



**Department of Markets & Consumer Protection
Port Health & Public Protection Division
Commercial Environmental Health Team Plan**

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 Division (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 model.

Details on the extent of the team's work and our plans for 2019-20 are reported in the sections that follow. There are separate Official Food Control Activities in the Port Health Service which has a separate Food Service Enforcement Plan. In the course of 2018-19 the majority of the river vessels we inspected for food safety were handed back to the Port Health Service and the majority earmarked for an alternative enforcement strategy (as they are low risk for food hygiene)

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 [Corporate Plan 2018-23](#), the [City & Hackney Joint Strategic Needs Assessment](#) and [The City Joint Health and Wellbeing Strategy](#).

The Corporate plan is designed to be used as a strategic framework to guide thinking and decision-making. 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.

Some of our planned initiatives can be completed quickly, while others need medium or long-term commitment¹.

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 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;
- ensuring 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 Service Plan; and
- encouraging and recognising improvements, being increasingly joined up to deliver improved outcomes and minimise unnecessary burdens on businesses.

¹ <https://www.local.gov.uk/our-support/efficiency-and-income-generation/demand-management/tools-and-techniques-managing-demand>

Key Performance Indicators [KPI's]

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

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|---|
| <ul style="list-style-type: none">▪ Continue to secure a positive improvement in the overall Food Hygiene Rating Scheme profile for City of London food establishments from a baseline profile as at 31st March 2013 |
| <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 in the FHRS system (the 'brand' standard) |
| <ul style="list-style-type: none">▪ All authorised officers to receive/complete the necessary professional development with <u>at least 10 hours</u> CPD on Official Food Controls, tailored to delivery of this Service Plan. |
| <ul style="list-style-type: none">▪ To complete a risk-based intervention programme for 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 January 2019.

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

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

Everything we do is aimed towards contributing to the achievement of the Outcomes in the Corporate Plan 2018-2023

Action	Activities	Outcome – Corporate Plan objectives are in bold	Responsibility
<p>1. Manage the impacts on PH&PP as the regulatory landscape continues to evolve, including issues around EU Exit and the FSA's "Regulating our Future" (RoF) programme</p>	<p>Continue to evaluate the impact of proposed new Regulatory regimes, including the UK's relationship with the EU.</p> <p>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&PP and them.</p> <p>Prepare and align the Commercial EH Team to the potential new regulatory framework for the delivery of (Official) Food Controls,</p> <p>Strengthen and maintain long-term Member commitment to delivery of our duty as enforcers of workplace health & safety.</p> <p>Contribute to workstreams designed to develop the RoF programme; this has occurred in the:-</p> <ul style="list-style-type: none"> • review of food standards; • registration of food premises; • development of UKFSS; • gathering of inspection data designed to inform 'segmentation' and performance monitoring <p>Consider proposals for maintaining protection of the public during any transition.</p>	<p>Outcome 5: Businesses are trusted and socially and environmentally responsible.</p> <p>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.</p> <p>The Commercial EH 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>Publicly commit to the HSE / Local Authority Statement of Commitment on health & safety regulation and embed the principles within this service plan.</p>	<p>Assistant Director (Public Protection)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>

Action	Activities	Outcome – Corporate Plan objectives are in bold	Responsibility
<p>2. Promote and support workplace health and wellbeing: Including the London Healthy Workplace Charter <i>City Corporation Environmental Health Officers, where relevant, to advise on best practice and to signpost to support. Further develop and implement a Healthy Eating Strategy</i></p>	<p>In October 2018 the City Corporation formally pledged to tackle obesity and promote healthier choices by signing the Local Government Declaration on Sugar Reduction and Healthier Food.</p> <p>Work is part of the City & Hackney's Joint Health and Wellbeing Strategy, including mental health and is supported by the 'Business Healthy' initiative.</p> <p>Develop our healthy eating strategy through closer links to Business Healthy and the London Healthy Workplace Charter, Better Health for London and the Healthy Catering Commitments scheme, which is in use in many London Boroughs.</p> <p>Select and develop options appropriate to City food businesses include further engagement with stakeholders, identifying best practice and signposting them to support.</p> <p>Develop the London Healthy Workplace Charter project with partners so the relevant best practice is available and signposted.</p> <p>Develop an app with CityWell for workplace mental health and wellbeing.</p>	<p>Outcome 2: People enjoy good health and wellbeing. Outcome 8: We have access to the skills and talent we need.</p> <p>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>Engagement with and buy in from, potential businesses using referral mechanisms, e.g. GLA Healthy Workplaces Charter Team, existing networks and resources such as Dept. of Community & Children Services Public Health Team and the Business Healthy initiative.</p>	<p>Assistant Director (Public Protection)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>

Action	Activities	Outcome – Corporate Plan objectives are in bold	Responsibility
<p>3. Primary Authority Partnership work².</p> <p><i>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.</i></p>	<p>The Regulatory Enforcement and Sanctions Act 2008, as amended by the Enterprise Act 2016 establish 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>In addition to our on-going Primary Authority Partnership work, in late 2017-2018, a research report was commissioned to explore development of an enhanced Primary Authority offering and we will seek to further develop the recommendations and opportunities that flow from the report.</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>Outcome 6 (6a): we will promote regulatory confidence founded on the rule of law.</p> <p>Outcome 8: We have access to the skills and talent we need.</p> <p>Outcome 9: We are digitally and physically well-connected and responsive.</p> <p>Outcome 10: We inspire enterprise, excellence, creativity and collaboration.</p> <p>Improved support for businesses and economic growth to enable them to better manage their key health, safety and food related risks.</p> <p>Ensuring progress towards the Government's better regulation agenda, through providing streamlined and improved regulation.</p> <p>Increased Primary Authority work with Increased income and enhanced reputation for the City of London.</p> <p>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 EH Team Manager</p> <p>All Team Members</p>

² In 1 October 2017 the Enterprise Act 2016 comes into force, Primary Authority is now open to any size of business, and prestart-ups, through an extension and simplification of the scheme

Action	Activities	Outcome – Corporate Plan objectives are in bold	Responsibility
<p>4. Further develop the Commercial EH Team in line with the agreed objectives.</p> <p>Focus on our people and work in collaboration with others.</p> <p>Produce training and development opportunities for peers.</p>	<p>Continue to develop and enhance the competency of our frontline professionals.</p> <p>Further develop our succession and workforce plan and embed the Corporate mechanisms designed to support this process.</p> <p>Develop further training arrangements; job shadowing; mentoring and coaching; using the revised performance development approach in our Corporate appraisal process.</p> <p>Specific training will be developed in line with the FSA and HSE competency frameworks.</p> <p>Further develop agreed meat hygiene training for London authorities in association with peer organisations; allied universities and food professionals utilising Smithfield Market.</p> <p>Further develop health & safety training for peers</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>Outcome 8: We have access to the skills and talent we need.</p> <p>Outcome 9: We are digitally and physically well-connected and responsive.</p> <p>Outcome 10: We inspire enterprise, excellence, creativity and collaboration.</p> <p>Our workforce is adequately resourced and experienced, enabling the service to fulfil our key objectives.</p> <p>We have a more efficient service and improved staff morale, resulting in a better service for our customers.</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 will be well led and experienced, enabling the service to fulfil the objectives set now and for the foreseeable future.</p> <p>Two further Chartered professionals will complete a revised ILM management course and they will be given opportunities to develop further.</p> <p>Advance the development of the two Graduate trainee Environmental Health Practitioners engaged in September 2018 so they have the opportunity to complete their Professional Portfolios and Professional Practice Interviews.</p>	<p>Assistant Director (Public Protection)</p> <p>Commercial EH Team Manager</p> <p>All Team Members</p>

Action	Activities	Outcome – Corporate Plan objectives are in bold	Responsibility
<p>5. Further develop IT and information management systems and capabilities. Improve our online service offer.</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 to improve our digital customer 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.³</p>	<p>Outcome 9: We are digitally and physically well-connected and responsive.</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 will be better able to better identify poor performing businesses and sectors</p> <p>More 'open data' provision is considered.</p>	<p>Assistant Director (Public Protection)</p> <p>Commercial EH Team Manager</p> <p>Project Lead Officers</p>

3 Activities to include:-

- further corporate website development;
- online forms (inc. payments);
- sign up to the new FSA food registration system;
- data gathering and development of data analytics (inc. the FSA work on performance management and segmentation in RoF); and
- the development of the Departments management information system (database)

Appendix 1: City Food Safety Enforcement Plan 2019-20

The backbone of our regulatory work on food control remains a targeted (risk-based) intervention program developed in accordance with the requirements of the Food Law Code. The following table illustrates the food hygiene rating profile of premises in the City of London. **Corporate Outcome: 1: People are safe and feel safe. 2: People enjoy good health and wellbeing. 5: Businesses are trusted. 9: We are digitally and physically well-connected and responsive.**

Rating profile Frequency of Hygiene Inspections	Total number of premises, year				FHRS Rating		
	2015-16	2016-17	2017-18	2018-19	FHRS	(2015-16) (2016-17) (2017-18)	2018-19
A rated 6 monthly inspection	27	15	17	17	0	(15) (7) 5	2
B rated Annually	114	123	108	143	1	(60) (39) 30	29
C rated 18 monthly	493	518	484	483	2	(75) (76) 58	42
D rated Every 2 years	802	872	837	855	3	(141) (101) 96	76
E rated = Every 3 years	321	372	362	353	4	(325) (293) 271	245
Unrated / awaiting inspection	35	34	41	58	5	(1095) (1224) 1259	1290
City Total	1792	1934 ⁴	1891	1909 ⁵	Awaiting inspection	(35) (34) 41	46
				231 (ceased trading)	Exempt, excluded etc.	(87) (92) 90	99
				251 (Businesses registered)	Rated FHRS 3 or better	94.5%, (89.7) ⁶ (91.4) ⁷ (93) ⁸	95.7
					Total	1850 (1777) (1833) (1866)	1829

4 Includes premises that closed during the year

5 Includes establishments in Port Health Services area of responsibility

6 % Compliant 2015-2016

7 % Compliant 2016-2017

8 % Compliant 2018-19

1. Food Hygiene inspections

Complete the required risk-based food hygiene interventions: 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	Done 2013-14	Done 2014-15	Done 2015-16	Done 2016-17	Done 2017-18	Done 2018-2019	DUE 2019-20	Predicted commitment
A rated = Inspected 6 monthly	49	52	45	27	40	29	15	240 hours
B rated = Inspected annually	133	127	121	106	124	103	98	600 hours
C rated = Inspected 18 months	589	335	313	298	312	287	262 (2)	1352 hours
D rated = Inspected 2 yearly	128	313	462	342	347	407	414 (78)	2136 hours
E rated = Inspected ever 3 years	81	97	123	117	44	82	126 (26)	262 hours
Unrated / awaiting inspection	36	39	67	62	129	58	58	120 hours
Totals	980	963	1131	952	867	908	972⁹	4710 hours
Approved premises	(1)¹⁰	-	-	-	-		-	

⁹ We have had a number of inspection interventions overdue in the last two years. As at the end of 2018-19 we have reduced our backlog (133 premises overdue, of which 42 were due in March 2019) and we are planning to get the backlog removed entirely within this current year. A number of premises (rated Cat E) are now subject to an alternative enforcement strategy; this is currently limited to the low risk river vessels (for food hygiene and undertaken by the Port Health Service).

¹⁰ The premises at Smithfield Market are approved as cutting and associated co-located establishments. Food Hygiene requirements are enforced directly by the FSA including through their national contractor Eville & Jones, whilst the City Corporation carries out interventions in relation to Food Standards and other related matters in the market.

2. Food Standards inspections

All high-risk premises are rated in accordance with the intervention rating scheme in part 5 of the code; all others including any overdue inspections are 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	Done 2018-2019	Due 2019-20	Predicted commitment
A= Annually	1	1	0	1	0	1	-
B = Two yearly	97	78	97	73	79	172	-
C = Five yearly	175	373	240	252	290	512	-
Unrated		5	-		35	64	-
	-	-	-		-		-
Total	372	457	337	326	369	749	500 hours* ¹¹

¹¹ Estimate based upon previous years

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	2018-19¹²	2017-18	2016-17	2015-16	2014-15	Predicted commitment
	538	582	321	243	318	616 hours ¹³

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

	2018-19	2017-18	2016-17	2015-16	2014-15	Predicted commitment
Letters with legal requirements	684	698	622	614	697	Inc. in Inspection Time quoted above.
Numbers of HIN's	3	5	5	10	15	7.5 per notice
Voluntary Closures	9	4	1	5	9	10 per premises
Emergency Prohibitions	0	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	0	2 weeks per case

¹² This does not include Freedom of Information Act requests which a dealt with separately

¹³ Estimate based upon times spent on a sample (n=308) of 2018/19 requests

Action	Activities	Outcomes- Corporate Plan objectives are in bold	Responsibility
<p>5- Maintain support for the national Food Hygiene Rating Scheme (FHRS)</p> <p>We will continue to support the FHRS and the development of mandatory display.</p>	<p>It is important for consumer and business confidence that the FHRS system remains credible and objective and 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 model¹⁴.</p> <p>We will consider slight adaptations to the national inspection scheme for lower risk premises and using competent but not fully authorised officers - e.g. Environmental Health Graduates 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>Outcome 1: People are safe and feel safe.</p> <p>Outcome 5: Businesses are trusted and socially and environmentally responsible.</p> <p>Public trust in food regulation:-</p> <p>Improvements in the number of businesses that meet minimum compliance levels and, in the number, evidencing 'very good' standards of compliance. 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 EH Team Manager</p>

Appendix 1: City Food Safety Enforcement Plan 2019-20

Action	Activities	Outcomes- Corporate Plan objectives are in bold	Responsibility
<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 visits and coaching sessions.</p> <p>Use agreed national food safety managements systems such as “Safe Food, Better Business” where these are appropriate. Use on-site inspection reports and mobile working systems.</p> <p>Support the use of ethical business regulation principles.</p> <p>Formal enforcement action will be informed by our current Policy Statement on Enforcement.</p>	<p>Outcome 1: People are safe and feel safe.</p> <p>Outcome 5: Businesses are trusted and socially and environmentally responsible.</p> <p>Action against food businesses that fail to fulfill their obligations. Improving standards in riskier 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 and at the end of 2015-2016 it had fallen to 150. The number of non-compliant businesses has declined consistently over the years; at the end of 2018-19, was down to 73 out of 1829 City food businesses (4%).</p>	<p>Assistant Director (Public Protection)</p> <p>Commercial EH Team Manager</p>
<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>Exchange intelligence and findings on sampling results using relevant local and national intelligence, a key element to a robust system of Official Food Controls.</p> <p>If requested, we will acknowledge and respond to any originating local food authority, in respect of inland referrals, confirming any action taken.</p>	<p>Outcome 1: People are safe and feel safe.</p> <p>Outcome 5: Businesses are trusted and socially and environmentally responsible.</p> <p>Delivery of a risk-based sampling programme. This work was scaled back in 2018-19 but the intention is to conduct further sampling work in 2019-2020, particularly where it supports other workstreams – e.g. dealing with non-compliant businesses.</p>	<p>Commercial EH Team Manager</p> <p>Lead Sampling Officer</p>

Appendix 1: City Food Safety Enforcement Plan 2019-20

Action	Activities	Outcomes- Corporate Plan objectives are in bold	Responsibility
<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 product recalls</p>	<p>Outcome 1: People are safe and feel safe. Outcome 5: Businesses are trusted and socially and environmentally responsible.</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 EH Team Manager</p>
<p>9. Protect consumers from food fraud and as a result of food incidents / food recalls.</p>	<p>Consider the most appropriate means of disrupting and deterring criminal activity.</p> <p>Utilise the development of the intelligence Database, IDB within Environmental Health.</p>	<p>Outcome 1: People are safe and feel safe. Outcome 5: Businesses are trusted and socially and environmentally responsible.</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.</p>	<p>Assistant Director (Public Protection)</p> <p>Commercial EH Team Manager</p>
<p>10. The investigation of incidents of infectious disease and non-infectious environmental hazards.</p>	<p>Reactive investigations are conducted using our procedures and following the agreed Public Health England (PHE) protocols</p>	<p>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 12: Spaces are secure, resilient and well-maintained.</p> <p>Incidents and notification from PHE are followed up using the agreed protocols.</p>	<p>Assistant Director (Public Protection)</p> <p>Commercial EH Team Manager</p>

Appendix 2: Health & Safety Intervention Plan 2019-20

Activity	Rationale for intervention: evidence identifying concern and priority- Corporate Plan objectives are in bold	Planned activity or resource
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Proactive interventions- Local Authority (LA) Circular ([LAC 67/2 \(rev 8\)](#)) provides guidance and tools for priority planning and targeting our interventions, it is part of the supplemental guidance that helps us meet requirements of the [National Local Authority Enforcement Code](#)

<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>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 12: Spaces are secure, resilient and well-maintained.</p> <p>Still a high-risk sector in HSE National Priorities (2019-20), cooling tower sites 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, and 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>We currently have 164 cooling towers sites in the City¹⁵. Twenty-two are currently decommissioned and twenty-two are rated 'A' (high risk)</p> <p>Inspection of all our sites remains a local priority, which was previously endorsed by City of London's Port Health & Environmental Service Committee. The risk of a Legionnaires' disease outbreak affecting the Square Mile is considered an</p>	<p>Risk-based interventions due at 90 sites with cooling towers; revisits and enforcement action taken as necessary; and review status of decommissioned tower sites and follow up accordingly.</p> <p>90 sites at 5hrs per site = 450 hrs;</p> <p>Engagement with duty holders at new / proposed cooling tower sites: Advice to Principal Designers and Designers¹⁶ including at the pre-application or Planning Application stage of development.</p> <p>Estimated time: 70 hrs</p> <p>Legionella Control Association Attend quarterly meetings</p> <p>Deliver training for inspectors on legionella and cooling towers (in conjunction with ALEHM and wider).</p> <p>Host / support further professional development events for the regulatory and public health community. Help devise and deliver a Legionella and Cooling Towers Exercise in London*.</p> <p>Builds on development of the revised London Boroughs' Legionella protocol and London Health Protection Teams, operating procedures on Legionella. HSE will also</p>
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¹⁵ As at April 2019

¹⁶ Statutory responsibilities are set out in the Construction (Design and Management) Regulations 2015

<http://www.hse.gov.uk/construction/cdm/2015/commercial-clients.htm>

Appendix 2: Health & Safety Intervention Plan 2019-20

Activity	Rationale for intervention: evidence identifying concern and priority- Corporate Plan objectives are in bold	Planned activity or resource
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Proactive interventions- Local Authority (LA) Circular ([LAC 67/2 \(rev 8\)](#)) provides guidance and tools for priority planning and targeting our interventions, it is part of the supplemental guidance that helps us meet requirements of the [National Local Authority Enforcement Code](#)

	<p>when compared with any perceived burden from our intervention activity.</p> <p>Cooling towers are being installed on new developments each year; We still note issues with the design of some new installations affecting Legionella risk and work at height, also a City Corporation priority.</p> <p>We have an established intervention protocol and a Cooling Tower Inspection mobile working app developed to aid our work.</p>	<p>be involved.</p> <p>Review and refine the iAuditor Cooling Towers inspection pro forma and the use of data captured at interventions.</p> <p>Estimate time: 122.5hrs</p> <p><u>Estimated Total Time: 622.5 hrs</u></p>
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Appendix 2: Health & Safety Intervention Plan 2019-20

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Proactive interventions- Local Authority (LA) Circular ([LAC 67/2 \(rev 8\)](#)) provides guidance and tools for priority planning and targeting our interventions, it is part of the supplemental guidance that helps us meet requirements of the [National Local Authority Enforcement Code](#)

<p>3.Event Safety / Crowd control at large scale public gatherings/ events</p>	<p>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 12: Spaces are secure, resilient and well-maintained.</p> <p>Large scale events remain a National Priority for 2019-2020.</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 Police Service, the City of London Police, LFCDA, London Ambulance, City Corporation's Highways service, 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 Corporation'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.</p> <p>Follow-up action taken as necessary.</p> <p><u>Estimated Total Time = 105 hrs</u></p>
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Appendix 2: Health & Safety Intervention Plan 2019-20

Activity	Rationale for intervention: evidence identifying concern and priority- Corporate Plan objectives are in bold	Planned activity or resource
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Proactive interventions- Local Authority (LA) Circular ([LAC 67/2 \(rev 8\)](#)) provides guidance and tools for priority planning and targeting our interventions, it is part of the supplemental guidance that helps us meet requirements of the [National Local Authority Enforcement Code](#)

<p>4. Falls from Height related to external building cleaning and servicing Building on valuable work carried out in 2014-18 and in response to demand from businesses and intermediaries.</p>	<p>There are a large number of sites in the City where external Working at Height (WAH) is carried out.</p> <p>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 12: Spaces are secure, resilient and well-maintained</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: - 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> <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</p>	<p>Continue to engage with policy makers such as the All-Party Parliamentary Group (APPG) on Working at Height.</p> <p>Set up a London-based Work At Height forum; input envisaged from FMs, service providers and industry experts. Examine underlying issues throughout Work At Height supply chains. The focus would mainly be on façade access and cleaning but with overlaps in relation to contractor management. The forum will seek to influence safer Work At Height culture. The aim will be for the forum to be industry led.</p> <p>Further enhance the Work at Height web-based offering for stakeholders.</p> <p>Complete a number of further training events and briefings to interested parties (Facilities Managers, etc).</p> <p>Devise and deliver the project brief for a London-wide Commercial Estates project (see 6. Below).</p> <p><u>Estimated time= 210hrs</u></p>
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Appendix 2: Health & Safety Intervention Plan 2019-20

Activity	Rationale for intervention: evidence identifying concern and priority- Corporate Plan objectives are in bold	Planned activity or resource
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Proactive interventions- Local Authority (LA) Circular ([LAC 67/2 \(rev 8\)](#)) provides guidance and tools for priority planning and targeting our interventions, it is part of the supplemental guidance that helps us meet requirements of the [National Local Authority Enforcement Code](#)

<p>5. Leisure Expert panel</p>	<p>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 12: Spaces are secure, resilient and well-maintained Unlocking full potential- working with partners who share our aims.</p> <p>We are founder members of the Leisure Expert Panel (LEP), an Industry group bringing together stakeholders in the delivery of health & safety outcomes in the Leisure Sector.</p> <p>There is a particularly high concentration of fitness service providers across range of budgets operating within Square Mile for which we have limited intelligence regarding individual compliance but gain trend data via networking and involvement with LEP.</p> <p>In November 2018 a Gym Staffing guidance document was launched at the LEP annual conference. This was developed from a working group chaired by City of London officers to address a gap in existing guidance and that directly assists our Primary Authority partners in addition to the wider industry where decisions around the level of staffing on fitness floors in gyms are being made.</p>	<p>Represent Local Authority regulatory perspective on the LEP Executive Team (approx. 6 meetings a year in Central London and additional provision of steer / guidance to any relevant working groups formed)</p> <p>We hope to engage with wider groups, e.g. UKActive etc. this year and this might mean extra meetings</p> <p>Attend and contribute time to development of LEP conference (annual) and mini-conferences (2 a year) including active participation as necessary (attendance would be 4 days for 2 officers alone, development likely adds at least 1 more day)</p> <p>Support the LEP Training and Mentoring Programme (delivery of 2 x ½ day training sessions a year)</p> <p>Attend LEP Training Programme events (approx. 2-3 days)</p>
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Appendix 2: Health & Safety Intervention Plan 2019-20

Activity	Rationale for intervention: evidence identifying concern and priority- Corporate Plan objectives are in bold	Planned activity or resource
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Proactive interventions- Local Authority (LA) Circular ([LAC 67/2 \(rev 8\)](#)) provides guidance and tools for priority planning and targeting our interventions, it is part of the supplemental guidance that helps us meet requirements of the [National Local Authority Enforcement Code](#)

<p>6.All-London Borough Health & Safety Liaison Group (ALBHSLG); Planned project activity</p>	<p>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 12: Spaces are secure, resilient and well-maintained.</p> <p>A targeted intervention programme has been identified by an ALBHSLG tasking group with a focus on specific work activities in Commercial Estates.</p> <p>Data and intelligence were collated across all 33 London boroughs which resulted in two health and safety priority areas being identified for the project, namely asbestos (duty to manage) and work at height.</p> <p>A targeted intervention programme has been identified by an ALBHSLG tasking group with a focus on specific work activities in Commercial Estates. Data and intelligence were collated across all 33 London boroughs which resulted in two health & safety priority areas being identified for the project, namely asbestos (duty to manage) and work at height</p>	<p>Commercial Estates Project 2019-20.</p> <p>A joined-up, targeted and London-wide approach focused on duty-holders who own, operate or manage a range of properties or property portfolios for profit.</p> <p>The aims are:</p> <ul style="list-style-type: none"> • devise the project brief; • develop a project toolkit and accompanying training/ materials for regulators to utilise; • influence supply chains through engagement with larger organisations and assessment of their health & safety management systems; • devise a protocol for intelligence concerning cross-LA duty-holder compliance (using the HELEX online portal); • identify and intervene as necessary with poor performers on the identified priority health & safety outcomes and using a range of enforcement options; and • promote sustainable compliance in duty-holders.
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Appendix 2: Health & Safety Intervention Plan 2019-20

Activity	Rationale for intervention: evidence identifying concern and priority- Corporate Plan objectives are in bold	Planned activity or resource
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Proactive interventions- Local Authority (LA) Circular ([LAC 67/2 \(rev 8\)](#)) provides guidance and tools for priority planning and targeting our interventions, it is part of the supplemental guidance that helps us meet requirements of the [National Local Authority Enforcement Code](#)

<p>7. Commercial catering premises using solid fuel cooking equipment</p>	<p>Outcome 1: People are safe and feel safe.</p> <p>Carbon monoxide poisoning from lack of suitable ventilation and/or unsafe solid fuel cooking appliances in commercial premises remains an HSE National Priority.</p> <p>Project work in London in 2017-18 suggested material breach rates were high.</p>	<p>Continue to survey food premises likely to be using solid fuel appliances (at the time they become due for a food hygiene inspection).</p> <p>Follow-up enforcement in premises where there are matters of evident concern:</p> <p><u>Estimated Total = 105hrs</u></p>
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Appendix 2: Health & Safety Intervention Plan 2019-20

Activity	Rationale for intervention: evidence identifying concern and priority	Planned activity or resource
Reactive interventions		
<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>Outcome 1: People are safe and feel safe.</p> <p>Outcome 2: People enjoy good health and wellbeing.</p> <p>Outcome 5: Businesses are trusted and socially and environmentally responsible.</p> <p>Outcome 12: Spaces are secure, resilient and well-maintained.</p> <p>Incidents / Accidents: decision to investigate in accordance with the Incident Selection Criteria Guidance LAC 22/13¹⁷</p> <p>Evidence obtained during the investigation that health & 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 the HSE's Enforcement Management Model (EMM)</p> <p>Accidents, Incidents, Notifications Estimated = 105 hrs</p> <p>All complaints, service requests and Notifications estimate = 70 hrs</p> <p>MST interventions: Estimated time = 55 hrs</p> <p><u>Estimated Total Time= 230hrs</u></p>

Appendix 3: Background Information & Key Facts about the Team

Human Resources	1 x Assistant Director (0.25 FTE) 1x Commercial Team Manager (1.0 FTE) 8 x EHO posts (7.8 FTE) 1 x Senior Authorised Officer (Smithfield Market) (1.0 FTE) 1x Graduate EHO Trainee post
Financial Resources	2018-19: £808,309.78 2019-20: £859.000
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 on-call for all alerts, emergencies or incidents.</p> <p>All calls 24/7 to: 020 7606 3030</p>
Location	Port Health & Public Protection Service Walbrook Wharf 78-83 Upper Thames Street London EC4 R 3TD (Nearest Tube: Cannon Street)

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 acting as London's Port Health Authority. The City's daytime working population is now approaching 500,000 (483,00) with people working in many different business sectors but largely concentrated in financial and professional services sector. 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.

Many 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

Appendix 3: Background Information & Key Facts about the Team

are expanding in the City and 2018 saw the opening of further retail spaces in and around the Bloomberg site and around Leadenhall Market.

The City remains home to Smithfield Market, 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 and Food Standards

The Commercial Environmental Health Team inspect premises for food safety according to the FSA'S Food Law Code of Practice¹⁸. Inspections are based on risk and inspection frequencies calculated using the Code and follow-up interventions which are determined on the extent of an establishment's legal compliance. Officers carrying out these Food Hygiene inspections will also consider the appropriate application of the FSA's current *E. coli* guidance as part of their overall assessment of compliance.

We adopted the national Food Hygiene Rating Scheme (FHRS) just before London 2012, and we continue to promote the scheme, 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 visits; this is based on work done with poor performing businesses in the City in the last few years which showed there was some success in maintaining or improving compliance through face to face regular contact.

Follow-up interventions now also a requirement of the Food Law 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. These are a very important part of the service, especially in poor performing businesses, as they help ensure that standards are maintained and improved where required.

¹⁸ [Food Law Code of Practice](#) remains the one updated March 2017 further revisions were proposed in 2018 as part of Regulating our Future but have yet to be implemented.

Appendix 3: Background Information & Key Facts about the Team

Each new food business receives a Food Hygiene and Food Standards intervention to assess their compliance with the relevant legislation. We endeavour to do so within 28 days of their opening, and at which point the business is risk-rated to trigger future inspections, to determine any further appropriate intervention and in most cases to give them a public food hygiene rating. 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 Health & Safety Enforcing Authority in most workplaces within the City of London. Whilst many employees in the City will not face significant 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.

We want the City to be more than just a safe place. We would like to positively influence the health of everyone who lives and works in the City, enabling them to live healthily, preventing ill health developing, and promoting strong and empowered groups of individuals who are motivated to drive positive change within their communities and businesses. Work in this area is co-ordinated by the City of London Health and Wellbeing Board.

We deliver our service through a mixture of proactive, evidence-based interventions steered by national and local priorities. Our interventions are focussed on where we might best influence decision making on risks. So, although we carry out risk based formal proactive inspections of the 164 cooling tower sites, much of our work 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 mental health.

The health & safety enforcement intervention work carried out is recognised nationally, and internationally, for our work associated with cooling towers and work at height on tall buildings. We often provide advice and training to other UK local enforcement authorities as well as businesses with a national and international profile.

Advice to Businesses and the Primary Authority Scheme

Advice to businesses is an integral part of the service we provide and forms a significant part of the discussions with businesses including at the design stage for new or refurbishments premises when they may come to our attention through the City's Planning, Building Control and Licensing functions. We are encouraging businesses to use web-based resources to help answer initial enquiries. We use a variety of media to engage with business including Twitter and You Tube to disseminate advice and guidance and to better understand businesses and customers' needs.

The team have Primary Authority Partnerships for food safety and/or health & safety work with several national organisations in the property management, health & fitness, retail, pet retail and contract catering sectors and further information on all of these 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 its neighbours in the SE London Food Group and through the pan-London Food Co-ordinating Group who also takes advice and guidance from Public Health England and Public Analysts so as to develop a sampling plan that considers the co-ordinated programs as well as 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 various regulatory networks for both food safety and health & safety, linking with government agencies at regional and national level (Food Standards Agency, Health & Safety Executive, Public Health England, etc.).

We represent the City at local and national forums and networks where these increase our influence on and understanding of the communities we regulate and also work with industry partners and stakeholders in such groups and the London Banks' Health & Safety Forum, the Legionella Control Association and the Leisure Industry Panel.

Staff Development Plan

Staff development is managed through the City Corporation's Performance & Development Framework (P&DF) appraisal scheme; there is a new scheme for 2019-20. Specific assessments are also used such as the Regulator's Development Needs Analysis tool. The Continuing Professional Development requirements for Environmental Health Officers as members of the Chartered Institute of Environmental Health and Institute of Occupational Safety & Health etc. are taken also into account¹⁹. as many of our officers are Chartered members of one or both of these institutes.

Quality Assessment and Internal Monitoring

Monitoring is by way of the City Corporation's annual P&DF appraisal scheme which 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 regular 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 food businesses [168 hours pa].

There are also regular bi-weekly team briefings and meetings [234 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, 30 hours pa H&S].

¹⁹ 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.