



Chartered
Institute of
Environmental
Health



Food Safety and Standards Management Strategy **Olympics/Paralympics 2012**

May 2011

Credit: London 2012

Acknowledgements

The document has been developed through the contributions of a multi partner planning group and consultation approach. This has involved engagement with host local authorities, other interested local authorities, Health Protection Agency (HPA) , Killgerm, Association of London Environmental Health Officers (ALEHM), Trading Standards Institute (TSI), Local Government Regulation (LGR formerly LACORS). The development of the strategy has received the full support of the Food Standards Agency (FSA) and has been facilitated by the Chartered Institute of Environmental Health (CIEH).

Contents

Forward	5
1. Aim	6
2. Food safety challenges	7
3. Developing a food safety and standards management strategy	10
4. Mobile catering at outdoor events	13
5. Compliance management programme	15
6. Food standards	18
7. Community events	20
8. Bed and breakfast/hospitality sector	22
9. Food/water related infectious disease surveillance/management	23
10. Healthy eating and health and wellbeing	26
11. Food incidents, emergencies, resilience and crisis planning	27
12. Sustainability (environmental factors, diversity, food sourcing and waste)	28
13. Capability and capacity building	29
Annex 1: Purpose and composition of food strategy management group	31
Annex 2: Food challenges in London	31



Forward



The London Olympics and Paralympics in 2012 will be the largest ever peacetime project in the UK. Over the period of the games it is estimated that there will be over 450000 extra visitors staying in London alone and over 5.5 million day visitors with events and activities spread throughout the country. 17 Local authorities will be hosting competition venues, 9 outside London, 19 with live sites. The workforce alone will number 200,000, utilising 70,000 volunteers.

The Chartered Institute of Environmental Health established in 1883 is the professional and educational awarding body for environmental health practitioners. Its Royal Charter, charitable mission, training courses and services are dedicated to the protection and promotion of the health of people. Our branded crest is the mark of quality assurance world wide. The holistic approach of environmental health takes into account all the potential impacts to health by external factors such as air quality, food safety, workplace safety, environmental pollutants, infectious diseases and housing standards and aims to remove or reduce risk. In the context of the London Olympics it is vital for the health and safety of all those involved that planning for the event and its impacts take all those aspects into account, is coordinated, thorough and consistent.

The Council of the CIEH has committed its charitable professional resources to provide support, guidance and assistance for the period leading up to and beyond the games and to provide a legacy for good environmental health management for future events of this size and complexity wherever they may be held throughout the world.

The CIEH is working closely with all the agencies involved in planning for the games and this guide on food safety management is amongst a series that has been produced to support the planning process and through them a consistent approach to a safe games.

The production and compilation of this guide has been led by Sharon Smith, Jenny Morris and Tay Potier and my thanks go to them and to all those who have been directly or indirectly involved in their development.

Failure to plan is planning to fail - we aim to help make these Games the safest and most successful with a lasting legacy of good practice on environmental health implementation for use by future generations.

A handwritten signature in black ink, appearing to read 'Graham Jukes'. The signature is stylized with large, sweeping loops.

Graham Jukes
Chief Executive

1. Aim

- 1.1 The aim of this report is to outline a multi component strategy towards achieving food safety and standards in food outlets around Olympic/Paralympic venues in London and within the UK as well as other key tourist and visitor locations.
- 1.2 The strategy attempts to highlight the complexity of the impact that food safety and standards has on public safety and the need to incorporate food safety planning within the preparations and implementation programmes for the Games. The document also aims to link to other key development and planning programmes for London 2012 working towards a co-ordinated and multi agency approach. The aim is not to duplicate but focus on the main areas of priority and higher public health risk. The strategy is supported by separate more detailed management plans where relevant.
- 1.3 The report does not address the food safety and hygiene standards within the Olympic/ Paralympic venues as this is within the remit of the Joint Local Regulatory Services, Host Authorities (JLARS) enforcement protocols, other host authority jurisdiction and the London Organising Committee for the Olympic Games and Paralympic Games (LOCOG) food vision and sustainability management. However, it is intended that the development of any related strategies will be in close consultation with these groups to ensure professional consistency, transparency and proportionality.
- 1.4 The strategy will feed into relevant national and regional fora in relation to environmental health delivery and into the relevant work streams for the planning and preparation of London 2012. It aims to inform local decision making and service planning to ensure an effective and appropriate environmental health response to protect public health and wellbeing.
- 1.5 The document also acknowledges the transformational power of the Olympics/ Paralympics and can contribute to driving aspirational food safety standards. It is recognised that the strategy will only succeed if all partners and stakeholders co-operate and are prepared to work together as a team.
- 1.6 The document has been produced through the London 2012 Food Strategy Planning Group, a multi partner group, facilitated by the CIEH and supported by the FSA. Annex 1 provides details of the terms of reference for the group and membership.
- 1.7 There is a great deal of reference material available on the London 2012 website and it is recommended to directly access this material to support the relevant areas within this document: www.london2012.com

2. Food safety challenges

Food safety risks

- 2.1** Previous Olympic and Paralympic Games have classified the risk of food borne and water borne diseases occurring in the run up to and during the Olympic period as high due to the requirements for:
- Increased production of large quantities of food and drink
 - Transportation of large volumes to tight deadlines
 - Increased and fluctuating demand
 - Increased presence of outdoor/mobile vendors
 - Large numbers of food premises in densely populated capital city and other urban areas
 - Large numbers of temporary structures and temporary staff
 - Other unusual factors such as cruise ships in attendance
 - Impact of negative PR of any incident on UK as world destination.
- 2.2** The impact of the Games is much wider than the main competition venues of which there are 31. There is to be 44 non competition venues, 23 Games time training venues and four villages. It has been anticipated that there will be 17.6 million potential users throughout the UK. The Olympics/Paralympics is a truly national event and will need a nationally consistent and proportionate response. Annex 2 details specific food safety challenges for London.

Prioritisation and risk assessment

- 2.3** In line with the current approaches to ensure that services are targeted, proportionate, consistent and transparent, the CIEH set out to establish a framework for discussing and planning food safety performance in respect of London 2012. In September 2008, the CIEH set up an initial meeting to discuss the scoping and capacity for food safety leading up to and during Games time. A priority needs/risk assessment was undertaken by representatives of host authorities in London and other key stakeholders such as the CIEH, FSA, HPA, LGR, public health laboratories. The main issues affecting food safety to the public outside of the Olympic Park/venues emerged as:
- Mobile vending – enforcement issues and management strategy
 - Raising compliance in existing food outlets/businesses around the venues
 - Community events – as part of the Cultural Olympiad
 - Bed and breakfasts and other hospitality sector
- 2.4** The meeting also acknowledged that food safety required a graduated approach which necessitated the initial focus to be on wider food safety management across London and UK host authority areas and increasing focus around the Olympic Park and other key venue and tourist sites nearer Games time. This approach follows the experience and management of food safety in both Sydney (Operation Food Check) 2000 and in Athens in 2004. The recent Vancouver Winter Olympics/Paralympics also followed a similar approach.

Food safety challenges

LOCOG Food Sustainability Strategy

2.5 The LOCOG Food Vision, launched in December 2009, has been informed by two pieces of research commissioned by LOCOG which helped identify the framework and the scope and requirements for catering and food services at the Games. The food vision has five key themes:

- Food safety and hygiene
- Choice and balance
- Food sourcing and supply chain
- Environmental management
- Skills and education

2.6 LOCOG will be working with others to deliver a sustainable catering operation. This has involved the establishment of a Food Advisory Group to help steer the development of the strategy and develop a Food Charter - a campaign to encourage organisations throughout the events, catering and hospitality sector to commit to supporting and implementing local, seasonal, healthier and sustainable standards across the industry. Representatives from the CIEH and the FSA sit on and help inform the LOCOG Food Advisory Group.

2.7 Olympic/Paralympic catering is recognised as the “largest peace time catering operation in the world” and London 2012 is planning to serve an estimated 14 million meals over 40 locations. The LOCOG food vision recognises food safety as the highest priority from food supply and premises design to transport and management systems. The food vision document acknowledges the contribution and assurance offered by local environmental health services.

2.8 LOCOG launched its Food Vision in December 2009:

For starters we’ll have a tastier, healthier, greener Games.

- We will enhance everyone’s experience of the Games by celebrating the great diversity and quality of British food and drink, and delivering it at affordable prices.
- By nurturing commercial and educational partnerships, we will leave a strong, sustainable legacy for London and the UK.

Link : www.london2012.com/documents/locog-publications/food-vision.pdf

2.9 LOCOG is also aiming to launch a more wide reaching food charter in early 2011 that aims to extend the influence of the Games and leave a sustainable and lasting legacy for businesses and communities.

Joint Local Regulatory Services and Host Authorities

2.10 The London host boroughs come together in a number of fora to discuss and plan the regulatory aspects of the Games. Joint Local Authority Building Control (JLAB) and the JLARS are two examples of these groups. Funding from the Olympic Delivery Authority (ODA) provides the £5million to the Olympic Park host boroughs for regulatory services. The function of the JLARS is to consider and develop protocols for regulatory standards and enforcement within the Olympic Park. The JLARS Food Safety working group have produced a suite of protocols including a ‘Statement of Intent’ that outlines the service that the host authorities will be providing to the Olympic Park in London. The work of JLARS and the developing action plans are outside the remit of this report. However, the groups work closely together to ensure consistency in policy and practice.

Food safety challenges

Reporting lines and links to other groups and networks

- 2.11** The London 2012 Food Strategy Planning Group is supported by the FSA and is facilitated by the CIEH. The group, for the interim, reports through the NHS London and HPA jointly led public health work stream. This reports into the Olympic and Paralympic Health Programme board chaired by the Department of Health, which in turn reports into health ministers and the Secretary of State. The FSA remains, however, the main accountable agency for food safety and standards policy and practice.
- 2.12** However, there are a number of other groups and networks that the strategy will need to tie into including London Councils, City Operations, Government Olympic Executive and others as part of the wider public health, safety and wellbeing. This will include links with other important stakeholders such as Health & Safety Executive (HSE), fire authority and others.

3. Developing a food safety and standards management strategy

Strategic goal

- 3.1 To achieve world class food safety standards in food outlets around Olympic/Paralympic venues, in London and within the UK and other key tourist and visitor locations.
- 3.2 As part of this to achieve:
 - The highest possible level of food safety/standards with respect to production, import, transport, sale and distribution during the 2012 Olympic/Paralympic

Games in order to protect the health and wellbeing of athletes, visitors and the public

- Preparedness for food safety crisis/incident/infection to protect public health
- A fully integrated programme of activity that promotes health, safety, wellbeing and sustainability around food service
- Service planning based on support, guidance and proportionate regulatory service to business



Fig 1 Food safety/standards strategic components

Developing a food safety and standards management strategy

- 3.3** The strategy recognises the interrelationship of multiple areas that together provide a holistic approach to ensuring that the food and beverages available to visitors and the public are safe and wholesome. Although many of these functions may be aspirational in the current economic climate and resource stress that many organisations and local authorities are facing, the strategy aims to achieve a primary level of public safety and wellbeing. Training, monitoring and support initiatives will need to underpin all of the strategic elements.

Strategic priorities- phasing

- 3.4** The developing strategy acknowledges that there needs to be a graduated approach to action:

2010

Initial planning and preparedness- this involves the scoping and needs assessment together with planning the wider food safety improvement activities, developing protocols and building capacity through training and development of professionals and food business/industry.

2010 – 2011

Intermediary planning/implementation - this phase involves more intensive activity focussing on specific priorities and food industry sectors. Closer integration of protocols across venue/authority areas, joint warranting procedures and testing of emergency plans and crisis management.

2012

Final implementation -this phase will involve an intensive programme of audits in venues and immediate environs as well as a focus on primary tourist and visitor sites.

Games time (24/7)

Auditing and management protocols, single point of contact for complaints, ID protocols actioned as necessary.

Review(Oct 2012)

Feedback and review from all partners involved in food safety management to highlight and record learning outcomes.

Levels of food safety/ standards service

- 3.5** The strategy developed is aspirational and aims to influence the local authorities and other stakeholders who have the democratic accountability for public safety within their localities. The success and service standards will be determined by resource allocation and finance supporting the implementation by local authorities responsible for the auditing and enforcement protocols of food outlets in their areas. For these service providers there will need to be in depth and practical consideration of the component factors including:

- Staffing - volunteers, expenses, accommodation, training, full time staff, back filling
- Training - professionals, volunteers
- Business support
- Sampling budgets
- Enforcement - legal costs and seizure arrangements
- Communications - supporting material, health promotion, PR

Developing a food safety and standards management strategy

3.6 The level of resource allocation is influenced by local availability and political support as well as the priority of food safety identified nationally and locally. The recession is also likely to impact on agency and authority ability to support programmes but also will impact on individual and food business

response. The CIEH and the FSA are committed to supporting the service providers to achieve the highest and most effective use of professional resources in achieving the strategic goals. The strategy will also aim to support business achieve the highest levels of food safety to the public and consumers.

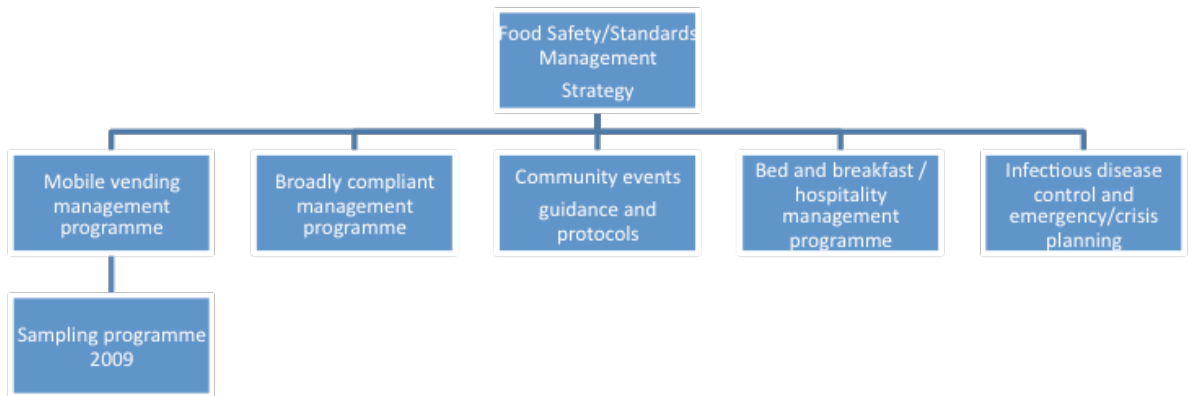


Fig 2 Food safety and standards management strategic components:

Communicating the strategy

3.7 The strategy has been developed through a multi partner group and will be disseminated for consultation and further discussion and development to the widest relevant audience. The strategy recognises that as a living document the principles and processes will be under constant scrutiny and review.

3.8 All available professional networks and local government and key stakeholder pathways will be utilised to achieve the widest dissemination of the strategy and to inform future developments through experiential/ peer review.

4. Mobile vending and catering at outdoor events

- 4.1** Catering at outdoor events is a high risk activity whether at an established venue, market or at a temporary or mobile function. The large numbers of people, frequent use of temporary staff, the temporary nature of the accommodation and high-risk products for sale place specific pressure on food and health and safety management. The temporary nature of these events and the uncertainties of the UK weather can mean that environmental conditions are an added challenge to traders. Experience at some of the largest outdoor events such as the Olympics, has emphasised the risks associated with food handling and cross-contamination under these circumstances. The 2009 Sampling Survey (HPA and LGR) highlighted that the Sampling Officers judged the food safety procedures to be adequate in 66% (226/318) of the vendors visited as part of the survey targeting mobile vendors at large green field events. Where procedures were not considered to be adequate, reasons for this assessment included inadequate temperature control, poor facilities for hand washing, inappropriate cleaning procedures and dirty conditions. This highlights the importance of prioritising these types of food businesses leading up to and during Games time.
- 4.2** The total number of registered mobile vendors nationally (NCASS 2008) is 9,130. This is likely to be a severe underestimate as local environmental health experience has shown that large numbers of “mobile food vendors” can turn up at every major event—even on private front gardens adjacent or on route to an event. It is anticipated that for the Olympics/Paralympics that the inspiration to make money and the ease in which this could be achieved due to increased numbers of visitors will encourage individuals to attempt to sell food items in this way.

- 4.3** The experience in some parts of London and other urban areas is that mobile food vending is tightly connected to crime and gangs and will therefore involve partnership working with the police.

Developing a management strategy

- 4.4** There needs to be a clearly developed management strategy to deal with the potential for large numbers of mobile and street food traders that can be applied not only in London but in other key areas associated with Games venues, access routes and car parking/transport, cultural events and open screen sites.
- 4.5** The Mobile Vending Planning 2012 Strategy Group is currently leading on developing a management strategy to address issues such as:
- Food hygiene and safety
 - Licensing and street trading
 - Registering of the food business
 - Equipment sourcing
 - Visitor movement and transport hubs
 - Health and safety
 - Food supplies and local sourcing
 - Food storage
 - Food standards and labelling/ trading standards
 - Criminal activity
 - Enforcement and prosecution protocols (policing of this)
 - Seizure of food and equipment
 - Information and training/support to existing and potential new businesses

Mobile vending and catering at outdoor events

- 4.6** The anticipated people movement per day associated with the Olympics/Paralympics will provide the opportunity for sales at a variety of transport and visitor hubs:
- 4.7** Daily figures of people movement have been estimated as -140,000 staff/volunteers; 500,000 visitors; 50,000 athletes. The Javelin train from St Pancras/Ebbsfleet to Stratford will be taking an estimated 25,000 passengers per hour. Gateway stations such as Stratford (regional and international) and West Ham are expected to take 58% of visitors to the main Olympic Park.
- 4.8** The CIEH has already issued a document that provides guidance to environmental health practitioners on managing food safety at outdoor events and mobile catering opportunities. Further support programmes will be developed with industry representatives to help inform and support local food businesses. This will link to the above management strategy and enable a legacy to be achieved of improved and consistent and proportionate compliance support for mobile and outdoor caterers.
- 4.9** LGR and FSA food sampling programme will provide valuable insight into potential sources and problem areas for this sector.

Further information

- Mobile vending management strategy and related documents www.cieh.org
- Guidance on outdoor and mobile catering CIEH June 2010 www.cieh.org
- Large Scale Events Report www.lgr.org

Action planning summary

2010

Develop and consult on plan and develop support for business programme Train professionals

2011

Implement support for businesses and review protocols and resource availability

2012

Test exercise- management protocols

5. Compliance management programme

Rationale

- 5.1** In 2007, the Rogers review set the national enforcement priorities for local authority regulatory services. It identified “hygiene of businesses” as one of the top five enforcement priorities due to the high impact on public health and the potential losses to the economy. The high profile of the Olympics would magnify any negative publicity received around standards of hygiene, safety and healthy food supplied leading up to and during the Games in 2012.
- 5.2** From the data collected from local authorities (Local Authority Enforcement Monitoring System (LAEMs) March 2010) the total number of UK food establishments is 561,454 (as at March 2009). Local authorities carried out 0.5 million on site interventions during 2008/09. 86% of the UK food establishments were considered to be “broadly compliant”. The percentage of broadly compliant “take away establishments” was 69% and was the lowest of all the food business types. From the complaints that have been received by local authorities regarding food safety/standards and hygiene throughout 2008/09:
- 33% related to food safety
 - 48% related to hygiene standards
 - 19% related to food standards (composition and labelling)
- 5.3** The FSA LAEMs data (March 2010) identifies over 63,859 food business exist within London boroughs. From recent data (2008) London boroughs have experienced between 20-40% business turn over within this sector. This makes long term management strategies difficult to implement and evaluate as relationships with individual businesses/proprietors cannot necessarily be maintained. It is anticipated that the very nature of the Olympics/Paralympics may increase the likelihood of new start up businesses in tourist hot spots.
- 5.4** From data received from ALEHM (2009) it has been estimated that on average each London authority would require between 300 and 900 days full time equivalent regulatory activity to address premises identified as not currently achieving “broadly compliant”. This already means that for some local authorities there is insufficient time to meet full compliance without significant additional resources. Full compliance may be an aspirational standard and a more realistic approach is a graduated and prioritised approach that focuses on significant non compliance (risk based) and on key local hot spots.
- 5.5** From the data taken from the online Scores on the Doors (SOTD) database, each London borough has between 150-450 zero and one star rated premises that demand urgent attention and enforcement support. If the average audit and support action is considered to be 14 hours of officer time (based on average London salary £40k) this will equate to an estimated £43,660-£130,977 resource required to address the current levels of significant non compliance. Additional support will need to be given to new businesses and this will be an additional cost to service delivery.
- 5.6** Many of the hosting authorities have now undertaken their own calculations for additional impact on services during Games time. This information linked to actual costs when reviewed will provide useful learning to inform future strategies.

Developing a management strategy

- 5.7** The management strategy will need to tie in closely with the protocols being developed within the host authorities and with the contractual standards for the Olympic venues set through the LOCOG Food Advisory Group. The strategy to improve food business

Compliance management programme

compliance will need to link together action on a number of drivers:

- Enforcement policies
- Compliance management strategies such as SOTD, Food Hygiene Rating System and Safer Food Better Business (SFBB)
- Business information, training and support programmes
- Wider regulatory partnership projects
- Out of hours and emergency response

Scores on the Doors or Food Hygiene Rating Scheme

- 5.8** One of the key elements of the compliance management programme is the existence and continued development /implementation of these types of schemes. These schemes are one way of improving compliance standards within food businesses and allowing consumers to make informed choices. Schemes use the internet to publish a star rating derived from the most recent local authority food hygiene inspection. Businesses are also given a sticker and certificate with their rating on and encouraged to display them.
- 5.9** It should be noted is not mandatory to display this information in the UK although the London is attempting to pass local legislation through Parliament to require display in the capital. The scores given are derived from the assessment made of the level of compliance with three core elements: food safety and hygiene procedures; structural integrity of the premises and confidence in management/ control procedures.
- 5.10** Other important developments in this area include iPhone apps and WAP browsing so users can look up information as they are on the move.

Safer Food Better Business (SFBB)

- 5.11** SFBB is an innovative and practical approach to food safety management. It has been developed to help small businesses put in place food safety management procedures and comply with food hygiene regulations. This has been grant aided through the FSA and has proven to be a useful source of help and support.
- 5.12** There are a number of SFBB packs available which are designed to meet the specific needs of different food businesses. There are packs for small catering businesses, small retail businesses and restaurants and takeaways that serve different cuisines, such as Chinese or Indian, Pakistani, Bangladeshi and Sri Lankan cuisines. There is also a supplement for care homes that is designed to be used with the pack for caterers.

Improving levels of broadly compliant premises

- 5.13** The numbers of broadly compliant premises vary from authority to authority. The percentage of broadly compliant businesses depends on a range of factors including historic policy and practice within the authority as well as resources, local priorities and local economic landscape. From the data collected from the London authorities (ALEHM 2009) it has been estimated that the average percentage of broadly compliant premises is around 80%. This leaves 20% of food premises as a focus for priority attention as part of the compliance programme (Nationally this figure is 14% of food businesses). This will of course vary considerably locally. The recent LAEMs data (March 2010) show that for London the percentage of “broadly compliant” food premises across the boroughs ranges from 44.2% to 96.9%. The strategy aims to:

Compliance management programme

- Promote locally determined programmes for improving compliance (Local Improvement Plans)
- Support tougher enforcement on significant non compliant premises
- Develop supporting initiatives to aid business compliance such as SFBB
- Develop supporting information to the public about compliant premises
- Develop comprehensive professional development programme to support capacity and confidence, consistent assessment and enforcement
- Explore additional ways of sharing resources

Port Health – food safety

- 5.14** The Thames will be an important feature in the visitor experience of London 2012. It also provides for further access and transport to London venues. This includes river transport but also larger liners and cruise ships. The Greenwich Mooring (Millennium) as well as mooring alongside the Belfast are fully booked for the whole period of the Game. In addition there is also interest in the three docks at The Royals (at present an interest by 6-10 vessels). The West India Docks currently have three Super Yachts booked for the Games period.
- 5.15** Following the lessons learned in Canada, Port Health intends to manage daily inspections or requirements of Declarations of Health on a daily basis. The biggest concern is infectious disease control.

Action planning

2010

Agree compliance improvement strategies and enforcement protocols for across London and wider venue applications. Develop capacity support and Local Improvement Plans

2011

Implement compliance improvement strategies with business support programme and structure focused approach Hygiene rating scheme-SOTD/SFBB programmes ongoing. Define enforcement strategy training and protocols

2012

Implement focussed improvement strategies and focussed business support programme. Test protocols

Further information

- Food Vision LOCOG Link: <http://www.london2012.com/documents/locog-publications/food-vision.pdf>
- FSA Enforcement Statistics 2008/09: <http://www.food.gov.uk/multimedia/pdfs/board/fsa100309v3.pdf>
- FSA food enforcement : <http://www.food.gov.uk/enforcement/enforcework/framework>
- CIEH Food policy and related documents : www.cieh.org

6. Food standards

Rationale

- 6.1. Food standards cover a wide breadth of food law and is integral to many of the strategic components to this strategy. Examples of clear links include: The increased risk of food fraud posed by mobile vending and the temporary nature of community events; false claims as to the composition of food through the lack of knowledge of new hospitality providers; sustainability links to misleading claims around the origin of “local” food; choosing healthier options is made easier through an understanding of clear food labels; UK production for increased markets; diversity of products; increase in imported food.
- 6.2. Nationally food fraud is a growing area of concern and this is likely to be a continued area of priority, Food fraud occurs whenever food is deliberately placed on the market, for financial gain, with the intention of deceiving the consumer. There are two main types of food fraud: The sale of food that is unfit and potentially harmful; and the deliberate misdescription of food deceiving the consumer as to the nature of the product. Food fraud that causes a potential public safety threat such as counterfeiting, altering food durability markings and non disclosure of allergens will have a higher priority.
- 6.3. Intelligence is key to directing work in this area. The new single national intelligence database for trading standards should assist greatly in identifying current and future threats. Intelligence from other partners such as the FSA and the Public Analyst Service will also assist in directing this work.
- 6.4. The FSA Food Fraud Advisory Unit provides an advisory resource for local authorities carrying out investigations into food fraud and any illegal activity relating to food and animal feed. The FSA Fraud database utilises specialist intelligence reports and is able to

incorporate powerful searching capabilities to help inform local and national investigations. This database will be a critical tool for local authorities in the lead up to and during Games time to keep track of any suspicious or known fraudulent activities relating to food.

Developing a management strategy

- 6.5. The Food Standards Management Programme will need to be developed with consideration of issues such as:
 - Food fraud - counterfeiting, substitution, adulteration, composition, descriptions, claims, labelling, approvals
 - Food labelling - clear labelling, allergens, use by dates
 - Alerts - withdrawals and recalls for action
 - Imports
 - Contamination - Historically Sudan 1, dioxins in meat, melamine in milk powder
 - Traceability - Including claims as to place of production or origin.
 - Essential packaging - sustainability and sourcing
 - Enforcement policies - local, regional, national
 - Sampling and analysis protocols
- 6.6. Horizon scanning may show other areas of priority closer to the Olympics and any management programme must address the need to have appropriate resources in place to respond to the threats at that time.

Food standards

Action planning

2010

Development of Food Standards Plan.

2011

Consultation on Food Standards Plan.
Draft Media strategy. Awareness raising of challenges for service e.g. Council Members.

2012

Media strategy (consumer and business).
Level enforcement. TS professional resources.
Business training/ support. Increased awareness raising. Media strategy (Consumer and business). Increased enforcement. TS professional training. Business training/support.

Further information

- London Trading Standards Olympic Strategy Group : Sarah.copley@lotsa.org.uk
- FSA's food fraud resources : www.food.gov.uk/enforcement/workwithenforcers/foodfraud/
- Trading Standards Institute: <http://www.tradingstandards.gov.uk/>

7. Community events

Rationale

- 7.1** Catering at outdoor events is a high risk activity due to the large numbers of people, frequent use of temporary staff, the temporary nature of the accommodation and high-risk products for sale. The temporary nature of these events and the uncertainties of the UK weather can mean that environmental conditions are an added challenge to traders. Experience at some of the largest outdoor events such as green field events, such as Glastonbury and street carnivals, have emphasised the risks associated with food handling and cross-contamination under these circumstances. The mass gathering of people will pose additional crowd control and other on street public health and safety issues.
- 7.2** The Large Event Sampling Survey undertaken in 2010 identified food safety procedures to be adequate in 66% of the vendors visited. Where procedures were not considered to be adequate the main reasons for this were inadequate temperature control, poor facilities for hand washing, inappropriate cleaning procedures and dirty conditions. The survey showed that for 59% of the vendors sampled their personnel were deemed to have received adequate training for food safety. Of the 457 samples of ready to eat food collected as part of the survey 8% were of unsatisfactory quality and 2% were considered potentially hazardous (*Bacillus* species). Almost one quarter of the unsatisfactory or potentially hazardous samples came from vendors that were not considered to have adequate food safety management in place. A total of 332 water samples were collected and overall the results show that 52% were unsatisfactory due to the presence of coliforms.
- 7.3** The previous LACORS/HPA study focussing on mobile vendors (Little and Sagoo, 2009) involved the collection of the majority of

samples on a Tuesday or Wednesday (C. Little, HPA, unpublished data). However, the more recent survey did take samples across the whole week and there was no significant difference between the weekdays and weekend samples that were taken.

- 7.4** With the encouragement of the Cultural Olympiad to “humanise” public spaces and to be as inclusive as possible, all types of street and community events and activities may be planned. Licensing of these events is likely to be under Temporary Event Notices and therefore will need explicit processing and planning protocols between local authority, licensing authorities and police. It is also anticipated that these events will increase in numbers and frequency closer to Games time and will further stretch already tightly managed resources for food safety, enforcement and trading standards.

Developing a management programme

- 7.5** The community event management programme will rely on locally determined resources to respond to community enthusiasm in celebrating London 2012. The mobile vending strategy will cover many aspects of the temporary nature of the events and there is already a wealth of guidance for regulators and businesses on safe practice.
- 7.6** Local management programmes will need to be developed around consideration of:
- Licensing conditions, protocols, capacity, communication and partnerships with others such as the police
 - Information, support and promotion of best practice to community groups and organisers

Community events

- Multi agency fora for planning and co-ordination such as the Safety Advisory Groups or similar
- Liaison with tourism, culture and LOCOG regional promotion sectors

7.7 The CIEH has produced guidance relating to outdoor and mobile catering. The document is aimed at the environmental health professional/service but also provides template documents and support guides for improving contact with relevant food business operators. Opportunities for professional workshops and sharing of expertise will be supported nationally and regionally.

7.8 The business sector has been involved from the early concept of the guidance and has contributed to the consultation and professional workshops. It is further anticipated that the programme will encompass an awareness raising campaign among relevant food businesses to clarify expectations and standards when catering in outdoor and mobile situations. It is also anticipated that the opportunity to extend the guidance and information support to business to other linked regulatory areas would be maximised. The earlier planning takes place for the larger events the more effective the management and controls are likely to be.

Action planning summary

2010

Dissemination of guidance and continuation of professional training/support.

2011

Business support and information. Wider regulatory support and information

2012

Test protocols. Intensive information programme for business

Further information

- Guidance on Outdoor and mobile catering CIEH www.cieh.org
- London 2012 Mobile Vending Management Strategy www.cieh.org
- An Evaluation of Hygiene Practices in Catering Premises at Large Scale Events in the United Kingdom with a Focus on Identifying Risks for the Olympics 2012: LG Regulation /HPA Co-ordinated Food Liaison Group Studies: Correspondence to: caroline.willis@hpa.org.uk

8. Bed and breakfast/hospitality sector

Rationale

- 8.1** This sector was initially prioritised due to the potential risks to visitors to London and relevant tourist locations at Games time through newly established hospitality premises or through existing establishments attempting to increase numbers of through put or accommodation provided. Currently the estimated visitor numbers for the Olympics/Paralympics is over 7 million (7.7 million tickets for Olympics and 1.5 million tickets for Paralympics). It is also anticipated that 75% of visitors to London will be from the outside of the capital (45% UK /30% overseas).
- 8.2** From the Visitor London data sets there are currently 1,273 hotels (100,000 rooms) in London, 623 bed and breakfasts, 232 self catering premises. A further 30,000 rooms are provided within 144 hostels and campus premises. There are ten home stay agencies offering a range of accommodation in existing homes and 15 camping and caravan sites.
- 8.3** Other Olympic host authorities will be considering the accommodation availability within their resorts and surrounding areas.
- 8.4** Fitness For Purpose is a programme launched in 2005 by the Department of Culture, Media and Sport (DCMS) that encouraged world class standards and excellence to visitors booking bed and breakfast accommodation within participating destinations. This programme applies a holistic and education approach involving hoteliers completing a self assessment checklist covering fire safety, health and safety, food hygiene and trading standards. The programme is targeted at failing hotels, guest houses and other similar accommodation that show poor standards. Some of the pilots used contract EHPs to provide the initial advice and support to the more risky businesses.

- 8.5** The programme is set up through working with the local community and hotel associations. Initial pilots reported and improvement in standards of 98%. Visitors' experience of their hotel accommodation is one of the key 'moments of truth' and creates a lasting impression of this country and can impact on the reputation of the UK as a leading tourist destination.

Developing a management programme

- 8.6** The management programme will need to take into consideration:
- Information and support to existing and new hospitality proprietors
 - Partnership work with tourism and hospitality industry (British Resorts Association/Visit Britain/DCMS)

Action planning summary

2010

Evidence and information setting. Developing draft guidance and business support programme for the hospitality sector through the London Food Co-ordinating Group

2011

Implementation of support programme. Training for businesses

2012

Implementation of focussed support and information programme.

9. Food/water related infectious disease surveillance/management

Rationale

- 9.1** The risk of transmission of infectious disease is potentially increased at mass gatherings. To address the potential for increased risk, it is important to have set up a comprehensive surveillance programme/systems in place. In previous Games the surveillance has incorporated notifiable disease as well as syndromic and injury surveillance. The main lead for public health lies with the NHS London.
- 9.2** Food borne and water borne diseases and travellers diarrhoea are recognised as key priorities in terms of public health.
- 9.3** During Games time it will be important to address public health issues with more urgency. The systems and capacity need to be in place to receive, rapidly analyse and react to surveillance, reporting and intelligence systems information as well as identifying and responding to any potential health protection threat. The influx of international visitors combined with daily mass gatherings in restricted spaces can increase the risk of spread of communicable diseases. Risks of contamination to water and food supplies can also increase due to greater demand. The threat of deliberate contamination is also heightened due to the high profile nature of the event. Early identification therefore will help reduce the risk of widespread exposure and minimise the impact on both visitors and the local community.
- 9.4** The lead for public health in England lies with the HPA whose role is to provide an integrated approach to protecting UK public health through the provision of support and advice to the NHS, local authorities, emergency services, other arms length bodies, the Department of Health and the devolved administrations (National Public Health Service, Wales; Health Protection

Scotland (HPS); Department of Health; Social Services and Public Safety, Northern Ireland).

- 9.5** The functions of the HPA are “to protect the community (or any part of the community) against infectious diseases and other dangers to health” (HPA Act 2004); this includes chemical and radiation hazards.
- 9.6** Infection control within ports will be a critical consideration. London port health will be expecting to get daily maritime declarations of health from all vessels mooring on the Thames and at Tilbury. These vessels will be frequently inspected for infectious disease control. Containment of any unwell passengers would likely involve containment on the vessel (depending on sickness).

Developing a management strategy

- 9.7** Current HPA surveillance, reporting and intelligence systems are well established and effective, however they are being enhanced to provide additional information and facilitate real-time reporting during the Games period. Data will include clinical notifications, laboratory reporting of infectious disease, monitoring of environmental and chemical hazards as well as data collection from Olympic venue medical facilities.
- 9.8** In addition to the current systems an Emergency Department Syndromic Surveillance System (EDSS) has been developed for the Olympics which will capture data on emergency care undertaken in hospital emergency departments. It is also hoped to modify this to provide syndromic surveillance information from walk-in centres and out-of-hours services for the duration of the Olympic Games period.

Food/water related infectious disease surveillance/management

- 9.9** Under existing arrangements, Health Protection Units (HPUs) will work closely with the FSA if a food borne disease outbreak occurs. The FSA will respond in accordance with their agreed procedures (see reference below).
- 9.10** The new public health legislation that came into force on 6 April 2010 supports this work in reinforcing the legal duty on Registered Medical Practitioners (RMPs) to notify an expanded list of specified diseases / conditions to the Proper Officer of the Local Authority (responsibilities are often assigned to a Consultant in Communicable Disease Control (CCDC) in the HPA). The second phase of the legislation makes diagnostic laboratory reporting of a list of specified organisms to the HPA mandatory from 1 October of this year.
- 9.11** Furthermore additional fields will be added to data collection forms/systems, such as the Notification of Infectious Disease Surveillance (NOIDS) form, so links to Olympic events such as attendance at a venue or major live site can be identified.
- 9.12** The surveillance, reporting and intelligence data will be used to produce an HPA daily public health report (SitRep) for the Games Chief Medical Officer and other key stakeholders in the run up to and during the Games. This SitRep will include information on public health threats, incidents and trends in disease incidence across the UK and any significant international event that may pose a threat – and will provide assurance that the appropriate public health response is being undertaken.
- 9.13** Within the HPA, local HPUs investigate and manage outbreaks of communicable disease, provide surveillance of communicable diseases and infections and support local authorities (as well as port health authorities) in their responsibilities under the Public Health (Control of Disease) Act 1984 and associated regulations. Local HPUs are staffed by CCDCs, nurses and other staff with specialist health protection skills. The HPA also provides laboratory support by managing or commissioning regional public health microbiology services (including food, water and environmental microbiology), together with Collaborating Consultant Microbiologists, who are based in NHS laboratories but have a special interest in health protection. The HPA also undertakes specialist and secondary testing to provide support for outbreak management.
- 9.14** The joint London Environmental Health Professional post is funded by the Health Protection Agency in London and ALEHM, and managed by the London Regional Policy Officer at the CIEH. Year one of the project involved looking at the barriers to good communication between environmental health departments and HPUs in London as well as identifying issues surrounding the notification system.
- 9.15** A full report of this work is now available and can be downloaded from the CIEH website. The recommendations include:
- Agreed communication frameworks between environmental departments and the four HPUs for both in and out of hours services
 - Production of a joint, pan-London memorandum of understanding on infectious disease notification and investigation, and a related toolkit
 - Increased HPU/EH forums and training opportunities
 - Increased awareness of the work and services provided by the HPA's London CoSurv development team

Food/water related infectious disease surveillance/management

- Clarification and agreement regarding notification pathways

Action plan summary

2010

Review and systems enhancement.

2011

Testing, exercising and baseline data collection.

2012

Provision of SitRep, public health expertise and information.

Further information

- Guidance on the management of outbreaks of food borne disease can be found at www.food.gov.uk/foodindustry/guidancenotes/hygguid/outbreakmanagement
- FSA Incident Response protocol : www.food.gov.uk/foodindustry/incidents/respond/
- Joint London environmental health professional post: http://www.cieh.org/members/london_joint_environmental_health.html

10. Healthy eating and health and wellbeing

Rationale

- 10.1** Healthy living is one of the key themes of the sustainability policy that underpins the Games in 2012. The London 2012 Games also offer the chance to tackle inequalities especially those around the Olympic venues in east London who currently have a life expectancy of seven years shorter than people living in the centre of London.
- 10.2** The event offers the huge opportunities to inspire and promote healthy living including health eating.
- 10.3** Increasing physical activity will obviously be a central theme of any promotional activity linked to the Olympics but this links closely with the reducing obesity programme.
- 10.4** The food vision lists choice and balance as a key theme and aims to help promote understanding of what constitutes a balanced diet. LOCOG will be seeking to ensure:
- Lower salt, fat and sugar options are available
 - Increase visibility and variety of fruit and vegetables
 - Increased use of grilling and steaming as cooking methods
 - Use whole grains
 - Increase proportion of menu items without meat or fish content
 - Optimise portion size
- 10.5** “Small steps for life” was launched in October 2009 and aims to motivate and support young people (5 – 16 years) to take small achievable everyday steps to eat well, get active and feel good. This is part

of the healthy and active lifestyle strand of the “Get Set- London 2012” education programme. London NHS has also produced a similar strategy Go London! An Active and Healthy London for 2012 and beyond (2009) which also advocates a improvement in physical activity and healthier lifestyles as a contribution to the London 2012 public health legacy.

Developing a management strategy

- 10.6** The existing strategies that are being developed under the Department of Health London 2012 Public Health Work stream, the City Operations and GLA functions and activity supported through campaigns led by the FSA all significantly contribute to the promotion of healthier life choices around food.
- 10.7** The food safety and standards strategy will need to keep these programmes in view to ensure that any opportunity for supporting messages and linking approaches can be maximised

Action plan summary

2010

Disseminate completed strategy to inform and identify potential links to existing strategies.

2011

Contribute to developing health promotion strategies and identify opportunities for implementation

2012

Implementation and review of health promoting strategies

11. Food incidents, emergencies, resilience and crisis planning

Rationale

11.1 In addition to food borne infectious disease outbreaks, a number of other types food incidents can occur, which fall broadly into two categories. These are incidents involving contamination of food or animal feed in processing, distribution, retail and catering chains or environmental pollution incidents such as fires, chemical or oil spills. In all cases the FSA is responsible for protecting consumers from risks associated with food. Where there is an environmental emergency or incident with wider implications the FSA will work with the resilience community, following agreed response procedures.

Developing a management strategy

11.2 For food incidents FSA follows procedures as set out in the Incident Response Protocol. For an environmental emergency or an incident with wider implications, or that originates in a different sector, a multi-agency response will take place, following established response procedures as set out by the Cabinet Office. If the scale and complexity of an incident is such that some degree of government co-ordination and support is necessary, a designated 'lead' government department will be responsible for the overall management of the response. In the case of a widespread accidental or deliberate contamination of food or feed incident, the FSA will take on this role.

11.3 Strategy for this to ensure all key partners familiar with arrangements and competent at responding in line with these.

Action plan summary

2010

Awareness raising

2011

Awareness raising and exercising.

2012

Awareness raising and exercising.

Further information

- FSA Incident Response protocol : www.food.gov.uk/foodindustry/incidents/respond/
- Cabinet Office resilience website: <http://www.cabinetoffice.gov.uk/ukresilience.asp>

12. Sustainability (environmental factors, diversity, food sourcing and waste)

Rationale

- 12.1** London 2012 has stated its ambition to set new standards for staging a sustainable event. LOCOG is committed to demonstrating leadership in sustainable development and ensuring that the Games are managed in a way that is environmentally sound, economically viable, and socially responsible. “Safe and sustainable” food is part of that ambition. London 2012 is the first host city to make a bid commitment linking sustainability and food.
- 12.2** LOCOG’s food vision sets out their approach to the provision of catering services demonstrating enhanced sustainability standards and contributing to the overarching aim of staging Olympic and Paralympic Games that set a new benchmark for the sustainability of major events and leaves a positive legacy for the host boroughs, London and the UK.
- 12.3** Food has recently been the subject of increasing attention from the public, in the press and in Government against the backdrop of an increasing concern about climate change, waste, resource use, socio-economic factors and long term food security in a changing world. LOCOG fully recognises these factors and is determined to ensure that the food and catering operation for London 2012 establishes a clear position that is based on the practical requirements of delivering a delivering a food service operation of this scale, whilst reflecting enhanced sustainability. The LOCOG food vision has two of its key themes as food sourcing and supply and Environmental management. In this strategy, LOCOG seeks to ensure that food and beverage products are sourced with regard to high benchmark and aspirational environmental and ethical and animal welfare standards. They also seek to ensure the Games maximises energy and water efficiency of catering equipment, zero waste to landfill during Games time, 70% waste reused or recycled and to minimise carbon emissions.
- 12.4** The impact and activity of LOCOG and ODA performance on sustainability is closely monitored by the Commission for a Sustainable London 2012. The Commission has produced a thematic review of food sustainability across the London 2012 programme.

Developing a management strategy

- 12.5** LOCOG food vision and other supporting strategies provide a comprehensive framework with the potential to raise the sustainability of the food services industry and large scale event catering. The CIEH also considers sustainability to be a key priority for environmental health and will developing a programme of professional support initiatives to drive the agenda forward. This will tie into and underpin planning and preparations for Olympics/Paralympics in 2012 and beyond.
- 12.6** Local authorities and other stakeholders can identify and maximise opportunities to promote food sustainability within their existing food safety, standards and environmental agendas.

Action plan summary

2010

Acknowledge existing LOCOG strategy framework and link sustainable food policy to food safety agenda. Raise profile of food sustainability to key stakeholders

2011

Continue promotion and advocacy.

2012

Continue promotion and advocacy

Further information

- Food Vision – LOCOG link: <http://www.london2012.com/documents/locog-publications/food-vision.pdf>
- On Your Marks, get set, grow – Commission for a sustainable London 2012, April 2010 www.cslondon.org
- Sustainable events – LOCOG www.london2012.com

13. Capacity and capability building

13. Capacity and capability building

Rationale

- 13.1** The challenge that London 2012 offers is in addition to the day to day operation of food safety services. Although local authorities who are the main delivery agencies for food service enforcement will strive to ensure “business as usual” for existing communities leading up to and during Games time, there will undoubtedly be significant social responsibility for ensuring that food businesses are able to cope safely with the increased demand from higher levels of visitor foot fall.
- 13.2** The intensity of audits, advice and business support and enforcement will increase closer to and during Games time. This intense period of staffing which is within normal annual leave peak period (school summer break) will add to the staffing and resource pressures within local authorities.
- 13.3** The recent LAEMs report (March 2010) based on local authority submissions identifies that there are 2,861 FTE professional staff within the UK food law enforcement service. The data show a national 8% vacancy rate. The large majority of these staff 1957 (68%) work on food hygiene. However, the data also shows that across the country there is a significant variation in staffing levels from 1FTE:200 food establishments to 1FTE:1,500 food establishments.
- 13.4** Service delivery planning will need to anticipate capacity and standards of delivery in a challenging climate of continual reductions in staffing and resource restrictions. Alternative staffing strategies need to be considered:
- Back filling for existing officers engaged in additional work loads
 - Sharing services
 - Mutual aid arrangements
 - Using volunteers (currently the CIEH has a list

of potential professional volunteers currently around 100 officers)

- 13.5** The economic climate is creating a fast changing landscape and many local authorities are currently moving ahead with initiatives and amalgamations of services. These may significantly impact on service delivery and will need to be closely reviewed in light of expectations and resourcing any implementation plan for London 2012.

Developing a management strategy

- 13.6** By 2012 the capacity and capability of local authority regulatory staff is likely to be significantly reduced. With the main drivers for change being economic, it will be challenging to secure any assurance of resourcing plans and services. The Olympic administration along with other relevant organisations will be working with host local authorities to facilitate developing a more robust mechanism of managing restricted resources more effectively during Games time. This additional impact has already been captured in many of the host local authorities. The JLARS will also be addressing staffing needs and working with LOCOG to ensure that the Olympic Park and other venues are adequately resourced leading up to and during Games time. This is likely to involve the development of the environmental health volunteer programme currently managed through the CIEH.
- 13.7** Professional competence is at the heart of supporting a successful Games. When there may be variable levels of service resourcing across the country the professional competence will be a thread that runs through environmental health services throughout the UK. This level of consistency, sharing of learning and experience and building on expertise is part of the legacy that the Olympics/Paralympics offers to the profession.

Capacity and capability building

- 13.8** The professional competency will be led by both the CIEH and the FSA through specific training and development initiatives and through the robust networking of liaison groups and professional networks.
- 13.9** The capability building also extends to other stakeholders who through partnership and joint planning and projects will learn more about how each of the different agencies and organisations contribute to improving environmental and public health.
- 13.10** Most importantly the capability and resilience of the professional resource will also help support similar training and support initiatives throughout the food industry. A range of educational opportunities and providers will establish a foundation of training and development for food businesses from the Safer Food Better Business to the higher levels of certificated course and training.
- 13.11** Food safety education will be a key part of the contract management process for the competition and other LOCOG venues. However, these standards through the promotion of the LOCOG Food Charter can be used to encourage the establishment of food safety management competence within UK food businesses.

Action plan summary

2010

Set up Project team to review shared resources and develop initial report for wide circulation to decision makers and budget holders

2011

Review resource impacts and revise any strategies and plans. Review volunteer programme and support for LOCOG/JLARS

2012

Review resource impacts and revise any strategies and plans. Train and implement volunteer workforce as necessary

Further information

- JLARS CIEH Volunteer programme – http://www.cieh.org/policy/2012_london_olympics_eh_activities.html
- FSA Enforcement Statistics 2008/09: <http://www.food.gov.uk/multimedia/pdfs/board/fsa100309v3.pdf>

Annex 1 and 2

Annex 1: Purpose and composition of the Food Strategy Management Group

The aim of the group is to bring stakeholders together to discuss and plan a national food strategy as part of the planning and preparations for the Games in 2012. The group will look at providing professional and good practice guidance to help inform and provide consistency to host boroughs and other local authority enforcement and implementation regimes. The work of this group is independent of the specific planning for food safety and standards enforcement within the host boroughs being led by the JLARS. It has a wider brief looking at broader policies and principles of practice that will provide a focus for consistency, transparency and proportionality outside of the Olympic venues and around key tourist areas.

Stakeholders:

- London Food Co-ordinating Group
- CIEH
- TSI/LOTSAs
- FSA
- LGR
- Food safety/ trading standards specialists
- Host authorities
- Industry

Annex 2: Food Challenges in London

London remains the focus for much attention as it hosts the main competition arenas and the Olympic Park. It is also likely to be the main focus for the Games visitors.

Viewing London from a food safety management perspective the Capital offers both unique opportunities for food businesses and poses specific challenges. As a world class city with a population of 7.4 million, it welcomes being a world centre for tourism. There is an estimated 77,000 food businesses in London of which 60% are estimated to be restaurants or catering establishments. There is also increasing growth in the hotel and restaurant sector which will no doubt further accelerate as we move closer to the Olympic and Paralympics events in 2012. Alongside this, London currently experiences a higher reported incidence of food poisoning, especially Salmonella, than other regions, although the reasons for this are not known (London Health Observatory). A recent estimation of the economic cost of food poisoning was £0.9 billion (£2.6million a day). In terms of cases this equates to 1,467 notified cases of food poisoning a day, 33 of which required hospitalisation. Averaging across the year there was almost one death per day associated with food poisoning. In 2007, 42% of UK food poisoning cases non-residential caterers (21%) and retail (7%) sectors were the major sources of outbreaks.

London has the “best of the best” with 31 Michelin starred restaurants but also has an estimated 7.4% high risk food premises (FSA 2006). London celebrates its cultural diversity and is at the leading edge of economic and strategic development. Over 30% of London’s population belong to ethnic minority groups and almost one in four businesses (22.6%) are owned by ethnic minorities. London also encompasses some of the poorest areas in the country - three of the most deprived councils in England are in London (London Councils 2006). Literacy and numeracy are also major problems in London with some 20% of Londoners having low literacy levels and some 48% having low numeracy levels (London Councils 2006).



Printed on Evolve Business, which is a 100% recycled paper certified by the Forest Stewardship Council (FSC).
This document is also fully recyclable.



Chartered
Institute of
Environmental
Health

Chartered Institute of Environmental Health
Chadwick Court, 15 Hatfields, London SE1 8DJ

Telephone 020 7928 6006

Email info@cieh.org **Web** www.cieh.org

Registered charity no. 290350

© CIEH, 2011