



**CITY OF LONDON CORPORATION
DEPARTMENT OF MARKETS & CONSUMER PROTECTION
PORT HEALTH & PUBLIC PROTECTION SERVICE
CITY OF LONDON FOOD SAFETY ENFORCEMENT PLAN 2015-16**

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 acting as the London Port Health Authority (LPHA). 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 Enforcement Teams; a separate plan covers the food safety work of the LPHA.

The food, catering and hospitality sectors all make a significant contribution to the corporate life of the City of London 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 City Corporation outlines its key plans for the future in a number of strategies according to the different areas of the City's work all of which can be viewed on our website¹.

The Corporate Plan² is the City of London Corporation's main strategic planning document providing a framework for the delivery of all services with three strategic aims and the City Corporation will continue to 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.

¹ [The City Corporation's Corporate Governance and Performance](#)

² [The Corporate Plan 2013-2017](#)

The City of London Corporation

Our teams' plans are 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.

Government guidance published on "Regulation and Growth" highlighted that:-

"....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. In performing the Food Safety and Smithfield Enforcement 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 around 1770 food businesses registered with the City of London³ as being involved in the preparation, production, storage or sale of food⁴. The majority of these are shops, bars, restaurants or other types of catering establishments such as staff restaurants and corporate caterers or tourist pleasure craft on the river. There are also a continuing number of temporary businesses, often registered elsewhere, that set up during various events and in outdoor spaces such as City churchyards and at "pop up" or "street markets".

The City is also 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 being 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

³ 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

⁴ As of 6th April 2014 [Food Standards Agency - Food law code of practice](#)

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 we:-

- protect public health from risks which may arise in connection with the consumption of food, including risks caused by the way in which it is produced or supplied and otherwise;
- protect the interests of consumers in relation to food so that all food sold is as described and is labelled correctly

Objectives and plans

This Plan forms an appendix of the PH&PP's overall Business Plan for 2015-2018 and the teams' main objectives are to :-

- carry out targeted inspections within City food businesses as 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 advice, support and training;
- investigate food poisoning outbreaks and incidents associated with City 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; and
- take appropriate enforcement action for failures to meet legal standards.

Scope of the Food Service

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

The Smithfield Enforcement Team is responsible for delivering food standards and health & 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 which look back on the work completed in recent years and what is planned for 2015-2016. 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.

<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"> ▪ To risk rate 100% of Smithfield businesses in accordance with the FSA's Food Standards Risk Rating Scheme 	<p>100%</p>

Establishments profile: Food premises

Going into 2015-2016, the current profile of Food premises in the City in terms of the risk ratings, derived from the national Food Law Code of Practice, are as follow:-

Rating and Frequency of Food Hygiene Inspections (Food Law CoP)	Total number of premises at the end of the year			
	2011-12	2012-13	2013-14	2014-15
A rated = Inspected 6 monthly	21	25	31	28
B rated = Inspected annually	98	103	135	120
C rated = Inspected 18 months	940	935	876	514
D rated = Inspected 2 yearly	214	213	265	722
E rated = Inspected ever 3 years	267	288	282	321
Unrated / awaiting inspection	-	21	37	28
City Total	1648	1660	1680	1733
Outside program	72	75	57	
Approved food premises			44	44
Total				1777

FHRS Rating	At current year end (At previous year end)
	2014-15 (2013-14)
0	18 (22)
1	64 (75)
2	88 (111)
3	165 (185)
4	361 (375)
5	960 (875)
Awaiting inspection	36
<i>Exempt, excluded etc.</i>	85
<i>% Establishments rated 3 or better</i>	90 (88)
	1777

Regulation Policy

The City Corporation is committed to the principles of the new Regulators' Code⁵, 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.

Review against the Service Plan for 2014-15

See **APPENDIX TWO** following.

- APPENDIX ONE - SERVICE PLAN 2015-2016**
- APPENDIX TWO - REVIEW OF 2014-2015 AND ISSUES FOR 2015-2016**
- APPENDIX THREE - BACKGROUND TO THE CITY OF LONDON'S FOOD SAFETY TEAM**
- APPENDIX FOUR - RESOURCES**

Jon Averbs
Port Health & Public Protection Director

April 2015

⁵ In force from 6th April 2014

APPENDIX ONE- SERVICE PLAN 2015-16

1. Food Hygiene inspections

Risk based targeted inspections, in accordance with the Food Law Code, including use of alternative controls and enforcement for compliance with Food Hygiene legislation. Out target is visit >90% of food premises due an inspection and any that are overdue for intervention with new premises receiving a full inspection within 28 days of registering or opening.

Food Hygiene Inspections Rating and Frequency	Due 2015-16	Done 2014-15	Done 2013-14	Done 2012-13	Done 2011-12	Predicted commitment)
A rated = Inspected 6 monthly	56	52	49	33	23	390 hours
B rated = Inspected annually	90	127	133	98	81	450 hours
C rated = Inspected 18 months	357	335	589	606	640	1250 hours
D rated = Inspected 2 yearly	400	313	128	141	67	1200 hours
E rated = Inspected ever 3 years	120	97	81	112	96	240 hours
Unrated / awaiting inspection	4	39	36		2	
Totals	1027	963	980	990	909	3530 hours
Approved premises	-		(1)⁶	(1)	(1)	

In addition to the above, several 100 further interventions are planned with delivery vehicles associated with Smithfield Market.

⁶ The premises at Smithfield Market are approved as a cutting plant. Hygiene requirements are enforced directly by the FSA whilst the City Corporation carries out interventions in relation to food standards and other related matters in the market.

2. Food Standards inspections

All high risk premises will be rated in accordance with the required intervention interval in Annex 5 of the Food Law Code of Practice; all others including any overdue inspections will be done when the next relevant Food Hygiene intervention falls due.

Food Standards Inspections Rating and Frequency	Due 2015-16	Done 2014-15	Done 2013-14	Done 2012-13	Done 2011-12	Predicted commitment
A= Annually	1	1	1	1	0	-
B = Two yearly	78	97	94	36	18	-
C = Five yearly	373	175	206	214	292	-
Unrated	5		0	0	0	-
Outstanding	X		20	0	0	-
Total	457	372	301	251	298	450 hours

3. Health and safety in food premises

'Matters of evident concern' are dealt with during the delivery of Official Food Controls inspections and/or when reported to the Service through statutory notifications and where deemed appropriate for further follow up under the National Local Authority Enforcement Code as has been the case since 2012-2013⁷. Further details are outlined in the Health & Safety Intervention Plan for this year and similarly the health & safety work done at Smithfield Market is also included in that plan.

	Due 2015-16	Done 2014-15	Done 2013-14	Done 2012-13	Done 2011-12	Predicted commitment
Health and Safety interventions 'matters of evident concern'	-	-	-	-	89	165 hours work ⁸
Accidents	100*	99 and 1 Dangerous Occurrence	103 ⁹	85	95	75 hours work ¹⁰
LOLER/PUWER reports	10*	11	12	9	3	~10 hours work

*estimated based upon previous years

⁷[National Enforcement Code For Local Authorities - Health & Safety](#)

⁸ 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 (matters of evident concern)

⁹ 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

¹⁰ If no major investigative work is required following a serious accident etc. Note the dangerous occurrence investigation resulted in 21 hours work.

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	662 hours work
--	------	-----	-----	-----	-----	----------------

*estimated based upon previous years

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 2015-16	Done 2014-15	Done 2013-14	Done 2012-13	Done 2011-12	Predicted commitment
Letters with legal requirements	Similar to previous	963	951	957	664	Inc. in Inspection Time quoted above.
Numbers of HIN's	"	15	14	17	19	112 hours
HSW Notices	"	0	0	4	2	Negligible<10 hours
Voluntary Closures	"	9	6	2	3	42 hours
Emergency Prohibitions	"	0	1	2	2	70 hours per case
Legal Proceedings	"	0	0	1	1	147 hours per case

APPENDIX TWO - REVIEW OF 2014-2015 AND ISSUES FOR 2015-2016

Work Activity	2014-2015 Review	2015-2016 Plan
<p>6. Devise and deliver the Annual food sampling program.</p> <ul style="list-style-type: none"> ▪ In accordance with our current Sampling Policy. ▪ An annual commitment for the Teams selected from national and local sampling priorities of the FSA and developed through the London Food Co-ordinating Group (LFCG). ▪ The level of work to fit with the allotted allocation of funded samples through PHE, Food Water and Environmental Microbiology (FWEM) Laboratory, our sampling budget and funded work with the Public Analysts (see above). 	<p>Sampling Plan devised and delivered in accordance with the priorities in our sampling policy. Work included;</p> <ul style="list-style-type: none"> ▪ LFCG co-ordinated food analysis work; the number and type of samples agreed with the Public Analyst and in accordance with his role and work across London. ▪ A separate FSA funded grant bid for work at Smithfield Market was rolled into the above London wide work. ▪ FWEM co-ordinated (national and London) food examination studies 53, 54 & 55. ▪ FWEM and the University of Liverpool also co-ordinated a project exploring the presence of Norovirus environmental contamination in food premises which involved sampling in a number of premises where outbreaks had occurred or were suspected. ▪ We contributed to the FSA nationally coordinated work on testing for the presence of undeclared meat species and allergens in lamb products from takeaway outlets, http://www.food.gov.uk/sites/default/files/lamb-takeaway-finalreport%20-Jan%202015.pdf ▪ A number of samples were also taken following incidents and outbreaks in premises in the City. 	<ul style="list-style-type: none"> ▪ We will take part in the sampling work co-ordinated across London by the LFCG, the Public Analyst and the FSA. ▪ Sampling at Smithfield Market will focus on food authenticity and composition with further provision earmarked for work on the new FIC labelling requirements. ▪ Some microbiological sampling will continue in businesses with poor compliance and we will always consider sampling in outbreaks and incidents. ▪ We will continue with the norovirus project work now that this has been rolled out beyond the pilot Boroughs ▪ 250 hours work

Work Activity	2014-2015 Review	2015-2016 Plan
<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, aiming to improve food hygiene performance. ▪ Use agreed national food safety managements systems such as "Safe Food, Better Business" where appropriate. ▪ Formal enforcement action is not precluded and this will be informed by our Policy Statement on Enforcement. 	<ul style="list-style-type: none"> ▪ We started using the new FSA UKFSS version 9 system, and this has improved co-ordinate and collate sampling work. ▪ A number of food businesses were closed this year with concerns again relating to pest activity that had not been managed. ▪ Closures afford the business the opportunity to focus on resolving the serious issues properly before they resume trading. ▪ The FSA funded additional work with a number of the poorer performing food businesses focusing on those with a take away element. 	<ul style="list-style-type: none"> ▪ The Food Safety Team will continue to focus on food businesses that need to improve compliance. ▪ Follow up inspections will focus on compliance with the revised FSA <i>E Coli 0157</i> guidance where appropriate. ▪ Going into the year, there are 170 premises which are 0,1 or 2 rated under FHRS (at February 2015) ▪ 840 hours work
<p>8. Special Events; Trading outside;</p> <ul style="list-style-type: none"> ▪ Work with other City Corporation departments on special/outside events. Visit sites to be undertaken as necessary with follow-up action taken where required. ▪ Contribute to the auditing of caterers on the Remembrancer's approved list of caterers. 	<ul style="list-style-type: none"> ▪ Street trading legislation and a policy has been developed. ▪ Small events and trading outside on private land took up time. This type of trading continues to evolve with yet more public spaces used to host temporary events and markets on a regular basis. ▪ We audited the food safety performance of Guildhall as part of the tendering process. 	<ul style="list-style-type: none"> ▪ We will continue to engage with the organisers of outside events to ensure that food businesses that come to the City are scrutinised. ▪ We will carry out further work with the caterers on the approved list at the Guildhall and as agreed with the Remembrancer. ▪ 150 hours work

Work Activity	2014-2015 Review	2015-2016 Plan
<p>9. The main provisions of the new EC Food Information for Consumers Regulations (FIC) came into force in December 2014 and further enforcement powers for this legislation are enacted in England by the Food Information Regulations. Businesses in some circumstances will need to consider both the information and labelling they provide to customers. The principle is that information is accurate and it enables consumers to make informed choices; the provisions on allergen information have a direct impact on food safety.</p>	<ul style="list-style-type: none"> ▪ A number of training sessions were attended to assist with the delivery of the new requirements ▪ The website was kept up to date with suitable information and links on new requirements. ▪ In the immediate lead up to the new regulations, visits were made to 30 small FBO's involved in catering. ▪ The aim was to gauge their knowledge and to assist them with the new requirements regarding allergen information and especially the control of 'hidden' allergens ▪ Campden BRI work initially planned by SET was subsequently funded directly FSA and written guidance was compiled and issued for the Smithfield Market traders. 	<ul style="list-style-type: none"> ▪ We will continue to focus on the provision of allergen advice in catering and on the general information requirements in the FIC to help businesses understand the new requirements. ▪ A further round of specific visits [60] will be made to help more smaller businesses in the City. ▪ Specific training is planned by SET for traders at Smithfield Market now guidance has been issued ▪ We will signpost guidance during our inspections and on our own website pages. ▪ We will consider poor performance with food standards legislation especially if this relates to issues of authenticity and provision of allergen information. ▪ Further training for officers is planned on allergens and the requirements of the FIC. ▪ 200 hours work
<p>10. Continue to develop 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. Further legal proceedings work was coordinated through the PH&PP Director's Focus Group. ▪ Further development of our website and the information it contains and the advice it 	<ul style="list-style-type: none"> ▪ There is now a further revision to the Food Law Code from April 2015, principally relating to competency which will be accommodated within the annual appraisal process.

Work Activity	2014-2015 Review	2015-2016 Plan
<ul style="list-style-type: none"> ▪ Capacity building and training of staff is considered and legislative and code changes factored into training and development. 	<p>signposts was completed.</p> <ul style="list-style-type: none"> ▪ Procedures and protocols were developed for the FHRs system. We now receive more requests for re-ratings (where businesses have improved after an initial inspection). ▪ Consistency training was provided for relevant staff in the Food Safety Team to ensure Annex 5 of the Food Law Code of Practice is being consistently applied. This has a knock on effect on FHRs ratings. ▪ One officer completed a Lead Auditor course funded by FSA with a view to assisting with inter-Borough audits on consistency. 	<ul style="list-style-type: none"> ▪ We will contribute to any planned inter-Borough audit work. ▪ 150 hours work
<p>11. Increase awareness and effectiveness of pest control management in food businesses.</p> <ul style="list-style-type: none"> ▪ Some 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 active infestation and a concerted effort is required by the businesses to effect control. 	<ul style="list-style-type: none"> ▪ Closures of food premises in 2014-15 related, again, 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. The emphasis is on prevention and where this does not succeed upon timely and effective control measures.

Work Activity	2014-2015 Review	2015-2016 Plan
<p>12. Commitment to the national Food Hygiene Rating Scheme (FHRS) in the City.</p> <ul style="list-style-type: none"> ▪ All Local Authorities (except one) have now adopted the single national scheme in England and Wales, with the scheme now backed by legislation in Wales where it is mandatory to display your rating. ▪ The FHRS provides consumers with published readily accessible information about hygiene standards in food premises operating in the City and beyond. 	<ul style="list-style-type: none"> ▪ The FHRS rating scheme continues to be a success, contributing to the improvement in hygiene standards in businesses nationwide. ▪ We track fluctuations in ratings and whilst more improve, some do not. For the first time this year there has not been an overall ratings improvement. [89.7% of our premises remain broadly compliant but this is down from the start of 2013 figure was 90.2%]. ▪ We continued to receive requests for re-ratings where improvements have been made (and sustained) following initial inspections. ▪ We facilitated a London-wide project in the City to gauge the level of display in premises with a 3, 4 or 5 rating and to endeavour to improve on the numbers who do display. ▪ We have taken part in two FSA research projects to examine issues involving FHRS rating and the Food Law Code 	<ul style="list-style-type: none"> ▪ The City Corporation will continue to promote the FHRS scheme and will continue to encourage display of the rating sticker within premises <u>and</u> to promote the use of the FHRS rating website 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 with businesses and consumers.
<p>15. Continue to 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 with Harbour & Jones the contract and event caterers; ▪ We signed an agreement with Wasabi, a Japanese food take-way chain in April 2015. 	<ul style="list-style-type: none"> ▪ 75 hours work
<p>16. Smithfield Enforcement Team (SET) to work collaboratively with the FSA on meat delivery vehicle and other initiatives</p>	<ul style="list-style-type: none"> ▪ Interventions including intelligence gathering completed on a significant number of vehicles trading at Smithfield Market. ▪ Other initiatives included work on labelling and traceability 	<ul style="list-style-type: none"> ▪ Interventions will continue with vehicles trading at Smithfield Market.

Work Activity	2014-2015 Review	2015-2016 Plan
17. Work in collaboration with the Food Standards Agency to deliver meat training for London authorities. (SET and City Food Safety Team)	<ul style="list-style-type: none"> ▪ The planned courses did not run this year but plans for delivery have been completed with two pilot courses scheduled in April 2015 	<ul style="list-style-type: none"> ▪ A number of one day courses have been planned with a provisional syllabus set and facilities at Smithfield Market earmarked for use. ▪ The two pilot courses are planned for April.
18. Other work	<ul style="list-style-type: none"> ▪ In April 2014 responsibility for food hygiene inspections of river vessels was transferred from Port Health to the City Food Safety Team (107 premises). ▪ The voluntary closure and FHRS 0 rating of a “celebrity” chef’s butcher shop was reported in the national newspapers some six months after the concerns were originally raised and remedied which caused some consternation. ▪ The team assisted a an officer from Port Health and two officers from SET as they worked to complete the practical elements of the Higher Certificate in Food Premises Inspections. ▪ The team hosted two delegations from the Peoples’ Republic of China’s Beijing Administration for Industry & Commerce who received presentations on the City Corporation’s regulatory work. ▪ We have also hosted a number of visits from FSA staff and from other organisations wishing to observe official control work by local 	<ul style="list-style-type: none"> ▪ The practical training elements of the Higher Certificate in Food Premises Inspections will continue.

Work Activity	2014-2015 Review	2015-2016 Plan
	<p>authorities.</p> <ul style="list-style-type: none"> ▪ In this period there have been seven incidents and outbreaks of gastrointestinal illness associated with premises within the City and which required detailed follow up. ▪ Such work is investigated with our colleagues in Public Health England and in some cases with other local authorities. (215 hours work) 	

APPENDIX THREE – BACKGROUND TO THE CITY OF LONDON AND ITS FOOD SAFETY TEAM

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 but 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 the Superintendent's office, East 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

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 Practice¹¹. 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.

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

¹¹ There were revisions to the Food Law Code which became effective on 6th April 2014

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; 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.

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.

Food Safety Complaints

The Food Safety Team and Smithfield Enforcement Team will continue to respond to 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 complaints to determine the most appropriate follow up action, with previous intelligence and compliance history, both being taken into account.

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 these arrangements are continuing to develop as 2015-16. In April 2015, a new Primary Authority Partnership was signed with **Wasabi**, a Japanese food take-way chain.

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.

However, not all food businesses consult directly prior to carrying out works and starting new developments. 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 at the earliest opportunity, believing this to be the best time to secure sustainable improvements through adequate investment.

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.

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 by competent staff.

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 current contactor for food hygiene enforcement at Smithfield Market.

Food Safety Promotional Work

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 Business Compliance. 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.

Continuing Professional Development (CPD) requirements for Food Officers and generally for Environmental Health Officers (EHOs) as members of Chartered Institute of Environmental Health (CIEH) and the Institute of Occupational Safety and Health (IOSH), are taken into account. The main targets for training for Food Safety-related staff 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 with training records 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]

APPENDIX FOUR - RESOURCES

Finance

The 2014-2015 budget was £478,000 including income from various work streams where charges or costs were applicable. In 2015-2016 the net planned expenditure before income is £476,000.

In 2014-15 the local risk expenditure for the Smithfield Enforcement team was £282,000 net. In 2015-16, the planned local risk expenditure is £286,000 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). Staffing levels have been reviewed as part of corporate wide Service Based Review and will change in 2016-17.

The Smithfield Enforcement Team is managed by a Principal Environmental Health Officer and currently consists of one Senior Authorised Officer and one Authorised Officer. The Principal Environmental Health Officer reports directly to the Port Health & Public Protection Director.

This is also an Operational Support Team that amongst its many duties, administers the Northgate M3 PP database system for PH&PP, adding new premises, registrations and reporting on and extracting data.

Food Safety Team	FTE	Smithfield Enforcement Team	FTE
1 x Assistant Director (Public Protection)	0.25	1 x Principal Environmental Health Officer	1.0
1x Food Safety Team Manager	1.0	1 x Senior Authorised Officer	1.0
7 x EHO posts	6.45	1 x Authorised Officer	1.0
		1 x Administrative Officer	0.25
9	7.7	4	3.25