

COVID Management Plan Guidance

Definition of a COVID Management Plan

A COVID Management Plan is a unique and comprehensive plan that must be specific to your venue or activity. The plan sets out how a high-risk activity will be managed to reduce the risk of transmission of COVID-19 between patrons/attendees and staff.

High-risk public activities that require a COVID Management Plan include:

- Gatherings and activities of more than 1,000 people.
- Licenced premises under *the Liquor Licencing Act 1997* where both dancing and the consumption of liquor occurs.
- The operation of a nightclub, where the principle purpose of the premise is for the consumption of liquor, the playing of loud, amplified music and dancing.

Definition of high-risk activities

High-risk activities are activities that present a higher risk of COVID-19 transmission. These risk factors include, but are not limited to:

- Large numbers of people gathering in a single location.
- Events or activities held indoors.
- Higher levels of movement and interaction.
- Interaction between non-familiar social groups.
- Confined spaces or small room size.
- Activities that involve forced exhalation (i.e. dancing or physical activity).
- Consumption of alcohol.
- The type of ventilation.
- Likelihood of prolonged contact with strangers.
- How people travel to and from the event, assemble, enter and exit, and behave at the event in relation to social distancing and hygiene.

Examples of the types of high-risk activities include activities such as hospitality, weddings and other large ceremonies, stadium events, public events, nightclubs, and depending upon capacity and their activity, pubs, clubs, and bars.

An activity that is considered to be lower risk has the following characteristics:

- Low numbers of people gathering.
- Events or activities held outdoors.
- Lower levels of interaction/movement of people (eg seated).
- Interaction between familiar social groups.
- Open spaces or large rooms.
- No consumption of alcohol.

When a COVID Management Plan is required

It is important that you familiarise yourself with the current Emergency Management Direction on Public Activities. This can be obtained from www.covid-19.sa.gov.au.

The table below provides guidance on when a COVID Management Plan and/or a COVID-Safe Plan will be required. If you already have a COVID-Safe Plan in place, it should be submitted together with your COVID Management Plan.

A COVID-Safe Plan can be obtained from (www.covid-19.sa.gov.au).

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| Defined public activities for under 1000 people | COVID-Safe Plan |
| Venues/Activities with no drinking of liquor or dancing | COVID-Safe Plan |
| Venues/Activities with dancing but no drinking of liquor | COVID-Safe Plan |
| Venues/Activities with drinking of liquor and dancing | COVID Management Plan |
| Venues/Activities with drinking of liquor and dancing that has multiple vendors | COVID Management Plan for the event/activity, and a COVID-Safe Plan for each vendor |
| Activities, events, gatherings with over 1000 people | COVID Management Plan |
| Activities, events, gatherings with over 1000 people that has multiple individual vendors | COVID Management Plan for the event/activity, and a COVID-Safe Plan for each vendor |

The responsibility for the implementation of your COVID Management Plan will belong to the venue owner/event coordinator.

Requirement for multiple COVID Management Plans

COVID Management Plans must include control measures that address your site’s particular layout, total capacity, and facility design according to the activity to be undertaken. Therefore, in some instances you may need to submit more than one COVID Management Plan. This may occur when:

- An activity is held across multiple locations.
- A venue has different types of high-risk activities on the same site (eg competitive sport on an oval and dinner/dancing in the sports club).

COVID Management Plan principles

A COVID Management Plan must address three principles for both staff and patrons/attendees. These principles aim to reduce the risk of transmission in a public place/event.

These three principles are:

1. **Density:** The maximum number of people (excluding staff or people undertaking official duties) in any single room or enclosed area must not exceed 1 person per 2 square metres.
2. **Distancing:** Endeavour to ensure social groups and individuals maintain a distance of 1.5 meters apart.
3. **Contact Tracing:** Contact tracing records containing the full name, contact number and/or email address must be gathered and retained for each patron/attendee in the event of a positive COVID-19 test result. A copy of the Contact Tracing Record can be obtained from www.Covid-19.sa.gov.au.

Operational Control Standards

Your COVID Management Plan must also address five Operational Control Standards.

In addition to state and local legislation (e.g. food safety standards, work health and safety, building and planning) venue and event operators must describe the processes or changes they will make to protect staff, volunteers, as well as patrons and attendees to minimise the risk of transmission of COVID-19 while operating.

Your COVID Management Plan must consider and develop measures to address each of the following five Operational Control Standards.

1. **Staff and patron health and wellbeing:** Patrons/attendees and staff/volunteers must actively declare that they are well and symptom-free.
2. **Hygiene and cleaning:** Operators must minimise surface contamination, encourage personal hygiene, and use cleaning products that include detergent or disinfectant.
3. **Public health education/information:** Staff/volunteers and patrons/attendees understand and are responsible for their physical distancing and hygiene practices, are educated on the potential risks of certain behaviours, and understand the event/venue's COVID Management Plan requirements.
4. **Food and beverage service:** Operators must take steps to minimise the risk of transmission in the preparation and serving of food and beverages.
5. **Non-compliance and incident management:** Operators must detail how they will deal with patron/attendee/volunteers/staff non-compliance, and incidents that may occur during the course of business/the event.

Submitting a COVID Management Plan

Each venue operator or event coordinator must complete and submit a COVID Management Plan using a template available at www.Covid-19.sa.gov.au.

For the activities that require both a COVID-Safe Plan and a COVID Management Plan, these should be submitted as one application where possible. However, depending upon the activity, COVID-Safe Plans can be submitted after the event has been granted approval. For example, a large festival may obtain approval on their COVID Management Plan first, then seek to submit COVID-Safe Plans after they have secured vendors.

If you require assistance or have any queries while completing your COVID Management Plan, you can contact your local industry association or peak body, or SA Health at:

- Tel: 8226 7100
- Email: public.health@sa.gov.au

When your COVID Management Plan is complete, please email the final copy and any supporting documentation to: Health.COVIDManagementPlan@sa.gov.au.

Initial review of COVID Management Plans

Upon receipt of your COVID Management Plan, SA Health will check your plan to ensure it has a sufficient level of detail that addresses all of the requirements. If further information is required, you will be contacted and advised of what further information may be required and asked to re-submit your plan.

As there are significant risks to be managed, each COVID Management Plan will need to be detailed and thorough, as well as specific to both the site and the activity. It must be sustainable in the long-term as we will continue to live with COVID-19 for some time to come.

The initial review process will conclude with a recommendation to SA Health's COVID Management Committee who will undertake a formal assessment of the plan against the three infection control principles and five operational standards.

Assessment of a COVID Management Plan

The approval of your COVID Management Plan will be based on an assessment of how thoroughly the venue/event will address the infection control principles of density, distancing and contact tracing, as well as the five Operational Control Standards.

Each criteria will apply to every aspect of the venue, facility, or location of the event with regard to public and staff areas, as well as mitigating risks related to public transportation to and from the activity (where applicable).

A COVID Management Plan must be detailed and thorough, and specific to both the site and the activity. The Plan must be implemented and guide operations for the long-term as we continue to live with COVID-19.

This approach allows businesses to identify whether and how it is viable to operate in a way that adequately addresses risk, rather than imposing restrictions which do not necessarily fit every business or circumstance.

SA Health will approve COVID Management Plans if they adequately address the risks. The approval process may involve site visits or meetings to discuss plan details.

You will be notified in writing on the outcome of the assessment. This will include a determination on whether your plan has been approved, rejected, or conditionally approved subject to your organisation making changes to your measures and updating your plan.

If your plan is rejected, SA Health will advise you of the reasons and will provide advice on possible ways to address the plan's deficiencies. You can then choose to submit an updated Plan.

Responsibilities of the venue owner/event coordinator

The responsibility and accountability for a COVID Management Plan rests with the venue owner/activity coordinator, and it must be tailored to your venue or activity. Specifically, a venue owner/activity coordinator will be responsible for:

- Drafting and submitting a comprehensive and complete COVID Management Plan in accordance with the template and guidance provided by SA Health.
- Providing further information to SA Health on request. This may be during the initial review process or during the assessment process.
- Assisting SA Health in undertaking site visits where required.
- The implementation of infection control measures in accordance with your approved COVID Management Plan.
- Public communication of the venue/activity's COVID measures.
- Monitoring the effectiveness of the measures and making timely adjustments where necessary.
- Re-submitting an updated COVID Management Plan when required. This may be due to changes identified by the venue owner/activity coordinator, by SAPOL or SA Health.
- Maintaining contact tracing records until such time as the Emergency Direction is revoked.

Timeline for COVID Management Plan assessment

A COVID Management Plan manages high-risk activities, and SA Health must be certain that the event/activity can proceed safely.

It may take several weeks from the time your submission has been accepted to receiving the assessment of your COVID Management Plan.

The time taken to approve a COVID Management Plan will be subject to a number of factors:

- The risk level of your activity (i.e. an indoor activity is a higher risk than an outdoor activity).
- The complexity of your COVID Management Plan.
- Responsiveness of the applicant in addressing SA Health's enquiries or request for more information.

Your application will not be progressed until all information is obtained for assessment.

Communication of your COVID Management Plan

Once approved, your COVID Management Plan must be made available for the public and for authorised officers in the event of a site inspection. SA Health may also choose to publicly release your COVID Management Plan.

Dancing and drinking without a liquor license

If your event or venue does not require a liquor licence, drinking and dancing can occur together. However, there must not be more than 1,000 people and the venue operator will need to complete a COVID-Safe Plan.

There are many situations where a liquor licence is required; if you are not sure if you require a liquor licence contact Consumer and Business Services at www.cbs.sa.gov.au/contact or email LiquorAndGaming@sa.gov.au.

COVID Management Plan compliance

Ensuring compliance with the infection control measures stated within your COVID Management Plan will be the responsibility of the venue owner/activity coordinator.

SAPOL and SA Health staff will undertake unannounced site visits to assess and monitor compliance from time to time. Where a venue/activity neglects their responsibilities or are in wilful breach of their COVID Management Plan, they may be cautioned, fined, or the approval of your COVID Management Plan will be revoked. This may mean your venue or activity may not re-open until such time as:

- The areas of concern are addressed, and/or
- The COVID Management Plan is revised and resubmitted for assessment.
- Approval is obtained for the revised COVID Management Plan.

Note: SA Health understands that a COVID Management plan will not guarantee that COVID-19 will not be transmitted. An inherent risk of exposure of COVID-19 will always continue to exist and therefore, as circumstances change, so will our guidance to industry. Continued vigilance by all members of our community is essential.

Considerations for your COVID Management Plan

| COVID Management Plan Requirements | Example Control Measures |
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| Density | <ul style="list-style-type: none"> • Staff at entry points to manage patron/attendee numbers. • Signage to assigned rooms/areas on maximum numbers of patrons allowed. • Ticketing/pre-booking system to manage the number of arrivals and overall total numbers. • Use of temporary fencing for outdoor events to section areas for density control. • Assigned seating. • Limiting the duration of the activity or repeating it multiple times to maximise attendance but minimise total numbers at one time. |
| Distancing | <ul style="list-style-type: none"> • Floor markings to re-inforce distancing measures. • Dedicate separate entry and exit doors from separate rooms/areas, and pathways to encourage “one-way” traffic. • Minimise mixing between separate rooms/areas. • Floor markings to indicate predetermined dance spaces where groups are allocated. • Coloured wrist bands for social groups or allocated areas. • Seating to be placed to allow distancing between social groups. • Certain urinals not used to allow for distancing. Markings on bench urinals. • Signage and communication to re-inforce patron distancing messages. • Staggered entry and exit times to reduce congestion. • Consider physical barriers such as plexiglass screens in areas that involve high volume interactions. |
| Contact Tracing | <ul style="list-style-type: none"> • Advise patrons in advance of contact tracing requirements. • A mobile application to capture details for entry. • A logbook is maintained by staff at each entry and exit point. • Ticketing and pre-booking which requires contact tracing information. • Encourage and support downloading of COVID-Safe app. • A policy for patron non-compliance with tracing requirements. |

| COVID Management Plan Requirements | Example Control Measures |
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| <p>Staff and patron health and wellbeing</p> | <ul style="list-style-type: none"> • Pre-entry declaration via ticketing or on arrival. • Staff monitored for signs of symptoms. • Consider dividing staff into fixed teams or shifts that do not cross over to reduce the risk of transmission and the number of your staff that may need to isolate in the event of contact with a positive case at work. • Minimising contact between staff and delivery personnel. • Developing safe procedures to undertake bag checks etc. • Staff to complete mandatory COVID-19 training. |
| <p>Hygiene and Cleaning</p> | <ul style="list-style-type: none"> • Frequency of cleaning determined by the turn-over of patrons/attendees; the greater the turnover, the more cleaning is required. • Consider use of hand sanitiser stations in high-touch areas, and on entry and exit. • Frequency of cleaning relative to high-touch points (eg door handles, push plates, toilet facilities, backs of chairs, table tops, food preparation areas, EFTPOS facilities). • Contactless payment where possible. • Signage and communications to encourage personal hygiene. • Provision of hand drying facilities, i.e. paper towels or hand dryers only. • Ensuring all toilets have soap and running water for handwashing. |
| <p>Education and Information</p> | <ul style="list-style-type: none"> • Signage at the entry points explaining conditions of entry and personal responsibilities. • Social media to promote personal responsibilities and compliance requirements. • Announcements throughout the activity to remind patrons of responsibilities. |
| <p>Food and Beverage</p> | <ul style="list-style-type: none"> • Hand sanitising stations. • Pre-packaged food. • No shared food. |
| <p>Non-compliance and Incident Management</p> | <ul style="list-style-type: none"> • No entry for non-disclosure of information. • Ejection from premises for breaches of COVID-19 operating protocols. • Staff attending health incidents will wear protective equipment, e.g. gloves and masks. • Communicate publicly non-compliance consequences. • Process to manage in the event of suspected case for staff and patrons. |