Northern Ireland Food Industry Guidance : Best Practice Covid-19

The following guidance aims to provide support and consistency for the Food Manufacturers of Northern Ireland. It takes the advice from Public Health England and practical experience from local food manufacturers to identify practical ways in which mitigations may be employed in order to keep our employees safe whilst continuing to 'Feed the Nation'. It should be used in a manner appropriate for the nature and scale of each food manufacturing business.

This guidance is approved by Northern Ireland Food & Drink Association (NIFDA)

With thanks to the following organisations for their contribution:

ABP

Allied Bakeries

Dale Farm Ltd

Devenish Nutrition Ltd

Irwin's Bakery

Karro Food Group

Mash Direct

Moy Park Ltd

Pritchitts (A Lakeland Dairies Company)

The following guidance reflects good manufacturing practice only, which is based on and remains subject to changes from time to time to the UK government's response to Covid-19 and guidance published by Public Health England. Each manufacturer is singly responsible for remaining fully informed about current best practice and for always exercising judgement in its workers' interests and welfare before adopting any guidance in its own business.

Contents

Overall Approach

Covid-19 is a primarily acquired in the community, it is a community disease. It is not an occupational disease, although under certain circumstances it can spread within the work environment.

There are four broad approaches to minimising risk within the work environment:

1) Keep the disease out - have systems and procedures in place to keep symptomatic people and those sharing accommodation with symptomatic people off site.

2) Reduce the risk of transmission within the site, minimising the spread within site from asymptomatic and presymptomatic people by
    a. social distancing where possible, and, where the social distancing guidelines cannot be followed in full, taking all the mitigating actions possible to reduce the risk of transmission between their staff
    b. implementing and enforcing good hygiene practices such as increasing the frequency of hand washing and surface cleaning

Social distancing and effective hygiene practices are essential.

3) Manage those occasions where personnel have symptoms or are tested positive

4) Protecting Clinically Extremely Vulnerable people / Clinically Vulnerable people – refer to Government guidance on working safely, section 2.

All of the above should be structured into a workplace risk assessment, with the site identifying risks and how they plan to mitigate these risks. The scope of the risk assessment should consider all parts of the site: entrances, processing, storage, offices, workshops, staff restaurants, staff facilities, etc. The sections below identify some of the potential risks and mitigations which should be considered, though every business is different, and there will be different considerations and different opportunities in different circumstances.

There is no one action which controls the spread of the disease. It is a multiple hurdle approach with different control measures contributing to minimising the risk.

On 11th May the UK government issued guidance for employers, employees and the self-employed on working safely during COVID-19 in factories, plants and warehouses and in offices and contact centres at https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19 .

Note: Government guidance can change regularly and without notification, so you should check the relevant websites frequently to ensure you are up to date with current thinking. See reference section.

External Parties

Non-essential external visits should be prohibited … if business will continue safely without the external party being on site, then the visit should be prohibited.

The number of business-critical visitors on site at any one time should be limited to reduce interaction and overlap between people.

A record of all visitors should be maintained.

The site workplace risk assessment should be available to visitors and the social distancing and hygiene rules must be available and explained.

Visitors to site should be screened. A simple check for the three key symptoms; high temperature (fever), a new, persistent cough, and loss of taste and smell will indicate whether they should be allowed to meet with site staff to hand over goods etc. Where delivery drivers are not getting out of their vehicle this may not be considered necessary.

Establish pre-defined routes for delivery drivers such that contact with staff is minimised.

Businesses should encourage meetings via remote connection or remote working for visitors where this is an option.

Certification bodies and customers are now adapting to not being able to be present on site to audit and are introducing remote auditing.

Challenge your ability to deal with this, in terms of connectivity in the depth of a factory, and maybe hold a practice run to help people feel more comfortable with the new approach.

Ensure that third party video streaming auditing complies with your company's GDPR and IT security rules. Be aware of the challenges where contracted independent third party auditors are using their own, non-business controlled computers to remote audit.

Ensure you obtain guidance from the auditing body ahead of the audit (e.g. BRC Global foods guidance) so that you know what is required, can prepare for this, and ensure you show your business at its best.

Communications

Our teams need clear communication at this time, and reassurance that they are working in one of the industries where standard practices already afford them significant protection against this virus. Our regular routines of handwashing, sanitising and regular cleaning align perfectly with keeping the virus at bay… but we need to be reinforcing this.

Employees in the food industry are considered essential workers and Covid 19 testing is available. Ensure workers know how to access this should they need to.

As well as providing clear instructions for their safe use and limitations, it is important to explain the reasons for putting up/not putting up perspex screens, back to back or side to side working, for asking people to wear/not wear face coverings/masks or visors. Whilst these can be beneficial controls in many situations, in others they may cause more problems than they solve; this needs to be explained.

Provide all personnel with clear instructions of what to do in relation to Covid-19.

- If you, someone in your household, or someone you have been in close contact with, has Covid-19 symptoms, a new, persistent cough, or high temperature (fever), or loss of taste or smell, or has been tested positive, do not come to work. Contact the employer using the designated, remote method and book a test.
- If you develop symptoms whilst at work, or become aware that someone in your household, or with whom you have close contact, had developed symptoms, alert your manager immediately.

We require clear communication of any changes in practice required to support our efforts to minimise the risk of transfer. It is important that people understand the reasons for the changes - if

they buy into the reasoning, they are more likely to change their behaviour. Understanding and compliance should be checked and confirmed.

The clocking in area is a good opportunity for a manager to remind all that if they have a cough or high temperature or loss of taste and smell they should say so. This may be done with posters, or personally, or both.

You should share a copy of your Covid 19 risk assessment with your workforce and display a copy of the HM Gov 'Staying Covid Secure in 2020' poster to show you are complying with the Gov. Guidance Document.

Communication should be ongoing and changing in delivery, to avoid complacency.

Personnel Movement On, and Between, Sites

All non-essential movement between sites should cease … if business will continue without the movement, then no movement. Temporary personnel should be dedicated to one site.

Minimise movements between areas and shifts to keep the same group of people working together and reduce interactions between groups: Consider how movement around a site and between different production areas could be reduced. Could a slightly different workflow avoid the need to move something from A to B to C, which could in turn reduce opportunities for virus transfer?

Could one person carry out all the movements of goods between two areas rather than several people all doing this?

Are there unnecessary doors in the way each of which has to be handled to open it; if they don't need to be closed could they be wedged open to reduce touch points?

Alternatives to touch-based security devices should be considered, such as keypads or fitting cleanable covers and ensuring regular sanitation of these.

Social Distancing

Where possible and practical, personnel should be asked to work from home – particularly relevant for office workers. This has the added benefit of reducing the number, and hence risk, to those remaining on site.

Consider measures to enable 2m social distancing in the following situations:

1. Travel to work
2. Moving around the workplace
3. Workstations
4. Common Areas
5. Accidents and incidents, first aid rooms

Clocking in areas can lead to personnel in close proximity. Can start/finish times be staggered to avoid a rush? Consider lines on the ground every 2m to encourage appropriate levels of distancing. Allow a buffer area to avoid close congregation of personnel.

Where lines are arranged such that personnel are working more closely together than the suggested 2m, this should be reviewed and necessary mitigation steps introduced where possible. Consider time segregation, running line slower for longer, or physical segregation, e.g. Perspex panels to segregate workstations (remember, they need to be cleanable).

Factory canteens are a key opportunity for personnel to congregate and invade social distancing. Consider staggering breaks, providing additional space to allow personnel to spread out more or taking breaks in personal cars.

Changing areas can also lead to clustering of people; could PPE be laid out for people to provide quicker, easier access, or could locker blocks be reorganised?

For common areas (canteens and locker rooms) a one-way flow of traffic can minimise close proximity.

Review smoking areas. Can smoke breaks be staggered? Can smoke areas be extended? Do we need to mark 2m spacings on the ground?

Consider how social distancing will be implemented in offices. This could require limiting the number of people per office, changing the layout of desks, adding screens between desks.

Whilst the business may not be responsible for travel to and from work, this may present a challenge in terms of social distancing; current PHE guidelines should be consulted and employees advised accordingly.

Share workstations with the smallest number of people and ensure sanitation of common touch points.

Work side-by-side or back-to-back rather than face-to-face.

Hygiene/Sanitation

Refer to Government Guidance: Cleaning in Non-healthcare Settings.

Ensure you have cleaning and sanitising chemicals which are certified as effective against enveloped viruses. EN 14476 is the standard for Chemical disinfectants and antiseptics effective against viruses. If your chemical does not have this certification, ask for validation for effectiveness against viruses.

There are a number of new suppliers and new products in response to the pandemic; lack of certification does not necessarily mean they are not acceptable. Public Health England has advised that hand sanitisers should have 60% or higher alcohol content to be effective against the COVID-19 virus. WHO provide guidance on suitable manufacture; your supplier should be familiar with hygienic manufacturing and able to provide a specification/recipe.

Ensure personnel are trained to wash their hands for the required 20 seconds with soap and water; this is more effective than relying on sanitiser. Monitor to ensure this is happening. It should be socially unacceptable not to carry out this task sufficiently.

Identify key touch points (door handles, keypads, vending machines, etc) and ensure these are being cleaned and sanitised frequently.

Clean desk policy should be implemented and rigorously enforced including the use of viricidal cleaner plus removal of waste and belongings each day. Additional waste facilities should be available throughout premises and more frequent collection should be carried out.

Identify 'common areas' where there might be a high level of cross over, for example canteen areas; these areas should ideally be cleaned with a viricidal cleaner between different groups of personnel.

Ensure your First Aid protocol is suitable for today's environment. If possible, avoid physical contact with the patient, if not, ensure you wash your hands for 20 seconds minimum after being in contact. If the patient is thought to potentially have Covid-19, all surfaces in the area must be cleaned using a viricidal cleaning solution in accordance with manufacturers' instructions.

Product Complexity

Reduction of product complexity may help to reduce man hours required and hence allow for more social distancing. Less complex products might require less people on-line, or even less lines running, whilst still supplying the same overall volumes. As restrictions, labour availability and market conditions change, the modification of product range could be discussed with customers who are likely to want to work with you in these trying times to agree the best outcome… talk to them.

Personnel Training & Deployment

Consider where there are a limited number of personnel with specific skills; if possible, these should be segregated into groups such that if one group becomes ill there is a back-up group with the relevant skills to take over. If not possible, contact should happen between the same personnel to reduce the number of contacts amongst staff.

Where equipment or items have to be transferred from person to person e.g. tools, paperwork, raw materials, etc. alternate ways should be established to eliminate direct contact such as a drop off point (e.g. pigeon holes for paperwork, sanitising of equipment pre and post handling, etc.).

Consider where it would be beneficial to have multiskilling to cover for future absences. Ensure people are competent in roles they might need to cover.

A quick but sound induction into food hygiene is required to facilitate an increase in recruitment from non-food areas to backfill gaps left by illness or self-isolation.

This is a good opportunity to consider what process control checks are done that are no longer necessary or add little value. Reduction of checks might make it easier to back fill a role. Consider what tasks you would choose not to do if tomorrow your manning level was, for example, 20% down. Choosing today will avoid the panic tomorrow.

Review refresher training; consider a dispensation to facilitate a more drawn out process.

Where possible training materials should be prepared in advance and communicated out to staff, particularly if these include updated procedures for arrival on site.

Consider the adaptations which can be made to allow training to continue, whilst still observing social distancing. In classroom situations, what is the maximum number per room, and how could their time together be minimised? On the factory floor, consider if headsets should be used to avoid the need to be close to a trainee to communicate or the use of a visor.

Administration

A number of personnel will need to report that they have symptoms and are not sure whether they should attend work. A remote form of communication (e.g. a telephone line) should be made available so that they are not inclined to report to work, and instead remain at home, confirm they are unfit for work and receive guidance to self-isolate.

Return to work interviews/questionnaires must consider did the employee have Covid-19 symptoms, or were they exposed to someone who did. If so, it must be confirmed that the appropriate self-isolation period has been applied.

Consider where items, particularly sheets of paper, might be passed from one person to another. Delivery notes/goods received notes are typical example. Can this process be done electronically to avoid the need for contact?

Response to Suspect Case

If becoming unwell whilst at work, with high temperature, new, dry, continuous cough or loss of taste and smell, the colleague must be sent home and advised to follow the advice to stay at home, contact their GP and book a test.

Employees should be reminded to wash their hands for 20 seconds more frequently and catch coughs and sneezes in tissues.

If a colleague is contacted whilst at work and advised they are a primary contact of a confirmed case, they should be sent home if the Tracer has advised them to do so - important to ensure the mitigating measures have been taken into consideration regarding the contact risk.

On identifying a 'presumed positive' case of Covid-19 on site, consideration must be given to the risk to others and the risk of contamination of the environment. Refer to Appendix 1, '*Response to Suspect Covid-19 Case on Site'* guidance for more detail.

If someone helps the ill person to leave site, there is no need for them too to be sent home, but they should wash their hands with soap for at least 20 seconds after touching the affected individual or their belongings.

It is not necessary to close the business or workplace or send any staff home, unless government policy changes.

Review

Positive cases and personnel self-isolating with symptoms should be kept under review. If there are two or more working in close proximity, consider whether this should be considered to be a cluster. If so, challenge your controls; how could cross contamination have occurred, and what can you do to further reduce the risk? This should be common sense precautions, just in case there was transmission whilst at work.

References

Note: Guidance can change regularly and without notification, so you should check the relevant websites frequently to ensure you are up to date with current thinking. See reference section.

Government: https://www.gov.uk/coronavirus

Health & Safety Executive(HSE): https://www.hse.gov.uk/news/coronavirus.htm

Revision History

Version	Issue Date	Section	Change
1	24/03/2020	All	First issue
2	Draft	Overall approach	New section
		External parties	Promoted to earlier section Limit number of visitors to site; keep log Site risk assessment to be made available to visitors; explain site controls/hygiene Encourage remote meetings rather than meet on site Delivery drivers excluded from health check if not leaving vehicle New paragraph on remote auditing
		Communications	Advise personnel testing is available Communicate reasons/logic for addition/lack of control measures Share workplace risk assessment with employees Communication should be ongoing to avoid complacency
		Personnel movement	Avoid movement between shifts Consider alternatives to touch-based security devices
		Social Distancing	Indication of 5 situations when to consider social distancing Suggested one way systems in common areas Implementation of social distancing in offices. Travel to work – see PHE guidance Sharing of workstations Work side-by-side or back-to-back rather than face-to-face
		Hygiene & Sanitation	Reference to Government Guidance: Cleaning in Non-healthcare Settings. Raised concern re efficacy of new hygiene products given rapid increase of supply Clear desk policy; increased waste disposal
		Product complexity	Keep under review as conditions change
		Personnel training and deployment	Care in handing over equipment/paperwork from one to another Dispensations for refresher training Where possible prepare training material in advance and send out to trainees Consider adaptations to traditional training methods to facilitate social distancing
		Review	New section
		References	New section

APPENDIX 1: Response to Suspect Covid-19 Case on Site

When to follow this protocol:

- A colleague develops one or more symptoms of Covid–19 whilst at work; symptoms are high temperature and / or new continuous cough, loss of taste and smell.

- A colleague is notified, whilst at work, that they have been identified as a primary contact

Note: if a colleague is ill at home, they should advise their employer and then follow existing government guidance and self-isolate.

Who to consider:

- The affected colleague

The person should be sent home immediately to self-isolate following government guidelines. If they require further guidance, they should phone NHS 111.

In progressing out of the production area, someone should be designated to walk in front of them to open doors, to avoid the affected person needing to touch doors.

On exit from the factory, they should be provided with two bin bags, one for disposable PPE (after disposing of PPE, tie the neck of the bag and drop it into another waste bag, so that nobody else will need to touch the outer of the first bag) and one for laundry (tie the neck of the bag and drop into dirty laundry container).

They should collect all their belongings from their locker, leaving locker open for sanitisation. Other personnel should be kept clear whilst the person changes out of PPE and uses their locker.

Again, doors should be opened for the person to help them leave the building.

If possible, employee should avoid using public transport to get home. If they do, they should keep a minimum of 2m away from others, cough /sneeze into a tissue and dispose of this and avoid touching all surfaces.

Ensure employee is aware of what they need to do next:

- Self isolation in accordance with Government rules

- Do not go to doctor/pharmacy/A&E

- If concerned, Contact NHS 111

- Book a test

- Keep in touch with employer to advise status

Best practice: provide a guidance leaflet to be clear on their next steps (i.e. self-isolation is going directly home, do not leave for 14 days, keep in touch with work so they are aware of status?)

- Close workers, typically those working on the same process/area of a processing line as the affected colleague, that is:

    – stationed within 2m of the affected individual
    – regularly within 2m of the affected individual
    – handling same equipment, potentially passing equipment from one to the other or using the same control panel(s)

    Close workers should be briefed, so they understand that their co-worker may not have been well. Their normal social distancing should have kept them safe. They should now leave the processing area, remove their protective clothing, wash and sanitise their hands and put on new/clean protective clothing.

Where to clean

Identify all surfaces which could realistically, potentially have become contaminated from the affected individual

    – particularly horizontal surfaces below face level
    – touch points – control panels, tool handles, keyboards, pens, clipboards, ingredient containers, etc

Wipe all surfaces thoroughly using a viricidal cleaning product diluted as advised by the manufacturer. (note : apply usual controls to avoid contaminating food product/packaging during this process

Facilities – consider which doors/facilities, including their own locker, the affected person may have touched. These must also be cleaned with a viricidal cleaning product

The following link gives UK Government advice on cleaning non-medical areas:

https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings/covid-19-decontamination-in-non-healthcare-settings

Note:

Above assumes the guidance given in Northern Ireland's Best Practice Covid-19 document has been implemented.