



Casino Guidance – stringent social distancing measures

V2 / JULY 2020



BEIS/CO GUIDANCE

- Failure to complete a risk assessment which takes account of COVID-19, or completing a risk assessment but failing to put in place sufficient measures to manage the risk of COVID-19, could constitute a breach of health and safety law.
- Employers are expected to respond to any advice or notices issued by enforcing authorities rapidly and are required to do so within any timescales imposed by the enforcing authorities.
- From 4 July, you should limit your social interactions to two households (your support bubble counts as one household) in any location; or, if outdoors, potentially up to six people from different households. It will be against the law for gatherings of more than 30 people to take place.
- Venues should consider the cumulative impact of many venues re-opening in a small area. This means working with local authorities, neighbouring businesses and travel operators to assess this risk and applying additional mitigations. These could include:
 - Further lowering capacity - even if it is possible to safely seat a number of people inside a venue, it may not be safe for them all to travel or enter that venue.
 - Staggering entry times with other venues and taking steps to avoid queues building up in surrounding areas.
 - Arranging one-way travel routes between transport hubs and venues.
 - Advising patrons to avoid particular forms of transport or routes and to avoid crowded areas when in transit to the venue.
- Premises or locations which are COVID-19 Secure will be able to hold more than 30 people, subject to their own capacity limits, although any individual groups should not interact with anyone outside of the group they are attending the venue with - so in a group no larger than two households or six people if outdoors.
- Those operating venues following COVID-19 Secure guidelines should take additional steps to ensure the safety of the public and prevent large gatherings or mass events from taking place. At this time, venues should not permit live performances, including drama, comedy and music, to take place in front of a live audience.
- Venues should not permit live performances, including drama, comedy and music, to take place in front of a live audience. This is important to mitigate the risks of droplets and aerosol transmission - from either the performer(s) or their audience.
- All venues should ensure that steps are taken to avoid people needing to unduly raise their voices to each other. This includes - but is not limited to - refraining from playing music or broadcasts that may encourage shouting, including if played at a volume that makes normal conversation difficult. This is because of the potential for increased risk of transmission - particularly from aerosol and droplet transmission. You should take similar steps to prevent other close contact activities - such as communal dancing.
- Making customers aware of, and encouraging compliance with, limits on gatherings. For example, on arrival or at booking. Indoor gatherings are limited to members of any two households (or support bubbles).
- Where a premises delivers a mix of services, only those services that are permitted to be open should be available.

- Avoid using public transport, and aim to walk, cycle, or drive instead. If using public transport is necessary, wearing a face covering is mandatory, unless you are exempt for health, disability or other reasons.
- Public toilets, portable toilets and toilets inside premises should be kept open and carefully managed to reduce the risk of transmission of COVID-19. Steps that will usually be needed:
 - Using signs and posters to build awareness of good handwashing 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.
 - Consider the use of social distancing marking in areas where queues normally form, and the adoption of a limited entry approach, with one in, one out (whilst avoiding the creation of additional bottlenecks).
 - To enable good hand hygiene consider making hand sanitiser available on entry to toilets where safe and practical, and ensure suitable handwashing facilities including running water and liquid soap and suitable options for drying (either paper towels or hand driers) are available.
 - Setting clear use and cleaning guidance for toilets, with increased frequency of cleaning in line with usage. Use normal cleaning products, paying attention to frequently hand touched surfaces, and consider use of disposable cloths or paper roll to clean all hard surfaces.
 - Keep the facilities well ventilated, for example by fixing doors open where appropriate.
 - Special care should be taken for cleaning of portable toilets and larger toilet blocks.
 - Putting up a visible cleaning schedule can keep it up to date and visible.
 - Providing more waste facilities and more frequent rubbish collection.
- The opening up of the economy following the COVID-19 outbreak is being supported by NHS Test and Trace. You should assist this service by keeping a temporary record of your staff shift patterns, customers and visitors for 21 days, in a way that is manageable for your business, and assist NHS Test and Trace with requests for that data if needed. This could help contain clusters or outbreaks. Many businesses that take bookings already have systems for recording their customers and visitors – including restaurants, hotels, and hair salons. If you do not already do this, you should do so to help fight the virus.
- You should assist the Test and Trace service by keeping a temporary record of your staff shift patterns for 21 days and assist NHS Test and Trace with requests for that data if needed. This could help contain clusters or outbreaks.
- From 4th July, 2m or 1m with risk mitigation (where 2m is not viable) are acceptable. You should consider and set out the mitigations you will introduce in your risk assessment.
- You must share the results of your risk assessment with your workforce. If possible, you should consider publishing the results on your website (and we would expect all employers with over 50 workers to do so). We would expect all businesses to demonstrate to their workers and customers that they have properly assessed their risk and taken appropriate measures to mitigate this. You should do this by displaying a notification in a prominent place in your business and on your website, if you have one.
- Providing written or spoken communication of the latest guidelines to both workers and customers inside and outside the venue. You should display posters or information setting out how customers should behave at your venue to keep everyone safe.
- Ensuring any changes to entries, exit and queue management take into account reasonable adjustments for those who need them, including disabled customers. Consider the particular needs of those with protected characteristics, such as those who are hearing or visually impaired.
- To make sure individuals who are advised to stay at home under existing government guidance do not physically come to work. This includes individuals who have symptoms of COVID-19, those who live in a household or are in a support bubble with someone who has symptoms, and those who are advised to self-isolate as part of the government's test and trace service.
- Maintaining good ventilation in the work environment. For example, opening windows and doors frequently, where possible.
- Clinically extremely vulnerable individuals have been strongly advised not to work outside the home during the pandemic peak and only return to work when community infection rates are low.
- Clinically vulnerable individuals, who are at higher risk of severe illness (for example, people with some pre-existing conditions), have been asked to take extra care in observing social distancing and should be helped to work from home, either in their current role or in an alternative role.
- If clinically vulnerable individuals cannot work from home, they should be offered the option of the safest available on-site roles, enabling them to maintain social distancing guidelines (2m, or 1m with risk mitigation where 2m is not viable, is acceptable). If they cannot maintain social distancing you should carefully assess whether this involves an acceptable level of risk. As for any workplace risk you must take into account specific duties to those with protected characteristics, including, for example, expectant mothers who are, as always, entitled to suspension on full pay if suitable roles cannot be found. Particular attention should also be paid to people who live with clinically extremely vulnerable individuals.



IN ADDITION TO THE ABOVE GUIDANCE

Venue

- Track and trace will apply to all customers - names and contact details will be recorded through membership and CCTV matching or recorded at tables to ensure that the customer's time and location is known.
- Capacity must be restricted to ensure that social distancing requirements are met throughout the customer's journey (at a minimum there will be a 50% reduction in current licensed permitted numbers).
- Social distancing will be maintained throughout the premises in-line with the Government's Covid-19 Secure Guidelines.
- Entry to the casino will be made one at a time and queue markers will be used to maintain the 2m social distancing requirement.
- Customers will be required to use hand sanitiser prior to entry.
- Face coverings will be available should customers request them.
- Casino table, machine and restaurant areas must be zoned with staff monitoring and restricting customer movement to ensure social distancing is maintained.
- Where practical, introduce a one-way system round the casino with markings directing and reminding staff and customers of procedures.
- Gaming floor layouts will be reviewed to allow for appropriate social distancing between tables and customers. When required to maintain social distancing, gaming tables will be closed or movable plexiglass screens may be deployed.
- Slot and Electronic Gaming Machine positions will be reviewed to maintain social distancing between customers. In zones where this is not possible, machines will be closed, or plexiglass screens may be deployed.
- If our risk assessment shows that PPE is required, then we will provide this free of charge to workers who need it and ensure that workers are trained to use it.
- Objects and surfaces in the casino will be regularly sanitised including table areas, gaming machines, cards and chips.
- Sanitising solutions will be provided throughout the casino to enable frequent hand cleansing including at tables, gaming machines and entrance.
- Employers must be responsible for reacting and responding to any update in advice or protocols issued by enforcing authorities. These changes must be implemented within the imposed timescale.
- Managers must consider the local impact of venues re-opening. Working with local authorities, neighbouring businesses and travel operators will mitigate risk. E.g. staggering entry times with other venues to avoid queues building up in surrounding areas.
- Venues should limit noise levels and should take action to avoid people needing to raise their voices at each other. This includes refraining from playing music or broadcasts at levels that encourage shouting or volumes that make normal conversation difficult.
- Customers must be made aware that limits on gathering apply, when visiting venues. E.g. indoor gatherings are limited to members of any two households.
- Must share results of Covid-19 risk assessment with workforce and display at the venue to show compliance with this guidance. Should display and communicate the latest guidelines to both staff and customers.
- Any changes to entries, exit and queue management or restrictions placed, must take account for reasonable adjustments for those who may need them, including disabled customers.
- Those in support bubbles must isolate if that households presents symptoms.
- Toilets inside the premises should be kept open and good hygiene, social distancing and cleanliness in toilet facilities must be promoted and implemented.
- Capacity limits will be enforced in specific areas (such as smoking areas, lifts, toilets).
- Our colleagues will be trained to remind our customers of social distancing guidance.
- Sanitiser stations will be available throughout the premises, including back of house areas.
- In line with HSE/PHE guidance, colleagues will have their roles risk-assessed so that our teams are guided to make the necessary adjustments to their role (for instance, guidance on hygiene and social distancing).
- Shift times and working hours will be reviewed to stagger start and finish times. Wherever possible, shift patterns will be changed to match colleagues with the same teams, reducing the number of colleagues that come into contact with each other wherever possible.
- Where possible seating and circulation in staffrooms and canteen areas will be configured to maintain social distancing.
- Our venues will ensure a high compliance with the Government's published Covid-19 Secure Guidelines.
- A high level of sanitation will always be maintained in venues, supported by Risk Assessment and Method Statements.
- Customers will be encouraged to make contactless transactions wherever possible and allowed by law.

Casino and gaming zone

- Customers must queue following social distancing guidelines to access any table games.
 - Customers must remain seated and are not permitted to circulate between tables during play.
 - All seating and table areas must be sanitised before and after customer use.
 - Customers will be issued with their own coloured chips on Roulette that are specific to them. These chips will be sanitised prior to and post customer use. Customers will also be asked to sanitise hands before and after joining tables, sanitiser will be available at all gaming tables and in sanitisation stations around the venue.
 - On Roulette, any cash chips issued to customers either from the gaming table float or from the cash desk will have been pre-sanitised. When the customer either loses the cash chips or redeems the chips at the cash desk, these will again be sanitised prior to returning to the floats.
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- On Blackjack, the chip tray will be divided up into compartments, with dedicated sections of cash chips for each player. Customers will be paid any winnings from their own section of cash chips, which will have been sanitised prior to and post their use. When the customer either loses the cash chips or redeems the chips at the cash desk, these will again be sanitised prior to returning to the floats. Customers will also be asked to sanitise hands before and after joining tables, sanitiser will be available at all tables and in sanitisation stations around the venue.
- Card games - Customers will not be permitted to touch cards during play and the dealer will touch cards on the players behalf. For Baccarat only, where cards do not pass from player to player and are destroyed after one use, customers may touch the cards.
- For the minority of venues where poker is available. Customers must not circulate and will be required to sanitise hands before and after playing.
- Customers will be required to use hand sanitisers before joining and when leaving a gaming table.
- Table capacity limits of a maximum of three players per standard gaming table for Roulette, Blackjack and Three-Card Poker (limits for larger and Covid-19 adapted tables may be higher).
- Gaming machines will be cleaned after each play session. Voucher redemption terminals and ATMs will be sanitised at least once per hour.
- Contact during payments and exchange of documentation will be minimised, electronic payment methods will be used where possible.
- Members should introduce sneeze guards where necessary to increase protections.
- Signage will clearly promote social distancing measures throughout our venues.
- Social distancing will be maintained throughout the premises in-line with the Government's Covid-19 Secure Guidelines.
- Restaurant/Bar areas will be reconfigured to allow for social distancing. Table service will be utilised.
- Using social distance markings to remind customers to maintain social distancing (2m, or 1m with risk mitigation where 2m is not viable, is acceptable) between customers of different households or support bubbles.
- Minimising customer self service of food, cutlery and condiments to reduce risk of transmission. For example, providing cutlery and condiments only when food is served.
- 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).
- Providing only disposable condiments or cleaning non-disposable condiment containers after each use.
- Reducing the number of surfaces touched by both staff and customers. For example, asking customers to remain at a table where possible, or to not lean on counters.
- Ensuring all outdoor areas, with particular regard to covered areas, have sufficient ventilation. For example, increasing the open sides of a covered area.
- Minimising contact between kitchen workers and front of house workers, delivery drivers or riders, for example, by having zones from which delivery drivers can collect packaged food items.
- Limiting access to venues for people waiting for or collecting takeaways. Setting out clear demarcation for social distancing (2m, or 1m with risk mitigation where 2m is not viable, is acceptable) for delivery drivers, riders or customers queuing.
- Working with your local authority, landlord and neighbours to ensure designated waiting areas do not obstruct public spaces
- Encouraging use of contactless ordering from tables where available. For example, through an ordering app.
- Adjusting service approaches to minimise staff contact with customers. Indoor table service must be used where possible, alongside further measures such as assigning a single staff member per table. Outdoor table service should also be encouraged, although customers are permitted to stand outside if distanced appropriately. Where bar or counter service is unavoidable, preventing customers from remaining at the bar or counter after ordering.
- Minimising contact between kitchen workers and front of house workers. For example, by having zones from which front of house staff can collect food. Encouraging use of outdoor areas for service where possible. For example, increasing outdoor seating or outdoor points of service such as stalls. Adjusting processes to prevent customers from congregating at points of service. For example, having only staff collect and return empty glasses to the bar.



CASINO RESTAURANT ZONE

The Government's COVID-19 Secure guidelines are the standards against which to assess your premises and make your business COVID-19 safe. As an employer, you have a legal responsibility to protect workers and others from risk to their health and safety. This means you need to think about the risks they face and do everything reasonably practicable to minimise them, recognising you cannot completely eliminate the risk of COVID-19.

Casinos will enforce the latest Government Guidance on Keeping workers and customers safe during COVID-19 in restaurants, pubs, bars and takeaway services available [here](#).

This guidance includes but is not limited to:

- Maintaining social distancing (2m, or 1m with risk mitigation where 2m is not viable, is acceptable) from customers when taking orders from customers.



STAFF RETURN AND FITNESS TO WORK

It is recommended that businesses should carry out a return to work conversation, with staff. HSE has guidance on talking to employees about Covid-19. This should be carried out for all staff returning to work in the work environment, to ensure staff safety. Clinically extremely vulnerable individuals have been strongly advised not to work outside the home. Clinically vulnerable individuals, who are at higher risk of severe illness, have been asked to take extra care in observing social distancing and should be helped to work from home, either in their current role or in an alternative role. If clinically vulnerable (but not extremely clinically vulnerable) individuals cannot work from home, they should be offered the option of the safest available on-site roles, enabling them to socially distance from others. If they have to spend time closer than the social distance to others, you should carefully assess whether this involves an acceptable level of risk. As for any workplace risk you must take into account specific duties to those with protected characteristics, including, for example, expectant mothers who are, as always, entitled to suspension on full pay if suitable roles cannot be found. Particular attention should also be paid to people who live with clinically extremely vulnerable individuals.

You should also provide support for workers around mental health and wellbeing.



PEOPLE WHO NEED TO SELF-ISOLATE

The current advice is that individuals who are advised to stay at home under existing government guidance do not physically come to work. This includes individuals who have symptoms of COVID-19 as well as those who live in a household with someone who has symptoms and those who are advised to self-isolate as part of the government's test and trace program. Enable workers to work from home while self-isolating if appropriate. See current guidance for employers and employees relating to statutory sick pay due to coronavirus. See current guidance for people who have symptoms and those who live with others who have symptoms.



HYGIENE

Good hygiene is vital to the reduction of transmission. All handwashing to always be in line with Government guidelines regarding method and length of washing. All staff should wash their hands when arriving at work, as well as before handling or eating food, or after blowing noses, coughing or sneezing, or going to the toilet.

Communications to staff should remind everyone to wash their hands or use a suitable hand gel at the start of every shift. Hand sanitiser could also be placed in multiple locations in addition to washrooms.



ADVICE FOR STAFF TO TAKE HOME

A general commitment to hygiene should be regularly communicated to staff, including transmission threats outside of the workplace, infection and quarantine guidelines, and actions to reduce risk of infection in the home.



STAFF PROTECTION

All Government advice should be adhered to with regard to protection of staff from COVID-19 and actions to limit risk of transmission. This will include developing cleaning, handwashing and hygiene procedures and maintaining social distancing, where possible. Below are some suggested control measures to consider as part of your risk assessment and development of risk management procedures. Please note this list is not exhaustive. The most important thing is to remember the routes of transmission, and to work out what actions are most effective in your business.

- Heightened cleaning and disinfection to disinfect all frequently touched areas in staff areas such as tables, chairs, counters tills, card machines, etc.
- For staff break areas/canteens, stagger timings so that groups of staff have slots to come for their meals to reduce gathering.
- In office/admin areas, many people could be sharing the phone, keyboard, mouse, and the desk. If these items are shared, they should be cleaned using your usual cleaning products before being used, and cleaning products should be made available for this purpose.
- Make sure that the social distancing rule applies at lunch or smoking/vaping breaks.
- Wash items in accordance with the manufacturer's instructions. Use the warmest water setting and dry items completely. There is more control if laundry is carried out in-house or professionally, rather than staff taking it home.



WASTE DISPOSAL

Contact your waste contractor to advise them of any changes in your procedures, such as increased frequency of collections. Consider additional litter bins on your premises to encourage customers to dispose of their own waste, such as takeaway containers or wrappers. This will reduce the need for staff to touch items that have been left or touched by customers, as well as reducing littering on and around your premises.



PROTECTIVE EQUIPMENT

The Government advises that when managing the risk of COVID-19, additional PPE (beyond what you usually wear) is not beneficial. This is because COVID-19 is a different type of risk to the risks you normally face in a workplace, and needs to be managed through social distancing, hygiene and fixed teams or partnering, not through the use of PPE. Workplaces should not encourage the precautionary use of extra PPE to protect against COVID-19 outside clinical settings or when responding to a suspected or confirmed case of COVID-19. The Government advises that unless you are in a situation where the risk of COVID-19 transmission is very high, your risk assessment should reflect the fact that the role of PPE in providing additional protection is extremely limited. Government guidance can be found here - More information on PPE and face coverings.



TRAINING

Training should be given to ensure that all staff understand the new risks, and should include details on social distancing requirements, routes of transmission and the importance of hand washing and surface disinfection at key times. All staff should be instructed about not coming to work if they have a high temperature, new continuous cough or the loss of taste or smell. They should stay at home for seven days (or for as long as prevailing guidance dictates).



ADVICE TO STAFF WORKING IN KITCHENS

- Kitchen management is challenging, and will require planning and in some cases rearranging.
- As every restaurant business is different, consideration for the individual site and kitchen should be developed as part of your overall risk assessment, reviewed and communicated to all staff.
- In kitchens, continue to use your regular cleaning regime as usual, and at the end of the shift you may want to go over all hand touch surfaces one more time before closing.
- You could include guidance regarding the number of people allowed in the chilled stores or dry stores at one time, keeping to social distance requirements, or the changing rooms/staff toilet areas.
- Use a dishwasher (if available) to clean and dry used crockery and cutlery. If this is not possible, wash them by hand using detergent and warm water and dry them thoroughly, using a separate tea towel.



CUSTOMER PROTECTION – EAT-IN RESTAURANT OPERATIONS

Please refer to the government guidance on pubs and restaurants: <https://assets.publishing.service.gov.uk/media/5eb96e8e86650c278b077616/Keeping-workers-and-customers-safe-during-covid-19-restaurants-pubs-bars-takeaways-230620.pdf>