



COMMERCIAL ENVIRONMENTAL HEALTH TEAM SERVICE PLAN 2020-2021

Foreword

This year's Service Plan is very different to normal as are the times it was written in. The COVID-19 virus pandemic has forced us to go into lockdown but from which City business whom we service will seek to recover and eventually return to a new normality.

Our annual Service Plan, covering both Food Safety and Health & Safety, is normally overtly pro-active with an inspection programme of businesses and office buildings whilst still being reactive to consumers enquiries, businesses requesting advice and members of the public registering a complaint.

Unfortunately, the COVID-19 pandemic has changed that and we have taken a pragmatic approach this year, realising that it would be impossible to fulfil all of our obligations with all Food Safety inspections initially suspended by the Food Standards Agency but then slowly opening up to remote surveillance of high risk businesses and activities and all that time with our staff working for home and only venturing into the City for emergencies.

However, we believe we have developed a plan that will:-

- a) assist City businesses recover;
- b) will ensure monitoring and inspection of those businesses who pose the greatest risk post-recovery; and
- c) gradually move back to a traditional inspection programme

We are unable with any certainty to give dates, time or even targets for some key elements of the plan, only that we will be undertaking certain activities as and when we are able to in order to protect City businesses, workers, residents and visitors going forward through this difficult year.

Gavin Stedman
Port Health & Public Protection Director

June 2020

Introduction

The Commercial Environmental Health Team is responsible for regulating food safety (standards and hygiene), occupational health & safety, some statutory nuisances (not noise) and the investigation of certain infectious diseases arising from activities for which we are the enforcing authority. Environmental Health Practitioners are uniquely placed to help deal with the crisis caused by the COVID-19 pandemic. The team is involved in a number of workstreams designed to help manage the problems that have arisen and to facilitate recovery.

It is clear businesses and employers will need support as they implement new requirements and guidance to ensure adequate controls are in place to protect their employees and the public. Building worker and consumer confidence is going to be a significant challenge and we are here to help navigate the processes, protecting the public through a range of enforcement and advice functions. In doing so we are advocating a proportionate and pragmatic approach to enforcing business restrictions and social distancing in the workplace.

This plan has been prepared to accord with Food Standards Agency (FSA) and Health & Safety Executive (HSE) frameworks on the planning and delivery of our services. These frameworks have been significantly challenged in light of the pandemic, whilst this has altered how we deliver our Service, it has not changed our goals and principles. Our plan is also guided by the City Corporation's Corporate Plan 2018-23, the City & Hackney Joint Strategic Needs Assessment and The City Joint Health and Wellbeing Strategy; it is also informed by corporate planning for the recovery of the City in relation to COVID-19.

This year's Plan has three distinct phases; some of the planned initiatives can be completed quickly within these phases, others will need medium or long-term commitment and some still await the further development of Government policy on the pandemic.

Our main goals remain broadly the same as in previous years; to help ensure that:

- We promote and support a risk based, goal setting regulatory regime.
- Higher risk work activities are properly managed, employers are committed to developing healthier workplaces
- Food is hygienically prepared, safe to eat and what it says it is;
- We regulate in a way that supports businesses to comply and recover whilst not losing sight of the integrity and assurance of safe food for consumers and safe workplaces needing to be at the heart of what we do.

Principles

Our guiding principles are:

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

Resources, Service Delivery and recovery

We are acutely conscious of the longer-term impact of COVID-19 on our service and the need for having recovery plans ready to manage the backlog of outstanding interventions that will be due when restrictions are lifted. The FSA have stated that they will be seeking local authority input as they develop a recovery strategy for the UK food industry, including on how this can be reflected in future service plans.

We will ensure our officers continue to be safe and have limited any return to work in the initial stages utilising the advice given by Government. Any return to site work will focus on maintaining appropriate risk control measures but employees who are working effectively off-site are likely continue to do so at least in part going forward. Decisions about return to work in the City itself or working at home will be made gradually and deliberately, with a focus on productivity and effectiveness and developing a more flexible workforce in the long-term.

The issue of the impact of redeployment of resources to support contact tracing and other COVID-19 activities has been recognised as it developed over the initial months of the pandemic. We recognise the importance of these activities as part of the wider strategy for controlling the pandemic and are also conscious that ongoing changes as a result of COVID-19 potentially increase the risks to food safety and public health protection.

We have therefore assessed our approach as Government and local measures have developed including deploying resources to COVID-19 activities and in order to follow the direction Government requires, to support and guide businesses to operate safely.

Performance

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

This year's plan is split in to three distinct elements:-

Stage 1: Initial monitoring of businesses and activities posing the highest risks

Stage 2: Moving towards recovery

Stage 3: Return to a new normality

Stage 1: Initial monitoring of businesses and activities posing the highest risks

1st April to 17th April 2020

All planned food hygiene and food standards inspections were stopped on the direction of the FSA as priority was given to COVID-19 work and other urgent reactive work;

Stage 2: Moving towards recovery

The City of London Corporation as whole is supporting City businesses to recover from the effects of the pandemic and the Commercial Environmental Health Team can provide advice to City businesses on a wide range of Food Safety, Health & Safety, Pest Control and general trading matters, linking up with our colleagues in Trading Standards, Licensing and Pollution Control.

a) 18th April 2020 to 17th July 2020:

Most planned food hygiene, food standards interventions were further deferred by the FSA plus priority was given to COVID-19 recovery work and urgent reactive work

b) 18th July- 30th September 2020:

The focus during this period is now on resuming of further onsite interventions with high risk businesses where they are necessary after initial remote assessments.

Stage 3: Return to (a new) normality.

This final stage of Plan will see a return to more business as usual once Government has defined its policy for the next phase of the pandemic and as far as possible, we will be undertaking more planned proactive interventions and projects as set out below.

Throughout, businesses will be signposted to the City of London website which contains up-to-date links to the latest Government and professional institutions advice on dealing with the COVID-19 virus.

Stage 1: Monitoring of businesses and activities posing the highest risks**Key issues:**

- Infection control
- Phasing in of varying levels of lockdown

Activities

1. Proactively checking businesses with Food Hygiene Ratings of 0, 1 or 2 (so called 'less than broadly compliant') to:
 - a) verify if they are trading and
 - b) if they have started to operate delivery services or have introduced new processes to enable them to diversify their menu.
2. Proactive surveillance of local changes, such as setting up of community groups preparing meals, or established businesses changing what they do, such as pubs providing takeaway food. We have also focused on food provision to frontline services and vulnerable groups.
3. Proactive checking of businesses subject to COVID Closure requirements.
4. Contacting higher risk establishments where an intervention was due – this included where:-
 - a) food hygiene interventions due in Category A and B establishments (prescribed frequency of 6 and 12 months respectively)
 - b) food standards interventions due in Category A establishments (prescribed frequency 12 months)
 - c) All premises with cooling towers
 - d) establishments still trading where enforcement revisits were due
 - e) new businesses – where registration information provided raised concerns about a potential public or animal health risk; and
 - f) businesses notifying the local authority of a significant change in activities.
5. Following up on any food or feed incidents, normally notified to us by the FSA or other agencies.
6. Investigating possible (non COVID-19) outbreaks - e.g. related to gastroenteric organisms or Legionella.

7. Following up on any intelligence of change business activities that suggests a potential public health risk.
8. Addressing serious COVID-19-related public health risks using general Public Health, specific Coronavirus Regulation and where applicable health and safety law.
9. Advising and providing guidance on rat and other pest activity in the City following an increase in activity in open spaces.
10. Provide oversight of the Animal Bi-Products facility at Smithfield Market.
11. Provide support to the Superintendent at Billingsgate Market on hygiene and fish quality at that market.
12. Responding to complaints and service requests not dealt with above on a risk basis.

In the initial phase most interventions were undertaken remotely – i.e. an email and/or a telephone discussion and if necessary, a paper-based audit of relevant documentation.

If the discussion or documentation provided suggests that there may be a serious public health risk, an onsite visit would be made to assess and address those risks.

Stage 2: Moving towards recovery**Key issues:**

- Infection control
- Phasing in of varying measures with the easing lockdown
- Health & safety regulation is now recognised as an integral part of the response to COVID-19.

Activities as per Stage 1 but focused more on measures easing lockdown plus:

1. Capacity mapping considered for the Government's Test and Trace system; Environmental Health Practitioners are a key potential component of contact tracing especially at a local level.
2. Develop our health & safety 'COVID-secure' role by providing advice and guidance on the health & safety risk assessments undertaken by businesses that allowed to open / remain open and the control measures they need to put into place to protect their employees and the public.
3. Develop our website content to help signpost businesses to the most appropriate guidance for their setting.
4. Develop a checklist that businesses and our officers can use to assess the control measures a business has or requires and publish it on our website.
5. Contribute to the development of national guidance on COVID-19 related issues, including the control of Legionella, particularly in premises affected by closure and/or low occupancy.
6. Develop of a range of standard responses to COVID -secure enquiries we receive, with standard advice for our officers and template enforcement notices.
7. Continue with on-going proactive surveillance to obtain an accurate picture of the local business landscape.
8. Spot checks on COVID-secure compliance
9. Surveillance on all premises rated Cat A, B & non-compliant C for food hygiene and A for food standards, not already captured in Stage 1 with a remote surveillance intervention.

Stage 3: Return to a new normality: Planned programmed work

Some of the work in this phase may not commence due to the level of work being undertaken during Stage 2 above.

Objectives

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

Action	Activities	Outcome – Corporate Plan objectives are in bold	Responsibility
<p>2. Promote and support workplace health and wellbeing: Including the</p> <p><u>London Healthy Workplace Award</u> City Corporation Environmental Health Officers, where relevant, to advise on best practice and to signpost to support. Embed the enhanced Healthier Catering Commitment (HCC) Award scheme.</p>	<p>In October 2018 the City Corporation formally pledged to tackle obesity and promote healthier choices by signing the Local Government Declaration on Sugar Reduction and Healthier Food.</p> <p>As a result, we spent time developing an enhanced HCC scheme for food businesses in the City of London. We launched the scheme in 2019-20; we now need to develop and promote the initiative in relevant food establishments</p> <p>Maintain and enhance our links with the pan London development of HCC. Develop the HCC award in City premises.</p> <p>Work is part of the City & Hackney's Joint Health and Wellbeing Strategy, including mental health and is supported by the 'Business Healthy' initiative.</p> <p>Develop the <u>London Healthy Workplace Award</u> project with partners so the relevant best practice is available and signposted.</p> <p>Develop an app with <u>CityWell</u> for workplace mental health and wellbeing.</p>	<p>Outcome 2: People enjoy good health and wellbeing Outcome 8: We have access to the skills and talent we need.</p> <p>Evidence suggests a healthy workforce can reduce sickness absence, lower staff turnover and boost productivity -good for employers, workers and the wider economy.</p> <p>More food businesses are signed up to the HCC Award. Engagement with and buy in from, potential businesses using referral mechanisms, e.g. GLA Healthy Workplaces Charter Team, existing networks and resources such as Dept. of Community & Children Services Public Health Team and the Business Healthy initiative.</p>	<p>Assistant Director (Public Protection)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>

Action	Activities	Outcome – Corporate Plan objectives are in bold	Responsibility
<p>3. Primary Authority Partnership work¹.</p> <p><i>Primary Authority enables businesses to form a legal partnership with one local authority, which then provides assured and tailored advice on complying with environmental health, trading standards and other regulations that local regulators must respect.</i></p>	<p>The Regulatory Enforcement and Sanctions Act 2008, as amended by the Enterprise Act 2016 establish Primary Authority as a statutory scheme in which a local authority can partner with a business, or with a group of businesses, taking on responsibility for providing regulatory advice and guidance to them and for guiding the way in which they are regulated by all local authorities.</p> <p>In addition to our on-going Primary Authority Partnership work, a research report was previously commissioned to explore development of an enhanced Primary Authority offering and we will seek to further develop the recommendations and opportunities that flow from the report.</p> <p>Leverage positive business behaviour changes applying a targeted risk-based approach to providing advice and support to relevant businesses.</p> <p>Contribute to the development of London Partnership opportunities.</p>	<p>Outcome 6 (6a): we will promote regulatory confidence founded on the rule of law.</p> <p>Outcome 8: We have access to the skills and talent we need.</p> <p>Outcome 9: We are digitally and physically well connected and responsive.</p> <p>Outcome 10: We inspire enterprise, excellence, creativity and collaboration.</p> <p>Improved support for businesses and economic growth to enable them to better manage their key health, safety and food related risks.</p> <p>Ensuring progress towards the Government's better regulation agenda, providing streamlined and improved regulation.</p> <p>Increased Primary Authority work with Increased income and enhanced reputation for the City of London. Improved working with national and other regulators on the provision of specific advice.</p> <p>Businesses that sign up to a Primary Authority partnership have access to reliable, timely and tailored regulatory advice.</p>	<p>Assistant Director (Public Protection)</p> <p>Commercial EH Team Manager</p> <p>All Team Members</p>

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

Action	Activities	Outcome – Corporate Plan objectives are in bold	Responsibility
<p data-bbox="145 121 450 300">4. Further develop the Commercial EH Team in line with the agreed objectives.</p> <p data-bbox="197 347 421 488">Focus on our people and work in collaboration with others.</p> <p data-bbox="197 536 434 676">Produce training and development opportunities for peers.</p>	<p data-bbox="468 121 1010 188">Continue to develop and enhance the competency of our frontline professionals.</p> <p data-bbox="468 225 1061 327">Further develop our succession and workforce plan and embed the Corporate mechanisms designed to support this process.</p> <p data-bbox="468 363 1095 504">Develop further (suitable) training arrangements; job shadowing; mentoring and coaching; using the revised performance development approach in our Corporate appraisal process.</p> <p data-bbox="468 541 1055 608">Specific training will be developed in line with the FSA and HSE competency frameworks.</p> <p data-bbox="468 644 1066 785">Further develop agreed meat hygiene training for London authorities in association with peer organisations, allied universities and food professionals utilising Smithfield Market.</p> <p data-bbox="468 821 1095 850">Further develop health & safety training for peers</p> <p data-bbox="468 887 1048 1066">Continue to improve officers' awareness and understanding of business' needs, how to effectively communicate messages using a broad range of intervention strategies to influence the behaviour of organisations.</p>	<p data-bbox="1117 121 1778 188">Outcome 8: We have access to the skills and talent we need.</p> <p data-bbox="1117 225 1742 292">Outcome 9: We are digitally and physically well-connected and responsive.</p> <p data-bbox="1117 328 1727 395">Outcome 10: We inspire enterprise, excellence, creativity and collaboration</p> <p data-bbox="1117 432 1749 534">Our workforce is adequately resourced and experienced, enabling the service to fulfil our key objectives.</p> <p data-bbox="1117 571 1800 635">We have a more efficient service and improved staff morale, resulting in a better service for our customers.</p> <p data-bbox="1117 671 1765 812">We are, and we remain an excellent, modern and accountable regulator with improved staff morale focused on delivering a better service for our customers.</p> <p data-bbox="1117 849 1765 951">Our workforce will be well led and experienced, enabling the service to fulfil the objectives set now and for the foreseeable future.</p>	<p data-bbox="1834 121 2080 188">Assistant Director (Public Protection)</p> <p data-bbox="1834 225 2047 292">Commercial EH Team Manager</p> <p data-bbox="1834 328 2083 357">All Team Members</p>

Action	Activities	Outcome – Corporate Plan objectives are in bold	Responsibility
<p>5. Further develop IT and information management systems and capabilities and improve our online service offer. Build on lessons learned during the lockdown phase</p>	<p>Reduce the administrative and reporting burdens that we place on our front line, professionals, while improving for the longer term the information and intelligence we gather to aid our operational planning.</p> <p>Decide what time and attention is focussed on what areas to achieve the greatest benefit thus reducing the burden on compliant businesses.</p> <p>Work to improve our digital customer services streamlining both internal and external processes to everyone's advantage*.</p> <p>Continue the iterative delivery based on user and customer's needs; embed the approach, build capability and confidence and deliver services that enable users to excel. *</p>	<p>Outcome 9: We are digitally and physically well-connected and responsive. Faster data and information capture, improved intelligence and targeting enforcement, more effective communication with businesses.</p> <p>The existing Service delivers a streamlined, accessible format with a clear focus on customer requirements</p> <p>We will be better able to identify poor performing businesses and sectors.</p> <p>More 'open data' provision is considered.</p> <p>*Activities to include: Further Corporate website development; Online form (inc. payments); sign up to the new FSA food registration system; data gathering and development of data analytics (inc. the FSA work on performance management and segmentation); development of the Departments management information system (database)</p>	<p>Assistant Director (Public Protection)</p> <p>Commercial EH Team Manager</p> <p>Project Lead Officers</p>

The backbone of our normal regulatory work on food control was a targeted (risk-based) intervention program developed in accordance with the requirements of the Food Law Code. A significant proportion of planned food inspections are pushed back to at least 30th September so effectively we have not been able to deliver the expected planned programme in the first six months of this year. Our planned proactive intervention work will be informed by the FSA for as the national competent authority, they have produced regular directions to local authorities since the start of the COVID-19 pandemic

The table overleaf illustrates the past and present food hygiene rating profile of premises in the City of London. The requirements of this program are likely to evolve as we move towards more business as usual.

COMMERCIAL ENVIRONMENTAL HEALTH SERVICE PLAN 2020-2021

Rating profile Frequency of Hygiene Inspections	Total number of premises, year				FHRS Rating		
	2015-16	2016-17	2017-18	2018-19	FHRS	(2016-17) (2017-18) 2018-19	2019-2020
A rated 6 monthly inspection	27	15	17	17	0	(7) (5) 2	4
B rated Annually	114	123	108	143	1	(39) (30) 29	28
C rated 18 monthly	493	518	484	483	2	(76) (58) 42	49
D rated Every 2 years	802	872	837	855	3	(101) (960) 76	73
E rated = Every 3 years	321	372	362	353	4	(293) (271) 245	213
Unrated / awaiting inspection	35	34	41	58	5	(1224) (1259) 1290	1354
City Total	1792	1934 ²	1891	1909 ³	Awaiting inspection	(34) (41) 46	24
				231 (ceased trading)	Exempt, excluded etc.	(92) (90) 99	77
				251 (Businesses registered)	Rated FHRS 3 or better	(93) ⁴ (94.5) ⁵ 95.7	95.3%
					Total	(1866) (1850) 1829	1822

2 Includes premises that closed during the year

3 Includes establishments in Port Health Services area of responsibility

4 % Compliant 2016-2017

5 % Compliant 2017-2018

2. Food Standards inspections

All high-risk premises are rated in accordance with the intervention rating scheme in part 5 of the code; all others including any overdue inspections are picked up when the next relevant Food Hygiene intervention falls due.

Food Standards Inspections Rating and Frequency	Done 2015-16	Done 2016-17	Done 2017-18	Done 2018-2019	Done 2019-20	Due 2020-2021	Predicted commitment
A= Annually	1	0	1	0		1	-
B = Two yearly	78	97	73	79		183	-
C = Five yearly	373	240	252	290		459	-
Unrated	5	-		35		65	-
	-	-		-			-
Total	457	337	326	369		708	500 hours* ⁶

⁶ Estimate based upon previous years

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

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

Complaints & Service Requests	2019-2020	2018-19 ⁷	2017-18	2016-17	2015-16	Predicted commitment
		538	582	321	243	616 hours ⁸

4. Follow up enforcement action in food premises.

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

	2019-2020	2018-19	2017-18	2016-17	2015-16	2014-15	Predicted commitment
Letters with legal requirements	689	684	698	622	614	697	Inc. in Inspection Time quoted above.
Numbers of HIN's	2	3	5	5	10	15	7.5 per notice
Voluntary Closures	3	9	4	1	5	9	10 per premises
Emergency Prohibitions	1	0	0	1	1	0	70 hours per case Court action and case preparation are required. We seek to recover these costs
Legal Proceedings	0	0	0	0	0	0	2 weeks per case

⁷ This does not include Freedom of Information Act requests which a dealt with separately

⁸ Estimate based upon times spent on a sample (n=308) of 2018/19 requests

Action	Activities	Outcomes- Corporate Plan objectives are in bold	Responsibility
<p>5. Maintain support for the national Food Hygiene Rating Scheme (FHRS)</p> <p>We will continue to support the FHRS and the development of mandatory display.</p>	<p>It is important for consumer and business confidence that the FHRS system remains credible and objective; the central tenet of the scheme is our risk-based intervention programme.</p> <p>Consumers see mandatory display of ratings as a necessary part of any new regulatory model.</p> <p>We will consider slight adaptations to the national inspection scheme for lower risk premises and using competent but not fully authorised officers e.g. Environmental Health Graduates who are completing their Portfolio of Professional Practice.</p> <p>We will consider further FSA proposals in their modernising regulation programme .</p>	<p>Outcome 1: People are safe and feel safe. This is more important than ever as we emerge from the Coronavirus Pandemic and we look to support the recovery of compliant businesses – Outcome 5: Businesses are trusted and socially and environmentally responsible.</p> <p>Improvements in the number of businesses that meet minimum compliance levels and, in the number, evidencing ‘very good’ standards of compliance.</p> <p>We deliver the required (risk based) intervention programme outlined in this plan.</p> <p>Food Business Operators want a 5 FHRS rating, they achieve it and then show it by displaying their sticker enabling customers to see that food safety is a top priority and foremost in their minds.</p> <p>The further development of the re-rating scheme is supported in the City as FHRS itself moves towards alignment with the ones in the devolved Governments of Wales and Northern Ireland (where FHRS is mandatory).</p>	<p>Assistant Director (Public Protection)</p> <p>Commercial EH Team Manager</p>

COMMERCIAL ENVIRONMENTAL HEALTH TEAM SERVICE PLAN 2020-2021

Action	Activities	Outcomes- Corporate Plan objectives are in bold	Responsibility
<p>6. Focused activity on Food Businesses that are not compliant [in the lower tiers of FHRS (0, 1 & 2)]</p>	<p>Reinforce our intervention strategy with additional follow-ups, including visits and coaching sessions.</p> <p>Use agreed national food safety managements systems such as "Safe Food, Better Business" where these are appropriate. Use on-site inspection reports and mobile working systems.</p> <p>Support the use of ethical business regulation principles.</p> <p>Formal enforcement action will be informed by our current Policy Statement on Enforcement.</p>	<p>Outcome 1: People are safe and feel safe. This is more important than ever as we emerge from the Coronavirus Pandemic and we look to support the recovery of compliant businesses. Outcome 5: Businesses are trusted and socially and environmentally responsible.</p> <p>Action against food businesses that fail to fulfil their obligations. Improving standards in riskier food businesses.</p> <p>Reduction in the number of non-complaint food businesses through improved food hygiene performance and with the confidence this will be sustained.</p> <p>At the end of 2014-2015, 170 premises were rated 0,1 or 2 under FHRS and at the end of 2015-2016 it had fallen to 150. The number of non-compliant businesses has declined consistently over the years; at the end of 2018-19, it was down to 73 out of 1829 City food businesses (4%)</p>	<p>Assistant Director (Public Protection)</p> <p>Commercial EH Team Manager</p>
<p>7. Develop and implement a risk-based food sampling programme</p>	<p>Consider our Sampling Policy and local, regional and national priorities utilising all intelligence available.</p> <p>Exchange intelligence and findings on sampling results using relevant local and national intelligence, a key element to a robust system of Official Food Controls.</p> <p>If requested, we will acknowledge and respond to any originating local food authority, in</p>	<p>Outcome 1: People are safe and feel safe. This is more important than ever as we emerge from the Coronavirus Pandemic and we look to support the recovery of compliant businesses. Outcome 5: Businesses are trusted and socially and environmentally responsible.</p> <p>Delivery of a risk-based sampling programme. This work was scaled back in 2018-19 but the intention is to conduct further sampling work in 2019-2020, particularly where it supports other workstreams.</p>	<p>Commercial EH Team Manager</p> <p>Lead Sampling Officer</p>

COMMERCIAL ENVIRONMENTAL HEALTH TEAM SERVICE PLAN 2020-2021

	respect of inland referrals, confirming any action taken.	We comply with the FSA Data Standard for the collection of food and feed sampling intelligence.	
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COMMERCIAL ENVIRONMENTAL HEALTH TEAM SERVICE PLAN 2020-2021

Action	Activities	Outcomes- Corporate Plan objectives are in bold	Responsibility
<p>8. Work with the FSA on meat hygiene and standards and other initiatives at Smithfield Market.</p>	<p>Interventions including intelligence gathering exercises will be completed.</p> <p>Other initiatives included work on labelling and traceability and product recalls</p>	<p>Outcome 1: People are safe and feel safe. Outcome 5: Businesses are trusted and socially and environmentally responsible.</p> <p>That all meat and meat products that are traded through the market are cut stored, prepared and transport hygienically and safely and that there is traceability of all products from source to end-retailer</p>	<p>Assistant Director (Public Protection)</p> <p>Commercial EH Team Manager</p>
<p>9. Protect consumers from food fraud and as a result of food incidents / food recalls.</p>	<p>Consider the most appropriate means of disrupting and deterring criminal activity.</p> <p>Utilise the development of the intelligence Database, IDB within Environmental Health.</p>	<p>Outcome 1: People are safe and feel safe. This is more important than ever as we emerge from the Coronavirus Pandemic and we look to support the recovery of compliant businesses. Outcome 5: Businesses are trusted and socially and environmentally responsible.</p> <p>The selection of incidents for further investigation follows our current procedure which itself is informed by any specific criteria from national and co-regulators which we may be obliged to follow or consider.</p>	<p>Assistant Director (Public Protection)</p> <p>Commercial EH Team Manager</p>
<p>10. Investigate incidents of infectious disease and non-infectious environmental hazards.</p>	<p>Reactive investigations are conducted using our procedures and following the agreed Public Health England (PHE) protocols including those for Coronavirus contact tracing</p>	<p>Outcome 1: People are safe and feel safe. This is more important than ever as we emerge from the Coronavirus Pandemic and we look to support the recovery of compliant businesses Outcome 2: People enjoy good health and wellbeing. Outcome 5: Businesses are trusted and socially and environmentally responsible. Outcome 12: Spaces are secure, resilient and well maintained</p> <p>Incidents and notification from PHE are followed up</p>	<p>Assistant Director (Public Protection)</p> <p>Commercial EH Team Manager</p>

Health & Safety Objectives

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

Activity	Rationale for intervention: evidence identifying concern and priority- Corporate Plan objectives are in bold	Planned activity or resource
<p>1. Control of legionella: interventions in cooling towers and other at-risk water systems.</p> <p>2. Provision of related training / work experience / contribution to regulatory and educational community</p>	<p>Outcome 1: People are safe and feel safe. Outcome 2: People enjoy good health and wellbeing. Outcome 5: Businesses are trusted and socially and environmentally responsible. Outcome 12: Spaces are secure, resilient and well-maintained</p> <p>We currently have 136 cooling towers sites in the City⁹. Twenty-two are currently decommissioned and twenty-two are rated 'A' (high risk)</p> <p>Inspection of all our sites remains a local priority, which was previously endorsed by City of London's Port Health & Environmental Service Committee. The risk of a Legionnaires' disease outbreak affecting the Square Mile is considered an unacceptable public health and reputational risk, especially when compared with any perceived burden from our intervention activity.</p> <p>Cooling towers are being installed on new developments each year; We still note issues with the design of some new</p>	<p>Risk-based interventions due at 90 sites with cooling towers; revisits and enforcement action taken as necessary; and review status of decommissioned tower sites and follow up accordingly.</p> <p>90 sites at 5hrs per site = 450 hrs;</p> <p>Engagement with duty holders at new / proposed cooling tower sites: Advice to Principal Designers and Designers¹⁰ including at the pre-application or Planning Application stage of development.</p> <p>Estimated time: 70 hrs</p> <p>Attend quarterly meetings of Legionella Control Association</p> <p>Deliver training for inspectors on legionella and cooling towers (in conjunction with ALEHM and wider).</p> <p>*Builds on development of the revised London Boroughs' Legionella protocol and London Health Protection Teams,</p>

⁹ As at April 2019

¹⁰ Statutory responsibilities are set out in the Construction (Design & Management) Regulations 2015 <http://www.hse.gov.uk/construction/cdm/2015/commercial-clients.htm>

COMMERCIAL ENVIRONMENTAL HEALTH TEAM SERVICE PLAN 2020-2021

	<p>installations affecting Legionella risk and work at height, also a City Corporation priority.</p> <p>We have an established intervention protocol and a Cooling Tower Inspection mobile working app developed to aid our work.</p>	<p>Health Protection Teams' Standard Operating Procedure on Legionella outbreaks. HSE will also be involved.</p> <p>Review and refine the iAuditor Cooling Towers inspection pro forma and the use of data captured at interventions.</p> <p>Estimate time: 122.5hrs</p> <p><u>Estimated Total Time: 622.5 hrs</u></p>
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Activity	Rationale for intervention: evidence identifying concern and priority- Corporate Plan objectives are in bold	Planned activity or resource
<p>3. Falls from Height related to external building cleaning and servicing</p> <p><i>Building on valuable work carried out in 2014-19 and in response to demand from businesses and intermediaries.</i></p>	<p>Outcome 1: People are safe and feel safe. Outcome 5: Businesses are trusted and socially and environmentally responsible. Outcome 12: Spaces are secure, resilient and well-maintained</p> <p>Large number of sites where external Working at Height (WAH) is carried out.</p> <p>Local intelligence and observations indicate areas of concern and problems with compliance. This has been endorsed by others in the facilities management, 'access' design and operations community,</p> <p>Hazards and risks high: Poor practices, poor design, poor awareness by duty-holders: information from:</p> <ul style="list-style-type: none"> - Findings of advisory visits and training sessions; - views of reputable members of the building access industry through 1-2-1 discussions, meetings and training events. <p>Building managers usually keen to understand the risks and receptive to awareness raising - e.g. popularity of recent videos and face to face training we have provided</p>	<p>Continue to engage with policy makers such as the All-Party Parliamentary Group (APPG) on Working at Height.</p> <p>Reaching New Heights Forum established and initially Chaired by the City; now handed to the private sector but will continue to support the Forum</p> <p>Complete a number of further training events and briefings to interested parties (Facilities Managers, etc).</p> <p>Devise and deliver the project brief for a London-wide Commercial Estates project Phase 3 (see 5. Below).</p> <p><u>Estimated time= 210hrs</u></p>

Activity	Rationale for intervention: evidence identifying concern and priority- Corporate Plan objectives are in bold	Planned activity or resource
<p>4. Leisure Industry engagement- BEIS Primary Authority Forum</p>	<p>Outcome 1: People are safe and feel safe. Outcome 2: People enjoy good health and wellbeing. Outcome 5: Businesses are trusted and socially and environmentally responsible. Outcome 12: Spaces are secure, resilient and well-maintained</p> <p>Unlocking full potential- working with partners who share our aims</p> <p>We are founder members of the Leisure Expert Panel (LEP), an Industry group bringing together stakeholders in the delivery of health & safety outcomes in the Leisure Sector.</p> <p>There is a particularly high concentration of fitness service providers across range of budgets operating within Square Mile for which we have limited intelligence regarding individual compliance but gain trend data via networking and involvement with BEIS</p> <p>This is an Industry that has been hard hit by the Coronavirus measures</p>	<p>Develop links to the LEP and promote the industry through the BEIS Primary Authority Forum</p> <p>We hope to engage with wider groups, e.g. UKActive etc. this year and this might mean extra meetings</p>

Activity	Rationale for intervention: evidence identifying concern and priority- Corporate Plan objectives are in bold	Planned activity or resource
<p>5. All-London Borough Health & Safety Liaison Group (ALBHSLG)</p>	<p>Outcome 1: People are safe and feel safe. Outcome 2: People enjoy good health and wellbeing. Outcome 5: Businesses are trusted and socially and environmentally responsible. Outcome 12: Spaces are secure, resilient and well-maintained Working with partners who share our aims.</p> <p>Planned project activity was paused following Coronavirus measures</p> <p>The intervention programme was identified by an ALBHSLG tasking group with a focus on specific work activities in Commercial Estates. Data and intelligence were collated across all 33 London boroughs which resulted in two health & safety priority areas being identified for the project, namely asbestos (duty to manage) and work at height. Project development and training were supported by City of London. The project was delivered to Phase 2</p>	<p>Commercial Estates Project</p> <p>A joined-up, targeted and London-wide approach focused on duty-holders who own, operate or manage a range of properties or property portfolios for profit.</p> <ul style="list-style-type: none"> • Delivery of Phase 3 if the (pan London) project is able to restart due to COVID-19

Reactive interventions

Activity	Rationale for intervention: evidence identifying concern and priority- Corporate Plan objectives are in bold	Planned activity or resource
<p>1. Notifications under RIDDOR, LOLER and for Asbestos</p> <p>2. Complaints and service requests</p> <p>3. Massage and Special Treatment Licences</p>	<p>Outcome 1: People are safe and feel safe. Outcome 2: People enjoy good health and wellbeing. Outcome 5: Businesses are trusted and socially and environmentally responsible. Outcome 12: Spaces are secure, resilient and well-maintained</p> <p>Incidents / Accidents: decision to investigate in accordance with the Incident Selection Criteria Guidance LAC 22/13¹¹</p> <p>Evidence obtained during the investigation that health & safety management compliance by the duty holder is of concern across a range of higher risk activities.</p> <p>Massage and Special Treatment (MST) Licences – new premises inspections and annual licence renewal inspections</p>	<p>Initial enquiries: establishing or verifying key facts and further information to inform decision on whether to investigate further and if so to what extent</p> <p>Investigation and any follow-up enforcement action taken in accordance with the HSE's Enforcement Management Model (EMM)</p> <p>Accidents, Incidents, Notifications Estimated = 105 hrs</p> <p>All complaints, service requests and Notifications estimate = 70 hrs</p> <p>MST interventions: Estimated time = 55 hrs</p> <p><u>Estimated Total Time= 230hrs</u></p>

¹¹ Health & Safety Executive and Local Authorities Enforcement Liaison Committee (HELA) Incident Selection Criteria www.hse.gov.uk/lau/lacs/22-13