

Appendix 1



**Environment Department
Port Health & Public Protection Division
Commercial Environmental Health Service Plan 2024-25**

Foreword

This year's Service Plan updates previous plans and takes into consideration further developments from the Food Standards Agency (FSA) regarding local authority delivery plans for food controls and updates on their Achieving Business Compliance (ABC) modernisation programme. The Plan also utilises the updated Health and Safety Executive (HSE) guidance on setting priorities and targeting interventions for health and safety, with a renewed emphasis on health.

The FSA have determined that official food control delivery should be set to meet the full requirements of the updated Food Law Code of Practice (the Code).

In line with the Code, we will continue to focus resource on the highest risk establishments, while considering the greater flexibility offered for lower risk establishments. When we consider the delivery of interventions, we will be mindful of the national changes but also what is appropriate for our local businesses, visitors and residents.

The wider context has changed significantly too, with the implementation of the Borders Target Operating Model that introduces a new border control regime for imported food and feed from the EU, the new regime will have implications for both Port Health and inland authorities.

In terms of our more detailed programme of work objectives for the whole Commercial Environmental Health team (i.e. not just food) these are outlined in further detail in this Service Plan. The plan updates and refreshes our objectives and sets out how we plan to achieve them this coming year.

Gavin Stedman
Port Health & Public Protection Director

May 2024

Introduction

The Commercial Environmental Health Team regulates food safety, occupational health and safety and some public health controls arising from commercial businesses' activities for which we are the enforcing authority.

This plan has been prepared to accord with Food Standards Agency's (FSA) and Health & Safety Executive's (HSE) current frameworks on the planning and delivery of our services. The food intervention framework remains subject of further change as the FSA effects the modernisation programme, known as Achieving Business Compliance (ABC); the pandemic Recovery Plans reflect the transitions to new intervention delivery models for both food standards and food hygiene.

The delivery of our overall team goals and guiding principles will consider the various changes in these delivery models; the new food standards model is expected to be introduced this service year and details on the requirements of the food hygiene model are also expected. The current health and safety delivery model is driven by LAC 67-2 (revision 13)

<https://www.hse.gov.uk/lau/assets/docs/67-2-priorities-targeting-interventions.pdf>.

Our plan is now guided by the City Corporation's newly developed Corporate Plan 2024-29; the strategic outcomes in this new Corporate Plan will be embedded and reflected within our processes to ensure that there is a 'golden thread' through everything we do. Our plan will be guided by the revised Health and Wellbeing Strategy, the City's first [People Strategy](#) and the Digital Strategy as these are developed.

There are six corporate outcomes in the new Corporate Plan; a more detailed breakdown of each, with context setting, overarching objectives and performance measures are expected as the Corporate Plan develops and they will be considered in our service delivery. The intention to bring to life a golden thread, embedding the Corporate outcomes in this Plan and how it is delivered.

The six Corporate outcomes are...

- [Providing Excellent Services](#) – Helping to protect and promote public, animal and environmental health and consumer protection including at our borders.
- [Vibrant Thriving Destination](#)- "Attracting businesses and people to a safe, secure, and dynamic location is vital to our future." Example Performance measure FHRS ratings improvement.
- [Dynamic Economic Growth](#)- 'Ensure that the City has the safest, most secure business environment'.

- [Diverse Engaged Communities](#)- "Across our residents, workers, businesses, and visitors, everyone should feel that they belong. Connecting people of all ages and backgrounds will help build diverse, engaged communities that are involved in co-creating great services and outcomes."
- [Flourishing Public Spaces](#)- Contributing to a vibrant commercial offer.
- [Leading Sustainable 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 where necessary evolve, 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.

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 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 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?

- We are now in a transition phase to new intervention delivery models for food. The FSA recognised that during this period there would be a significant amount of work for LAs and the FSA to undertake in preparation.

- We have introduced a new management information system which went live in 2023-24 but Officers in the team remain involved in developing its use; this will be developed further as FSA requirements become clearer and the City Corporation imbeds its own Data Strategy and revised performance measures.
- Revisions to the food standards intervention model will be incorporated to enable the operation of the new standards risk matrix this year and to capture the revised data that will be required for reporting and KPIs.
- We will explore optimal methods for gathering data related to our regulated activities to develop a comprehensive dataset that will inform our enforcement activity. This will also allow us to monitor & analyse our effectiveness.
- Decisions about how and where we work will be made in accordance with the City Corporation's People Strategy, focusing on productivity & effectiveness, whilst maintaining a flexible, dynamic & responsive workforce.

Performance management 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, as part of the regular oversight of our work.

Service Plan objectives

Our more detailed programme of work objectives for the Team are set out below.

Objective	Activities
<p>1. Manage the impacts as the regulatory landscape continues to evolve, including; ongoing issues around; the FSA's ABC Programme; and our need to 'make adequate provision' for health and safety enforcement.</p>	<ul style="list-style-type: none"> ▪ Continue to evaluate the impact of proposed new Regulatory regimes. ▪ 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. ▪ 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, ▪ Strengthen and maintain long-term Member commitment to delivery of our duty as enforcers of workplace health & safety.
Outcome – Corporate Plan objectives are in bold	Responsibility
<p>Providing Excellent Services Vibrant Thriving Destination- Dynamic Economic Growth</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"> • is dynamic enough to keep pace with the changes; • can harness new technologies and; • can adapt to future circumstances. <p>Publicly committed to the HSE / Local Authority Statement of Commitment on health & safety regulation and embed the principles within this service plan.</p>	<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>

Objective	Activities
<p>2. Deliver official food controls.</p> <p>Meet the revised service delivery expectations for LAs. An FSA Board Paper in 2023 highlighted continuing challenges for Local Authority service delivery, authorities are told to return to the interventions and intervals outlined in the Food Law Code of Practice but these have also changed and evolved</p> <p>Continue to prioritise planned interventions for high-risk category and non-compliant establishments in specific subordinate objectives and their activities. Lower risk premises will be returned to the programme using the revised guidance from FSA.</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>Manage any transition to the new food standards delivery model and plan similarly for any further revisions to food hygiene model.</p>	<ul style="list-style-type: none"> • 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 • Reactive work including; enforcement in the case of non-compliance, managing food incidents and food hazards, and investigating and managing complaints • 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 • 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. • Prioritisation of 'new businesses' for intervention based on risk. • Responding to FHRS requested re-visits in line with the timelines specified in the FHRS Brand Standard for England.
Outcome – Corporate Plan objectives are in bold	Responsibility
<p>Providing Excellent Services Vibrant Thriving Destination Dynamic Economic Growth</p> <ul style="list-style-type: none"> ▪ 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. ▪ Receive and investigate appropriately all requests for service, food incidents and complaints about food and food premises. ▪ Ongoing proactive surveillance to obtain an accurate picture of the business landscape. ▪ New businesses receive an appropriate and timely intervention. ▪ Where required establishments receive an onsite intervention and are thereafter back in the system for interventions in accordance with the Food Law Codes of Practice. 	<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>

Objective			Activities																																
<p>2a: Appropriate food hygiene interventions are completed. New and refreshed food hygiene ratings are given [where possible*].</p> <table border="1"> <thead> <tr> <th rowspan="2">Category</th> <th colspan="2">Interventions</th> </tr> <tr> <th>Due to 2024-25</th> <th>Done 2023-24</th> </tr> </thead> <tbody> <tr> <td>New (unrated)</td> <td>40</td> <td>176</td> </tr> <tr> <td>A (*due every 6 months)</td> <td>7</td> <td>10</td> </tr> <tr> <td>B (*due every 12 months)</td> <td>61</td> <td>25</td> </tr> <tr> <td>C (less than broadly compliant)</td> <td>21</td> <td>14</td> </tr> <tr> <td>C</td> <td>203</td> <td>148</td> </tr> <tr> <td>D</td> <td>557</td> <td>291</td> </tr> <tr> <td>D (less than broadly compliant)</td> <td>2</td> <td>4</td> </tr> <tr> <td>E</td> <td>187</td> <td>164</td> </tr> <tr> <td>Total</td> <td>1078</td> <td>683</td> </tr> </tbody> </table>			Category	Interventions		Due to 2024-25	Done 2023-24	New (unrated)	40	176	A (*due every 6 months)	7	10	B (*due every 12 months)	61	25	C (less than broadly compliant)	21	14	C	203	148	D	557	291	D (less than broadly compliant)	2	4	E	187	164	Total	1078	683	<ul style="list-style-type: none"> ▪ The Table in this objective shows all the hygiene inspections due to year end 2024-25. ▪ All higher risk establishments receive an onsite intervention in accordance with the Food Law Codes of Practice. ▪ New premises receive an appropriate intervention within 28 days of registration (or opening). This will be triaged if other higher risk work is required. ▪ Lower (rated) risk premises continue to be 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. ▪ We will use Alternative Enforcement Strategies and other interventions 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. ▪ When intelligence suggests risks have increased (irrespective of the risk category) we will undertake interventions to assess and address those risks The requirements on allergen labelling for products prepacked for direct sale will be considered at appropriate hygiene interventions rather than any separate food standards intervention. [*Where an appropriate inspection/audit intervention has been completed].
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<ul style="list-style-type: none"> ▪ Complete the required risk-based food hygiene interventions: ▪ Higher risk new premises receive an intervention within 28 days of registration (or opening) or as triaged. ▪ Target >90% of other food establishments selected for an intervention are completed. 			<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food; H&S)</p>																																

COMMERCIAL ENVIRONMENTAL HEALTH SERVICE PLAN 2024-2025

Objective	Activities	
<p>2b: Focused follow up activity is conducted in food businesses that are not compliant [in the lower tiers of FHRS (0, 1 & 2)]</p> <p>We look to support compliant businesses and protect customers from non-compliant businesses.</p>	<ul style="list-style-type: none"> ▪ Reinforce our intervention strategy with additional follow-ups, including visits, coaching and advice. ▪ 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. ▪ Formal enforcement action will be informed by our current Policy Statement on Enforcement. 	
Outcome –		Responsibility
<ul style="list-style-type: none"> ▪ Action is taken against food businesses that fail to fulfil their obligations. ▪ Improving standards in riskier food businesses. ▪ Reduction in the number of non-complaint food businesses through improved food hygiene performance and with the confidence this will be sustained. 		Assistant Director (Regulation and Compliance) Commercial EH Team Manager Lead Officers (Food Safety and Health & Safety)

Objective	Activities	
<p>2c: Appropriate food standards interventions are completed.</p> <p>We are responsible for verifying compliance with food law in the majority of food business establishments.</p> <p>The FSA anticipate that the new food standards model will help better target LA resources towards the highest risks. The new model is set to ensure that the frequency of food standards controls is based on a better understanding of the level of risk a food business poses.</p>	<ul style="list-style-type: none"> ▪ The backbone of our regulatory work remains a targeted (risk-based) intervention program developed in accordance with national requirements. ▪ All high-risk premises are rated in accordance with the existing intervention rating scheme in the Food Law Code; all others including any overdue inspections are picked up when the next relevant Food Hygiene intervention falls due. ▪ Introduce use of the new food standards rating system as soon as possible ▪ Reinforce our intervention strategy with additional follow-ups, including visits, coaching and advice. Formal enforcement action will be informed by our current Policy Statement on Enforcement. 	
Outcome –		Responsibility
<ul style="list-style-type: none"> ▪ Action is taken against food businesses that fail to fulfil their obligations. ▪ Improving standards in riskier food businesses. 		Assistant Director (Regulation and Compliance) Commercial EH Team Manager

<ul style="list-style-type: none"> Reduction in the number of non-complaint food businesses through improved food standards performance and with the confidence this will be sustained. 	Lead Officers (Food Safety and Health & Safety).
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Objective	Activities																								
<p>2d: Maintain support for the national Food Hygiene Rating Scheme (FHRS)</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> <table border="1" data-bbox="163 624 1104 1082"> <thead> <tr> <th>FHRS Rating</th> <th>No premises</th> <th>Category, %</th> </tr> </thead> <tbody> <tr> <td>0</td> <td>4</td> <td rowspan="3">Non-compliant 3.3</td> </tr> <tr> <td>1</td> <td>13</td> </tr> <tr> <td>2</td> <td>34</td> </tr> <tr> <td>3</td> <td>52</td> <td>Broadly compliant 2.5</td> </tr> <tr> <td>4</td> <td>129</td> <td rowspan="2">Good or better 93.4</td> </tr> <tr> <td>5</td> <td>1328</td> </tr> <tr> <td>Unrated/outside program</td> <td>110</td> <td></td> </tr> <tr> <td>Total</td> <td>1670</td> <td></td> </tr> </tbody> </table>	FHRS Rating	No premises	Category, %	0	4	Non-compliant 3.3	1	13	2	34	3	52	Broadly compliant 2.5	4	129	Good or better 93.4	5	1328	Unrated/outside program	110		Total	1670		<ul style="list-style-type: none"> It is important for consumer and business confidence that the FHRS system remains credible and objective; the central tenet of the scheme remains a risk-based intervention programme that meets the required FSA standard. 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. We will therefore consider adaptations to our interventions to ensure lower risk premises remain compliant. This will include interventions that allow formal rating, where this is possible. We will support re-rating visits according to the process outlined on our website.
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<ul style="list-style-type: none"> Improvements in the number of businesses that meet minimum compliance levels and, in the number, evidencing 'very good' standards of compliance. We deliver the required (risk based) intervention programme outlined in this plan. 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. 	Assistant Director (Regulation and Compliance) Commercial EH Team Manager Lead Officers (Food Safety and Health & Safety)																								

<ul style="list-style-type: none"> 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). 	
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Objective	Activities
<p>2e: Develop and implement a risk-based food sampling programme.</p>	<ul style="list-style-type: none"> Consider our Sampling Policy and local, regional, and national priorities utilising all intelligence available. Take part in relevant regional/national identified studies where we are able. Exchange intelligence and findings on sampling results using relevant local and national intelligence, a key element to a robust system of Official Food Controls. If requested, we will acknowledge and respond to any originating local food authority, in respect of inland referrals, confirming any action taken.
Outcome	Responsibility
<ul style="list-style-type: none"> Delivery of a risk-based sampling programme. This work was drastically scaled back during the pandemic and has still not been fully reinvigorated. We comply with the FSA Data Standard for the collection of food and feed sampling intelligence. Contribute to relevant sampling projects selected by UKHSA and the public analyst services. 	<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>

Objective	Activities
<p>3. Ensure adequate arrangements are in place for the enforcement of health and safety.</p> <p>Focus on duty-holder business and activities where risks are highest.</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>Consider activities in the sectors identified in LAC 67/2 (rev 13); Setting Local Authority Priorities and Targeting Interventions including local intelligence.</p> <p>Subordinate objectives and their activities are outlined in 3a-f below</p>	<ul style="list-style-type: none"> ▪ Planned proactive health and safety interventions which focus on national priority topics; ▪ Undertaking targeted initiatives based on local intelligence and evidence of risk; ▪ Evidence-based education of employers, employees and contractors through guidance and information; ▪ Promoting proportionate and sensible health and safety through business engagement and partnership working; ▪ Undertaking and participating in health and safety promotion campaigns; ▪ Working with and liaising with other internal stakeholders and external organisations ▪ Devising material to help businesses comply with the law and promote good practice
Outcome – Corporate Plan objectives are in bold	Responsibility
<p><u>Providing Excellent Services</u> <u>Vibrant Thriving Destination-</u> <u>Dynamic Economic Growth</u> <u>Diverse Engaged Communities</u></p> <ul style="list-style-type: none"> ▪ Planned interventions are evidence based. Proactive inspections 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 LAC 67/2 (rev 13), or where there is local intelligence of failure to manage risk or for making it a specific local priority. ▪ 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 	<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>

COMMERCIAL ENVIRONMENTAL HEALTH SERVICE PLAN 2024-2025

Objective	Activities	
<p>3a; Management of legionella in cooling towers.</p> <p>In 2024-25 Cooling towers located in built-up areas are a considered by HSE as appropriate for interventions in the revised LAC 67/2 (rev 13)</p> <p>At a local level 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>66 sites are due an intervention in the period to end March 2025. 23 are in the higher risk categories and will receive an on-site intervention</p>	<ul style="list-style-type: none"> ▪ 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. ▪ Risk-based interventions at sites with cooling towers; revisits and enforcement action taken as necessary; ▪ Review status of decommissioned tower sites and follow up accordingly. ▪ 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. ▪ Focus attention on sites that have: - <ul style="list-style-type: none"> ○ not yet demonstrated the ability to manage their Legionella risk in a sustained manner, and includes new cooling towers / evaporative condensers; and/or ○ relevant enforcement action in the last 5 years and have not yet demonstrated sustained control of Legionella risk. ▪ Legionella Control Association attend quarterly meetings. ▪ Deliver training for inspectors on legionella and cooling towers (in conjunction with ALEHM and wider). ▪ Host / support further professional development events for the regulatory and public health community. 	
Outcome –	Responsibility	
<p>Planned interventions are evidence based for cooling tower systems. 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 (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>	

Objective	Activities	
<p>3b; Electrical safety in hospitality settings. 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"> ▪ Consider matters of evident concern and raise at on site food hygiene interventions. 	
Outcome –	Responsibility	
<p>Planned interventions are evidence based. 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 LAC 67/2 (rev 13), or where there is local intelligence of failure to manage risk.</p>	<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>	

Objective	Activities	
<p>3c: Gas safety in commercial catering premises. 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"> ▪ Gas safety in commercial catering premises. 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. ▪ 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). ▪ Follow-up enforcement in premises where there are matters of evident concern 	
Outcome	Responsibility	
<p>Planned interventions are evidence based. 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 LAC 67/2 (rev 13) , 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 & Safety)</p>	

COMMERCIAL ENVIRONMENTAL HEALTH SERVICE PLAN 2024-2025

Objective	Activities	
<p>3d: Crowd management & injuries/fatalities to the public</p> <p>Event Safety / Crowd control at large scale public gatherings/ events remains a priority.</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"> ▪ Work with Licensing, Operational and Safety Planning Groups to better understand proposed event plans. ▪ 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. ▪ Visits to events to verify the application of appropriate risk control measures. ▪ Where necessary intelligence is shared between appropriate stakeholders, e.g. City of London Police, London Fire, London Ambulance, City Corporation's Highways service. 	
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 (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>	

Objective	Activities	
<p>3e: All London Borough Health & Safety Liaison Group (ALBHSLG)</p> <p>Under LAC 67/2 (rev 13) 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"> ▪ Any planned activity programme formulated by ALBHSLG for 2024-25 will be considered and resourced appropriately. 	
Outcome	Responsibility	
<ul style="list-style-type: none"> ▪ Work with a potential range of agencies to develop partnership approaches that improve compliance and help duty-holders to manage health and safety. <p>Note: Planned project activity was paused following Coronavirus measures</p>	<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>	

Objective	Activities	
<p>3f: Reactive health and safety interventions</p>	<ul style="list-style-type: none"> ▪ Investigating reported accidents, occupational diseases and dangerous occurrences that meet the appropriate criteria for follow up; ▪ Responding to complaints and requests for service; ▪ Permissioning work; <ul style="list-style-type: none"> ○ In MST premises (in liaison with Licensing colleagues); ○ Asbestos notifications; and, ○ Thorough examination (usually lift) reports; ▪ Responding to consultations, e.g. from Licensing; ▪ Providing or signposting advice and information to duty holders; ▪ Prioritised and targeted health and safety promotional campaigns. 	
<p>Outcome – Corporate Plan objectives are in bold</p>	<p>Responsibility</p>	
<ul style="list-style-type: none"> ▪ Incidents / Accidents: a decision to investigate is made in accordance with the appropriate Incident Selection Criteria Guidance LAC 22/13¹ or using revised criteria that is expected to appear this year ▪ 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. ▪ Investigation and any follow-up enforcement action is taken in accordance with the HSE guidelines including the Enforcement Management Model (EMM) 	<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>	

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

Objective	Activities
<p>4. Help promote and support the growth and successful delivery of workplace health and wellbeing in City businesses.</p> <p>Where appropriate we will align this work with the evolving public health agenda (including regulation).</p>	<ul style="list-style-type: none"> ▪ Encourage sign up to the community Business Healthy network. ▪ Encourage development and use of the good practice framework for the workplace charter. ▪ Raise awareness of the work-related stress and mental health campaign. Signpost the 'Working Minds' campaign which 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"> ○ make stress and mental health ROUTINE, as part of employee engagement ○ REACH out to their colleagues, ○ RECOGNISE the signs of stress, ○ RESPOND to reduce the risk, ○ REFLECT on how these experiences can be used to improve the workplace. ▪ Signpost and encourage use of the helpful resources including the SIT tool, management standards and risk assessments. ▪ We still need to reinvigorate the HCC scheme and develop and promote the initiative anew in relevant food establishments. ▪ Maintain and enhance our links with the pan London development of HCC.
Outcome – Corporate Plan objectives are in bold	Responsibility
<p>Diverse Engaged Communities</p> <p>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.</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. 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>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>

Objective	Activities
<p>5. Develop Primary Authority Partnership work.</p> <p>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.</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"> ▪ Pursue our on-going Primary Authority Partnership (PAP) work, where benefits remain for the partnership. ▪ Consider further PAPs where this is likely to be a good fit and we have the capacity and resource to help make the difference. ▪ The enhanced development of our Primary Authority offering was not pursued but we remain active in the development of individual partnerships and with the development of regional and sector specific national PA groups.
<p>Outcome – Corporate Plan objectives are in bold</p>	
<p><u>Providing Excellent Services</u> <u>Vibrant Thriving Destination-</u> <u>Dynamic Economic Growth</u> <u>Diverse Engaged Communities</u></p> <ul style="list-style-type: none"> ▪ Improved support for businesses and economic growth to enable them to better manage their key health, safety, and food related risks. ▪ Ensuring progress towards the Government's better regulation agenda, providing streamlined and improved regulation. ▪ 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. ▪ Businesses that sign up to a Primary Authority partnership have access to reliable, timely and tailored regulatory advice. 	<p>Responsibility</p> <p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>
Objective	Activities

<p>6. Further develop the Commercial EH Team in line with the agreed objectives.</p> <p>Focus on our people and work in collaboration with others. Produce training and development opportunities for peers.</p> <p>Accord with the City Corporation’s developing People Strategy</p>	<ul style="list-style-type: none"> ▪ Continue to develop and enhance the competency of our frontline professionals. ▪ Further develop our succession and workforce plan and embed the Corporate mechanisms designed to support this process. ▪ Develop further (suitable) training arrangements; job shadowing; mentoring and coaching using the developing People Strategy framework. ▪ Specific training will be developed in line with the FSA and HSE competency frameworks. ▪ Further develop health & safety training for peers ▪ 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.
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<p>Outcome – Corporate Plan objectives are in bold</p>	<p>Responsibility</p>
<p>Corporate Plan & People Strategy</p> <ul style="list-style-type: none"> ▪ Our workforce is adequately resourced and experienced, enabling the service to fulfil its key objectives. ▪ We have a more efficient service and improved staff morale, resulting in a better service for our customers. ▪ We are, and we remain an excellent, modern, and accountable regulator focused on delivering a better service. ▪ Our workforce will be well led and experienced, enabling the service to fulfil the objectives set now and for the foreseeable future. 	<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>

<p>Objective</p>	<p>Activities</p>
<p>7. Further develop IT and information management systems and capabilities and improve our online service offer.</p> <p>The new Environment Department has now moved to the IDOX Uniform back-office system which we continue to develop</p>	<ul style="list-style-type: none"> ▪ The project to replace the two current back-office systems with one shared Uniform system was completed in late April 2023. ▪ We will continue to work collectively with the relevant Module Administrators/ Key People in order to embed and develop Uniform so that it matches the desired business processes of the team.

	<ul style="list-style-type: none"> Work to further improve our digital customer services streamlining both internal and external processes to everyone's advantage*.
Outcome – Corporate Plan objectives are in bold	Responsibility
<p>Corporate Plan and the developing Digital Strategy will help provide the framework.</p> <ul style="list-style-type: none"> Faster data and information capture, improved intelligence and targeting enforcement, more effective communication with businesses. The existing Service delivers a streamlined, accessible format with a clear focus on customer requirements. 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. 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. More 'open data' provision is considered. *Activities still to include: Online form integrations with our MIS; further data gathering and development of data analytics (incorporating any FSA work on performance management); development and integration with the inspection and audit management system, Safety Culture. 	<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p> <p>Module Administrators (for the shared Uniform system)</p>