

Representation from Environmental Health (Food and Health & Safety)

From: Philip Wright

Sent: 14 October 2020 09:55

To: Environmental Health - Licensing <EnvironmentalHealth-Licensing@rother.gov.uk>;

Subject: Devonshire License Review - Covid 19 Risk Assessment

Dear Sir/Madam,

I am making a representation on behalf of the Food/Health & Safety Team, Env Health, Rother DC.

I recently contacted the license holder and DPS to request a copy of the current COVID risk assessment in use at the premises, I have attached a copy of the risk assessment returned by Mr Kapllani.

I have reviewed the risk assessment and note that the document originates from GPS food services, to help review the document I have considered the current HSE advice and guidance freely available on their website, the risk assessment provided follows many of the key points to consider highlighted by the HSE. However the risk assessment provided by Mr Kapllani appears to simply repeat generic steps that should be taken or considered rather than actually carrying out the steps to determine what is required at his premises.

For example the risk assessment states that the number of customers permitted inside the public house will be 75, having reviewed the bar and seating area plan for the Devonshire in light of current social distancing regulations this is not a feasible figure.

Phil Wright

Senior Environmental Health Officer
Environmental Health Service
for Rother and Wealden Councils

www.rother.gov.uk

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Environmental Health - a shared service for:



My working days are Monday to Friday

THE DEVONSHIRE BAR & LOUNGE

COVID-19 Restaurant Risk Assessment

Assessor/s	Organisation	Assessment Date	Review Dates
Simon Gordon	GPS Food Service Solutions	29 September 2020	
Artur Kapplani Sokol Kapplani	Bar/Restaurant Proprietor	29 September 2020	

Assessment Location

Retail Catering Staff, Admin Staff, Customers, Delivery Personnel

Persons at Risk

The risk assessment and controls/measures below have been put in place to evaluate the risk to staff, customers and delivery personnel in respect of the Coronavirus and to eliminate/reduce the potential for infected persons entering the premises, contamination of surfaces. Key changes are as follows ;

- ***Businesses selling food or drink (including cafes, bars, pubs and restaurants, must be closed between 10pm and 5am. This will include takeaways, but delivery services can continue after 10pm (from 24 September).***
- ***It is a compulsory requirement to prominently display the NHS Test and Trace QR Code poster in A4 size or larger. Customers should be encouraged to use it.***
- ***Customers in hospitality venues must wear face coverings, except when seated at a table to eat or drink***
- ***In licensed premises, food and drink must be ordered from, and served at, a table.***
- ***Customers must eat and drink at a table in any premises selling food and drink to consume on site (from 24 September).***
- ***Whether indoors or outdoors people from different households must not meet in groups of larger than 6. This limit does not apply to meetings of a single household group or support bubble where it consists of more than 6 people.***
- ***It is now compulsory for retail, leisure and hospitality staff to wear a face covering***

Where the social distancing guidelines cannot be followed in full, in relation to a particular activity, the business has considered whether that activity needs to continue for the business to operate, and if so, have taken all the mitigating actions possible to reduce the risk of transmission between their staff and customers.

Further mitigating actions include:

- Increasing the frequency of hand washing and surface cleaning.
- Keeping the work or task activity time involved as short as possible.
- Using screens or barriers to separate workers from each other and workers from customers at points of service.
- Table configuration done to enable 2m distances between tables or 1m with mitigation, with a capacity limit not to be exceeded
- 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).
- Finally, if people must work face-to-face for a sustained period with more than a small group of fixed partners, then the business will assess whether the activity can safely go ahead. No one is obliged to work in an unsafe work environment.

Factors Causing Spread of Virus	Existing Controls/Government Guidance	Further Control Measures
<p>Contact with infected persons</p> <p>(Personal, Protective Equipment) PPE and face coverings</p>	<p>All staff must provide each day before entering the premises/location, their confirmation of the COVID-19 Health Check Declaration.</p> <p>Ensure staff are fit to work and do not have a temperature over 37.5oC</p> <p>PPE is currently provided for food safety and health and safety purposes.</p> <p><i>It is now compulsory for retail, leisure and hospitality staff to wear a face covering in areas that are open to the public and where they come or are likely to come within close contact of a member of the public. This includes shops, supermarkets, bars, pubs, restaurants, cafes, banks, estate agents, post offices and the public areas of hotels and hostels.</i></p> <p><i>A face covering should:</i></p> <ul style="list-style-type: none"> • <i>cover your nose and mouth while allowing you to breathe comfortably</i> • <i>fit comfortably but securely against the side of the face</i> • <i>be secured to the head with ties or ear loops</i> • <i>be made of a material that you find to be comfortable and breathable, such as cotton</i> • <i>ideally include at least two layers of fabric (the World Health Organisation recommends three depending on the fabric used)</i> • <i>unless disposable, it should be able to be washed with other items of laundry according to fabric washing instructions and dried without causing the face covering to be damaged</i> 	<p>The Manager/Supervisor will check each staff member has completed the Declaration before they enter the premises and keep records of arrivals.</p> <p>The Manager/Supervisor will check individual staff temperatures on arrival for work at the premises. Staff will sign each day and manager/supervisor will ensure records are kept securely.</p> <p>Staff must now use a face covering, but must ensure they are continuing following the current guidance below</p> <ul style="list-style-type: none"> • Washing hands thoroughly with soap and water for 20 seconds or use hand sanitiser before putting a face covering on, and before and after removing it. • When wearing a face covering, avoid touching your face or face covering, as you could contaminate them with germs from your hands. • Change your face covering if it becomes damp or if you've touched it. • Continue to wash your hands regularly. • Change and wash your face covering daily. • If the material is washable, wash in line with manufacturer's instructions. If it's not washable, dispose of it carefully in your usual waste. • Practise social distancing wherever possible.
Overcrowding and congestion	Number of customers will be limited to 75 to provide for 2m or (1m with mitigation) social distancing throughout the	The maximum number of customers dining together that can be admitted to the restaurant is 75 internal seating area and 24

Factors Causing Spread of Virus	Existing Controls/Government Guidance	Further Control Measures
	restaurant (and outdoor selling areas)	external seating area, where applicable.
Proximity of Customers to Staff and other Customers	Social distancing measures of 2m or (1m with mitigation), should be maintained in all parts of the restaurant wherever possible. Customers who are accompanied by children will be reminded that they are responsible for supervising them at all times and should follow social distancing guidelines.	Information, signs and markings will be distributed where practical at the entrance and throughout the premises/location to promote social distancing and hygiene. Queue management measures have been established for those parts of the restaurant that are likely to get congested.
Proximity of Staff to other Staff	Social distancing measures of 2m (or 1m with mitigation), should be maintained in all parts of the restaurant and kitchen wherever possible.	Staff rotas agreed to ensure staffing levels are sufficient to manage customer traffic and enabling safe distancing for staff. Staff arrival and departure times should be staggered to reduce close contact in changing areas.
Contaminated and potential contaminated surfaces	The premises have been deep cleaned applying approved sanitisation and disinfectant products.	The premises will continue to be cleaned daily. Specific parts of the restaurant and kitchen will need further cleaning during working hours.
Contamination and potential contamination of surfaces	Hand sanitiser will be placed at various suitable locations in the workplace, as well as at the entrance. Customers will be encouraged to use them.	At intervals during the working day the availability of hand sanitiser will be checked and replenished. Staff should report any shortage of hand sanitisers to the Manager/Supervisor.
Action Required		
All measures to be reviewed in 2 weeks to ensure that staffing levels and social distance controls have been sufficient to manage customer numbers and customer flow through the shop, particularly in respect of congestion points.		Actioned By The Assessor Date
Workplace Premises		
Entrance - Staff	Controls/Guidance/Regulations Planning for the minimum number of people needed at the venue to operate safely and effectively.	Further Measures Staff Rota's will be planned to ensure the minimum number of staff are on-duty at the premises at anyone time. Staff will be asked to arrive and leave at scheduled intervals and not to visit the premises unless required to be there.

Workplace Premises	Controls/Guidance/Regulations	Further Measures
	<p>Staff should arrive in 10-15 minute intervals where practical and will be admitted individually to the Premises by the Manager/Supervisor. If staff do arrive together, they must enter changing areas one at a time.</p>	<p>The Manager/Supervisor will control entry whilst checking staff have completed the COVID-19 Health Check Declaration.</p> <p>Hand sanitisers are available by the entrance.</p>
Entrance/Exit - Customers	<p>Providing clear guidance on social distancing and hygiene to people on arrival, for example, signage, visual aids and before arrival, such as by phone, on the website or by email.</p> <p>It is a compulsory requirement to prominently display the NHS Test and Trace QR Code poster in A4 size or larger. Customers should be encouraged to use it.</p> <ol style="list-style-type: none"> 1. Ask 1 member of every party who visits your premises to provide their contact details to assist NHS Test and Trace. Refuse entry to those who refuse to provide contact details. 2. Have a system in place to ensure that you can collect that information from your customers and visitors, and provide this data to NHS Test and Trace, if it is requested. 3. Keep a record of all staff working on your premises and shift times on a given day and their contact details. 4. Display an official NHS QR code poster from 24 September 2020, so that customers and visitors can 'check-in' using this option as an alternative to providing their contact details. <p>A single staff member will set-up the external waiting boundary and check the floor-pavement social distance markings before restaurant opening.</p> <p>A staff member will be responsible for managing the flow of customers into the restaurant per the maximum 20 above.</p> <p>Ensure any changes to entrances, exits and queue management take into account reasonable adjustments for</p>	<p>Display in a prominent position signs and capacity limit information at entrance points where appropriate/if applicable at peak times.</p> <p>Encourage customers to book in advance. Keep a record of all customer names and where they are seated. Keep data secure to comply with GDPR regulations. (Further government guidance and/or regulations about the design of a system in line with data protection legislation, is expected shortly)</p> <p>Gloves should be used when handling the boundary props.</p> <p>Customers should be encouraged to use the hand sanitisers made available at the entrance.</p> <p>Once the maximum number of customers have entered the restaurant at 2m intervals a new customer(s) will only be admitted once a departing customer(s) has exited the premises by at least 2m.</p>

Workplace Premises	Controls/Guidance/Regulations	Further Measures
	<p>those who need them, including disabled customers. For example, maintaining pedestrian and parking access for disabled customers.</p> <p>Agreement with neighbouring restaurants/businesses to prevent overlapping of outside queues.</p>	
Restaurant walk through	<p>Customers in hospitality venues must wear face coverings, except when seated at a table to eat or drink.</p>	<p>Staff members will remind customers of social distancing, wearing a mask and to maintain social distancing as customers move through the restaurant where applicable.</p>
Restaurant Seating configuration and capacity limits	<p>The restaurant seating configuration will be based on the maximum number of customers that can reasonably follow social distancing guidelines 2m, (or 1m with mitigation where 2m is not viable, is acceptable).</p> <p>This configuration will take into account total indoor and outdoor space, specific venue characteristics such as furniture as well as likely pinch points and busy areas.</p> <p>To prevent the spread of the virus, from 14 September there are legal limits on how many people someone can spend time within a social group at any one time. Whether indoors or outdoors people from different households must not meet in groups of larger than 6. This limit does not apply to meetings of a single household group or support bubble where it consists of more than 6 people.</p>	<p>The maximum number will be displayed at entrance points to reassure customers entering and queuing to enter the premises.</p> <p>Manager/Supervisor will ensure limits are not exceeded and the agreed table configuration is adhered to at all time.</p> <p>When taking bookings ask customers for confirmation as such.</p> <p>When taking bookings ask customers for confirmation as such.</p>
Restaurant Service	<p>Maintaining social distancing (2m, or 1m with mitigation where 2m is not viable, is acceptable) from customers when taking orders from customers.</p> <p>Adjust service approaches to minimise staff contact with customers.</p> <p>Minimising customer self-service of food, cutlery and condiments to reduce risk of transmission.</p>	<p>Staff should be provided with a mask when taking orders if a 2m social distance cannot be adhered to. Alternative methods for taking orders will be considered.</p> <p>Where practical assigning a single staff member per table, if not ensure the number of staff serving a particular table is a minimal as possible.</p> <p>Unless already laid up on tables, cutlery and single service condiments will be provided only when food is served.</p>

Workplace Premises	Controls/Guidance/Regulations	Further Measures
	<p>Single use printed menus will be considered. Use the same menu at each table so not passed between multiple customers.</p> <p>Contact between kitchen workers and front of house workers will be minimised.</p> <p>Establish a routine for the cleaning and sanitising of each table/chairs and table items between use.</p> <p>Encouraging contactless payments where possible and adjusting location of card readers to social distancing guidelines (2m, or 1m with risk mitigation where 2m is not viable, is acceptable).</p>	<p>After use, single use menu's will be discarded. Re-useable menu's to be sanitised between use.</p> <p>Collection of food at the service area will be limited to one server at a time. Front of house staff will not be permitted to pass through the kitchen. If there is a need to pass through the kitchen, FOH staff must wear a mask or face covering.</p> <p>Nominate only one person on shift to routinely clean tables between use. This person must wear a disposable apron, gloves and optional face covering.</p> <p>Ensure card readers are handled by as few people as possible and ensure they are sanitised between use. Offer customers hand sanitiser to use after using card readers.</p>
Backroom Office	A maximum of only one person can use the backroom office at any one time to maintain social distancing.	Communal equipment such as keyboards, mouse, printers, photo copiers will be cleaned immediately after use by the user. Hand sanitisers will be available by the door.
Storeroom	With limited open space in the storeroom access should be restricted to only one member of staff at any one time unless for safety and manual handling considerations a second member of staff is required.	Where 2 staff members are necessary, they should try to work side by side rather than face on, and consistent work partnerships should be established for any shared tasks.
Kitchen	<p>Only authorised kitchen personnel can use the kitchen at any one time.</p> <ul style="list-style-type: none"> • Allow kitchen access to as few people as possible. • Minimising interaction between kitchen staff and other workers, including when on breaks. • Putting teams into shifts to restrict the number of workers interacting with each other. 	<p>Meal breaks will be staggered to avoid possible overcrowding.</p> <p>Staff should wash and clear away all utensils they use when they have finished with these.</p> <p>Kitchen surfaces to be cleaned regularly during use. A rota will be agreed to ensure this procedure</p>

Workplace Premises	Controls/Guidance/Regulations	Further Measures
	<ul style="list-style-type: none"> • <i>Spacing working areas to maintain social distancing guidelines (2m, or 1m with risk mitigation where 2m is not viable) as much as possible, recognising the difficulty of moving equipment such as sinks, hobs and ovens. Consider cleanable panels to separate working areas in larger kitchens.</i> • <i>Providing floor marking to signal social distancing (2m, or 1m with risk mitigation where 2m is not viable).</i> • <i>Using 'one way' traffic flows to minimise contact.</i> • <i>Minimising access to walk-in pantries, fridges and freezers, for example, with only one person being able to access these areas at one point in time.</i> • <i>Minimising contact at 'handover' points with other staff, such as when presenting food to serving staff and delivery drivers.</i> 	
Staff Toilets	<p>No more than one person can use the toilet facilities at any one time.</p> <p>Anyone waiting should stay 2m from the toilet facilities doors.</p> <p>Toilet facilities surfaces including door and flush handles to be cleaned regularly.</p>	<p>All staff must maintain hygiene standards per government guidelines in hand washing.</p> <p>Hand dryers or disposable hand towels to be available, as well as hand sanitisers.</p> <p>A visible cleaning schedule will be displayed and signed off at regular intervals can kept up to date.</p>
Customer Toilets	<p>No more than one person can use the toilet facilities at any one time.</p> <p>Anyone waiting should stay 2m from the toilet facilities doors.</p> <p>Toilet facilities surfaces including door and flush handles to be cleaned regularly.</p> <p>Signs and posters to build awareness of good handwashing</p>	<p>Hand dryers or disposable hand towels to be available, as well as hand sanitisers.</p> <p>A visible cleaning schedule will be displayed and signed off at regular intervals can kept up to date.</p> <p>Customer toilets will be routinely cleaned and checked approximately every 30 minutes</p>

Workplace Premises	Controls/Guidance/Regulations	Further Measures
	technique, the need to increase handwashing frequency and to avoid touching your face, and to cough or sneeze into a tissue which is binned safely, or into your arm if a tissue is not available.	
Action Required		Actioned By Date
	Congestion points, particularly the entrance and counter queue areas to be constantly reviewed.	The Assessor
Workplace Tasks	Controls	Further Measures
Deliveries to Restaurant	Deliveries will not be signed for (unless required for legal continuity) and will only be delivered to the Entrance. 2m social distancing should be maintained as far as practical.	If delivery must be signed for the signor should use their own pen and wear gloves when handling the signature sheet. Gloves are available for handling deliveries if requested by staff. If more than one member of staff is required to move the delivery to the storeroom, gloves & masks must be used by both staff members. This pair of staff should also continue to work together for any tasks that require more than one person in the storeroom. Any lifting or carrying equipment such as a trolley must be cleaned at the start and end of every day, as well as after use.
Processing payment at P.O.S.	Counter/till staff will wear gloves when handling and processing purchases.	
Stocking shelves and racks	As far as practical re-stocking should be carried out without working in pairs/teams.	Any lifting or carrying equipment such as a trolley must be cleaned at the start and end of every day, as well as after use.
Regular cleaning duties	Parts of the premises will be cleaned regularly throughout the day; counter, kitchen, toilets.	A daily rota will be put in place so that this responsibility is shared by all staff.
Accidents, security and other incidents	Incident and emergency procedures have been reviewed to ensure where practical social distancing principles can be maintained.	

Workplace Tasks	Controls	Further Measures
No other tasks which involve necessary sharing and/or proximity have been identified.	Staff are requested to bring to the Assessor's attention any such tasks they consider should be included in this risk assessment.	
Action Required		Actioned By
		Date

This report has been prepared for the account of The Devonshire Bar & Lounge. The above observations and recommendations reflect the assessor's best judgement in light of the information available at the time of preparation. Any use that a third party makes of this report, or reliance on, or any decisions to be made based on it, is the responsibility of the third party.

Assessor's Signature	Date
Approved by	Approver's Job Title
Approver's Signature:	Date: