



**Environment Department  
Port Health & Public Protection Division  
Commercial Environmental Health Service Plan 2021-2023 (revised)**

## COMMERCIAL ENVIRONMENTAL HEALTH TEAM SERVICE PLAN 2021-2023 (revised)

### Foreword

This year's Service Plan updates previous Committee reports, it builds on the recovery planning processes laid out over the last two years. It also takes into consideration the Food Standards Agency (FSA) Recovery Plans for local authorities and the updates they have provided as the pandemic progressed.

The FSA Recovery Plan took effect from 1 July 2021 and runs through to April 2023 and beyond. The Plan focussed on re-starting the regulatory delivery system in line with the Food Law Codes of Practice for the highest risk establishments, while providing greater flexibility for lower risk establishments.

Phase 2 of the Recovery Plan came into effect from 1 October 2021, with key milestones for delivery by end March, June, September and December 2022 and March 2023. The planned food activities set out for the Commercial Environmental Health Team are in line with the activities and milestones set out in FSA Plan for the period from 1 July 2021 to 2023/24 including the expectation that we should move at a faster pace in realigning with the Code of Practice requirements where we are able.

In terms of the more detailed programme of work objectives for the whole team (i.e. not just food) this was last outlined in [our 2020-21 Service Plan](#). We are now in Stage 3 of the process in that plan; a return to (a new) normality. This latest version of the plan updates and refreshes the more detailed objectives and sets out what we plan to achieve in the coming year.

The City of London is also now in the final stages of realigning its services and implementing a new target operating model to enable substantial organisational efficiencies.

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

**May 2022**

### Introduction

The Commercial Environmental Health Team regulates food safety, occupational health and safety and some public health control arising from commercial businesses' activities for which we are the enforcing authority. The Environmental Health Practitioners within the team were uniquely placed to help deal with the crisis caused by the coronavirus (COVID-19) pandemic and in the next stages of 'Living with Covid'. The team remains involved in workstreams designed to help manage the process and to help facilitate recovery.

This plan has been prepared to accord with Food Standards Agency (FSA) and Health & Safety Executive (HSE) current frameworks on the planning and delivery of our services. The food framework remains subject of further potential change as the FSA develop the Achieving Business Compliance (ABC) programme; their Recovery Plan reflects the transitions that are occurring as we move towards Living with Covid and towards further potential change in the delivery of food controls. The delivery of our overall goals and principles remains key.

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.

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

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

Our team goals are that:

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

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Our guiding principles are:

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

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

The new target operating model is now being implemented across the City Corporation and we will consider the opportunities this presents.

We are now in Phase 2 of the FSA's recovery plan process and [Stage 3 of the Service Plan process envisaged for the team in 2020-21](#).

### **Stage 3: Return to (a new) normality.**

**This final stage of the Plan was all about the return to more business as usual. As far as possible undertaking more planned proactive interventions and projects; updated details are now set out below.**

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

Decisions about how and where we work have been made gradually and deliberately as the pandemic has progressed and now that we are 'Living with Covid'. There is also a focus on productivity and effectiveness and a view towards building a more flexible workforce.

### Performance and monitoring

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

The four-monthly Committee reports includes;

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

### Service Plan objectives

Our more detailed programme of work objectives for the Team was last outlined in [our 2020-21 Service Plan](#). **We are now in Stage 3 of the process** in that plan; **a return to (a new) normality**. This latest plan updates and refreshes the more detailed objectives and sets out what we plan to achieve in the coming year.

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Objective	Activities
<p><b>1. Manage the impacts as the regulatory landscape continues to evolve, including; any ongoing issues around Covid-19; EU Transition; the FSA's ABC Programme (formerly known as Regulating our Future); and our need to 'make adequate provision' for health and safety enforcement.</b></p>	<ul style="list-style-type: none"> <li>▪ Continue to evaluate the impact of proposed new Regulatory regimes.</li> <li>▪ Continue to explore and develop our strategic networking; lobby and inform relevant stakeholders of the perceived impact of proposed workstreams, the framework programme as a whole and its likely effect on PH&amp;PP and them.</li> <li>▪ Prepare and align the Commercial EH Team to new regulatory frameworks for the delivery of food and health and safety and where relevant public health*,</li> <li>▪ Strengthen and maintain long-term Member commitment to delivery of our duty as enforcers of workplace health &amp; safety.</li> </ul> <p>*Consider any further proposals for maintaining protection of public health during any transitions and now we are 'Living with Covid'.</p>
Outcome – Corporate Plan objectives are in <b>bold</b>	Responsibility
<p><b>Outcome 5: Businesses are trusted and socially and environmentally responsible.</b></p> <p><b>Outcome 6: The best legal and regulatory framework- (6b.) we will help promote regulatory confidence and influence UK policy and regulation to protect and grow the economy.</b></p> <p>The Commercial EH Team continues to be aligned to take advantage of relevant new regulatory frameworks and is structured and designed so that it;</p> <ul style="list-style-type: none"> <li>• is dynamic enough to keep pace with the changes;</li> <li>• can harness new technologies and;</li> <li>• can adapt to future circumstances.</li> </ul> <p>Publicly committed to the HSE / Local Authority Statement of Commitment on health &amp; safety regulation and embed the principles within this service plan.</p>	<p>Assistant Director (Commercial Services)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health &amp; Safety)</p>

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Objective	Activities
<p><b>2. Deliver official food controls.</b></p> <p>Meet the on-going expectations for Phase 2 of the <a href="#">FSA Local Authority Recovery Plan</a> and the <a href="#">Food Law Code of Practice</a></p> <p>Implement planned intervention programmes for high-risk category and non-compliant establishments in accordance with the timeline shown in <i>Table 1</i> below and in specific subordinate objectives and their activities, 2a-d below. Lower risk premises will be considered for interventions too.</p> <p>To improve hygiene and standards compliance and reduce risks by focusing activity where non-compliance is identified and by undertaking appropriate follow-up and enforcement action</p> <p>The FSA have indicated that, in essence, Phase 2 will continue until the FSA's plans for a new food standards delivery model and a revised food hygiene intervention rating scheme is in place.</p>	<ul style="list-style-type: none"> <li>• Official controls are undertaken where the nature and frequency are prescribed in specific legislation and official controls recommended by FSA guidance are undertaken to support trade and enable export</li> <li>• Reactive work including; enforcement in the case of non-compliance, managing food incidents and food hazards, and investigating and managing complaints</li> <li>• Sampling in accordance with the local authority sampling programme or as required in the context of assessing food business compliance, and any follow-up necessary in relation to the FSA Surveillance Sampling Programme</li> <li>• Ongoing proactive surveillance to obtain an accurate picture of the local business landscape and to; identify open/closed/recently re-opened/new businesses; as well as businesses where there has been a change of operation, activities, or food business operator.</li> <li>• Prioritisation of 'new businesses' for intervention based on risk.</li> <li>• Responding to FHRS requested re-visits in line with the timelines specified in the FHRS Brand Standard for England.</li> </ul>
Outcome – Corporate Plan objectives are in <b>bold</b>	Responsibility
<p><b>Outcome 1: People are safe and feel safe.</b></p> <p><b>Outcome 5: Businesses are trusted and socially and environmentally responsible</b></p> <ul style="list-style-type: none"> <li>▪ We improve hygiene and standards compliance and reduce risks by focusing activity where non-compliance is identified and by undertaking appropriate follow-up and enforcement action</li> <li>▪ Receive and investigate appropriately all requests for service, food incidents and complaints about food and food premises.</li> <li>▪ Ongoing proactive surveillance to obtain an accurate picture of the business landscape.</li> <li>▪ New businesses receive an appropriate and timely intervention.</li> <li>▪ Where the Recovery Plan requires, all establishments receive an onsite intervention and are thereafter back in the system for interventions in accordance with the Food Law Codes of Practice.</li> </ul>	<p>Assistant Director (Commercial Services)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health &amp; Safety)</p>

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Table 1- FSA Recovery Plan; Phase 1 & 2- [FSA Board paper](#)



## COMMERCIAL ENVIRONMENTAL HEALTH TEAM SERVICE PLAN 2021-2023 (revised)

<b>Objective</b>				<b>Activities</b>
<b>2a: Appropriate food hygiene interventions are completed. New and refreshed food hygiene ratings are given [where possible*].</b>				<ul style="list-style-type: none"> <li>▪ The Table in this objective shows all the hygiene inspections due to year end 2022-23. The figures in red are higher risk premises for which an intervention is required in Phase 2.</li> <li>▪ All higher risk establishments receive an onsite intervention and are thereafter back in the system for interventions in accordance with the Food Law Codes of Practice.</li> <li>▪ New premises receive an appropriate intervention within 28 days of registration (or opening). This will be triaged if other higher risk work is required</li> <li>▪ Lower (rated) risk premises are brought back into the programme and appropriate on-site interventions are completed where this is possible; the focus will be on larger/complex D rated establishments.</li> <li>▪ We will consider the use of Alternative Enforcement Strategies to gather intelligence/information on all lower risk establishments – this includes those in category D - broadly compliant or better (FHRS 3, 4 or 5) for hygiene, and category B for standards.</li> <li>▪ When intelligence suggests risks have increased (irrespective of the risk category) we will undertake interventions to assess and address those risks</li> <li>▪ The new requirements on allergen labelling for products prepacked for direct sale will be considered at appropriate hygiene interventions rather than any separate food standards intervention. There are a limited number of higher risk standards inspections required in the Recovery Plan.</li> </ul> <p><b>[*Where an appropriate inspection/audit intervention has been completed].</b></p>
<b>Category</b>	<b>Due to end March 2022</b>	<b>Due April 22- March 23</b>	<b>TOTAL</b>	
New (unrated)	38	Unknown	<b>38 (minimum)</b>	
<b>A</b> (*due every 6 months)	0	2	<b>2*</b>	
<b>B</b> (*due every 12 months)	8	32	<b>40*</b>	
<b>C</b> (less than broadly compliant)	5	4	<b>9</b>	
<b>C</b>	188	71	<b>259</b>	
<b>D</b>	638	65	703	
<b>D</b> (less than broadly compliant)	1	0	<b>1</b>	
<b>E</b>	101	127	228	
<b>Outcome</b>				<b>Responsibility</b>
<ul style="list-style-type: none"> <li>▪ Complete the required risk-based food hygiene interventions:</li> <li>▪ All establishments in Phase 2 of the FSA Recovery Plan receive an onsite intervention per the above timetable</li> <li>▪ Higher risk new premises receive an intervention within 28 days of registration (or opening).</li> <li>▪ Target &gt;90% of other food establishments selected for an intervention are completed.</li> </ul>				Assistant Director (Commercial Services) Commercial EH Team Manager Lead Officers (Food Safety and Health & Safety)

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Objective	Activities	
<p><b>2b: Focused follow up activity is conducted in food businesses that are not compliant [in the lower tiers of FHRS (0, 1 &amp; 2)]</b></p> <p>This is more important than ever as we emerge from the Coronavirus Pandemic, and we look to support the recovery of compliant businesses and protect consumers from non-compliant establishments</p>	<ul style="list-style-type: none"> <li>▪ Reinforce our intervention strategy with additional follow-ups, including visits, coaching and advice.</li> <li>▪ Use agreed national food safety managements systems such as "Safer Food, Better Business" where these are appropriate. Use on-site inspection reports and mobile working systems. Support the use of ethical business regulation principles.</li> <li>▪ Formal enforcement action will be informed by our current Policy Statement on Enforcement.</li> </ul>	
Outcome –	Responsibility	
<ul style="list-style-type: none"> <li>▪ Action is taken against food businesses that fail to fulfil their obligations.</li> <li>▪ Improving standards in riskier food businesses.</li> <li>▪ Reduction in the number of non-complaint food businesses through improved food hygiene performance and with the confidence this will be sustained.</li> </ul>	<p>Assistant Director (Commercial Services) Commercial EH Team Manager Lead Officers (Food Safety and Health &amp; Safety)</p>	

Objective	Activities	
<p><b>2c: Maintain support for the national Food Hygiene Rating Scheme (FHRS)</b></p> <p>We will continue to support FHRS and any development of mandatory display and endeavour to complete interventions that enable an updated rating to be provided; keeping the system relevant for businesses and consumers.</p>	<ul style="list-style-type: none"> <li>▪ It is important for consumer and business confidence that the FHRS system remains credible and objective; <b>the central tenet of the scheme remains a risk-based intervention programme that meets the required FSA standard.</b></li> <li>▪ Consumers see mandatory display of ratings as a necessary part of any new regulatory model. Our intervention work will therefore endeavour to continue to establish compliance even in lower risk premises.</li> <li>▪ We will therefore consider adaptations to the FSA Recovery Plan to accelerate interventions in lower risk premises to ensure they remain compliant. This will include interventions that allow formal rating, where this is possible.</li> <li>▪ We will support the re-rating visits according to <a href="#">the process outlined</a> on our website.</li> </ul>	

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Outcome	Responsibility
<ul style="list-style-type: none"> <li>▪ Improvements in the number of businesses that meet minimum compliance levels and, in the number, evidencing 'very good' standards of compliance.</li> <li>▪ We deliver the required (risk based) intervention programme outlined in this plan.</li> <li>▪ Food Business Operators want a 5 FHRs rating, they achieve it and then show it by displaying their sticker enabling customers to see that food safety is a top priority and foremost in their minds.</li> <li>▪ The further development of the re-rating scheme is supported in the City as FHRs itself moves towards alignment with the ones in the devolved Governments of Wales and Northern Ireland (where FHRs is mandatory).</li> </ul>	<p>Assistant Director (Commercial Services)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health &amp; Safety)</p>

Objective	Activities
<p><b>2d: Develop and implement a risk-based food sampling programme</b></p>	<ul style="list-style-type: none"> <li>▪ Consider our Sampling Policy and local, regional, and national priorities utilising all intelligence available.</li> <li>▪ Take part in relevant regional/national identified studies where we are able.</li> <li>▪ Exchange intelligence and findings on sampling results using relevant local and national intelligence, a key element to a robust system of Official Food Controls.</li> <li>▪ If requested, we will acknowledge and respond to any originating local food authority, in respect of inland referrals, confirming any action taken.</li> </ul>
Outcome	Responsibility
<ul style="list-style-type: none"> <li>▪ Delivery of a risk-based sampling programme. This work was drastically scaled back during the pandemic, but the intention is to conduct further sampling work in 2022-23 where it supports other workstreams.</li> <li>▪ We comply with the FSA Data Standard for the collection of food and feed sampling intelligence.</li> <li>▪ Contribute to relevant sampling projects selected by UKHSA and the public analyst services.</li> </ul>	<p>Assistant Director (Commercial Services)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health &amp; Safety)</p>

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Objective	Activities
<p><b>3. Ensure adequate arrangements are in place for the enforcement of health and safety.</b></p> <p><b>Focus on duty-holder business and activities where risks are highest</b></p> <p>Section 18(4) of the Health and Safety at Work Act etc. 1974 places a duty on Local Authorities to make 'adequate arrangements for the enforcement' of health and safety and the Code sets out what is meant by 'adequate arrangements for enforcement'.</p> <p><b>Consider activities in the sectors identified in <a href="#">LAC 67/2 (rev 11)</a>;</b> Setting Local Authority Priorities and Targeting Interventions including local intelligence.</p> <p><b>Subordinate objectives and their activities are outlined in 3a-f below</b></p>	<ul style="list-style-type: none"> <li>▪ Planned proactive health and safety interventions which focus on national priority topics;</li> <li>▪ Undertaking targeted initiatives based on local intelligence and evidence of risk;</li> <li>▪ Evidence-based education of employers, employees and contractors through guidance and information;</li> <li>▪ Promoting proportionate and sensible health and safety through business engagement and partnership working;</li> <li>▪ Undertaking and participating in health and safety promotion campaigns;</li> <li>▪ Working with and liaising with other internal stakeholders and external organisations</li> <li>▪ Devising material to help businesses comply with the law and promote good practice</li> </ul>
<b>Outcome – Corporate Plan objectives are in bold</b>	<b>Responsibility</b>
<p><b>Outcome 1: People are safe and feel safe.</b>  <b>Outcome 2: People enjoy good health and wellbeing.</b>  <b>Outcome 5: Businesses are trusted and socially and environmentally responsible.</b></p> <ul style="list-style-type: none"> <li>▪ <b>Planned interventions are evidence based.</b> Proactive inspection are only used for the activities in the sectors contained in the list of priority topic areas which is embodied in the National Code and <a href="#">LAC 67/2 (rev 11)</a>, or where there is local intelligence of failure to manage risk or for making it a specific local priority..</li> <li>▪ All reactive and proactive work is underpinned by local, regional, and national liaison. An appropriate mechanism for ensuring consistency between enforcers, for sharing good practice, for sharing information and for informing other enforcers of potential difficult situations</li> </ul>	<p>Assistant Director (Commercial Services)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health &amp; Safety)</p>

## COMMERCIAL ENVIRONMENTAL HEALTH TEAM SERVICE PLAN 2021-2023 (revised)

Objective	Activities
<p><b>3a; Management of legionella in cooling towers.</b></p> <p>A Local Priority and Targeting Interventions including local intelligence. The risk of a Legionnaires' disease outbreak affecting the Square Mile is considered an unacceptable public health and reputational risk, especially when compared with any perceived burden from our intervention activity.</p> <p>One hundred and five sites are due an intervention in the period to end March 2023. Forty-three are in the higher risk categories and will receive an on-site intervention</p>	<ul style="list-style-type: none"> <li>▪ Proactive interventions are considered necessary based on local intelligence and following the considerable upheaval of the pandemic and potential impact on the management of legionella, e.g. building occupancy and use during various Lockdown iterations</li> <li>▪ Risk-based interventions at sites with cooling towers; revisits and enforcement action taken as necessary;</li> <li>▪ Review status of decommissioned tower sites and follow up accordingly.</li> <li>▪ Engagement with duty holders at new / proposed cooling tower sites: Advice to Principal Designers and Designers including at the pre-application or Planning Application stage of development.</li> <li>▪ Focus attention on sites that have:-               <ul style="list-style-type: none"> <li>○ not yet demonstrated the ability to manage their Legionella risk in a sustained manner, and includes new cooling towers / evaporative condensers; and/or</li> <li>○ relevant enforcement action in the last 5 years and have not yet demonstrated sustained control of Legionella risk.</li> </ul> </li> <li>▪ Legionella Control Association attend quarterly meetings</li> <li>▪ Deliver training for inspectors on legionella and cooling towers (in conjunction with ALEHM and wider).</li> <li>▪ Host / support further professional development events for the regulatory and public health community.</li> </ul>
Outcome –	Responsibility
<p><b>Planned interventions are evidence based for cooling tower systems.</b> Proactive inspections are a reliable means of intelligence gathering. This type of intervention remains broadly supported by duty-holders who value our input and oversight</p>	<p>Assistant Director (Commercial Services)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health &amp; Safety)</p>

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Objective	Activities	
<p><b>3b; Electrical safety in hospitality settings.</b> The Electricity at Work Regulation 1989 requires that any electrical equipment which has the potential to cause injury is maintained in a safe condition</p>	<ul style="list-style-type: none"> <li>▪ Consider matters of evident concern and raise at on site food hygiene interventions.</li> </ul>	
<b>Outcome –</b>		<b>Responsibility</b>
<p><b>Planned interventions are evidence based.</b> Proactive inspection are only be used for the activities in the sectors contained in the list of priority topic areas which is embodied in the National Code and <a href="#">LAC 67/2 (rev 11)</a>, or where there is local intelligence of failure to manage risk.</p>		<p>Assistant Director (Commercial Services)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health &amp; Safety)</p>
Objective	Activities	
<p><b>3c: Gas safety in commercial catering premises.</b>  The proper installation, maintenance and inspection by a competent Gas Safe registered engineer is essential to ensuring that staff and customers at commercial catering premises are protected from exposure to carbon monoxide gas.</p>	<ul style="list-style-type: none"> <li>▪ <b>Gas safety in commercial catering premises.</b> The proper installation, maintenance and inspection by a competent Gas Safe registered engineer is essential to ensuring that staff and customers at commercial catering premises are protected from exposure to carbon monoxide gas.</li> <li>▪ Continue to survey food premises likely to be using solid fuel appliances (at the time they become due for an on-site food hygiene inspection).</li> <li>▪ Follow-up enforcement in premises where there are matters of evident concern</li> </ul>	
<b>Outcome</b>		<b>Responsibility</b>
<p><b>Planned interventions are evidence based.</b> Proactive inspections are only be used for the activities in the sectors contained in the list of priority topic areas which is embodied in the National Code and <a href="#">LAC 67/2 (rev 11)</a>, or where there is local intelligence of failure to manage risk.</p>		<p>Assistant Director (Commercial Services)</p> <p>Commercial EH Team Manager</p>

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	Lead Officers (Food Safety and Health & Safety)
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Objective	Activities
<p><b>3d: Crowd management &amp; injuries/fatalities to the public</b></p> <p>Event Safety / Crowd control at large scale public gatherings/ events remains a National Priority for 2022-23.</p> <p>The City Corporation host many high-profile events, and the City are also the enforcement authority for some of the larger higher risk events.</p>	<ul style="list-style-type: none"> <li>▪ Work with Licensing, Operational and Safety Planning Groups to better understand proposed event plans</li> <li>▪ Work as part of the City Corporation's Safety Advisory Group (SAG) to advise on and help promote risk management and good practice with event organisers.</li> <li>▪ Visits to events to verify the application of appropriate risk control measures.</li> <li>▪ Where necessary intelligence is shared between appropriate, e.g. City of London Police, London Fire, London Ambulance, City Corporation's Highways service.</li> </ul>
Outcome	Responsibility
<p>Lack of suitable planning, management and monitoring of the risks arising from crowd movement and behaviour as they arrive, leave, and move around a venue is addressed where this is necessary.</p>	<p>Assistant Director (Commercial Services)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health &amp; Safety)</p>

Objective	Activities
<p><b>3e: All London Borough Health &amp; Safety Liaison Group (ALBHSLG)</b></p> <p>Under LAC67/2 LAs should consider whether they can gain regulatory efficiencies by planning activity collectively e.g. with members of their local LA liaison groups.</p>	<ul style="list-style-type: none"> <li>▪ Any planned activity programme formulated by ALBHSLG for 2022-23 will be considered and resourced appropriately.</li> <li>▪ Work with relevant signatories of the Work-related deaths protocol to clarify and set demarcation arrangements and promote cooperation.</li> </ul>
Outcome	Responsibility

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<ul style="list-style-type: none"> <li>▪ Work with a potential range of agencies to develop partnership approaches that improve compliance and help duty-holders to manage health and safety.</li> </ul> <p><b>Note:</b> Planned project activity was paused following Coronavirus measures</p>	Assistant Director (Commercial Services)  Commercial EH Team Manager  Lead Officers (Food Safety and Health & Safety)
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Objective	Activities
<p><b>3f: Reactive health and safety interventions</b></p>	<ul style="list-style-type: none"> <li>▪ Investigating reported accidents, occupational diseases and dangerous occurrences that meet the appropriate criteria for follow up;</li> <li>▪ Responding to complaints and requests for service;</li> <li>▪ Permissioning work;                             <ul style="list-style-type: none"> <li>○ In MST premises (in liaison with Licensing colleagues);</li> <li>○ Asbestos notifications; and,</li> <li>○ Thorough examination (usually lift) reports;</li> </ul> </li> <li>▪ Responding to consultations, e.g. from Licensing;</li> <li>▪ Providing or signposting advice and information to duty holders;</li> <li>▪ Prioritised and targeted health and safety promotional campaigns.</li> </ul>
Outcome – Corporate Plan objectives are in <b>bold</b>	Responsibility
<ul style="list-style-type: none"> <li>▪ Incidents / Accidents: a decision to investigate is made in accordance with the appropriate <a href="#">Incident Selection Criteria Guidance LAC 22/13</a><sup>1</sup></li> <li>▪ Initial enquiries are completed to national guidelines: establishing or verifying key facts and further information to inform a decision on whether to investigate further and to what extent.</li> <li>▪ Investigation and any follow-up enforcement action is taken in accordance with the HSE guidelines including the Enforcement Management Model (EMM)</li> </ul>	Assistant Director (Commercial Services)  Commercial EH Team Manager  Lead Officers (Food Safety and Health & Safety)

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

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Objective	Activities
<p><b>4. Help promote and support the growth and successful delivery of workplace health and wellbeing in City businesses.</b></p> <p>Using:</p> <ul style="list-style-type: none"> <li>a. Promotion of the <a href="#">London Healthy Workplace Charter (external link)</a> a good practice framework aimed at improving the health and well-being of employees.</li> <li>b. Awareness raising of the work-related stress and mental health campaign 'Working Minds'</li> <li>c. The <a href="#">Healthier Catering Commitment (HCC)</a>, a voluntary scheme promoted by local authorities to help caterers and food businesses make simple, healthy improvements to their food. We spent time developing an enhanced HCC scheme for food businesses in the City of London and launched the scheme in 2019-20</li> </ul>	<ul style="list-style-type: none"> <li>▪ Encourage sign up to the community Business Healthy network.</li> <li>▪ Encourage development and use of the good practice framework for the workplace charter.</li> <li>▪ Raise awareness of the work-related stress and mental health campaign. This launched on 16th November 2021 and will run until the end of January 2023. The 'Working Minds' campaign is relevant to all businesses but is aimed particularly at SMEs and is encouraging employers and employees to use the five 'R' approach to: <ul style="list-style-type: none"> <li>○ make stress and mental health ROUTINE, as part of employee engagement</li> <li>○ REACH out to their colleagues,</li> <li>○ RECOGNISE the signs of stress,</li> <li>○ RESPOND to reduce the risk,</li> <li>○ REFLECT on how these experiences can be used to improve the workplace</li> </ul> </li> <li>▪ Following the pandemic we now need to reinvigorate the HCC scheme and develop and promote the initiative anew in relevant food establishments.</li> <li>▪ Where appropriate we will align this work with the evolving public health agenda (including regulation) on food.</li> <li>▪ Maintain and enhance our links with the pan London development of HCC.</li> </ul>
<p><b>Outcome – Corporate Plan objectives are in bold</b></p> <p><b>Outcome 2: People enjoy good health and wellbeing</b></p> <p>In October 2018, the City Corporation formally pledged to tackle obesity and promote healthier choices by signing the <b>Local Government Declaration on Sugar Reduction and Healthier Food</b>. Evidence suggests a healthy workforce can reduce sickness absence, lower staff turnover and boost productivity -good for employers, workers, and the wider economy.</p> <p>More food businesses are signed up to the HCC Award.</p>	<p><b>Responsibility</b></p> <p>Assistant Director (Commercial Services)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health &amp; Safety)</p>

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

## COMMERCIAL ENVIRONMENTAL HEALTH TEAM SERVICE PLAN 2021-2023 (revised)

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

## COMMERCIAL ENVIRONMENTAL HEALTH TEAM SERVICE PLAN 2021-2023 (revised)

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