ClubsNSW

CLUB INDUSTRY REOPENING PACK

This Pack is designed to help clubs prepare for recommencing trade and implement appropriate procedures to mitigate the risk of COVID-19 transmission in the club premises.

This Pack consists of:

- A one-page **checklist** on **What to do Before Reopening**
- A list of **CovidSAFE Standards for the Club Industry**
- A one-page **checklist** which summarises the **CovidSAFE standards**
- A ClubsNSW **checklist** for **reopening the gaming floor** which can be found here
- Pro-forma **Letters to "Stand-up" Re-engaged Employees** – hyperlinks to these letters are included in the 'Employees' section of what to do before reopening below

The CovidSAFE standards for the club industry incorporate and draw information from a range of materials:

- The Safe Work Australia (SWA) guidance for the hospitality industry
- Industry reopening standards discussed between ClubsNSW and the NSW Government
- Existing legislative obligations, particularly the *Work Health and Safety Act 2011* (NSW) and *Food Act 2003* (NSW)

This Pack will be amended from time-to-time as new standards, insights and best practice measures develop. The table below clarifies the details of the versions:

Revision history		
Version	**Date**	**Changes**
1	22 May 2020	Initial version
2	24 May 2020	- Clarify guidance on patron capacity limits and physical distancing - Minor content and formatting changes

CHECKLIST – WHAT TO DO BEFORE REOPENING

Operational

☐ Talk to your bank about replenishing cash floats to ensure there is enough cash in the cash redemption terminals (CRTs) and cashier's desk, as well as other cash registers

☐ Deep clean the venue with disinfectant and, if necessary, carry out pest control

☐ Switch on electrical equipment to check it is still operational (e.g. EGMs, EBTs, Keno terminals, refrigerators, air conditioning, televisions, speakers). It is important to check the equipment as early as possible, to leave enough time for repairs

☐ Ensure gaming machines are connected to the central monitoring system (CMS) by checking the site controller

☐ Check EGM machines linked to a jackpot are communicating with the controller

☐ Complete a KENO reactivation form – to be provided shortly

☐ Contact the relevant supplier for advice on cleaning beer lines and post-mix

☐ Consider which providers must be notified of the club premises' reopening (e.g. Foxtel, insurance providers)

☐ Contact suppliers early to order key supplies such as beer and cleaning products

☐ Ensure the kitchen is ready for food preparation (further guidance can be found here)

Resources on restarting operations

– Gaming: See here for a ClubsNSW checklist on reopening the gaming floor

– Beer: See here for Carlton & United Breweries information on restarting an Icebank Beer System; see here for Lancer information on Glycol Pump Start Up; and see here for Lion information on restarting beer operations

– TAB: See here for information on restarting TAB wagering facilities

– Additional supplier resources, including the KENO reactivation form, will be uploaded to the dedicated webpage as they are submitted (see here)

Employees

☐ Give re-engaged employees a "stand up" letter. ClubsNSW has developed pro-forma letters to give employee with the same hours and duties, and different hours or duties.

☐ Undertake a risk assessment for all vulnerable employees and, if necessary, alter the characteristics of their work to mitigate their heightened risk (for more information, see the SWA's hospitality guidance for vulnerable workers, here)

☐ Instruct employees to stay home and get tested for COVID-19 if they are unwell, or are a close contact of a person with COVID-19, and only return to work with a medical certificate substantiating their good health

☐ Estimate the required functions and number of employees predicted for when the club reopens, and avoid bringing back more employees than required

Regulatory

☐ If some EGMs are being moved into a new area of the premises, apply to make the additional gaming area restricted (if the area is currently non-restricted) and ensure the additional area has compliant harm minimisation signage

COVIDSAFE STANDARDS FOR THE CLUB INDUSTRY

Community Risk

Identify and respond to heightened COVID-19 risks

➢ Clubs must have the agility to quickly respond to increases in community risk by varying their CovidSAFE measures

Recommendations

✓ Monitor the NSW Health website daily to check if the Club's local government area (LGA), or a neighbouring LGA, is identified as an "area for increased testing and surveillance" (see here for the NSW Health page on at-risk LGAs)
✓ Apply stricter CovidSAFE standards if the community risk increases – e.g. be prepared to clean more regularly, further restrict patron capacity, contact members to reinforce the importance of social distancing and personal hygiene requirements
✓ Encourage staff to report to the club if they contract COVID-19, and notify NSW Health immediately upon becoming aware that a person with COVID-19 could have been on the club premises while infected

Physical Distancing

Take active measures to promote physical distancing of 1.5 metres between all persons in – and attempting to enter – the premises

➢ Person to person transmission is the main way COVID-19 is thought to spread
➢ Guidance from the Australian Department of Health cautions against two people spending more than 15 minutes within 1.5 metres of one another – either in a single stretch of time, or cumulatively throughout the day
➢ Droplets containing the coronavirus can be transmitted from person to person through coughing and sneezing, but they can also be spread simply by talking
➢ There is an increased risk of unsafe physical distancing if patrons are drinking or socialising while standing

Recommendations

✓ It is vital to have a plan to manage large gatherings of patrons outside the venue
✓ Appoint one or more CovidSAFE marshals to roam the venue, and be visibly identifiable (e.g. hi-vis vest), to enforce physical distancing and good personal hygiene behaviours
✓ Make regular announcements on the public address (PA) system encouraging physical distancing
✓ Use floor markings where people are likely to queue
✓ Identify activities within the premises where patrons are likely to spend more than 15 minutes within 1.5 metres of one another, and take steps to mitigate those risks
✓ Prominently display signs throughout the venue which encourage physical distancing (you may use this sign developed by the Australian Government)
✓ Communicate physical distancing standards to people delivering goods to the club
✓ To reduce the number of patrons standing, consider using table service for taking food and beverage orders

✓ Refer to the [Australian Institute of Sport (AIS) framework](#) for distancing standards applying to sports – including golf and bowls

Make the club's internal layout conducive to physical distancing

➢ The positioning of chairs, furniture and entrance points can impact social distancing
➢ The [Australian Government guidance](#) is "it is not necessary to install a screen between workers and the public (customers) as the interaction time between them is shorter."
➢ There is no guidance to suggest physical distancing of 1.5 metres changes based on whether workers or patrons are sitting or standing side-to-side (i.e. facing the same direction rather than each other) or back-to-back. Given the implications for gaming, bar and dining seating, this Pack will be updated if new guidance is issued **[this point was added in Version 2]**
➢ There is no guidance on whether seating should be spaced based on the edge or centre of the chair or stool. Therefore, ClubsNSW cannot offer any prescriptive guidance in this regard. Clubs should form their own judgement, noting the reason physical distancing is recommended; that droplets emitted from the mouth or nose of an infected person may transmit to the eyes, mouth or nose of a person who is not infected **[this point was added in Version 2]**

Recommendations

✓ Move gaming machines or make them inaccessible, so that there is 1.5 metres between the seats
✓ Remove or cordon off multi-seating couches
✓ Separate bar and dining tables so groups on one table are not in close proximity to groups on another table
✓ Have separate entry and exit points so patrons do not walk directly past each other – while also noting that the requirement for patrons to sign-out may require patrons entering and exiting to cross paths at one point

Hygiene

Encourage patrons to practise good personal hygiene

➢ In addition to hand hygiene (below), good personal hygiene includes covering coughs and sneezes with the inner elbow or clean tissue, not touching the face, eyes, nose or mouth, and no physical contact with others (e.g. shaking hands, hugging)

Recommendations

✓ Appoint one or more CovidSAFE marshals to roam the venue, and be visibly identifiable (e.g. hi-vis vest), to enforce physical distancing and good personal hygiene behaviours
✓ Make regular announcements on the public address (PA) system encouraging good personal hygiene
✓ Prominently display signs throughout the venue which encourage good personal hygiene behaviours (you may use [this sign](#) developed by the Australian Government)
✓ Send a communication to members before reopening reinforcing good personal hygiene practices
✓ Use signage to encourage contactless payments

✓ Refer to the AIS framework for hygiene standards applying to sports – including golf and bowls

Ensure appropriate hand cleaning facilities are accessible

➢ Proper hand washing means using soap and water for a minimum of 20 seconds and drying hands with a paper towel
➢ An alcohol-based hand sanitiser is only effective if it contains at least 60% ethanol or 70% isopropanol

Recommendations

✓ Make available alcohol-based hand sanitiser at entry and exit points, and in each room of the premises
✓ Conduct due diligence on purchases of commercial quantities of hand sanitiser, by asking the supplier if the product meets the above requirements and obtaining a *safety data sheet* (a club must already obtain a safety data sheet for sanitiser and certain cleaning products, pursuant to Part 7.1 of the WHS Regulation 2017)
✓ Prominently display signs near hand cleaning facilities on how to correctly clean hands (you may use these signs on [correctly using sanitising](#) and [correctly washing hands](#))
✓ Make available disposable paper towels in the restrooms for drying hands

Ensure dining and bar items are not accessible by patrons and that non-disposable menus are laminated and cleaned between use

➢ Dining and bar items include cutlery (as well as cutlery trays), salt and pepper shakers, sauces, crockery, cups, serviettes, and water jugs
➢ SWA notes that menus pose a risk of COVID-19 transmission (see [here](#))

Recommendations

✓ Use disposable menus, or laminated menus (laminated menus should be cleaned between all uses),
✓ In dining and restaurant facilities, keep all cutlery, crockery, and cups behind the counter, and bring them to the table upon the patron being served their food or beverage
✓ Clean tables promptly after the patron departs (e.g. remove empty beverage containers, and dirty crockery and cutlery)
✓ Do not have buffet-style dining and do not serve communal bar snacks

Cleaning

Regularly clean frequently touched surfaces (FTS) using detergent or disinfectant

➢ FTS include door handles, hand railings, counters, armrests of chairs (if not fabric), taps, pens, straw dispensers, as well as surfaces and buttons on EGMs, EBTs, Keno terminals and ATMs
➢ Cleaning should only be conducted with detergent or disinfectant – refer to SWA guidance for information on cleaning and disinfecting (see [here](#))
➢ In determining the frequency of cleaning FTS, it should be noted that COVID-19 can survive on hard surfaces such as plastic and stainless steel for up to 72 hours

- ➢ Disinfectant is more effective than detergent at reducing the risk of COVID-19 transmission, and should therefore be reserved for high-risk surfaces
- ➢ Disinfectant wipes should not be used by patrons in areas where smoking is permitted
- ➢ To be effective, disinfectant should contain greater than or equal to 70 % alcohol, quaternary ammonium compounds, chlorine bleach or oxygen bleach
- ➢ Cleaning gaming machines with disinfectant is not necessary and may damage the machine (see here for a note from Aristocrat on cleaning machines)

Recommendations

- ✓ Keep a cleaning schedule which
    - o identifies each FTS in the venue
    - o specifies the frequency with which each FTS, restrooms and other surfaces or areas will be cleaned
- ✓ FTS should be cleaned at least once every 60 minutes using a detergent and water solution or disinfectant
- ✓ An EGM should be cleaned after a patron stops using it
- ✓ Conduct due diligence on purchases of commercial-grade detergent or disinfectant – or the use of these products by contract cleaners – by obtaining a *safety data sheet*
- ✓ Require cleaning staff to wear disposable gloves and correctly dispose of the gloves when they become damaged or soiled, or when cleaning is complete (refer to SWA guidance on gloves, here). Gloves should be disposed of in a sturdy, leak-proof plastic bag that is tied shut and not reopened

Frequently clean restrooms using disinfectant

- ➢ Restrooms pose a greater risk of COVID-19 transmission due to the frequency of people touching the same surfaces – these include door handles, door locks, toilet seat and buttons, taps, washbasins, counters

Recommendations

- ✓ Clean restrooms once every 15 minutes using disinfectant
- ✓ Require the staff cleaning restrooms to wear disposable gloves and possibly other personal protective equipment (PPE) such as eye-protection and a mask

Managing Patrons

Manage and enforce the venue capacity [This Standard and the below guidance were amended in Version 2]

- ➢ The venue capacity is governed by legislation which may change from time-to-time
- ➢ The legislation may separately impose a *patron/customer* capacity limit as well as a *person* capacity limit. To take a simplified example, suppose legislation provides that 50 patrons (excl. staff, contractors etc.) are permitted into a venue at one time, **and** that the venue capacity (incl. staff, contractors etc.) cannot exceed 1 person per 4 sqm. In this example, a club with floorspace of 200 sqm and 10 staff would only be permitted 40 patrons. This is because permitting 50 patrons would result in the 1 person per 4 sqm rule being exceeded. Since the legislation changes from time-to-time, ClubsNSW will provide guidance on venue capacity limits in circulars

➢ Clubs should still encourage physical distancing within the venue and in each room

Recommendations

✓ Determine the floorspace of the venue on the floorplan, and set the capacity accordingly
✓ Monitor the capacity of the premises in real time
✓ Leave a buffer so there is capacity to admit people that are not patrons (e.g. contractors
✓ Do not allow a long queue outside the venue, and have a plan to manage crowds outside the venue – e.g. set a limit for the number of people in the queue and consider using barriers and markers
✓ Keep a copy of the floorplan specifying the total square metres to show Police or other inspectors

Collect the first and last name, residential address and contact number of every patron

➢ By ensuring that a list of patron details is recorded – including a contact number – contact tracing can quickly and accurately occur if there is a case of COVID-19 on the premises

Recommendations

✓ Talk to the club's sign-in provider to ensure the system is capable of obtaining this information, including a contact number from every patron
✓ Consider asking patrons to "sign-out", and making the necessary configurations to the system (noting that legislation may make "sign-out" mandatory)
✓ If necessary, update the club's privacy policy so that it authorises the club to disclose the person's details to the NSW or Australian Health authorities

Remove or refuse entry to patrons at risk of transmitting COVID-19

➢ While clubs cannot verify whether patrons have COVID-19, certain screening measures may mitigate the risk of admitting patrons with COVID-19
➢ Clubs should reconsider whether it is necessary to purchase expensive thermal imaging cameras

Recommendations

✓ Remove patrons who repeatedly fail to observe basic physical distancing or personal hygiene measures (e.g. repeatedly coughing into the air, patting staff on the back)
✓ It is not essential to use a screening system at entry; however you may wish to use screening questions (e.g. ask the patron if they feel unwell) or a contactless thermometer
✓ Patrons identified as being at-risk (for e.g. if they look unwell or report being unwell) should be encouraged to get tested. Clubs should be aware of nearby testing facilities
✓ Consider limiting entry to specified patrons (e.g. restricting entry to members)

Managing Staff

Do not allow staff to work if they are unwell

Recommendations

✓ Instruct employees to stay home and get tested for COVID-19 if they are unwell or a close contact of a person with COVID-19, and only return to work with a medical certificate substantiating their good health

Consider making alternative working arrangements for vulnerable workers

➢ A vulnerable worker is a person 70 and over, a person 65 and over with a chronic illness, a person 55 and over who is Aboriginal, and person with a compromised immune system

Recommendations

✓ Speak to each vulnerable worker and consider whether it would be appropriate for them to do different hours or responsibilities
✓ For example, if a vulnerable worker normally works behind the bar, the club could instruct the person to wear PPE, clean their hands more regularly or refrain from handling cash

Educate staff on the club's WHS obligations and take measures to protect staff

➢ Clubs must ensure there are methods in place for staff to understand and carry out the club's CovidSAFE obligations
➢ Section 19 of the WHS Act already requires employers to take reasonable steps to ensure a healthy and safe workplace for employees and patrons. Methods such as training as well as policies and procedures are considered reasonable steps
➢ Club Employers Mutual is developing a *site safety plan* to help clubs comply with their WHS obligations. The plan is being review by Safe Work NSW, and once the *plan* is ready, we will update the CovidSAFE Standards

Recommendations

✓ Ask staff to complete training on managing COVID-19 management infection control training (see here for details of complimentary, online training offered by Barringtons, and see here for infection control training by the Australian Department of Health)
✓ Consider requiring certain staff – such as managers and CovidSAFE Marshals – to complete nationally-accredited infection-control training. Clubs should note that the Australian Government is providing $80 million of subsidies for Registered Training Organisations to carry out nationally-accredited infection-control training for customer-facing industries, with further details to be announced by the NSW Government shortly (see here)
✓ Undertake a WHS risk assessment which identifies at-risk workers and situations
✓ Update the club's WHS policy and procedures with a view to mitigating risk (including for vulnerable workers), and communicate the new policy to staff
✓ Employees should be instructed to correctly clean their hands every 30 minutes, and immediately before commencing work

CHECKLIST – COVIDSAFE STANDARDS FOR CLUBS

☐ **Identify and respond to heightened COVID-19 risks:** Monitor at-risk LGAs, plan to implement stricter measures, immediately notify NSW Health if a person with COVID-19 could have spent time on the club premises

☐ **Take active measures to promote physical distancing of 1.5 metres between all persons in – and attempting to enter – the premises:** Have a plan to manage gatherings outside the venue, appoint CovidSAFE Marshals, use PA messaging, use floor markings, offer table service, refer to AIS framework for sports

☐ **Make the club's internal layout conducive to physical distancing:** Make gaming machine seating 1.5 metres apart, have separate entry and exit points, no multi-seat couches

☐ **Encourage patrons to practise good personal hygiene:** Appoint CovidSAFE Marshals, use PA messaging, display signs to promote responsible behaviour (e.g. coughing etiquette), refer to AIS framework for sports

☐ **Ensure appropriate hand cleaning facilities are accessible:** Make available sanitiser at entry points and in each room, display signs to show correct hand cleaning, make paper towels available in restrooms

☐ **Ensure that dining and bar items are not accessible by patrons and that non-disposable menus are laminated and cleaned between use:** No buffet-style dining, bring out crockery, cutlery, cups and serviettes upon service, and promptly clean tables

☐ **Regularly clean frequently touched surfaces (FTS) – particularly FTS in restrooms – using detergent or disinfectant:** Have a cleaning schedule which identifies FTS and the cleaning frequency, conduct due diligence on the effectiveness of cleaning products

☐ **Frequently clean restrooms using disinfectant:** Consider cleaning restrooms with disinfectant every 15 minutes, ensure cleaning staff use disposable gloves and possibly other PPE

☐ **Manage and enforce the venue capacity:** Monitor legislated venue capacity requirements, monitor capacity in real time, leave an appropriate buffer

☐ **Collect the first and last name, residential address and contact number of every patron:** Talk to the sign-in provider, require members to swipe their card or present ID

☐ **Remove or refuse entry to patrons at risk of transmitting COVID-19:** Remove patrons who repeatedly fail to observe distancing or hygiene standards, consider using a contactless thermometer or screening questions at entry, consider restricting entry to members

☐ **Do not allow staff to work if they are unwell:** Instruct staff to stay home if they are unwell and request a medical certificate upon their return

☐ **Consider making alternative working arrangements for vulnerable workers:** Talk to each vulnerable worker to consider alternative hours or responsibilities

☐ **Educate staff on the club's WHS obligations and take measures to protect staff:** Require staff to complete infection control training, update WHS policy