears to be a suitable mitigation, encourage table service where practical. For bar orders, people will need to be told to keep the minimum safe distance from barstaff as well as from other customers waiting in a queue to be served – e.g. as directed by tape marks on the floor. Measures to consider include managing the bar to create directional movement of customers ordering drinks at a till point, then moving to a second point to collect their drinks. Advise that empty glasses are collected from tables by staff, and customers discouraged from returning empty glasses to the bar.
- Restrictions on customers remaining at the bar after ordering and to eat and drink.
- Clean bar tops on a regular basis and table surfaces immediately after use.
- Clean high throughput areas, toilet facilities and regular touchpoints including door handles, push plates, PDQ machines, customer information screens, amusement machines on a regular basis.
- If you can offer cashless payments do so as a primary option. Discourage use of cash.
- Promotion within the pub of measures being taken by the staff and the pub operator, so customers are aware of their own responsibilities to create a safe environment when visiting the pub.

## Customer protection - Pub dining area/restaurant operations

- Customers informed of access restrictions and distance regulations by appropriate signage.
- Potential pinch points to be identified, action should be taken to resolve or mitigate, and this process evidenced in the risk assessment.
- Consider the use of reservation systems to control the frequency and placement of customers
- Customers will be informed of access restrictions and distance regulations by appropriate notices.
- It must be ensured that the current distancing level is maintained between guests in queues and between tables (including spacing tables to achieve this separation) to reflect Government physical distancing recommendations.

- Customer contact with commodities (e.g. menus, trays, napkins) should be limited to what is necessary or designed in such a way that cleaning / replacement is carried out after each use. Menus/table talkers discouraged in favour of customer display. Consider the use of single-use, disposable menus.
- Advise customers not to enter if they have symptoms of COVID-19.
- People will need to be told to keep the current social distance apart in queues – it is a good idea to put tape on the floor to mark out the distance.
- Plates, cutlery and glasses should be picked up only by staff to return to the kitchen/bar. Where possible staff should use gloves to collect table items or where gloves cannot be worn, should wash their hands following collection of table items and before moving onto another task, in particular the delivery of food to a new customer.
- Individually wrapped condiments, sauces and cutlery, could be offered on request and brought to the table together with customer's food order, rather than table being pre-laid or customers helping themselves.
- Cutlery to be brought to the customer with the food and condiments rather than customers helping themselves or left on the table. Individually wrapped condiments and sauces could be offered on request but should not be available to customers from a communal service area.
- If you can offer cashless payments do so as a primary option. Discourage use of cash.

## Takeaway services

Many businesses are offering take-aways and deliveries. You and all who work for you (and volunteers) must follow the legal requirements for food safety, including providing allergen information on request.

The Government has issued COVID-19 Secure workplace guidance for venues that are operating as takeaways. This guidance should be used as the basis for any risk assessments and operational mitigations implemented.

<https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/restaurants-offering-takeaway-or-delivery>

For detailed information from the FSA also check: [‘How to manage a food business if you sell products online, for takeaway or for delivery.’](#)

## Cellar

- As well as operational issues such as working in the cellar, your risk assessment will need to consider the various preparations that will need to be made in advance of opening; curtailment of furlough and potentially any relaxation of social distancing to support these activities:
  - Cellar/stock clearance
  - Equipment safety and operational assessments
  - Cleaning and hygiene measures
  - Stock delivery, replacement equipment and delivery of dispense gases etc.

Wash hands before entering the cellar. Normal practices for cellar maintenance should be followed and where possible by one person. If more than one person is required ensure that Government guidance on social distancing is being followed.

## Outdoor areas

Although easier to manage if a large outdoor area, there is a danger of groups forming. Consider the below as part of your risk assessment:

- Regular patrol of outside areas
- Patrolling gardens
- Restrictions that may be required for children's play areas.

## Live-in staff

Many pub have staff that live in the premises, and therefore consideration should be taken as to what happens if live-in staff develop COVID-19 symptoms. <This section under development>

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## Annex 1 – template COVID-19 Secure risk assessment (under development)

**Currently this example is for a food-led business, you will need to complete one for your own individual business. This is a draft under development.**

### **Risk Assessment Approach**

Whilst every business is different, there are two things in common – the staff and the customer. Both will have ‘journeys’ through the premises.

The main aim is to demonstrate that the business has considered the routes people take through the business and the hazard and risks encountered by both customers and the staff; confidence in management can be achieved by demonstrating the implementation of necessary controls. This is a hybrid of HACCP and a risk assessment.

Tracing the routes that people will typically take, either to carry out their jobs or as customers, will help inform what risks from coronavirus are involved, and subsequently how to take action to reduce these risks. This first flow diagram may then need to be adjusted if it is found that the route or journey needs to be changed to ensure a safer environment.

This risk assessment document could form the basis of discussions with the local authority prior to opening to ensure that there is agreement on the risk-based approach and controls set up. By setting concerns and control measures in a logical way this will give confidence to enforcement officers and customers to show that and show that due consideration has been undertaken.

Customers can be advised of actions taken to give confidence that the business has considered everyone’s safety. This will also be useful to ensure that customers know what the new “rules” are so that everyone’s expectations are managed in advance and that there is a reduced risk of any aggressive behaviour during their visit.

Primary Authorities could also be involved where businesses have one.

### **The hazard**

Coronavirus is a respiratory disease that can invade a host via the respiratory route or via hand to eye / mouth / nose contact. People who appear healthy may be carrying and shedding the virus, which can be passed on either directly or indirectly to others. This means we need to assume that anyone could be carrying the virus.

### **The main controls are:**

- Social distancing
- Disinfecting hand contact surfaces
- Hand washing and hand sanitiser use

### Flow Diagrams

By plotting out the routes taken by staff and customers in your business, you will have a clear idea of where the potential issues may arise, particularly in relation to social distancing.

After doing this you may find that your business needs to be adapted because you can't manage social distancing rules effectively, and you may to reconsider your whole business, or part of it to make it work. It is likely that you may then have to re-draw the "new normal" customer or staff journey.

Things you may need to consider include:

- New routes, for example a separate exit and entrance
- Reduced number of staff

How to use this document

- You should complete this document prior to re-opening after the lock down period.
- Carefully consider each section of the document and decide **which of the potential controls are suitable for your business**. Examples for different sectors are included in the sectoral guidance
- Indicate with  if you can use this control in your business, if not enter
- If you have your own ideas which will work better, please enter these instead.
- It may be that you simply cannot use any control in a section in which case state this.
- You should speak to your local EHO
- You can support this document with photographs of your control measures where appropriate and this would be useful for any discussions with the EHO which would have to take place virtually.

### Living Document

This is a living document that will be continuously edited and updated as understanding of the virus improves, government guidance changes and UKH members develop improved solutions

### TEMPLATE COVID-19 RISK ASSESSMENT

### Flow Diagrams

By plotting out the routes taken by staff and customers in your pub, you will have a clear idea of where the potential issues may arise, particularly in relation to social distancing. This is based on the current HSE approach to identifying risk in your business. The same

How to use this template document

- You should complete your own assessment, prior to re-opening after the lock down period.
- Carefully consider each section of the document and decide **which of the potential controls are suitable for your business.**
- If you have your own ideas which will work better, please enter these instead.
- It may be that you simply cannot use any control in a section in which case state this.
- You should speak to your local EHO
- You can support this document with photographs of your control measures where appropriate and this would be useful for any discussions with the EHO which could have to take place virtually.

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Customer Journey	Controls in my business <i>(Pick controls that suit your business from the UKH Sector specific advice or other guidance, or your own bespoke controls)</i>
Pre-booking (if feasible)	
Arrival outside venue	
Queuing outside	
Entering the business	

Customer Journey	Controls in my business <i>(Pick controls that suit your business from the UKH Sector specific advice or other guidance, or your own bespoke controls)</i>
Walking to table Either inside or outside	
Ordering food and drinks	
Bar Service	
Food and drinks service	
Clearing the customer table	
Going to the toilet	
Paying	
Leaving the business	
In-between customers	

Customer Journey	Controls in my business <i>(Pick controls that suit your business from the UKH Sector specific advice or other guidance, or your own bespoke controls)</i>
Continuous actions (cleaning etc.)	

Staff Assessment

Staff Journey	Controls in my business (based on above principles and/or own enhanced measures) <input checked="" type="checkbox"/> <input type="checkbox"/> or own solution
Before returning to work	
Pre-arrival	
Arrival	

Uniform change (if applicable)	
Kitchen Menu	
Kitchens	
Medium / large	
Small	
Food Storage Areas	
Cellar	

Work benches and tables	
Equipment	
Outdoor areas	
Deliveries	
Front of House	
Toilet Use	
Interaction with customers	

Interaction with work colleagues	
Using the Staff office	
Leave work	
Staff rest rooms	
When staff feel unwell <sup>n</sup>	

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