

**CITY OF LONDON CORPORATION
DEPARTMENT OF MARKETS & CONSUMER PROTECTION
PORT HEALTH & PUBLIC PROTECTION SERVICE
CITY OF LONDON FOOD SAFETY ENFORCEMENT PLAN 2014-15**



Introduction

At the City of London Corporation, official food controls are delivered by the Food Safety Team, the Smithfield Enforcement Team and the Port Health Service. All are part of the Port Health & Public Protection Service (PH&PP) which is itself part of the Department of Markets & Consumer Protection (M&CP). This Plan covers the work of the Food Safety and Smithfield Teams.

The food, catering and hospitality sectors make a significant contribution to City corporate life and to the wellbeing of residents, workers and visitors and the proper regulation of food safety within food businesses remains an important priority for the City.

The Corporate Plan¹ is the City of London Corporation's main strategic planning document providing a framework for the delivery of all services with three strategic aims. The City of London Corporation will support and promote the City of London as the world leader in international finance and business services, and will maintain high quality, accessible and responsive services benefiting its communities, neighbours, London and the nation.

The City of London outlines key plans for the future in a number of strategies according to the different areas of the City's work. These plans and strategies can be viewed on our website's sections on Corporate Governance and performance².

Our teams' plan is linked to these strategies through the M&CP Business Plan and our main goals are to help ensure that food is hygienically prepared, safe to eat and that whilst we will support businesses, we place the appropriate integrity and assurance of food safety and supply and the Consumer at the heart of what we do.

In March 2012, the Local Better Regulation Office (LBRO) (now Better Regulation Delivery office) published "Regulation and Growth"³ which highlighted:-

1 [The Corporate Plan 2013-2017](#)

2 [The City Corporation's Corporate Governance and Performance](#)

3 [Regulation and Growth, LBRO March 2012](#)

“....it is often the day-to-day experience of how regulation is delivered and enforced that matters most to businesses. It is at this level that regulators can develop their understanding of local businesses and build good relationships with them; assessing the risks that affect them, working with them to enable compliance and interacting in a way that builds confidence and trust ”.

This interaction is a central tenet of our Service and in performing the two teams' work, there is a need to strike a balance between support for businesses, especially smaller businesses, and protecting consumers and others from fraudulent and illegal practices.

There are currently 1727 food businesses registered with the City of London⁴ as being involved in the preparation, production, storage or sale of food⁵. The majority of these are shops, bars, restaurants or other types of catering establishments such as staff restaurants and corporate caterers or craft on the river. However, there are also an increasing number of temporary businesses, often registered elsewhere, that set up during various events and in outdoor spaces such as City church yards.

The City is home to Smithfield Market, the largest wholesale meat market in the UK and there are currently 46 trade premises operating from the Market in respect of which the City of London Corporation is the enforcing authority for food standards, with the Food Standards Agency is the primary enforcing authority for food hygiene at these premises.

This Plan aims to ensure that our enforcement remains targeted, proportionate, consistent and transparent, and sets out the framework for its delivery. It has been prepared as required by the FSA and in accordance with their "Food Law Enforcement Service Planning Guidance" and the content of the Plan provides the basis upon which the City Corporation's Food Safety Enforcement Service will be monitored and audited by the FSA.

Service Aims and Objectives

Through this plan, the Port Health & Public Protection (PH&PP) Service aims to ensure that:-

⁴ This excludes those food businesses which have remained with the Port Health Service for enforcement and which are generally situated in dock areas and/or adjacent to the river east of Greenwich

⁵ As of 6th April 2014 [Food Standards Agency - Food law code of practice](#)

- all food and drink that is produced, stored, or sold by food businesses within the City of London is hygienically prepared and safe to eat; and
- is described and labelled correctly

and this links to the Key Service Objectives for M&CP and PH&PP.

Objectives and plans

This Plan forms an appendix of the PH&PP's overall Business Plan for 2014-17 and the teams' main objectives are to :-

- Carry out regular inspections within City food businesses at a frequency determined by national risk criteria and local intelligence;
- Assist businesses in achieving legal compliance and good standards of food safety management through the provision of targeted advice, support and training;
- Investigate food poisoning outbreaks associated with City food businesses;
- Investigate serious complaints about food purchased in the City and complaints about City food premises;
- Undertake an annual food sampling programme in liaison with neighbouring authorities and colleagues in other agencies;
- Take appropriate and timely action in response to 'food alerts' issued by the FSA;
- Take appropriate enforcement action for failures to meet legal standards.

Scope of the Feed and Food Service

The Food Safety Team is responsible for enforcing legal requirements relating to food safety (standards and hygiene), occupational health and safety, statutory nuisances (other than noise) arising from commercial food businesses' activities and the investigation of food-related infectious diseases.

The Smithfield Enforcement Team is responsible for delivering food standards and health and safety interventions at Smithfield Market and ensures food hygiene is maintained in vehicles transporting product from the market. The team also oversees the processing and disposal of animal by-products produced on the market to prevent them from re-entering the human food chain. The Feedstuffs enforcement function in the City is carried out by the Trading Standards Team.

More details on the extent of the teams' work is reported in the sections following below which looks back on the work completed in recent years and what is planned for 2014-15. There are separate food enforcement activities in the Port Health Service and this has its own separate enforcement plan.

| Establishments profile: Registered food premises | | | |
|---|---------------------------------|----------------|----------------|
| Rating and Frequency of Food Hygiene Inspections (under Food Law Code) | Total number of premises | | |
| | 2011-12 | 2012-13 | 2013-14 |
| A rated = Inspected 6 monthly | 21 | 25 | 31 |
| B rated = Inspected annually | 98 | 103 | 135 |
| C rated = Inspected 18 months | 940 | 935 | 876 |
| D rated = Inspected 2 yearly | 214 | 213 | 265 |
| E rated = Inspected ever 3 years | 267 | 288 | 282 |
| Unrated / awaiting inspection | - | 21 | 37 |
| City Total | 1648 | 1660 | 1680 |
| Outside program | 72 | 75 | 57 |
| Approved food premises | (1) | (1) | 44 |
| | | | 1727 |

| Food Hygiene Rating Scheme (FHRS) Rating | Number Premises (inc Port Health) |
|---|--|
| 0 | 22 |
| 1 | 75 |
| 2 | 111 |
| 3 | 185 |
| 4 | 375 |
| 5 | 875 |
| Awaiting Inspection | 24 |
| Exempt, excluded etc | 80 |
| | 1747 (inc. Port Health) |

In addition to the inspections identified above, there are some 200 vehicles that transport product from Smithfield Market daily that are outside the inspection programme. These cannot be inspected at a set frequency due to their mobile nature but they are inspected periodically as part of an on-going joint project with the Food Standards Agency.

This work is monitored against the following Key performance Indicators (KPIs) which are reported to our Port Health & Environmental Services Committee three times a year in an Enforcement Activity Report.

Food Safety Enforcement Targets - Key Performance Indicators [KPI's]

| | |
|--|---|
| <ul style="list-style-type: none"> ▪ Secure a positive improvement in the overall FHRs ratings profile for City of London food establishments | <p>Baseline profile at 31st March 2013</p> |
| <ul style="list-style-type: none"> ▪ 75% food businesses inspected will receive a report/letter detailing the outcome of their inspection <u>within 5 working days</u> and the remainder <u>within 10 working days</u>. This will accord with standards within the FHRs system | <p>99.5% completed on target</p> |
| <ul style="list-style-type: none"> ▪ All authorised Food Safety staff to receive/complete the necessary professional development with <u>at least 10 hours</u> CPD on Food Safety tailored to delivery of this Enforcement Plan; and to complete their RDNA assessment | <p>Completed</p> |
| <ul style="list-style-type: none"> ▪ In 2014/15 risk rate 100% of Smithfield businesses in accordance with the FSA's Food Standards Risk Rating Scheme | <p>100%</p> |

Regulation Policy

The City Corporation is committed to the principles of the new Regulators' Code⁶, a statutory code for all regulators and PH&PP has its own [Policy Statement on Enforcement](#) which has been approved by the Port Health & Environmental Services Committee and sets out its approach to enforcement.

⁶ In force from 6th April 2014

Interventions at Food and Feeding stuff establishments

The City of London Food Safety Team inspects premises according to the FSA'S Food Law Code of Practice⁷. Inspections are based on risk and inspection frequencies calculated using Annex 5 of the Code and planned inspections at Smithfield are also based around the Code's Food Standards risk rating scheme. The details of our intervention work are outlined in the Service Work Plan section below.

Inspections primarily centre on risk based inspection and on follow up interventions which are determined on the extent of an establishment's legal compliance. Premises rated 0, 1 or 2 in the Food Hygiene Rating Scheme (FHRS) receive additional visits; this is based on work done with poor performing businesses in the City and elsewhere in the last few years which showed there was some success in maintaining or improving compliance through regular (face to face) contact. Follow up interventions are now also a requirement of the Food Law Code. The purpose of the additional interventions are two-fold; to support those willing to make improvements and to regularly monitor those who have previously been unable to maintain the required standards between routine inspections.

For the vast majority of other food businesses in the City, there remains an overlap between Food Hygiene and Food Standards work, making simultaneous inspections where they are due the best intervention option assisting both businesses, through minimising disruption and limiting multiple visits. This often means existing food businesses due a Food Hygiene inspection will be simultaneously inspected for Food Standards if such an inspection is due any time within the same year; this allows the service to use its resources more effectively and to focus more on dealing with the poorer performing businesses

Each new food business will receive a Food Hygiene and Food Standards intervention to assess their compliance with the relevant legislation. We will endeavour to do so within 28 days of their opening and then the business will be risk-rated to trigger future inspections at appropriate intervals and to determine any further appropriate intervention. The Teams also consider appropriate health & safety interventions during some food controls including those in new premises and this work is outlined in the current year's Health & Safety Intervention Plan for the City.

Officers carrying out Food Hygiene inspections will consider the appropriate application of the FSA's current *E. coli* guidance where this is applicable. We migrated to the new national FHRS in April 2012 and the Food Safety Team continues to promote the scheme, to ensure the public know how to determine how well a food business performs in relation to food hygiene.

⁷ There were revisions to the Food Law Code which became effective on 6th April 2014

Other interventions, those classed as not an audit or inspection, will continue and will include sampling visits and visits to check compliance after complaints and to check progress on implementing remedial action following an inspection. These are seen as a very important part of the service, especially in poor performing businesses, as they help ensure that standards are maintained and improved where required.

All team members are encouraged to identify new premises and report details to the Operational Support Team to ensure our premises intelligence remains current. Intelligence on new premises is also acquired from colleagues in other PH&PP teams - e.g. Licensing, Trading Standards - and other City departments – e.g. Planning, Building Control - as well as formally through new food business registrations.

Feed and Food Complaints

The Food Safety Team and Smithfield Enforcement Team will continue to respond to all complaints but decisions on the depth of investigations will be made according to whether:-

- food is suspected as causing food poisoning or does not satisfy food safety requirements;
- the City of London Corporation has enforcement responsibility; and
- It is suspected that there could be a significant breach of the law.

Views and information received from the FSA and Primary Authorities will also be taken into account when determining the extent and direction of any investigation.

Authorised officers and where appropriate the team managers make an assessment of the complaints to determine the most appropriate follow up action, with previous intelligence and compliance history are both being taken into account.

Feed complaints, if any, are investigated by Trading Standard but none were received in 2013-14. Several supermarket chains have now registered as feed premises as certain waste foods are now being recycled into the feed chain.

Home Authority Principle and Primary Authority Scheme

A Food Safety- related Primary Authority Partnership was signed with **Virgin Active**, the national health and fitness club chain in late 2012 and with **Harbour & Jones** , a contract and event catering company, in late 2013 and this will be developed during this current year.

Advice to Business

Food safety advice to businesses is an integral part of the service and forms a significant part of the discussions with food business operators at various times including at the design stage for new premises or refurbishments and during inspections and following other service requests. We are encouraging businesses to use web based resources to help answer initial enquiries they may have; these include ERWIN - Everything Regulation When It's Needed – a one-stop website for a range of regulatory information.

Not all food businesses consult directly prior to carrying out works and new developments and their associated permissioning processes in the City can be complex. The teams' endeavour to engage with these businesses through Planning, Building Control and Licensing services in order to advise and influence on food hygiene and health & safety believing this to be the best time to secure sustainable improvements through adequate investment.

Feed and Food Sampling

The City Corporation strives to be an active contributor to national and regional sampling programs and the sampling program is developed with its neighbours in the SE London Food Group and through the pan-London Food Co-ordinating Group. The group also takes advice and guidance from the Public Health England and the Public Analysts and a sampling plan is devised that considers the co-ordinated programs as well as locally important issues.

Samples are submitted to the Food Examiner or appointed Analyst as necessary for the selected projects or in response to specific complaints and there is a contingency fund for this work.

Control and Investigation of Outbreaks and Food Related Infectious Disease

The City Corporation is in the North East and North Central Health Protection Team (HPT)'s area and operates with the HPT to investigate outbreaks and selected infectious disease notifications.

Health Protection legislation in England was updated in April 2010 with measures now contained in the amended Public Health (Control of Disease) Act 1984 and accompanying Regulations. The legislation adopts an all hazards approach, and, in addition to the specified list of infectious diseases, there is a requirement to notify cases of other infections or contamination which could present a significant risk to human health. Local authorities have powers and duties to prevent and control risks to human health from infection or contamination, including by chemicals and radiation.

Feed / Food Safety Incidents

The service has arrangements in place to ensure that it is able to respond to Food Alerts issued by the FSA. Warnings are received electronically and all urgent Food Hazard Warnings receive immediate attention and action where necessary with staff able to be co-opted from other teams if necessary. Out of hours arrangements have altered since 2012-13 with managers now on call out of hours to facilitate priority work, including that involving pertinent food hazard alerts that require an urgent response.

Liaison with Other Organisations

The City is a member of the SE Sector London Boroughs Food Group and its representatives regularly attend meetings with the Director of Public Health and with the Consultants in Communicable Disease with the City acting as hosts for London Food Coordinating Group meetings and other events including a number for the Food Standards Agency. The Food Safety Team is also routinely involved in work with its Licensing colleagues and the City of London Police. For a number of years the City Corporation has maintained active links with the Better Regulation Delivery Office being involved with a number of Primary Authority arrangements and it has contributed to improvement and development work for local authority regulatory services at national level.

The Smithfield Enforcement Team works collaboratively with the Food Standards Agency to deliver food safety project work and with Billingsgate Seafood Training School and the University of Derby to deliver training to student Environmental Health Officers. Regular liaison is maintained with trade bodies such as the Smithfield Market Tenants Association and the FSA's contactor for hygiene enforcement at Smithfield Market.

Feed and Food Safety and Standards promotional work, and other non-official controls interventions

Joined up working and promotion of information is seen as important and the City Corporation encourages SMEs to seek advice and to utilise resources such as ERWIN. The Smithfield Enforcement Team will continue to deliver food safety education initiatives to operators of meat delivery vehicles in collaboration with the FSA.

Staff Development Plan

Staff development is managed through the City Corporation's Performance & Development Framework (P&DF) appraisal scheme. Specific assessments are used such as the Better Regulation Delivery Office (BRDO) Regulator's Development Needs Analysis (RDNA) tool and Continuing Professional Development (CPD) requirements for Food Officers and generally for Environmental Health Officers (EHOs) members of Chartered Institute of Environmental Health (CIEH) and Institute of Occupational Safety and Health (IOSH) etc., are taken into account. The main targets for training are on the delivery of this Plan and the development of staff competencies that can best achieve this. Value for money is considered and the best results have been achieved by engaging external trainers to deliver specific courses. Training records are kept for all staff.

Quality assessment and internal monitoring

Monitoring is by way of the City Corporation's annual P&DF appraisal scheme which links individual officers' work directly to this Plan and the overall aims and objectives of the organisation. These require preparation, a meeting, a six monthly follow-up and an end of year review [84 hours pa].

The workload monitoring process ties in with appraisal objectives and regular one-to-one meetings are held with officers to monitor how objectives are proceeding. These also consider all enforcement action taken and the officer's interaction with individual food businesses. As a signatory to the national Food Hygiene Rating Scheme, the City Corporation have further monitoring and consistency obligations to administer the safeguards of the scheme, [168 hours pa].

There are separate procedures for monitoring enforcement decisions, investigations and formal notices this time is incorporated in the following :-

- Regular (6 weekly) team meetings [112 hours pa]

- The Food Service contributes to the local Food Sector and H&S Quadrant work that reviews the arrangements that are in place to meet our service obligations. [72 hours pa Food, 17.5 hours pa H&S]

Review against the Service Plan for 2013-14

See the Service Plan below

Identification of any Variation from the Service Plan

See the Service Work Plan below

Areas of Improvement

See Service Development below

APPENDIX ONE - SERVICE PLAN

APPENDIX TWO - BACKGROUND

APPENDIX THREE - RESOURCES

APPENDIX ONE - SERVICE PLAN

| 1. Food Hygiene inspections | | | | | | | |
|--|---------------------------|----------------------------|---------------------|---------------------|---------------------|---------------------|------------------------------|
| <ul style="list-style-type: none"> ▪ Risk based targeted inspections, in accordance with the revised Food Law Code, including use of alternative controls and enforcement for compliance with Food Hygiene legislation. Target >90% of food premises due and any overdue for intervention:- New Premises to receive a full inspection within 28 days of registration (or opening). ▪ Manage the effective transfer of responsibility for river vessel food controls; now to be included in the City's programme having transferred from Port Health in their reorganisation | | | | | | | |
| Food Hygiene Inspections Rating and Frequency | <u>Due</u> 2014-15 | <u>Done</u> 2013-14 | Done 2012-13 | Done 2011-12 | Done 2010-11 | Done 2009-10 | Predicted commitment) |
| A rated = Inspected 6 monthly | 30 | 49 | 33 | 23 | 20 | 12 | 310 hours |
| B rated = Inspected annually | 124 | 133 | 98 | 81 | 77 | 70 | 654 hours |
| C rated = Inspected 18 months | 313 | 589 | 606 | 640 | 704 | 608 | 950 hours |
| D rated = Inspected 2 yearly | 392 | 128 | 141 | 67 | 114 | 65 | 980 hours |
| E rated = Inspected ever 3 years | 119 | 81 | 112 | 96 | 96 | 112 | 223 hours |
| Unrated / awaiting inspection | 33 | 36 | | 2 | | | |
| Totals | 1,011 | 980 | 990 | 909 | 1011 | 867 | 3,117 hours |
| Approved premises | - | (1)⁸ | (1) | (1) | (1) | (1) | - |

⁸ The premises at Smithfield Market, are approved as a cutting plant. Hygiene requirements are now enforced directly by the FSA whilst the City Corporation carries out interventions in relation to only food standards and related matters in the market.

In addition to the above, 540 inspections of delivery vehicles associated with Smithfield Market will be undertaken.

2. Food Standards inspections

Continue action plan as agreed with our Port Health & Environmental Services Committee for 2010-11 with all high risk premises rated and all others including any overdue inspections picked up when the relevant Food Hygiene intervention is due.

| Food Standards Inspections Rating and Frequency | Due 2014-15 | Done 2013-14 | Done 2012-13 | Done 2011-12 | Done 2010-11 | Done 2009-10 | Predicted commitment |
|--|--------------------|---------------------|---------------------|---------------------|---------------------|---------------------|-----------------------------|
| A= Annually | 1 | 1 | 1 | 0 | 0 | 1 | - |
| B = Two yearly | 36 | 94 | 36 | 18 | 80 | 57 | - |
| C = Five yearly | 281 | 206 | 214 | 292 | 443 | 376 | - |
| Unrated | 35 | 0 | 0 | 0 | 0 | 0 | - |
| Outstanding | 19 | 20 | 0 | 0 | 77 | 111 | - |
| Total | 372 | 301 | 251 | 298 | 523 | 545 | 350 hours |

3. Health and safety in food premises

Matters of evident concern are now only dealt with during official controls inspections and/or when reported to the Department through statutory notification requirements and deemed appropriate for further follow up under the National Local Authority Enforcement Code⁹

| | Due 2014-15 | Done 2013-14 | Done 2012-13 | Done 2011-12 | Done 2010-11 | Done 2009-10 | Predicted commitment |
|---|----------------|-------------------|-----------------|-----------------|-----------------|-----------------|------------------------------|
| Health and Safety interventions 'matters of evident concern' | - | - | - | 89 | 355 | 291 | 161 hours work ¹⁰ |
| Accidents | 100* | 103 ¹¹ | 85 | 95 | 104 | 155 | 50 hours work ¹² |
| LOLER/PUWER reports | 10* | 12 | 9 | 3 | 2 | 5 | ~10 hours work |

*estimated based upon previous years

4. 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 | 250* | 243 | 318 | 375 | 364 | 355 | 662 hours work |
|--|------|-----|-----|-----|-----|-----|----------------|

*estimated based upon previous years

⁹ [National Enforcement Code For Local Authorities - Health & Safety](#)

¹⁰ Previously based upon 1 Hour per inspection when combined with Food Hygiene; new premises likely to be similar, more serious reactive interventions will take longer. Average for the year 10 minutes per premises

¹¹ There are changes to both RIDDOR notifications and to HSE investigative criteria meaning that fewer incidents are likely to be reported and less investigated. See www.hse.gov.uk/lau/lacs/22-13.htm for details on incident selection criteria

¹² If no major investigative work is required following a serious accident etc.

5. 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

| | Estimated 2014-15 | Done 2013-14 | Done 2012-13 | Done 2011-12 | Done 2010-11 | Done 2009-10 | Predicted commitment |
|--|------------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|---------------------------------------|
| Letters with legal requirements | Similar to previous | 951 | 957 | 664 | 930 | 835 | Inc. in Inspection Time quoted above. |
| Numbers of HIN's | " | 14 | 17 | 19 | 27 | 35 | 112 hours |
| HSW Notices | " | 0 | 4 | 2 | 1 | 1 | Negligible<10 hours |
| Voluntary Closures | " | 6 | 2 | 3 | 3 | 1 | 42 hours |
| Emergency Prohibitions | " | 1 | 2 | 2 | 1 | 0 | 70 hours per case |
| Legal Proceedings | " | 0 | 1 | 1 | 3 | 1 | 147 hours per case |

| Work Activity | 2013-14 Review | 2014-15 Plan |
|---|--|--|
| <p>6. Devise and deliver the Annual food sampling program.</p> <ul style="list-style-type: none"> ▪ In accordance with the current Sampling Policy ▪ An annual commitment for the Teams selected from national and local sampling initiatives developed through recommendations from the London Food Coordinating Group and work in the SE London Food Group. ▪ The level of work to fit within the allotted (free) allocation of samples from HPA and our sampling budget for those consigned to the Public Analyst (see above). | <ul style="list-style-type: none"> ▪ Sampling Plan devised and delivered as planned with additional grant monies secured for work at Smithfield Market. ▪ Sample allocation from PHE (FWEM) completed ▪ Work planned through LFCG and FSA funded completed | <ul style="list-style-type: none"> ▪ Studies to be agreed as per Sampling Policy ▪ Sampling at Smithfield Market will focus on food authenticity and composition. FSA grant monies applied for as part of regional (LFCG) bid ▪ Some sampling will focus on businesses with poor compliance using previously devised protocols where appropriate. ▪ 250 hours work |
| <p>7. Continue to concentrate our presence with Food Businesses that are not compliant (in the lower tiers of the FHRS 0, 1 & 2)</p> <ul style="list-style-type: none"> ▪ Reinforcing the intervention strategy with additional follow up; revisits and coaching sessions as deemed necessary to improve food hygiene performance. ▪ Use agreed national food safety managements systems such as “<i>Safe Food, Better Business</i>” where | <ul style="list-style-type: none"> ▪ A number of food businesses were closed this year with most concerns related to pest activity. This was done using hygiene emergency powers. ▪ Closures afford the business the opportunity to focus on resolving the serious issues properly before they resume trade. ▪ The FSA funded additional work with poor performing take away businesses, see below. | <ul style="list-style-type: none"> ▪ The Food Safety Team will continue to focus more attention on food businesses that need to improve compliance. This is now enshrined in the revised Food Law Code. ▪ We have amended our inspection report forms and procedures to ensure follow up inspections are achieved in non- compliant premises. ▪ Part of follow up inspections will focus on compliance with the |

| Work Activity | 2013-14 Review | 2014-15 Plan |
|---|--|--|
| <p>these are appropriate.</p> <ul style="list-style-type: none"> ▪ Formal enforcement action is not precluded and this will be informed by our Policy Statement on Enforcement. | | <p>revised FSA <i>E Coli 0157</i> guidance (where this is appropriate).</p> <ul style="list-style-type: none"> ▪ The Teams will also consider poor performance with food standards legislation especially if this relates to issues of authenticity and provision of allergen information. ▪ 208 premises are 0,1 or 2 rated under FHRS (at April 2014) ▪ 1050 hours work ▪ SET Food Standards work 105 hrs |
| <p>8. Special Events; Trading outside;</p> <ul style="list-style-type: none"> ▪ Work with other City Departments on outside events. ▪ Catering at outdoor events is potentially a high risk activity whether at an established venue or market or at a temporary or mobile function. Potentially large numbers of people, frequent use of temporary staff, the temporary nature of the accommodation and high-risk products for sale place specific pressure on food safety management. ▪ Sampling surveys have indicated that outdoor events are vulnerable to food safety problems. ▪ Enhance the system for gathering intelligence on these events in | <ul style="list-style-type: none"> ▪ The formal policy on street trading is dependent on the outcome of legislation for street trading. ▪ The SAG¹³ was formed in 2011, with PH&PP represented, there was much improved coordination and communication for larger special events (that feed into the SAG process)*. ▪ Other smaller events and issues around trading outside are not always readily quantifiable; some events are not planned or not notified to the City Corporation. ▪ The landscape of street trading has evolved with still more public spaces now used to host temporary food events with markets now held on a regular basis at a number of | <ul style="list-style-type: none"> ▪ Legislation for the City of London on street trading has now been passed and the Street Trading procedures are being drafted for publication. ▪ * It is expected that the SAG type process will help with the coordination of food at many organised street events for which a temporary street trading license is applied for. ▪ The next round of audits of approved Guildhall caterers will be completed as part of the new tender process. ▪ We will continue to engage with the organisers of outside events (that take place on private land) to ensure that food businesses that come to the City are properly |

13 SAG - Safety Advisory Group for the City of London

| Work Activity | 2013-14 Review | 2014-15 Plan |
|--|---|--|
| <p>advance.</p> <ul style="list-style-type: none"> ▪ Gather information and comment to the relevant duty holders ▪ Visits sites as necessary with follow-up action taken where required ▪ Contribute to the auditing of caterers on the Remembrancer's approved list. | <p>locations.</p> <ul style="list-style-type: none"> ▪ We try to maintain established contacts with the organisers of these events. ▪ "Pop up" style vendors now receive public acclaim in parts of London and contribute to a vibrant street scene. Properly vetted these vendors add value to the street scene. ▪ We have looked at the performance of Guildhall caterers at catered events. | <p>scrutinised.</p> <ul style="list-style-type: none"> ▪ 150 hours work |
| <p>9. The main provisions of the new EC FIC Regulations come into force in December 2014; this legislation will be enacted in England by FIR. Businesses in some circumstances will need to consider both the information and labelling they provide to customers. The idea that information is accurate and can enable consumers to make informed choices; some provision such as those for allergens have a direct impact on food safety not only standards.</p> | <ul style="list-style-type: none"> ▪ A number of training sessions have been attended to assist with the delivery of the new requirements ▪ The website is kept up to date with suitable information and links on the requirements. | <ul style="list-style-type: none"> ▪ We will concentrate on the provision of allergen advice in catering and on the general information requirements in FIC to help businesses understand the new requirements. ▪ We will promote the proper consideration of consumer information on allergens in catering particularly in small businesses. We will develop and signpost guidance at our inspections and on our own website ▪ Further training for relevant officers is planned on allergens and general FIC requirements ▪ 100 hours work |

| Work Activity | 2013-14 Review | 2014-15 Plan |
|---|---|--|
| <p>10. Changes to health and safety regulatory work in the new National Enforcement for Local Authorities for Health and Safety (the Code) will continue to be developed.</p> | <ul style="list-style-type: none"> ▪ The Teams proactive health and safety inspection work ceased in 2012-13; following Government direction to do so in all but the highest risk premises. ▪ Health and safety inspections now focus on matters of evident concern where these are identified during official food controls visits | <ul style="list-style-type: none"> ▪ The Code considers that matters of evident concern should continue to be raised with business and the team are likely to continue to come across these when performing official food controls ▪ The Code contains an Annex of activities and industry sectors where more proactive inspections can be considered including food related areas ▪ The Code does allow for the continued investigation of complaints and accidents. ▪ The details of health and safety work are reported further in the health and safety enforcement plan (and the anticipated times involved). |
| <p>11. The FSA's E coli guidance for businesses has been revised and is due to be published in early 2014/15</p> | <ul style="list-style-type: none"> ▪ n/a | <ul style="list-style-type: none"> ▪ The revised FSA guidance will be considered including the best way for it to be explained to smaller food business operators with no access to their own professional food advice. |
| <p>12. Continue to develop the programme to consolidate procedures and protocols to improve consistency of inspection, enforcement, advice, accuracy and consistency of record keeping and procedures.</p> | <ul style="list-style-type: none"> ▪ We continued to develop workable consistent processes and procedures. ▪ This included further development of our website and the information it contains and the advice it signposts. ▪ Procedures and protocols were | <ul style="list-style-type: none"> ▪ The UKFSS system will be developed further with the introduction of the new Desktop system. ▪ Legal proceedings work is underway coordinated through the PH&PP Director's Focus Group. ▪ Develop further training following |

| Work Activity | 2013-14 Review | 2014-15 Plan |
|--|---|--|
| <ul style="list-style-type: none"> ▪ Develop further work to improve consistency and effectiveness with reference to the revised Food Law Code and new legislation. | <p>developed for the FHRS system. We now receive more requests for re-ratings (where businesses have improved after an initial inspection.</p> <ul style="list-style-type: none"> ▪ Capacity building and training of staff were considered in the event of a serious food incident/crisis /infection affecting public health. ▪ The City adopted the UKFSS¹⁴ system for recording food and feed samples. This is a database that can be used by all local authorities and laboratories (the PHE¹⁵ and Public Analyst) ▪ The UKFSS system was used to report part of our required returns to the FSA but created problems with the data. | <p>the completion of the Performance & Development Appraisal for each Officer, their RDNA assessment and the specifics of this year's work program</p> <ul style="list-style-type: none"> ▪ Continue to develop our service content for the revised City Corporation website; |
| <p>13. Increase awareness and effectiveness of pest control management in food businesses.</p> <ul style="list-style-type: none"> ▪ Small food businesses still do not grasp the potential seriousness of pest activity and how quickly it can escalate; standard pest control contract work does not often properly address infestations. | <ul style="list-style-type: none"> ▪ Closures of food premises in 2013-14 all related, at least in part, to a failure to control pests. Pest control companies were also engaged before these closures were made. ▪ Lack of understanding and commitment to pest control management and active pest problems therefore continues to have a significant impact. | <ul style="list-style-type: none"> ▪ The Food Safety Team will continue to engage with food establishments during our inspections to emphasise the importance of good pest management. |

14 UKFSS- UK Food Surveillance Scheme See www.food.gov.uk/enforcement/monitoring/fss

15 Public Health England has a food water and environmental reference laboratory at Colindale which provides the City with microbiological services www.phe.org.uk/ProductsServices/InfectiousDiseases/RegionalMicrobiologyNetwork/FoodWaterEnvironmentalMicrobiologyServices/FWEColindale/

| Work Activity | 2013-14 Review | 2014-15 Plan |
|---|--|---|
| <p>14. Evaluate the City Corporation's commitment to food hygiene training.</p> <ul style="list-style-type: none"> ▪ Training can help improve poor performance with better trained food handlers supporting businesses to meet their legal requirements, especially in relation to effective Food Safety Management Systems. | <ul style="list-style-type: none"> ▪ Businesses are currently directed to other providers for food hygiene courses. ▪ We consider specific assistance to food establishments to meet their food safety management duties. ▪ We completed an evaluation of preferred training provision with 50 small food business operators. This concluded that face to face training was often considered too expensive and inflexible with web-based training the favoured option as it was cheaper and easier to organise. ▪ The FSA financed further training with poor performing take away operators using NSF. | <ul style="list-style-type: none"> ▪ No further work is planned to set up specific food hygiene courses with businesses signposted to other training providers. ▪ The individual work with poor performers will continue and will include assistance with determining training and supervision commensurate with duties. ▪ Time included in the follow up work above. |
| <p>15. Commitment to the national Food Hygiene Rating Scheme (FHRS) in the City.</p> <ul style="list-style-type: none"> ▪ All Local Authorities have now adopted the single national scheme in England and Wales, with the scheme now backed by legislation in Wales and display mandatory. | <ul style="list-style-type: none"> ▪ It is hoped the FHRS rating scheme continues to be a success, contributing to an improvement in overall hygiene standards in businesses in our area and nationwide. ▪ We have however noticed a pronounced fluctuation in ratings in some premises and for the first time a reversal in the general trend in ratings improvement. Nearly 90% of our rated premises do however remain broadly compliant. | <ul style="list-style-type: none"> ▪ The City and Port Health food services will continue to embed the FHRS scheme. ▪ We will continue to encourage display of the rating sticker within premises <u>and</u> to promote the use of the FHRS rating website especially through mobile media – i.e. Apps http://ratings.food.gov.uk ▪ The FSA plan further work to promote the FHRS system and we will endeavour to support this locally to increase use and acceptance |

| Work Activity | 2013-14 Review | 2014-15 Plan |
|---|--|---|
| | <ul style="list-style-type: none"> ▪ Hygiene rating schemes provide consumers with published readily accessible information about hygiene standards in food premises operating in the City and beyond. ▪ We have noticed an increase in the number of requests for re-ratings where improvements have been made (and sustained) following initial inspections. | with businesses and the public. |
| <p>15. Work to improve our data gathering and intelligence systems and support national schemes.</p> <ul style="list-style-type: none"> ▪ Data management remains an important priority and must be considered under the FSA Framework Agreement. ▪ Data management is an important part of the FHR System and UKFSS¹⁶. | <ul style="list-style-type: none"> ▪ There was a further upgrade to the Northgate M3 system which has enabled easier use of the FHR System and ratings management. ▪ We continue to develop procedures that encompass the needs of all the (various) users of the PH&PP database with the Licensing Team now incorporated. ▪ SET are now using UKFSS for their sampling work. | <ul style="list-style-type: none"> ▪ Further development work is envisaged with Data Management. ▪ The use of UKFSS will be further developed and the UKFSS version 9 adopted. ▪ We will consider further how this system operates with our own database. ▪ 25 hours work |
| <p>16. Develop the Primary Authority Programme with existing and potential partner organisations.</p> | <ul style="list-style-type: none"> ▪ Work has developed with the fitness chain Virgin Active and another Primary Authority Partnership Agreement was signed with Harbour & Jones the contract and event caterers. | <ul style="list-style-type: none"> ▪ 75 hours work |

¹⁶ UKFSS- The Food Standards Agency UK Food Surveillance System

| Work Activity | 2013-14 Review | 2014-15 Plan |
|--|---|---|
| 17. Work collaboratively with the FSA on meat delivery vehicle initiatives (Smithfield Enforcement Team). | <ul style="list-style-type: none"> ▪ Developed educational food safety leaflet for food delivery vehicle operators. ▪ Consulted Smithfield Market Tenants Association | <ul style="list-style-type: none"> ▪ Deliver educational interventions |
| 18. Work in collaboration with the Food Standards Agency to deliver meat training for London authorities. (Smithfield Enforcement Team) | <ul style="list-style-type: none"> ▪ N/A | <ul style="list-style-type: none"> ▪ One day course with provisional syllabus set and facilities at LCM earmarked for use. |

APPENDIX TWO - BACKGROUND

Profile of the Local Authority

The City of London Corporation is an unusually diverse organisation that supports and promotes the City as the world's pre-eminent financial centre and provides local government and police services for the "Square Mile". It provides valued services to London and the nation as a whole including management of Guildhall Art Gallery, the Barbican Centre, the Central Criminal Court at the Old Bailey, 4,240 hectares of open space, three wholesale food markets and acts as London's Port Health Authority. The political and governance structures are not based on party politics and the City Corporation uses its own private funds to finance the promotional work it does on behalf of the UK-based financial and business services industry.

The City's working population is forecast to be around 350,000 with people working in many different business sectors but largely concentrated in finance, banking and the law. There are reminders of the City's past in the markets such as Smithfield and Leadenhall but other industries have grown to service the needs of the businesses and people who work in the City including the provision of food with over 17,000 working in accommodation and food services sectors.

Retail developments including food outlets are expanding in the City and 2010 saw the opening of the large New Change shopping complex with an increasingly diverse retail corridor being developed around it in Cheapside. Hotel developments continue to expand and there is a thriving night-time economy including world class venues such as the Barbican Centre and numerous bars and restaurants. The City has a small residential population currently around 9,000. The City is a popular destination for visitors, especially around St Paul's Cathedral and there are estimated to be over 10,000 visitors each day to the City.

Organisational Structure

The Food Safety Team is located on the 'commercial' side of PH&PP and the team is managed by a Food Safety Team Manager whose work is dedicated to food enforcement and who reports to an Assistant Director (Public Protection). The Smithfield Enforcement Team is managed by a Principal Environmental Health officer who reports directly to the Port Health & Public Protection Service Director.

The Food Safety Team is located at Walbrook Wharf, 78-83 Upper Thames Street, London, EC4R 3TD and the Smithfield Enforcement Team at 202 Poultry Market, Smithfield. The food team's office reception is open from 8am to 6pm each day

but we only occasionally receive callers (unless by pre-arranged appointment). Smithfield office is open from 4am to 1pm daily and the animal by-product facility is open between 6am and mid-day.

Access to services is largely by telephone, e-mail, via the City Corporation's web site and the City Corporation's Contact Centre or through our own proactive inspections on site. Field enforcement officers normally work between the hours of 8am to 6pm. Smithfield officers work between 4am and 11am. In the event of an 'out of hours' emergency senior managers are all contactable via telephone. Food safety information is displayed on the City Corporation's website: www.cityoflondon.gov.uk

APPENDIX THREE - RESOURCES

Finance

The 2013-14 budget was £466,000 including income from various work streams where charges or costs were applicable. In 2014-15 the net planned expenditure before any income is £478,000. In 2013-14 the local risk expenditure for the Smithfield Enforcement team was £360,000 net; in 2014-15, the planned local risk expenditure is £327,000 net.

Legal provision for enforcement action is part-funded locally from the Team's budget and part centrally through the Comptroller & City Solicitor's department, with counsel engaged for any prosecutions.

Staffing

The Food Safety Team Manager is responsible for day-to-day operations of the Food Safety Team comprising seven Environmental Health Officers (EHOs) and reporting to an Assistant Director (Public Protection).

The Smithfield Enforcement Team is managed by a Principal Environmental Health Officer and consists of 2 Authorised Officers and 1 Porter. The Principal Officer reports directly to the Port Health and Public Protection Director.

This is also an Operational Support Team that administers the Northgate M3 PP database system for PH&PP, adding new premises, registrations and reporting/data extraction.

| Food Safety Team | FTE | Smithfield Enforcement Team | FTE |
|-----------------------------|------------|------------------------------------|------------|
| 1x Food Safety Team Manager | 1.0 | 1 x Principal Officer | 1.0 |
| 7 x EHO posts | 6.45 | 2 x Authorised Officers | 1.7 |
| 1 x AD Commercial | 0.25 | 1 x Porter | 1.0 |
| 9 | 7.7 | 5 | 3.7 |