



## Executive Summary

This Service Plan outlines our service aims, objectives, key activities, and performance measures for 2026/27. It updates and refreshes objectives and sets out how we plan to achieve them.

We regulate food safety, occupational health and safety, and certain public health controls, adhering to frameworks set by national regulators such as the Food Standards Agency (FSA) and the Health & Safety Executive (HSE).

Our focus will remain on high-risk establishments while considering flexibilities for lower risk establishments. Interventions will be tailored to national requirements and local needs.

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## 1. Background

### 1.1 Profile of the Authority and our Service

- The City of London, along with 32 London boroughs is responsible for local government services in their respective areas. The profile of our authority, our organisational structure and governance are detailed [on our website, https://cityoflondon.gov.uk/about-us/about-the-city-of-london-corporation/our-role-in-london](https://cityoflondon.gov.uk/about-us/about-the-city-of-london-corporation/our-role-in-london)
- The Commercial Environmental Health Team (Commercial Team) operates within the Environment Department, Port Health & Public Protection Service (PHPP)

### 1.2 Organisational Structure of the Service

- The team is overseen by the Assistant Director (Regulation and Compliance) and managed by the Commercial Environmental Health Team Manager, with support from Lead Officers for Food Safety and Health & Safety.

### 1.3 Scope of the Service

- The Commercial Team regulates food safety, occupational health and safety and certain public health controls arising from commercial business activities.

### 1.4 Regulation Policy

- Focus on high-risk establishments and adapting to evolving regulatory frameworks.
- PHPP has a [documented enforcement policy](#).

## 2. Overall Aims & Objectives

### 2.1 Aims

- We promote and support a risk based, goal setting regulatory regime developing our service to contribute to the improved management and control of risk, sharing our knowledge.
- Work with others to make workplaces safer and healthier. We help ensure higher risk activities are properly managed, and employers committed to developing healthier workplaces, providing a level playing field for responsible employers by advising, promoting, and where necessary, enforcing good standards of risk control.
- We help ensure Food is hygienically prepared, safe to eat and what it says it is; safeguarding food safety and public health by implementing effective regulatory measures and enforcement actions.
- We regulate in a way that supports businesses to comply and where necessary evolve, whilst not losing sight of the integrity and assurance of safe food for consumers and safe workplaces needing to be at the heart of what we do.
- Sharing our knowledge and continuing our dialogue with stakeholders to improve services, always looking to provide simple, pragmatic advice and support.
- Ensuring our workforce is adequately resourced and experienced, enabling the service to fulfil the objectives set in the Department's Business Plan and this local Plan.

### 2.2 Links to Corporate Objectives and Plans

- Our Service Plan aligns with the City Corporation's [Corporate Plan 2024-29](#), [Health and Wellbeing Strategy](#), [People Strategy](#), and [Digital, Data and Technology Strategy](#) as well as the [Environment Department's High Level Business Plan 2025-30](#).
  - We contribute to corporate outcomes such as providing excellent services, promoting a vibrant and thriving destination, and ensuring dynamic economic growth.
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## 3. Resources, Review & Service Delivery

### 3.1 Resource: Financial and staffing allocation

- We aim to maintain a competent and adequately resourced workforce. The full team compliment is 8.2 Full-Time Equivalent (FTE) posts, with an additional 0.3 FTE for allied food control work in Port Health. Where possible contractors are utilised to cover staff absence.
- Total food establishment numbers are increasing (see Table 2 below), requiring additional food hygiene interventions; the ongoing impact of the Food Standards Delivery Model (FSDM) is also having an impact, with more of these interventions due, this will need to be reassessed this year (a large number can be combined with food hygiene work).
- The FSA are emphasising their expectations in relation to suitably resourced regulation.

- The HSE are now also highlighting their expectations in relation to the duty an Enforcing Authority has to make to ensure adequate arrangements for the enforcement of health and safety legislation within their respective areas of responsibility.

**3.2 Review: Against the 2025-26 Service Plan**

- Our food intervention plans were reviewed in 2024-25 to incorporate the Action Plan agreed with the FSA Performance Team and addressing intervention backlogs. The backlogs originally stemmed from the legacy of the pandemic and the various FSA Recovery Plans. Maintaining a tight resource compared to our business numbers and profile meant we had to resort to additional measures to bring the backlog down.
- In 2025-26 we completed focused intervention programmes for D-rated and E-rated premises. We also updated interventions for other risk categories using the range of flexibilities incorporated in the Food Law Code to select alternative interventions. This was done because time (and resourcing) did not permit full inspections to be completed. We adopted this strategy in September 2025 and again at year end (February/March 2026).
- New/unrated establishments were prioritised in Q1 of 2025-26 but the churn of new establishments continues to increase; the increase has outstripped business closures so our overall intervention burden is increasing. This has an impact on both food hygiene and food standards intervention work. It is possible to combine commitments for these work streams in many but not all cases and in one area we have designed a specific intervention to address businesses that trade solely from office locations. These often have no other GB presence as they are set up to meet legal requirements to have a GB address when importing food.
- Table 1 shows the food hygiene interventions we completed in the year.

Table 1 Intervention Programme Category <sup>1</sup>	Interventions done	
	2024-25	2025-26
Total Inspections & audits*	693	737
(*Inspections by food hygiene risk category).		
A	7	6
B	55	53
C	203	215
D	217	269
E	63	111
<b>New/unrated</b>	148	83

Commercial Environmental Health Team Service Plan 2026-27

Verification & surveillance visits	504	383
Sampling visits	14	6
Advice & education visits	19	12
Information & intelligence gathering visits	194	137
<b>Total</b>	<b>1424</b>	<b>1275</b>

- Key statistics:
  - 95.7% of food businesses were broadly compliant or better for hygiene (an FHRS of 3, 4 or 5) at year-end.
  - 100% of premises in hygiene risk categories A to D, due or overdue, received an appropriate intervention.
  - 60 % of interventions due in category E premises were completed.
  - As noted above there has been a marked increase in the number of food businesses registering with a business churn of over 20% and the number of new establishments registering exceeded those that ceased trading for the first time since the Pandemic; we will need to consider if this requires additional resources
  - We received 259 complaints about food or food premises.
  - 12 premises accepted voluntary closure to effect immediate improvements and to protect the public
  - 30 food businesses applied for and received an FHRS rerating in the period. All but one improved their rating; twenty-one were given a 5 rating.
  - Food Standards interventions. 792 were due. 612 were completed
- We continue to implement the latest food standards delivery model. Further development work is still ongoing to address both the way new interventions are delivered and how data is captured to meet new FSA reporting requirements. In 2023-24 we introduced a new Management Information System (MIS); Uniform, provided by IDOX. Officers were involved in its development to meet data and reporting needs. In 2024-25 we had to consider implementation of the new FSA food standards model. MIS revisions to the food standards risk matrix and migration of old data to the new model were finally incorporated in April 2025; this enabled the model's implementation, including revised data capture for reporting and key performance indicators (KPIs). It is important to note that at the end of 2025-26 our MIS provider's system is still unable to provide all the data capture and reporting functionality required by the FSA. Completing all the expected data returns is therefore currently not possible.
- We completed our cooling tower intervention programme, targeting 51 inspections based on risk rating data from previous interventions and any further intelligence received. Several different team members have been involved in this work to help with business resilience.
- We continue to manage our 12 Primary Authority Partnerships, focusing on occupational health and safety and food safety. This includes audit work across the UK for a high street retailer and developing (and auditing) advice for a national gym company regarding an unstaffed model of work.

- We completed a programme of interventions in establishments with massage and special treatment licences.
- We actively take part in Safety Advisory Group (SAG) activity as necessary and reviewed 50 event applications to City of London in relation to health and safety matters this year.
- Several outbreaks and incidents were followed up in the year with our colleagues in the United Kingdom Health Security Agency (UKHSA).

### 3.3 Service Delivery: 2026-27

- We will continue to prioritise high-risk and non-compliant establishments, deliver planned interventions, prioritising new premises, investigate complaints, support businesses through the Primary Authority scheme, and implement a risk-based sampling programme. We will respond promptly to food safety incidents and collaborate with other authorities to ensure consistent enforcement. We will investigate notifications of illness, disease outbreaks and food-related infectious disease in partnership with UKHSA and the City & Hackney Public Health Teams.
- Our overall Food Establishment Profile is detailed in **Table 2** below.

Table 2 Establishment profile by Intervention rating (risk) category	Total Number of establishments	
	2024-25	2025-26
A	12	3
B	61	56
C	319	353
D	809	867
E	422	512
Unrated	162	63
<b>Total</b>	<b>1785</b>	<b>1854</b>
Other category (e.g. Approved premises and not rated for hygiene)	65	60

- Specific planned interventions, controls and activities are detailed in the section on the services objectives and activities. The number of food hygiene interventions that are due are detailed in Table 3; these include businesses that registered on or before 1<sup>st</sup> April 2026 and still require an initial inspection. Our intervention programme will also include any further new establishments that register during 2026-27; this figure is likely to be significant. In recognition of the issues with FSDM delivery, data collection and reporting, the FSA have developed a further delivery timetable which we are expected to meet.
- We will need to consider how known MIS reporting limitations can be mitigated during the year to maintain confidence in data quality and reporting, but this is currently unknown.
- Details of our service delivery points are explained on our website [here](#).

## 4. Quality Assessment

### 4.1 Quality Assessment and Internal Monitoring

- We have implemented measures within our Management Information System (Uniform) to maintain and improve data accuracy. The system now provides access to quantitative information that enables monitoring of officer performance, and we are continuing to develop tools that will present real-time service demand data. This will enhance our ability to allocate resources effectively. Our enforcement activity and key performance indicators (KPIs) are regularly reported to the Port Health & Environmental Services Committee.

## 5. Objectives and Activities

### 5.1 Deliver a Targeted Programme of Official Food Controls

We will meet service delivery expectations for Local Authorities in the Food Law Code, prioritising high-risk and non-compliant establishments. We will manage the transition to the new food standards delivery model and undertake proactive surveillance to maintain an accurate business landscape.

This table shows the proactive hygiene inspections that are scheduled for 2026-27.

Food Hygiene Intervention Rating Risk Category, (Interval)	Interventions due		Table 3
	2025-26	2026-27	
A (6 months)	7	2	
B (12 months)	57	56	
C (18 months)	155	210	
D (2 yearly)	361	415	
E (3 yearly)	77	185	
<b>Total interventions</b>	<b>657</b>		<b>868</b>
Unrated	197	85	

### 5.2: Maintain Support for the National Food Hygiene Rating Scheme (FHRS)

We will support FHRS and ensure the credibility and objectivity of the scheme. Our intervention work will establish compliance even in lower-risk premises, and we will support re-rating visits as outlined on our website.

Distribution of FHRS ratings.

FHRS Rating	Number premises (08-03-2026)	Category, %	Table 4
0	3	4.3% Non-compliant	
1	27		
2	46		
3	38	2.2% Broadly compliant	

4	129	Good or Very Good 93.5%
5	1505	
Unrated/outside program	106*	*63 premises unrated
<b>Total</b>	<b>1854</b>	

**5.3: Appropriate food standards interventions are completed using the new food standards risk rating model (FSDM)**

Our regulatory work remains a targeted (risk-based) intervention program developed to ensure businesses meet key requirements in both food hygiene and food standards. The food standards interventions due in 2026-27 are in Table 5 below

Food hygiene and appropriate food standards interventions are combined in new/unrated establishments; The majority of the food standards interventions required can also be managed through the food hygiene program as they were in the previous system. However, priority food standards interventions will be managed differently as well as certain office-based establishments (where intervention frequencies for standards are different from hygiene work).

Table 5

(in months)	Total	Interventions due	
		2025-26	2026-27
3	0	0	0*
6	3	8	3*
12	21	17	21
24	229	161	229
36	273	157	146
48	198	58	47
60	710	275	236
72	277	116	87
120	43	0	0
<b>Total</b>	<b>1754</b>	<b>792</b>	<b>769</b>

\* Priority interventions

**5.4: Develop and Implement a Risk-Based Food Sampling Programme**

We have a [Sampling Policy](#) and we participate in relevant regional/national studies. We will exchange intelligence on sampling results to maintain a robust system of Official Food Controls. We continue to use the FSA national UK Food Surveillance System (UKFSS) to record samples though the future of this system (and any replacement) is not certain.

**5.5: Ensure Adequate Arrangements for Health and Safety Regulation and Enforcement**

We will focus on high-risk duty-holder businesses and activities, undertaking targeted initiatives based on local intelligence and evidence of risk. In setting our priorities we will utilise HSE Local Authority Circular (LAC) 67-2 Setting Local Authority Priorities and Targeting Interventions. LAC 67-2 has been revised for 2026 but on a three-year cycle (not annually as previously). Our

programme will include interventions focusing on duty-holders management of legionella in cooling towers (50). We will promote proportionate health and safety through business engagement and partnership working.

**5.6: Promote Workplace Health and Wellbeing**

We will align our work with the evolving public health agenda, encouraging the development and use of good practice frameworks for workplaces. We will raise awareness of work-related stress and mental health campaigns where appropriate.

**5.7: Develop Primary Authority Partnership Work**

We will pursue ongoing Primary Authority Partnership (PAP) work, providing assured and tailored advice to businesses. We aim to improve support for businesses and economic growth, ensuring progress towards the Government's better regulation agenda. Currently we have 12 PAP agreements. Details are available on the [GOV.uk website](#).

**5.8: Further Develop the Commercial EH Team**

We will focus on our people, producing training and development opportunities, and aligning with the City Corporation's People Strategy. We will enhance the competency of our frontline professionals and develop suitable training arrangements.

**5.9: Develop IT and Information Management Systems**

We will work collectively to embed and develop Uniform to match business processes, develop Power BI data reporting, and improve our digital customer services. We aim to streamline internal and external processes, reducing administrative burdens and improving information and intelligence gathering.