



London Borough of Hackney

Food and Health & Safety Law Enforcement Service Delivery Plan 2026/27



INVESTOR IN PEOPLE

CONTENTS

1. INTRODUCTION	3
2. FOOD LAW SERVICE AIMS AND OBJECTIVES	5
2.2. Food Safety Service Performance Indicators for 2026-27	7
3. BACKGROUND	9
3.1. Scope of the Food Safety Service	9
3.2. Demands on the Food Safety Service	10
3.2.10 Additional Priorities and Partnership Working	16
3.3. Enforcement Policy	16
4. SERVICE DELIVERY	17
4.1. Interventions at Food Establishments	17
4.2. Food Standards Inspection Programme	18
4.3. Secondary visits (Re-visits)	18
4.4. Complaints and Service Requests	19
4.5. Advice and Training to Businesses	19
4.6. Food Sampling	20
4.7. Control and Investigation of Outbreaks and Food Related Infectious Diseases	20
4.9. Key Areas for Improvement/Development for the next two years:	21
5. RESOURCES	22
5.1 Resources for 2026/27 - Staffing Allocations	22
5.1.2 Resource Allocation per Activity	22
5.1.5 Re-inspections requests following programmed inspections (chargeable)	24
6. QUALITY ASSESSMENT	30

1. INTRODUCTION

This is the London Borough of Hackney's mandatory annual plan for the effective enforcement of food safety legislation, and follows the national template as directed by the Food Standards Agency (FSA), through the Framework Agreement with Local Authorities. This plan refers to the food law enforcement functions undertaken by Hackney's Climate, Homes and Economy Directorate.

This plan also incorporates the Health and Safety at Work legislation related functions, including enforcement, which is delivered by the Environmental Health Service. The H&S regulatory functions (including enforcement) in most of the commercial premises is within the remit of the EHS. The details of the function can be seen from a separate document by clicking in annex 2 below **Annexe 2**. The Council is required to submit yearly returns to the Health and Safety Executive. Given the restricted resources available, the Service is not able to proactively inspect and take enforcement action but has notionally allocated 0.9 FTE which is the absolutely minimum resource required to deal with any 'matters of evident concerns' identified during food safety/standards inspections, and H&S related complaints and accident notifications. The itemised details can be found in the above mentioned document.

The objective of the plan is to demonstrate how the service ensures food safety and health and safety at work in the borough. The Environmental Health Service provides these functions and aims to deliver an intelligence-led, risk-based approach to business regulation that achieves a high level of consumer protection.

It sets out the aims and objectives of the direction for the delivery of food safety in Hackney for 2026–2027, in line with the Mayoral and Corporate priorities.

Following the loss of the previous Management Information System (MIS) due to a cyber attack in 2020 a new, Arcus Global, was procured. However, after a trial it was deemed not to meet the needs of the Council and the contract was not extended. In its place an in-house system based on Google AppSheets was developed by the IT department which only partly meets the requirements. The Council had difficulty in finding 'true data' to transfer onto the new database.

A new MIS system will now need to be procured which can meet the needs of the service and for the accurate and efficient submission of statutory returns to regulators. At the end of every financial year each local authority is legally required to submit a summary of their food law enforcement activities at food establishments including a summary of statistics on the numbers of inspections conducted and their outcomes to the Food Standards Agency (FSA) and the Health. The FSA had been expressing some concerns over this and highlighted the less than expected performance in correspondence following the regular 'temperature checks' on service delivery. This was mainly due to the shortage in staffing resources and a lack of fully functional MIS.

This, coupled with long term staff sickness, had resulted in a backlog of food hygiene and food standards inspections. The accumulated backlogs over the years due to the periodic FTE deficits in the staffing resources led the central regulators, the Food Standards Agency, escalating their concerns with the Assistant Director for CSEBR and warned about the potential of 'special measures' procedures being instigated. It was felt by the senior management that given that the FSA would adopt a formal regulatory position if substantial resources were not deployed in dealing with the continued backlog of inspections, a feasible proposal to align the Council with the Food Law Code of Practice. A three year proposal with injection of 3 FTE officers in the first year was submitted to the FSA (Annex 1) which was accepted. It was further agreed that administratively it will be cost effective to outsource the bulk of the inspections (1787) to an agency recruiting professionally qualified practitioners. The outsourced agency was able to carry out these inspections with monitoring supervision and administration by an EH manager.

In 2025/26, 873 new food premises registrations were received as of 31st March 2026, an average of 72 per month.

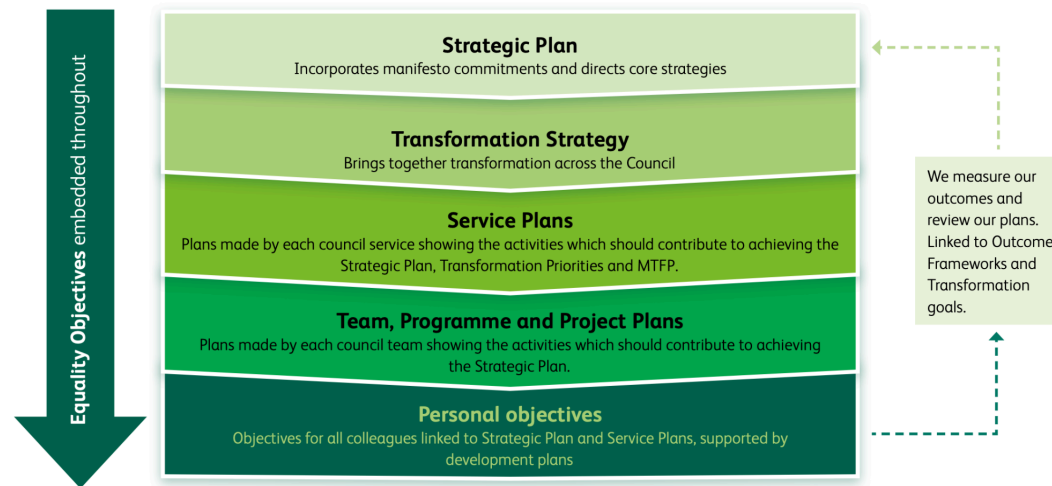
It is evident that the current staffing levels will require bolstering to meet the demands placed on the service in the next two years. Especially for implementing the new proposed Food Standards and Food Hygiene Delivery Models. Food Standards Delivery Model (FSDM) is scheduled to be implemented towards the start of 2026/27 which will be very resource intensive at the beginning of it being introduced by the Local Authorities. The service will be challenged to ensure the provision of safe food, evaluating how to use resources differently and deliver the work innovatively and collaboratively in order to maintain and increase inspection levels. Better use of more focussed inspections and interventions (as permitted by the Food Law Code of Practice), targeted on key food safety elements of businesses will also help to improve efficiency while maintaining a high level of public protection. Obviously, the implementation of the FSDM will be hampered by the lack of a current and functional MIS system and its introduction may be delayed. However the Food Standards Agency, being aware of our current situation are exploring the possibility of us being supplied with a bespoke spreadsheet.

It is considered that the service may not make a full recovery until a new functional MIS system is procured. In the meantime the use of an AppSheet developed to help officers to carry out and record inspections will be continued. The rate at which the Service recovers is largely dependent on the efficiency of a new premises management database, its provision for mobile working and the continued hard work and dedication of the EH team.

2. FOOD LAW SERVICE AIMS AND OBJECTIVES

2.1. Aims and Objectives

How the Service Links to Corporate Priorities



Hackney's Vision: A place for everyone

Working Together for a <i>Greener, Healthier Hackney...</i>	Working Together for a <i>Safer, Fairer Hackney...</i>	Working Together for <i>Every Child in Hackney...</i>
<ul style="list-style-type: none"> • Healthier ways to live • Improving health and wellbeing and tackling health inequality • Responding to the climate emergency • Shaping Places - encouraging community support and connections, by creating good community networks. 	<ul style="list-style-type: none"> • Tackling Poverty and Inequality • Responding to the Housing Crisis • Good growth: Jobs, businesses and regeneration • Community cohesion - building communities where people feel confident that they belong and are comfortable mixing and interacting with others 	<ul style="list-style-type: none"> • Every child is healthy, every child develops positive and caring relationships and feels seen and heard • Focusing on reducing child poverty.

- | | | |
|--|--|--|
| | <ul style="list-style-type: none">• Building trust and confidence• Making Hackney Safer | |
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The corporate plan refresh document can be found at the following link: <https://hackney.gov.uk/strategic-plan>

Environmental Health Service: Food Safety Service - undertakes a range of food hygiene, food standards and health and safety interventions across all Hackney food businesses including the provision of advice and information. The team also carries out infectious disease investigations, investigation of food complaints and food sampling work. It is required to:

- Work with businesses to protect consumers from harm by ensuring that food produced, distributed and marketed in the borough is safe and wholesome for the consumer to eat. This will be measured by an increase in broadly compliant businesses, increasing the number of FHRs rated 3-5 premises and a reduction in FHRs rated 0-2 premises.
- Work with businesses to ensure that food produced, distributed and marketed in the borough meets labelling and compositional requirements and is presented so that consumers are not misled as to its nature, substance or quality. This will be met by raising issues highlighted during visits to premises, acting on service requests and complaints, through promotional material where relevant and increasing enforcement for non-compliance following a graduated approach.
- Deter, detect, investigate and disrupt fraudulent activity involving food, including the illegal importation of food. This will be measured by taking an active role in local, regional and national food fraud initiatives and meetings, by organising intelligence-led action days to disrupt potential fraudulent activities and increasing enforcement for non-compliance following a graduated approach.
- Prevent the spread of infectious disease and food poisoning and to investigate outbreaks by working with Public Health England and the Covid Response Team investigating notifiable disease in line with agreed protocols, participating in local, regional and national initiatives and meetings.
- Provide advice and education to all sectors of the community on food safety matters and to meet the training needs of the businesses in Hackney with the promotion of in-house training courses and participation in national initiatives such as Food Safety week.

- Work with other services, local authorities and agencies with common objectives to provide effective enforcement. This will be achieved by attending local, regional and national meetings, benchmarking with neighbouring authorities and by taking part in internal and external partner-led initiatives.
- Protect businesses from economic disadvantage caused by competitors not complying with food safety legislation and by following a graduated approach to enforcement.

2.2. Food Safety Service Performance Indicators for 2026-27

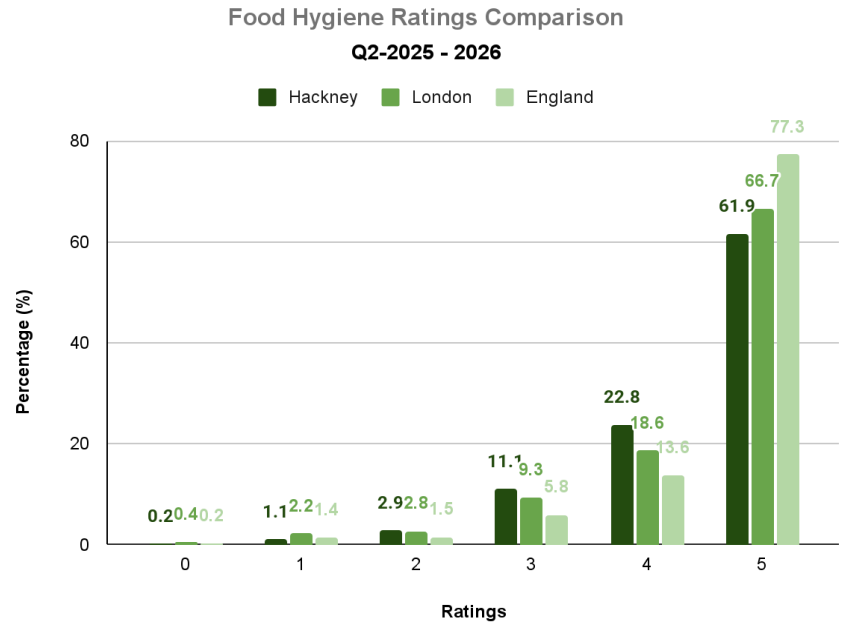
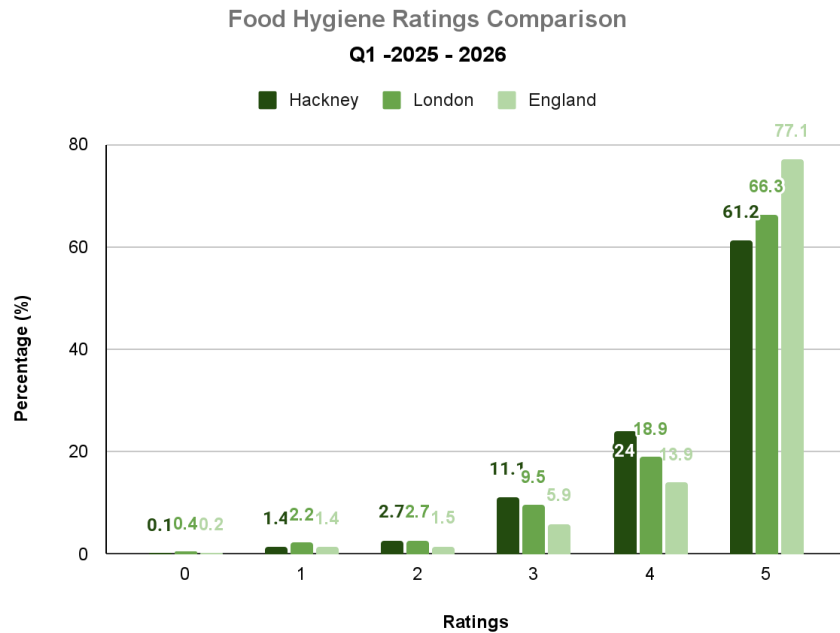
The service has a number of key performance indicators and the performance of the service is measured against the following:

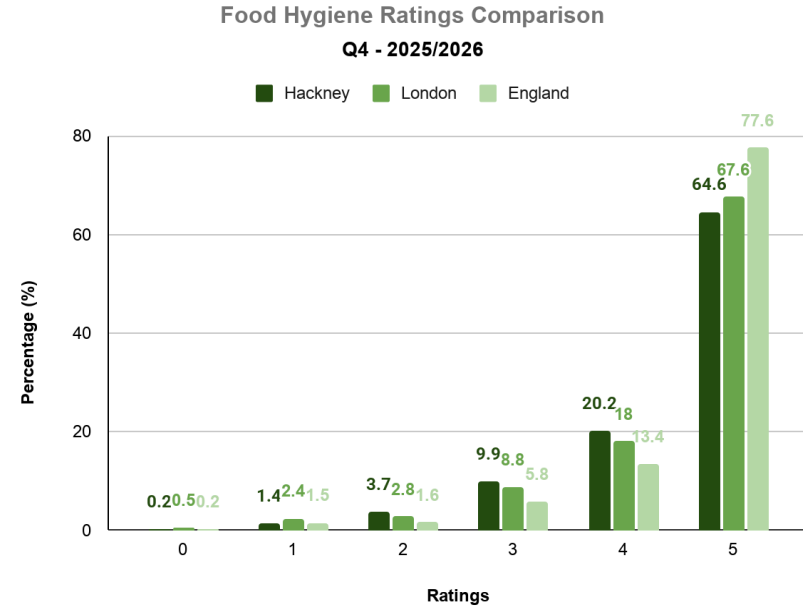
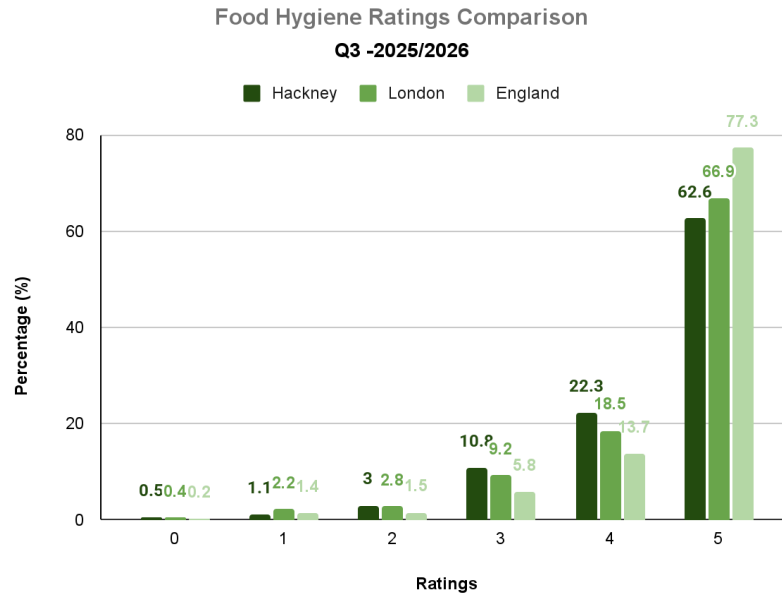
PI Code	Short Name	Frequency of reporting	Directorate	Annual Target 2025/2026	Achieved (as of 31/03/2025)	Data Only PI	2026/27 Target
NH PRS 030	% of service requests/consumer complaints about food businesses actioned within 15 working days	Quarterly	Climate, Homes and Economy	95%	100%	No	100%
NH PRS 032	Percentage of category A and B (food hygiene) risk premises inspected within 28 days	Quarterly	Climate, Homes and Economy	100%	100%	No	100%
NH PRS 034	% of Broad Compliance for food hygiene (accumulative)	Quarterly	Climate, Homes and Economy	89%	95%	No	95%

NH PRS 036	Number of unrated food premises	Quarterly	Climate, Homes and Economy	Less than 70	134	Yes	Less than 70
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The service was in the main, despite some challenges, able to perform broadly well towards meeting these performance indicators and targets. The charts below demonstrate the achievements:

Food Hygiene Rating Scheme Sores in Comparison with London and England





The above quarterly comparison of FHRs ratings of Hackney and London demonstrate that Hackney is closely aligned with other London borough councils in respect of ratings and indeed the broadly compliant figures (combined ratings of 3 to 5). Hackney's Food Hygiene Rating Scheme (FHRS) results, when compared quarterly against those for other London boroughs, show a close alignment. Specifically, Hackney's proportion of broadly compliant establishments (those with a rating of 3, 4, or 5) is comparable to the London average.

3. BACKGROUND

3.1. Scope of the Food Safety Service

3.1.1. The Food Safety Service is responsible for food hygiene, food standards, public health activities and health and safety in all food premises, and involves both planned and reactive work.

3.1.2. Food Safety Service Officers hold dual warrants for food safety and health and safety, so when appropriate, health and safety hazard spotting (matters of evident concern) and food standard inspections are carried out at the time of the primary food hygiene inspection.

3.1.3. The Food Safety Service provides the following services:

- Conducting official controls and other interventions at a frequency determined by Food Law Code of Practice and taking appropriate enforcement action as necessary;
- Working with local food businesses to help them comply with their legal responsibilities and good hygiene practice, by providing information, advice and guidance;
- Prevention, control and investigation of infectious diseases, outbreaks, and food-related infectious disease and food poisoning associated with food businesses in Hackney in accordance with the joint infectious disease protocol, London Outbreak Management Plan 2025 and advice from the Consultant for Communicative Diseases Control (CCDC) and the Public Health Laboratory Service (PHLS), within the United Kingdom Health Security Agency (UKHSA);
- Undertaking sampling in accordance with our sampling policy, sector and national programmes;
- Control of imported foods in accordance with centrally issued guidance;
- Investigating complaints about food premises and food purchased/provided by consumers in Hackney;
- Initiating and responding to food alerts about unsafe or unwholesome food and taking appropriate action as necessary;
- Processing applications for approval relating to the production of meat products, minced meat & meat preparations, dairy products, egg products and fishery products;
- Carrying out activities with regard to a food safety enforcement policy in line with the central government issued guidance;
- Undertaking food safety initiatives (Food Hygiene training and community events etc.); and
- Delivering the Healthier Catering Commitment project in conjunction with Public Health to increase healthier food options available at independent catering outlets in Hackney. This project plays a key role in Hackney's Weight Strategic Partnership.

3.1.4. The Trading Standards Service is responsible for Feed Law enforcement to ensure that any feed used is safe and does not adversely affect the human food chain.

3.2. Demands on the Food Safety Service

3.2.1. Premises Profile

As of March 31st 2026 there were approximately 2599 [at 31/3/26] food businesses registered within Hackney. Historically the majority of food businesses in Hackney are catering premises at 55%. These are mainly sole trading micro businesses a number

of which require support, advice and enforcement to ensure that the food they supply is safe to eat. This is reflected in the inspection programme. Food retailers make up the second most significant group (30%), with the remaining 8% being made up of food manufacturers, exporters, distributors and importers. However, since the pandemic we have seen a shift in these percentages as businesses have been financially unable to continue trading and there has been a move towards domestic/take-away catering and dark kitchen establishments.

3.2.2. Outdoor Events

Historically the Borough hosted a large number of annual festivals and other outdoor events which attracts community caterers and a large number of temporary caterers, pop-ups and food producers, all of which require vetting and inspecting as necessary. These ranged from several large events such as the Hackney Carnival and events held in Queen Elizabeth Olympic Park to smaller churchyard-style events held throughout the Borough.

3.2.3. Imported Food

As well as responding to complaints, referrals and notifications, the service carries out routine inspections and a range of proactive activities in premises across the Borough and in street markets that deal with the trade of illegally imported foods.

The Food Standards Agency has placed greater emphasis on local authority Food Safety Services to ensure controls on third country imported food (i.e. food currently imported from countries outside of the European Union) however this has changed since the EU Exit: now all EU countries are treated as third countries'. As a result, as food from the EU will be deemed imported from 'third countries', and all imported/exported foods must comply with the laws, regulations and other legal and administrative procedures of the importing country.

Similarly, there have been changes for businesses supplying food to EU member states in terms of labelling requirements and export requirements. Since Hackney has a number of exportation manufacturers we will be required to provide health certification for exports and provide support and guidance to businesses regarding changes post-EU exit.

There is a high level of imported foods from non-EU countries entering the Borough, either directly imported by businesses or by third parties located elsewhere. Some of these foods can be illegal (i.e. banned from importation, processed in a way that contravenes legislation, or they do not comply with compositional or labelling requirements). Examples of this include fruit, vegetable and nuts that appear on a monthly warning list issued by the Food Standards Agency for investigation principally for chemical contamination such as pesticide residues. This area of work can have a high impact on the Service due to the number of

businesses handling low cost imports to meet high consumer demand. This food, however, gives rise to a risk to human health and where necessary it is removed from sale and enforcement action taken. This has led to increased related work activities such as sampling and surveillance activities.

3.2.4. New Businesses

The number of food businesses in the Borough, subject to food hygiene control, stands at 2599 [these figures have been taken from the FSA's FHRS portal; however, many newly registered businesses have yet to be entered onto the FSA's premises portal. In 2025/2026 the service received 873 of new food registrations. It is estimated the Service will receive a similar number in 2026/27.

3.2.5. Food Hygiene Rating Scheme

Hackney participates in the national Food Hygiene Rating Scheme (FHRS). The scheme is designed to give the public information about local food businesses so that they can make informed choices about where they eat locally (and nationally). As a result the scheme allows for greater transparency for consumers and businesses due to work conducted by Hackney Food Safety Service. It also recognises those businesses that are operating to a good standard and aims to provide an incentive to those businesses that have not made food safety a priority. However, the display of the rating sticker is still not mandatory in England but the Food Standards Agency is supportive of its introduction and additional legislation may be introduced after the EU exit transition period.

Following an inspection, a business can be given one of the following FHRS ratings and uploaded on the National FHRS website (<http://ratings.food.gov.uk>) which can be accessed by businesses and consumers.

Businesses that obtain a rating of 0 to 2 are re-visited to ensure that they are compliant and they are encouraged to request a re-inspection to improve their rating. The Food Standards Agency has introduced changes to the scheme so that Councils can charge (on a cost recovery basis) for any re-rating inspections and businesses will no longer be restricted to a single re-rating request. Since the introduction of the re-rating charging scheme the request for re-rating has increased to £342 and a further increase in line with the bench marked increases is expected. This increase may lead to reduced re-inspection requests but indirectly may also contribute to businesses being more compliant with the relevant legislation.

3.2.6. Food Standards Delivery Model

The FSA from 1st April (2025/2026) has implemented the Food Standards Delivery Model (FSDM) in England. This is a fundamental change to the way in which EHO's have discharged their statutory duties for over three decades since the current

regulatory framework was introduced. The EHS could not implement the FSDM primarily due to the non-availability of a functional MIS. It is anticipated that the FSDM plan may be rolled out based on bespoke spreadsheets developed by the FSA, pending the procurement of an MIS. The FSDM includes:

- a modernised food standards intervention rating scheme, including a decision matrix, to determine the appropriate frequency of food hygiene controls based on the risk posed by a food business establishment
- an updated risk-based approach to the timescales for initial official controls of new food establishments, and for undertaking due official controls
- increased flexibility as to the methods and techniques of official controls that can be used to risk rate an establishment, including the appropriate use of remote assessment
- extending the activities that officers, such as Regulatory Support Officers, who do not hold a 'suitable qualification for 'food standards' can, if competent, undertake.

The fundamental changes to the delivery model increases the inspection frequency of high risk premises with lower risk premises being inspected, on average, every 5 to 10 years, the use of remote inspections (depending on the nature of the business, confidence in management and previous inspection type) and the use of regulatory/graduate Environmental Health officers to discharge low risk duties (in accordance with the Food Law Code of Practice). The full implementation of FSDM, depends on our MIS's ability to process information. The MiS is currently not fully functional and proving to be not fit for the purpose, and hence the senior management has taken the decision not to renew the existing contract and to procure another suitable alternative which will fully meet the needs of the Business Regulation Team. The Service is liaising with the Food Standards Agency who are aware of the situation and together we are exploring the possibility of implementing the FSDM by using a workaround system based on spreadsheets. The implementation of a MIS based FSDM has therefore been delayed mainly due to the lack of the functioning MIS system. It is anticipated that the implementation would go ahead using a workaround system, and may be activated in September 2025. The full implementation will have a direct impact on human resources and the current compliance landscape in Hackney.

3.2.7. Broad Compliance with Food Safety Legislation

The broadly compliant businesses are mainly those businesses which have achieved an FHRS rating of '3' or above, but a few businesses with a rating of '3' can be considered non-broadly compliant if one of the three components, which collectively determine the overall rating, is less than satisfactory. In the absence of an 'information management system', the figure for the

broadly compliant could not be determined accurately. The Service had to continue depending on a workaround system, based on multiple spreadsheets, making it a very difficult and time consuming task to accurately determine the broadly compliant figures. However, taking the data from the FSA's portal for the FHRS ratings, which is dynamically accurate, consistently showed that businesses which received an inspection 2025/26 over 95.7% of those were awarded ratings of '3' or above.

3.2.8. Food Allergens

Allergy awareness has received widespread media attention in the last few years due to the tragic deaths of customers exposed to allergen; as such the Government has tightened the controls on allergen labelling for non-prepacked foods.

Changes to the Food Law Code of Practice have incorporated allergen controls as a food safety issue and the Service has been placing greater emphasis on allergen controls at food businesses during routine inspections. Issues regarding a lack of staff knowledge, poor communication between kitchen and front of house staff and potential cross-contamination have been found. Test purchasing of foods has also been undertaken from take-away premises which have been analysed for a specified allergen. A detailed assessment of allergen controls will be undertaken during routine food hygiene inspections of catering premises. Sampling (including test purchasing) will also be undertaken to assess controls based on inspection outcomes.

3.2.9. HCC

Healthier Catering Commitment: This is a London-wide project supported by the Association of London Environmental Health Managers, the Chartered Institute of Environmental Health and the Greater London Authority delivered by local authorities which aims to improve the food offer in food businesses that have a food hygiene rating scheme score of 3 or above, by working with businesses to substitute and increase visibility of healthier options. The HCC has been delivered in Hackney since April 2017 and contributes to local action to improve access to healthy food outside the home. There are currently 106 businesses signed up to the HCC scheme in Hackney. This is an important project in Hackney that aims to increase both access to healthier affordable food in the borough and easier access to information in the form of signposting these places to residents through various channels.

The project is targeted towards food businesses that are in the most deprived wards in the borough. The ten most deprived wards in Hackney are shown in the table below with the data that corresponds to the percentage of children who are 'overweight' or 'very overweight' in reception year and year 6.

Hackney Ward	Index of Multiple Deprivation	NCMP data - overweight / very overweight % (reception year)	NCMP data - overweight / very overweight % (Year 6)
Woodberry Down	41.3	30.3%	49.1%
Hackney Wick	40.8	31.3%	52.4%
Homerton	38.6	28.8%	45.4%
Haggerston	37.8	26.5%	41%
Kings Park	37	27.5%	46.2%
Springfield	34	25.7%	40.6%
Victoria	33.6	23.5%	39.7%
Hackney Central	33.4	32.8%	44%
Hackney Downs	32.5	27.6%	42%
Shacklewell	31.9	26.3%	47.1%

Hackney is the first borough in London to trial adding three sustainability conditions to the scheme. These conditions are based on reducing food waste, supporting sustainable diets and reducing plastic packaging. The HCC officer has worked with ReLondon and the Ellen McArthur foundation to create these conditions. This aspect of the project works in collaboration with [Hackney's Climate Action Plan](#) and is currently in a trial pilot phase, with businesses being signed up for an initial six week period to see how they can adapt to adhere to the new sustainability conditions. Businesses will receive a window sticker upon signing up to the new sustainability conditions. At the beginning of 2026 Hackney worked with Tower Hamlets council on creating a healthier food range with the wholesalers JJ's food service, and worked to establish a discount offer for businesses who are signed up to the HCC project. Hackney will continue to work with other councils and food partners to make healthier food more affordable for businesses across the borough.

In Hackney, the project is being delivered by Environmental Health with financial support from Public Health colleagues which funds one full time Officer and forms a key part of the Council's obesity reduction strategy.

3.2.10 Additional Priorities and Partnership Working

Joint working with other internal teams will improve following the re-organisation of Regulatory Services allowing the Food Safety service to take advantage of the Intelligence Hub and cross-services tasking arrangements to further improve efficiency of service delivery.

3.3. Enforcement Policy

3.3.1. The Food Safety Service recognises that whilst businesses look to maintain their reputation and wish to maximise profits, they also seek in most instances to be on the right side of legal requirements without incurring excessive expenditure and administrative burdens. So, in considering enforcement action, the service will assist food businesses to meet their legal obligations without unnecessary expense, whilst taking firm action that may include prosecution or other formal action, where appropriate, against those who disregard the law or act irresponsibly.

3.3.2. The published Enforcement Policy, which follows a graduated approach, outlines all enforcement actions to be carried out by officers in relation to food safety legislation, and seeks to ensure that formal enforcement is focused where there is a real risk to public health and that officers carry out actions in a fair, practical and consistent manner. All authorised officers will follow the Enforcement Policy when making enforcement decisions.

3.3.3. The Enforcement Policy, which was approved by Cabinet on 21 January 2019 and remains highly relevant, takes account of the principles of the Enforcement Concordat, the Regulator's Code, FSA's guidance, and has regard to Crown Prosecution Service guidelines and Equality Impact issues. The Plan will allow the use of resources more effectively in assessing high risk activities whilst delivering benefits to low risk and compliant businesses.

3.3.4. The Service will generally seek to recover from businesses the costs associated with any additional official controls (such as emergency closures of food businesses).

4. SERVICE DELIVERY

4.1. Interventions at Food Establishments

4.1.1. The Food Safety Service will employ a full, partial or range of other official controls (interventions) (as permitted by the Food Law Code of Practice) to assist in raising the compliance rate and achieve broad compliance in food premises. Interventions including sampling, monitoring, surveillance, education or verification visits should enable a lighter touch for compliant premises, and also enable additional resources to be targeted on non-compliant premises in line with the Regulators' Compliance Code.

4.1.2. Food hygiene inspections are the main driver for performance of the Food Safety Service, as a result of the priority setting and the scrutiny of the performance of the Service by the FSA, and local and national indicators. Inspections are allocated to officers who are appropriately qualified and authorised in accordance with the Food Law Code of Practice.

4.1.3. Following a primary inspection of each food business, a risk category is assigned based on the type of food business and the type of food it handles as well as the conditions found at the time of the inspection. Category 'A' and 'B' rated premises pose the greatest risk and these are therefore inspected at a greater frequency (6 and 12 months respectively) and always within 28 days of the date due for inspection.

4.1.4. Food hygiene inspections are given priority in accordance with the Food Law Code of Practice and associated Practice Guidance, issued by the FSA and in line with Hackney's Food Safety Service, Food Hygiene Inspections and Food Standards Procedures. Therefore, the majority of resources allocated to food safety are devoted to planned primary inspections for food hygiene purposes.

4.1.5. In accordance with the Food Law Code of Practice, the Service aims to inspect 100% of all food hygiene inspections due within the financial year. Priority will be given to the highest risk premises category A-B premises and all non-broadly compliant category C and category D premises that are due.

4.1.6. Partial inspections will be conducted on broadly compliant category C and D premises, in line with the Food Law Code of Practice. This will reduce the burden on businesses and concentrate resources on the non-compliant businesses. However, a full inspection will be carried out if a compliant business is not in control of risks or a public health risk is identified.

4.1.7. In accordance with the Food Law Code of Practice, the Food Safety Service aims to inspect all food hygiene businesses due for inspection in 2026/27. Due and overdue category A and B premises, all unrated/new premises and not broadly compliant C premises will be inspected as a priority in the months for which they are due.

4.1.8. New premises will be added to the inspection programme as the service becomes aware of them, as these premises count against the overall broad compliance percentage and hygiene rating. Under the Food Hygiene Rating Scheme, new unrated businesses are deemed to be non-compliant until they are inspected. As such, not inspecting new businesses will reduce the overall broadly compliant figure.

4.1.9. Any complaint, received against a premises risk rated C, D or E may also result in a Food Hygiene inspection. The decision to inspect will be based on the nature of the complaint and the officer's professional judgement.

4.2. Food Standards Inspection Programme

4.2.1 Officers will carry out food standards inspections to build up a premises profile for food standards within the Borough. However, in order to configure inspections regime with the new Delivery Model for food standards additional resources, training and

4.3. Secondary visits (Re-visits)

4.3.1. Officers will undertake additional visits to premises where follow-up/formal enforcement action is required as a result of serious contraventions found at the time of a primary (programmed) visit or where a contravention is not remedied through informal measures. A secondary visit will consist of one or more intervention activities. Additionally, all chargeable re- inspection requests will be inspected on average within 2 weeks of receiving the request.

4.3.2. Primary inspections resulting in advice to food business operators about minor technical contraventions will not receive a secondary visit.

4.3.3. Secondary visits will be carried out where significant breaches have been identified. It is anticipated that no more than 30% of planned inspections will result in a secondary visit.

4.4. Complaints and Service Requests

4.4.1. The Food Safety Service aims to investigate all food complaints concerning extraneous matter, chemical or microbiological contamination, unfitness and food alleged to have caused food poisoning, relating to food purchased within Hackney depending on guidance issued by the FSA. Given the projected resources only food poisoning outbreaks (two or more incidents of food poisoning related to the same set of circumstances) will be inspected. Complaints will however be kept on record and will be discussed and included in the assessment of the ratings at the next routine inspection or another scheduled visit, dependent on a new MIS system.

4.4.2. The Service will take receipt of all such complaints in accordance with its food and food premises policy and procedure and will pass on those that are the responsibility of other authorities to investigate.. Complainants will be encouraged to initially complain to the manufacturers or the retailers especially those purchased from a supermarket.

4.4.3. In 2025/26 864 service requests were received. Given the increased number of services requested, a further review has been undertaken in 2025/26 to determine the type of complaints that the Service can continue to investigate given the reduction in resources available and the other demands on the Service. Consideration will be given to the provision of information to customers and the signposting to self-help and advice resources on the Council's and external websites. Work still needs to be undertaken to further improve the website information for businesses and the content will be reviewed and expanded to provide a better resource for both food businesses and the public. Improved access to relevant information and signposting should help to remove some of the demands on the Service. However, the expectations of various stakeholders will be managed as and when they arise.

4.5. Advice and Training to Businesses

4.5.1. The Food Safety Service has produced standards which along with the Food Safety Enforcement Policy outlines the Service's commitment to advising and supporting businesses to comply with the legal responsibilities and good food hygiene and food standard practices. However, given the constraints on resources this will be limited to absolute minimum. To mitigate the effects on businesses they will be directed to seek advice from alternative resources by providing information, advice and online links on the Council's website.

4.6. Food Sampling

The Environmental Health Team successfully secured a total of £21,500 from the Food Standards Agency (FSA) for a project to sample various imported foods in Hackney for contaminants. Initially, £13,500 was awarded to fund 62 samples. Following the successful submission of these samples, the FSA awarded an additional £8,000 in October 2025 to fund a further 40 samples.

In the 2025/26, a total of 173 samples were taken and sent for analysis and examination to the Public Analyst and the Health Security Agency's laboratories. All adverse sample results were followed up with appropriate enforcement action.

4.6.1. A programme of food sampling will be carried out based on national, regional and local, intelligence-led priorities. Sampling may also be carried out in response to complaints and referrals but also during or following a primary inspection. All sampling is carried out in accordance with the Food Sampling Policy and Procedure.

4.6.2. The food sampling programme for 2026/27 will be developed to include London Food Co-ordinating Group (LFCG), FSA and UK Food Security Agency programmes, the North East London Food Sector Group projects and local issues. The extent of the sampling programme will depend on the availability of resources.

4.6.3. The authority has access to two official food control laboratories, one for microbiological examination of food (Food Water and Environmental Microbiology Laboratory run by PHE) and one for food analysis (Public Analyst Scientific Services Ltd).

4.7. Control and Investigation of Outbreaks and Food Related Infectious Diseases

4.7.1. Over 320 infection disease notifications were received in 2025/26 which were all triaged and followed up with obtaining faecal samples when necessary.

4.7.2. The Food Safety Service will investigate all food poisoning outbreaks and notifications occurring in the borough in accordance with the UK Health Security Agency, Local Authority Joint Infectious Disease Protocol and internal procedures.

4.7.3. The Consultant in Communicable Disease Control (CCDC) at the North East (NE) and North Central (NC) London, Health Protection Team of UK Health Security Agency to act as Proper Officer for the purposes of control and management of infectious diseases.

4.8. Food Safety Incidents

4.8.1. The Food Safety Service has arrangements in place to ensure that it is able to implement the requirements of the Food Law Code of Practice in respect of Food Alerts.

4.8.2. A Food Alert ‘for Action’ will be issued by the FSA where intervention by enforcement authorities is required and is often issued in conjunction with a product withdrawal or recall by a manufacturer, retailer or distributor. All urgent food alerts receive immediate attention. Outside office hours the emergency contact arrangements will be used.

4.9. Key Areas for Improvement/Development for the next two years:

What we will do	Purpose	when
Clear backlog of unrated premises and reduce to <70 per month.	Ensure good food safety standards in all unrated premises to reduce the likelihood. Improve overall broadly compliant figures.	2026/27 - 2027/28 Targets to be reviewed and set each quarter
Inspect all unrated (new registrations) premises within 28 days of operating for food hygiene and food standards in accordance with the FSDM and FHDM processes.	To comply with the recently updated Food Law Code of Practice (FLCoP)	Ongoing 2026/27 - 2027/28
Delivery of a risk-based approach for all A, B, non broadly compliant C & D categories of inspections due for food hygiene and food standards interventions as a priority.	To ensure good food safety standards in food premises in the district to reduce the likelihood of food poisoning incidents.	2026/27 - 2027/28 Targets to be reviewed and set each quarter

<p>Adopt, implement and populate the new premises database to enable the analytic functionalities of the system to produce accurate statistics and reports.</p>	<p>Comply with statutory requirements to implement and maintain a food business database with up-to-date and accurate information.</p> <p>Work with ICT and other relevant partners to procure a new MIS to replace the defunct Arcus Global MIS and to roll out mobile working solutions.</p>	<p>2026/27 - 2027/28</p> <p>2026/27 - 2027/28</p>
<p>Effective partnership working</p>	<p>To support the work of FSA, UKSA, DEFRA, HMRC, the Police, Immigration and other relevant internal and external partners.</p> <p>To improve joint working and intelligence sharing within Regulatory Services.</p>	<p>2026/27 - 2027/28</p> <p>2026/27 - 2027/28</p>
<p>Promote the Food Hygiene Rating Scheme</p>	<p>To allow consumers make informed choices, and driving up standards and the economy: Encourage the display of ratings and deter displaying of false ratings.</p>	<p>2026/27 - 2027/28</p>
<p>To revisit all persistent '0' '1' and '2' rated businesses and take focused enforcement actions to bring them into at least the broadly compliant category (category 3 and above).</p>	<p>To ensure that the food businesses in Hackney can be trusted by the residents and those visiting. And to rise in the league of London Local Authorities for broadly compliant premises.</p>	<p>2026/27 - 2027/28</p>

5. RESOURCES

5.1 Resources for 2026/27 - Staffing Allocations

5.1.2 Resource Allocation per Activity

The table below is the estimation of a full time equivalent.

1 year	52 weeks (260 days)
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Annual Leave / Bank holidays	7 weeks (36 days)
Training / briefings etc.	2 weeks (10 days)
Sick leave / dependency / special leave etc.	1 week (5 days)
Number of working weeks	42
Number of working days	209 days
1 FTE	209 days (1505 hours)

The table below lists the estimated time required to complete various key activities:

Work (inc travel & paperwork)	Time (hrs)
Full High risk FH/FS	4.5
Partial Inspection	2.5
Un-rated premises Inspection	4.5
Alternative Enforcement Strategy (AES)	1.0
AES Follow-ups	2.0
Improvement Notices (IN)	2.0
Re- Visits (RV)	2.0
Re-inspection (Chargeable)	2.5
Service Request (SR)	2.0
Approval of Premises*	21.0*
Approval Visits	7.0

*No limits - this is the estimated time

5.1.3 Programmed Inspections

The figures for the inspection programme for 2026/2027 have been calculated using a relatively new Qlick dashboard supplied by IT, the figures may have many anomalies and the data can only be partially relied upon. The Service is working with colleagues in ICT to procure an MIS system. The figures calculated from Qlick are 797 primary inspections due including 208 E category

inspections, 873 new registrations, 120 outstanding unrated, 200 revisits and 30 paid re-rating visits. Our calculations for FTE's below are based on these figures.

Total Resource required for primary inspections = 4040hours = **2.7 FTE**

5.1.4 Re-visits following programmed inspections:

Re-visits will be carried out in premises that are not broadly compliant during their initial inspection, multiple re-visits are needed at some premises. The revisits figure includes the 0-2 FHRS revisits (386), revisits in comparison to last year (156) plus revisits which could include multiple revisits. For both food hygiene and food standards, it is estimated that there will be 542 re-visits @ 2 hours each.

Total resource required for re-visits = 1084 hours (**0.7 FTE**)

5.1.5 Re-inspections requests following programmed inspections (chargeable)

Based on the 2025/26 figures (36) we estimate there will be 45 (2026/7) requests to carry out re-inspection primarily to improve the Food Hygiene Ratings. All re-inspection requests now have to be paid for. The re-inspection charge of £342.00 arrived at through a benchmarking exercise suggesting that this rate needs to increase to £342.00 in 2026/27. As a result of the introduction of new rates there may be a less demand for re-inspection but equally this may drive up compliance as the delivery platforms normally do not let the businesses to use their services unless they have attained '3' or above ratings

Total resource required for re-inspections = @ 2.5 hours = 112.5 hours (**0.07 FTE**).

5.1.6 Service Requests and Complaints

It is expected that approximately 400, based on 2025/26 figures (369), food safety related service requests would be received during the year. These include advice to businesses and members of the public. It is estimated that each will take an average of 2.0 hrs therefore 400 hrs will be required to deal with these.

Total resource required for Service Requests = 800 hours **(0.5 FTE)**.

5.1.7 Infectious Diseases and Outbreak Control

The resource required to deal with an outbreak will depend on the size and complexity of the incident. It is anticipated that during 2026/27 there will be at least two outbreaks requiring extensive investigation and actions. Investigation of any additional outbreaks will considerably reduce resources available in other areas. In accordance with the Memorandum of Understanding agreed with UKHSA, certain infectious diseases are not actioned by the Local Authority. It is estimated that further action (investigation, questionnaires, potting etc.) will be required on approximately 10% of all cases notified (40 cases) (based on a total of 400) will require active investigation or information gathering needs which will on average require 2.00 hours each cases and the rest will be dealt with @ 1 hour each.

Resources required to investigate large outbreaks involving different areas will require at least 7 hours each, for two officers, to contain the outbreak and an additional 7 hours for administration = 21 hours **(0.02 FTE)**

Total resource required for Infectious disease = 80 + 21+ 360 = 461 hours **(0.30 FTE)**.

5.1.8 Food Sampling

Formal and informal sampling (Bacteriological and Chemical) will be based on the Sampling Programmes – which consists of a number of projects co-ordinated by either: FSA, UKHSA, London Food Coordinating Group (LFCG) or the NE Sector Liaison Group, plus a number of local projects and home authority sampling.

- 80 samples @ average 2.5 hours per sample (including paperwork and 30 minutes journey time) = 200 hours
- Follow up to adverse results (20% approx.); 16 @ 1 hours per sample = 16 hours.

Total resource required for Food Sampling = 600 hours **(0.14 FTE)**

5.1.9. Proactive Action Days and Food Safety

No 'action days' were carried out in 2026/27 due to pressures of achieving milestones enshrined in the FSA's Action Plans. However, it is envisaged that at least 2 intelligence led actions days will be organised in areas where there are known problems and it is a

focused way of ensuring businesses are compliant. Each action day (covering approximately 12 premises) involves approx. 6 officers (5 hours per day) = 30 hours per action day and preparation time @ 4 hours each action day.

Total resource required for Proactive Action days = 68 hours (**0.05 FTE**)

5.1.10 Outdoor Events/Markets

One Officer is responsible for all desk top studies and enquiries for validating applications, regarding food safety, food standards and health and safety hazards, that are requested from the events team and the public.

Total resource required for outdoor events is 36 hours per year on average: (**0.02 FTE**)

5.1.11 Health & Safety Functions

Resources required to discharge Health and Safety Functions and Statutory responsibilities (**0.9 FTE**)

Please click on the link below for details:

<https://docs.google.com/document/d/1bjm39-WH12x9UkKp7Vh7bkCCxNwBS8dwct7GSxYttnQ/edit?tab=t.0>

5.1.12 Resources needed for the migration, checking, cleansing of data within Appsheet and Qlick are essential until the procurement of an MIS. We estimate this to be 816 hours per year. Reporting into the Halo system. This will also require that for the first 6 months into the delivery of the service a dedicated officer's input to for the resolution of the ICT related issues: **0.5 FTE**

5.1.13 Enforcement/Prosecution/Legal work (including Hygiene Improvement Notices, seizures, closures)

Estimations of resource requirements for enforcement actions

Type of enforcement	Number estimated 2025/20	Estimate of hours	Total hours
Hygiene Improvement Notices	30	2 hour/notice	60
Hygiene Emergency Prohibition Notices/Orders	10 (anticipated)	180 hours	280
Voluntary Closures	5	10 hours	50
Seizures and detentions	5	18 hours	90
Prosecutions	2 anticipated	72 hours	144
			624

Total resource required for enforcement work = 624 hours **0.4 FTE**

Total staff to carry out non-inspection and enforcement work : 3.58 FTE*

*This comprises of Re-visits following programmed inspections 0.7 FTE, Re-inspections requests following programmed inspections 0.07 FTE, Service requests and complaints 0.5 FTE, Infectious Diseases and Outbreak Control 0.30 FTE, Food Sampling 0.14 FTE, Proactive Action Days and Food Safety 0.05 FTE, Outdoor Events/Markets 0.02 FTE and Enforcement/Prosecution/Legal work (including Hygiene Improvement Notices, seizures, closures) 0.4 FTE, IT tasks 0.5 FTE, Health and Safety 0.9 FTE

5.1.14 Administration

The responsibility of carrying out most of the administrative functions including triaging of new registrations, have fallen to the EHM's, some of which are still not automated through the new database and can only be carried out by the EHM's) = **0.50 FTE**.

Updating of procedures notes, SOPs, acquisition of statutorily required CPDs, updating of Council's website, disciplinary actions, attendance at meetings and training courses, Check-ins, maintenance of equipment etc are integral part of the EH team and require significant time commitments. It is estimated that cumulative time commitment will be approximately 300 hours = **0.2 FTE**

5.1.15 Technical Business Support

The technical Business Support team had previously been responsible for supporting officers which has now been curtailed. This support was equivalent to 1.0 FTE. The EHMs will absorb half of this support leaving a 0.25 FTE shortfall in their activities and for maintaining land registry searches, processing purchasing orders, corporate complaints and FOIs etc. = **0.50 FTE**.

5.1.16 Resource allocation by Activity

Activity	FTE
Programmed Inspections due 2026/27	2.7
Re-inspections requests following programmed inspections (chargeable)	0.7
Re-visits following programmed inspections	0.07
Service Requests and Complaints	0.5
Infectious Diseases and Outbreak Control	0.30
Food Sampling	0.14
Proactive Action Days	0.05
Outdoor Events	0.02
Enforcement/Prosecution/Legal work	0.4
Administrative Tasks	0.2

ICT preparation work	0.5
Health and Safety	0.9
Approximate total <u>EHS</u> field resources required to fulfil the plan for 2026/27**	6.48
Administration (EHMs)	0.50*
Resources available for this plan **	5.98 FTE**

*Not counted towards service delivery ** excluding outsourced resources

** Please see calculations below for a full details

5.1.17 The available staffing resources for food safety and health and safety function for 2024-25 are as follows:

0.3 FTE x Regulatory Services Manager (RSM)

2.4 FTE x Environmental Health Manager (EHM) (0.9, 0.6, 0.9 FTEs) 28, 26, 21.6 including one on a fixed term contract till September 2026

3.0 FTE x Senior Environmental Health Officer (SEHO)

2.0 FTE x Environmental Health Officer (EHO) - (Plus one to be recruited- vacant)

0.5 FTE x Business Support Officer (BSO)

Total Field Staff available in EHS: 5.5 FTE

- Total staffing resources available to deliver this plan: **5.08 FTE**
- Total resources required for statutorily required inspections: **2.7 FTE**

- Total resources required for non programmed inspections, excluding admin work: **3.58 FTE**
- Staffing resource required to deliver the FLESP = **FTE 6.28**
- Deficit of staff required to deliver 2026/27 food service plan **0.3 FTE (Deficit)****

****Deficit would be 1.3 if the vacant position is not filled**

5.2 Authorisation and Competencies in line with new requirements of CoP

5.2.1 All Officers are authorised in accordance with the Authorisation, Induction and Training Procedure and their competencies assessed against the framework contained therein.

5.3 Staff Development Plan

5.3.1 Regularly held check-in meetings, for all staff, take place every 4-6 weeks. During these regular meetings personal development needs are assessed and Identified needs and plans for developments are facilitated and progress monitored on a continual basis.

5.3.2 All staff complete a 'competency framework' questionnaire on a periodic basis (as Food Law Code of Practice) to ensure that the officers have acquired the updated knowledge, skills and competencies to perform statutory functions.

5.3.3 All training records are maintained in accordance with the Authorisation, Induction and Training procedure.

5.3.4 Officers will be assisted in achieving 20 hours' Continual Professional Development (minimum 20 hours food law related).

6. QUALITY ASSESSMENT

6.1 Internal Arrangement

6.1.1 Arrangements include:

- Fortnightly priorities meetings
- 6 weekly check in's
- Monitoring arrangements to assess the quality of food enforcement work and compliance with the Food Law Code of Practice and internal procedures.
- Development needs assessments (competency framework)
- Cascade training and team briefings
- Accompanied/validation inspections
- FSA CPD

External Arrangements

6.1.2 The service will submit a 6 monthly return to the FSA, as required by the Food Standards Agency.

6.1.3 Hackney's FHRS data is uploaded to the FSA's National platform on a regular basis.

6.1.4 The service participates in activities with other North East London Sector Food Liaison Group to share good practices. Lessons learned will be used to develop a consistent approach across the sector.

6.1.5 The service participates in programmes devised by the FSA, Public Health England, the London Food Co-ordinating Group, and the Chartered Institute of Environmental Health Officers.

Annex 1 - https://docs.google.com/document/d/13och3iBS4l1zvwSMCw-nYCy1aKYR4NmP2bkUUmZh_dU/edit

Annex 2 - <https://docs.google.com/document/d/1bjm39-WH12x9UkKp7Vh7bkCCxNwBS8dwct7GSxYttnQ/edit?tab=t.0>