

## Appendix 1



**Environment Department  
Port Health & Public Protection Division  
Commercial Environmental Health Service Plan 2023-24**

## Foreword

This year's Service Plan updates previous Committee reports, it builds on the recovery planning processes laid out over the last two years. It also takes into consideration the Food Standards Agency (FSA) plans for local authorities and the updates they have provided in terms of their modernisation programme.

The FSA Recovery Plans (the Plans) which took effect from 1 July 2021 ran through to April 2023. The Plans focussed on re-starting the regulatory delivery system in line with the Food Law Code of Practice (the Code) for the highest risk establishments, while providing greater flexibility for lower risk establishments.

The Plans set key milestones and we built our food regulatory service delivery around those. FSA have now determined that official food control delivery should be set to meet the full requirements of the Code including the more limited flexibilities still available for lower risk establishments. In considering delivery of appropriate interventions, we also remain mindful of the national changes to the food standards delivery model, expected to be introduced in 2023-24 and planned details on changes to the food hygiene delivery model, details of which are also expected this year. These are part of the overall modernisation programme planned by the FSA. The wider context has changed significantly too, with Government working on a new Borders Target Operating Model (BTOM) and the introduction of the Retained EU Law Bill. Both have placed additional resourcing demands on Government, despite recent announcements regarding further amendments to the latter.

In terms of our more detailed programme of work objectives for the whole Commercial Environmental Health team (i.e. not just food) these are outlined in further detail in this Service Plan. This latest version of the plan updates and refreshes the more detailed objectives and sets out what we plan to achieve in the coming year.

The City of London has now completed the final stages of realigning its services and implementing our target operating model to enable substantial organisational efficiencies.

**Gavin Stedman**  
**Port Health & Public Protection Director**

**May 2023**

## Introduction

The Commercial Environmental Health Team regulates food safety, occupational health and safety and some public health control arising from commercial businesses' activities for which we are the enforcing authority.

This plan has been prepared to accord with Food Standards Agency (FSA) and Health & Safety Executive (HSE) current frameworks on the planning and delivery of our services. As outlined in the foreword the food framework remains subject of further change as the FSA effects the modernisation programme, known as Achieving Business Compliance (ABC); the Recovery Plans reflect the transitions to new intervention delivery models for both food standards and food hygiene.

The delivery of our overall team goals and guiding principles will consider the various changes in these delivery models; the new food standards model is expected to be introduced this service year and details on the requirements of the food hygiene model are also expected. The current health and safety delivery model is driven by [LAC67-2 \(rev. 12\)](#)

Our plan is also guided by the City Corporation's Corporate Plan 2018-23 and the City & Hackney Joint Strategic Needs Assessment. It will consider the [revised Health and Wellbeing Strategy 2023-27](#) as this develops. Work on our next Corporate Plan (2025-2030) is also currently in development, with a narrative annex for 2024 to be added to the current 2018-23.

The current Corporate Plan outcomes on which we can have a direct impact are...

- Outcome 1: People are safe and feel safe.
- Outcome 2: People enjoy good health and wellbeing.
- Outcome 5: Businesses are trusted and socially and environmentally responsible.
- Outcome 6: We have the world's best legal and regulatory framework and access to global markets.
- Outcome 8: We have access to the skills and talent we need.
- Outcome 11: We have clean air, land and water and a thriving and sustainable natural environment.

Our team goals are that:

- We promote and support a risk based, goal setting regulatory regime.
- Higher risk activities are properly managed, and employers are committed to developing healthier workplaces
- Food is hygienically prepared, safe to eat and what it says it is;

- We regulate in a way that supports businesses to comply and where necessary evolve, whilst not losing sight of the integrity and assurance of safe food for consumers and safe workplaces needing to be at the heart of what we do.

Our guiding principles are:

- working with partners to make workplaces safer and healthier, providing a level playing field for responsible employers, by advising, promoting, and where necessary, enforcing good standards of risk control;
- developing services that contribute to improved management and control of risks, sharing our knowledge;
- continuing our dialogue and conversation with stakeholders to improve the service, always looking to provide simple, pragmatic advice and support;
- using the range of tools at our disposal effectively to influence duty holder behaviour and keep the interests of consumers at the heart of what we do;
- focusing our resources based on risk and using the range of tools at our disposal effectively
- ensuring our workforce is adequately resourced and experienced, enabling the service to fulfil the objectives set in the Department's Business Plan and this local Service Plan.

### **Resources, Service Delivery and Recovery- what's changed?**

In 2022/23 the new Target Operating Model for the City Corporation was implemented.

We are now in a transition phase for the new intervention delivery models for food. The FSA recognised in a recent [Board Paper](#) that during this period there would be a significant amount of work for LAs and the FSA to undertake in preparation. The FSA originally confirmed that the Recovery Plan priorities would continue to 2023-24 but have more recently indicated a return to full Code of Practice interventions.

We will be introducing a new management information system which goes live in this service plan year. Officers in the team were heavily involved in the transition work that was required in the latter part of 2022-23 but will now be freer to resume 'business as usual' activities. Revisions to food intervention models will however require further (major) changes to our systems to enable operation of the new standards risk matrix and to capture the revised data that will be required for reporting and KPIs, this will then likely be repeated for food hygiene.

We will continue to consider the best way to collect information on the Regulated activities that we need to perform, learning from some of the lessons acquired during the pandemic restrictions to ensure that we have as full a picture as possible.

Decisions about how and where we work are made gradually and deliberately, something we developed during the pandemic. The focus on productivity and effectiveness and a view towards building a more flexible workforce remains.

### **Performance and monitoring**

Our enforcement activity and certain key performance Indicators (KPIs) are reported to the Port Health & Environmental Services Committee along with other planned activities and key highlights, as part of the regular oversight of our work.

The four-monthly Committee reports include;

- The enforcement Activity undertaken for food safety and health and safety intervention work.
- A narrative update on any FHRs '0 rated' establishments.
- Highlighted activities undertaken in the relevant period.
- An FHRs premises profile of all food businesses in the scheme.
- Progress against certain performance indicators.

### **Service Plan objectives**

Our more detailed programme of work objectives for the Team are set out below. This latest plan updates and refreshes the more detailed objectives and sets out what we plan to achieve in the coming year.

| Objective   | Activities   |
|---|--|
| <p>1. <b>Manage the impacts as the regulatory landscape continues to evolve, including ongoing issues around; EU Transition; the FSA's ABC Programme; and our need to 'make adequate provision' for health and safety enforcement.</b></p>  | <ul style="list-style-type: none"> <li>▪ Continue to evaluate the impact of proposed new Regulatory regimes.</li> <li>▪ Continue to explore and develop our strategic networking; lobby and inform relevant stakeholders of the perceived impact of proposed workstreams, the framework programme as a whole and its likely effect on PH&amp;PP and them.</li> <li>▪ Prepare and align the Commercial EH Team to new regulatory frameworks for the delivery of food and health and safety and where relevant public health,</li> <li>▪ Strengthen and maintain long-term Member commitment to delivery of our duty as enforcers of workplace health &amp; safety.</li> </ul> |
| Outcome – Corporate Plan objectives are in <b>bold</b>  |  |
| <p><b>Outcome 5: Businesses are trusted and socially and environmentally responsible.</b></p> <p><b>Outcome 6: The best legal and regulatory framework- (6b.) we will help promote regulatory confidence and influence UK policy and regulation to protect and grow the economy.</b></p> <p>The Commercial EH Team continues to be aligned to take advantage of relevant new regulatory frameworks and is structured and designed so that it;</p> <ul style="list-style-type: none"> <li>• is dynamic enough to keep pace with the changes;</li> <li>• can harness new technologies and;</li> <li>• can adapt to future circumstances.</li> </ul> <p>Publicly committed to the HSE / Local Authority Statement of Commitment on health &amp; safety regulation and embed the principles within this service plan.</p> | <p><b>Responsibility</b></p> <p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health &amp; Safety)</p>  |

| Objective  | Activities  |
|--|---|
| <p><b>2. Deliver official food controls.</b></p> <p>Meet the revised service delivery expectations for LAs. <a href="#">An FSA Board Paper in August 2022</a> highlighted a number of challenges in Local Authority delivery. Since that time the FSA Recovery Plan has been revised and local authorities are encouraged to return to the interventions and intervals outlined in the <a href="#">Food Law Code of Practice</a></p> <p>Continue to prioritise planned interventions for high-risk category and non-compliant establishments in specific subordinate objectives and their activities. Lower risk premises will be returned to the programme using the guidance from FSA.</p> <p>To improve hygiene and standards compliance and reduce risks by focusing activity where non-compliance is identified and by undertaking appropriate follow-up and enforcement action.</p> <p>Manage any transition to the new food standards delivery model and plan similarly for the revised food hygiene model.</p> | <ul style="list-style-type: none"> <li>• Official controls are undertaken where the nature and frequency are prescribed in specific legislation and official controls recommended by FSA guidance are undertaken to support trade and enable export</li> <li>• Reactive work including; enforcement in the case of non-compliance, managing food incidents and food hazards, and investigating and managing complaints</li> <li>• Sampling in accordance with the local authority sampling programme or as required in the context of assessing food business compliance, and any follow-up necessary in relation to the FSA Surveillance Sampling Programme</li> <li>• Ongoing proactive surveillance to obtain an accurate picture of the local business landscape and to; identify open/closed/recently re-opened/new businesses; as well as businesses where there has been a change of operation, activities, or food business operator.</li> <li>• Prioritisation of 'new businesses' for intervention based on risk.</li> <li>• Responding to FHRS requested re-visits in line with the timelines specified in the FHRS Brand Standard for England.</li> </ul> |
| <p><b>Outcome – Corporate Plan objectives are in bold</b></p>  | <p><b>Responsibility</b></p>  |
| <p><b>Outcome 1: People are safe and feel safe.</b></p> <p><b>Outcome 5: Businesses are trusted and socially and environmentally responsible</b></p> <ul style="list-style-type: none"> <li>▪ We improve hygiene and standards compliance and reduce risks by focusing activity where non-compliance is identified and by undertaking appropriate follow-up and enforcement action.</li> <li>▪ Receive and investigate appropriately all requests for service, food incidents and complaints about food and food premises.</li> <li>▪ Ongoing proactive surveillance to obtain an accurate picture of the business landscape.</li> <li>▪ New businesses receive an appropriate and timely intervention.</li> <li>▪ Where required establishments receive an onsite intervention and are thereafter back in the system for interventions in accordance with the Food Law Codes of Practice.</li> </ul>  | <p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health &amp; Safety)</p>  |

| Objective  |                       | Activities   |               |  |                       |              |               |    |     |                         |   |    |                          |    |    |                                 |    |  |   |     |     |   |     |     |                                 |   |  |   |     |    |              |      |     |  |  |
|--|-----------------------|--------------|---------------|--|-----------------------|--------------|---------------|----|-----|-------------------------|---|----|--------------------------|----|----|---------------------------------|----|--|---|-----|-----|---|-----|-----|---------------------------------|---|--|---|-----|----|--------------|------|-----|--|--|
| <p><b>2a: Appropriate food hygiene interventions are completed. New and refreshed food hygiene ratings are given [where possible*].</b></p> <table border="1"> <thead> <tr> <th rowspan="2">Category</th> <th colspan="2">Interventions</th> </tr> <tr> <th>Due to end March 2024</th> <th>Done 2022-23</th> </tr> </thead> <tbody> <tr> <td>New (unrated)</td> <td>75</td> <td>158</td> </tr> <tr> <td>A (*due every 6 months)</td> <td>8</td> <td>12</td> </tr> <tr> <td>B (*due every 12 months)</td> <td>49</td> <td>83</td> </tr> <tr> <td>C (less than broadly compliant)</td> <td>15</td> <td></td> </tr> <tr> <td>C</td> <td>186</td> <td>260</td> </tr> <tr> <td>D</td> <td>648</td> <td>232</td> </tr> <tr> <td>D (less than broadly compliant)</td> <td>1</td> <td></td> </tr> <tr> <td>E</td> <td>225</td> <td>44</td> </tr> <tr> <td><b>Total</b></td> <td>1206</td> <td>789</td> </tr> </tbody> </table> |                       | Category     | Interventions |  | Due to end March 2024 | Done 2022-23 | New (unrated) | 75 | 158 | A (*due every 6 months) | 8 | 12 | B (*due every 12 months) | 49 | 83 | C (less than broadly compliant) | 15 |  | C | 186 | 260 | D | 648 | 232 | D (less than broadly compliant) | 1 |  | E | 225 | 44 | <b>Total</b> | 1206 | 789 | <ul style="list-style-type: none"> <li>▪ The Table in this objective shows all the hygiene inspections due to year end 2023-24. The figures indicated in red in the table in Objective 2d are higher risk premises.</li> <li>▪ All higher risk establishments receive an onsite intervention in accordance with the Food Law Codes of Practice.</li> <li>▪ New premises receive an appropriate intervention within 28 days of registration (or opening). This will be triaged if other higher risk work is required.</li> <li>▪ Lower (rated) risk premises are brought back into the programme and appropriate on-site interventions are completed where this is possible; the focus will be on larger/complex D rated establishments.</li> <li>▪ We will use Alternative Enforcement Strategies and other interventions to gather intelligence/information on all lower risk establishments – this includes those in category D - broadly compliant or better (FHRS 3, 4 or 5) for hygiene, and category B for standards.</li> <li>▪ When intelligence suggests risks have increased (irrespective of the risk category) we will undertake interventions to assess and address those risks<br/>The requirements on allergen labelling for products prepacked for direct sale will be considered at appropriate hygiene interventions rather than any separate food standards intervention. <b>[*Where an appropriate inspection/audit intervention has been completed].</b></li> </ul> |  |
| Category   | Interventions         |              |               |  |                       |              |               |    |     |                         |   |    |                          |    |    |                                 |    |  |   |     |     |   |     |     |                                 |   |  |   |     |    |              |      |     |  |  |
|  | Due to end March 2024 | Done 2022-23 |               |  |                       |              |               |    |     |                         |   |    |                          |    |    |                                 |    |  |   |     |     |   |     |     |                                 |   |  |   |     |    |              |      |     |  |  |
| New (unrated)  | 75                    | 158          |               |  |                       |              |               |    |     |                         |   |    |                          |    |    |                                 |    |  |   |     |     |   |     |     |                                 |   |  |   |     |    |              |      |     |  |  |
| A (*due every 6 months)  | 8                     | 12           |               |  |                       |              |               |    |     |                         |   |    |                          |    |    |                                 |    |  |   |     |     |   |     |     |                                 |   |  |   |     |    |              |      |     |  |  |
| B (*due every 12 months)   | 49                    | 83           |               |  |                       |              |               |    |     |                         |   |    |                          |    |    |                                 |    |  |   |     |     |   |     |     |                                 |   |  |   |     |    |              |      |     |  |  |
| C (less than broadly compliant)  | 15                    |              |               |  |                       |              |               |    |     |                         |   |    |                          |    |    |                                 |    |  |   |     |     |   |     |     |                                 |   |  |   |     |    |              |      |     |  |  |
| C  | 186                   | 260          |               |  |                       |              |               |    |     |                         |   |    |                          |    |    |                                 |    |  |   |     |     |   |     |     |                                 |   |  |   |     |    |              |      |     |  |  |
| D  | 648                   | 232          |               |  |                       |              |               |    |     |                         |   |    |                          |    |    |                                 |    |  |   |     |     |   |     |     |                                 |   |  |   |     |    |              |      |     |  |  |
| D (less than broadly compliant)  | 1                     |              |               |  |                       |              |               |    |     |                         |   |    |                          |    |    |                                 |    |  |   |     |     |   |     |     |                                 |   |  |   |     |    |              |      |     |  |  |
| E  | 225                   | 44           |               |  |                       |              |               |    |     |                         |   |    |                          |    |    |                                 |    |  |   |     |     |   |     |     |                                 |   |  |   |     |    |              |      |     |  |  |
| <b>Total</b>   | 1206                  | 789          |               |  |                       |              |               |    |     |                         |   |    |                          |    |    |                                 |    |  |   |     |     |   |     |     |                                 |   |  |   |     |    |              |      |     |  |  |



COMMERCIAL ENVIRONMENTAL HEALTH SERVICE PLAN 2023-2024

| Outcome   | Responsibility  |
|---|---|
| <ul style="list-style-type: none"> <li>▪ Complete the required risk-based food hygiene interventions:</li> <li>▪ All establishments in Phase 2 of the FSA Recovery Plan receive an onsite intervention per the above timetable</li> <li>▪ Higher risk new premises receive an intervention within 28 days of registration (or opening).</li> <li>▪ Target &gt;90% of other food establishments selected for an intervention are completed.</li> </ul> | Assistant Director (Regulation and Compliance)<br>Commercial EH Team Manager<br>Lead Officers (Food Safety and Health & Safety) |

| Objective   | Activities   |
|---|--|
| <p><b>2b: Focused follow up activity is conducted in food businesses that are not compliant [in the lower tiers of FHRS (0, 1 &amp; 2)]</b></p> <p>This is more important than ever as we emerge from the Coronavirus Pandemic, and we look to support the recovery of compliant businesses and protect consumers from non-compliant establishments</p> | <ul style="list-style-type: none"> <li>▪ Reinforce our intervention strategy with additional follow-ups, including visits, coaching and advice.</li> <li>▪ Use agreed national food safety managements systems such as “Safer Food, Better Business” where these are appropriate. Use on-site inspection reports and mobile working systems. Support the use of ethical business regulation principles.</li> <li>▪ Formal enforcement action will be informed by our current Policy Statement on Enforcement.</li> </ul> |

| Outcome –   | Responsibility  |
|---|---|
| <ul style="list-style-type: none"> <li>▪ Action is taken against food businesses that fail to fulfil their obligations.</li> <li>▪ Improving standards in riskier food businesses.</li> <li>▪ Reduction in the number of non-complaint food businesses through improved food hygiene performance and with the confidence this will be sustained.</li> </ul> | Assistant Director (Regulation and Compliance)<br>Commercial EH Team Manager<br>Lead Officers (Food Safety and Health & Safety) |

| Objective  | Activities  |
|--|---|
| <p><b>2c: Appropriate food standards interventions are completed</b></p> <p>We are responsible for verifying compliance with food law in the majority of food business establishments.</p> <p>The FSA anticipate that the new food standards model will help better target LA resources towards the highest risks. The new (currently pilot) model is set to ensure that the frequency of food standards controls is based on a better understanding of the level of risk a food business poses.</p> | <ul style="list-style-type: none"> <li>▪ The backbone of our regulatory work remains a targeted (risk-based) intervention program developed in accordance with national requirements.</li> <li>▪ All high-risk premises are rated in accordance with the existing intervention rating scheme in part 5 of the Food Law Code; all others including any overdue inspections are picked up when the next relevant Food Hygiene intervention falls due.</li> <li>▪ Reinforce our intervention strategy with additional follow-ups, including visits, coaching and advice. Formal enforcement action will be informed by our current Policy Statement on Enforcement.</li> </ul> |

| Outcome –   | Responsibility   |
|---|--|
| <ul style="list-style-type: none"> <li>▪ Action is taken against food businesses that fail to fulfil their obligations.</li> <li>▪ Improving standards in riskier food businesses.</li> <li>▪ Reduction in the number of non-complaint food businesses through improved food standards performance and with the confidence this will be sustained.</li> </ul> | Assistant Director (Regulation and Compliance)<br>Commercial EH Team Manager<br>Lead Officers (Food Safety and Health & Safety). |

| Objective   | Activities   |                          |             |   |   |                      |   |    |   |    |   |    |                          |   |     |                        |   |      |                         |    |  |              |             |  |  |
|---|--|--------------------------|-------------|---|---|----------------------|---|----|---|----|---|----|--------------------------|---|-----|------------------------|---|------|-------------------------|----|--|--------------|-------------|--|--|
| <p><b>2d: Maintain support for the national Food Hygiene Rating Scheme (FHRS)</b></p> <p>We will continue to support FHRS and any development of mandatory display and endeavour to complete interventions that enable an updated rating to be provided; keeping the system relevant for businesses and consumers.</p> <table border="1" data-bbox="165 804 1102 1145"> <thead> <tr> <th>FHRS Rating</th> <th>No premises</th> <th>Category, %</th> </tr> </thead> <tbody> <tr> <td>0</td> <td>3</td> <td rowspan="3">Non-compliant<br/>3.7</td> </tr> <tr> <td>1</td> <td>17</td> </tr> <tr> <td>2</td> <td>43</td> </tr> <tr> <td>3</td> <td>44</td> <td>Broadly compliant<br/>2.6</td> </tr> <tr> <td>4</td> <td>130</td> <td rowspan="2">Good or better<br/>93.7</td> </tr> <tr> <td>5</td> <td>1452</td> </tr> <tr> <td>Unrated/outside program</td> <td>80</td> <td></td> </tr> <tr> <td><b>Total</b></td> <td><b>1769</b></td> <td></td> </tr> </tbody> </table> | FHRS Rating  | No premises              | Category, % | 0 | 3 | Non-compliant<br>3.7 | 1 | 17 | 2 | 43 | 3 | 44 | Broadly compliant<br>2.6 | 4 | 130 | Good or better<br>93.7 | 5 | 1452 | Unrated/outside program | 80 |  | <b>Total</b> | <b>1769</b> |  | <ul style="list-style-type: none"> <li>▪ It is important for consumer and business confidence that the FHRS system remains credible and objective; <b>the central tenet of the scheme remains a risk-based intervention programme that meets the required FSA standard.</b></li> <li>▪ Consumers see mandatory display of ratings as a necessary part of any new regulatory model. Our intervention work will therefore endeavour to continue to establish compliance even in lower risk premises.</li> <li>▪ We will therefore consider adaptations to our interventions to ensure lower risk premises remain compliant. This will include interventions that allow formal rating, where this is possible.</li> <li>▪ We will support the re-rating visits according to <a href="#">the process outlined</a> on our website.</li> </ul> |
| FHRS Rating   | No premises  | Category, %              |             |   |   |                      |   |    |   |    |   |    |                          |   |     |                        |   |      |                         |    |  |              |             |  |  |
| 0   | 3  | Non-compliant<br>3.7     |             |   |   |                      |   |    |   |    |   |    |                          |   |     |                        |   |      |                         |    |  |              |             |  |  |
| 1   | 17   |                          |             |   |   |                      |   |    |   |    |   |    |                          |   |     |                        |   |      |                         |    |  |              |             |  |  |
| 2   | 43   |                          |             |   |   |                      |   |    |   |    |   |    |                          |   |     |                        |   |      |                         |    |  |              |             |  |  |
| 3   | 44   | Broadly compliant<br>2.6 |             |   |   |                      |   |    |   |    |   |    |                          |   |     |                        |   |      |                         |    |  |              |             |  |  |
| 4   | 130  | Good or better<br>93.7   |             |   |   |                      |   |    |   |    |   |    |                          |   |     |                        |   |      |                         |    |  |              |             |  |  |
| 5   | 1452   |                          |             |   |   |                      |   |    |   |    |   |    |                          |   |     |                        |   |      |                         |    |  |              |             |  |  |
| Unrated/outside program   | 80   |                          |             |   |   |                      |   |    |   |    |   |    |                          |   |     |                        |   |      |                         |    |  |              |             |  |  |
| <b>Total</b>  | <b>1769</b>  |                          |             |   |   |                      |   |    |   |    |   |    |                          |   |     |                        |   |      |                         |    |  |              |             |  |  |
| Outcome   | Responsibility   |                          |             |   |   |                      |   |    |   |    |   |    |                          |   |     |                        |   |      |                         |    |  |              |             |  |  |
| <ul style="list-style-type: none"> <li>▪ Improvements in the number of businesses that meet minimum compliance levels and, in the number, evidencing ‘very good’ standards of compliance.</li> <li>▪ We deliver the required (risk based) intervention programme outlined in this plan.</li> <li>▪ Food Business Operators want a 5 FHRS rating, they achieve it and then show it by displaying their sticker enabling customers to see that food safety is a top priority and foremost in their minds.</li> </ul>  | Assistant Director (Regulation and Compliance)<br><br>Commercial EH Team Manager |                          |             |   |   |                      |   |    |   |    |   |    |                          |   |     |                        |   |      |                         |    |  |              |             |  |  |

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|  |   |
|--|---|
| <ul style="list-style-type: none"> <li>The further development of the re-rating scheme is supported in the City as FHRS itself moves towards alignment with the ones in the devolved Governments of Wales and Northern Ireland (where FHRS is mandatory).</li> </ul> | Lead Officers (Food Safety and Health & Safety) |
|--|---|

| <b>Objective</b>  | <b>Activities</b>   |
|---|---|
| <b>2e: Develop and implement a risk-based food sampling programme</b>   | <ul style="list-style-type: none"> <li>Consider our Sampling Policy and local, regional, and national priorities utilising all intelligence available.</li> <li>Take part in relevant regional/national identified studies where we are able.</li> <li>Exchange intelligence and findings on sampling results using relevant local and national intelligence, a key element to a robust system of Official Food Controls.</li> <li>If requested, we will acknowledge and respond to any originating local food authority, in respect of inland referrals, confirming any action taken.</li> </ul> |
| <b>Outcome</b>  | <b>Responsibility</b>   |
| <ul style="list-style-type: none"> <li>Delivery of a risk-based sampling programme. This work was drastically scaled back during the pandemic, but the intention is to reinvigorate programmed sampling work in 2023-24 where it supports other workstreams.</li> <li>We comply with the FSA Data Standard for the collection of food and feed sampling intelligence.</li> <li>Contribute to relevant sampling projects selected by UKHSA and the public analyst services.</li> </ul> | Assistant Director (Regulation and Compliance)<br><br>Commercial EH Team Manager<br><br>Lead Officers (Food Safety and Health & Safety)   |

| Objective  | Activities  |
|--|---|
| <p><b>3. Ensure adequate arrangements are in place for the enforcement of health and safety.</b></p> <p><b>Focus on duty-holder business and activities where risks are highest</b></p> <p>Section 18(4) of the Health and Safety at Work Act etc. 1974 places a duty on Local Authorities to make ‘adequate arrangements for the enforcement’ of health and safety and the Code sets out what is meant by ‘adequate arrangements for enforcement’.</p> <p><b>Consider activities in the sectors identified in <a href="#">LAC 67/2 (rev 12)</a>;</b> Setting Local Authority Priorities and Targeting Interventions including local intelligence.</p> <p><b>Subordinate objectives and their activities are outlined in 3a-f below</b></p>  | <ul style="list-style-type: none"> <li>▪ Planned proactive health and safety interventions which focus on national priority topics;</li> <li>▪ Undertaking targeted initiatives based on local intelligence and evidence of risk;</li> <li>▪ Evidence-based education of employers, employees and contractors through guidance and information;</li> <li>▪ Promoting proportionate and sensible health and safety through business engagement and partnership working;</li> <li>▪ Undertaking and participating in health and safety promotion campaigns;</li> <li>▪ Working with and liaising with other internal stakeholders and external organisations</li> <li>▪ Devising material to help businesses comply with the law and promote good practice</li> </ul> |
| Outcome – Corporate Plan objectives are in <b>bold</b>   | Responsibility  |
| <p><b>Outcome 1: People are safe and feel safe.</b></p> <p><b>Outcome 2: People enjoy good health and wellbeing.</b></p> <p><b>Outcome 5: Businesses are trusted and socially and environmentally responsible.</b></p> <ul style="list-style-type: none"> <li>▪ <b>Planned interventions are evidence based.</b> Proactive inspection are only used for the activities in the sectors contained in the list of priority topic areas which is embodied in the National Code and <a href="#">LAC 67/2 (rev 12)</a>, or where there is local intelligence of failure to manage risk or for making it a specific local priority..</li> <li>▪ All reactive and proactive work is underpinned by local, regional, and national liaison. An appropriate mechanism for ensuring consistency between enforcers, for sharing good practice, for sharing information and for informing other enforcers of potential difficult situations</li> </ul> | <p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health &amp; Safety)</p>  |

| Objective  | Activities  |  |
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| <p><b>3a; Management of legionella in cooling towers.</b></p> <p>A Local Priority and Targeting Interventions including local intelligence. The risk of a Legionnaires’ disease outbreak affecting the Square Mile is considered an unacceptable public health and reputational risk, especially when compared with any perceived burden from our intervention activity.</p> <p>One hundred and twenty sites are due an intervention in the period to end March 2024. Fifty-two are in the higher risk categories and will receive an on-site intervention</p> | <ul style="list-style-type: none"> <li>▪ Proactive interventions are considered necessary based on local intelligence and following the considerable upheaval of the pandemic and potential impact on the management of legionella, e.g. building occupancy and use during various Lockdown iterations</li> <li>▪ Risk-based interventions at sites with cooling towers; revisits and enforcement action taken as necessary;</li> <li>▪ Review status of decommissioned tower sites and follow up accordingly.</li> <li>▪ Engagement with duty holders at new / proposed cooling tower sites: Advice to Principal Designers and Designers including at the pre-application or Planning Application stage of development.</li> <li>▪ Focus attention on sites that have:-                             <ul style="list-style-type: none"> <li>○ not yet demonstrated the ability to manage their Legionella risk in a sustained manner, and includes new cooling towers / evaporative condensers; and/or</li> <li>○ relevant enforcement action in the last 5 years and have not yet demonstrated sustained control of Legionella risk.</li> </ul> </li> <li>▪ Legionella Control Association attend quarterly meetings</li> <li>▪ Deliver training for inspectors on legionella and cooling towers (in conjunction with ALEHM and wider).</li> <li>▪ Host / support further professional development events for the regulatory and public health community.</li> </ul> |  |
| <b>Outcome –</b>   | <b>Responsibility</b>   |  |
| <p><b>Planned interventions are evidence based for cooling tower systems.</b> Proactive inspections are a reliable means of intelligence gathering. This type of intervention remains broadly supported by duty-holders who value our input and oversight</p>  | <p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health &amp; Safety)</p>  |  |

| Objective   | Activities   |  |
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| <p><b>3b; Electrical safety in hospitality settings.</b><br/>The Electricity at Work Regulation 1989 requires that any electrical equipment which has the potential to cause injury is maintained in a safe condition</p>   | <ul style="list-style-type: none"> <li>▪ Consider matters of evident concern and raise at on site food hygiene interventions.</li> </ul>           |  |
| Outcome –   | Responsibility   |  |
| <p><b>Planned interventions are evidence based.</b> Proactive inspection are only be used for the activities in the sectors contained in the list of priority topic areas which is embodied in the National Code and <a href="#">LAC 67/2 (rev 12)</a>, or where there is local intelligence of failure to manage risk.</p> | <p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health &amp; Safety)</p> |  |

| Objective  | Activities  |  |
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| <p><b>3c: Gas safety in commercial catering premises.</b><br/><br/>The proper installation, maintenance and inspection by a competent Gas Safe registered engineer is essential to ensuring that staff and customers at commercial catering premises are protected from exposure to carbon monoxide gas.</p>                 | <ul style="list-style-type: none"> <li>▪ <b>Gas safety in commercial catering premises.</b> The proper installation, maintenance and inspection by a competent Gas Safe registered engineer is essential to ensuring that staff and customers at commercial catering premises are protected from exposure to carbon monoxide gas.</li> <li>▪ Continue to survey food premises likely to be using solid fuel appliances (at the time they become due for an on-site food hygiene inspection).</li> <li>▪ Follow-up enforcement in premises where there are matters of evident concern</li> </ul> |  |
| Outcome  | Responsibility  |  |
| <p><b>Planned interventions are evidence based.</b> Proactive inspections are only be used for the activities in the sectors contained in the list of priority topic areas which is embodied in the National Code and <a href="#">LAC 67/2 (rev 12)</a>, or where there is local intelligence of failure to manage risk.</p> | <p>Assistant Director (Commercial Services)</p> <p>Commercial EH Team Manager</p>   |  |

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|  | Lead Officers (Food Safety and Health & Safety) |
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| Objective  | Activities   |
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| <p><b>3d: Crowd management &amp; injuries/fatalities to the public</b></p> <p>Event Safety / Crowd control at large scale public gatherings/ events remains a National Priority for 2023-24.</p> <p>The City Corporation host many high-profile events, and the City are also the enforcement authority for some of the larger higher risk events.</p> | <ul style="list-style-type: none"> <li>▪ Work with Licensing, Operational and Safety Planning Groups to better understand proposed event plans</li> <li>▪ Work as part of the City Corporation’s Safety Advisory Group (SAG) to advise on and help promote risk management and good practice with event organisers.</li> <li>▪ Visits to events to verify the application of appropriate risk control measures.</li> <li>▪ Where necessary intelligence is shared between appropriate stakeholders, e.g. City of London Police, London Fire, London Ambulance, City Corporation’s Highways service.</li> </ul> |
| Outcome  | Responsibility   |
| Lack of suitable planning, management and monitoring of the risks arising from crowd movement and behaviour as they arrive, leave, and move around a venue is addressed where this is necessary.   | <p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health &amp; Safety)</p>   |

| Objective   | Activities  |
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| <p><b>3e: All London Borough Health &amp; Safety Liaison Group (ALBHSLG)</b></p> <p>Under LAC67/2 LAs should consider whether they can gain regulatory efficiencies by planning activity collectively e.g. with members of their local LA liaison groups.</p> | <ul style="list-style-type: none"> <li>▪ Any planned activity programme formulated by ALBHSLG for 2023-24 will be considered and resourced appropriately.</li> <li>▪ Work with relevant signatories of the Work-related deaths protocol to clarify and set demarcation arrangements and promote cooperation.</li> </ul> |
| Outcome   | Responsibility  |
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| <ul style="list-style-type: none"> <li>Work with a potential range of agencies to develop partnership approaches that improve compliance and help duty-holders to manage health and safety.</li> </ul> <p><b>Note:</b> Planned project activity was paused following Coronavirus measures</p> | <p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health &amp; Safety)</p> |
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| Objective   | Activities  |
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| <p><b>3f: Reactive health and safety interventions</b></p>  | <ul style="list-style-type: none"> <li>Investigating reported accidents, occupational diseases and dangerous occurrences that meet the appropriate criteria for follow up;</li> <li>Responding to complaints and requests for service;</li> <li>Permissioning work;               <ul style="list-style-type: none"> <li>In MST premises (in liaison with Licensing colleagues);</li> <li>Asbestos notifications; and,</li> <li>Thorough examination (usually lift) reports;</li> </ul> </li> <li>Responding to consultations, e.g. from Licensing;</li> <li>Providing or signposting advice and information to duty holders;</li> <li>Prioritised and targeted health and safety promotional campaigns.</li> </ul> |
| Outcome – Corporate Plan objectives are in <b>bold</b>  | Responsibility  |
| <ul style="list-style-type: none"> <li><b>Incidents / Accidents:</b> a decision to investigate is made in accordance with the appropriate <a href="#">Incident Selection Criteria Guidance LAC 22/13<sup>1</sup></a></li> <li>Initial enquiries are completed to national guidelines: establishing or verifying key facts and further information to inform a decision on whether to investigate further and to what extent.</li> <li>Investigation and any follow-up enforcement action is taken in accordance with the HSE guidelines including the Enforcement Management Model (EMM)</li> </ul> | <p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health &amp; Safety)</p>  |

<sup>1</sup> Health & Safety Executive and Local Authorities Enforcement Liaison Committee (HELA) Incident Selection Criteria [www.hse.gov.uk/lau/lacs/22-13](http://www.hse.gov.uk/lau/lacs/22-13)



| Objective  | Activities  |
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| <p><b>4. Help promote and support the growth and successful delivery of workplace health and wellbeing in City businesses.</b></p> <p>Using:</p> <ul style="list-style-type: none"> <li>a. Promotion of the <a href="#">London Healthy Workplace Charter (external link)</a> a good practice framework aimed at improving the health and well-being of employees.</li> <li>b. Awareness raising of the work-related stress and mental health campaign '<a href="#">Working Minds</a>' this launched in November 2021 and is still running.</li> <li>c. The <a href="#">Healthier Catering Commitment (HCC)</a>, a voluntary scheme promoted by local authorities to help caterers and food businesses make simple, healthy improvements to their food. We spent time developing an enhanced HCC scheme for food businesses in the City of London and launched the scheme in 2019-20.</li> <li>d. Where appropriate we will align this work with the evolving public health agenda (including regulation) on food.</li> </ul> | <ul style="list-style-type: none"> <li>▪ Encourage sign up to the community Business Healthy network.</li> <li>▪ Encourage development and use of the good practice framework for the workplace charter.</li> <li>▪ Raise awareness of the work-related stress and mental health campaign. Signpost the '<a href="#">Working Minds</a>' campaign which is relevant to all businesses but is aimed particularly at SMEs and is encouraging employers and employees to use the five 'R' approach to: <ul style="list-style-type: none"> <li>○ make stress and mental health ROUTINE, as part of employee engagement</li> <li>○ REACH out to their colleagues,</li> <li>○ RECOGNISE the signs of stress,</li> <li>○ RESPOND to reduce the risk,</li> <li>○ REFLECT on how these experiences can be used to improve the workplace</li> </ul> </li> <li>▪ We still need to reinvigorate the HCC scheme and develop and promote the initiative anew in relevant food establishments.</li> <li>▪ Maintain and enhance our links with the pan London development of HCC.</li> </ul> |

| Outcome – Corporate Plan objectives are in <b>bold</b>  | Responsibility   |
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| <p><b>Outcome 2: People enjoy good health and wellbeing</b></p> <p>In October 2018, the City Corporation formally pledged to tackle obesity and promote healthier choices by signing the <b>Local Government Declaration on Sugar Reduction and Healthier Food</b>. Evidence suggests a healthy workforce can reduce sickness absence, lower staff turnover and boost productivity -good for employers, workers, and the wider economy.</p> <p>More food businesses are signed up to the HCC Award.</p> <p>Engagement with and buy in from, potential businesses using referral mechanisms, existing networks, and resources such as Public Protection Team Business Healthy initiative. Work is part of the City &amp; Hackney's Joint Health and Wellbeing Strategy, including mental health and is supported by the 'Business Healthy' initiative.</p> | <p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health &amp; Safety)</p> |

| Objective | Activities |
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| <p><b>5. Develop Primary Authority Partnership work</b></p> <p><b>Primary Authority enables businesses to form a legal partnership with one local authority, which then provides assured and tailored advice on complying with environmental health, trading standards and other regulations that local regulators must respect.</b></p> <p>The Regulatory Enforcement and Sanctions Act 2008, as amended by the Enterprise Act 2016 established Primary Authority as a statutory scheme.</p>   | <ul style="list-style-type: none"> <li>▪ Pursue our on-going Primary Authority Partnership (PAP) work, where benefits remain for the partnership.</li> <li>▪ Consider further PAPs where this is likely to be a good fit and we have the capacity and resource to help make the difference.</li> <li>▪ The enhanced development of our Primary Authority offering has not yet been pursued but we remain active in the development of individual partnerships and with the development of regional and sector specific national PA groups.</li> </ul> |
| <p><b>Outcome – Corporate Plan objectives are in bold</b></p>   |   |
| <p><b>Outcome 6 (6a): we will promote regulatory confidence founded on the rule of law.</b></p> <p><b>Outcome 8: We have access to the skills and talent we need.</b></p> <p><b>Outcome 9: We are digitally and physically well connected and responsive.</b></p> <p><b>Outcome 10: We inspire enterprise, excellence, creativity, and collaboration.</b></p> <ul style="list-style-type: none"> <li>▪ Improved support for businesses and economic growth to enable them to better manage their key health, safety, and food related risks.</li> <li>▪ Ensuring progress towards the Government's better regulation agenda, providing streamlined and improved regulation.</li> <li>▪ Increased Primary Authority work. With Increased income and enhanced reputation for the City of London.</li> <li>▪ Improved working with national and other regulators on the provision of specific advice.</li> <li>▪ Businesses that sign up to a Primary Authority partnership have access to reliable, timely and tailored regulatory advice.</li> </ul> | <p><b>Responsibility</b></p> <p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health &amp; Safety)</p>   |

| Objective  | Activities   |
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| <p><b>6. Further develop the Commercial EH Team in line with the agreed objectives.</b></p> <p>Focus on our people and work in collaboration with others.<br/>Produce training and development opportunities for peers.</p>  | <ul style="list-style-type: none"> <li>▪ Continue to develop and enhance the competency of our frontline professionals.</li> <li>▪ Further develop our succession and workforce plan and embed the Corporate mechanisms designed to support this process.</li> <li>▪ Develop further (suitable) training arrangements; job shadowing; mentoring and coaching: using the revised performance development approach in our Corporate appraisal process.</li> <li>▪ Specific training will be developed in line with the FSA and HSE competency frameworks.</li> <li>▪ Further develop agreed meat hygiene training for London authorities in association with peer organisations, allied universities and food professionals utilising Smithfield Market.</li> <li>▪ Further develop health &amp; safety training for peers</li> <li>▪ Continue to improve officers' awareness and understanding of business' needs, how to effectively communicate messages using a broad range of intervention strategies to influence the behaviour of organisations.</li> <li>▪ Continue to support apprentices and graduates.</li> </ul> |
| Outcome – Corporate Plan objectives are in <b>bold</b>   | Responsibility   |
| <p><b>Outcome 8: We have access to the skills and talent we need.</b><br/> <b>Outcome 9: We are digitally and physically well-connected and responsive.</b><br/> <b>Outcome 10: We inspire enterprise, excellence, creativity, and collaboration</b></p> <ul style="list-style-type: none"> <li>▪ Our workforce is adequately resourced and experienced, enabling the service to fulfil its key objectives.</li> <li>▪ We have a more efficient service and improved staff morale, resulting in a better service for our customers.</li> <li>▪ We are, and we remain an excellent, modern, and accountable regulator focused on delivering a better service for our customers.</li> <li>▪ Our workforce will be well led and experienced, enabling the service to fulfil the objectives set now and for the foreseeable future.</li> </ul> | <p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health &amp; Safety)</p>   |

| Objective  | Activities  |
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| <p><b>7. Further develop IT and information management systems and capabilities and improve our online service offer. Build on lessons learned during the pandemic</b></p> <p>The new Environment Department moves to the IDOX Uniform back-office system in late April 2023, replacing NEC M3 / Assure</p>  | <ul style="list-style-type: none"> <li>▪ The project to replace the two current back-office systems with one shared Uniform system is scheduled for completion in mid-2023.</li> <li>▪ We will continue to work collectively with the relevant Module Administrators/ Key People in order to embed and develop Uniform so that it matches the desired business processes of the team.</li> <li>▪ Work to further improve our digital customer services streamlining both internal and external processes to everyone's advantage*.</li> </ul> |
| Outcome – Corporate Plan objectives are in <b>bold</b>   | Responsibility  |
| <p><b>Outcome 9: We are digitally and physically well-connected and responsive.</b></p> <ul style="list-style-type: none"> <li>▪ Faster data and information capture, improved intelligence and targeting enforcement, more effective communication with businesses.</li> <li>▪ The existing Service delivers a streamlined, accessible format with a clear focus on customer requirements</li> <li>▪ The shared Uniform system will enable officers in different Divisions and their teams to share data more effectively and be sighted on the activities of the wider Department.</li> <li>▪ Reduce the administrative and reporting burdens that we place on our front line, professionals, while improving for the longer term the information and intelligence we gather to aid our operational planning. We will be better able to identify poor performing businesses and sectors.</li> <li>▪ More 'open data' provision is considered.</li> </ul> <p>*Activities still to include: Further Corporate website development; Online forms (inc. payments); use of the FSA food registration system; data gathering and development of data analytics (inc. the FSA work on performance management and segmentation); development of the Departments management information system (database)</p> | <p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health &amp; Safety)</p> <p>Module Administrators (for the shared Uniform system)</p>   |