



Port Health & Environmental Services Committee

Date: TUESDAY, 19 JULY 2016
Time: 11.30 am
Venue: COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

Members:

Wendy Mead (Chairman)	Professor John Lumley
Jeremy Simons (Deputy Chairman)	Alderman Julian Malins
Deputy John Absalom	Andrew McMurtrie
Keith Bottomley	Brian Mooney
Dennis Cotgrove	Hugh Morris
Karina Dostalova	Barbara Newman
Peter Dunphy	Ann Pembroke
Deputy Kevin Everett	Henrika Priest
Anne Fairweather	Deputy Richard Regan
Deputy Bill Fraser	Delis Regis
George Gillon	John Scott
Deputy Stanley Ginsburg	Deputy James Thomson
Graeme Harrower	Deputy John Tomlinson
Alderman Peter Hewitt	Michael Welbank (Chief Commoner)
Wendy Hyde	Mark Wheatley
Vivienne Littlechild	Philip Woodhouse

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Lunch will be served in Guildhall Club at 1PM
NB: Part of this meeting could be the subject of audio or video recording

John Barradell
Town Clerk and Chief Executive

AGENDA

Part 1 - Public Agenda

1. **APOLOGIES**
2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**
3. **MINUTES**
To agree the public minutes and summary of the meeting held on 23 May 2016.
For Decision
(Pages 1 - 8)
4. **WARDMOTE RESOLUTIONS**
To receive a resolution from the Grand Wardmote of the Ward of Bishopsgate and a resolution from the Grand Wardmote of the Ward of Broad Street.
For Information
(Pages 9 - 10)
5. **OUTSTANDING ACTIONS**
To note the list of Outstanding Actions.
For Information
(Pages 11 - 14)
6. **HOUSING AND PLANNING ACT**
Report of the Remembrancer.
For Information
(Pages 15 - 16)
7. **REVENUE OUTTURN 2015/16**
Joint report of the Chamberlain, Director of the Built Environment, Director of Markets and Consumer Protection, and Director of Open Spaces.
For Information
(Pages 17 - 26)
8. **RESPONSIBLE PROCUREMENT STRATEGY 2016-19**
Report of the Chamberlain.
For Information
(Pages 27 - 58)
9. **REPORT TO AUDIT AND RISK MANAGEMENT COMMITTEE ON AIR QUALITY**
Report of the Director of Markets and Consumer Protection.
For Information
(Pages 59 - 62)
10. **DRAFT CITY OF LONDON NOISE STRATEGY 2016-26**
Report of the Director of Markets and Consumer Protection.
For Decision
(Pages 63 - 66)

11. **PORT HEATH OFFICES - LAND & PREMISES, RIVERSIDE ROAD, CHARLTON, LONDON, SE7 7SU - RENEWAL OF LEASE**
Report of the Director of Markets and Consumer Protection.
For Decision
(Pages 67 - 68)
12. **FOOD STANDARDS AGENCY AUDIT 2015**
Report of the Director of Markets and Consumer Protection.
For Information
(Pages 69 - 96)
13. **CITY OF LONDON CEMETERY AND CREMATORIUM RISK MANAGEMENT**
Report of the Director of Open Spaces.
For Decision
(Pages 97 - 110)
14. **DEPARTMENT OF THE BUILT ENVIRONMENT BUSINESS PLAN 2015-18 PERIOD 3 PROGRESS**
Report of the Director of the Built Environment.
For Information
(Pages 111 - 118)
15. **BODY WORN VIDEO TRIAL UPDATE**
Report of the Director of the Built Environment.
For Decision
(Pages 119 - 122)
16. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
17. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
18. **EXCLUSION OF THE PUBLIC**
MOTION – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of the Schedule 12A of the Local Government Act.

Part 2 - Non-public Agenda

19. **NON-PUBLIC MINUTES**
To agree the non-public minutes of the meeting held on 23 May 2016.
For Decision
(Pages 123 - 124)
20. **MARKETS AND CONSUMER PROTECTION DEPARTMENT SERVICE BASED REVIEW UPDATE**
Report of the Director of Markets and Consumer Protection.
For Information
(Pages 125 - 128)

21. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
22. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERED URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

PORT HEALTH & ENVIRONMENTAL SERVICES COMMITTEE

Monday, 23 May 2016

**Minutes of the meeting of the Port Health & Environmental Services Committee
held at the Guildhall EC2 at 2.00 pm**

Present

Members:

Deputy John Absalom
Keith Bottomley
Peter Dunphy
Deputy Bill Fraser
George Gillon
Deputy Stanley Ginsburg
Alderman Peter Hewitt
Wendy Hyde
Vivienne Littlechild
Professor John Lumley
Alderman Julian Malins

Wendy Mead
Barbara Newman
Ann Pembroke
John Scott
Jeremy Simons
Deputy James Thomson
Deputy John Tomlinson
Michael Welbank (Chief Commoner)
Mark Wheatley
Philip Woodhouse

Officers:

David Arnold	- Town Clerk's Department
John Park	- Town Clerk's Department
Jenny Pitcairn	- Chamberlain's Department
Paul Chadha	- Comptroller & City Solicitor's Department
Jim Graham	- Department of the Built Environment
David Smith	- Director of Markets & Consumer Protection
Jon Averbs	- Department of Markets & Consumer Protection
Sue Ireland	- Director of Open Spaces
Gary Burks	- Superintendent, City of London Cemetery & Crematorium
Gerry Kiefer	- Open Spaces Department
Michael Bradley	- City Surveyor's Department

1. APOLOGIES

Apologies for absence were received from Karina Dostalova, Dennis Cotgrove, Graeme Harrower, Andrew McMurtrie, Hugh Morris, and Henrika Priest.

2. MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA

Deputy Stanley Ginsburg declared a non-pecuniary interest in matters relating to commercial waste collection in Bishopsgate as a business owner on Middlesex Street.

3. **ORDER OF THE COURT OF COMMON COUNCIL**
RESOLVED – That the Order of the Court of Common Council, 21 April 2016, appointing the Committee and its Terms of Reference, be noted.
4. **ELECTION OF CHAIRMAN**
RESOLVED – That in accordance with Standing Order No. 29, Wendy Mead be elected Chairman for the ensuing year.

The Chairman welcomed Dennis Cotgrove and John Scott back the Committee and welcomed Anne Fairweather as a new Committee Member. She added her thanks to the outgoing Members: Deputy John Bennett, Henry Colthurst and Marianne Fredericks, for their contributions to the Committee.
5. **ELECTION OF DEPUTY CHAIRMAN**
RESOLVED – That in accordance with Standing Order No. 30, Jeremy Simons be elected Deputy Chairman for the ensuing year.
6. **MINUTES**
RESOLVED – That the public minutes of the meeting held on 8 March 2016 be approved.

Matters Arising

Heathrow Animal Reception Centre (HARC)

The Director of Port Health and Public Protection advised that the HARC hosted a meeting with the United States Department of Agriculture (USDA) to discuss issues being experienced surrounding both The Pet Travel Scheme and the standards of US veterinary paperwork and Emotional Support Animals. Five members of the USDA based at the US Embassy in London attended. Discussions on these matters proved fruitful and good contacts were made. Since the meeting the HARC had seen an improvement in veterinary paperwork and were made aware that the issue of Emotional Support Animals is being discussed in Washington with US carriers and the US Department of Transport.

Recycling Action Plan

The Assistant Director of Cleansing Operations advised that waste collectors had been instructed to lock waste storage bins within the Middlesex Street Estate and this instruction would be re-iterated. The Assistant Director added that the new Bishopsgate Bin units had been delivered and were soon to be installed to encourage the recycling of newspapers and magazines in and around Train Stations.

Rough Sleepers

The Chairman advised that the various contact methods and details for reporting locations of rough sleepers to relevant Officers had been circulated to Members following the last Committee meeting. Members noted that there remained a number of rough sleepers within the City of London who were offered accommodation through Broadway, a homeless charity who worked in collaboration with the City of London Police to target a reduction in people

sleeping rough in the community. Members of this Committee who were also Members of the Police Committee could raise Members' concerns at a future Police Committee meeting.

Noise Pollution

The Director of Port Health and Public Protection advised that the Chairman of Planning and Transportation Committee and a Planning and Transportation Committee Member had recently met with Transport for London to discuss noise and other matters regarding the London transport network. A briefing regarding the outcome of this meeting would be circulated to Members after the Committee meeting. The Chairman added that she would look into the matter further in consultation with the Director and the Chairman of the Planning and Transportation Committee.

7. OUTSTANDING ACTIONS

The Committee received the list of current Outstanding Actions. Members noted that the report from the West London Riverside Waste Authority regarding the piloted recycling-incentive scheme was still being produced so would be reported to the Committee when available.

RESOLVED – That the list of current Outstanding Actions be noted.

8. OPEN SPACES BUSINESS PLAN 2015-18 YEAR END PROGRESS REPORT

The Committee received a report of the Director of Open Spaces that provided a year-end update regarding progress against the sections of the Open Spaces Business Plan 2015-18 that related to the City of London Cemetery and Crematorium. Members noted that the Cemetery and Crematorium had 'overachieved' during 2015/16, having achieved more income than anticipated and budgets underspend.

RESOLVED – That the Open Spaces Business Plan 2015-18 year-end progress be noted.

9. NEW OPEN SPACES BUSINESS PLAN 2016-19

The Committee considered a report of the Director of Open Spaces that outlined the Open Spaces Business Plan 2016-19, with a particular focus on the elements within the Plan that related to the Cemetery and Crematorium. The Business Manager added that risk management had been reported in January 2016 and would be reported again at the next Committee meeting.

In response to a Member's questions, the Superintendent of the Cemetery and Crematorium agreed that an objective relating to the long-term percentage of market share cremations and burials would be considered in future Plans. The Superintendent added that income could still be generated from burials despite numbers decreasing as competitive prices could be charged for a large variety of burial options.

In response to some Members' suggestions regarding the installation of new fully abated cremators being brought forward from 2020/21, the Superintendent

advised that the some local crematoriums used solely non-abated cremators so the City of London Cemetery and Crematorium was ahead of its competitors in this respect. He added research had shown that the mercury from the current non-abated cremators was released high into the atmosphere and then precipitated over the North Sea, so it was not a threat locally.

In response to another Member's question, the Superintendent advised that the installation of photovoltaic panels on the flat roof of the Crematorium had produced 30,000kw of electricity during 2015/16. He added that the panels could not produce enough electricity to run the Crematorium site as 260,000kw were used during 2015/16.

RESOLVED – That:-

- a) the overall Open Spaces 2016 – 2019 Business Plan be noted
- b) the key actions and performance indicators relating specifically to the Cemetery and Crematorium be approved.

10. NEW DEPARTMENT OF THE BUILT ENVIRONMENT BUSINESS PLAN 2016-19

The Committee considered a report of the Director of the Built Environment that sought approval to the sections of the Department of the Built Environment Business Plan 2016-19 that related to Environmental Services.

RESOLVED – That the Department of the Built Environment Business Plan 2016-19 be approved.

11. DEPARTMENT OF THE BUILT ENVIRONMENT RISK MANAGEMENT

The Committee received a report of the Director of the Built Environment that provided details of the risk management procedures in place within the Department of the Built Environment in accordance with the corporate Risk Management Framework.

RESOLVED - That the actions taken in the Department of the Built Environment to monitor and manage effectively risks arising from the Department's operations be noted.

12. NI195 SURVEY RESULTS 2015-16

The Committee received a report of the Director of the Built Environment that provided details of the NI195 survey results conducted by Keep Britain Tidy (KBT) for the City Corporation Cleansing Service from June 2015 to March 2016. The Committee congratulated the Department for the survey results, which were the best since 2006. The Assistant Director of Cleansing Operations added that the Cleansing Service still faced the challenge to reduce the amount of chewing gum and smoking related litter within the City of London.

In response to a Member's question regarding fly posting, the Assistant Director advised that KBT would be asked to pay particular attention to this during their next survey. The Assistant Director added that the London Borough of Camden had recently prosecuted a music events promoter for fly posting; he would liaise

with the Comptroller and City Solicitor's Department to discuss the possibility of prosecutions within the City of London.

In response to a Member's question regarding the Holborn viaduct staircase, the Assistant Director advised they had recently been cleaned following a site meeting. It had previously been cleaned twice a year but this would be increased to four times per year in addition to daily inspections by sweepers. The Member requested that the cleans be increased beyond four times per year so the Assistant Director agreed to discuss this matter at the next site meeting and report back to the Member.

RESOLVED – That the NI195 Survey results be noted.

13. PORT HEALTH AND PUBLIC PROTECTION BUSINESS PLAN 2015-18 PERIOD 4 PROGRESS REPORT

The Committee considered a report of the Director of Markets and Consumer Protection that provided an update regarding the progress against the key performance indicators and objectives outlined in the Port Health and Public Protection Business Plan 2015-18 for Period three of 2015/16.

RESOLVED – That the report be noted.

14. PORT HEALTH AND PUBLIC PROTECTION BUSINESS PLAN 2016-19

The Committee considered a report of the Director of Markets and Consumer Protection that sought approval to the 2016-19 Business Plan of the Port Health and Public Protection Service.

RESOLVED – That the Port Health and Public Protection Business Plan 2016-19 be approved.

15. MASSAGE & SPECIAL TREATMENT FEES 2016/17

The Committee considered a report of the Director of Markets and Consumer Protection that sought approval to the 2016/17 Massage and Special Treatment Licence fees and the fees for those premises seeking to register for acupuncture, tattooing, ear and cosmetic piercing or electrolysis.

In response to a Member's question, the Director of Port Health and Public Protection advised that some fees had reduced in comparison to 2015/16 because the fees could only be set on a full cost recovery basis in accordance with the Licensing Act.

RESOLVED – That the proposed fees for 2016/17 be approved.

16. HEALTH & SAFETY INTERVENTION PLAN 2016- 2017

The Committee considered a report of the Director of Markets and Consumer Protection that sought approval to the City of London Corporation's Health and Safety Intervention Plan 2016/17.

RESOLVED – That the Health and Safety Intervention Plan 2016/17 be approved.

17. LPHA FOOD SERVICE INTERVENTION PLAN 2016/17

The Committee considered a report of the Director of Markets and Consumer Protection that sought approval to the City of London and the London Port Health Authority Food Service Enforcement Plans 2016/17.

In response to a Member's question, the Director of Port Health and Public Protection advised that food market stalls are regularly checked and should always be registered with the Local Authority where they were based.

RESOLVED – That:-

- a) the City of London Food Service Enforcement Plan 2016-2017 be approved; and
- b) the London Port Health Authority Food Service Enforcement Plan 2016-2017 be approved.

18. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE

There were none.

19. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

There was none.

20. EXCLUSION OF THE PUBLIC

RESOLVED – That under Section 100A(4) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part 1 of Schedule 12A of the Local Government Act.

21. NON-PUBLIC MINUTES

RESOLVED – That the non-public minutes of the meeting held on 8 March 2016 be approved.

22. LONDON GATEWAY - ADDITIONAL OFFICE ACCOMMODATION FOR PORT HEALTH OFFICES AT MANORWAY HOUSE

The Committee considered a report of the Director of Markets and Consumer Protection that sought approval to a new lease of additional office accommodation for Port Health Offices at Manorway House.

23. DEBT ARREARS - PORT HEALTH & ENVIRONMENTAL SERVICES PERIOD ENDING 31 MARCH 2016

The Committee received a joint report of the Director of the Built Environment, Director of Markets and Consumer Protection and Director of Open Spaces regarding the arrears of invoiced income outstanding as at 31 March 2016.

RESOLVED – That the report be noted.

24. NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE

There were none.

25. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERED URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED

The Chairman reminded Members of the following upcoming Committee events: the Annual River Inspection on Friday 8 July 2016 and the bi-annual visit to the City of London Cemetery and Crematorium on Tuesday 13 September 2016.

The meeting closed at 3.05 pm

Chairman

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GRAND COURT OF WARDMOTE – Tuesday, 17th May 2016

RESOLUTIONS ARISING FROM ANNUAL WARDMOTES 2016

Ward of Bishopsgate – 17th March 2016

“That the Grand Court of Common Council do consider the provision of further facilities for the charging of electric cars within the City of London in general and in particular within the Ward of Bishopsgate.”

[Streets & Walkways Sub-Committee and Port Health & Environmental Services Committee]

Ward of Broad Street – 18th April 2016

“That, at the last Wardmote very great concern was expressed regarding the level of litter and blocking of pavements from smokers and ‘vapers’. The litter and blocking of pavements from groups of smokers causes much disturbance to local occupiers, especially those in the area local to New Broad Street.

The City of London Corporation is therefore asked to confirm:

1. What action will be taken to ensure that litter (especially from smokers) will not accumulate on pavements?
2. What action will be taken to raise the awareness of smokers to the prohibition on littering the streets and to discourage them from blocking pavements when smoking?
3. That the City of London Police will be encouraged to use its powers under environmental legislation to issue Fixed Penalty Notices to litterers.

[Streets & Walkways Sub-Committee and Port Health & Environmental Services Committee]

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Port Health & Environmental Services Committee – Outstanding Actions

Item	Date	Action	Officer responsible	To be completed/ progressed to next stage	Progress Update
1.	7 July 2015	Mobile Shredding Vehicles	Director of Transportation and Public Realm	Ongoing	<p>As reported previously, the City of London takes the environmental impact of shredding companies on residents and other City users very seriously and is committed to helping companies to reduce their pollution and noise levels within the Square Mile.</p> <p>Over the last 6 months, City Officers have met regularly with Shred-It, the main operator within the City, to look at the issues and potential solutions. I am pleased to advise you that these discussions have generally gone very well and we have established a set of joint aims. The key issue we agree on is that their clients should be encouraged to move from an on-site to an off-site shredding model. This would deliver a cost saving to their clients without any degradation to security/data protection. We are looking to supplement this with a case study/analysis exercise around sustainability/Corporate responsibility showing the environmental benefits of off-site vs. on-site shredding. This will help Shred-It to provide solid marketing to clients and we have already approached a couple of City of London Members who have agreed to get involved at this point, look at the data/marketing and provide their input. We can also use the outcomes of the exercise to encourage other operators to adopt best practice.</p> <p><u>Information from meetings:-</u> Shred-It's two year target is to reduce the % of on-site</p>

Item	Date	Action	Officer responsible	To be completed/ progressed to next stage	Progress Update
					<p>shredding clients from 55% to 30%. This target applies to all of their workers from senior management down to account managers and sales staff. Their 18 month target for London was to reduce from 55% to 45% and, as they have already met this, they have moved the target to 41%.</p> <p>They have looked at their routing schedules in South West England and reduced the number of vehicles from 65 to 54. They are going through a similar exercise for London. There has been a delay in looking at vehicle movements and emissions as Shred-It has recently been acquired by another company and part of that process is to change the tracking and other software in their fleet. So, what next?</p> <ul style="list-style-type: none"> • By end of July 2016, we will have looked at all their on-site, on-street shredding locations in the City and come up with a plan for each site. • By end of July 2016, Shred-It will have definitive data which they will share with us about CO2 emissions and the difference between on-site and off-site shredding. • By end of September 2016, Shred-It will have a comprehensive marketing sheet for customers setting out the benefits of off-site shredding. <p>Shred-It will be met with again in July and Members will be updated on progress of the above timetable.</p> <p>July Update The meeting in July referred to in the paragraph above is</p>

Item	Date	Action	Officer responsible	To be completed/ progressed to next stage	Progress Update
					scheduled for the 21 July 2016 so has not yet been held, an update will therefore be provided to your next Committee.
2.	8 March 2016	Recycling Action Plan	Assistant Director of Cleansing Operations	July 2016	<p>The Western Riverside Waste Authority (WRWA) carried out two types of monitoring before and after the Golden Ticket Scheme measuring recycling rates and contamination rates. They showed that the Golden Ticket Recycling draw had no effect on increasing the amount of recycling tonnages collected over the length of the campaign when compared to the same period in 2014/15. It also highlighted similar results with the overall contamination rates across all collection rounds and in some areas actually showed an increase in contamination rates.</p> <p>WRWA and the boroughs have, however decided to continue with the Golden ticket scheme, they are changing the focus of the scheme from incentives to rewarding residents as recycle. Additionally some of the boroughs believe that the scheme has assisted in sustaining recycling rates. Although there is no clear evidence to support this.</p> <p>The money used to fund this scheme is part of the on-going WRWA budget which is allocated to recycling communications on an annual basis.</p>

Item	Date	Action	Officer responsible	To be completed/ progressed to next stage	Progress Update
3.	8 March 2016	Bishopsgate Bin Trial	Assistant Director of Cleansing Operations	July 2016	<p>New Bin units have been delivered and are soon to be installed. Once installed, Train Station Managers will be contacted regarding the disposal of free daily newspapers and publicising the use of the bins.</p> <p>July Update 2 x BB recycling street litter bins have been installed, (St Pauls tube Station and Royal exchange), six further sites are being identified once consultation with internal colleagues has been undertaken. Local businesses and station managers are and will continue to be consulted as we roll out the new “on street” recycling units.</p>
4.	23 May 2016	Noise Pollution from the London Underground	Director of Port Health and Public Protection	Ongoing	<p>A briefing detailing the outcome of a meeting with officers from Transport for London (TfL) during May 2016 was circulated following the previous the Committee meeting.</p> <p>July Update The Chairmen of the Port Health & Environmental Services and the Planning & Transportation Committees have written to TfL to request that the issue of noise in the City of London from the London Underground be looked into as a priority.</p> <p>A further meeting between officers and Tfl is scheduled for 21 July 2016. A meeting has also been arranged between London Underground, officers and the Barbican Association in September.</p>

Committee:	Date:
Port Health and Environmental Services	19 July 2016
Subject: Housing and Planning Act	Public
Report of: Remembrancer	For Information
Report author: Sam Cook, Assistant Parliamentary Affairs Counsel	

Summary

This report advises the Committee of new regulatory functions conferred by the Housing and Planning Act 2016 with respect to landlords, letting agents and property managers in the private sector. The functions will be exercised by the Director of Markets and Consumer Protection on behalf of the Common Council in its capacity as a local housing authority. There is not expected to be major demand for their exercise in the City.

Recommendation

Members are invited to receive this report and to note the new consumer protection functions falling within the remit of the Committee.

Main Report

1. The Housing and Planning Act, which was enacted in May, contains important measures intended to set the direction of the Government's housing policy and enable it to meet its house-building targets. Most of the provisions in the Act fall within the purview of other committees and have been reported accordingly. The part of the Act within the remit of this Committee confers provisions intended to protect consumers against the behaviour of so-called 'rogue' landlords, letting agents and property managers in the private sector.
2. The main tool is the 'banning order', which may be made by the Property Chamber of the First-tier Tribunal on the application of a local housing authority (including the Common Council acting in that capacity). A banning order will prohibit landlords, letting agents or property managers from letting or managing properties for a fixed length of time. Breach of a banning order will be a criminal offence, or alternatively may attract a financial penalty of up to £30,000 imposed by the local housing authority. A banning order may only be obtained against persons convicted of a 'banning order offence'. A list of

such offences will be set out in regulations at a later date, but they are expected to relate to the provision of unsafe or substandard accommodation, or other mistreatment of tenants.

3. A database will be established of persons who are subject to banning orders. It will be maintained by the Government but local housing authorities will be responsible for supplying and updating the information. A local housing authority may also opt to include on the database a person convicted of a banning order offence, even if no banning order has been made. Such a decision will be subject to a right of appeal to the Tribunal.
4. A further tool is the 'rent repayment order'. This may be made by the Tribunal on the application of a local housing authority or tenant against a landlord convicted of certain offences such as unlawful eviction, failure to comply with an improvement notice, or management of an unlicensed house. The order may require the landlord to repay to the affected tenant (or, where rent has been met through universal credit, the local housing authority) up to twelve months' worth of rent. A local housing authority will be obliged to consider applying for a rent repayment order if it becomes aware that a landlord has been convicted of a relevant offence in relation to its area, and will have the power to assist a tenant who wishes to apply for such an order.
5. Owing to the small size and the nature of the privately rented housing sector within the City, it is not thought that there will be much call for the exercise of the new functions, and any additional enforcement burden on the Corporation should accordingly be limited. The Director of Markets and Consumer Protection has nevertheless been advised of the need to have in place the capacity to exercise the powers should appropriate cases arise. The relevant provisions are not expected to be brought into force until next year, after further consultation has taken place on implementation.

Sam Cook

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Remembrancer's Office

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Committee	Dated:
Port Health and Environmental Services	19 July 2016
Subject: Revenue Outturn 2015/16	Public
Report of: Chamberlain Director of the Built Environment Director of Markets and Consumer Protection Director of Open Spaces	For Information
Report author: Jenny Pitcairn, Chamberlain's Department	

Summary

This report compares the revenue outturn for the services overseen by your Committee in 2015/16 with the final budget for the year. Overall total net expenditure for the year was £13.499m, whereas the total agreed budget was £14.726m, representing an underspend of (£1.227m) as set out below:

Summary Comparison of 2015/16 Revenue Outturn with Final Budget			
	Final Budget	Revenue Outturn	Variation Increase/ (Reduction)
	£000	£000	£000
Direct Net Expenditure			
Director of the Built Environment	6,884	6,858	(26)
Director of Markets and Consumer Protection	2,725	2,322	(403)
Director of Open Spaces	(1,617)	(2,006)	(389)
City Surveyor	1,032	849	(183)
Total Direct Net Expenditure	9,024	8,023	(1,001)
Capital and Support Services	5,702	5,476	(226)
Overall Total	14,726	13,499	(1,227)

Chief Officers have submitted requests to carry forward underspendings, and these will be considered by the Chamberlain in consultation with the Chairman and Deputy Chairman of the Resource Allocation Sub Committee.

Recommendation(s)

Members are asked to:

- Note the report and the proposed carry forward of underspendings to 2016/17.

Main Report

Revenue Outturn for 2015/16

1. Actual net expenditure for your Committee's services during 2015/16 totalled £13.499m, an underspend of (£1.227m) compared to the final budget of £14.726m. A summary comparison with the final budget for the year is tabulated below. In this and subsequent tables, figures in brackets indicate income or in-hand balances, increases in income or decreases in expenditure.

Summary Comparison of 2015/16 Revenue Outturn with Final Budget				
	Final Budget	Revenue Outturn	Variation Increase/ (Reduction)	Variation Increase/ (Reduction)
	£000	£000	£000	%
Local Risk				
Director of the Built Environment	6,856	6,830	(26)	(0)
Director of Markets and Consumer Protection	2,659	2,264	(395)	(15)
Director of Open Spaces	(1,617)	(2,006)	(389)	(24)
City Surveyor	1,032	849	(183)	(18)
Total Local Risk	8,930	7,937	(993)	(11)
Central Risk				
Director of the Built Environment	28	28	0	0
Director of Markets and Consumer Protection	66	58	(8)	(12)
Total Central Risk	94	86	(8)	(9)
Capital and Support Services	5,702	5,476	(226)	(4)
Overall Total	14,726	13,499	(1,227)	(8)

2. The main local risk variations comprise:

- **Director of Markets and Consumer Protection (£395,000 underspend)**
 - an increase in income at the Heathrow Animal Reception Centre from fish imports and the Passports for Pets Scheme (£334,000)
 - additional grants income of (£68,000) from the Food Standards Agency for feed sampling at the Ports
- **Director of Open Spaces (£389,000 underspend)**
 - an increase in income from cremations, burials, sales of graves, and memorial dedications (£346,000)

– a reduction in employee costs due to planned holding of vacancies (£52,000)

- **City Surveyor (£183,000 underspend)**

- underspends due to slippage in the Additional Works Programme of premises repairs and maintenance (£201,000)

3. The (£226,000) underspend in capital and support services is the result of changes in the level and attribution of central costs.
4. Appendix 1 provides a more detailed comparison of the local risk outturn against the final budget, including explanation of significant variations. Appendix 2 shows the gross local risk expenditure and income against budget for each services.
5. Appendix 3 shows the movement from the 2015/16 original budget and the latest approved budget (as reported to your Committee in November 2015) to the final budget.

Local Risk Carry Forward to 2016/17

6. The Director of the Built Environment has a local risk underspending of (£26,000) on the activities overseen by your Committee. The Director also had local risk underspending totalling (£386,000) on activities overseen by other Committees. The Director is proposing that £336,000 of her total eligible underspend of £360,000 be carried forward, of which £85,000 relates to activities overseen by your Committee for the following purposes:
 - A contribution towards the corporate 'accommodation and ways of working' project – £10,000
 - Complete the planned upgrade of the Automatic Public Convenience at Aldermanbury, which was delayed due to unforeseen ground works and utilities issues – £35,000
 - Replacement of a very old Ford Transit Tipper with an Ultra-Low Emission Zone compliant vehicle, £40,000.
7. The Director of Markets and Consumer Protection has a local risk underspending of (£395,000) on the activities overseen by your Committee. The Director also had local risk underspending totalling (£561,000) on activities overseen by other Committees. The Director is proposing that £366,000 of his eligible underspend of £390,000 be carried forward, of which £215,000 relates to activities overseen by your Committee for the following purposes:
 - To furnish and equip the new office area at Manorway House upon completion of the lease – £15,000
 - To purchase and configure mobile devices and software as part of the PH&PP Mobile Working project to provide officers with 'real time' access to our back office systems whilst out in the field – £25,000
 - The Port Health Service works closely with the Thames Estuary Partnership (TEP) and a Member is a Director. A one off donation has been requested due to Environment Agency funding being withdrawn – £15,000

- To employ a fixed term contract Trading Standards Officer for 2016/2017 to develop the Operation Broadway model across Greater London. Operation Broadway is a joint Trading Standards and City Police 'scam busting' (anti-fraud) operation that is expanding to encompass a wider area of London under City leadership – £50,000
 - To employ six apprentices and/or City Business Trainees – £82,000
 - Purchase of noise and vibration monitoring equipment – £13,000
 - To employ a temporary Food Safety Environmental Health Officer for 13 weeks to undertake Food Hygiene and Food Standards Inspections across the City - £15,000.
8. The Director of Open Spaces has a local risk underspending of (£389,000) on the activities overseen by your Committee. The Director also had local risk underspending totalling (£496,000) on activities overseen by other Committees. The Director is proposing that her maximum eligible underspend of £500,000 be carried forward, of which £35,000 relates to activities overseen by your Committee for the following purposes:
- Purchase of a tractor-mounted leaf sucker – £35,000

Appendices

- Appendix 1 – Port Health and Environmental Services Committee Comparison of 2015/16 Revenue Outturn with Final Budget
- Appendix 2 – Port Health and Environmental Services Committee Analysis of Local Risk Revenue Outturn 2015/16 by Service
- Appendix 3 – Port Health and Environmental Services Committee Analysis of Movements 2015/16 Latest Approved Budget to Final Budget.

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Port Health and Environmental Services Committee
Comparison of 2015/16 Revenue Outturn with Final Budget

	Final Budget	Revenue Outturn	Variation Increase/ (Decrease) £000	Variation Increase/ (Decrease) %	Reasons
	£000	£000			
LOCAL RISK					
Director of the Built Environment					
City Fund					
Public Conveniences	671	610	(61)	(9)	1
Waste Collection	390	394	4	1	
Street Cleansing	3,900	3,873	(27)	(1)	
Waste Disposal	636	671	35	6	
Transport Organisation	122	156	34	28	2
Cleansing Services Management	439	416	(23)	(5)	
Built Environment Directorate	698	710	12	2	
Total City Fund	6,856	6,830	(26)	(0)	
Director of Markets and Consumer Protection					
City Fund					
Coroner	49	58	9	18	3
City Environmental Health	1,853	1,902	49	3	
Pest Control	38	50	12	32	4
Animal Health Services	(645)	(1,023)	(378)	(59)	5
Trading Standards	268	267	(1)	(0)	
Port & Launches	1,096	1,010	(86)	(8)	6
Total City Fund	2,659	2,264	(395)	(15)	
Director of Open Spaces					
City Fund					
Cemetery & Crematorium	(1,617)	(2,006)	(389)	(24)	7
Total City Fund	(1,617)	(2,006)	(389)	(24)	
City Surveyor	1,032	849	(183)	(18)	8
TOTAL LOCAL RISK	8,930	7,937	(993)	(11)	

Reasons for Significant Variations

Note that only variances of at least £50,000 or 10% of budget for a service are explained below.

1. **Public Conveniences** – a reduction of (£23,000) in employee costs mainly due to reduced use of overtime, together with an underspend of (£35,000) due to the planned upgrade of the Automatic Public Convenience in Aldermanbury not being completed during the year.
2. **Transport Organisation** – an increase of £43,000 in contract costs for reactive vehicle maintenance, partly offset by an increase in income of (£16,000) for recharge of maintenance costs to other departments.
3. **Coroner** – an increase in legal and witness fees which relate to the volume and complexity of inquests and are largely unpredictable.
4. **Pest Control** – a reduction in income of £11,000 for pest control services due to reduced usage as the in-house service ceased on 31 March 2016.
5. **Animal Health Services** – this underspend is primarily due to:
 - an increase in income of (£334,000) from fish imports and Passports for Pets;
 - a reduction of (£26,000) in energy costs mainly resulting from a one-off refund for prior year carbon reduction payments which were overcharged;
 - a reduction of (£30,000) in fees for veterinary services due to lower than anticipated usage;
 - additional costs of £22,000 for equipment for the newly installed Portakabin.
6. **Port and Launches** – this underspend comprises:
 - a reduction in employee costs of (£31,000) due to vacancies and reduced use of overtime;
 - additional costs of £25,000 to settle the landlord's claim for dilapidations at the end of the lease of the Thamesport office;
 - additional income of (£68,000) from grants from the FSA to enable participation in the National Feed Sampling Programme.
7. **Cemetery & Crematorium** – a reduction of (£52,000) in employee costs due to planned holding of vacancies, and an increase in income of (£346,000) as a result of a combination of factors, primarily:
 - higher prices for cremations, burials and new graves;
 - an increase in the number of families choosing or renewing memorial garden dedications; and
 - a slight increase in permits for memorials, and grave care.
8. **City Surveyor** – this underspend is primarily due to slippage in the Additional Works Programme in relation to the Cemetery & Crematorium (£132,000) and Heathrow Animal Reception Centre (£69,000).

Port Health and Environmental Services Committee
Analysis of Local Risk Revenue Outturn 2015/16 by Service

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	Final Budget			Revenue Outturn			Variance Increase / (Decrease)
	Gross Expenditure £'000	Gross Income £'000	Net Expenditure £'000	Gross Expenditure £'000	Gross Income £'000	Net Expenditure £'000	£'000
Director of the Built Environment							
Public Conveniences	1,106	(435)	671	1,052	(442)	610	(61)
Waste Collection	1,027	(637)	390	1,077	(683)	394	4
Street Cleansing	4,389	(489)	3,900	4,427	(554)	3,873	(27)
Waste Disposal	1,325	(689)	636	1,342	(671)	671	35
Transport Organisation	252	(130)	122	302	(146)	156	34
Cleansing Management	439	0	439	416	0	416	(23)
Director and Support	704	(6)	698	716	(6)	710	12
Total Director of the Built Environment	9,242	(2,386)	6,856	9,332	(2,502)	6,830	(26)
Director of Markets & Consumer Protection							
Coroner	49	0	49	58	0	58	9
City Environmental Health	2,205	(352)	1,853	2,195	(293)	1,902	49
Pest Control	131	(93)	38	132	(82)	50	12
Animal Health Services	2,291	(2,936)	(645)	2,247	(3,270)	(1,023)	(378)
Trading Standards	316	(48)	268	311	(44)	267	(1)
Port & Launches	3,041	(1,945)	1,096	3,004	(1,994)	1,010	(86)
Total Director of Markets & Consumer Protection	8,033	(5,374)	2,659	7,947	(5,683)	2,264	(395)
Director of Open Spaces							
Cemetery and Crematorium	2,778	(4,395)	(1,617)	2,735	(4,741)	(2,006)	(389)
Total Director of Open Spaces	2,778	(4,395)	(1,617)	2,735	(4,741)	(2,006)	(389)
City Surveyor							
Public Conveniences	85	0	85	116	0	116	31
Street Cleansing	3	0	3	4	0	4	1
City Environmental Health	4	0	4	0	0	0	(4)
Animal Health Services	227	0	227	198	0	198	(29)
Port & Launches	22	0	22	15	0	15	(7)
Cemetery and Crematorium	691	0	691	516	0	516	(175)
Total City Surveyor	1,032	0	1,032	849	0	849	(183)
TOTAL PORT HEALTH & ENV SRV COMMITTEE	21,085	(12,155)	8,930	20,863	(12,926)	7,937	(993)

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**Port Health and Environmental Services Committee Analysis of Movements
2015/16 Latest Approved Budget to Final Budget**

Analysis by Service Managed	Original Budget 2015/16 £'000	Latest Approved Budget* 2015/16 £'000	Final Budget 2015/16 £'000	Movement LAB to Final Budget £'000	Notes
City Fund					
Public Conveniences	1,043	1,124	1,152	28	(i)
Waste Collection	854	1,058	1,058	0	
Street Cleansing	5,777	5,938	5,938	0	
Waste Disposal	1,348	1,242	1,242	0	
Transport Organisation	0	0	0	0	
Cleansing Services Mgt	0	0	0	0	
Built Environment Directorate	0	0	0	0	
Coroner	98	96	96	0	
City Environm'l Health	2,472	2,371	2,409	38	(i)
Pest Control	113	106	126	20	(i)
Animal Health Services	416	102	102	0	
Trading Standards	349	338	338	0	
Port & Launches	1,331	1,677	1,677	0	
Cemetery & Crematorium	600	588	588	0	
Total	14,401	14,640	14,726	86	

* Latest Approved Budget as reported to your Committee in November 2015

Notes

- (i) Cost of Service Based Review related redundancies funded by transfer from central contingency.

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Agenda Item 8

Committee:	Date:
Finance Committee – <i>For decision</i>	7 June 2016
Port Health and Environmental Services Committee – <i>for information</i>	19 July 2016
Planning and Transportation Committee – <i>for information</i>	26 July 2016
Subject: Responsible Procurement Strategy 2016-2019	Public
Report of: The Chamberlain	For Information
Report Authors: Chris Bell, Head of City Procurement Natalie Evans, Responsible Procurement Manager	

Summary

City Procurement aims to help the Corporation use its buying power and collaborative business relationships to drive fundamental changes in how contractors deliver goods, services and works. The team recognises the significance of the procurement decisions we make and the huge potential to act as a catalyst for positive change. The Responsible Procurement Strategy seeks to achieve this transformation and to maximise the benefits that can be gained for our local community, the environment and everyone associated with our supply chains.

The Responsible Procurement Strategy underpins the City Procurement Strategy 2015 – 2018 in that it details how corporate responsibility will be embedded as part of the overall approach to achieving operational excellence, ensuring value for money and leveraging technology and innovation in all our future contracts. In parallel, the Responsible Procurement Strategy supports 24 existing City of London policies, strategies and frameworks and ensures compliance with ten key areas of national and international legislation. Thorough consultation with key stakeholders and collaborative planning with Category Board representatives has ensured a viable, well-targeted and proportionate approach, underpinned by value for money. The strategy has been approved at Procurement Steering Group and Summit Group.

The Procurement Policy to support the Corporation's published Air Quality Strategy is a separate document. This is due to the fact that air pollution has been classified as a Corporate "Red" risk. The procurement policy is designed, using specific actions, to support the Corporate Air Quality Strategy governed by another department and approved at Port Health and Environment Services committee in July 2015.

A copy of the full Responsible Procurement Strategy can be found in Appendix 1, a summary table of Corporate Responsible Procurement Requirements according to Spend Threshold in Appendix 2 and the Procurement Policy to support the City of London's Air Quality Strategy can be found in Appendix 3.

Recommendations

The **Finance Committee** is asked to:

- a) Approve the City of London Responsible Procurement Strategy (Appendix 1)
- b) Approve the Procurement Policy to support the Air Quality Strategy (Appendix 3).

The **Port health and Environmental Services** is asked to note the Procurement Policy to support the Air Quality Strategy (Appendix 3).

Background

1. Committing to responsible procurement not only has the potential to benefit the Corporation, but also those suppliers that we are helping to influence. It provides opportunities for innovation, allowing organisations to future proof their activities ahead of compliance. Being receptive to community needs and behaving in a sustainable and ethical manner mitigates risk, helps to optimise resource use and improves the lives of those involved in the Corporation's supply chains.
2. Responsible Procurement is the 'golden thread' running through the City Procurement Strategy 2015 - 2018. It recognises City Procurement's responsibility to help the organisation procure value for money goods, services and works, whilst maximising social value, minimising environmental impacts and ensuring the ethical treatment of people. Anticipated outcomes include helping to mitigate global issues such as climate change, driving national markets for innovative products such as low emission vehicles and addressing local priorities such as creating work-related opportunities.
3. The Responsible Procurement Strategy sets out in greater detail:
 - How City Procurement intends to meet the corporate responsibility objectives set out in the overarching City Procurement Strategy
 - Which aspects will be targeted in terms of social value, environmental sustainability and ethical sourcing
 - Which regulations and corporate policies and strategies it supports
 - How, in broad terms, responsible procurement will be implemented and governed over the next three years
4. This Strategy is supported by a series of category-specific implementation plans, developed by working groups representing different areas of spend within each Category Board. The implementation plans consist of:
 - A list of policy areas relevant to the risks/ potential of the spend category in question
 - Specific actions related to each objective under these policy commitments
 - The type of contract that the proposed action refers to
 - Which year of the 3-year strategy this aspect of the plan will be focussed on
 - Measures of success that can be used
5. Consultation has taken place with the seven Category Boards and the Procurement Steering Group. Finally, it was consulted throughout the Corporation with all of the key stakeholders as a final exercise which concluded on 20th May 2016.

Strategy Overview

6. Taking a strategic, cross-cutting and collaborative approach, the Responsible Procurement Strategy (see Appendix 1) aims to transform the existing pockets of good practice in this area into a well-planned, managed and monitored approach, delivering goods services and works in line with the Corporation's core principles and with best practice amongst our counterparts.
7. City Procurement has prioritised four strategic themes of responsible procurement:
 - Social Value
 - Environmental Sustainability
 - Ethical Sourcing
 - Value for Money
8. The three policy areas within each of the three pillars will be pursued concurrently over the lifetime of the strategy; applying the principle of achieving value for money throughout (see page 6 of the Responsible Procurement Strategy -Appendix 1- listing pillars, policy areas and objectives).
9. The additional Procurement Policy to support the Corporation's published Air Quality Strategy is a separate document due to the fact that air pollution has been classified as a Corporate "Red" risk and because the policy is designed, using specific actions, to support a separate Strategy governed by another department and committee.

Strategic Themes

10. The responsible procurement strategic themes that will deliver our aspirations during the three years are:
11. **Social Value** – we will leverage contracts to protect and enhance the health and wellbeing of local people and the local environment; engaging to a greater extent with the local community, embedding equalities principles and promoting social inclusion through targeted skills and employment opportunities; we will support local economic regeneration by paying the London Living Wage and levelling the playing field for Small and Medium sized Enterprises (SMEs), Social Enterprises (SEs) and Voluntary and Community Sector Organisations (VCSOs).
12. **Environmental Sustainability** – we will reduce our environmental impact by sourcing sustainable food, timber and other goods and by optimising environmental management practices; we will maximise resource efficiency through demand management, waste reduction and applying total cost of ownership principles; and we will minimise greenhouse gas emissions through energy efficiency and the use of renewable and other innovative technologies.
13. **Ethical Sourcing** – we will ensure that human and labour rights are protected throughout the Corporation's supply chains through compliance with international conventions and by avoiding conflict minerals; we will ensure legal and fair employment practices by collaborating to a greater extent with our supply chain

partners; and we will encourage responsible business practices amongst our contractors through good communication of our own commitments.

14. **Value for Money** – we will achieve value for money through the implementation of the Responsible Procurement Strategy by seeking the best price for the quality we require. Important quality criteria include durable, efficient, appropriately produced goods and the delivery of safe, considerate, equitable services and works projects.

Our Approach

15. In order to ensure that risk, compliance, ambition and value for money are appropriately balanced against process complexity, market maturity and lowest possible price each procurement activity is dealt with on a case by case basis, according to the following:
- Entity – The Strategy will be applied to spend in the Corporation's capacity as local/ police authority. It will also be applied to other areas of spend including City's Cash and Bridge House Estates unless there are individual circumstances that dictate that the policy should not be applied. There is a process in place to govern such instances and the associated decisions.
 - Spend – The extent of responsible procurement interventions become more significant, the higher the contract value. See Appendix 2 - Corporate Responsible Procurement Requirements according to Spend Threshold
 - Category – Risks and opportunities vary widely across categories of spend. A series of category-specific implementation plans are being developed in order to ensure viable, well-targeted approaches.
 - Contract – the following are always taken into account to maximise responsible procurement outcomes whilst mitigating supply risk and cost implications; market maturity and availability of sustainable ethical products, relative levels of competition in the market and previous tender experiences and those of peer organisations.

Conclusion

16. City Procurement has developed a Responsible Procurement Strategy for the next 3 years that translates the corporate responsibility aspirations set out in the City Procurement Strategy into a workable yet ambitious series of actions, which are supported by departments across the Corporation.

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Appendix 1 Responsible Procurement Strategy 2016-2019

Appendix 2 Corporate Responsible Procurement Requirements according to Spend

Appendix 3 Procurement Policy to support the Air Quality Strategy 2015-2018



[City of London Corporation - Responsible Procurement Strategy]

Foreword – Driving Responsible Procurement in the City

The City of London Corporation (“the City Corporation”) is committed to responsible procurement with a golden thread running through our [City Procurement Strategy 2015 – 2018](#).

In line with other public sector organisations, our mission is to achieve value for money through the delivery of services. Value for money means seeking the best price for the quality we require. Important quality criteria include efficiency, longevity, production methods and added social value.

Responsible business is good business. Those organisations with a strong commitment to corporate responsibility benefit from improved reputations, setting them apart from their competitors. Demonstrating corporate values i.e. ‘walking the talk’ through responsible business practices creates trust amongst service users, partner organisations and customers.

Embracing responsible procurement not only benefits the City Corporation, but also those suppliers that we are helping to influence. It provides opportunities for innovation, allowing organisations to future proof their activities ahead of compliance. Being receptive to community needs and behaving in a sustainable and ethical manner mitigates risk, helps to optimise resource use and improves the lives of those involved in supply chains. Employees working for organisations that take these issues seriously tend to be more motivated individuals.

We recognise the significance of the procurement decisions we make and the huge potential to act as a catalyst for positive change; to help combat global issues such as climate change using ambition and efficiency, drive national markets for innovative products, including low emission vehicles and to address local priorities such as the social exclusion of people from deprived areas.

We aim to use our buying power and collaborative business relationships to drive fundamental changes in how contractors deliver goods, services and works. The City Corporation plans to maximise the benefits that can be gained for our local community, the environment and everyone associated with our supply chains.

It is increasingly accepted that responsible procurement is becoming standard practice. Fulfilling the objectives set out in this strategy allows us to keep up with our business partners and contemporaries and by continuously improving our approach, will allow us to maintain our position as a leading, best practice organisation.

Collaboration with our peer boroughs is strengthened through our work with the London Responsible Procurement Network (LRPN) and with supply chain partners, including small and medium enterprises, local businesses, social enterprises, and voluntary and community sector organisations; through clear and effective procurement procedures, dialogue and tailored events.

In line with the City Corporation’s core values and in the spirit of the ‘four Rs’, this Strategy aims to ensure every item, service and works project procured leads to **reliable** outputs and **responsible** outcomes. It has been made **relevant** to international, national, regional and organisational policies and regulations, and is **radical** in terms of the extent of positive change it intends to drive.

The Chamberlain’s Department welcomes collaboration and feedback from other departments and stakeholders on improving our intended approach to responsible procurement.

Chamberlain,
City of London Corporation

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Responsible Procurement Strategy 2016-2019

1. Introduction

Despite being the most prosperous City in Europe by GDP, ten of London's boroughs are considered amongst the 10% most deprived areas in the UK. This is based on indices relating to income, employment, education, health, crime, barriers to housing and services and the living environment.

The City Corporation has a strong commitment to economic and social regeneration in London, with a particular focus on the City and our neighbouring boroughs. Working in partnership with businesses, local authorities and social sector organisations, the City Corporation champions and enables responsible business practice, both through its own internal policies and externally leveraging its networks. In addition, the City Bridge Trust makes grants of c. £20 million each year to improve opportunities for Londoners and the City Corporation also manages a Social Investment Fund of £20 million.

For hundreds of years, the City Corporation has been committed to the protection and conservation of open spaces for the benefit of people and the natural environment, providing London with 11,000 acres of green space. As part of the City Corporation's town planning strategy, City developers including the City Corporation's own City Surveyors are encouraged to incorporate green walls and roofs, sustainable drainage systems and sustainable infrastructure into their design, amongst other reasons to enhance urban biodiversity.

Due to intense levels of human activity in central London, City workers, residents and the visiting public are exposed to high levels of air pollution. The City Corporation works with the City's businesses and workers through its City Air programme to help improve air quality in the Square Mile. It has enacted other policies aimed at reducing air pollution and public exposure to it, like targeted action on idling engines, introducing a 20mph zone, creating a 'CityAir' app and various procurement mechanisms to reduce air pollution related to vehicles and construction works.

In terms of the City Corporation's efforts to improve efficiency and mitigate climate change, a reduction of 16% in overall energy use was achieved in 2013-14 from 2008-09 levels. Challenging energy reduction targets were adopted in 2014 as part of the City Corporation's overall strategy to reduce energy usage by 40% by 2025 from 2008 levels. It is therefore vital that the City Corporation is even more proactive in managing its energy in future years, whilst encouraging our supply chain partners to share in this commitment.

Responsible Procurement

Responsible procurement is not a new concept for the City Corporation. Many actions have already been taken such as requesting at least one out of three quotes from local businesses/ small and medium sized businesses* (SMEs)/ social enterprises as standard, using simpler terms for low value tenders to level the playing field for SMEs, establishing the Social Value Panel and investing in renewable energy installations.

**SMEs are defined as having less than 250 staff and a turnover equal to or less than €50m.*

Much of what has been achieved to date has been as a result of collaboration and effective communication with supply chain partners. Continuing to undertake such partnership working will be key to achieving the objectives set out in this Responsible Procurement Strategy.

The **Responsible Procurement (RP) Strategy** sets out how the City Corporation's wide-ranging yet concrete aspirations will be achieved by March 2019 as part of a harmonised and comprehensive approach. It aims to support the following City Corporation policies and strategies:

City of London Corporate Plan 2015 - 2019	Responsible Business Strategy 2016 (EDO)	City of London Climate Change Adaptation Strategy 2010
Chamberlain's Business Plan 2015 - 2016	City Bridge Trust Strategy 2013 – 2017	City of London Air Quality Strategy 2015 - 2020
City Procurement Strategy 2015 - 2018	City of London Sustainability Policy	City of London Noise Strategy 2012 - 2016
Employability Framework (EDO) 2016	City of London AECOM (Strategic Energy Review) (targets 2015 – 2018)	City of London Biodiversity Action Plan 2016 - 2020
Enterprise framework (EDO) 2016	City of London Climate Change Mitigation Strategy (to 2020)	City of London Transport Policy
Local Plan – City of London (Planning)	City of London Considerate Contractor Scheme (DBE)	Construction and Street works Codes of Practice
City of London Cultural Strategy 2012 - 2017	City of London Education Strategy 2016 - 2019	City of London Visitor Strategy 2013 – 2017
Contaminated Land Strategy 2015 - 2020	Road Danger Reduction Plan and Programme 2016/17 (DBE)	Section 106 Policy and Guidance

Table 1. Internal City Corporation Policy, Strategies and Frameworks that underpin the RP Strategy

Responsible Procurement is the 'golden thread' running through the City Procurement Strategy. It recognises City Procurement's responsibility to help the organisation procure value for money goods, services and works, whilst maximising social value, minimising environmental impacts and ensuring the ethical treatment of people throughout its supply chains.

The RP Strategy details how City Procurement intends to help the City Corporation strengthen its pursuit of these goals, grouped into three key pillars of Responsible Procurement, with the golden thread of value for money applying throughout.

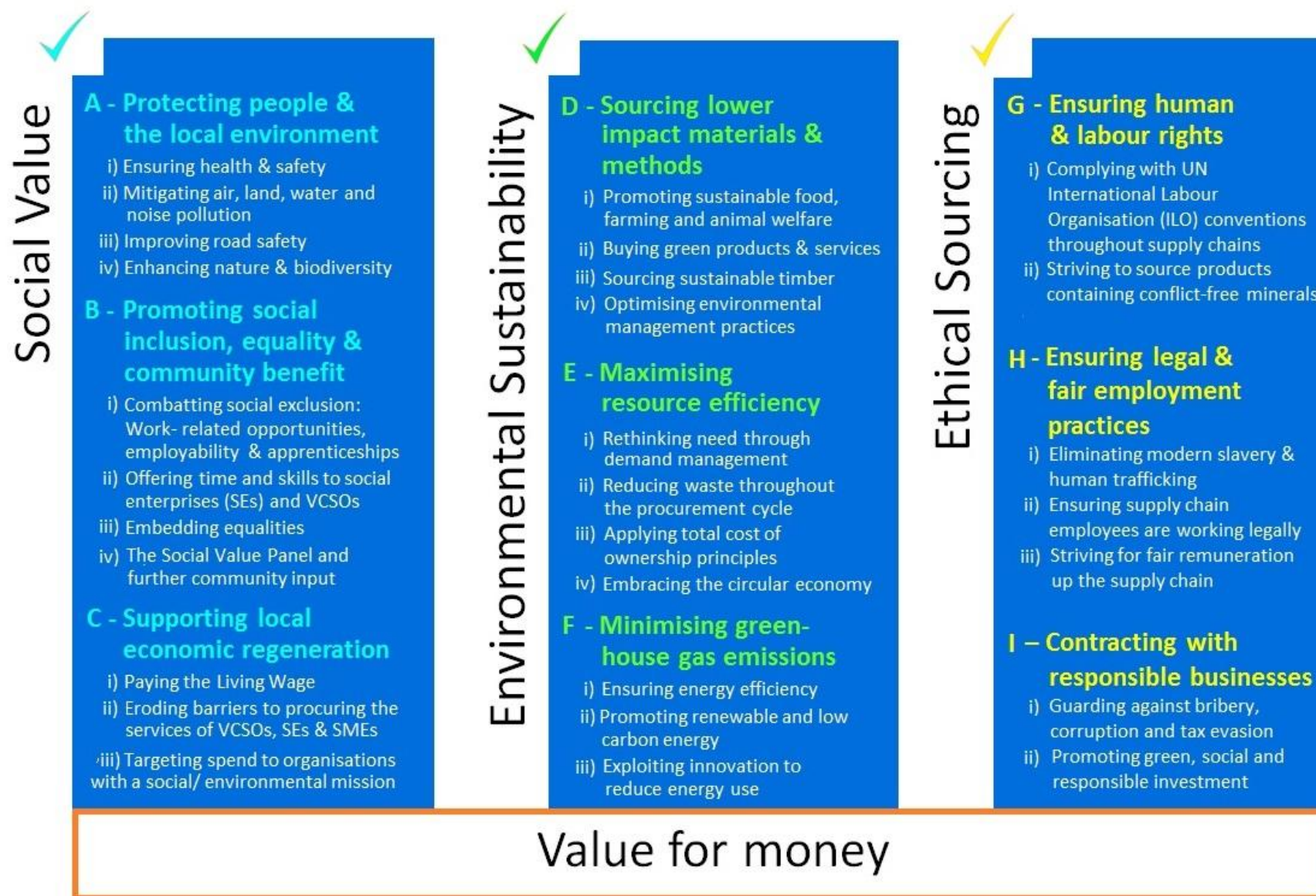
1. **Social Value** – Leveraging service and works contracts to protect and enhance the health and wellbeing of local people and the local environment, providing skills and employment opportunities and promoting the local economy.
2. **Environmental sustainability** – Minimising environmental impacts, promoting animal welfare and improving efficiency throughout the supply chains of all goods, services and works procured by the City Corporation.
3. **Ethical Sourcing** – Ensuring that human rights and employment rights are protected throughout the City's supply chains and encouraging responsible business practices.

As set out overleaf on page 6, the responsible procurement pillars are broken down into three policy areas, each with a number of specific objectives. Every objective has been expanded upon within the RP Strategy in terms of a brief background to the issue, followed by relevant international/ national or Corporate regulations and policy, finalised with a concrete commitment as to the action(s) to be taken in order to effectively implement the RP Strategy between now and March 2019.

Table 2. Pillars, policies and objectives underpinning the City of London Corporation's Responsible Procurement Strategy (overleaf)

The pillars of City of London Responsible Procurement:

Overarching policies and key objectives



2. Approach to implementation

This Responsible Procurement (RP) Strategy is wide reaching in terms of the issues it aims to tackle, the opportunities it aims to fulfil, the corporate policies it draws together and supports and the supply markets and contractors it will impact upon. The implementation of the Strategy will be led by City Procurement but will require the efforts of staff from all departments in terms of collaboration, input and feedback.

In order to ensure that this RP Strategy is viable as well as meaningful, supporting both value for money and operational effectiveness; implementation is being undertaken according to spend threshold, category risk/opportunity and the market maturity of the contract in question.

According to entity

This Responsible Procurement Strategy describes the City Corporation's approach to implementing the 'golden thread' of the City Procurement Strategy 2015 - 2018, of which the Procurement Code 2015 is a fundamental component. As with the Procurement Code, which ensures risks are minimised and procurement complies with the Public Contracts Regulations (PCR) 2015, this RP Strategy should be applied to all procurement activities carried out in the City Corporation's capacity as a local or police authority and to all externally funded or collaborative projects where it is the contracting authority conducting the procurement and signing the contract e.g. the Lottery Heritage Fund. When acting in a capacity other than as a local or police authority e.g. Bridge House Estates, the RP Strategy will be considered as applicable, unless Chris Bell, Head of Procurement is advised in writing to the contrary – in this case, due to the application of the RP Strategy acting against the best interests of the Trust.

According to spend

There are certain requirements that will automatically apply, depending on spend threshold, as they are interventions that support Corporate Policy, strategies, or wider London Regulations. Table 3 (Appendix 2) sets out each fundamental requirement under the RP Strategy. These requirements will be the basis for guidance and training on responsible procurement throughout the organisation.

The extent of each intervention is more significant, the higher the contract value. This is not only due to the fact that higher value contracts warrant a taking a more strategic approach and imply higher business and reputational risks and opportunities, but the higher the spend, the better placed the City Corporation is to drive any particular market towards more responsible outcomes.

According to category

Different risks and opportunities present themselves depending on the category of goods, services or works being procured. For example, categories that rely on materials sourced from countries with less rigorously enforced labour rights pose a higher risk in terms of ensuring ethical sourcing. These include construction materials, electronic equipment, textiles, commodities etc. Some sectors are well developed in terms of offering added social value in the form of work-related opportunities such as apprenticeships as standard, including the construction and IT industries.

Sitting under the Responsible Procurement Strategy are a series of implementation plans for each of the seven existing category boards. Some category boards with very diverse areas of spend (e.g. FM

cleaning, catering, BRM) will have more than one implementation plan. These plans are being developed by a working group of departmental stakeholders and procurement staff.

These implementation plans consist of:

- List of policy areas relevant to the risks/ potential of the spend category in question
- Specific actions related to each objective under these policy commitments
- The type of contract that the proposed action refers to
- Which year of the 3-year strategy this aspect of the plan will be focussed on
- Measures of success that can be used

Each of the seven category boards is responsible for approving and monitoring the progress of these responsible procurement implementation plans between April 2016 and March 2019. Each commitment will be measured differently as they are so diverse but they will be quantitative where possible. Progress will be presented quarterly by City Procurement as part of highlight reports to Procurement Steering Group.

According to contract

When supporting departments with tactical or strategic procurement exercises (those over the OJEU threshold), potential responsible procurement interventions are assessed by City Procurement on a case-by-case basis. The department contact(s), category manager and responsible procurement manager generate ideas according to the category of spend, but will take into account the following in order to mitigate against supply risk and cost implications:

- Current market maturity/sensitivity and availability of sustainable/ethical products or methods and/or prevalence of social value offerings.
- Previous tender exercises and other past experience, in order to determine what is reasonable to either specify or incentivise, taking into account relative levels of competition in the market.
- Similar projects undertaken by peer organisations, using their experiences to gather information on potential risks. This knowledge sharing is facilitated by the City Corporation's position as co-Chair of the London Responsible Procurement Network (LRPN).
- When considering two different actions to support RP, which may counteract one another, the following will be taken into account in turn: level of risk → market availability → potential opportunities. For example, not imposing strict air quality requirements within a contract involving substantial use of vehicles/ plant/ machinery/ construction equipment poses a significant risk to the Corporation, City residents, workers and visitors. In this instance, improving air quality would be prioritised over creating opportunities for SMEs.

Responsible procurement requirements/ supplier evaluation criteria would be relatively basic in underdeveloped markets, but where there is tight competition they can be used to separate the field and help the City Corporation maximise social value and minimise environmental damage.

Value for money



Public sector organisations are required to adhere to Local Government Act 1999, Public Services (Social Value) Act 2012 and the PCR 2015. The City Corporation's aim, in line with its counterparts, is to achieve value for money through our procurement activities. Best value for money is defined by the Government as the most advantageous combination of cost, quality and sustainability to meet customer requirements.

A summary is provided as part of Table 3 (Appendix 2), which constitutes a breakdown, according to cost threshold, of responsible procurement requirements.

Responsible Procurement Strategy: The detail

The City Corporation's three pillars of responsible procurement are social value, environmental sustainability and ethical sourcing. Value for money is the golden thread running through all three aspects. As set out in Table 2 on page 6, there are three policy areas within each pillar. Every one of these nine policy areas has between two and four objectives, the achievement of which represents successful implementation of the Responsible Procurement (RP) strategy.

The remainder of this document goes into more detail on these objectives in terms of the issue at hand i.e. why these aspects are being targeted, followed by any related City Corporation policies or wider UK regulations and a specific commitment to ensure that all relevant procurement practices support the objective in question.

Commitments denoted with a  symbol are 'must do' requirements, whereas those with a  symbol are aspirational commitments. The former are based on City Corporation Policy, approved strategies/ frameworks or UK legislation, whereas the latter constitute industry or public sector best practice.

Pillar 1: Social Value

Policy A: Protecting People and the Environment

Safeguarding Health and Safety

Issue: Whilst many employees in the City will not face significant hazards as part of their day to day work, there remain a number of high risk activities such as window cleaning or engineering work that go on around us all the time.

Regulations /City Corporation Policy: The basis of health and safety law is the [Health and Safety at Work Act 1974](#). The [Management of Health and Safety at Work Regulations 1999](#) make these duties more explicit. City Corporation has its own [Health & Safety Statement and Policy](#).

Commitment: The City Corporation will make health and safety an inherent part of the procurement process; using principles for effective management of health and safety risk to ensure that the City Corporation's contractors have appropriate governance in place. For strategic/ high risk contracts, this will involve support from the Health & Safety teams within Town Clerk's and/ or City Surveyor's departments. For other projects, IOSH's [Public Service Procurement: Health and Safety Checklist](#) provides useful guidance.

Improving Road Safety

Issue: The number of people killed or seriously injured (KSI) on London's roads in 2014 was 2,167, down from 2,324 in 2013. This is the lowest annual number since records began, but the Mayor of London and TfL have set a target of a 50% per cent reduction in KSIs by 2020.

Regulations /City Corporation Policy: The Built Environment Department has established the Corporation's most recent [Road Danger Reduction Programme and Plan 2016/17](#) and is currently developing a "Road Danger Reduction Policy", which will contain such requirements as registration with CLOCS and attainment of at least bronze level in the Fleet Operator Recognition Scheme (FORS). Other relevant road safety [initiatives](#) include the Construction Logistics and Cyclist Safety

(CLOCS), TfL's Work Related Road Risk (WRRR) requirements, along with the Mayor of London's Safer Lorry Scheme.

Commitment: The City Corporation will use procurement and contractual mechanisms to ensure that all relevant contractors register with the Fleet Operator Recognition Scheme (FORS). They will also be encouraged to achieve Bronze accreditation before progressing to Silver and Gold accreditation status. City Procurement will work with the City Corporation's Road Safety team to ensure that relevant initiatives are being supported through all procurement activities.

Mitigating Air Pollution

Issue: Levels of nitrogen dioxide (NO₂) and fine particles (PM₁₀) in the City persistently exceed EU health based targets. Nearly 9,500 people die early each year in London due to exposure to such air pollutants. London and several other British cities have been in breach of EU safety limits on NO₂ for five years, prompting legal action by NGO ClientEarth through the Supreme Court, which ordered the UK Government to clean up the air 'as soon as possible'. The EC has also instigated infraction proceedings against the UK for its failure to cut excessive levels of NO₂.

Regulations /City Corporation Policy: [The City of London Air Quality Strategy 2015 – 2020](#) is a statutory document. The City Corporation has officially classified air quality as a corporate risk. Also of relevance is the City Corporation's Transport Policy and accompanying guidance, the [Mayor of London's Air Quality Strategy](#) and associated documents, including supplementary guidance on implementing the Low Emission Zone (LEZ) and upcoming Ultra-Low Emission Zone (ULEZ).

Commitment: A number of commitments are detailed in the Appended "Procurement Policies to support the City of London Air Quality Strategy". This document lists actions to comply with the Air Quality Strategy, the City Corporation's Transport Policy, or both including disallowing the purchase of diesel vehicles, requiring investigation into alternative fuel vehicles, setting emissions requirements for non-road mobile machinery (NRMM) and committing to the use of petrol-hybrid taxis as a minimum within corporate contracts and agreements.

Further intended actions to support the above include exploring the use of consolidation centres for our own deliveries and those of works contractors, incentivising relevant suppliers to use zero emission capable vehicles, and a longer term commitment to geo-fence the Square Mile; requiring taxis used corporately to automatically switch to electric mode by GPS.

Mitigating Noise Pollution

Issue: Noise pollution can have detrimental effects on human health, amenity, productivity and the natural environment. Eliminating or reducing excessive noise is a legal responsibility and helps to limit the disturbance of residents and businesses, caused by the City's activities and operations.

City Corporation Policy and Commitments: Relevant contractors will be made aware of and will be required to adhere to the City Corporation's [Noise strategy and policy](#) during the procurement and contract management process. This includes ensuring that the requirement to comply with the City Corporation's Codes of Practice for [Deconstruction and Construction Sites](#) and for the [Minimisation of the Environmental Impact of Street works](#).

[Guidance on noise minimisation](#) relating to construction/ demolition, street works, deliveries, machinery, equipment and vehicles has been provided by the [Pollution Control Team](#).

Mitigating Land and Water Pollution

Issue: Works contracts and services involving deliveries are the two key areas of procurement that can lead to the contamination of land and water courses. Construction works can cause soil contamination and a loss of biodiversity through habitat degradation. Street works, and road transport deliveries of construction materials and other goods can lead to damaging rainwater run-off arising from road surface treatments, tyre abrasion, fuels and lubricants.

Regulations /City Corporation Policy: The City Corporation has a Code of Practice for [Deconstruction and Construction Sites](#), which includes aspects such as waste and materials handling and storage, contaminated land, water, light pollution and sustainability and preservation. The City Corporation also has its own [Contaminated Land Strategy](#) 2015 - 2020. The [City of London Considerate Contractor \(Street works\) Scheme](#), and associated [Code of Good Practice](#) is also of relevance.

Commitment: The City Corporation will use procurement and contractual mechanisms to ensure that building and civil engineering contractors adhere to the relevant Codes of Practice. Contractors will also be required to sign up to the City of London Considerate Contractor Scheme (CCS) where relevant.



Supplier evaluation criteria may be used to incentivise construction contractors to achieve the highest possible level of attainment of the City of London Considerate Contractor's Scheme.

Enhancing nature and biodiversity

Issue: Land use conversion to accommodate growing human populations, along with associated pollution, climate change and introductions of invasive species have an adverse impact on native wildlife and biological diversity. The RSPB's 2013 State of Nature Report found that 60% of UK species including invertebrates, plants and vertebrates, have decreased in abundance and distribution, with 31% having strongly decreased, over the last 50 years.

Regulations /City Corporation Policy: The 'UK Post-2010 Biodiversity Framework' (2012) was developed in response to the Convention on Biological Diversity's (CBD's) [Strategic Plan for Biodiversity 2011-2020](#) and the [EU Biodiversity Strategy \(EUBS\)](#) (2011). The City of London Biodiversity Action Plan (BAP) is a document produced every five years by City Gardens, the most recent Plan being 2016-2020, in response to the Natural Environment & Rural Communities (NERC) Act (2006) and as a requirement of the National Planning Policy Framework (NPPF).

Commitment: The current City of London BAP identifies current target species as being House Sparrows, Black Redstarts, Swifts, Peregrine Falcons, Bats, Bumblebees and Stag Beetles. Departments responsible for works contracts and maintaining green spaces will ensure that contractors delivering new developments, refurbishments or service contracts do not impact the existing habitats of these species without including adequate mitigation. The same applies to satellite sites, especially Open Spaces recognised as internal, national or regionally important habitats. City Procurement will work with City Surveyors, Built Environment and Open Spaces to



enhance biodiversity as part of relevant procurement projects by creating target habitats for target species where feasible both within the Square Mile and within other Corporation assets.

Guidance such as the [GRO Green Roof Code of Best Practice \(2014\)](#) and the [City's Green Roofs Research Advice Note](#) will be made available.

Policy B: Promoting Social Inclusion, Equality & Community Benefit

Combatting social exclusion: Work-related opportunities, employability & apprenticeships

Issue: Ten of London's boroughs are amongst the 10% most deprived areas in the UK. Work is the most important [route out of poverty](#) and is largely a sustainable outcome when individuals are supported to access work that offers progression and training opportunities.

Regulations /City Corporation Policy: EDO's Employability Framework and Public Services (Social Value) Act 2012 and the City Corporation's Section 106 Policy and Guidance.

Commitment: City Procurement and service departments will support the City Corporation's Employability Framework and will require and/or incentive work-related opportunities including job starts, placements, apprenticeships and training opportunities within contracts relevant to entry-level roles. Opportunities will be targeted at London's most deprived communities (or those surrounding satellite sites where relevant) and socially excluded groups (e.g. people in long-term unemployment) within contracts. City Academies will be targeted where appropriate. City procurement will also work with Planning and EDO to harmonise City Procurement's approach with the City Corporation's Section 106 Policy and Guidance.



Offering time and skills to Social Enterprises (SEs) and Voluntary and Community Sector Organisations (VCSOs)

Issue: There are c. 70,000 SEs in the UK and their growth by turnover (38%) is outstripping that of SMEs (29%). 29% of all UK SEs are three years or younger. The public sector often commissions VCSOs to undertake services on their behalf as they are better placed to understand the needs of services users and communities. Such sectors need support to thrive in order to build a sustainable pipeline of businesses able to deliver procurement needs and social/environmental impact.

Regulations /City Corporation Policy: The City Corporation, through the work of the Economic Development Office's Corporate Responsibility team, aims to up-skill VCSOs and SEs so that they are able to grow their impact sustainably. The City Bridge Trust grants c. £20 million annually to charitable projects working to provide benefits and opportunities to the inhabitants of Greater London and manages a social investment fund, which provides loan finance to SEs and VCSOs.

Commitment: City Procurement will work with service departments to incentivise contractors to commit to sharing time and skills with SEs and VCSOs as part of their offer of added social value. Suggestions will include training, mentoring and other voluntary forms of assistance. Offers will be channelled through existing relationships established by the Economic Development Office, particularly [City Action](#) and City Bridge Trust grantees. Actions taken by City Procurement will also reflect the City Corporation's upcoming Responsible Business Strategy.



Embedding equalities considerations

Issue: Discrimination is still an issue in the UK. The 2012 Labour Force Survey found that disabled people remain significantly less likely to be in employment than non-disabled people. According to the Office for National Statistics, the overall trend shows that employment rates between 2001 and 2014 are lower for broad ethnic minority groups than the 'White' ethnic group and in 2015 the gender pay gap remained static at 19.2%. The protected characteristics under the [Public Sector Equality Duty](#) are age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, and pregnancy and maternity.

Regulations /City Corporation Policy: The [Equality Act 2010](#) streamlined all existing UK Equalities legislation. The [Public Sector Equality Duty](#) requires public authorities to have due regard to and demonstrate compliance with the three Equality Aims in the procurement process; to eliminate discrimination, harassment and victimisation; advance equality of opportunity and foster good relations. Public authorities cannot delegate their obligations under the general duty to any contractors. The City Corporation also has its own [Equal Opportunities Policy & Statement](#).



Commitment: City Procurement will work with HR and service delivery leads from the Equality and Inclusion Board to ensure the due regard to the public sector Equality Duty. The City Corporation will work with external support organisations, such as Stonewall, to help achieve this.

Guidance set out by the Equality & Human Rights Commission in 2013 will be used to address this issue at each stage of the procurement process and strive to go beyond the Duty to ensure that contractors take a comprehensive approach to equality, diversity and inclusion.



The Social Value Panel and further community input

Issue: The City Corporation established a Social Value Panel in 2014, made up of representatives from local business, community and environmental sectors to undertake consultations on the economic, social and environmental impacts of relevant contracts. However, there is still far more than can be done to require and monitor added social value in procurement activities, and to continuously improve transparency and levels of engagement with the local community, including the visiting public.

Regulations /City Corporation Policy: The Public Service ([Social Value](#)) [Act 2012](#) requires public authorities to consult with relevant stakeholders on how social value may be leveraged within service contracts. All such contracts over OJEU are brought to the Social Value Panel to seek input and feedback.

Commitment: The City Corporation will continue to use the Social Value Panel to maximise social value from our contracts, ensuring that: all relevant stakeholders are represented; governance, including internal communication procedures, are optimised; as many recommendations as possible are integrated and monitoring and reporting on the social value aspects of service contracts becomes more transparent and robust.



The City Corporation intends to increase the breadth and scope of the Social Value Panel by including high value works contracts and gradually reducing service contract thresholds, especially sensitive contracts with a significant impact on communities. Another commitment is to engage to a greater extent with the general public and with local communities so they can effectively input into the delivery of services and construction projects.



Policy C: Supporting local economic regeneration

Paying the Living Wage

Issue: The UK is the world's sixth largest economy, yet 1 in 5 of the UK population live below our official poverty line, meaning that they experience life as a daily struggle. Ten of London's boroughs are amongst the 10% most socially deprived areas in the UK.

Regulations /City Corporation Policy: The City Corporation became a [Living Wage Accredited Employer](#) in 2014. Under the Living Wage Policy, the Corporation is committed to paying all staff and contractors the London and UK Living Wage rates, including annual uplifts.

Commitment: The City Corporation will continue to fulfil its commitment as a Living Wage Employer and will work with peer boroughs to strive to successfully implement the payment of the Living Wage across the most complex, cross border services.



Supported by service departments, it will produce case studies to justify the continued payment of the Living Wage.

Eroding barriers to procuring the services of VCSOs, SEs and SMEs

Issue: Small and Medium Enterprises (SMEs), scale-ups, VCSOs and SEs are often based in the most disadvantaged communities, are more likely to recruit locally and diversely, and to spend resources locally. Purchasing from these organisations thus has a multiplier effect of bringing economic regeneration to communities. As smaller organisations, they are often able to provide a better customer experience e.g. by being flexible, developing relationships and reducing carbon emissions.

Regulations /City Corporation Policy: Central government has committed 1/3 of its spend to SMEs, setting the tone for others to follow. The Public Services (Social Value) Act requires public sector bodies to consider how a procurement project might improve the economic, social and environmental well-being of the relevant area, as part of the pre-procurement process. The City Corporation is committed to economic regeneration in London and supporting neighbouring boroughs, which is a Core part of the Corporate Plan and is central to EDO's business plan in particular.

Commitment: City Procurement will continue to work with EDO and service departments to ensure that supply chain opportunities are accessible to SMEs, SEs and VCSOs. The City Corporation will continuously improve its approach by ensuring that procurement processes, contract types and sizes, and standard terms and conditions support this outcome. EDO's Enterprise Strategy (to be published in 2016) will provide a framework to facilitate this work. City Procurement will work with Capital E Sourcing to improve monitoring, ensure continuous improvement and facilitate reporting in this area.



+ Supplier engagement events targeting these and other organisations will also be used to a greater extent in future to learn from the market and create further opportunities

Targeting relevant categories towards organisations with an environmental/social mission

Issue: Procuring from organisations that have a positive social or environmental impact, and that mitigate against negative social or environmental impacts, enables the City Corporation to generate additional positive outcomes within its purchasing decisions. This is particularly important at a time when all sectors are under budgetary pressures. For example, this enables the City Corporation to increase its impact without additional cost. It also enables the organisations the City Corporation buys from to secure business and grow their impact.

Regulations /City Corporation Policy:

Social enterprises and VCSOs are well placed to deliver positive social and environmental impact, as this is core to their mission. The Economic Development Office has played a key role in building the demand for the products and services of social sector organisations.

Commitment: Alongside various relevant services commissioned by DCCS, City Procurement will initially target three categories of spend; Waste streams (e.g. disposal of IT equipment), event catering and print & design. Various procurement mechanisms will be used to facilitate the inclusion of social enterprises in the print and design framework contract. When catering for events, service departments will be encouraged to seek more than one quote from organisations with an

environmental or social mission. The [Buy Social Directory](#) provides a list of social enterprises within these sectors to enable service departments to go out for quotes.

When disposing of equipment with a relatively low residual value, such as end-of-life IT equipment or white goods with relatively high repair costs, City Procurement will leverage maximum social value by disposing of it through the most appropriate SE/ VCSO. The City Corporation will also incentivise contractors to use organisations with a social or environmental mission in their own supply chains.



Policy	Specific Objective	Year 1	Year 2	Year 3
A: Protecting people and the local environment	Ensuring health and safety			
	Mitigating air and noise pollution			
	Mitigating land and water pollution			
	Improving road safety			
	Enhancing nature and biodiversity			
B: Promoting social inclusion, equality and community benefit	Combatting social exclusion through targeted employment			
	Offering time, skills and support to social enterprises and VCSOs			
	Encouraging community input			
C: Supporting local economic regeneration	Paying the living wage to staff and contractors			
	Eroding barriers to working with VCSOs, SEs & SMEs			
	Targeting relevant categories of spend towards organisations with an environmental/social mission			

Implementation timeline – main areas of focus over the three years, Pillar 1: Social Value

Pillar 2: Environmental Sustainability

Policy D: Sourcing lower impact materials and methods

Promoting sustainable food, farming and animal welfare

Issue: There are a diverse range of environmental and ethical impacts associated with exploiting land and animals for human consumption including; soil degradation, contamination of water courses, overfishing and the unnecessary suffering of farm animals. Animal testing for cosmetic and commercial (as opposed to medical) purposes can also be constituted as avoidable animal suffering.

Regulations /City Corporation Policy: The City Corporation is a signatory to the [Sustainable Fish Cities](#) Pledge and has a stand-alone policy on the welfare of egg laying hens. The [Alliance for Better Food and Farming](#) work with leading organisations that drive sustainable food sourcing including the Marine Stewardship Council (MSC) and Compassion in World Farming to encourage and benchmark London Boroughs on sustainable food sourcing. The UK's [Government Buying Standards](#) (GBS), which the City Corporation is committed to using as part of the Procurement Code 2015, also have a set of criteria for [Food and Catering](#).



Commitment: The City Corporation is committed to using the UK Government Buying Standards for Food & Catering in relevant specifications, award criteria and contract clauses.



Using the indices set out in the [Good Food for London Report](#) as a framework, City Procurement will go beyond these foundations and in collaboration with the service

departments' Catering Group will encourage departments to specify and incentivise sustainable food and catering services, fresh food of a high nutritional value produced through low environmental impact farming methods and high standards of animal welfare. A list of criteria and specification recommendations for all catering contracts will be produced, based on these indices and the GBS.

Buying green products and services

Issue: Products purchased, or those provided as part of works or service contracts, can have a wide range of environmental impacts including the generation of waste, the use of hazardous materials, local air pollution, use of finite resources and greenhouse gas (GHG) emissions.

Regulations /City Corporation Policy: The City Corporation is committed to using the UK [Government Buying Standards](#) (GBS) criteria, as part of the Procurement Code 2015. The [Greening Government Commitments](#) (2011) detail the targets set out by the government to reduce the nation's environmental impact.

Commitment: Officers must use the [Government Buying Standards](#) (GBS) 'Mandatory' criteria for all relevant product categories, City Procurement will train service departments on the use of GBS and the inclusion of environmental criteria when procuring goods, services or works.



Sourcing sustainable timber

Issue: An estimated 13 million hectares of forests were lost each year between 2000 and 2010 due to deforestation. In tropical rainforests particularly, deforestation is an urgent environmental issue that jeopardizes communities and livelihoods, threatens species, and intensifies climate change.

Regulations /City Corporation Policy: The [EU Forest Law Enforcement Governance and Trade \(FLEGT\) Action Plan \(2003\)](#) was designed to prevent the trade in illegal wood, to improve the supply of legal timber and to encourage demand for wood from sustainably managed forests. FLEGT gave rise to the [European Union Timber Regulation \(EUTR\) 2013](#) and the Timber and Timber Products Regulation (2013) was its transposition into British statute. The UK also established a [Government Timber Procurement Policy](#).

Commitment: There are Government buying Standards for both [paper](#) and [sustainable wood products](#). The City Corporation will use procurement and contractual mechanisms to ensure that all timber-based products procured directly, or as part of works and service contracts, are sustainably sourced. This will be aligned with the UK Timber Procurement Policy.



Optimising environmental management practices

Issue: Commercial activity of almost any sort has an impact on the environment, the severity of which varies between industries and individual organisations. Areas include local noise pollution, local and global air pollution, land and water contamination throughout the supply chain, land use change and the loss of biodiversity, waste generation and the depletion of natural resources.

Regulations /City Corporation Policy: The [City of London Sustainability Policy](#) sets out key areas of focus, including specific environmental commitments designed to respect the limits of the environment, resources and biodiversity. When buying goods, services and works, the City Corporation expects its contractors to share these commitments in the undertaking of their work.



Commitment: City Procurement will work with service departments to ensure that contractors have robust environmental management systems in place, proportionate to the

size and nature of the contract, by using pre-qualification criteria. Optimal environmental management undertaken as part of specific contracts will be incentivised through the use of supplier evaluation criteria.

Policy E: Maximising resource efficiency

Issue: In the UK food sector alone, 12 million tonnes of waste was generated in 2013; 75% of which could have been avoided. This had a value of over £19 billion a year, and was associated with at least 20 million tonnes of greenhouse gas (GHG) emissions. The unsustainable generation of waste applies to all areas below, as does the depletion of finite resources such as metal ores and fossil fuels.

Rethinking need through demand management

Additional benefit: Reducing unnecessary consumption by re-thinking the way in which need may be satisfied often present more efficient solutions, which usually represent better value for money.

Commitment: All departments should aim to minimise the use of raw materials such as food, paper, water and fuel as part of their everyday work. To this end, service departments will be encouraged to a) spend extra time considering alternative solutions during the pre-procurement process and b) use output-based specifications.

Reducing waste throughout the procurement cycle

Regulations /City Corporation Policy: The [City of London Waste Strategy 2013 – 2020](#) sets out the way in which the City Corporation will abide by and go beyond all UK waste regulations and targets.

Additional benefit: As well as operating more efficiently and reducing waste generation, there are significant financial savings to be made by avoiding [landfill tax](#) and other penalties.

Commitment: City Procurement will work with service departments and Built Environment to implement the principles of the City of London Waste Strategy within procurement activities. Dedicated organisations such as [WRAP](#) and the [London Waste and Recycling Board](#) will be consulted on the design of procurement procedures in order to ensure waste minimisation, throughout the life cycle of the product, service or works, is considered effectively as early as possible.

Applying total cost of ownership principles

Additional benefit: As part of the City Procurement Strategy, total cost of ownership will be used to ensure that the City Corporation is achieving best value for money throughout the whole lifetime of products or buildings.

Commitment: With support from City Procurement where required lifecycle costing exercises will be undertaken by all service departments before purchasing all vehicles, items of energy-using equipment and during the design phase of all major construction or refurbishment projects.

Embracing the circular economy

A circular economy is one that is restorative and regenerative by design, and which aims to keep products, components and materials at their highest utility and value at all times, distinguishing between technical and biological cycles.

Regulations /City Corporation Policy: [Towards a circular economy: A zero waste programme for Europe](#) was published in 2015. It has set waste reduction requirements for EU Member States.

Additional benefit: The City Corporation has the possibility to operate more efficiently, reduce costs and help to create jobs by applying circular economy principles.

Commitment: City Procurement will use practical guidance such as that on [Employment and the Circular Economy](#) and work with organisations such as [WRAP](#), the [London Waste and Recycling Board](#) and [Green Deal](#) forerunners in Europe to set circular economy targets.



Policy F: Mitigating and Adapting to Climate Change

Issue: Climate change, driven by the release of greenhouse gas emissions (GHGs) is causing a range of adverse impacts across the globe including the loss of polar ice sheets and accelerated sea level rise. In some regions extreme weather events, rainfall and flooding are becoming more common while others are experiencing more extreme heat waves and droughts. These complex impacts are described in full in the [Intergovernmental Panel on Climate Change \(IPCC\)'s Fifth Assessment Report](#).

Regulations /City Corporation Policy: There are a range of incentives and legislation designed to drive down the release of GHGs, on international, UK, London and organisational level. These have informed the objectives and commitments below. The most recent UN Framework Convention on Climate Change conference in [Paris, COP21](#) has set the tone for active, positive change to drastically reduce the emission of GHGs worldwide. It was agreed that action would be taken to ensure that the global average temperature increase remains below 2C relative to pre-industrial levels.

The UK [Climate Change Act \(2008\)](#) has set legally binding reduction targets. The City Corporation is implementing a [Climate Change Mitigation Strategy](#) (to 2020) and [Climate Change Adaptation Strategy 2010](#). A Strategic Energy Review was undertaken in 2013 with a view to achieve the 40% reduction by 2025 from 2008 levels. The latest [Carbon Descent Plan](#) is available upon request.

Ensuring energy efficiency

Avoiding unnecessary energy use is always the first necessary step. This means not heating, cooling, lighting or powering buildings at times when it can be avoided and minimising usage at other times.

Additional benefits: The more efficiently energy is used, the greater the financial saving and the less dependent the City Corporation is on all forms of energy.

Commitment: In line with [EU Energy Efficiency Directive](#) principles, Government Buying Standards for [electrical goods](#) and [ICT equipment](#), the City Corporation will seek to procure the most energy efficient products, including vehicles (balanced with air pollution considerations). Using natural light and ventilation where possible and using lifecycle costing calculations during the design process, City Surveyor's will opt for the most energy efficient solutions as part of capital, additional and cyclical works, in line with practicality and best value principles. Another important corporate commitment is that the energy itself is generated in the most efficient way.



Promoting renewable and low carbon energy

Additional benefits: Other benefits of supporting the UK renewable energy industry are improved energy security and a move away from investment in fossil fuels; associated with risks including the physical impacts of climate change, increasingly stringent regulation and policy and increased competition from alternatives and technological innovation.

Commitment: City Procurement will assist service departments ensuring that the energy used by the



City Corporation has the lowest possible associated carbon emissions, including help with exploring the optimum methods to procure renewable energy installations.



It will also seek to encourage the procurement of biomethane e.g. to fuel the Citigen CHP system, and renewable electricity through Corporate contracts, working in collaboration with energy providers and peer boroughs using the same frameworks in order to drive demand.

Exploiting innovation to reduce energy use

Additional benefit: In recognition of the City Corporation's prosperity and potential to inspire other public and private sector organisations, trialling and using innovative, low energy technologies could lead to a multiplier effect. The potential would be increased through collaboration.

Commitment: City Procurement will encourage service departments to use output based



specifications and other procurement techniques that facilitate innovative solutions. It will work with service departments to explore the potential of related UK and EU initiatives.

Ensuring climate change resilience

Additional benefit: Ensuring climate change resilience means opting for sustainable, durable solutions in the face of changing temperatures and other weather patterns. It recognises the fact that we must evolve our approach in order to deal with problems created by these changes such as avoiding overheating, reducing flood risk and undertaking resilient landscaping and planting.

Commitment: City Procurement will use the climate resilience expertise within the Planning



Department to support service departments with effectively considering resilient solutions from the pre-procurement and design phase onwards.

Policy	Specific Objective	Year 1	Year 2	Year 3
D: Sourcing lower impact materials and methods	Promoting sustainable food and farming			
	Buying green products and services			
	Sourcing sustainable timber			
	Optimising environmental management practices			
E: Maximising resource efficiency	Using demand management			
	Applying the waste hierarchy to procurement			
	Using total cost of ownership			
	Embracing the circular economy			
F: Minimising GHG emissions	Ensuring energy efficiency			
	Promoting renewable energy			
	Exploiting innovation			
	Climate Change Resilience			

Implementation timeline – main areas of focus over three years, Pillar 2: Environmental Sustainability

Pillar 3: Ethical Sourcing

Overarching commitment: Due to the contractual, financial and operational complexity of ethical sourcing throughout extended and global supply chains, an Ethical Sourcing Steering Group will be set up following the procedure set by CPDU. The outcome will be an established Ethical Sourcing Policy, accompanied by an action plan for each high risk procurement category, detailing which procurement or contractual mechanism will be used to set requirements and how good practice will be verified. This Ethical Sourcing Policy will cover the majority of objectives that form part of Pillar 3.

Policy G: Ensuring human and labour rights

Complying with UN International Labour Organisation (ILO) conventions throughout supply chains

Issue: Due to the globalised and extended nature of supply chains involved in producing and distributing goods such as electronic equipment, textiles, agricultural commodities and construction materials, there is a high risk of the use of child labour and the contravention of other internationally recognised human and labour rights. Although child labour globally has declined by a third since 2000, there are still 168 million children working, more than half of which in hazardous conditions.

Regulations /City Corporation Policy: The ILO's Governing Body has identified [eight 'fundamental' conventions](#) covering principles and rights at work including: Forced Labour, Child Labour, Freedom of Association, Right to Organise & Collective Bargaining, Equal Remuneration and Discrimination. Procurement Policy Notes such as [Procuring steel in major projects](#), provide government guidance.

Commitment: The City Corporation will ensure that, throughout its supply chains, workers have their human and labour rights respected. Primarily, the focus will be on high risk, strategic and/or high spend contracts, and progress towards this aim will initially be achieved through collaboration with our supply chain partners. Other methods such as using contract clauses and piloting verification methods will be looked into, including exploring the use of independent audits for high risk categories, and affiliations with dedicated organisations.



Striving to source products containing conflict-free minerals

Issue: The mineral trade has funded violence and armed conflict for decades. Despite international legislation, conflict minerals including gold, tin, tantalum, and tungsten, often mined by children, enter global markets and end up in products such as computer equipment and vehicles.

Commitment: The City Corporation will establish a procedure to identify products purchased or provided as part of service or works that contain minerals at high risk of being sourced from conflict zones. A conflict-free resolution will then be developed, committing the City Corporation to ensuring that all high risk products are procured ethically using appropriate procurement procedures and contract terms.



Policy H: Ensuring legal and fair employment practices

Eliminating modern slavery and human trafficking

Issue: Modern slavery is a global crime, with victims often being trafficked between source, transit and destination countries. The Global Slavery Index estimates there are 35.8 million victims of slavery, while in 2012 the ILO estimated that there were 21 million victims of forced labour alone.

Regulations /City Corporation Policy: The Public Procurement (Amendments, Repeals and Revocations) Regulations 2016 require offences under section 2 or 4 of the [Modern Slavery Act 2015](#) to be a mandatory exclusion criterion during pre-qualification.

Commitment: City Procurement will help to ensure appropriate contractual requirements are put in place and will encourage service departments to verify compliance. UK guidance on [Transparency in Supply Chains](#) and collaboration with other public sector bodies will be used to foment a robust approach to tackling this issue.



Ensuring supply chain employees are working legally

Issue: The last estimate of the number of people living in the UK illegally was made in 2009, which gave a range of between 420,000 and 860,000. This has a negative impact on the remuneration, employment terms and job opportunities of those people that do have a legal right to work in the UK. Undocumented workers are at risk of exploitation, working in dangerous conditions and immigration-related threats.

Regulations /City Corporation Policy: it is illegal to work in the UK without the right to do so under EU law or the relevant official permission from the UK government.

Commitment: City Procurement will work with contract managers to ensure contractual provisions are in place to stop contractors and sub-contractors hiring illegal workers and spot checks are carried out where appropriate. [Government guidance](#) is available.



Striving for fair remuneration up the supply chain

Issue: Within increasingly globalised supply chains, measures must be put in place by buyers to ensure that workers up the supply chain are paid a fair wage for their labours.

Regulations /City Corporation Policy: The City of London has been recognised as a Fair Trade Zone since 2007. The City Corporation passed an official [Fair Trade Resolution](#) to directly purchase Fairtrade products wherever possible and ensure catering and other relevant contractors share this commitment.

Commitment: Fair Trade products are included in City Procurement's list of criteria for the Catering Core Group, which will henceforth be written into catering contracts where practicable. Externally, City Procurement, the Corporate Responsibility team and Heart of the City will work with the City of London's Fair Trade Steering Group to ensure that City businesses are aware of the benefits of fair remuneration and are encouraged to source Fair Trade or equivalent products.



Policy I: Contracting with responsible businesses

Guarding against bribery, corruption and tax evasion

Issue: Bribery, corruption and tax evasion undermines the rule of law, distorts markets and confers unwarranted advantages. In 2014, 44% of companies reported an incidence of fraud. The cost of fraud to the UK in 2014 was £52 billion according to the National Fraud Authority.

Regulations /City Corporation Policy: The [Competition Act 1998](#), the [Enterprise Act 2002](#) and the [Bribery Act 2010](#) set out the regulatory framework in the UK. The City Corporation has a series of [policies and strategies](#) designed to tackle these issues. Tax evasion is also a criminal offence but new [UK sanctions](#) have been developed to fortify the UK's approach to combatting the issue.

Commitment: City Procurement will join forces with Finance and Internal Audit to continuously improve procurement procedures that reflect the City Corporation's own commitment to guarding against these issues. Service departments will be required to use the established approach.



Promoting responsible, green and social investment

Issue: Certain industries have inherently negative impacts, such as the fossil fuel industry on the natural environment and the tobacco industry on public health. Consequently, the Environment Agency Pension Fund, other large public sector pension funds and hundreds of others have joined forces and [committed](#) to taking action such as divesting from coal assets and oil & gas stocks.

There are an increasing number of start-ups and profitable businesses that operate for environmental and/ or social benefit. Supporting such businesses through finance helps to raise the corporate responsibility aspirations of entire sectors.

Regulations /City Policy: The City of London Pension Fund's [Statement of Investment Principles](#) is also applied to the other Funds managed by the City Corporation. Section 8, covering Environmental, Social and Governance aspects, describes the expectations of companies in terms of social responsibility and minimising environmental impacts.

Commitment: City Procurement will support service departments to encourage supply chain partners to mirror the City Corporation's commitment to responsible, green and social investment.



Policy	Specific Objective	Year 1	Year 2	Year 3
G: Ensuring human- and labour rights	Requiring contractors to demonstrate compliance with the UN's ILO conventions throughout the supply chain			
	Working towards ridding the City Corporation's supply chains of conflict minerals			
H: Ensuring legal and fair working practices	Eliminating modern slavery and human trafficking			
	Ensuring supply chain employees are working legally			
	Striving for fair remuneration up the supply chain			
I: Contracting with responsible businesses	Guarding against bribery, corruption and tax evasion			
	Promoting responsible, green and social investment			

Implementation timeline – main areas of focus over three years, Pillar 2: Ethical Sourcing

Corporate responsible procurement requirements according to threshold

Threshold	Policy	Requirement	Goods	Services	Works	Stage	Responsibility
All values	City of London Transport Policy	<ul style="list-style-type: none"> Officers must not purchase or lease diesel vehicles unless there is an absolute operational necessity <i>i.e. vehicles with no current alternative fuel options such as tractors, some vans and 4WD pickups.</i> Any individual procuring (including leasing or hiring) a vehicle on behalf of the City Corporation will be required to investigate alternative fuel options, especially full electric and petrol-hybrid. 	√			Pre-procurement	All individuals buying on behalf of the City Corporation, all departments.
	CoL Living Wage Procurement Policy 2015	All contractors and sub-contractors providing services on our premises; on property occupied by the City Corporation; and on land which it is responsible for maintaining, must pay all staff who work 2 or more hours a day for 8 or more consecutive weeks a year the (London) Living Wage.		√		Tender	Chamberlain's
	SPG for NRMM in LEZ	Any works involving non-road mobile machinery (NRMM) used for more than 30 days with net power between 37kW and 560kW is required to meet stage IIIB of EU Directive 97/68/EC (i.e. Euro IIIB).			√	PQQ/Ts & Cs	City Procurement/Comptroller's
< £10k	City of London (CoL) Procurement Code 2015	Officers are encouraged to seek quotations from either a UK based SME, a social enterprise, or a local supplier based in the square mile, the City fringe, one of the 10% most deprived London boroughs or other deprived boroughs according to their proximity to the City's asset (relevant to satellite sites).	√	√	√	Quotation	All individuals buying on behalf of the Corporation, all departments.
> £10k	CoL Procurement Code 2015	Officers must use the Government Buying Standards 'Mandatory' criteria for all relevant product categories, this includes sustainable wood products	√	√	√	Specification	Individual responsible for writing the specification
	This RP Strategy	Officers must ensure that all contractors self-declare that they recognise the International Labour Organisation (ILO) fundamental conventions and that they are working towards ensuring that their whole supply chain adheres to the principles set out in these conventions.	√	√	√	Contract Award	City Procurement/Comptrollers
£10k-£100k	City of London Procurement Code 2015	Officers must seek at least one quote from either a UK based SME, a social enterprise, or a local supplier based in the square mile, the City fringe, one of the 10% most deprived London boroughs or other deprived boroughs according to their proximity to the City's asset (relevant to satellite sites).	√	√		Quotation	Procurement Operations team
£10k-£400k					√		
> £100k	This RP Strategy	Officers must ensure that relevant suppliers have adhered to the requirements of the Modern Slavery Act 2015 including appropriate statements on their website.	√	√	√	Contract Award	City Procurement/Comptrollers
		When procuring cleaning and hygiene products, cosmetics, drugs, pesticides etc. action must be taken to identify products that have not been tested on animals.	√	√		Specification	Individual responsible for writing the specification.
> OJEU	City of London Procurement Code 2015	Officers should ensure that all public services contracts go to the Social Value Panel for consultation. Officers must factor in sufficient time into their procurement plans to undertake the consultation.		√		Pre-procurement	City Procurement
> £250k		A minimum of 10% of the weighting of technical (qualitative) element of the evaluation score, or a 5% flat rate where the percentage falls below 5% of the total score must be allocated to responsible procurement aspects in all tenders worth over £250k. Depending on the nature of the contract this may include questions related to objectives Bi, Bii, Ciii, or any within Policies E or F of this Strategy.	√	√	√	Supplier Evaluation	City Procurement/Department – collaboration
> £400k +all Corporate works contracts	A stand-alone DBE Policy	Contractors must register with the Fleet Operator Recognition Scheme (FORS) and will be encouraged to achieve Bronze accreditation before progressing to Silver and Gold accreditation status.		√	√	PQQ/Prelims/Ts & Cs	City Procurement/Comptroller's, advised on relevance by depts
	Port Health Committee Policy.	Relevant contractors will be made aware of and required to adhere to CoL's Noise Strategy and Policy		√	√	PQQ/Prelims/Ts & Cs or Contract award	City Procurement/Comptroller's, advised on relevance by depts
		Contractors are required to comply with the City Corporation's Code of Practice for Demolition and Construction and Code of Practice for the Minimisation of the Environmental Impact of Street works .			√		
	> £2m	Building and civil engineering contractors, and certain sub-contractors, will be required to join the City's Considerate Contractor Scheme .			√		
		Officers should consider presenting high value works contracts to the Social Value Panel for consultation.			√	Pre-procurement	City Procurement/Department
> OJEU	CoL Biodiversity Action Plan	Procurement leads within departments must ensure that contractors do not degrade existing biodiversity, must consider interventions to create habitats for target species.			√	Specification	Departments with support from DBE & OS

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Procurement Policy to support the City of London Air Quality Strategy 2015 - 2020

Introduction

- Air quality in the City does not meet health based targets, the problem pollutants are nitrogen dioxide (NO₂) and fine particles (PM₁₀). The main source is diesel vehicles
- The City of London Air Quality Strategy 2015 – 2020 was approved by PHES committee in July 2015. It is a statutory document. There is also a statutory duty to submit annual reports detailing progress with actions to both the GLA and Defra. This will include how we are encouraging the use of low and zero emission vehicles through our procurement policies
- There is increasing member interest in this issue, with a desire to implement something more substantial than has been happening to date. Improving air quality fits well with other corporate policies such as road danger reduction and increasing space for pedestrians
- Air quality has recently been escalated from a departmental risk to a Corporate Risk. The risk is both financial and health
- There is a lot of action underway to improve air quality, including proposals for an ultra-low emission zone in central London from 2020. However, more action is required to meet the targets in the Square Mile.
- Defra is consulting on a national air quality plan to be submitted to the European Commission following the instigation of infraction proceedings for non-compliance with air quality limits
- The City Corporation is taking a lead on air quality across London e.g. supporting research by Policy Exchange on further action required to meet air quality targets across London in shortest possible time
- Attached document details progress with air quality policies in the 2015 strategy

In line with Policy 7: Actions 43 and 44 of the City of London Air Quality Strategy:

- **From August 2015 the City of London commits to using petrol hybrid vehicles as part of any formal arrangement for taxi services.**
 - City procurement will specify that a significant proportion of the taxi fleet will be comprised of petrol hybrid vehicles (or better i.e. full electric) when forming any formal arrangement for taxi services.
 - The City of London currently have a formal arrangement with Addison Lee to provide some taxi services for the City already undertaken market research
 - Will formally re-evaluate the taxi service market every 12 months to assess whether or not conditions have become competitive enough to launch a tender exercise for a corporate taxi contract. City Procurement will look at whether the market has evolved enough in terms of the wider availability of vehicles that are capable of running in zero emission mode within the square mile.
 - Petrol hybrid taxis will be used by default by any established taxi service provider, providing that:
 - a hybrid vehicle is available within the required timing/ service level agreement - so that this policy will not affect service levels
 - a hybrid vehicle is available within a reasonable distance - so that this policy does not become self-defeating in terms of total air pollution
 - Staff requesting a vehicle that forms part of any formalised taxi service agreement will by default be provided a petrol hybrid vehicle, depending on availability, unless:
 - They have a specific, practical reason to request otherwise e.g. they need a 6-seater rather than a 4-seater vehicle
 - They have a written justification for specifying a different vehicle, signed off at Chief Officer level

- **The City of London's ultimate aim is to geo ring-fence the whole Square Mile**
 - From August 2015 hybrid taxis used under formal agreement with CoL were geo ring-fencing the areas of highest air pollution and/or sensitivity in the City
 - This means that all hybrid taxis will automatically switch from petrol to electric mode in these zones, provided that there is enough power in the battery.
 - As a pilot initiative, from August 1st 2015 this covers Cheapside (EC2), St. Pauls Churchyard and surrounding area (EC4M), Aldgate (EC3A) and St. Bart's Hospital (EC1A). the intention is to expand this depending on the success of the pilot.
 - We will continue to work with our contracted Courier service and use internal training and engagement to maximise the use of pedal bikes for courier services within the square mile.
 - The Corporation will explore the possibility of getting general deliveries into the City via electric vehicles where possible (see below).
- **Built Environment, supported by Environmental Health and City Procurement will explore opportunities for the consolidation of deliveries to CoL premises.**
- **In terms of construction, demolition and street works, from January 2016:**
 - All contracts that include street works should adhere to the requirements of the City of London [Code of practice](#) for minimising the environmental impact of street works
 - All contracts that include construction and or demolition should adhere to the requirements of the City of London [Code of Practice](#) for deconstruction and construction
 - All non-road mobile machinery (NRMM) used in the Square Mile for more than 30 days with net power between 37kW and 560kW is required to meet stage IIIB of EU Directive 97/68/EC (i.e. Euro IIIB). This is according to the Supplementary Planning Guidance ([SPG](#)) for NRMM Low Emission Zone.

In line with Policy 7: Action 46 of the City of London air Quality Strategy and with the City's Transport Policy, developed by the City of London's Transport Coordination Group (TGC):

- **From January 2016, any individual procuring (leasing or hiring) a vehicle on behalf of the City of London will be required to investigate alternative fuel options, especially full electric and petrol-hybrid.**
- **From January 2016 onwards, officers will not be able to purchase or lease diesel vehicles unless there is an absolute operational necessity** i.e. vehicles with no current alternative fuel options such as tractors, some vans and 4WD pickups.

Annex

Policy 7 (of 10) of the City of London Air Quality Strategy 2015 - 2020

Policy 7: Leading by example

The City Corporation will assess the impact of its activities on local levels of air pollution in the Square Mile and take steps to minimise it wherever possible.

Actions:

43. The City Corporation will continue to look for opportunities for reducing emissions from its buildings, fleet and contractors' fleet.

44. The City Corporation will ensure that major contracts include standards to reduce the impact on local air quality.

45. A pro forma air quality questionnaire will be developed for use in major policy reviews.

46. The City Corporation will move away from using diesel in its own fleet wherever practical.

Details of Actions associated with Policy 7:

Action	Detail	Timeline	Outcome
43. The City Corporation will continue to look for opportunities for reducing emissions from its buildings, fleet and contractors' fleet.	Continue to provide advice on the best vehicle option for new fleet purchases. Use contracts to push for cleaner vehicles in contractor's fleet. Manage buildings to reduce emissions of air pollutants, alongside carbon.	2015 -2020	Reduced impact of City Corporation activities on local air pollution.
44. The City Corporation will ensure that major contracts include standards to reduce impact on air quality.	Continue to ensure that all contracts require air quality targets. Integrate air quality into the new Responsible Procurement Strategy.	2015 - 2020	Reduced impact of City Corporation activities on local air pollution.
45. A pro forma air quality questionnaire will be developed for use in major policy reviews.	Develop the pro forma. Work with other departments to ensure it is embedded into their policies.	2016 - 2017	Corporate policies that assist in improving air quality and reducing exposure.
46. The City Corporation will move away from using diesel in its own fleet wherever practical.	All new purchases will be assessed and alternatives to diesel will be encouraged where available.	2015 - 2020	Reduced impact of City Corporation fleet on local air quality.

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Committee	Dated:
Port Health and Environmental Services Planning and Transportation Health and Wellbeing Board	19 July 2016 26 July 2016 16 September 2016
Subject: Report to Audit and Risk Management Committee on Air Quality	Public
Report of: Director of Markets and Consumer Protection	For Information
Report author: Ruth Calderwood Environmental Policy Officer, Port Health and Public Protection Service	

Summary

The City of London Corporation has identified eleven corporate risks, four of which are considered the most serious in terms of likelihood and impact, so are ranked as 'red'. Air quality is one of the four red corporate risks.

Five actions have been identified to demonstrate how the City Corporation is mitigating the risk associated with poor air quality:

- Implement policies in the City of London Air Quality Strategy
- Review and assess air quality in line with statutory obligations
- Become an Exemplar Borough for air quality
- Develop a communications strategy
- Develop and implement a plan for reducing the impact of diesel vehicles

The Audit and Risk Management Committee requested a deep dive review into how air quality is being handled by the City Corporation and the performance against the criteria which have been selected to demonstrate risk mitigation. The Committee was satisfied with the action being taken to address this issue and this report summarises the discussion held at the meeting. The deep dive report into air quality is available as background paper.

Recommendation

Members are asked to note the report.

Main Report

Background

1. The City of London Corporation has identified eleven corporate risks. Four of these are ranked as red risks, which are considered the most serious in terms of likelihood and impact. Air quality is one of the four red corporate risks.

2. The air quality risk is financial and reputational. There is also the potential for legal action against the City Corporation if it is considered that insufficient action has been taken to mitigate the problem, and the consequent impact on public health.
3. The European Commission has commenced infraction proceedings against the United Kingdom for its failure to take sufficient action to deal with the pollutant nitrogen dioxide. This could lead to fines of £300million per annum. The Localism Act 2012 enables part of the fine to be passed to local authorities if it can be demonstrated that they have not taken appropriate action.
4. A recent report in the Sunday Times and on the BBC radio 4 Today programme detailed the case of a woman who is preparing to sue the Mayor of London and Lewisham Borough Council for failing to take sufficient action to improve air quality which she believes may have contributed to her daughter's death from asthma. Her lawyers are gathering clients for a potential class action.
5. The Audit and Risk Management Committee requested a deep dive review into how air quality is being handled across the City Corporation and the performance against the criteria which have been selected to demonstrate risk mitigation.

Air quality deep dive report

6. The Director of Markets and Consumer Protection presented the air quality deep dive report to the Audit and Risk Management Committee at their meeting on 14 June 2016. The report is available as a background paper via the [Audit & Risk Management Committee webpage](#).
7. The Director outlined that the City Corporation has an effective, proactive Air Quality Strategy that addresses the issue over and above statutory requirements. He also highlighted that the City Corporation is highly regarded by all stakeholders and that there is strong support from Members, residents and businesses to tackle the issue.
8. The Director detailed the importance that the recently elected Mayor of London has placed on improving air quality and that the City Corporation will continue to support the Mayor and play a major role in developing and implementing effective air quality policy across the Capital. It was noted that the Mayor of London had chosen to make his announcements on air quality at Sir John Cass Primary school. This was due to the air quality work undertaken with the school by the City Corporation.
9. The need for continued, effective cross-departmental collaboration was stressed and it is necessary for the issue to be tackled at all levels throughout the City Corporation.
10. An oral update was provided on a number of key initiatives. This included progress with aspects of the actions below that were chosen to demonstrate risk mitigation in this area:

- Implement policies in the City of London Air Quality Strategy
- Review and assess air quality in line with statutory obligations
- Become an Exemplar Borough for air quality
- Develop a communications strategy
- Develop and implement a plan for reducing the impact of diesel vehicles

11. The Chairman and Members thanked officers for an excellent, insightful report and for the productive debate which it facilitated.

Corporate & Strategic Implications

12. The work on air quality supports Key Policy Priority KPP3 of the Corporate Plan: 'Engaging with London and national government on key issues of concern to our communities such as transport, housing and public health'.

Conclusion

13. The City Corporation is taking a wide range of actions to deal with air pollution and its effect on health. The Audit and risk Management Committee was satisfied with the measures being taken to address the associated risks.

Background Papers – Report of the Director of Markets and Consumer Protection to the Audit and Risk management Committee - Air Quality Deep Dive

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Committee(s)	Dated:
Port Health and Environmental Services – for decision	19 July 2016
Planning and Transportation – for information	26 July 2016
Health and Wellbeing Board – for information	16 September 2016
Subject: Draft City of London Noise Strategy 2016 – 2026	Public
Report of: Director of Markets and Consumer Protection	For Decision
Report author: Rachel Sambells, Pollution Team Manager	

Summary

The City of London Corporation published its first Noise Strategy in 2012. The Strategy, approved by the Port Health and Environmental Services Committee on 1st May 2012, expires in 2016.

A draft Noise Strategy for 2016 to 2026 has been produced and is appended to this report. It contains 59 actions grouped into 5 key work areas to manage and minimise exposure to excessive noise whilst striving to enhance the quality of the acoustic environment and soundscape of the City of London.

The draft Noise Strategy will help ensure that the City Corporation fulfil its statutory obligations for managing and minimising exposure to excessive noise. It also reflects the priority placed on the effects of reducing the impact of unwanted sound and the provision of areas of respite from the noisy urban environment on the health of residents, workers and visitors as detailed in the City and Hackney Joint Strategic Needs Assessment.

Recommendation(s)

I recommend that your Committee approves the proposal set out in paragraph 12 that the attached draft Noise Strategy (Appendix 1) undergo external consultation until 17th October 2016, subject to any comments received at your meeting and a further report will be presented to your 24th January 2017 meeting to approve the subsequent new strategy.

Main Report

Background

- Noise can have short and long term effects on health e.g. annoyance, sleep disturbance, interruption of speech and social interaction, disturbance of concentration (affecting learning and long-term memory), and hormonal and cardiovascular effects.

2. The City Corporation has a statutory responsibility to manage and minimise exposure to excessive and sometimes unnecessary noise, whilst ensuring that the City can continue to function as a modern world-class business centre.
3. In 2012, the City of London produced an innovative Strategy outlining its approach to fulfilling its statutory obligation to manage and mitigate excessive noise and made recommendations for improving the way that the City controls noise and made proposals for protecting and enhancing areas of relative tranquillity.
4. The strategy considered four key areas: mitigating noise from new developments, reducing noise from transport, servicing and street works, dealing with noise complaints and incidents and protecting and enhancing tranquil areas reflecting the concerns of residents, workers and visitors to the City of London.
5. The strategy balanced the needs of the Business City (particularly construction sites) and the City Corporation to undertake noisy works, with the expectations of residents and neighbouring businesses who wish for disturbance to be minimised. In particular, City Corporation officers gave consideration to balancing the authority's statutory noise responsibilities and traffic management needs in relation to minimising disruption from streetworks and the extent to which City night time activities, such as deliveries, refuse collection and street cleansing have been facilitated.
6. An update on the actions of the Noise Strategy 2012 to 2016 was presented to your committee on the 19 June 2015 and a further update on these actions is included as an appendix to the refreshed draft Noise Strategy 2016 – 2026.

Key Policies and Proposals

7. The City of London draft Noise Strategy brings together and updates policies and programmes that are already in place to manage and mitigate noise. In particular, the draft Noise Strategy will help deliver one of the key themes of the Local Plan to “protect, promote and enhance our environment” whilst contributing to the wider policy context of maintaining a world class city that supports our diverse communities and remains vibrant and culturally rich.
8. There are 59 actions contained within the strategy that are divided into the following five key policy areas:
 - Background and evidence base
 - New developments
 - Transport and streetworks
 - Dealing with noise complaints and incidents
 - Protecting and enhancing the acoustic environment and soundscape.

9. The draft Noise Strategy encourages a new approach to the management of “soundscape” (the aural equivalent of “landscape”) in outdoor spaces and hybrid indoor-outdoor places in the City. The Strategy outlines support for measures to promote iconic sounds, lost and disappearing sounds, wanted sounds, added sounds, sound walks, and sound art installations. We will also continue our ongoing initiative regarding the identification of relatively tranquil areas in the City and the development of policies to protect and enhance these spaces. We will be seeking opportunities to encourage both new and existing partners to support soundscape initiatives.
10. The Strategy reflects the concerns of residents, workers and visitors to the City who have previously been interviewed and consulted about the City’s acoustic environment. We will continue to seek feedback and hope to undertake a further survey to monitor the success of the measures we are taking. It is our intention that the policies and actions proposed will help to ensure that the City Corporation fulfils its statutory obligations for noise management, as well as seeking to improve the health and well-being of the City’s residential and business communities.
11. This revised draft Strategy ensures that the City of London’s approach continues to be suitable and appropriate for a world class City.

Proposals

12. I propose that, subject to comments received at your meeting, the attached draft Noise Strategy is published for consultation until 17 October 2016. A further report will be presented to your 24 January 2017 meeting to approve the new strategy.

Financial Implications

13. Work related to ‘Dealing with noise complaints and incidents’ contained within the strategy will be funded using existing resources from within the Port Health and Public Protection Service. Assistance will be required to implement actions relating to ‘new developments’ and ‘Transport and Streetworks’ from the Department of Open Spaces and the Department of the Built Environment (DBE).
14. Opportunities for collaboration, funding and grants will be sought for project work and to encourage both new and existing partners to support soundscape initiatives to fulfil the actions in Chapter 5, ‘Protecting and enhancing the acoustic environment and soundscape’.

Corporate and Strategic Implications

15. The work on noise sits within Strategic Aims 1 and 2 (SA1) (SA2) and of the Corporate Plan: ‘To support and promote The City as the world leader in international finance and business services’ and ‘To provide modern, efficient and high quality local services, including policing, within the Square Mile for workers, residents and visitors’..

Consultees

16. Consultation has been carried out internally (Open Spaces, Department of the Built Environment, Town Clerks and Comptrollers) and the results of this have been considered in this draft.
17. The strategy will undergo full external consultation e.g. Residents, businesses, City stakeholder groups and neighbouring boroughs until the 17 October 2016 and consultation comments will be incorporated into the final strategy where appropriate.

Conclusion

18. The City Corporation has produced a refreshed and updated Noise Strategy to meet the statutory responsibility to manage and minimise noise exposure to excessive noise, whilst ensuring the City can continue to function as a modern world class business centre. Subject to comments received at your meeting, the Noise Strategy will be published for public consultation until 17 October 2016.

Background Papers:

The City of London Noise Strategy 2012 to 2016
Report on Enhanced Working Hours for Street works in the City - Port Health and Environmental Services Committee November 13 2102
Report on Mitigation of Environmental Impacts from Developments - Port Health and Environmental Services Committee April 30 2013
Report on Noise Service Delivery Policy/Noise Complaint Policy - Port Health and Environmental Services Committee July 2 2013
Report on Port Health and Public Protection Out of Hours Noise Service - Port Health and Environmental Services Committee March 1 2014
Report on Noise Strategy Update of Actions Port Health and Environmental Services Committee 19 June 2015

Appendix:

The City of London Draft Noise Strategy 2016 – 2026 – available [online](#) and via hard copy in the Members' Reading Room

Contact:

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Committee(s)	Dated:
Port Health & Environmental Services Committee	19 July 2016
Subject: Port Heath Offices – Land & Premises, Riverside Road, Charlton, London, SE7 7SU – Renewal of Lease	Public
Report of: Director of Markets and Consumer Protection	For Decision
Report author: Gavin Stedman, Assistant Director Port Health Service	

Summary

The Port Health offices at Riverside, Charlton are currently occupied under a tenancy at will following the expiry of a lease in December 2015. Terms for a new lease have provisionally been agreed with the City's landlord, Riverside Resource Recovery Limited, subject to completion of internal due diligence which is likely to complete in the next few weeks. It will then be possible to complete a new lease subject to your Committee's authority .

Recommendation(s)

It is recommended that authority be delegated to the Town Clerk in consultation with the Chairman and Deputy Chairman of the Port Health and Environmental Services Committee, and the City Surveyor, to consider the terms for a new lease of the Port Health offices at Riverside, Charlton.

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Committee(s):	Date(s):
Port Health & Environmental Services Committee	19 July 2016
Subject: Food Standards Agency Audit 2015	Public
Report of: Director of Markets & Consumer Protection	For Information
Report author: Peter Brett, Commercial Team (West) Manager	

Summary

This report provides a summary of the response made to the findings of an audit of the City of London Corporation's Food Safety service by the Food Standards Agency (FSA).

The Food Safety service was found to be:-

- a) delivering a range of food law enforcement activities in accordance with our statutory obligations; these were generally delivered according to prescribed timescales by experienced, professional staff; and
- b) demonstrating consistently high performance with regard to meeting planned inspection targets of food businesses; and

with only two key recommendations for improvement:-

- a) **Food premises interventions:** interventions and inspections needed to be recorded in sufficient and consistent detail to demonstrate businesses had been fully assessed to against legally prescribed standards; and
- b) **Internal Monitoring:** whilst some qualitative monitoring checks were being carried out, there was a need to further develop these across the full range of food related activities undertaken and to maintain fuller records of our internal monitoring.

Recommendations

I recommend that your Committee notes the content of this report, the FSA Audit and our Action Plan.

Main Report

Background

2. The FSA audit scheme is designed to maintain and improve consumer protection and confidence by ensuring that local authorities are providing an effective Food Safety service.

3. These arrangements recognise that the enforcement of UK food law relating to food safety, hygiene, composition, labelling, imported food and feeding stuffs is largely the responsibility of local authorities.
4. The City Corporation was included in the FSA's 2015-16 programme of audits because we had not had its City Food Safety service audited in the past by them.
5. At the time of the audit the Port Health & Public Protection Service had just reorganised its Public Protection Division and the team delivering official food controls following the Service-Based Review. Two Commercial Teams, West and East, had been created, responsible for enforcing legal requirements relating to:-
 - a) Food Safety (standards and hygiene);
 - b) Occupational Health & Safety;
 - c) Statutory Nuisances (other than noise); and
 - d) the investigation Infectious Diseases arising from commercial activities – e.g. suspected food poisoning cases.

Scope of the Audit

6. The audit took place over three days between 30 November and 2 December 2015 and examined the City Corporation's Food Law Service Delivery and Food Business Compliance.
7. The assessment involved:-
 - a) auditing the local arrangements in place for database management, inspections of food businesses and internal monitoring;
 - b) an onsite check at a food business accompanying an officer to assess the effectiveness of the official controls implemented by the City Corporation and, more specifically, the checks carried out by our officers to verify Food Business Operators' (FBO) compliance with legislative requirements; and
 - c) an assessment of the City Corporation's overall organisation and management and the internal monitoring of food law enforcement activities.

Audit Findings

8. The Service was found to be:
 - a) delivering a range of food law enforcement activities in accordance with our statutory obligations; these were generally delivered according to prescribed timescales by experienced, professional staff; and
 - b) demonstrating consistently high performance with regard to meeting planned inspection targets of food businesses.
9. Overall, the City Corporation ranks very well when the audit results are compared with those of undertaken at other local authorities.

The Audit Recommendations

10. Some improvements were required to enable the City Corporation to attain the full level of protection to consumers and in order to meet the statutory requirements of the Framework Agreement and the Food Law Code of Practice.
11. These key areas for improvement were
 - a) **Food premises interventions:** interventions and inspections needed to be recorded in sufficient and consistent detail to demonstrate businesses had been fully assessed to against legally prescribed standards; and
 - b) **Internal Monitoring:** whilst some qualitative monitoring checks were being carried out, there was a need to further develop these across the full range of food related activities undertaken and to maintain fuller records of our internal monitoring.
12. As part of the audit process, the City Corporation was required to draft an Action Plan in response to the audit findings. This Action Plan, which was approved by the FSA, is included in the Audit report (Appendix 1) that was subsequently published on the [FSA's website](#).

Current Position

13. Actions continue to be taken to manage the recommendations made in the Audit report and to complete the work in our Action Plan.
14. The FSA's position is to:-

"...contact your authority again in six months to review your progress against the action plan attached at the end of the audit".

as stated in their letter to the Town Clerk of 23 February 2016.

Corporate and Strategic Implications

15. If the City Corporation had 'failed' the Audit, depending upon the severity of the non-compliance, the FSA has the power to take over a local authority's Food Safety service with the subsequent reputational risk being realised.

Other Implications

16. There are no other implications that would result from approval of this report.

Proposals

17. It is recommended that your Committee notes the content of this report.

Conclusion

18. The City Corporation was found to be delivering a range of food law enforcement activities in accordance with our statutory obligations, within prescribed timescales, by experienced, professional staff and demonstrated consistently high performance with regard to meeting our planned inspection targets of food businesses.
19. Two areas were identified for improvement and these are being addressed through a published Action Plan.

Appendices:

Appendix 1 Food Standards Agency Audit Report incorporating our Action Plan

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Report on the Audit of Food Law Service Delivery and Food Business Compliance

Foreword

Audits of local authorities' feed and food law enforcement services are part of the Food Standards Agency's arrangements to improve consumer protection and confidence in relation to food and feed. These arrangements recognise that the enforcement of UK food and feed law relating to food safety, hygiene, composition, labelling, imported food and feeding stuffs is largely the responsibility of local authorities. These local authority regulatory functions are principally delivered through their Environmental Health and Trading Standards Services.

The attached audit report examines the Local Authority's Food Law Enforcement Service. The assessment includes the local arrangements in place for database management, inspections of food businesses and internal monitoring. It should be acknowledged that there will be considerable diversity in the way and manner in which local authorities may provide their food enforcement services reflecting local needs and priorities.

Agency audits assess local authorities' conformance against the Food Law Enforcement Standard ("The Standard"), which was published by the Agency as part of the Framework Agreement on Official Feed and Food Controls by Local Authorities and is available on the Agency's website at:
www.food.gov.uk/enforcement/auditandmonitoring.

The main aim of the audit scheme is to maintain and improve consumer protection and confidence by ensuring that local authorities are providing an effective food law enforcement service. The scheme also provides the opportunity to identify and disseminate good practice and provide information to inform Agency policy on food safety, standards and feeding stuffs. Parallel local authority audit schemes are implemented by the Agency in Wales and Northern Ireland.

The report contains some statistical data, for example on the number of food premises inspections carried out annually. The Agency's website contains enforcement activity data for local authorities and can be found at:
www.food.gov.uk/enforcement/auditandmonitoring.

For assistance, a glossary of technical terms used within the audit report can be found at Annex C.

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1.0 Introduction

- 1.1 This report records the results of an audit at the City of London Corporation with regard to food hygiene enforcement, under relevant headings of the Food Standards Agency Food Law Enforcement Standard. The audit focused on the Authority's arrangements for the management of the food premises database, food premises interventions, and internal monitoring. The report has been made publicly available on the Agency's website at:

www.food.gov.uk/enforcement/auditandmonitoring/auditreports.

Hard copies are available from the Food Standards Agency's Operations Assurance Division at Aviation House, 125 Kingsway, London WC2B 6NH, Tel: 020 7276 8428.

Reason for the Audit

- 1.2 The power to set standards, monitor and audit local authority food law enforcement services was conferred on the Food Standards Agency by the Food Standards Act 1999 and the Official Feed and Food Controls (England) Regulations 2009. This audit of the City of London Corporation was undertaken under section 12(4) of the Act as part of the Food Standards Agency's annual audit programme.
- 1.3 Regulation (EC) No. 882/2004 on official controls performed to ensure the verification of compliance with feed and food law, includes a requirement for competent authorities to carry out internal audits or to have external audits carried out. The purpose of these audits is to verify whether official controls relating to feed and food law are effectively implemented. To fulfil this requirement, the Food Standards Agency, as the central competent authority for feed and food law in the UK has established external audit arrangements. In developing these, the Agency has taken account of the European Commission guidance on how such audits should be conducted.¹
- 1.4 The Authority was included in the Food Standards Agency's programme of audits of local authority food law enforcement services, because it had not been audited in the past by the Agency.

¹ Commission Decision of 29 September 2006 setting out the guidelines laying down criteria for the conduct of audits under Regulation (EC) No. 882/2004 of the European Parliament and of the Council on official controls to verify compliance with feed and food law, animal health and animal welfare rules (2006/677/EC)

Scope of the Audit

- 1.5 The audit examined the City of London Corporation's arrangements for food premises database management, food premises interventions and internal monitoring, with regard to food hygiene law enforcement. This included a reality check at a food business to assess the effectiveness of official controls implemented by the Authority at the food business premises and, more specifically, the checks carried out by the Authority's officers to verify food business operator (FBO) compliance with legislative requirements. The scope of the audit also included an assessment of the Authority's overall organisation and management, and the internal monitoring of other related food hygiene law enforcement activities.
- 1.6 Assurance was sought that key authority food hygiene law enforcement systems and arrangements were effective in supporting business compliance, and that local enforcement was managed and delivered effectively. The on-site element of the audit took place at the Authority's office at Walbrook Wharf, 79 – 83 Upper Thames Street, London, EC4R 3TD on 30th November – 2nd December 2015.

Background

- 1.7 The City of London Corporation delivers official food controls in a unique area. The area is often referred to as the Square Mile as it is 1.12 square miles in area. The Port Health and Public Protection Department are located at offices in Walbrook Wharf which are also shared by the City's Police Force. The City of London is a major financial centre and there are approximately 392,400 people employed in the area, largely in the 251 international banks that are located there.
- 1.8 The Authority had a varied range of establishments within its area including Smithfield Market which has a typical throughput of 100, 000 tonnes of meat and allied products each year. Approximately 86% of the 1839 food businesses on the Authority's food premises database in 2015 were classified as restaurants and caterers including takeaways. The Authority did not have any food manufacturing businesses requiring approval under Regulation (EC) No. 853/2004 and those located at Smithfield fell to enforcement by the FSA with regard to food hygiene.
- 1.9 At the time of the audit the authority had just reorganised the teams delivering official food controls following an Authority-wide Service-Based Review, and two Commercial Teams had been created, responsible for enforcing legal requirements relating to food safety (standards and hygiene), occupational health & safety, statutory nuisances (other than noise) and the investigation infectious diseases arising from commercial activities. The Commercial Teams were also responsible for delivering

food standards and health & safety interventions at Smithfield Market and ensuring food hygiene is maintained in vehicles transporting product from the market. The teams also oversaw the processing and disposal of animal by-products produced on the market to prevent them from re-entering the human food chain. Prior to this change a Food Safety Team and a Smithfield Enforcement Team had been responsible for official food controls; it was this former structure that was outlined in the Food Service Plan for 2015-16. The Feedstuffs enforcement function in the City was carried out by the Trading Standards Team.

- 1.10 The profile of The City of London Corporation's food businesses as at 31st March 2015 was as follows:

Type of Food Premises	Number
Primary Producers	0
Manufacturers/Packers (food standards)	45
Importers/Exporters	0
Distributors/Transporters	8
Retailers	201
Restaurant/Caterers	1585
Total Number of Food Premises	1839

2.0 Executive Summary

2.1 The Authority was selected for audit as it had not previously been audited by the Agency. The Authority was found to be delivering a range of food law enforcement activities in accordance with the statutory obligations placed on the Authority as a competent food authority. These were generally delivered according to prescribed timescales by experienced professional staff. However, some improvements were identified to enable the Service to attain the required level of protection to consumers and in order to meet the statutory requirements of the Framework Agreement and the Food Law Code of Practice (FLCoP). A summary of the main findings and key improvements necessary is set out below.

2.2 **Strengths:** The Authority demonstrated consistent high performance with regard to meeting planned inspection targets of food businesses due an intervention.

2.3 **Key area for improvement:**

Food premises interventions: Interventions/inspections needed to be recorded in sufficient and consistent detail to demonstrate establishments have been fully assessed to the legally prescribed standards.

Internal Monitoring: Discussions indicated that whilst some qualitative monitoring checks were being carried out it was recognised there is a need to further develop these across the full range of food related activities undertaken. In addition complete records of internal monitoring activities should be maintained.

3.0 Audit Findings

3.1 Organisation and Management

Strategic Framework, Policy and Service Planning

- 3.1.1 At the City of London Corporation, official food controls were delivered by two Commercial Teams and the Port Health Service acting as the London Port Health Authority (LPHA). All were part of the Port Health & Public Protection Service (PH&PP) which was part of the Department of Markets & Consumer Protection (M&CP). The audit focused primarily on the work of the former Food Safety Team.
- 3.1.2 The Authority had developed a documented Food Service Plan for 2015-2016 which had been given Elected Member approval. The Plan was linked to corporate objectives in the Business Plan for the Port Health and Public Protection Team 2015-2018. The aims and objectives for the team were to:
- *protect public health from risks which may arise in connection with the consumption of food, including risks caused by the way in which it is produced or supplied and otherwise;*
 - *protect the interests of consumers in relation to food so that all food sold is as described and is labelled correctly*
- 3.1.3 The Plan highlighted key achievements and projected work streams. Performance against targets was demonstrated in the overall Business Plan. The service plan was supplemented by comprehensive performance reviews at least three times a year which included challenges to the service, overriding issues and updates of performance indicators.
- 3.1.4 The Plan was generally well structured and broadly followed the Service Planning Guidance in the Framework Agreement. It clearly set out the financial resource available for the service and the staffing resources, expressed in terms of hours, required to meet all the statutory demands on the service.
- 3.1.5 The Service Plan for 2015-2016 indicated that there were 7.7 full time equivalent staff dedicated to the delivery of official food controls. Analysis of Local Authority Enforcement Monitoring System (LAEMS) data showed that there had been an approximate 6.5% reduction in staff engaged in food hygiene between 2013-2014 and 2014-2015 due to restructure of the service.
- 3.1.6 At the time of the audit some roles and responsibilities were still being refined following the main service review. As part of a previous review in 2013-14, the Food Safety Team had also acquired additional interventions

formerly dealt with by The Port Health Service, which resulted in the transfer of some 125 additional premises (primarily river-based tourists vessels), to the planned inspection programme.

Documented Policies and Procedures

- 3.1.7 The Authority had developed a range of documented procedures and work instructions for its food law enforcement service; these were reviewed by the Lead Food Officer.
- 3.1.8 The inclusion of document version numbers provided an element of document control, but there was no comprehensive review process to ensure that policies and procedures are up to date and accurately reflect changes in legislation and guidance. The review provisions should indicate who is responsible for carrying out the review and at what frequency.

Recommendation(s)

3.1.9 The Authority should:

Set up, maintain and implement a control system for all documentation relating to its enforcement activities. [The Standard – 4.2]

Officer Authorisations

- 3.1.10 The Authority had developed a documented procedure for the authorisation of officers. The procedure had been proactively reviewed against the latest version of the Food Law Code of Practice (FLCoP), issued on the 7th April 2015 although some areas needed further detail.
- 3.1.11 Authorisation and training records for four officers engaged in delivering official controls were checked including the Lead Food Officer. Officers were all authorised generically and whilst authorisation documents did reference the majority of legislation, key references were absent including; Official Food and Feed Control Regulations 2009, Food Safety and Hygiene (England) Regulations 2013 and the Trade in Animal Related Products Regulations 2011. Auditors advised that the LA should authorise specifically under these Regulations as they contain direct enforcement powers. Furthermore specific authorisation could then be tailored as appropriate in the event that an officer did not meet the competencies required to undertake all official controls or enforcement sanctions.

- 3.1.12 Auditors were advised that officer competence was assessed and monitored through the Authority's formal performance and development appraisal system and mapping against the Regulators Development Needs Assessment Tool (RDNA). Summary evidence was provided for one officer that showed completion of the process and training needs identified as a result.
- 3.1.13 Qualification and training records for four officers were examined and these demonstrated that officers were receiving the minimum 10 hours relevant training per annum based on the principles of continuing professional development. Some evidence was provided of formal enforcement and specialist technical training.

Recommendation(s)

3.1.14 The Authority should:

Set up, maintain and implement a documented procedure for the authorisation of officers based on their competence and in accordance with the relevant Codes of Practice and any centrally issued guidance. [The Standard – 5.1]

3.2 Food Premises Database

- 3.2.1 The Authority was operating a database capable of providing accurate monitoring returns to the agency. During the onsite phase of the audit and at short notice the LA was asked to provide auditors with a range of reports. These were found to be consistent with LAEMS data previously supplied.
- 3.2.2 The Authority had the benefit of dedicated systems support. The Operational Support Team Manager and his team had exclusive access rights to update premises records in terms of opening and closure of business premises. Individual officer access was password controlled.
- 3.2.3 Auditors were informed that to ensure that the database was reflective of the premises in the district it was regularly updated based upon information received during the Licensing, Planning and Building Regulation process. Evidence showed that the Food Safety Team were a consultee as part of the application process for licensing and appropriate planning applications. The LA also relied on the local knowledge of

officers to identify new food premises coupled with the consultation process above.

- 3.2.4 Prior to the on-site phase auditors had been advised by the Food Hygiene Ratings Team that there were some potential anomalies and inaccuracies in data that the authority had uploaded to the Food Hygiene Rating Scheme (FHRS), Portal. A report on the areas for attention had been provided to the Authority for further investigation. It was noted that some of these anomalies arose through character limitations in certain fields (Trader Name) of the LA's database and largely caused by the size of some City buildings across multiple street addresses.
- 3.2.5 Evidence from the audit did confirm that the database appeared to be consistent with LAEMS data supplied and moreover showed continued high performance with regard to meeting inspection targets.

3.3 Food Premises Interventions

- 3.3.1 The LA had a reviewed intervention and inspection procedure that broadly followed the guidance within the FLCoP. File checks demonstrated that inspections were generally carried out at appropriate intervals.
- 3.3.2 Auditors examined five general premises files and the records relating to the most recent and preceding inspections. The premises files were selected across a range of risk category A – D premises and included interventions carried out by a range of authorised officers.
- 3.3.3 The LA had adopted a comprehensive aide memoire which officers were required to complete after each inspection. In all files examined, however, there was insufficient level of detail recorded about the size, scale and nature of the business and the type of food operations carried out.
- 3.3.4 In four out of the five files there was not enough information recorded to justify how compliance was assessed overall or how the risk scores were allocated based upon compliance as well as non-compliance. Auditors discussed the need to maintain accurate and detailed inspection records. These would provide officers with an enforcement history and would enable them to undertake a consistent and appropriate graduated enforcement approach. They would also inform and support the risk rating given to a food premises.
- 3.3.5 Following a scheduled food hygiene inspection written findings were always provided to the Food Business Operator (FBO). This correspondence contained detailed advice for food businesses, clearly

differentiating between contraventions and recommendations of good practice with appropriate timescales for compliance.

- 3.3.6 There was evidence of appropriate revisits being carried out in most cases to check business compliance. However auditors discussed the need to generally record more detail in relation to revisit finding outcomes as the LA was not able to provide in all cases evidence of when an officer had secured compliance with regard to significant areas of concern.

Recommendation(s)

3.3.7 The Authority should:

Ensure that inspections/interventions are recorded in sufficient detail to demonstrate establishments have been fully assessed to the legally prescribed standards, the Food Law Code of Practice and centrally issued guidance. [The Standard - 7.2 and 7.3]

Verification visit to a Food Premises

- 3.3.8 During the audit, a verification visit was undertaken to a restaurant / take away with an officer from the Authority, who had carried out the last food hygiene inspection of the premises. The main objective of the visit was to assess the effectiveness of the Authority's assessment of food business compliance with food law requirements.
- 3.3.9 During the visit the officer was able to demonstrate familiarity with the premises and a good and effective working relationship with the FBO. The officer had effectively identified the structural issues and key operations at the businesses and the advice given at the last inspection had resulted in valuable improvements being made.

3.4 Enforcement

- 3.4.1 The Authority had developed a documented Food Safety Enforcement and Prosecution Policy which was dated September 2014. The policy had been developed in accordance with centrally issued guidance and had been endorsed by elected members. Good use of flow charts was noted in enforcement procedures that gave officers clear unambiguous instruction in an easy to follow format.
- 3.4.2 File record checks were carried out in regard to food hygiene improvement notices, hygiene emergency prohibition notices, voluntary

closure and certification of food under regulation 29. The LA had not undertaken any prosecutions in the 2 years prior to the audit.

- 3.4.3 All enforcement actions were found to be appropriate to the circumstances found and in general followed due legal process. Good evidence was found of the use of photographs to support enforcement action taken. However auditors were unable to find sufficient information in all cases to show outcomes of formal enforcement monitoring visits. Also in relation to the destruction of food after the service of regulation 29 notices there were no records to indicate whether food was disfigured to prevent it re-entering the food chain prior to disposal by the FBO.

3.5 Internal Monitoring

- 3.5.1 The Authority needed to develop and implement a documented internal monitoring procedure that covered all areas of the service in particular the enforcement decisions and follow up actions relating to poor performing businesses, the allocation of risk scores and associated food hygiene ratings. This documentation process should also include details of corrective actions taken as a result of monitoring.
- 3.5.2 Evidence was obtained for documented monitoring only when officers served hygiene improvement notices. This took the form of a notice check sheet that ensured that formal enforcement notices were peer reviewed for inaccuracies and adherence with the Enforcement Policy. Auditors agreed that this was an example of effective monitoring.
- 3.5.3 Quantitative monitoring was carried out in relation to response times and inspection targets. This was facilitated through the use of the LA database system reporting process. The type of database system used did allow officers and the Lead Food Officer to easily analyse when and if an inspection had been completed, what interventions were overdue or had outstanding actions associated with them.
- 3.5.4 Auditors were informed that accompanied inspections with officers and desktop reviews of performance were carried out, however records were not maintained. Auditors were also advised by the Lead Food Officer that qualitative monitoring was carried out during one to ones and staff appraisals. Whilst individual officer interventions may have been discussed during these meetings there was no evidence available to determine what was discussed and more importantly occasions when the Lead Food Officer had implemented a corrective action or identified a training or development need.

Recommendation(s)

3.5.5 The Authority should:

- (i) Further develop and implement its documented internal monitoring procedures in accordance with Article 8 of Regulation (EC) No. 882/2004, the Food Law Code of Practice and centrally issued guidance to include reviews of inspection records and risk scoring and follow up enforcement actions. [The Standard-19.1]
- (ii) Verify its conformance with the standard, relevant legislation the relevant Codes of Practice, centrally issued guidance and the Authority's own documented policies and procedures. [The Standard-19.2]
- (iii) Keep a record of all internal monitoring in particular record deviations and corrective actions. Records should be kept for at least 2 years. [The Standard-19.3]

Food and Food Premises Complaints

- 3.5.6 The LA had developed a documented food complaints policy and procedure. This included a helpful flow chart that gave advice to the investigating officer on steps to be observed such as advising the FSA of a possible incident.
- 3.5.7 Audit checks on five file records of food and food premises complaint investigations found that generally appropriate investigations and follow up actions had been carried out.
- 3.5.8 Officers had responded expediently to the type of complaint and carried out initial visits in good time where appropriate.

Food Inspection and Sampling

- 3.5.9 The Authority had developed a policy statement that set out the intended sampling plan for 2014/15. The authority participated in FSA and PHE sampling programmes and also frequently used sampling as a tool to inform and support enforcement and/or interventions. Sampling was further directed by participation in the London Food Coordinating Group.

- 3.5.10 Evidence was provided to demonstrate that the FBO was informed of sampling results as appropriate.
- 3.5.11 Auditors did discuss with the LA improvements to the level of detail recorded when carrying out interventions following sampling. Whilst basic details of visit dates were recorded auditors could not find information in all instances as to why sampling had been carried out, what checks had been made on non-compliances that may have caused the unsatisfactory sample result or the advice that had been given to the FBO in such circumstances.

Records

- 3.5.13 Records were maintained in electronic and hard copy format. Records were retrievable and found to be mostly well organised.

Third Party or Peer Review

- 3.5.15 The Authority had not participated in an inter authority audit or peer review process in the two years prior to the audit.
- 3.5.16 A report to the Port Health & Environmental Services Committee in July 2015 included benchmarking evidence on a variety of Environmental Health functions, including Food Safety. This was collected from neighbouring London Local Authorities and was used to inform the subsequent Service-Based Review

Auditors: Jamie Tomlinson
Christina Walder

Supporting Officer: Rachel Corry

Food Standards Agency
Operations Assurance Division

ANNEX A - Action Plan for City of London Corporation

Audit date: 30 November– 2 December 2015

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.1.9 Set up, maintain and implement a control system for all documentation relating to its enforcement activities. [The Standard – 4.2]	30/09/2016	<ul style="list-style-type: none"> Further consider the existing systems for document control including the storage and referencing of procedures and other documentation; following structural changes in service delivery that are due to commence fully on 1st April 2016, this will need to be considered across the 'Commercial board'. 	<ul style="list-style-type: none"> Individual Food procedures had already been reviewed in preparation for the structural changes and to reflect the current Food Law Code
3.1.14 Set up, maintain and implement a documented procedure for the authorisation of officers based on their competence and in accordance with the relevant Codes of Practice and any centrally issued guidance. [The Standard – 5.1]	30/04/2016	<ul style="list-style-type: none"> Review the current procedure in light of the Auditors comments, enhance and sign off the requisite procedure for authorising Authorised Officers. Ensure that line managers with responsibility for Authorised Officers meet the necessary competency requirements of the code (in their capacity as lead officers) following structural changes in service delivery that are due to commence fully on 1st April 2016. Ensure that the Authority's existing Performance and Development Framework (that already utilises the RDNA) includes the necessary assessment and development of competences required in the Food Law Code and that this is signed off appropriately. This will be completed within the Authority's 2016-17 appraisal cycle and in time for the Code revision on competency (effective April 2016). Add the key enforcement references (3.1.11 of the audit report) in Officers' authorisations. 	<ul style="list-style-type: none"> The existing procedure for authorising Authorised Officers had been reviewed prior to the audit to reflect changes in the Food Law Code; this procedure is now being further developed to reflect the information in the Practice Guidance (published sometime after the code), any comments made by the Auditors in relation to the competency framework and the more general work nationally. Discussions have also taken place in SE London local authorities in an effort to introduce a more standardised system for competency assessment and endorsement. The existing Lead Officer Food has attended the FSA Lead Officer course on Competency and Authorisation requirements.

<p>3.3.7 Ensure that inspections/interventions are recorded in sufficient detail to demonstrate establishments have been fully assessed to the legally prescribed standards, the Food Law Code of Practice and centrally issued guidance. [The Standard - 7.2 and 7.3]</p>	<p>ALL DONE (except Mobile Working which is scheduled for 2017/2018)</p>	<ul style="list-style-type: none"> ▪ The existing Inspection Record Form enables the full assessment of an inspection intervention to be appropriately recorded (evidenced). ▪ An initial briefing will be held with officers to report on the Audit findings generally. ▪ One-to-one meetings will reinforce recording requirements following interventions ▪ Further work will be built into a planned longer term mobile working solution for the Service to enhance inspection reporting and the efficient and effective gathering of data / intelligence whilst limiting duplication. 	<ul style="list-style-type: none"> ▪ An officer briefing on the Audit findings was completed on 18th January. This included reference to 'Making every inspection count' and the appropriate completion of pages 2 & 3 of our existing Inspection Record Form. ▪ Officers currently on contract (to year end 2015/2016) have been apprised of the findings separately on an individual basis. ▪ The Enforcement Notice Checklist has been enhanced to confirm and record proof of service.
<p>3.5.5 (i) Further develop and implement its documented internal monitoring procedures in accordance with Article 8 of Regulation (EC) No. 882/2004, the Food Law Code of Practice and centrally issued guidance to include reviews of inspection records and risk scoring and follow up enforcement actions. [The Standard-19.1]</p>	<p>30/04/2016</p>	<ul style="list-style-type: none"> ▪ The Authority's existing Performance and Development Appraisal process includes a system for formal one-to-one meetings to review Objectives and Learning & Development targets set at annual appraisals and which already include service standards. ▪ We will further review our process for monitoring inspections and follow up enforcement action including how this data is recorded. ▪ Weekly Team Briefing Sessions (established as part of the new Commercial structure) will be used to discuss the completion of intervention records. ▪ Develop the use of Northgate M3 to enable certain key enforcement decisions, discussions on inspections and risk scoring and concomitant monitoring activities to be logged more fully. 	<ul style="list-style-type: none"> ▪ The internal monitoring processes have been reviewed, principally to include record keeping procedures for recording planned and reactive qualitative management; this includes documenting monitoring done following one-to-one meetings ▪ We have also introduced a more general system for recording 'key decisions' relating to the management of inspection and enforcement activity and much of this can be logged as an action / activity on our Northgate M3 database.
<p>3.5.5 (ii) Verify its conformance with the standard, relevant legislation the relevant Codes of Practice, centrally issued guidance and the Authority's own documented policies and procedures. [The Standard-19.2]</p>	<p>ON-GOING</p>	<ul style="list-style-type: none"> ▪ See 3.5.5 (i): The arrangements for internal monitoring will be enhanced and better recorded. This will be necessary following changes in the management structure within the Service. 	<p>See above</p>

3.5.5 (iii) Keep a record of all internal monitoring in particular record deviations and corrective actions. Records should be kept for at least 2 years. [The Standard-19.3]	ON-GOING		See above
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ANNEX B - Audit Approach/Methodology

The audit was conducted using a variety of approaches and methodologies as follows:

(1) Examination of LA policies and procedures.

The following relevant LA policies, procedures and linked documents were examined before and during the audit:

Food Service Plan
Officer authorisation, training and qualification records
Enforcement Policy
A range of food hygiene law enforcement procedures
Minutes of meetings and reports to members

(2) File reviews – the following LA file records were reviewed during the audit:

General food premises inspection records
Training records
Food and food premises complaint records
Food sample records
Formal enforcement records.

(3) Review of Database records:

To review and assess the completeness of database records of food hygiene inspections, food and food premises complaint investigations, samples taken by the authority, formal enforcement and other activities and to verify consistency with file records

To assess the completeness and accuracy of the food premises database

(4) Officer interviews – the following officers were interviewed:

Team Manager/ Lead Food Officer
Senior Environmental Health Officers
Environmental Health Officers

Opinions and views raised during officer interviews remain confidential and are not referred to directly within the report.

(5) On-site verification check:

A verification visit was made with an Officer from the Authority to a local food business. The purpose of the visit was to verify the outcome of the last inspection carried out by the Local Authority and to assess the extent to which enforcement

activities and decisions met the requirements of relevant legislation, the FLCoP and official guidance.

ANNEX C - Glossary

Authorised officer	A suitably qualified officer who is authorised by the local authority to act on its behalf in, for example, the enforcement of legislation.
Broadly Compliant	An outcome measure which the Food Standard Agency has developed with local authorities to monitor the effectiveness of the regulatory service relating to food law. It is based on the risk rating scheme in the Food Law Code of Practice which is currently used by food law enforcement officers to assess premises which pose the greatest risk to consumers failing to comply with food law.
Codes of Practice	Government Codes of Practice issued under Section 40 of the Food Safety Act 1990 as guidance to local authorities on the enforcement of food legislation.
County Council	A local authority whose geographical area corresponds to the county and whose responsibilities include food standards and feeding stuffs enforcement.
District Council	A local authority of a smaller geographical area and situated within a County Council whose responsibilities include food hygiene enforcement.
E. coli O157	E.coli O157 belongs to the group of verotoxigenic E. coli (VTEC) bacteria which are a toxin-producing strain of Escherichia coli that occur naturally in the gastrointestinal tract of animals such as cattle and sheep, and are pathogenic to humans. E.coli O157 is the VTEC strain that has been most commonly implicated in human infection in the UK.
External Temporary Storage Facility (ETSF)	A warehouse (formerly known as an enhanced remote transit shed or ERTS) designated by HM Revenue and Customs (HMRC), where goods are temporarily stored pending clearance by HMRC, and prior to release into free circulation.

Environmental Health Officer (EHO)	Officer employed by the local authority to enforce food safety legislation.
Feeding stuffs	Term used in legislation on feed mixes for farm animals and pet food.
Food hygiene	The legal requirements covering the safety and wholesomeness of food.
Food Hygiene Rating Scheme (FHRS)	The Food Hygiene Rating Scheme provides information to the public about hygiene standards in catering and retail food establishments. It is run by local authorities in partnership with the Food Standards Agency. Businesses that fall within the scope of the scheme are given a 'hygiene rating' which shows how closely the business was meeting the requirements of food hygiene law at the time of inspection. The scheme also encourages businesses to improve hygiene standards.
Food Safety Management System	A written permanent procedure, or procedures, based on HACCP principles. It is structured so that this requirement can be applied flexibly and proportionately according to the size and nature of the food business.
Food standards	The legal requirements covering the quality, composition, labelling, presentation and advertising of food, and materials in contact with food.
Framework Agreement	<p>The Framework Agreement consists of:</p> <ul style="list-style-type: none"> Food and Feed Law Enforcement Standard Service Planning Guidance Monitoring Scheme Audit Scheme <p>The Standard and the Service Planning Guidance set out the Agency's expectations on the planning and delivery of food and feed law enforcement.</p> <p>The Monitoring Scheme requires local authorities to submit yearly returns via LAEMS to the Agency on their food enforcement activities i.e. numbers of inspections, samples and prosecutions.</p>

	Under the Audit Scheme the Food Standards Agency will be conducting audits of the food and feed law enforcement services of local authorities against the criteria set out in the Standard.
Full Time Equivalents (FTE)	A figure which represents that part of an individual officer's time available to a particular role or set of duties. It reflects the fact that individuals may work part-time, or may have other responsibilities within the organisation not related to food and feed enforcement.
HACCP	Hazard Analysis and Critical Control Point – a food safety management system used within food businesses to identify points in the production process where it is critical for food safety that the control measure is carried out correctly, thereby eliminating or reducing the hazard to a safe level.
LAEMS	Local Authority Enforcement Monitoring System is an electronic system used by local authorities to report their food law enforcement activities to the Food Standards Agency.
Member forum	A local authority forum at which Council Members discuss and make decisions on food law enforcement services.
Metropolitan Authority	A local authority normally associated with a large urban conurbation in which the County and District Council functions are combined.
Risk rating	A system that rates food premises according to risk and determines how frequently those premises should be inspected. For example, high risk premises should be inspected at least every 6 months.
Safer food, better business (SFBB)	A food safety management system, developed by the Food Standards Agency to help small catering and retail businesses put in place food safety management procedures and comply with food hygiene regulations.
Service Plan	A document produced by a local authority setting out their plans on providing and delivering a food service to the local community.

Trading Standards	The Department within a local authority which carries out, amongst other responsibilities, the enforcement of food standards and feeding stuffs legislation.
Trading Standards Officer (TSO)	Officer employed by the local authority who, amongst other responsibilities, may enforce food standards and feeding stuffs legislation.
Unitary Authority	A local authority in which the County and District Council functions are combined, examples being Metropolitan District/Borough Councils, and London Boroughs. A Unitary Authority's responsibilities will include food hygiene, food standards and feeding stuffs enforcement.

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Committee:	Date:
Port Health and Environmental Services Committee	19 July 2016
Subject: Cemetery and Crematorium Risk Management	Public
Report of: Director Open Spaces	For Decision
Report Author: Gerry Kiefer, Open Spaces Business Manager	

Summary

This report provides the Port Health and Environmental Services Committee with an update on the management of risks faced by the Cemetery and Crematorium division within the Open Spaces Department. Risk is reviewed regularly by the Superintendent of the Cemetery and Crematorium and the Department's Senior Leadership Team as part of the ongoing management of the operations of the Department.

The Open Spaces Department has one corporate risk and five departmental risks. There are currently eleven risks for the Cemetery and Crematorium division with five reported as amber and six as green.

The Cemetery and Crematorium risks are:

- OSD CC 001: Failure of health and safety procedures - green
- OSD CC 002: Financial failure - amber
- OSD CC 003: Deterioration of buildings, plant and machinery - amber
- OSD CC 004: Anti-social behaviour - green
- OSD CC 005: Failure to recruit and retain staff with required skills - green
- OSD CC 006: Theft from offices - green
- OSC CC 007: Loss of access to the Cemetery & Crematorium - green
- OSD CC 008: Pandemic or Mass Fatalities incident - green
- OSD CC 009: Systems Failure - amber
- OSD CC 010: Extreme weather - amber
- OSD CC 011: Tree and plant diseases - amber

Recommendation

Members of the Port Health & Environmental Services Committee are asked to:

- Approve the Cemetery and Crematorium risk register at appendix 1.
- Agree the removal of the 'green' risks from future risk reports to their committee as proposed in paragraph 3.1.

Main Report

1. Background

- 1.1. The Open Spaces Department's risk registers conform to the City's corporate standards as guided by the Risk Management Strategy 2014, and all of the departmental and divisional risks are registered on the Covalent Risk Management System.

- 1.2. The Open Spaces Department manages risk through a number of important processes including: departmental and divisional risk registers, the departmental health and safety improvement group, divisional health and safety groups and risk assessments. Departmental risks are reviewed by the Department's Senior Leadership Team on a regular basis and Divisional risks by the Superintendents and their divisional management teams.

2. **Current Position**

- 2.1. The Open Spaces Department has one corporate risk:
- CR11 – Hampstead Heath ponds: overtopping leading to dam failure

Departmental Risks

- 2.2. The Open Spaces and City Gardens Committee is considering the Departmental risks at its committee meeting on 18 July. The report will identify to Members that there are five Departmental risks:
- OSD 001 - Ensuring the health and safety of staff, volunteers, contractors and public - amber
 - OSD 002 - Extreme weather - amber
 - OSD 004 - Poor repair and maintenance of buildings - amber
 - OSD 005 - Animal, plant and tree diseases - amber
 - OSD 006 - Impact of housing and/or transport development - red
- 2.3. The majority of these departmental risks relate to all the divisions within the Department and as such each division will implement a range of actions which will help reduce the Departmental risk.
- 2.4. The Cemetery and Crematorium have identified three additional risks since last reporting to the committee. These new risks are: systems failure, extreme weather and tree and plant diseases. The latter two correlate to departmental risks.

Cemetery and Crematorium: Summary of Divisional risks

- 2.5. There are currently eleven risks for the Cemetery and Crematorium division with five reported as amber and six as green. There are no red risks.

OSD CC 002: Financial failure – amber

- 2.6. Fluctuations in the number of burials and cremations will have a significant impact on income and unexpected expenditure on property and infrastructure will increase unplanned expenditure. Both of these affect the final net position. A wide range of processes are in place to mitigate this risk; in addition to frequent monitoring of budgets; such as assessing the market when setting fees and charges, maintaining relationships with funeral directors and working closely with City Surveyors to implement planned maintenance programmes.

OSD CC 003: Deterioration of buildings, plant and machinery – amber

- 2.7. This risk recognises the issues that the Cemetery and Crematorium has experienced in relation to planned and reactive maintenance which has resulted in delays to repairs. This has affected service delivery/staff comfort and if on-going will result in the deterioration of assets. The department is inputting into the development of the new repairs and maintenance contract

specification and regular meetings/inspections are held with City Surveyor's officers. The risk has reduced slightly as the three cremators have been relined and new analytical panels added so the cremators operating well. It is anticipated that this risk will reduce to green.

OSD CC 009: Systems Failure – amber. This is a new risk

- 2.8. Recently the quality of IT services across the Corporation has been poor and this is affecting the efficiency and business of services. The cemetery and crematorium has experienced problems with telephony and computer systems and whilst implementation of business continuity arrangements meant that this did not have a major impact on the cemetery and crematorium business, ongoing poor IT and telephony service is a cause concern.

OSD CC 010: Extreme weather – amber. This is a new risk.

- 2.9. With the fluctuations in weather conditions and the potential risks caused by severe wind in particular, the impact could cause damage to property, trees, and disrupt access. A group of staff within the cemetery team are trained in the operation of chainsaws for clearing fallen trees. This risk is constantly present and as such the target risk score is the same as the current score as there is little more that can be reasonably done to mitigate the risk.

OSD CC 011: Tree and plant diseases – amber. This is a new risk.

- 2.10. The 'natural' spread of pests and diseases from neighbouring areas means that the Cemetery and Crematorium is at risk from a wide range of infestations including oak processionary moth. The impact could result in partial closure of the site or loss of mature trees which would have a detrimental effect on the listed landscape. Currently, this risk is constantly present and as such the target risk score remains amber although we anticipate the impact may reduce slightly, but there is little more that can be reasonably done to mitigate the risk.

3. Proposal

- 3.1. It is proposed that the following risks are removed from future reports. The current risk score for all of these is 'green'. Details regarding these risks are included in appendix 1. These risks will continue to be monitored and assessed and if there are any changes which result in an amber or red assessment their reporting will be reinstated.

Risk	Reason for removal from Departmental risk register
OSD CC 001 Failure of health and safety procedures	Current risk is green (4) Increased training on health and safety and risk assessments has helped reduce the indicator. The service is unlikely to be able to further reduce the current score as the risk, even though low, is constantly present and as such the target risk score is the same as the current score
OSD CC 004 Anti-social behaviour	Current risk is green (3) Improvements to the alarm and continuing good relationship with the Police result in this risk being assessed as green
OSD CC 005 Failure to recruit	Current risk is green (3) Improved structure within supervisory team, in landscapes

Risk	Reason for removal from Departmental risk register
and retain staff with required skills	team and grade improved for Cemetery and Crematorium Manager has reducing this risk score.
OSD CC 006 Theft from offices	Current risk is green (4) A recent Audit found the systems in place to be adequate. A new cash safe has been purchased and. G4S collect cash daily.
OSC CC 007 Loss of access to the Cemetery & Crematorium	Current risk is green (4) A business continuity plan is in place and staff are aware of the actions that will need to be taken as well as working with the police and others to ensure that the site was re-opened as soon as possible.
OSD CC 008 Pandemic or Mass Fatalities incident	Current risk is green (4) Business continuity plan identifies the actions should this situation arise and the plan is reviewed regularly.

4. Corporate & Strategic Implications

4.1. The divisional risk register reflects the Open Spaces Department's four objectives as set out in the departmental business plan:

- a) Protect and conserve the ecology, biodiversity and heritage of our sites
- b) Embed financial stability across our activities by delivering identified programmes and projects
- c) Enrich the lives of Londoners by providing a high quality and engaging learning and volunteering offer
- d) Improving the health and wellbeing of our communities through access to green space and recreation.

4.2. The use of the divisional risk register, as part of a suite of similar documents that inform the collective departmental risk, supports the City of London's Strategic Aim 3: To provide valued services to London and the nation and Key Policy Priority 3: Engaging with London and national government on key issues of concern to our communities such as transport, housing and public health.

5. Conclusion

5.1. The need to systematically manage risk across the Department and at a divisional level for the Cemetery and Crematorium is addressed by the production of this risk register.

Appendices

Appendix 1 – Cemetery and Crematorium Risk register

Background Papers: None

Gerry Kiefer

Business Manager


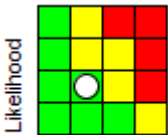

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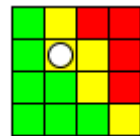
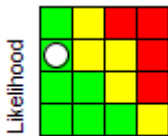

E: Gerry.kiefer@cityoflondon.gov.uk

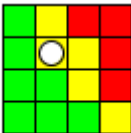
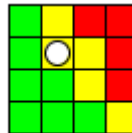
Appendix 1: OSD Cemetery and Crematorium Risk Report

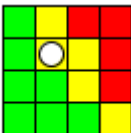
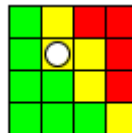
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Rows are sorted by Risk Score

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
OSD CC 002 Financial failure <div>Page 101</div> <div>Aug-2015</div> <div>Gary Burks</div>	Causes: Reduction in the number of burials, cremations and grave purchases. Increased unexpected expenditure due to building, plant or machinery failure. Charges too high for local market. Unanticipated high recharges. Insufficient burial space, cremators cannot be operated, poor budget monitoring, increased competition from other providers Event: Net agreed budget position not met at year end. Impact: Financial and reputational impact. Reduction in quality of service.	 Likelihood Impact	6	Cremator maintenance is in a better position than previously . Longer term provision of burial space through reuse and the provision of the Shoot has been identified and reported to Committee. Due to the number of burial options available we can offer a grave at a reasonable price but must consider the whole life costs to ensure that we are charging correctly 06 Jun 2016	 Likelihood Impact	4	31-Mar-2017	 Increased Risk Score
Action no, Title,	Description			Latest Note		Managed By	Latest Note Date	Due Date
OSD CC 002 a Burial management	Review undertaken of remaining and additional burial space. Fees comparisons with neighbouring/competitor facilities used to inform annual fees and charges Consideration when setting fees and charges with 'whole life' costs. Effective relationships developed with funeral directors. Monitor any significant changes in competition or ownership of nearby crematoria Ongoing			'Burial Space Plan for the City of London Cemetery' Report to Port Health and Environmental Services Committee in March 2016 setting out current availability and a plan for the next 15 years provision including the new space created by the Shoot and reuse of graves.		Gary Burks	01-Jun-2016	31-Mar-2017
OSD CC 002 b Effective maintenance management	Continue to work with City Surveyors to ensure that planned and preventative maintenance and AWP works for buildings and cremators is effective. Ongoing			Cem & Crem Superintendent will work with City Surveyors, CLPS and industry experts to take a cremator replacement project through the Gateway process in the coming years.		Gary Burks	07-Jun-2016	31-Mar-2017
OSD CC 002 c Budget management	Regular monitoring of income and expenditure and budget adjustments made where appropriate and necessary			Regular and ongoing budget monitoring		Gary Burks	03-Jun-2016	31-Mar-2017

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
OSD CC 003 Deterioration of buildings, plant and machinery 19-Aug-2015 Gary Burks	Causes: Inadequate proactive and reactive maintenance; failure to identify and communicate maintenance issues Event: Operational or public buildings become unusable. Plants and trees die. Impact: Service capability disrupted; ineffective use of staff resources; damage to corporate reputation; increased costs for reactive maintenance	 Likelihood Impact	6	Risk reduced slightly as had three cremators relined and new analytical panels added so cremators operating well, but little change in relation to Buildings other than front gate which is being repaired. 07 Jun 2016	 Likelihood Impact	3	01-Aug-2017	 No change
Action no, Title,	Description			Latest Note		Managed By	Latest Note Date	Due Date
OSD CC 003 a Operational Property Review	Implementation of property review which aims to rationalise operational buildings across open spaces.			City Surveyor's Department attends Senior Leadership meetings to give progress updates. Disused toilets in the C&C declared surplus to operational requirements Rabbits triangle declared surplus		Gary Burks	01-Jun-2016	31-Jul-2016
OSD CC 003 b Building R&M	Develop relationship with City Surveyors and ways of working to ensure AWP works are delivered Regular meetings with CS's Property Facilities Managers Input into 2017+ R&M specification and tender documents			Actions are ongoing. Superintendent attends Customer Working Group inputting into new BRM tender process		Gary Burks	03-Jun-2016	31-Jul-2017

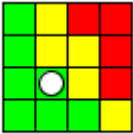
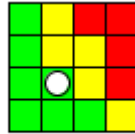

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
OSD CC 009 Systems Failure 01-Jun-2016 Gary Burks	Cause: IT systems including telephony fail Effect: Unable to operate as per normal. Unable to access Gower system. Unable to speak to funeral directors, doctors and internally across the site Impact: Burials and cremations may have to be cancelled/no bookings can be taken. Burials in the wrong graves. Loss of income. Reputational damage	Likelihood  Impact	6	Recent problems with telephony and computer systems did not have a major impact on services because they were managed through use of mobile phones and manual back-up systems. Current and target score to match as a lower target score not able to be achieved until corporate OT becomes more reliable and stable. 07 Jun 2016	Likelihood  Impact	6	31-Mar-2017	New risk
Action no, Title,	Description			Latest Note		Managed By	Latest Note Date	Due Date
OSD CC 009 a Business continuity Page 03	Review continuity plans on a regular basis and following significant systems failures Ensure staff are familiar with 'alternate operations' as detailed in the continuity plans IS partners aware that C&C is recognised as a 'critical' service and failures are treated as a priority.			Use of mobile phones and manual systems has been required due to IT issues. IT Business partner escalated issues to 'priority' status due to business impact		Gary Burks	07-Jun-2016	31-Mar-2017

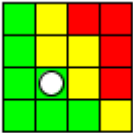
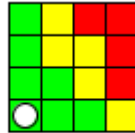

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
OSD CC 010 Extreme weather 21-Jun-2016 Gary Burks	Cause: Strong winds causing significant tree damage within the cemetery and crematorium landscape Effect: Roads closed, exclusion of the public, disruption to funerals Impact: Significant cost to division and possible loss of income/ negative publicity	Likelihood  Impact	6	There is a residual significant risk as we can do little to change the course of nature, but have systems in place and experienced staff to deal with any such incident 21 Jun 2016	Likelihood  Impact	6	31-Mar-2017	New risk

Action no, Title,	Description	Latest Note		Managed By	Latest Note Date	Due Date
OSD CC 010 a Wind damage	A significant storm could (and has in the past) cause significant damage to tree stocks and buildings meaning that for a short period of time the cemetery roads could be closed and block, and one or more buildings could be out of action. Tree inspections Maintain staff with chainsaw qualifications	Trees are surveyed and inspected with advisory works carried out. A group of staff within the cemetery team are trained in the operation of chainsaws for clearing fallen trees. It is unlikely that storm damage would close the modern crematorium building but could damage other service chapels and block roads. The cemetery and crematorium service has 6 service chapels.		Gary Burks	21-Jun-2016	31-Mar-2017

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
P89 OSD CC 011 Tree and plant diseases 21 Jun-2016 Gary Burks	Cause: Tree Disease or infestation Effect: Loss of tree stock or exclusion of the public from certain areas of the cemetery Impact: Partial closure of site or loss of mature trees and the affect that this would have on the landscape	<div>Likelihood</div> <div><div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div></div><div>Impact</div></div>	6	Trees are surveyed and inspected, departmental experts have been setting pheromone traps in vulnerable tree stock 21 Jun 2016	<div>Likelihood</div> <div><div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div></div><div>Impact</div></div>	6	31-Mar-2017	New risk
Action no, Title,	Description			Latest Note		Managed By	Latest Note Date	Due Date
OSD CC 011 a Tree surveys	Regular monitoring of trees. Engagement of specialists where required			Continued monitoring and surveys should flag up tree disease or infestation in the early stages, at which time advice will be sought action taken		Gary Burks	21-Jun-2016	31-Mar-2017

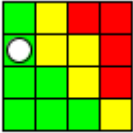
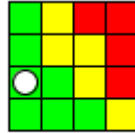

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
OSC CC 007 Loss of access to the Cemetery & Crematorium 01-Jun-2016 Gary Burks	Cause: Police/COL close site (or access to) for H&S/emergency/investigatory reasons Effect: Inability to undertake burials or cremations, visitors not able to visit graves, Impact: potential reputational damage, financial loss	<div><div>Likelihood</div><div><div><div><div></div><div></div><div></div><div></div></div><div><div></div><div></div><div></div><div></div></div><div><div></div><div></div><div></div><div></div></div><div><div></div><div></div><div></div><div></div></div></div><div><div></div><div></div><div></div><div></div></div><div><div></div><div></div><div></div><div></div></div><div><div></div><div></div><div></div><div></div></div></div><div>Impact</div></div>	4	No change to risk status. The Cemetery and Crematorium has a fit for purpose Business continuity plan should a situation arise whereby the site is closed to access. If not other route than to close the site we would advise service users accordingly and work with the police and others to ensure that the site was re-opened as soon as possible. 21 Jun 2016	<div><div>Likelihood</div><div><div><div><div></div><div></div><div></div><div></div></div><div><div></div><div></div><div></div><div></div></div><div><div></div><div></div><div></div><div></div></div><div><div></div><div></div><div></div><div></div></div></div><div><div></div><div></div><div></div><div></div></div><div><div></div><div></div><div></div><div></div></div><div><div></div><div></div><div></div><div></div></div></div><div>Impact</div></div>	4	31-Mar-2017	<div>↔</div> No change
Risk no, Title,	Description	Latest Note			Managed By	Latest Note Date	Due Date	
OSD CC 007 a Critical Service	The Cemetery and crematorium is registered as a critical service and as such, space is allocated at the City's recovery centre for staff to operate				Gary Burks		31-Mar-2017	
OSD CC 007 b Communication	The Business Continuity Plan sets out that staff would contact funeral directors direct and maintain a presence outside the cemetery if possible to advise visitors				Gary Burks		31-Mar-2017	
OSD CC 007 c Alternate venues	The City has an informal agreement with Manor Park cemetery and immediate cremation bookings could be diverted there.				Gary Burks		31-Mar-2017	

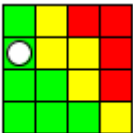
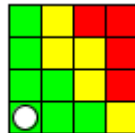

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
OSD CC 001 Failure of health and safety procedures 18-Aug-2015 Gary Burks	Causes: Poor understanding and/or delivery of Health and Safety policies, procedures and safe systems of work: inadequate training, failure to implement the results of audits, dynamic risk assessments not undertaken Event: Staff, volunteers or contractors undertake unsafe working practices Impact: Injury or death of staff, contractor, volunteer or member of the public	Likelihood  Impact	4	Increased training on health and safety and risk assessments has helped reduce the indicator. Unlikely to be able to further reduce target score so current and target remains the same and assumes ongoing levels of training and focus on H&S. 03 Jun 2016	Likelihood  Impact	4	01-Apr-2017	 Decreased Risk Score
Action no, Title,	Description			Latest Note		Managed By	Latest Note Date	Due Date
OSD CC 001 a Regular reviews	Regular reviews of risk assessments and safe systems of work are undertaken.			Ongoing		Gary Burks		31-Mar-2017
OSD CC 001 b Operational learning	Investigations undertaken and learning taken from all accidents and incidents and near misses. Training and development of staff			Ongoing		Gary Burks		31-Mar-2017

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
OSD CC 006 Theft from offices 19-Aug-2015 Gary Burks	Cause: Cash handling in offices with staff receiving large sums of money for the purchase of graves. Event: Theft of a significant sum of money. Impact: Monetary loss, staff impact, reputational impact.	Likelihood  Impact	4	A recent Audit found the systems in place to be adequate and recommended a maximum cash payment that could be accepted in line with financial regulations. 21 Jun 2016	Likelihood  Impact	1	31-Mar-2016	 No change

Action no, Title,	Description	Latest Note	Managed By	Latest Note Date	Due Date	
OSC CC 006A Cash handling	Review of all cash handling guidance notes	A new cash safe has been purchased and procedures are in place with regard to the handling and securing of cash. G4S collect daily.		21-Jun-2016	01-Apr-2016	

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
OSD CC 008 Pandemic or Mass Fatalities Incident 04 Jun-2016 Gary Burks	Cause: Major incident or pandemic causing mass fatalities in the areas served by the Cemetery and Crematorium Effect: Significant increase in local deaths (need for burial and cremation) coupled with a possible reduction in staff in the case of a pandemic. Impact: Dramatic increase or spike in service need that would have to be accommodated (we are the largest local provider in the area).	<div>Likelihood</div> <div>Impact</div>	4	Updated annually as part of our Business Continuity Action Plan. 21 Jun 2016	<div>Likelihood</div> <div>Impact</div>	4	31-Mar-2017	<div>↔</div> No change
Action no, Title,	Description			Latest Note		Managed By	Latest Note Date	Due Date
OSD CC 008 a Pandemic/mass fatalities contingency plan	Continue to update plan and ensure that our ability to react to change remains credible.			Ongoing		Gary Burks		31-Mar-2017

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
OSD CC 004 Anti-social behaviour 19-Aug-2015 Gary Burks	Cause: Improper monitoring of access to the grounds. Lack of security on the grounds. Poor relations with local police. Event: Vandalism or damage to the site. Crimes committed on the grounds. Impact: Reputational impact. Maintenance or repair costs. Negative effect on business.	 Likelihood	3	Alarms are fully operational now 03 Jun 2016	 Likelihood	2	31-Mar-2017	 No change
Action no, Title,	Description			Latest Note		Managed By	Latest Note Date	Due Date
OSD CC 004 A Development of links with police forces in areas neighbouring sites.	Good communication with local police. Appropriate alarms and security arrangements			Communication remains good with local police and recent improvements to the cemetery intruder alarm systems have been completed. Increases in night patrols have also been achieved		Gary Burks	21-Jun-2016	01-Aug-2016

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
OSD CC 005 Failure to recruit and retain staff with required skills 19-Aug-2015 Gary Burks	Cause: Failure to provide attractive employment prospects for skilled staff. Event: Staff capacity greatly reduced as skilled workers move to other fields. Impact: Reduced capacity, decline in quality of work, reduced ability to deliver core responsibilities, staff motivation declines.	 Likelihood	3	Improved structure within supervisory team, in landscapes team and grade improved for Cemetery and Crematorium Manager has assisted in reducing this risk score. 07 Jun 2016	 Likelihood	1	31-Mar-2017	 Decreased Risk Score

Action no, Title,	Description	Latest Note	Managed By	Latest Note Date	Due Date
OSD CC 005 a Training	Agree departmental training plan Identify training of staff to fill key roles in future years Invest in internal and external training and accreditation for staff	Training ongoing	Gary Burks	07-Jun-2016	31-Mar-2017
OSD CC 005 b Recruitment	Ensure appropriate publications/outlets used to advertise key roles Consider use of apprenticeships Maintain contacts of quality staff engaged as agency workers	To be considered as opportunities arise	Gary Burks	07-Jun-2016	31-Mar-2017

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Committee:	Date:
Port Health & Environmental Services	19 July 2016
Subject: Department of the Built Environment(Cleansing Services) Business Plan Progress Report for Period 3 (December – April), 2015/16	Public
Report of: Director of the Built Environment	For Information
Report author(s): Jim Graham, Department of the Built Environment Simon Owen, Chamberlain's Department	

Summary

1. This report sets out the progress made during Period 3 (December - April) against the 2015/18 DBE Business Plan for Public Conveniences, Waste Collection, Street Cleansing, Waste Disposal and Transport Services. It details what has been achieved, and the progress that has been made against the departmental objectives and key performance indicators.
2. The 2015/16 year end outturn position for the Department of Built Environment services covered by Port Health & Environmental Services Committee reveals a net underspend for the Department of £26k (0.4%) against the overall net local risk budget of £6.9m for 2015/16. Appendix C sets out the detailed position for the individual services covered by this department.
3. The Director of Built Environment also had local risk underspending totalling (£386k) within other Committees she supports. The Director is proposing that £336k of her total eligible underspend be carried forward, of which £85k relates to activates overseen by your Committee. The detail will be reported in the Port Health & Environmental Services Committee Outturn report and these requests will be considered by the Chamberlain in consultation with the Chairman and Deputy Chairman of the Resource Allocation Sub Committee.

Recommendations

Members are asked to:

- note the content of this report and the appendices
- receive the report.

Main Report

Background

1. The 2015-18 Business Plan of the Department of the Built Environment was approved by this committee on 05 May 2015. As agreed, periodical progress reports will be provided.

Key Performance Indicators

2. During Period 3 (December – April) of this Business Plan, the management team is monitoring five Key Performance Indicators (KPIs) relevant to the work of this Committee (shown in Appendix A). Performance against the departmental KPIs was mixed, with performance against NI191 and NI192 (amount of residual domestic waste per household and percentage of domestic waste recycled) not meeting their targets.
3. The adjustment to the housing stock figure that is used to calculate the NI191 figures has been made and this has brought the overall figure for the year to within 20kg per household per annum of the rigorous local target set for the year.
4. The progress of the Recycling Action Plan put in place to improve NI192 performance was detailed in a separate report to this Committee in January 2016. Steady progress against this plan continues with the overall percentage of household waste recycling in this period being 2% up on the start of the year.
5. Our NI195 KPI (measuring the amount of land with unacceptable level of litter, detritus, fly tipping and graffiti), which is independently monitored by Keep Britain Tidy, achieved well above the target, with only 0.21% of all 900 areas surveyed failing to meet the required standards of cleanliness over the course of the year.

Objective Updates

6. The City Toilet Finder app, launched in April 2015, continues to be success with over 9,500 people having downloaded the app in its first year.
7. Composition analysis on the City's waste and recycling streams has been completed. The initial data shows that more recycling is being captured on the Estates than in private blocks of flats. This means that the private blocks of flats tend to dispose of more recyclables in their general waste, rather than through the recycling service. The reason for this may be because private blocks of flats tend to have a more transient population than the Estates and therefore the effects of communication and awareness raising campaigns may be short-lived in the private blocks. Officers will be working with private blocks of flats to try and increase the capture rate of recycling from this property type to try and improve their performance.
8. The implementation of Body Worn Video as an aid for enforcement officers was completed in January. A six month trial and consultation period has been underway and a separate report is being presented to this committee on the outcomes.

Achievements

9. In February the City was crowned Local Authority of the Year at the Keep Britain Tidy Network Awards in Birmingham. This award recognises the City's achievements in keeping its public areas clean and safe for residents, workers and visitors. The award was given in recognition of the success of proactive campaigns, such as No Small Problem, and the on-going hard work of the Cleansing Service and its Contractor Amey.

10. Following the purchase of the Hazardous Waste Service contractor, PHS, by Biffa in October 2015, all participating Boroughs (which comprises all London Boroughs with the exception of Hillingdon) have agreed to the novation of the contract which is currently awaiting finalisation by the City Comptroller.
11. Our NI 195 scores from Keep Britain Tidy, which indicate the percentage of streets with unacceptable levels of litter, detritus graffiti and flyposting, were only slightly higher (0.04%) than the first period of this year, which were our lowest ever received. This maintains our consistently low level scoring that has seen consistent results of under 0.25% since October 2014.
12. We have maintained our Gold Standard accreditation with Transport for London Fleet Operator Recognition Scheme (FORS) which acknowledges excellence in all aspects of safety, fuel efficiency, economical operations and vehicle emissions. This scheme recognises over 4,500 fleets that operate throughout London with only just over 100 of these organisations currently achieving Gold. The FORS scheme is closely linked with CLOCS (Construction, Logistics and Cycle Safety), TfL's work related road risk scheme for lorries, which requires high levels of safety equipment and training for drivers. The City has exceeded the requirements of this scheme in fitting side guards, additional mirrors, audible alarms and cameras to all eligible City vehicles.

Financial and Risk Implications

13. The 2015/16 year end outturn position for the Department of Built Environment services covered by Port Health & Environmental Services Committee reveals a net underspend for the Department of £26k (0.4%) against the overall net local risk budget of £6.9m for 2015/16. Appendix C sets out the detailed position for the individual services covered by this department.
14. The Director of Built Environment has requested to carry forward the majority of this underspend into 2016/17, along with underspends within other Committees she supports. The total carry forward requested is £336k, of which £85k relates to Port Health & Environmental Services Committee activities and £251k to Planning & Transportation Committee activities. These requests will be considered by the Chamberlain in consultation with the Chairman and Deputy Chairman of the Resource Allocation Sub Committee.
15. The better than budget year end position of £26k (0.4%) was due to the following main underspend:
 - Public Conveniences (£61k) underspend mainly due to a reduction in employee costs relating to overtime, together with an underspend due to the planned upgrade of the Automatic Public Convenience in Aldermanbury not being completed during the year.
16. The yearend underspend was partly offset by the following overspend:
 - Transport Organisation £34k overspend due to an increase in contract costs for reactive vehicle maintenance, partly offset by an increase in income for recharge of maintenance costs to departments.
17. Appendices
 - Appendix A – Period 2 KPI results
 - Appendix B – Finance Report

Background Papers

DBE Business Plan 2015-18

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Departmental Key Performance Indicators

	This indicator is performing to or above the target.
	This indicator is a cause for concern, frequently performing just under target.
	The indicator is performing below the target.

		Target 15/16	Period 1	Period 2	Period 3	Overall
Transportation & Public Realm						
NI 191	To reduce the residual annual household waste per household.	373.4kg	130.1kg	138.7kg	124.1kg	393.7kg
NI 192	Percentage of household waste recycled.	45%	30.88%	31.49%	32.75%	31.37%
NI 195	Percentage of relevant land and highways from which unacceptable levels of litter, detritus, graffiti and fly-posting are visible.	2%	0.17%	0.25%	0.21%	0.21%
TPR1	No more than 1 failing KPIs, per month on new Refuse and Street Cleansing contract	<4 per period	3	4	3	10
Comments: NI192: The rate reduced in 2014-15 as work was successfully carried out to achieve a consistently acceptable contamination level (between 5-8%). The reviewed and updated Recycling Action Plan is currently being implemented and it is anticipated that this will lead to an increase in the recycling rate.						
DM7	To manage responses to requests under the Freedom of Information act within 20 working days. (Statutory target of 85%)	85%	100%	97%	95%	97%

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Department of Built Environment Local Risk Revenue Budget - 1st April to 31st March 2016
(Income and favourable variances are shown in brackets)

	Final Budget 2015/16			Revenue Outturn 2015/16			Variance (Better) / Worse		Notes
	Gross Expenditure £'000	Gross Income £'000	Net Expenditure £'000	Gross Expenditure £'000	Gross Income £'000	Net Expenditure £'000	£'000	%	
<u>Port Health & Environmental Services (City Fund)</u>									
Public Conveniences	1,106	(435)	671	1,052	(442)	610	(61)	(9)	1
Waste Collection	1,027	(637)	390	1,077	(683)	394	4	1	
Street Cleansing	4,389	(489)	3,900	4,427	(554)	3,873	(27)	(1)	
Waste Disposal	1,325	(689)	636	1,342	(671)	671	35	6	
Transport Organisation	252	(130)	122	302	(146)	156	34	28	2
Cleansing Management	439	0	439	416	0	416	(23)	(5)	
Director and Support	704	(6)	698	716	(6)	710	12	2	
TOTAL PORT HEALTH & ENV SRV COMMITTEE	9,242	(2,386)	6,856	9,332	(2,502)	6,830	(26)	(0)	

Notes (only variances of at least £50,000 or 10% of budget for a service are explained below):

- Public Conveniences** - favourable outturn mainly due to a reduction of (£23,000) in employee costs mainly relating to reduced overtime, together with an underspend of (£35,000) due to the planned upgrade of the Automatic Public Convenience in Aldermanbury not being completed during the year.
- Transport Organisation** - year end overspend due to an increase of £43,000 in contract costs for reactive vehicle maintenance, partly offset by an increase in income of (£16,000) for recharge of maintenance costs to departments.

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Committee(s)	Dated:
Port Health and Environmental Services Committee	19 July 2016
Subject: Update on the Body Worn Video trial	Public
Report of: Director of the Built Environment	For Decision
Report author: Jim Graham, Department of the Built Environment	

Summary

The City has recently conducted a six month trial of body worn video (BWV) for use by Street Environment Officers (SEOs). The SEO team perform a key role in ensuring that the cleansing of the City's streets is maintained to standard and that businesses within the square mile dispose of waste legally; additionally the SEO team are responsible for implementing the City's out-of-hours noise service that operates seven days per week. The majority of the work undertaken by the SEO team involves regulatory enforcement.

The trial of BWV has assisted SEOs in their duties by providing accurate, irrefutable evidence of interventions and interaction between SEOs and the persons with whom they engage. This has been of particular benefit when issuing fixed penalty notices (FPNs) on the street to persons committing environmental crime, for example leaving litter, in such circumstance the BWV recording can provide supporting evidence in prosecutions and has also been perceived to have reduced aggression towards officers. BWV has also been found to be of significant value when attending noise call-outs, especially as for such work officers usually work alone and can be required to deal with contentious issues. Additionally the BWV has enabled senior managers to have accurate evidence when reviewing complaints from the public, enabling their quick and reliable resolution. As BWV is only used at specific incidents and not "always on" there is no unnecessary and disproportionate intrusion onto the public. There have been no comments received during the public consultation regarding the use of BWV on the City of London's website over the last six months.

Recommendation(s)

Members are asked to:

- Agree the introduction of body worn video.

Main Report

Background

1. Body worn video (BWV) has routinely been used by public bodies, including local authorities since its introduction in 2006 to capture both video and audio information. SEOs commenced the use of BWV in January 2016 as part of a six month trial following the proposal as was put to committee in 2015.

2. SEOs daily duties include ensuring that the City's streets are maintained to an agreed standard of cleanliness and that they remain, so far as is reasonably practicable, free of litter and waste accumulations. Undertaking this line of work involves regular and frequent contact with the general public and business stakeholders, frequently in the context of face to face enforcement of criminal law, meaning a high level of exposure to confrontation.
3. SEOs have used BWV solely in an incident specific manner and not recording, for example, an entire patrol as this would be disproportionate and would incur needlessly high levels of collateral intrusion. Only when the SEO deems it necessary has the BWV been switched to record mode.

Current Position

4. SEOs perform key functions in the City's out-of-hours noise service. This involves face to face contact with both complainants and the subject of complaints. For these tasks SEOs work alone and are required to enter persons homes and workplaces where they could potentially be exposed to false allegations regarding their conduct or to claims/promises that they may have been alleged to have stated. BWV provides clear and irrefutable evidence to either support or challenge any allegations made.
5. The impact of false allegations being made can have a significant impact on resources as they naturally require full investigation. To add to this there is a potentially serious level of stress incurred by the officer(s) against whom the allegations are made. By using BWV we have already experienced what prompt and effective resolve can be achieved, an example being when a person issued with a fixed penalty notice for the offence of leaving litter subsequently lodged a complaint against the issuing officer claiming that the officer had been rude and aggressive. Senior managers were immediately able to view the footage allowing them to witness the incident as if first hand and, in this instance, disprove the allegation within minutes, a much swifter route to conclusion than would have been necessary without the availability of BWV whereby managers and officers time would have drained by undergoing a series of interviews of persons present so as to glean what occurred. Having the ability to prove the facts of the matter also served to reduce the impact of stress on the officer involved.
6. The Environmental Health Pollution Team review BWV recordings following noise complaints and if they are contentious or evidential (more often contentious than evidential) it is invaluable to see and hear the events as they unfold. Sometimes complaints can be exaggerated by the complainant and reviewing the footage showing the facts of an environmental impact. Particularly useful cases of BWV usage have involved a construction site being less than truthful with events both of how they were working and what they claimed an officer advised them. BWV was able to prove the facts of the matter beyond dispute. Another beneficial example experienced during the trial period has been proving exaggeration by residents as to noise impacts thereby allowing officers watching the footage to make better informed decisions as notes in a pocket book only go so far descriptively.

7. Throughout the six month trial period the use of BWV by SEOs has been publicised on the City's website welcoming the public to express their opinion on the matter via a dedicated email address; no comments were received. Likewise there has been no negative feedback from the public regarding the use of BWV whilst it has been in operational use.
8. SEOs and their line management were consulted as to their opinion of how effective BWV is as a tool to support the undertaking of their duties and it was resoundingly made clear that it is seen as a benefit, both for the reasons already cited and because in the opinion of the SEOs BWV has an effect on behaviour of persons with whom they are engaging that noticeably reduces aggression, consequently improving officer safety. The ability to review difficult incidents also benefits the SEOs in identifying lessons learnt and future training requirements.

Options

9. Members can approve the continued use of BWV by SEOs, or instruct officers to cease using the equipment.

Proposals

10. BWV for use by SEOs is proving to be a strong and effective tool and as such its proposed continued use is supported by SEOs, cleansing management, City Police Licensing officers and Environmental Health Management. For this reason it is proposed that the use of BWV by SEOs be continued on a permanent basis.

Corporate & Strategic Implications

11. The continued use of BWV for use by SEOs contributes towards the provision of an efficient and high quality local service for workers, residents and visitors in the Square Mile by improving efficiency of working, minimising threats towards officers and improving the quality of investigation in relation to complaints and challenges to enforcement work, especially FPNs.

Implications

12. The licence fee for use of evidence.com (the cloud based storage facility for the recorded footage and software providing an audit trail of the recordings) is £1,925 per annum which will be absorbed within the local risk budget.
13. The Protocol for the use of BWV complies with the Data Protection Act 1998, which regulates the processing of personal data. The Freedom of Information Act 2000 provides for a general right of access to information, which is not personal data held by public bodies. The Human Rights Act 1998, Article 6 (right to a fair trial) requires recordings that might have the potential to be used in court proceedings, to be safe guarded i.e. need an audit trail. Article 8

(right to respect for private life) requires that recordings, which may potentially be private, must not go beyond what is necessary.

14. All captured data is processed to comply with the Data Protection Act 1998, and adherence to ICO guidance. The City recognises the risk of enforcement action, which could be taken under the Data Protection Act 1998 should any processing breach occur.

Conclusion

15. This report provides information to Members on the continued use of Body Worn Video (BWV) for SEOs as means of a reasonable measure to protect the personal safety of officers and continual improvement of the delivery of environmental crime enforcement within the City.

Background Papers

Introduction of Body Worn Video for Street Environment Officer, PHES, 05 May 2015

Appendices

None

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