



DEPARTMENT OF MARKETS & CONSUMER PROTECTION
PORT HEALTH & PUBLIC PROTECTION SERVICE

CITY OF LONDON COMMERCIAL ENVIRONMENTAL HEALTH TEAM PLAN 2018-2019

Introduction

The Commercial Environmental Health Team is responsible for regulating food safety (standards and hygiene), occupational health & safety, some statutory nuisances (not noise) and the investigation of certain infectious diseases arising from activities for which we are the enforcing authority. We are part of the Port Health & Public Protection Service (PH&PP) in the Department of Markets & Consumer Protection (M&CP).

Our work also includes food standards and certain health & safety interventions at Smithfield Market. The Feedstuffs (animal food) enforcement function in the City is carried out under contract through the Association of London Environmental Health Managers and as part of cross London delivery.

Details on the extent of the teams' work and our plans for 2018-19 are reported in the sections that follow. There are separate official control activities in the Port Health Service which has a separate Food Service Enforcement Plan.

This plan has been prepared to accord with Food Standards Agency (FSA) and Health & Safety Executive (HSE) frameworks on the planning and delivery of such services. It is also guided by the City Corporation's new Corporate Plan 2018-23, the City & Hackney Joint Strategic Needs Assessment and The City Joint Health and Wellbeing Strategy.

The organisation's is designed to be used as a strategic framework to guide thinking and decision-making and local Business Plans should demonstrably support this Corporate Plan. We will use it to identify where we need to innovate, with whom we can collaborate and how we can align and drive all our activities to achieve the greatest possible impact on the things we feel are important.

Our **main goals** are to help ensure that:

- Food is hygienically prepared, safe to eat and what it says it is;
- We promote and support a risk based, goal setting regulatory regime.
- Higher risk work activities are properly managed, employers are committed to developing healthier workplaces, contributing to better mental and physical health of City workers
- We regulate in a way that supports businesses to comply and grow 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.

Principles

Our guiding principles are:

- Working with partners to make food and workplaces safer and healthier, providing a level playing field for responsible employers with regulators and co-regulators, by advising, promoting, and where necessary, enforcing good standards of risk control;
- Developing services (and some products) 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.
- Use 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.
- Our workforce will be adequately resourced and experienced, enabling the service to fulfil the objectives set in our PH&PP Business Plan and this local plan.
- Encouraging and recognising improvements, being increasingly joined up to deliver improved outcomes and minimise unnecessary burdens on businesses;

Key Performance Indicators [KPI's]

Key performance Indicators (KPIs) are reported to our Port Health & Environmental Services Committee. As appropriate other planned activities and key highlights are reviewed and reported to Committee every 4 months as part of the regular oversight of our work.

<ul style="list-style-type: none"> ▪ Secure a positive improvement in the overall FHRS ratings profile for City of London food establishments. 	<p>Baseline profile as at 31st March 2013</p>
<ul style="list-style-type: none"> ▪ 75% food businesses inspected will receive a report/letter detailing the outcome of their inspection <u>within 5 working days</u> and the remainder <u>within 10 working days</u>. This will accord with standards within the FHRS system 	
<ul style="list-style-type: none"> ▪ All authorised Food Safety staff to receive/complete the necessary professional development with <u>at least 10 hours</u> CPD on Food Safety tailored to delivery of this Enforcement Plan; and to complete their RDNA assessment 	
<ul style="list-style-type: none"> ▪ To complete a risk-based intervention programme for all cooling towers systems within the year. 	

Regulation Policy

The City Corporation is committed to the principles of the [Regulators' Code](#), a statutory code for all regulators and PH&PP has its own [Policy Statement on Enforcement](#); last approved by the Port Health & Environmental Services Committee in September 2014. This policy will be reviewed this year.

Details of our planned activities and resourcing for them are in the following Appendices:

1. Official Food Controls
2. Health and Safety interventions
3. Background Information & Key Facts

Action	Activities	Outcome	Responsibility
<p>1. Manage the impacts on PH&PP from the developing regulatory landscape, including the FSA’s “Regulating Our Future” and EU Exit</p>	<p>Evaluate the impact of any new Regulatory regime and the UK’s relationship with the EU.</p> <p>Continue to explore and develop our strategic networking; lobby and inform relevant stakeholders of the potential impact of any new framework and the likely effect on PH&PP and them.</p> <p>Prepare and align the Commercial Team to the potential new regulatory framework for the delivery of food controls</p> <p>Consider proposals for maintaining protection of the public during any transition.</p>	<p>Apply our improved knowledge to anticipate and plan for future changes in regulation, business practice, consumer behaviour and food risk.</p> <p>The Commercial Team is aligned to take advantage of relevant new regulatory frameworks and is structured and designed so that it;</p> <ul style="list-style-type: none"> • is dynamic enough to keep pace with the changes; • can harness new technologies and; • can adapt to future circumstances. 	<p>Assistant Director (Public Protection)</p> <p>Commercial Team Manager</p> <p>Lead Officers (Food and Health and Safety)</p>

2. Promote and support workplace health and wellbeing: Including the [London Healthy Workplace Charter](#)

City Corporation Environmental Health Officers, where relevant, to advise on best practice and to signpost to support.

Seek Member approval to get a holistic Healthy Eating Strategy enshrined in the 2018/19 Food Safety Plan (JHWS Action Plan)'

This work has been Identified as a local priority.

- It is part of work in the City & Hackney's Joint Health and Wellbeing Strategy, includes mental health.
- Supports the City of London Suicide Strategy and Action Plan
- It is part of 'Business Healthy' initiative outputs and intelligence.

Best practice and signposting to support.

Develop a project with partners to evaluate sources of current advice so the relevant best practice is available and signposted.

Work to promote good practice and supporting businesses through advice, audits, London Healthy Workplace Charter, 'Business Healthy' initiative, web and social media.

Develop a holistic healthy eating strategy:

Consider a more overt link to Business Healthy and the London Healthy Workplace Charter and the Better Health for London Strategy.

Consider appropriate options for a healthy eating strategy appropriate to City food businesses including engagement with stakeholders.

Evidence suggests a healthy workforce can reduce sickness absence, lower staff turnover and boost productivity -good for employers, workers and the wider economy.

Engagement with and buy in from, potential businesses using referral mechanisms, e.g. GLA Healthy Workplaces Charter Team, existing CoLC networks and resources such as Dept. of Community & Children Services Public Health Team and the *Business Healthy* initiative.

<p>3. Develop our Primary Authority (PA) Partnership offering.</p>	<p>The Regulatory Enforcement and Sanctions Act 2008 established Primary Authority as a statutory scheme in which a local authority can partner with a business, or with a group of businesses, taking on responsibility for providing regulatory advice and guidance to them and for guiding the way in which they are regulated by all local authorities.</p> <p>Continue to develop existing PA Partnerships in Environmental Health.</p> <p>In October 2017 the Enterprise Act 2016 opened PA to any size of business, and prestart-ups, through an extension and simplification of the scheme. PH&PP have undertaken to consider further opportunities for Primary Authority Partnership work and how this should be developed. This will be assessed initially by an independent third party</p> <p>Leverage positive business behaviour changes applying a targeted risk-based approach to providing advice and support to relevant businesses.</p> <p>Contribute to the development of London Partnership opportunities.</p>	<p>Improved support for businesses and economic growth to enable them to better manage their key health, safety and food safety related risks.</p> <p>Increased Primary Authority work. With Increased income and enhanced reputation for the City of London. Improved working with national and other regulators on the provision of specific advice.</p> <p>Businesses that sign up to a Primary Authority partnership have access to reliable, timely and tailored regulatory advice.</p>	<p>Assistant Director (Public Protection)</p> <p>Commercial Team Manager</p> <p>All Team Members</p>
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<p>4. Further develop the Commercial Environmental Health service provision in line with the agreed objectives.</p> <p>Focus on development, our People and our work in collaboration with others.</p> <p>Enhance training and development opportunities; including where possible for peers.</p>	<p>Build on succession and workforce plans and proposals agreed in 2017-18 consider the regulatory landscape (and possible changes); succession planning; local issues.</p> <p>Develop arrangements for suitable training, job shadowing, mentoring and coaching.</p> <p>Develop specific training requirements and embed in the Appraisal process and the associated assessment and the requirements of this year's work program. The FSA and HSE competency frameworks will be part of the process.</p> <p>Develop agreed meat hygiene training for London authorities in association with peer organisations; allied universities and food professionals utilising Smithfield Market.</p> <p>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.</p>	<p>Become a better regulator, with improved business confidence in the Service we provide.</p> <p>We are, and we remain an excellent, modern and accountable regulator with improved staff morale focused on delivering a better service for our customers.</p> <p>Our workforce is well led and experienced, enabling the service to fulfil the objectives set now and for the foreseeable future.</p> <p>The three Chartered professionals who completed the ILM7 Leadership course are given opportunities to develop.</p> <p>We maintain and where necessary develop officer health and safety enforcement skills and competency across PH&PP to effectively implement the Commercial Team service plan and ensure an adequate response to incidents</p> <p>We develop skills for enhancing influence and impact including on 'harder to reach' businesses.</p> <p>We recruit and advance the development of two Graduate EHPs advancing their professional practice work.</p>	<p>Assistant Director (Public Protection)</p> <p>Commercial Team Manager</p> <p>Team Members</p>
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<p>5. Further develop our IT and information management systems and capabilities.</p> <p>Improve our online service offer, as well as supporting the Contact Centre to work more effectively.</p>	<p>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.</p> <p>Decide what time and attention is focussed on what areas to achieve the greatest benefit thus reducing the burden on compliant businesses.</p> <p>Work with the City Corporation’s chosen supplier to effectively improve our digital customer services contributing to the development of a Business Portal (through our Contact Centre and associated services), streamlining both internal and external processes to everyone’s advantage.</p> <p>Continue the iterative delivery based on user and customer’s needs; embed the approach, build capability and confidence and deliver services that enable users to excel.</p>	<p>Faster data and information capture, improved intelligence and targeting enforcement, more effective communication with businesses.</p> <p>The existing Service delivers a streamlined, accessible format with a clear focus on customer requirements</p> <p>We help build a system, so the right thing is the easy thing.</p> <p>We will be better able to better identify businesses and sectors and that sign up to the Portal.</p> <p>More ‘open data’ provision is considered so we can use the information we gather and systems more intelligently.</p>	<p>Assistant Director (Public Protection)</p> <p>Commercial Teams Managers</p> <p>Project Lead Officers</p>
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CITY OF LONDON CORPORATION - FOOD SAFETY ENFORCEMENT PLAN 2018-2019

The backbone of our regulatory work on Official Food Control remains a targeted (risk-based) intervention program developed in accordance with the requirements of the Food Law Code.

Rating profile Frequency of Hygiene Inspections (under Food Law Code)	Total number of premises, year				National FHRs ¹ Ratings	
	2014-15	2015-16	2016-17	2017-18	(2015-16)	(2016-17) 2017-18
A rated 6 monthly inspection	28	27	15	15	0	(15) (7) 5
B rated Annually	120	114	123	97	1	(60) (39) 30
C rated 18 monthly	514	493	518	477	2	(75) (76) 58
D rated Every 2 years	722	802	872	817	3	(141) (101) 96
E rated = Every 3 years	321	321	372	345	4	(325) (293) 271
Unrated / awaiting inspection	28	35	34	62	5	(1095) (1224) 1259
City Total	1733	1792	1934 ²	1885	Awaiting inspection	62
Outside program	49	42	42	72	Exempt / exc.	104
					% Premises rated FHRs 3 or more	94.5%, (89.7)³ (91.4)⁴ (93)⁵ 1885

1 [Guidance on the Food Standards Agency's national Food Hygiene Rating Scheme](#)

2 Includes premises that closed during the year

3 Percentage Compliant 2014-2015 (at year-end)

4 Percentage Compliant 2015-2016 (at year-end)

5 Percentage Compliant 2016-2017 (at year-end)

Rating profile Frequency of Hygiene Inspections (under Food Law Code)	Total number of premises, year				National FHS ¹ Ratings		
	2014-15	2015-16	2016-17	2017-18	(2015-16)	(2016-17)	2017-18
					(1777)	(1833)	(1866)

1. Food Hygiene inspections

Complete the required number of risk-based food hygiene inspections: Target >90% of food premises due and any overdue for intervention are inspected. New Premises receive an intervention within 28 days of registration (or opening).

Food Hygiene Inspections Rating and Frequency	<u>Done</u> 2014-15	<u>Done</u> 2015-16	<u>Done</u> 2016-17	<u>Done</u> 2017-18	DUE 2018-2019	Predicted commitment
A rated = Inspected 6 monthly	52	45	27	40	15	240 hours
B rated = Inspected annually	127	121	106	124	99	600 hours
C rated = Inspected 18 months	335	313	298	312	343	1352 hours
D rated = Inspected 2 yearly	313	462	342	347	512	2136 hours
E rated = Inspected ever 3 years	97	123	117	44	144	262 hours
Unrated / awaiting inspection	39	67	62	129	170	
Totals	963	1131	952	867	1283	4590 hours⁶
Approved premises	-	-	-	-	-	

⁶ Estimate based upon previous years

2. Food Standards inspections

All high-risk premises will be rated in accordance with the required intervention interval in part 5; all others including any overdue inspections will be picked up when the next relevant Food Hygiene intervention falls due.

Food Standards Inspections Rating and Frequency	Done 2014-15	Done 2015-16	Done 2016-17	Done 2017-18	DUE 2018-2019	Predicted commitment
A= Annually	1	1	0	1	1	-
B = Two yearly	97	78	97	56	192	-
C = Five yearly	175	373	240	169	507	-
Unrated					47	-
Outstanding					-	-
Total	372	457	337	239	747	500 hours⁷

3. To receive and investigate appropriately all requests for service, food incidents and complaints about food and food premises.

Identify and follow the most appropriate enforcement response in accordance with this plan our procedures and our enforcement policy

Complaints & Service Requests	2014-15	2015-16	2016-17	2017-18	Predicted commitment
	318	243	321	582 ⁸	665 hours⁹

⁷ Estimate based upon previous years experiences and factoring in the higher number of inspections due.

⁸ Increase due to the newly-introduced Food Standards Agency's (FSA) online reporting function, which directs consumer complaints straight to the relevant local authority.

⁹ Estimate based upon previous years' demand including experiences of triaging increased numbers received from the above new FSA process,

4. Follow up enforcement action in food premises.

Identify and follow the most appropriate enforcement response in accordance with this plan our procedures and our enforcement policy

	2014-15	2015-16	2016-17	2017-18	Predicted commitment
Reports with legal requirements	697	614	622	698	Inc. in Inspection Time quoted above.
Numbers of HIN's	15	10	5	5	7.5 per notice
Voluntary Closures	9	5	1	4	10 per premises
Emergency Prohibitions	0	1	1	0	70 hours per case Court action and case preparation are required. We seek to recover these costs
Legal Proceedings	0	0	0	0	2 weeks per case

Action	Activities and evidence	Outcomes	Responsibility
<p>5. Support the Food Hygiene Rating Scheme.</p> <p><i>We will continue to support the FHRs and the development of mandatory display. This is now a part of the "Regulating Our Future" Programme</i></p>	<p>It is important for consumer and business confidence that the FHRs system remains credible and objective; the central tenet of the scheme is our risk-based intervention programme.</p> <p>Consumers see mandatory display of ratings as a necessary part of any new regulatory model.</p> <p>We will consider adaptations to the national inspection scheme for lower risk premises using competent officers who are completing their Portfolio of Professional Practice.</p> <p>We will consider FSA proposals in respect of "Regulating our Future" as the move towards the planned regulatory changes due in 2019.</p>	<p>Public trust in food regulation - Improvements in the number of businesses that meet minimum compliance levels and in the number evidencing very good standards of compliance.</p> <p>We deliver the required risk based intervention programme outlined in this plan.</p> <p>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.</p> <p>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.</p>	<p>Assistant Director (Public Protection)</p> <p>Commercial Team Manager</p> <p>Commercial Team Members</p>
<p>6. Focused activity on Food Businesses that are not compliant in the lower tiers of FHRs (0, 1 & 2)</p>	<p>Reinforce our intervention strategy with additional follow-ups, including advisory visits and coaching sessions.</p> <p>Use agreed national food safety managements systems such as "Safe Food, Better Business" where these are appropriate.</p> <p>Use on-site inspection reports and mobile working systems.</p> <p>Support the use of ethical business regulation principles.</p>	<p>Action is taken against food businesses that fail to fulfil their obligations</p> <p>Improving standards in more risky food businesses.</p> <p>Reduction in the number of non-complaint food businesses through improved food hygiene performance and with the confidence this will be sustained.</p> <p>At the end of 2014-2015, 170 premises were rated 0,1 or 2 under FHRs the number of non-compliant businesses has declined consistently over the years and at the end of 2017-18, the figure is now 93.</p>	<p>Assistant Director (Public Protection)</p> <p>Commercial Team Manager</p> <p>Commercial Team Members</p>

Action	Activities and evidence	Outcomes	Responsibility
<p>7. Develop and implement a risk-based food sampling programme</p>	<p>Consider our Sampling Policy and local, regional and national priorities utilising all intelligence available.</p> <p>Develop an alternative to the soon-to-be-removed UKFSS system for recording, processing and reporting food samples as the FSA are withdrawing support for their national system</p> <p>Exchange intelligence and findings on sampling results using relevant local and national intelligence, a key element to a robust system of Official Controls</p> <p>If requested we will acknowledge and respond to any originating authority, in respect of inland referrals, confirming any action taken.</p>	<p>Delivery of a risk-based sampling programme.</p> <p>We comply with the FSA Data Standard (the replacement schema to UKFSS).</p>	<p>Commercial Team Manager</p> <p>Lead Sampling Officer</p>
<p>8. Work with the FSA on meat hygiene and standards and other initiatives at Smithfield Market.</p>	<p>Interventions including intelligence gathering exercises will be completed.</p> <p>Other initiatives included work on labelling and traceability and recalls</p>	<p>That all meat and meat products that are traded through the market are cut, stored, prepared and transport hygienically and safely and that there is traceability of all products from source to end-retailer</p>	<p>Assistant Director (Public Protection)</p> <p>Commercial Team Manager</p> <p>Senior Authorised Officer (Smithfield)</p>

Action	Activities and evidence	Outcomes	Responsibility
<p>9. Less Than Thoroughly Cooked Burgers</p>	<p>FSA guidance appeared in May 2016 and further follow-up was required with all known businesses offering Less Than Thoroughly Cooked (LTTC) burgers in an enforcement letter issued in November 2016; this work continues.</p> <p>Represent the City of London at the London group on LTTC burger provision</p> <p>Ensure food businesses and where applicable, their food safety consultants, understand and properly consider and apply the revised FSA guidance.</p>	<p>Improving standards in more risky food businesses,</p> <p>The City of London engages with those providing LTTC burgers, ensuring that our regulation is robust, credible and consistent and that the businesses understand their obligation to provide safe food.</p> <p>Businesses offering LTTC burgers understand and control their processes for producing this product safely.</p>	<p>Commercial Team Manager</p> <p>Lead Officer</p> <p>Commercial Team Members</p>
<p>10. To protect consumers from food fraud.</p>	<p>Consider the most appropriate means of disrupting and deterring criminal activity.</p>	<p>The selection of incidents for further investigation follows our current procedure which itself is informed by any specific criteria from national and co-regulators which we may be obliged to follow or consider at the time.</p>	<p>Assistant Director (Public Protection)</p> <p>Commercial Team Manager</p>

Action	Activities and evidence	Outcomes	Responsibility
<p>11. Special Events; the co-ordination and control of risks.</p>	<p>We will continue to engage with the organisers of open-air trading events that take place on private land to ensure that food businesses that come into the City are properly scrutinised¹⁰.</p> <p>Work with other City Corporation Departments on special/outside events with site visits as necessary inc. follow-up action taken where required.</p> <p>Contribute to the auditing of contract catering businesses on the Remembrancer's Approved List of Caterers.</p>	<p>We liaise with the organisers of events and with other food authorities to avoid 'over and under' regulation of mobile vendors legally plying their trade.</p> <p>We look at the food safety performance of Guildhall caterers at catered events as part of our Official Food Controls work</p> <p>We will complete the agreed round of audits of the facilities and management systems of the approved Guildhall caterers.</p>	<p>Assistant Director (Public Protection)</p> <p>Commercial Team Manager</p>
<p>12. Investigation of incidents of infectious disease and non-infectious environmental hazards.</p>	<p>Reactive investigations are conducted using our procedures and following the agreed protocols</p>	<p>Incidents and notification from Public Health England are followed up using the agreed protocols.</p> <p>Our service is appropriately resourced to enable this work to be completed properly.</p>	<p>Assistant Director (Public Protection)</p> <p>Commercial Team Manager</p>

¹⁰ "Pop up" style vendors now receive public acclaim in parts of London and when properly vetted, contribute to a vibrant Street Scene in the City of London

Action	Activities and evidence	Outcomes	Responsibility
13. Sustainable Food Waste food reduction	<p>Raising awareness:</p> <p>WRAP Resource '<i>Your Business is Food, don't throw it away</i>' is a tried and tested resource designed to help food businesses reduce the amount of food they throw away, thereby saving money and boosting profits.</p> <p>Work in partnership with our Cleansing Service colleagues in their Recycling Team and with businesses</p>	<p>Small changes leading to big differences for the food businesses we work with; from embedding food waste prevention, reducing surplus food and recycling of inedible food waste in their processes to healthy sustainable eating.</p>	<p>Commercial Team Manager</p> <p>Lead Officer</p>

CITY OF LONDON CORPORATION - HEALTH & SAFETY INTERVENTION PLAN 2018-2019

PRO-ACTIVE INTERVENTIONS		
Activity	Rationale for intervention: evidence identifying concern and priority	Planned activity or resource
<p>1. Control of legionella: interventions in cooling towers and other at-risk water systems.</p> <p>2. Provision of related training / work experience / contribution to regulatory and educational community</p>	<p>Remains a high-risk sector in HSE National Priorities (2018-19)</p> <p>We currently have 162 cooling towers sites in the City¹¹. According to HSE National Priorities premises that are non-compliant can remain subject to proactive inspections which includes premises that have:-</p> <ul style="list-style-type: none"> not yet demonstrated the ability to manage their legionella risk in a sustained manner, includes new cooling towers/evaporative condensers; and/or relevant enforcement action in the last 5 years and have not yet demonstrated sustained control of Legionella risk. <p>Inspection of all our sites remains a local priority, previously endorsed by City of London Port Health & Environmental Service Committee. 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. Cooling towers are being installed on new developments each year; The number of 'live' sites on our system increased by 18 last year. We have noted issues with the design of some new installations affecting Legionella risk and work at height, another City Corporation priority. We have an established intervention protocol and a Cooling Tower Inspection mobile working app has been developed to aid our work.</p>	<p>Risk-based interventions due at 86 sites with cooling towers; revisits and enforcement action taken as necessary; review status of decommissioned tower sites and follow up accordingly. 86 sites at 5hrs per site = 430 hrs;</p> <p>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. Estimated time = 70 hrs</p> <p>Working Group: London Boroughs, PHE and HSE to revisit the London outbreak response protocol;</p> <p>Legionella Control Association Attend quarterly meetings</p> <p>Deliver training for inspectors on legionella and cooling towers (in conjunction with ALEHM).</p> <p>Host / support further professional development events for the regulatory and public health community.</p> <p>Develop the iAuditor inspection protocol. Estimate time = 122.5hrs</p> <p><u>Estimated Total Time = 622.5 hrs</u></p>

¹¹ As at 25th April 2018

Activity	Rationale for intervention: evidence identifying concern and priority	Planned activity or resource
<p>3. Event Safety / Crowd control at large scale public gatherings/ events</p>	<p>Large scale events remain a National Priority for 2018-19.</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> <p>Intelligence is shared between the Met and City of London Police, LFCDA, London Ambulance, Highways, etc.</p> <p>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 needs to be addressed where this is necessary.</p>	<p>Work with Licensing, Operational and Safety Planning Groups to better understand proposed event plans</p> <p>Work as part of the City's Safety Advisory Group (SAG) to advise on and help promote risk management and good practice with event organisers.</p> <p>Visits to events to verify the application of appropriate risk control measures. Follow-up action taken as necessary.</p> <p>Estimated time:</p> <p><u>Estimated Total Time = 105 hrs</u></p>
<p>4. Falls from Height related to external building cleaning and servicing</p> <p>Building on valuable work carried out in 2014-17 and in response to demand from businesses and intermediaries.</p>	<p>Large number of sites where external Working At Height (WAH) is carried out.</p> <p>Local intelligence and observations indicate areas of concern and problems with compliance. This has been endorsed by others in the facilities management, 'access' design and operations community,</p> <p>Hazards and risks high: Poor practices, poor design, poor awareness by duty-holders: information from:</p> <ul style="list-style-type: none"> - findings of advisory visits and training sessions; - views of reputable members of the building access industry through 1-2-1 discussions, meetings and training events. <p>Building managers usually keen to understand the risks and receptive to awareness raising - e.g. popularity of recent videos and face to face training we have provided. The City of London Falls from Height campaign has been 'showcased' by the Health & Safety Executive as an example of good practice.</p>	<p>Develop a longer term 'Working At Height' strategy.</p> <p>Continue to engage with policy makers such as the All Party Parliamentary Group (APPG) on Working At Height.</p> <p>Awareness raising, working with stakeholders, providing training, use of social and web-based media:</p> <ul style="list-style-type: none"> ▪ Further develop and enhance the Work at Height web-based offering for stakeholders: ▪ Complete a number of further training events and briefings to interested parties (facilities managers etc) ▪ Further develop and publish procedures/advice to Principal Designers and Designers including at the pre-application or Planning Application stage of development. <p><u>Estimated Total time= 210hrs</u></p>

Activity	Rationale for intervention: evidence identifying concern and priority	Planned activity or resource
<p>5. Commercial catering premises using solid fuel cooking equipment</p>	<p>Gas safety in commercial premises associated with solid fuel cooking equipment is an HSE National Priority.</p> <p>Project work in London in 2017-18 suggested material breach rates were high.</p>	<p>Complete the survey of food premises likely to be using solid fuel appliances.</p> <p>Follow-up enforcement in premises where there are matters of evident concern:</p> <p><u>Estimated Total Time = 105hrs</u></p>

REACTIVE INTERVENTIONS

Activity	Rationale for intervention: evidence identifying concern and priority	Planned activity or resource
<p>1. Notifications under RIDDOR, LOLER and for Asbestos</p> <p>2. Complaints and service requests</p> <p>3. Massage and Special Treatment Licenses</p>	<p>Incidents / Accidents: decision to investigate: in accordance with the Incident Selection Criteria Guidance LAC 22/13¹²</p> <p>Evidence obtained during the investigation that health and safety management compliance by the duty holder is of concern across a range of higher risk activities.</p> <p>Massage and Special Treatment (MST) Licences – new premises inspections and annual licence renewal inspections</p>	<p>Initial enquiries: establishing or verifying key facts and further information to inform decision on whether to investigate further and if so to what extent</p> <p>Investigation and any follow-up enforcement action taken in accordance with Enforcement Management Model (EMM)</p> <p>Accidents, Incidents, Notifications Estimated time = 105 hrs</p> <p>All complaints, service requests and Notifications Estimate time = 70 hrs</p> <p>MST interventions: Estimated time = 55 hrs</p> <p><u>Estimated Total Time= 230hrs</u></p>

12 Health & Safety Executive and Local Authorities Enforcement Liaison Committee (HELA) Incident Selection Criteria www.hse.gov.uk/lau/lacs/22-13

WHO ARE WE?

Human Resources	1 x Assistant Director (0.25 FTE) 1 x Commercial EH Team Manager (1.0 FTE) 8 x EHOs (7.8 FTE) 1 x Senior Authorised Officer (Smithfield Market)(1.0 FTE)
Financial Resources¹³	2017-18 = £829,000 gross. 2018-19 = £850,000 gross
Operational Hours & Contacts	<p>Office hours Monday to Friday - 0900-1700 hrs</p> <p>Out of Office Hours - 24/7 cover is provided for all environmental health matters by the Dept. of Built Environment's Street Environment Team with an on-call Duty Environmental Health Manager for all alerts, emergencies or incidents.</p> <p>All calls 24/7 to: 020 7606 3030</p>
Location	<p>Port Health & Public Protection Service Walbrook Wharf 78-83 Upper Thames Street London EC4 R 3TD</p> <p>(Nearest Tube: Cannon Street)</p>

Profile of the Local Authority

The City of London Corporation is an unusually diverse organisation that supports and promotes the City as the world's pre-eminent financial centre and provides local government and police services for the "Square Mile". It also provides valued services to London and the nation including management of Guildhall Art Gallery, the Barbican Centre, the Central Criminal Court at the Old Bailey, 4,240 hectares of open space, three wholesale food markets and acts as London's Port Health Authority. The City's daytime working population is now approaching 400,000 with people working in many different business sectors but largely concentrated in financial services and the law. The City is also a popular destination for visitors, especially around St Paul's Cathedral and there are estimated to be over 10,000 visitors each day to the City.

¹³ The Commercial EH Team's planned budget does not include any income from various charges or costs levied

There are reminders of the City's past in its markets such as Smithfield and Leadenhall, but other industries have grown to service the needs of the businesses and people who work in the City including the provision of food with over 20,000 working in the accommodation and food services sectors. Retail developments including food outlets are expanding in the City and 2017 saw the opening of further retail spaces in and around the Bloomberg site and around Leadenhall Market.

Smithfield Market is the largest wholesale meat market in the UK with over 40 separate establishments approved to operate from the Market in respect for which the City Corporation is the enforcing authority for food standards, with the Food Standards Agency the enforcing authority for food hygiene.

What do we do? - Food Safety

The Commercial Team inspect premises for food hygiene, safety and food standards. Interventions are based on risk and inspection frequencies calculated using the FSA'S Food Law Code of Practice¹⁴; follow-up interventions are determined on the extent of an establishment's legal compliance. Officers carrying out Food Hygiene inspections consider the application of the law and appropriate FSA guidance such as the *E. coli* guidance as part of their overall assessment of compliance.

Follow-up interventions are a requirement of the Code with the purpose being two-fold: -

- a) to support those willing to make improvements; and
- b) to regularly monitor those who have previously been unable to maintain the required standards between full inspections.

Other interventions, not classed as an audit or an inspection, will continue and include sampling visits and visits to check compliance after complaints and to check progress on implementing remedial action following an inspection.

Applicable food businesses are rated using the national Food Hygiene Rating Scheme (FHRS). The City was an early adopter of ratings available to the public. We have used FHRS since April 2012 and all ratings are available on line. The Commercial Team continues to promote FHRS to ensure the public know how to determine how well a food business performs in terms of food hygiene. Premises rated 0, 1 or 2 in the FHRS receive additional interventions; this is based on work done with poor performing businesses in the City and elsewhere which continues to show success in maintaining or improving compliance through regular face to face contact.

¹⁴ [Food Law Code of Practice](#) updated March 2017 and due for further revision in 2018 as part of Regulating our Future.

Each new food business receives an intervention to assess their compliance with the relevant legislation. We endeavour to do so within 28 days of their opening and then the business will be risk-rated to trigger future inspections. The Teams also consider appropriate health & safety interventions during some food controls, including those in new premises and this work is included in the current year's Health & Safety Intervention Plan for the City.

What do we do? - Health & Safety

The City Corporation are the enforcing authority for health and safety in most workplaces within the City of London. Whilst many employees in the City do not face significant health and safety hazards as part of their day to day work, there remain a number of high risk *work related* activities such as operation of cooling towers (legionella risks), window cleaning or maintenance/engineering work required to keep City workplaces and businesses functioning. There are significant numbers of City workers who are at risk of ill health as a result of work related stress.

We endeavour to focus interventions in areas where we might best influence decision making on risks. We plan a mix of proactive, evidence-based interventions steered by national and local priorities relevant to the City and described in detail above. Our work also involves providing advice and support to businesses on sensible and proportionate risk management to comply with their legal obligations and includes working with building designers. We also promote award schemes such as the Mayor of London's Healthy Workplaces Charter, as part of our programme on improving workplace health and wellbeing, including work related stress.

Some of our health and safety enforcement intervention work is recognised nationally and internationally in areas associated with cooling towers and work at height on tall buildings.

Advice to Businesses, Regulators and the Primary Authority Scheme

Advice to businesses is an integral part of the service we provide including some with a national and international profile. We also provide advice and training to other UK local enforcement authorities. We endeavour to engage with certain business premises at their design stage when they come to our attention, e.g. through the City's Planning, Building Control and Licensing functions. We encourage businesses to use web-based resources to help answer initial enquiries. We use a variety of media to engage with business including Twitter to help us understand businesses and customers' needs. We use You Tube to disseminate advice and guidance.

The Commercial Teams have Primary Authority Partnerships for food safety and/or health & safety work with eight national organisations in the property management, health & fitness, retail, pet retail and contract catering sectors, further information can be found on the [Primary Authority Register](#).

Food and Feedstuffs Sampling

The City Corporation is an active contributor to national and regional sampling programs and its sampling program is developed with our neighbours in the SE London Food Group and through the pan-London Food Co-ordinating Group. Both groups include representatives from Public Health England and the Public Analysts so as to develop a sampling plan that considers co-ordinated programs as well as any locally important issues.

Control and Investigation of Outbreaks and Food Related Infectious Disease

The City Corporation works with Public Health England's North East & North Central London Health Protection Team to investigate outbreaks and selected infectious disease notifications. Health Protection legislation in England has adopted an "all hazards" approach, and in addition to a specified list of infectious diseases in that legislation, there is a requirement to notify cases of other infections or contaminations which could present a significant risk to human health. Local authorities like the City Corporation, have powers and duties to prevent and control risks to human health from infection or contamination, including by chemicals and radiation.

Liaison with Other Organisations

The City is an active member of London regulatory networks for both food safety and health and safety, linking with government agencies at regional and national level (Food Standards Agency, Health and Safety Executive, Public Health England). We represent the City at local and national forums and networks where these increase our influence on and understanding of the communities we regulate. At Smithfield Market we regularly liaise with the FSA, their national contractor Eville & Jones and the Smithfield Market Tenants Association as well as our Market Superintendent and their staff.

Staff Development Plan

Staff development is managed through the City Corporation's Performance & Development Framework (P&DF) and our procedures which also consider the national Regulator's Development Needs Analysis tool and the Continuing Professional Development requirements for Environmental Health Practitioners (EHP) as members of the Chartered Institute of Environmental

Health and Institute of Occupational Safety & Health etc. are taken also into account¹⁵. Many of our officers are Chartered members of one or both institutes. We plan to engage Graduate EHPs in the Department

Quality Assessment and Internal Monitoring

Monitoring links individual officers' work directly to this Plan and the overall aims and objectives of the organisation. The workload monitoring process ties in with appraisal objectives and meetings are held with officers to monitor how objectives are proceeding. These also consider all enforcement action taken and the officer's interaction with individual businesses [168 hours pa].

There are also regular weekly team briefings and meetings [380 hours pa] and finally we support the London SE Food Sector and London SE Health & Safety Quadrant's work that reviews the arrangements that are in place to meet our service obligations in these areas [72 hours pa Food, 17.5 hours pa H&S].

¹⁵ Under the Food Law Code of Practice, all officers undertaking Official Control of Foodstuffs enforcement work must complete a minimum of 10 hours Food-related CPD each year.