

As you will likely be aware, the Government have recently advised the public to avoid pubs, clubs, theatres and other social venues due to the coronavirus (COVID-19) pandemic.

The Isle of Wight Council understand that businesses may look to change their business model and diversify in order to maintain their business during this time.

The following advice is for those businesses that are looking to make provision for takeaways and deliveries where they have not done so before.

Planning rules will be relaxed so pubs and restaurants can operate as hot food takeaways during the coronavirus outbreak, the Communities Secretary has confirmed <https://www.gov.uk/government/news/government-to-grant-permission-for-pubs-and-restaurants-to-operate-as-takeaways-as-part-of-coronavirus-response>. However, a business will only be in a position to do this if they are registered as a food business with a Local Authority.

Scientific advice is that it is very unlikely that COVID-19 can be spread through food, but, if you are changing how you are used to operating then you should think through the hazards and ensure that you have control measures in place to eliminate the risks.

Food Safety

All foods must be delivered to consumers in a way that ensures that they do not become unsafe or unfit to eat.

If businesses are registered then they do not need to inform us of the change however, you will need to review your HACCP (Hazard Analysis Critical Control Point) to ensure that the additional hazards (for example cross contamination and temperature control) associated with this business operation are considered and documented.

- So that those control points which are critical to food safety have been identified, and implemented.
- That measures to be taken in the event of a failure in control at those critical points are specified and management checks to verify the correct operation of procedures are made and recorded.

The Food Standards Agency (FSA) have provided advice for business – ‘How to manage a food business if you sell products online, for takeaway or for delivery.’ <https://www.food.gov.uk/business-guidance/distance-selling-mail-order-and-delivery>

Allergens

Allergens also need to be considered, as if food is sold at a distance (e.g. internet sales or home delivery), the allergen information must be provided:

- Before the purchase of the food is complete (this could be in writing or verbally) **AND**;
- In a written format when the food is delivered.

Additional information on allergens can be accessed through the FSA at <https://www.food.gov.uk/business-guidance/allergen-guidance-for-food-businesses>

Infection Control

You have responsibilities to ensure food handlers are fit for work under the food hygiene regulations and in addition you have a general duty to ensure the Health, Safety and Welfare of persons in your employment and members of the public.

Relevant staff must be provided with clear instructions on any infection control policy in place, and any person so affected and employed in a food business and who is likely to come into contact with food is to report immediately the illness or symptoms, and if possible their causes, to the food business operator.

The Government have issued guidance on COVID-19 for employees and businesses <https://www.gov.uk/government/publications/guidance-to-employers-and-businesses-about-covid-19>

However, this is not specific for food businesses, but it does advise that ‘if you have been asked to self-isolate, you can order by phone or online (and ideally payment is made this way), such as through takeaway services or online shopping deliveries. However, make sure you tell the delivery driver that the items are to be left outside, or as appropriate for your home’.

If you are undertaking deliveries, then you should have a system in place to ascertain/develop a system whereby clients can notify the restaurant/delivery drivers whether they are self-isolating so that action can be taken accordingly as highlighted above.

Licensing

Licensing departments have received several queries from licensed premises regarding how to responsibly utilise the 'off sales' element of their premises licence, in an effort to recoup lost income following this Government advice.

We understand the financial pressures that many premises will be experiencing at present, and therefore we would like to offer best practice advice to all licensed premises with regards to offering sales of alcohol for consumption off the premises, whether by means of takeaway or delivery service. It is essential that any premises wishing to operate in this way ensures that it is done so responsibly and safely. This advice has been formulated by Isle of Wight council's licensing department and Hampshire Constabulary's Licensing department.

Check the terms of your Premises Licence. Ensure that you are licensed for the supply of alcohol for consumption off the premises, and check that you have no restrictive conditions attached to your Premises Licence that would restrict your plans. If you have any difficulty understanding your Premises Licence, please contact the licensing authority.

Takeaway Food / Drink

- If you are offering takeaway drinks, please ensure that you consider offering alternatives to glass drinking vessels.
- You are still required to adhere to your age verification policy (e.g. Challenge 21/25) when supplying alcohol for consumption off the premises. Always request proof of age if you suspect that the person is underage.

Delivering Food / Drink

- If you are offering alcohol via delivery, there is an expectation that your delivery staff (whether these are your own staff members or a third party delivery company) have undertaken relevant training in the promotion of the licensing objectives and age verification.
- You must ensure that alcohol is delivered to a legitimate address, i.e. a recognisable dwelling or business address.
- You should keep a record of any alcohol deliveries. An example of how to record this is attached.
- Alcohol should not be delivered to a person who is drunk or disorderly, or delivered to an address where it is obvious that disorder or anti-social behaviour is occurring.
- Deliveries of alcohol must be handed to a person, not left outside the door, in a 'safe place' or elsewhere.
- Delivery staff must verify the age of the person who is accepting the delivery using acceptable identification, and record that they have checked the ID.

Contact

We would encourage licensed premises to contact Isle of Wight Council to discuss any queries or concerns that they have with regards to providing takeaway food/drink or delivered food/drink.

Licensing Department: licensing@iow.gov.uk

Environmental Health Department: eh@iow.gov.uk