



STEP SYSTEM – ENGLAND

STEP 4 GUIDANCE & FAQs

INTRODUCTION

On **Monday 19 July 2021**, England will enter Step 4, which removes the current Step 3 restrictions (including premises closures such as nightclubs).

This document is an interpretation of the information currently available as it pertains to hospitality, as we currently understand it.

Updated working safely guidance was published on 14 July. Businesses are required to manage the risks at their premises, by updating the risk assessment to include Covid-19 measures and ensuring that all relevant mitigations are in place. The guidance also includes recommendations which businesses may wish to consider as part of their operational plan from 19 July. The full guidance is available [here](#)

The relevant categories for your business can be found below:

- [*Restaurants, pubs, bars, nightclubs and takeaway services*](#)
- [*Hotels and guest accommodation*](#)
- [*The visitor economy*](#)

STEP 4 – 19 JULY

Hospitality

All closure restrictions for businesses will be lifted, including those closed under Step 3 such as nightclubs.

Business events/large events

All capacity caps and previous restrictions on larger events and gathering will be lifted in Step 4.

Your legal requirements

The working safely guidance has been updated to provide examples of mitigations that employers can take to reduce risk of COVID transmission in their workplaces. In particular it highlights six prioritised elements to consider:

1. Complete a health and safety risk assessment that includes the risk from COVID-19

2. Provide adequate ventilation
3. Clean more often
4. Turn away people with COVID-19 symptoms
5. Enable people to check in at your venue
6. Communicate and train

Employers should take account of this guidance in preparing the risk assessments they are already required to make under pre-pandemic health and safety rules.

Employers will still have a legal duty to manage risks to those affected by their business. The way to do this is to carry out a health and safety risk assessment, including the risk of Covid-19, and to take reasonable steps to mitigate the risks you identify. Working safely guidance sets out a range of mitigations employers should consider including:

- encouraging staff and customers to clean their hands regularly and providing facilities for them to do so
- cleaning surfaces that people touch regularly
- identifying poorly-ventilated areas in the venue and taking steps to improve fresh air flow
- ensuring that staff and customers who are unwell do not attend the workplace or venue
- communicating to staff and customers the measures you have put in place
- ⊖ reducing contact between people, particularly between customers and workers

Government recommendations to operators

- You must update your risk assessment as per the legal requirement in the working safely guidance listed above.
- Operators are encouraged to use outside space where practical, and to consider the supply of fresh air to indoor spaces. The scope for achieving adequate ventilation varies from setting to setting. This can be natural ventilation through windows, doors and vents, mechanical ventilation using fans and ducts, or a combination of both. [Read advice on air conditioning and ventilation from the Health and Safety Executive \(HSE\).](#)
- Businesses in higher risk settings, are encouraged to use the NHS COVID Pass as a condition of entry, particularly in large crowded settings where people are likely to be in close proximity to others outside their household. This can be achieved by a full vaccine course, a recent negative test, or proof of natural immunity, all through the NHS COVID Pass on the NHS app.
- Businesses are encouraged to display QR codes for customers to check in using the NHS COVID-19 app if they so wish although it will no longer be a legal requirement to either display a QR code or to collect customer contact details. If you do choose to display a QR code, you must also provide an alternative method for collecting details for those that are not using the NHS COVID-19 app.

- The legal requirements to wear a face covering will be lifted in all settings from 19 July. Government advice states that wearing a face covering is advisable in settings where you come into contact with people you do not normally meet in crowded places.
- If possible, a gradual return to the work place is recommended. More information on hybrid working is available [here](#).

STEP 4 – FAQs

Q. Will table service be required for food and drink consumed in indoor/outdoor areas of hospitality?

No. Venues will be able to reintroduce bar service and vertical consumption of drink and food.

Q. Do customers have to wear face coverings inside, and what are the staff requirements?

No. The legal requirements to wear a face covering will be lifted in all settings from 19 July – you are free to make decisions based on your individual premises, to include in your risk assessment. Customers may still choose to wear face coverings. Employers are asked to support staff that choose to wear face coverings.

Q. What are the requirements for ventilation indoors?

Adequate ventilation remains important. The Government’s workplace guidance advises that “this means supplying fresh air to enclosed space where people are present. This can be natural ventilation through windows, doors and vents, mechanical ventilation using fans and ducts, or a combination of both.” For most venues, natural ventilation using windows, doors and vents is likely to be sufficient. There are no mandated technical requirements for airflow in the guidance. The guidance includes advice on how to use CO2 monitors as a means of identifying any poorly ventilated areas.

Q. What are the Test and Trace requirements?

The requirement to display QR codes and collect customer data will be removed from 19 July. Data collected ahead of that point must still be kept for 21 days. You may wish to continue using the test and trace venue check in system after 19 July. If you do choose to continue displaying a NHS QR code, you must also provide an alternative method for collecting details for those that are not using the NHS COVID-19 app

Q. Who is allowed to meet indoors/outdoors at my venue at Step 4?

Any number of people can meet. Groups caps are lifted at Step 4.

Q. What are the wedding/reception/funeral/wake rules from 19 July?

Restrictions on all of these events have been lifted as of 19 July.

Q. Can live/recorded music performances/dancing/singing take place indoors at Step 4?

Yes.

Q. What are the rules around larger scale events?

Restrictions around all events has been lifted at Step 4.

Q. Can gaming machines and other games (e.g. pool/snooker) be used?

Yes.

Q: Can customers order and pay at the counter?

Yes.

Q. What are the rules around carveries and buffets?

All restrictions on carveries, buffets etc. are lifted at Step 4.

NHS COVID-19 APP

Summary

- There is a legal difference between a self-isolation notification received via the NHS Covid-19 app, and a self-isolation requirement received via direct NHS tracing contact via email, text or phone call. Details are outlined below.
- The NHS COVID-19 app is downloaded by the user (staff member or customer) on to their phone and uses Bluetooth to anonymously track close contacts.
- If an app user then inputs that they have tested positive for Covid-19, the app will alert other phones, arising from a close Bluetooth connection with someone who has tested positive. This is why there is a recommendation to turn off contact tracing if working in a protected environment i.e. behind a screen and/or a recommendation to leave phones in lockers with the app paused (see section below). Individuals will continue to be protected as a case associated with a venue will result in a formal (mandatory) test and trace notification and mandatory self-isolation.
- There is no requirement for staff to check in on the app at the start of a shift or when at work, the only requirement is that their attendance is recorded in some way (for example a separate paper staff rota record can be used).

- No app user information is shared at any point, and it is not possible to tell which positive case the app notification refers to.
- There is a legal difference between **self-isolation notification via the app (advisory)** and **non-app contact from NHS test and trace (mandatory)**.
- The latter form of non-app contact (e.g. text, email, telephone contact, direct individual confirmed positive test) is different to notification via the app itself. This is where there is a clear close contact which has been identified by manual contact tracing and it is mandatory to self-isolate. In cases where an individual is contacted via text, email or telephone - mandatory self-isolation rules will apply to places of work, so that if there is a genuine case in the venue or when they are on shift then they will be contacted, and mandatory self-isolation protections will come into force.
- In Step 4, there will no longer be a mandatory requirement for hospitality venues to display a QR code, nor to collect contact details for customers, staff or other visitors.

Status

- Downloading the NHS COVID-19 app is voluntary.
- Whilst the NHS recommends that people follow all isolation recommendations, self-isolation recommendations from the app are not currently legally enforceable.
- The app is advisory, and it is up to the individual's discretion if and how they use the app and whether they follow its advice.
- Equally, there is no legal obligation on an employer to prevent a staff member that has received a self-isolation notification from the app from coming into work. In contrast, if a staff member is contacted by text, email or telephone by NHS Test & Trace, there is a legal obligation that the staff member completes their self-isolation before returning to work.

Self-isolation period via the app

- A notification from the app does not automatically mean a full 10-day isolation recommendation from notification. It is 10 days from the identified encounter, and the app notification has a countdown clock – so it could be 3-6 days (and unlikely to have a 10-day notification via the app).

Can the app be switched off/paused in certain scenarios?

- Yes, and the NHS actively recommends the app is paused if staff members are carrying out certain tasks behind a screen, or if phones are in lockers etc. Please see below for the direct NHS advice:

Covid Secure businesses and the app

We recognise that many businesses have gone above and beyond on being Covid Secure. Although this reduces the risk of spreading the virus, it doesn't eliminate it.

Pausing the app

Everyone is encouraged to download the NHS COVID-19 app to help fight coronavirus and protect lives. However, there are circumstances where it may produce unnecessary alerts because of the way the technology works not taking into account your surroundings.



We advise that you pause the contact tracing function if:

1. your phone is being stored in a locker or communal area, for example while working or taking part in a leisure activity like swimming
2. you're working behind a Perspex (or equivalent) screen and are fully protected from other people
3. you're a healthcare worker working in a healthcare building such as a hospital or GP surgery
4. you're a worker in social care and are wearing medical grade PPE such as a surgical mask

Unless one of the above four scenarios does not apply to you, we recommend you not pausing the app at any time.

Learn more at www.covid19.nhs.uk or www.covid19.nhs.uk/introducing-the-app-welsh.html
The NHS COVID-19 app is available to download in England and Wales



The above information can be found in the app settings, and the ability to pause the app can also be found within the app.

Can I check employee positive test status?

- A person who has tested positive can provide evidence to their employer, or the fact that they have been in close contact with a positive case, via an isolation note request to the NHS. This can be done via the NHS, link is here: <https://111.nhs.uk/isolation-note/>

Can the mandatory self-isolation period (i.e. from a direct text or email from NHS Test and Trace) be shortened from 10 days, if proof of a negative test is provided?

- Currently this is not possible. However, The Government is piloting daily testing in place of self-isolation in all circumstances, and a test to release system. Ministers are currently reviewing the overall self-isolation policy. From 16th August, any person that has been double-vaccinated for at least two weeks will be exempt for self-isolation.

Further information from the NHS for businesses

- [Information and resources – NHS COVID-19 app support - NHS.UK \(covid19.nhs.uk\)](https://www.nhs.uk/covid19/app-support/)

ANNEX

Template risk assessment (example)

Currently this example is for a food-led business, you will need to complete one for your own individual business. **Please note that the final Risk Assessment can only be developed by YOU because it is about YOUR business.** Any steps or controls in this document are only examples, not prescriptive stages – only you will know how your business works.

Risk Assessment Approach

Whilst every business is different, there are two things in common – the staff and the customer. Both will have ‘journeys’ through the premises. Some worked examples can be found on the HSE website here <https://www.hse.gov.uk/simple-health-safety/risk/risk-assessment-template-and-examples.htm>

The main aim is to demonstrate that the business has considered the routes people take through the business and the hazard and risks encountered by both customers and the staff; confidence in management can be achieved by demonstrating the implementation of necessary controls. This is a hybrid of HACCP and a risk assessment.

Tracing the routes that people will typically take, either to carry out their jobs or as customers, will help inform what risks from COVID-19 are involved, and subsequently how to take action to reduce these risks. This first flow diagram may then need to be adjusted if it is found that the route or journey needs to be changed to ensure a safer environment.

THE PURPOSE OF THIS RISK ASSESSMENT DOCUMENT

By setting concerns and control measures out in a logical way this will give confidence to enforcement officers and customers to show that due consideration has been undertaken.

Similarly, staff can be reassured that every aspect of their work has been considered in relation to COVID-19, and they will have an understanding of the measures you will take together to ensure safety of them and the customers.

Primary Authorities could also be involved where businesses have one, although many do not currently provide Assured Advice on this aspect.

Flow Diagrams

By plotting out the routes taken by staff and customers in your business, you will have a clear idea of where the potential issues may arise.

How to use this document

This document should form part of your Health & Safety management system and be referenced within your business/organisation's Health and Safety policy.

- After drawing the flow diagrams and thinking about all the steps staff and customers do and could take in your business, check the steps on the first column and add or delete as appropriate to your business.
- You can support this document with photographs of your control measures where appropriate and this would be useful for any discussions with the EHO which would have to take place virtually.
- Staff briefing on your controls is an essential part of this process and should be documented. HSE has guidance on talking to you employees
<https://www.hse.gov.uk/coronavirus/working-safely/talk-to-workers.htm>
- Once this is done, you can communicate the message to customers to ensure that they understand that you are behaving responsibly with everyone's safety in mind, and everyone knows what to expect and how to behave.
- Review the document frequently.

RISK ASSESSMENT

Business Name and Address:

Type of Operation (pub, restaurant, hotel, food service etc)

Services Provided:

Head Office Details (if relevant):

Name of Person who has developed this document:

The hazard

SARS-CoV-2 is a respiratory virus that can invade a host via the respiratory route or via hand to eye / mouth / nose contact, causing the disease COVID-19.

People who appear healthy may be carrying and shedding the virus, which can be passed on either directly or indirectly to others. This means we need to assume that anyone could be carrying the virus.

Flow Diagrams

Routes taken by staff and customers in the business, are considered to show the steps in the journeys where controls are needed. Sketch out your own flow diagrams (you may have several for a large business). You could number each step.

This is an example of a sketch of a flow diagram to show a customer coming to a small pub

Example of a customer journey flow diagram

Put your final flow diagrams in here:

Prerequisites

These are controls which will work throughout the system and are not part of the flow diagram. You may have more to add to the list.

This is a list of possible examples of controls that you might pick.

Write in your Prerequisites for your business here:

ITEM	OUR CONTROLS
Back to work (fitness to work) policy	
Disinfection	
Ventilation	
Hand hygiene	
First Aid	

When staff feel unwell	
Smoking or vaping	
Number of staff at work	

Customer Journey Risk Assessment

The next part is to write in all the steps that you have identified in column 1 and **delete any that don't apply to you**. You may have additional ones – put them all in.

The put in the controls that you intend to operate in your business. This depends on the type of business you have, and only you will know what works. Opposite is an example of what sort of controls you could put in – but this is only an example!

Example of Risk Assessment

Customer Journey Risk Assessment (please delete steps that are not needed, add any others)

Customer Journey <i>(add or delete according to the steps identified in your flow diagram)</i>	Controls in my business <i>(Pick controls that suit your business from the UKH Sector specific advice or other guidance, or your own bespoke controls)</i>
Entering the business	
Walking inside or outside	
Ordering food and drinks	
Bar Service	
Food and Drinks Service	

Clearing the customer table	
Going to the toilet	
Paying	
Leaving the business	

STAFF JOURNEY

(add or delete according to the steps identified in your flow diagram)

CONTROLS IN MY BUSINESS

(Pick controls that suit your business from the UKH Sector specific advice or other guidance, or your own bespoke controls)

Before returning to work

Pre-arrival

Arrival

Uniform change (if applicable)

Changing / locker rooms (if applicable)

Kitchen steps

Food Storage (chillers, freezer, dry stores)

Work benches and tables

Equipment

Dishwashing

Pot washing

Grill

Fryers

Pass

Service

Outdoor areas (guest areas, bins and storage)

Cellars

Deliveries	
Front of house	
Table clearing	
Dish / glass washing	
Payment	
Interaction with work colleague	
Using the Staff office	
Leave work	
Using the Staff rest rooms	
Using the staff kitchen	
Using the toilets	

Staff Journey Risk Assessment (delete if not appropriate, add other controls as necessary for YOUR business)

Follow the same process for staff journeys as for customer journeys – tailor the list in column 1 to your operation and pick the steps from the list below, delete those that are not relevant add more as necessary.

Other steps, for example could be:

- Taking room service
- Reception desk
- Canteen / counter service
- Bar service

Final Stages

Once you have updated your risk assessment, share it with team through briefing sessions and create the necessary signs and communications to customers to make sure everyone plays their role.

This document should be kept ready to discuss with an enforcement officer who may wish to discuss how you are controlling the hazard of SARS-CoV-2 in your business.

System and Document Review

Make sure you review this document frequently (probably weekly) during the crisis because guidance may change, and also you may find that working adjustments need to be made. Keep a note of this here.

REVIEW DATE	ISSUE NUMBER (IF APPLICABLE)	SIGNED

