# COVID-19 Secure advice and risk assessments for hospitality businesses

**Version 1 - as at 25 June 2020**

## NOTE

Please note that this guidance applies to businesses in Wales. Similar guidance has been developed for other areas of the UK based on national frameworks.

This guidance document is not a legal document, it is intended to help hospitality businesses plan and prepare their own individual operational procedures. This will undergo further revision as further guidance and operational practices develop over coming weeks.

## ACKNOWLEDGEMENTS

This guidance has been created through consultation with a wide range of stakeholders (indicated in the document). UKHospitality would like to express its gratitude to the contributors for providing their invaluable input, and for continuing to work together as guidance and procedures develop.

# POSITIONING HOSPITALITY FOR AN OPTIMUM RECOVERY
## COVID-19 Secure advice and risk assessment for hospitality businesses in Wales

## What is this document?

UKHospitality, UKHospitality Cymru and our partners in the visitor economy sector have consolidated advice and good practice from many parts of the sector into one guidance document, to help businesses make their workplaces safe and secure, in line with Welsh Government guidance.

This document is not a comprehensive or prescriptive list, as each business is unique. It is intended to help businesses think about the specific measures that they themselves can reasonably take in their own workplace, to mitigate the risks and make their workplace safe. It will evolve as new guidance is published.

Once you have read and understood the Welsh Government's Visitor Economy Guidance (which can be found here) this UKHospitality document can be used in conjunction with other advice and, crucially, your own bespoke measures that fit your business. Links to relevant sources of further advice for businesses in Scotland are provided below.

## What do I need to do?

The Welsh Government's guidelines are the standards against which to assess your premises and make your business COVID-19 safe. As an employer, you have a legal responsibility to protect workers and others from risk to their health and safety. This means you need to think about the risks they face and do everything reasonably practicable to minimise them, recognising you cannot completely eliminate the risk of COVID-19.

This means you need to undertake a **risk assessment** for your individual premises and work activities, assessed against the relevant guidelines referenced at the start of this document. The examples in this advice document are to help you to translate into areas that may be relevant to your business, and any measures that are taken should fit appropriately with the operational needs of your business as well as relevant legal requirements.

The Health and Safety Executive has more information on its approach to managing risks and risk assessment, including a template risk assessment and examples (see below).

You should consult on, and share, the results of your risk assessment with your staff and colleagues either directly or via employee or Union representatives. HSE has guidance on worker involvement which may be helpful.

**Your respective Local Authority can provide advice to support risk assessments.** Public Protection Departments have the role of supporting business as well as enforcement action and advice for the public as consumers. Council officers can provide risk assessment templates, guidance notes and checklists.

This guidance does not supersede any legal obligations relating to health and safety, employment or equalities and it is important that as a business you continue to comply with your existing obligations, including those relating to individuals with protected characteristics. It contains non-statutory guidance to take into account when complying with these existing obligations. When considering how to apply this guidance, take into account agency workers, contractors and other people, as well as your employees.

We know many people are also keen to return to or contribute to volunteering. Organisations have a duty of care to volunteers to ensure as far as reasonably practicable they are not exposed to risks to their health and safety. This guidance around working safely during COVID-19 should ensure that volunteers are afforded the same level of protection to their health and safety as employees and the self-employed.

## What are the key principles to work through when doing my risk assessment?

You should read the COVID-19 guidance at [https://gov.wales/coronavirus](https://gov.wales/coronavirus) in full and note more than one guideline may have to be taken into account for your business. Some key risk control measures identified by the guidance are summarised below and should be worked through as part of the assessment process:

- In every workplace, increasing the frequency of handwashing and surface cleaning.

- Businesses and workplaces should make every reasonable effort to enable working from home as a first option. Where working from home is not possible, workplaces should make every reasonable effort to comply with the social distancing guidelines set out by the Government

- Where the social distancing guidelines cannot be maintained, in relation to a particular activity, businesses should consider whether that activity needs to continue for the business to operate, and if so, take all the mitigating actions possible to reduce the risk of transmission between their staff.

  Further risk reduction measures include:

- Further increasing the frequency of hand washing and surface cleaning.

- Keeping the activity time involved as short as possible.

- Where appropriate and achievable, using screens or barriers to separate people from each other.

- Using back-to-back or side-to-side working (rather than face-to-face) whenever possible

- Reducing the number of people each person has contact with by using 'fixed teams or partnering' (so each person works with only a few others).

<u>The sectoral advice in this document is a collation of good practice from across the wide variety of business in the hospitality sector, to help 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.</u>

You can use a risk assessment template available on the HSE website to help you keep a simple record of:

- who might be harmed and how

- what you're already doing to control the risks

- what further action you need to take to control the risks

- who needs to carry out the action

- when the action is needed by

The HSE guidance includes worked risk assessment examples, including one for food preparation, cooking and service (https://www.hse.gov.uk/risk/casestudies/pdf/foodprep.pdf) which may be helpful as a guide to think about some of the hazards in your business and the steps you need to take to manage the risks. It is important not to simply copy an example and put your company name to it as that would not satisfy the law and would not protect your employees. You must think about the specific hazards and controls your business needs. There is also a template risk assessment at annex 1 of this document.

This guidance document has been subdivided into different industry sectors to assist businesses in developing their own risk assessments, to ensure they can open and operate safely for their staff and customers in line with Government COVID-19 guidelines. Some businesses will operate across sectors and therefore may need to consider which elements work best for their premises.

We envisage compliance checks will be carried out by enforcement bodies (HSE or Local Authority), and these will be responsible for checking your risk assessment and the steps you have taken to manage the risks in your establishment. You should:

Read and understand the Welsh Government advice https://gov.wales/coronavirus

- Read and understand the relevant advice sections below and how these could apply to your own business

- Make any adjustments to your operating procedures and premises based on your own risk assessment

- Talk to your staff to gauge their concerns and whether you plan to addresses them, and if not how these can be addressed

- Complete your risk assessment reflecting the above (template examples at Annex 1, HSE template linked above)

- Communicate the results of your risk assessment (Government poster)

# OTHER RELEVANT SECTOR GUIDANCE PUBLISHED BY THE GOVERNMENT

**Reopening natural and cultural sites for recreation** guidance published by Natural Resources Wales Reopening natural and cultural sites for recreation

## Other considerations

**Legionella**

Due to premises being closed or having reduced occupancy during the COVID-19 outbreak, water system stagnation can occur due to lack of use, increasing the risks of Legionnaires' disease. Please find HSE advice here regarding reinstating water systems, air conditioning units and related systems.

https://www.hse.gov.uk/news/legionella-risks-during-coronavirus-outbreak.htm

Terrorism

Whilst the risk to health from COVID-19 is at the forefront of everyone's minds, the threat of terrorism nonetheless remains substantial.  It is essential that businesses and other organisations remain cognisant of these threats as they look to adjust their operations, ensuring that security measures are proactively adapted to support and complement other changes.

You should consider the security implications of any changes you intend to make to your operations and practices in response to COVID-19, as any revisions may present new or altered security risks which may need mitigations.  If you have a security department or manager, they should be consulted and involved throughout to help ensure good security is maintained as far as possible and that there are not any unintended security consequences of these changes. This should be achieved by conducting a security risk assessment of any new measures or changes. For further information consult the National Counter Terrorism Security Office (NaCTSO) and Centre for Protection National Infrastructure (CPNI) for specific security advice related to COVID-19

https://www.cpni.gov.uk/staying-secure-during-covid-19-0,
https://www.gov.uk/government/organisations/national-counter-terrorism-security-office

# Contents list

## Our core aim is to ensure our staff and our customers are safe in our businesses

Please note that this is a working document, the operational requirements outlined in this document are taken from current Government advice, operational practice and existing health and safety guidelines carried out by all hospitality businesses, enhanced social distancing measures and cleaning measures, and member planning for their individual businesses.

These guidelines have been developed by individual hospitality sub-sectors and other partners, as each sector and businesses within them are different. Using these guidelines and/or your own measures to develop site-by-site risk assessments will help business open safely.

# Amusement parks operational risk assessment considerations

As theme parks, aquariums, fair grounds, piers and other visitor attractions plan to re-launch after the pandemic de-escalates, there will be need to ensure that pleasure activities are both safe for guests and staff.

There may be many challenges ahead dependent on what guidance is given from government on how we can start the process of returning to normal operation and the various stages that may entail. Although this will be an ever-changing environment, we at BALPPA have started to put together some thoughts on re-opening, including the possibility of re-opening and operating on a reduced capacity for the attraction.

## Safety

Although the need to re-open for financial reasons is going to be essential for all operators, this still needs to be conducted in a controlled and safely managed process.

Here in the UK we have an excellent safety record and operational standards. This period is going to mean for many operators that competency and historical knowledge are going to be lost temporarily or permanently from the business. It is strongly advised that operators apply the same policies and procedures that are currently in place. Policies may have to be changed in some circumstances, but the standards should remain. Training, assessment, support and supervision will be critical during the initial opening period in all areas of your operation.

The Government has published workplace guidance https://gov.wales/coronavirus with information on managing contractors, social distancing at work, dealing with inbound and outbound goods and the provision of face coverings.

## Covid-19 Risk Assessment

When considering re-opening, in line with the Management of Health and Safety at Work Regulations 1999, all attraction operators will be required to prepare a suitable and sufficient risk assessment for the hazards associated with Covid-19, considering how their employees, visitors and others whom may be on site such as contractors, might be affected.  A risk assessment is a tool to identify the risk level associated with Covid-19 and the control measures being put in place for both employees and visitors in order to protect their health and safety.  For further information on risk assessment please visit the HSE Website. https://www.hse.gov.uk/simple-health-safety/risk/index.htm?utm_source=hse.gov.uk&utm_medium=refferal&utm_campaign=risk&utm_content=home-page-popular

## Health and Welfare of Staff

The Health and welfare of staff is of paramount importance in order to keep employees safe and healthy and give them confidence in being able to return to work.   The Health & Safety at Work Act 1974 places a general duty on Operators to protect the health and safety of its employees and others.  Suitable arrangements are to be put in place (as derived from the risk assessment process), to enable employees and visitors to be kept safe and healthy.

Once these arrangements are put in place, communicating and engaging with employees about these arrangements and protection measures in place is key.  It is important they understand what the measures are for and their part to play in implementing them.  Employees should be told how to report something to line management if something is not as it should be (https://www.hse.gov.uk/contact/concerns.htm)

Social distancing is a key part of the Governments Covid-19 protection strategy; therefore, consideration needs to be given to how social distancing measures can be applied to employee during their work and rest periods.

Social distancing may mean the re-thinking of how tasks are carried out.  Where safety critical tasks cannot be altered and social distancing during these tasks cannot be maintained, then suitable mitigating actions should be taken, for example:

Follow the govt guidance on where social distancing can't be maintained:

- o  Further increasing the frequency of hand washing and surface cleaning.

- o  Keeping the activity time involved as short as possible.

- o  Using screens or barriers to separate people from each other.

- o  Using back-to-back or side-to-side working (rather than face-to-face) whenever possible.

Reducing the number of people each person has contact with by using 'fixed teams or partnering' (so each person works with only a few others) Your risk assessment should identify these tasks and assess what protective measures are suitable.

https://www.hse.gov.uk/news/assets/docs/working-safely-guide.pdf

You should also provide support for workers around mental health and wellbeing.

## People who need to self-isolate

The current advice is that individuals who are advised to stay at home under existing government guidance do not physically come to work. This includes individuals who have symptoms of COVID-19 as well as those who live in a household with someone who has symptoms and those who are advised to self-isolate as part of the government's test and trace program. Enable workers to work from home while self-isolating if appropriate. See current guidance for employers and employees relating to statutory sick pay due to coronavirus. See current guidance for people who have symptoms and those who live with others who have symptoms.

## Guest Communications

Guest communications and guest behaviours will play a large part in the relaunch of our attractions. Communication throughout the entire guest journey will assist with the day to day operation and compliance with potential new attraction rules and guidance. Manging the guest's expectations before booking will reduce complaints.

- Updated website giving guests pre-visit information on what the attraction has in place to control risks

- Information about guests not attending your attraction if they are feeling ill

- What a guest should do if they start to feel ill whilst on site

- Signage around the attraction about social distancing and hygiene stations

- Guest communications given via PA

- Signage in toilets and washroom about how to clean your hands correctly

- Attraction maps indicating hygiene stations

- Information that some attractions may close during the day for cleaning

- Try and promote your site as a contactless payment preferred venue

- The use of social media to demonstrate the work and control measures that have been put in place by the attraction

## Staff Communications

It is vital to ensure Staff Communication is thought of at this time. Many staff may have been out of the business for some time and only seeing any attraction updates via social media. Update your staff on your plans and listen to any concerns or inputs. Staff will no doubt have a lot of questions when returning to work and may be nervous about large crowds. Ensure that your staff are fully prepared and have all the skills and knowledge they will need when facing our guests for the first time.

## Social Distancing

It is likely that when operators can re-open that this will be on a reduced capacity to enable government social distancing requirements whilst within our businesses. This is going to take a lot of planning, managing and auditing daily. Current government guidance is to calculate the maximum number of customers that can reasonably follow social distancing at the venue, taking into account total indoor and outdoor space, specific venue characteristics such as furniture as well as likely pinch points and busy areas.

This will be a difficult subject but below are a few thoughts on what could be applied.

- Make your venue a pre-bookable experience only to assist in capacity management

- Start with a manageable capacity to monitor if your new procedures are affective and then increase as appropriate

- Close your park, pier entrances to make it pay to enter rather than free to enter or apply a one in one out policy.

- Consider how tickets are checked (at booths etc.) to maintain social distancing Try and encourage guests to print out tickets at home or use technology for guests to gain entry to our attractions

- Leave additional spaces when parking cars

- Mark on the floor in queue lines showing social distancing points or physically modify queue lines

- Assess restaurant capacities and control measures to comply with social distancing

- Assess what areas of your business will be more complicated to open due to the potential social distancing requirements. These could include sit in restaurants, 4D Cinemas, batch operated attractions such as walk throughs, soft play areas and outdoor play equipment. Carefully assess how you can comply with the social distancing in these types of areas, it may not always be possible and some areas of your attractions may have to initially remain closed

- Avoid gathering guests in areas for items such as character shows, attraction events such as concerts or end of day parades

- Assess if rides cannot be run at full capacity due to fixed distancing, one family in a gondola, spaces between seats if guests are riding from different groups

- Think about your staff, split morning briefs into smaller groups, look at issuing briefs using notice boards or technology, if staff have been working from home then maybe look at some workers continuing to do so or where possible, management to continue to use technology such as skype/myteams to hold meetings

- Refrain from having staff socials for the foreseeable future

- Removal of some attraction furnishings or the spreading out of attraction furnishings such as benches and picnic tables

- Hygiene screens to be used in areas such as retail till areas, receptions and guest services

- Activities on park lakes will be largely permitted.  Guests to be reminded to stay clear of other lake users.  Lake user numbers to be limited and controlled to ensure this is achievable.

## Hygiene

Although our attractions already have high standards of hygiene there will be a more focused attention on this from our guests and staff. Additional cleaning throughout the day and extra procedures may need to be put in place during the initial re-opening period.

- A more detailed clean of areas that have mass contact each morning such as tills, ride containment systems, cash machines, lockers, scanners, counters or shared equipment such as radios and phones. This may need to be on a rolling basis.

- Closure/suspension of an attraction/kiosk/guest services during the day for a clean down

- Hygiene stations placed around the attraction on a risk assessment basis

- Sensor based soap dispensers, taps and hand dryers where possible

If required, provision and use of protective clothing and equipment for staff will be entirely compliant and in line with latest Government and PHE guidance.

https://gov.wales/coronavirus

- Additional breaks for staff to ensure that they can wash hands

- Staff to be trained about COVID 19

- Smoking areas to be made larger or closed

- Open bin styles or kick lids

- Clothing in retail outlets should not be tried on and returned to the rail

- Pick and mix should be pre bagged

- Onsite first aid centres should have a quarantine area and clean down processes

- Unmanned staff rooms should have a cleaning program in place

- Hand clocking in machines not to be used and data input manually, or timesheets move to a supervisor submission

- Ensure that the relevant training and COSHH information is available if new chemicals are being used for disinfecting areas or equipment

- Ensure where chemicals are used in areas of staff and guest contact that these chemicals are touch safe

- Think carefully about cleaning equipment on games such as hook a duck, hoopla, basketball games, throw the ball in the bucket, ideally between each game

- Risk assess arcades that have lots of human touch areas such as plastic guns, fruit machines, grab toy machines etc. If remaining open then ensure social distancing, increased cleaning of machine buttons and other touch points

- If continuing to use character costumes, then ensure that they are cleaned before each use especially if being used by multiple staff

- Do not schedule any close contact animal experiences.

- Encourage contactless payment at all points

- Consider staff workstations, office layouts, contractors or business visitors. Social distancing is not just for the public. It is critical we keep our staff safe

## Staff Competence

Staff in all departments of our businesses may have had extended time away from their job roles resulting in a loss of competence. Still apply your policies and procedures on relaunch as you would at any other time. If amendments are to be made to current policy and procedure, then approach this on a risk assessed basis. Each department will have different complexity of tasks and the staff members completing the most complex of tasks should at minimum be reassessed. A few thoughts on training and assessment.

- Use the most relevant person/people to complete training and assessment, it is not always the managers that know how the equipment and processes work the best, it's the people who have been completing the tasks for lengthy periods.

- Review your own training policies if needed and only change them if no other options are available

- If you do not have competent people at the initial stages of re-opening in some areas or on certain rides/attractions then do not operate them until training can be completed, the public will understand through an open and honest approach

## Ride Maintenance

Many attractions may have been sitting for lengthy periods with little or no operation. These attractions will need to have a detailed assessment before being put back into public use. Although most attractions would have recently completed their annual inspections, there is an array of issues that could occur during an extended closed period including corrosion, change in characteristics of lubricants, rodents, flat spots on wheels, excess dust

to name just a few. Many planned preventative checks would have been missed during this period including daily, weekly, bi-weekly, monthly checks etc. It will be essential that your maintenance program is reviewed and missed checks either completed or risk assessed. Some simple tips could include:

- Reviewing O&M manuals supplied by manufacturers for any details regarding lengthy non-operational periods

- Contact your manufacturer for advice

- Contacting your third-party independent inspection body for advice

- Review/complete missed planned preventative maintenance checks

- Complete additional test runs of attractions before recommencing operation

- Deep clean of all attractions

## Amusement Device Inspection Procedures Scheme (ADIPS)

All rides and attraction that fall under ADIPS still need to have a valid Declaration of Operational Compliance (DOC) for when the attraction is put back into public use. The standard has not changed and the HSE has confirmed that this will still be expected.

- Check all your attractions DOC's are still valid and in date before opening

- If DOC's have expired than work with your independent inspection body to put a plan together to have the attraction inspected and DOC issued

- There may be a rush for independent inspection so start your planning early

- DO NOT operate an attraction that does not have a valid DOC

## Water Quality/Legionella control

It is essential that when buildings reopen following the lifting of COVID 19 restrictions, that any water system is not simply put straight back into use. HSE has published guidance on Legionella risks during Covid-19, please see link at the start of the main document.  During the period of shutdown, it would be sensible to formulate a recommissioning plan for each water system to allow safe start-up and assurance to users that it is safe.  Where buildings have been empty for some time and during warm weather, it is likely that some increase in bacteria levels and biofilm will occur.

- Consider individual water systems

- Complete testing over a period of time before putting back into use

- Source third party advice and testing if the skill set is not within the business

- Keep records of your testing and results

- Normal water testing should continue for water attractions such as log flumes, rapid rides, water cannons, water spray effects etc as in accordance with the management of bathing water quality and repealing directive 76/160/EEC

- Flush through all water filters/softeners and coffee machines that may have been idle for extended periods