

COVID Safety Guidelines: Food Businesses

Phase 2, Version 1.0 18 May 2020

WA Government has implemented a staged lifting of COVID-19 restrictions based on the advice of the Australian Health Protection Principal Committee (AHPPC) and the WA Department of Health.

The purpose of this document is to outline the mandatory conditions on the re-opening of Food businesses, or where Food businesses are expanding beyond takeaway only. These conditions apply to Food businesses including: Cafes, Restaurants, Pubs, Clubs, Hotels, Roadhouses, Taverns and the Casino. These guidelines come into effect from 18 May 2020.

This document provides guidance on how to complete your COVID Safety Plan and implement necessary safety requirements.

Safety requirements

All businesses are required to mitigate the risks of COVID-19. The requirements for the safe operation of your premises are outlined below:

- maintain a strict limit of a minimum of four square metres (4sqm) per person
- ensure a maximum of 20 dine-in patrons per venue (excluding staff)
- maintain hygiene and frequent cleaning
- self-complete a COVID Safety Plan prior to re-opening (or expanding beyond 'takeaway only'), and display a COVID Safety Plan Certificate
- ensure staff have completed the AHA Hospitality & Tourism COVID-19 Hygiene Course before returning to work
- maintain attendance records of patrons for the purposes of contact tracing (not including takeaway services)
- carefully manage waiting areas to ensure social distancing
- only serve alcohol ancillary to a meal
- ensure alcohol is only consumed at a table (not counter service, or bar service).

All businesses need to do their part to comply with these requirements and help mitigate the risks of COVID-19.

COVID Safety Plans are an important part of ensuring that re-opening businesses does not increase the risk of spreading COVID-19. Failure to complete a COVID Safety Plan may mean your business is putting the community at risk. Authorised officers under the Emergency Management Act have the power to close premises and businesses that put the community at risk in this way.

COVID Safety Plan

The purpose of the COVID Safety Plan is to help ensure that businesses actively mitigate the risks of COVID-19 in line with the best available health advice. In the plan, you will need to explain how your business will take steps to implement the requirements and advice set out in these guidelines.

Prior to re-opening, you are required to self-complete a COVID Safety Plan for your business and have it available for inspection upon request by an authorised officer. If your business has multiple premises you must prepare a COVID Safety Plan for each premises.

You must also display a COVID Safety Plan Certificate in a prominent location visible to patrons. The certificate is provided at the end of the COVID Safety Plan template.

Hygiene training

The [AHA Hospitality & Tourism COVID-19 Hygiene Course](#) equips hospitality staff and management with a comprehensive understanding of COVID-19 hygiene requirements, helping prepare businesses to re-open safely and responsibly. Every staff member employed at a hospitality venue should complete the specialised COVID-19 hygiene-training course.

Any queries related to the course should be directed to:

Australian Hotels Association WA (AHA)

<http://www.ahawa.asn.au/>

Phone: (08) 9321 7701

Email: train@ahawa.asn.au

About COVID-19

COVID-19 is spread from person-to-person through close contact and droplets including:

- direct contact with infected people;
- contact with droplets from an infected person's cough or sneeze; and
- touching contaminated objects or surfaces (like doorknobs or tables), and then touching your mouth or face.

The most effective measures to prevent the spread of coronavirus are good hygiene practices, additional sanitisation regimes and social distancing.

As COVID-19 is spread person-to-person through coughing, sneezing, touching contaminated surfaces, and close contact with infected individuals, there is a need for food businesses to remain vigilant with cleaning and sanitising regimes and take extra care with maintaining and promoting safe food and hygiene practices throughout business operations.

The most effective measures are good hygiene practices, additional sanitisation regimes, social distancing and keeping away from others if unwell.

1. Physical and social distancing

Social distancing

Social distancing (also known as physical distancing) is one of the most effective methods of reducing the spread of viruses. The more space between you and others the harder it is for the virus to spread. If a person in the workplace is found to be positive for COVID-19, the risk of transmission to the rest of the workforce is minimised if the work place has been practising social distancing.

Good practice social distancing principles are to:

- maintain 1.5 metre separation between people who are not from the same household; and
- maintain a minimum of 4sqm per person.

Calculating maximum occupancy

Businesses must maintain a patron limit of:

- 20 dine-in patrons (excluding staff); and
- allow a minimum of 4sqm per person.

The application of the 4sqm per person may mean that less than 20 dine-in patrons can be accommodated. The maximum occupancy can be calculated by following these steps:

1. Measure the area accessible to the public.

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To find the square meterage for a rectangular area, multiply the length times the width. If there are adjoining areas or alcoves, measure them and calculate the square meterage. Add the results of each measurement together to find the total area in square metres.

Note: kitchen areas, staff only areas, toilets and areas occupied by fixed furniture such as counters and bars must not be included in this calculation.

2. Divide the total square meter area by 4 to give the maximum permissible number of patrons. Any establishment with a total area greater than 80sqm will be limited to 20 dine-in patrons.

Managing patrons entering the venue

It is recommended that businesses display the maximum number of patrons that can be present at any one time on the entrance door to clearly advise patrons of the number of people who can safely be in your business at any one time to allow for physical distancing.

Queues should be avoided as much as practicable. Where people do queue, such as at the entrance and service counter, provide markings on the floor 1.5m apart to show people where they should stand. Markings should be in bright colours or of a pattern that stands out. Procedures should be put in place to ensure these physical distancing measures are adhered to.

Venues should consider using easily visible signage urging patrons:

- not to enter the premises if they are unwell;
- to practise physical distancing within a group;
- avoid patrons crowding together in any one area of the business.

It is recommended that any patrons who appear to be unwell are requested to leave the premises.

Managing patrons at tables

There should be a minimum distance of 1.5m between each table of different groups of patrons. Tables should be arranged to maintain this requirement. Venue layout may need to be adjusted through the day to accommodate different sized groups and to ensure physical distancing principles can be followed.

Venues should provide groups with sufficient table space to enable physical distancing. Patrons are required to self-regulate their distancing at the table. There is no requirement for businesses to determine which patrons are from the same household and regulate physical distancing at the table.

Managing interaction between staff and patrons

In order to serve and interact with patrons, staff may need to move within 1.5m. In these situations, staff should avoid direct contact and minimise face to face time in order to reduce

the risk of transmission. If staff do come into direct contact with patrons, staff should follow good hygiene practices such as hand washing and cleaning.

Social distancing between staff

Businesses should ensure that staff stay at home if they are unwell.

In addition to practising good hygiene and cleanliness, the following approaches will minimise the risk of transmission of communicable diseases in the work place and to maximise continuity of business:

- consider reviewing shift arrangements to reduce interaction between staff – consider whether it is appropriate to create small staff teams and have the teams work separately from one another;
- social distancing during break times – maintain physical distancing when using lunch or dining room facilities or communal areas;
- maintain the social distancing protocol of 1.5m across the business as well as outside the workplace; and
- staff should consider getting an annual flu shot.

Barriers

In instances where social distancing may not always be possible, physical barriers like perspex screens may potentially reduce exposure between staff and the public. However, the effectiveness of such measures against COVID-19 is still not known. There may still be the potential for transmission, depending on the type of barriers introduced and other considerations such as air currents in the vicinity. Perspex screens may stop droplets landing on staff, but surfaces may still be contaminated. Therefore, these screens will be more effective when used in combination with good hand hygiene and regular cleaning.

2. Hygiene

Entrance to the food business

It is recommended that alcohol based hand sanitiser is provided for patrons at the entrance to the food business. Alternatively, a hands-free hand basin with liquid soap and paper towels should be supplied for customer use.

One-way traffic flow such as one dedicated entrance and another dedicated exit (where possible) can help minimise congestion.

Increased cleaning and sanitation regime

It is important to ensure thorough and regular cleaning of common contact surfaces, 'high touch' items and shared amenities, such as handles, taps, lunch rooms, EFTPOS keypads

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and toilets. It is recommended that the frequency of cleaning in all areas be increased. This is especially important in high traffic areas and any areas accessed by the public. If you think a surface may be contaminated, clean it with a common household disinfectant to kill the virus.

Cleaning products should be chosen that are approved for the surface to be cleaned. In general, combined detergent/disinfectant solutions or wipes are acceptable for hard surfaces. Some products such as bleach can damage fabrics, stainless steel and other surfaces. Businesses will have to continue to comply with any requirements regarding use of chemicals, including the use of Material Safety Data Sheets (MSDS) for chemicals utilised in the work place.

For most general cleaning tasks, a neutral detergent with pH between 6 and 8 should be used. The use of combined detergent / disinfectant wipes is acceptable, or solutions can be prepared fresh each day.

If using a bleach solution look for products which give you a 1000ppm (0.1%) bleach solution either neat or when diluted with water. Always follow the manufacturer's instructions if any detergent or disinfectant products require mixing with water or dissolving prior to use. Remember to never mix different cleaning products as in some instances toxic gases can be generated.

Refer to the [Environmental cleaning in the workplace factsheet](#) for further advice. **Disposable vs reusable cutlery, crockery, food and beverage containers**

There is currently no evidence to suggest there is any benefit in switching to disposable single use food and beverage containers, cutlery and crockery. A food business may continue to use standard containers, cutlery and crockery with appropriate hygiene, cleaning and sanitation processes in place. Dishwashers should be used where available.

Food businesses may continue to accept reusable cups and containers provided by the customer with appropriate hygiene and sanitation processes in place.

Self-service cutlery and condiments

Businesses should limit any unnecessary shared surface touching to avoid the risk of contamination. Staff should provide the required amount of cutlery to people on the table or have staff hand over cutlery and condiments.

Self-service areas like buffets, accommodation breakfast bars and aviation club lounges should be well supervised and require the customer to use hand sanitiser pre-commencement of service.

Areas must be regularly monitored and cleaning protocols adhered to.

Payments

Promote cashless payments.

After handling cash, ensure that hands are washed with soap and water, or a hand sanitiser is used.

Personal protective equipment

Good hygiene practices such as handwashing, cleaning and sanitisation of surfaces and utensils, social distancing and physical barriers are more effective measures for maintaining staff health and reducing the transmission of disease. There is currently no need to wear gloves or masks, other than as part of the business's normal food safety practices (such as handling ready to eat foods).

PPE may be worn, but can provide a false sense of security; to reduce the risk of transmission effectively, PPE must be used, worn and removed correctly. Some considerations when wearing PPE include:

- [PPE](#) needs to be applied and removed in the correct way. Training should be provided on the appropriate ways to apply and remove PPE to reduce the risk of cross – contamination;
- PPE is only effective if correctly worn/out on, not touched during wearing and changed when it becomes damp or soiled;
- The type of PPE available to the non-healthcare settings may not be appropriate;
- Wearing PPE may create Occupational Health and Safety issues as wearing some types of PPE for long periods is exhausting and cumbersome; and
- PPE for long periods is not always practical.

Preventing Legionella

If a property is unoccupied for even a couple of weeks, this provides a good opportunity for legionella bacteria to multiply in the buildings water systems – sometimes to dangerous levels. It is recommended that each tap and water outlet should be opened and left to run through for at least five minutes.

3. Staff training and education

In addition to any existing requirements for staff information and training under occupational health and safety laws, all staff should complete the [AHA Hospitality & Tourism COVID-19 Hygiene Course. This course is intended](#) to equip hospitality staff and management with a comprehensive understanding of COVID-19 hygiene requirements, helping prepare businesses to re-open safely and responsibly.

4. Compliance with existing legislation and regulations

In addition to the legal obligations arising from the Emergency Management Act and the Directions made under that Act, food businesses will continue to have obligations under existing legislation and regulations, including obligations under food and liquor legislation, as well as Worksafe legislation.

Some information regarding some of the existing conditions for the sale of food and liquor are provided below, for reference.

Compliance with the Food Act 2008

To ensure food for sale is both safe and suitable, all food businesses operating in WA must continue to comply with the:

- [Food Act 2008 \(Food Act\)](#)
- [Food Regulations 2009](#) and
- [Australia and New Zealand Food Standards Code \(the Code\)](#)

However, there are some additional practices that will enhance these procedures, particularly in relation to managing staff risks.

Food handler hygiene

Food handlers and other staff must maintain strict requirements around their health and hygiene. Staff should:

- wash their hands frequently when preparing foods, after going to the bathroom, after handling money and after touching the face or hair by handwashing with soap under warm running water for more than 20 seconds;
- thoroughly dry hands and use a single use towel to reduce transfer of pathogens to the hand and subsequently to the food or food equipment;
- avoid touching the eyes, mouth and nose;
- avoid touching areas that have been in direct contact with a customer and wash their hands after touching areas/items that patrons have had contact with.

Any staff with a suspected communicable disease (such as coughing, sneezing, flu-like or fever symptoms) must be excluded from the workplace. Send any sick staff home immediately and encourage them to get tested for COVID-19. Failure to exclude sick staff from the workplace may increase your legal liability in the event that a patron contracts COVID-19.

Food Handling

As there is currently no evidence that COVID-19 is transmitted through food or prepared food products, there is a low likelihood of catching COVID-19 from food packaging that has been moved, travelled and exposed to different conditions and temperatures. The probability of an infected person contaminating commercial goods is also low. Additional information on

COVID-19 and Food Safety can be found on the [Food Standards Australia & New Zealand \(FSANZ\)](https://www.foodstandards.gov.au/) website. There are no specific additional food safety handling measures required.

Takeaway services

Food businesses offering takeaway services should comply with all applicable laws, including the legislation set out above and Standards 3.2.2 and 3.2.3 of the Code. Food businesses should provide information to the customer on what they need to do to ensure that takeaway remains safe to eat once it has been delivered. For example: for immediate consumption, whether is it safe to reheat or freeze and how to do this, how to defrost and reheat.

Suggested COVID-19 precautions for takeaway services:

- patrons must be encouraged to sanitise their hands upon arrival at the premises. It is recommended that hand sanitiser is placed at the entrance with a sign asking patrons to use it before entering;
- businesses should try and encourage your patrons to order online or by telephone;
- patrons could have staggered collection times – signage may be used to discourage patrons from entering the premises until their order is ready;
- patrons whose orders are ready could enter one at a time to collect orders and make payments;
- encourage non-cash payments and designate a low risk area for hand-over of the food. This should be well away from the kitchen and at a distance from as many staff as possible; and
- businesses should try and discourage crowding outside the premises. Where possible, use queue management systems and social distancing practices to maintain the 1.5 metres separation.

Delivery services

When you are transporting food, you need to consider two main food safety issues:

- keeping the food protected from contamination.

It is always important to protect food from contamination by keeping it covered. You should use food grade packaging. Please note that the World Health Organization advises that the likelihood of an infected person contaminating commercial goods is low. The risk of catching the virus that causes COVID-19 from a package that has been moved, travelled, and exposed to different conditions and temperature is also very low. While food packaging is not known to present a specific risk, efforts should be made to ensure it is cleaned and handled in line with usual food safety practices as given in the Code.

- keeping it cold (5°C or colder) or hot (60°C or hotter) if the food is potentially hazardous.

When potentially hazardous foods are transported, they should be kept cold (5°C or colder) or hot (60°C or hotter) during the journey. Alternatively, you could use time, rather than temperature, to keep the food safe while it is being transported. More information is available on the [FSANZ temperature control factsheet](#).

Ensure that appropriately insulated containers are used when you need to keep food hot or cold. These carriers should be easy to clean and disinfect. You should ensure to disinfect food delivery containers internally and externally. Effective disinfection could be done at the start of the day, before carrying food and after deliveries, as well as regularly throughout the day. More information is available on the [FSANZ transporting food factsheet](#).

Cleaning products

Chlorine-based disinfectants are effective for environmental cleaning and are the most commonly used. Other disinfectant products may also be effective at killing the virus. A list of effective disinfectants for use against coronavirus can be found on the [United States Environmental Protection Agency \(USEPA\) website](#). Contact time and dilution factors are important considerations for ensuring effective disinfection.

Bleach solutions should be made fresh daily as they become less effective over time.

The recommended concentration of available chlorine for routine disinfection of cleaned surfaces is 1000ppm as this concentration has been shown to be effective against the majority of microbial pathogens.

Cleaning chemicals should never be mixed together. The Material Safety Data Sheets (MSDS) and the manufacturers guidelines should always be followed.

Care should also be taken to ensure that the cleaning agent is appropriate for the item to be cleaned, for example, bleach may not be appropriate for some fabrics as it may damage the material.

Rubbish disposal

The risk of transmission of COVID-19 when handling waste is low. Normal collection of waste for households, retail and other businesses continues.

When managing waste, good hygiene practices should be followed:

- Disposable gloves, masks, and other items should be placed in a rubbish bag before disposing of them with other domestic waste.
- Hands should be washed with soap and running water or rubbed with an alcohol-based hand rub immediately after handling these items.

Help complying with the food legislation

For help with how to achieve compliance with the *Food Act 2008* you could consider engaging a food safety consultant with a strong background in food product development and compliance with the food legislation, and/or seek your own legal advice. Please contact your [local government](#) environmental health officer for further information on the food regulatory requirements.

Local government environmental health officers have extensive experience and continue to have an important role with food premises. Local government environmental health officers will assist Food businesses with education, information and where necessary, report to WA Police regarding breaches of COVID-19 Food business conditions.

Compliance with the Liquor Control Act 1988

The *Liquor Control Act 1988* continues to be the overarching guiding legislation for service of alcohol. During this period, all operating venues serving liquor are required to serve liquor ancillary to a meal. This is in order to manage the safety of the community at this time. On all other matters, licensees must adhere to conditions set under their licence. Licensed venues are primarily being considered as Food businesses during Stage 2, regardless of licence category.

Whilst a “meal” is defined under the *Liquor Control Act 1988*, a venue-regulated approach to responsible service will be encouraged at this time. Licensees are expected to ensure that food served to patrons is substantial to the extent that a patron is not reasonably expected to become intoxicated consuming the food to alcohol ratio served.

More detailed guidance on the service of alcohol will be provided by the Department of Local Government, Sport and Cultural Industries.

As per usual liquor laws, any licensee who serves a juvenile or an intoxicated person or serves a person to the point of intoxication will be held liable. In the current environment, this is likely to mean forced closure until further notice.

5. Response planning

The following measures are important to minimise further risk and assist in managing the public health response if someone with possible COVID-19 infection enters your premises. All public health advice and instructions must be followed in the event of a confirmed case.

Maintain attendance records

It is a requirement for businesses to maintain attendance records of patrons. This will assist Public Health with contact tracing in the event of a positive COVID-19 case in your premises:

- Records can be physical (i.e. secure sign-in book managed by staff) or electronic but as a minimum must include a name and contact information for each patron (e.g. phone number or email)
- Records are required for dine-in patrons only (not required for takeaway)
- Records must not be used for purposes other than contact tracing (i.e. contact information is not to be used for marketing purposes)

Businesses should implement a process consistent with any privacy obligations they have for obtaining and safely maintaining these records of patronage for the purposes of assisting with contact tracing if needed.

Responding to a COVID-19 incident

If you are aware that someone with a case of COVID-19 has been in your workplace, ring the COVID-19 Public Hotline 24/7 on 1800 020 080 and follow the advice of health officials.

If someone is confirmed as having COVID-19 or is getting tested for COVID-19, they should already be at home. However, there may be circumstances where a person in your workplace is displaying COVID-like symptoms or shares information (e.g. they have been in close contact with someone that has the virus) that causes you to have reasonable concerns about their health and the health of others in your workplace.

The person could be a staff member, a client, customer or other visitor to your premises. Where this occurs:

1. Keep others away from the person

If the person has serious symptoms such as difficulty breathing, call 000 for urgent medical help. Otherwise, you must take steps to prevent the person from potentially spreading the virus by keeping others away from the person. The measures must be reasonable.

2. Seek advice and assess the risks

To determine if it is reasonable to suspect the person may have COVID-19, talk to the person about your concerns and seek government health advice where necessary.

3. Transport

Ensure the person has safe transport home, to a location where they can isolate, or to a medical facility if necessary.

4. Clean and disinfect

Follow all public health advice about closing off affected areas and preventing access until they have been cleaned and disinfected. Open outside doors and windows if possible to increase air flow.

5. Assisting public health to identify close contacts

Notify the state public health unit by contacting the COVID-19 Public Hotline 24/7 on 1800 020 080. The state public health unit may ask for your attendance records to identify close contacts of a confirmed COVID-19 case so that they can contact them and provide them with instructions, for example, in relation to quarantine requirements. Public health officers have a range of powers to require you to provide information including personal information. In the meantime, for the purposes of undertaking a workplace risk assessment and to assist your state and territory public health unit, consider who the affected person may have had recent close contact with.

Review risk assessment

If there is concern about the risk of staff being exposed to the virus at work, a risk assessment should be carried out with reference to the latest information available. Employers should develop prevention and control strategies appropriate to the workplace, in consultation with their staff, and ensure that all staff are aware of and follow these strategies.

Regularly review your COVID-19 risk management controls, in consultation with your staff and their representatives and assess and decide whether any changes or additional control measures are required. Consider having regular discussions about safety and health issues, for example during staff meetings, or by setting up a safety committee.

Key contacts

- 13COVID: For information about coronavirus measures and restrictions, and what they mean for you.
- COVID-19 Public Hotline 24/7: 1800 020 080: If you suspect you, a staff member, or a customer may have COVID-19 coronavirus symptoms or may have had close contact with a person who has COVID-19 coronavirus.

Further information

- Dedicated Police Number: 131 444
- Coronavirus - public information: www.healthywa.wa.gov.au/Articles/A_E/Coronavirus
- COVID-19 industry information: www.health.wa.gov.au
- Resources on social distancing:
<https://www.health.gov.au/resources/publications/coronavirus-covid-19-keeping-your-distance>
<https://www.health.gov.au/resources/videos/coronavirus-video-social-distancing>
- Further information about COVID-19 and food safety can be found on the [Food Standards website](#).
- Read more about the [practices and principles for food businesses to reduce the risks of COVID-19 impacts in their workplace](#)
- Occupational safety and health information is available on the WorkSafe website www.dmirs.wa.gov.au

Additional resources

[How to Handwash poster](#) – World Health Organization

[How to Handrub poster](#) – World Health Organization

[Keeping Your Distance poster](#) – Australian Government

[Change of Business Hours poster](#) – Australian Government

[COVID-19 information for business, industry and local government](#) – WA Department of Health

APPENDIX A – Checklist: Items to consider prior to reopening a business or venue

1. Physical distancing

- ☐ Physical distancing. Numbers will be limited to 1 person per 4sqm or 20 people, whichever is lowest in enclosed spaces.
 - Have you calculated the total area of the public areas and determined the maximum number of patrons permitted?
 - Is the furniture arranged to maintain 1.5 metre physical distance between each person?
 - Are there physical distancing markers on the floor in areas where customers queue?
- ☐ Social distancing
 - Consider how you will manage staff in enclosed areas, are there any issues regarding staff numbers in staff areas?
 - Identify all situations, tasks and processes where staff and others interact closely with each other and modify where possible
 - Put in place measures to communicate and remind staff of the need to practise physical distancing
 - Review shift arrangements to reduce interaction between staff
 - Ensure social distancing is maintained during break times.

2. Hygiene

- ☐ Good hygiene
 - Are adequate hand washing and hand sanitising stations provided? Check hand washing facilities are in good working order and adequately stocked (soap, hot water, paper towel, hand sanitiser)
 - Has signage about hand hygiene been provided?
 - Are processes in place to regularly monitor and review hygiene stations/measures?
- ☐ Cleaning and sanitisation
 - Has the cleaning frequency in any areas accessed by the public been determined?
 - Ensure thorough and regular cleaning of common surfaces, 'high touch' items and shared amenities e.g. handles, tables, chairs and toilets.
 - Have communal items been removed where possible? e.g. self-serve stations (cutlery, water, condiments).
 - Ensure your business has the appropriate cleaning products and equipment to perform cleaning and disinfection (detergent, disinfectant, food grade sanitiser, PPE where appropriate)
 - All contact surfaces that encounter food must be effectively cleaned and sanitised
 - Instruct staff to clean personal property.

Training and education

- ☐ Consider what guidelines and resources should be provided to staff
- ☐ Where appropriate, support staff to complete training
- ☐ AHA Hospitality & Tourism COVID-19 Hygiene Course
 - Ensure all staff complete the first component of the course

Compliance with existing legislation and regulations

- ☐ Continue to meet obligations under existing legislation

Response planning

- ☐ Monitor symptoms
 - Put up signs about the symptoms of COVID-19 in the work place
 - Direct staff to stay home if they are sick
 - Instruct staff to disclose if they have been in close contact with a person who has or is being tested for COVID-19
- ☐ Contact tracing
 - Maintain booking records of patrons for the purposes of contact tracing.
 - Maintain a record of staff working on the premises.
- ☐ Incident Response
 - Have written instructions for staff responding to a COVID-19 related incident