

# Local Authority Capacity and Capability: Chapter 1 Introduction and Methodology

## Background

### The role of the FSA

The FSA's role, set out in the Food Standards Act 1999, is to protect public health from risks arising in connection with the consumption of food and to protect the interests of consumers in relation to food and feed. While food businesses are responsible for making sure the food they produce and supply is safe and is what it says it is, much of the FSA's work is aimed at supporting the system as a whole. The FSA is one of three key lines of defence in the food system in England, Wales and Northern Ireland:

1. Food businesses have primary responsibility for keeping the public protected. Businesses must have the right knowledge and controls in place to ensure the food they produce, sell and import is safe and authentic.
2. Local Authorities (LAs) across England, Wales and Northern Ireland are responsible for enforcing food safety and food standards. They must determine how risky businesses are and therefore how frequently they should inspect them.
3. The FSA provides a backstop for these protections, acting as the national regulator for food. This happens through monitoring and auditing LA performance.

The Food Standards Agency therefore has a key role as the Central Competent Authority in overseeing official food and feed controls undertaken by LAs. It also seeks to work in partnership with local authorities to help them to deliver official food and feed controls. The Agency is therefore proactive in setting and monitoring standards, and in auditing local authorities' delivery of official controls, in order to ensure that this activity is effective, risk based, proportionate and consistent.?

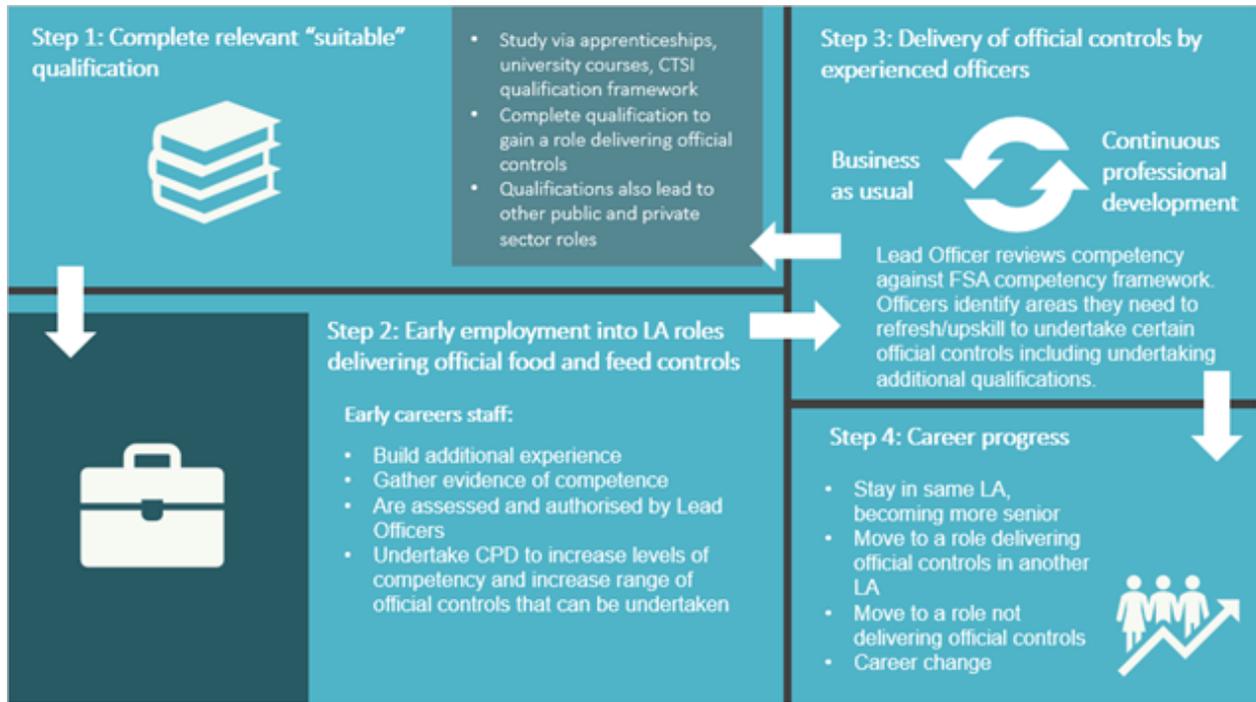
The current models in England, Wales and Northern Ireland for providing assurance that food and feed businesses are meeting their legal obligations are underpinned by LA Environmental Health (EH) or Trading Standards (TS) regulatory teams undertaking official food and feed controls and related activities.

### Environmental health and Trading standards professionals

LAs must have 'a sufficient number of suitably/appropriately qualified and experienced officers to undertake risk-based controls in their area', as required by the Retained EU Regulations 2017/625 (England and Wales) and Regulation (EU) 2017/625 (Northern Ireland). People performing official food and feed controls and other official activities must be duly authorised. Competent Authorities must have a procedure(s) to ensure that authorised officers engaged in official food and feed controls and other official activities hold a suitable/ appropriate qualification (or equivalent) and they are competent and experienced in accordance with the FLCoP/FeLCoP and associated Practice Guidance, where relevant to their level of authorisation and the range of duties performed.

A summary of responsibilities for official food and feed controls across different LA types and by nation is included in Annex D.

There are a number of steps to become authorised to deliver official food and feed controls (see Figure 1), with requirements set out in statutory Food Law and Feed Law Codes of Practice and Practice Guidance in England. Separate, but parallel, Food Codes apply in Northern Ireland and Wales.?



To be authorised to deliver official food controls, individuals are required to hold a 'suitable qualification' (unless only undertaking the activities listed in section 3.3.2 of the relevant FLCoP) and be able to demonstrate the competencies for the activities they are undertaking. The FSA Competency Framework sets a consistent standard and describes the competencies (knowledge and skills) required to carry out official food and feed controls. It has been implemented for food controls delivered by Local/Port Health Authorities. For feed controls, competency is currently assessed against the competencies in the FeLCoP and practice guidance. CIEH and CTSI also have their own professional standards/competency frameworks which set out the necessary requirements and skills for job roles. These are broader than food and feed competencies and

cover the whole of the professions.

Authorising an individual to deliver official food and feed controls requires LA Lead Officers to make a professional judgement about their staff. They must consider the qualifications their staff members hold and their level of experience (for example, time in post, exposure to certain tasks, evidence from logbooks) with reference to the FSA Competency Framework/FeLCoP and practice guidance before authorising them to undertake official controls. If the competency assessment considers that further knowledge or skills are required prior to authorisation they may recommend further training/CPD. This means people working to complete suitable or appropriate qualifications for food and feed (Step 1) may already be employed by LAs.

Evidence suggests that LAs are experiencing significant issues around the recruitment and retention of suitably / appropriately qualified and competent staff to undertake official controls and related activities. Intelligence obtained in November 2020 from national groups representing LAs undertaking food hygiene and food standards official controls in England, Wales and Northern Ireland, suggested that over 50% of LAs had challenges recruiting suitably/appropriately qualified staff. Use of contractor staff has also increased.

A Chartered Institute of Environmental Health (CIEH) workforce survey published in 2021 found that 56% of local authorities in England had vacancies in their Environmental Health (EH) teams that were left unfilled for six months. It was estimated that there were approximately 375 Full Time Equivalent (FTE) posts left unfilled in 2019/20 for six months or more across England – around 1.2 FTEs per LA. The Chartered Trading Standards Institute (CTSI) workforce survey report 2018-19 found that just over half of the LAs in the UK did not believe they had sufficient expertise to cover the full range of Trading Standards (TS) responsibilities, and that the ageing trading standards workforce was a threat to future professional capacity. The findings from some of the workforce surveys and other relevant literature can be found in the links provided in Annex B.

The FSA commissioned Ipsos UK to carry out research to understand more about the barriers and facilitators to recruiting and retaining suitably/appropriately qualified staff to deliver official food and feed controls in LAs in England, Wales and Northern Ireland. This covers official controls carried out by both EH and TS professionals in LAs.

The research aimed to engage key stakeholders for their views. This included frontline LA staff delivering official food and feed controls; those managing relevant LA teams; those who have recently left relevant LA roles; education providers; students on relevant courses; and professional bodies.

The need to engage such a broad range of stakeholders reflects the complexity of the pipeline to produce a suitably and appropriately qualified and competent officer (see Figure 1). The research also aimed to review the findings from this stakeholder engagement against previous research undertaken for specific parts of the workforce or at a point in time prior to the pandemic to understand where these corroborated or contradicted findings.

## Methodology

The table below summarises how we explored each stage of recruitment and retention with different stakeholder audiences. A full list of the research questions for each stakeholder group was included in the research materials.

Aspects of recruitment and retention

Most relevant stakeholder groups (although coverage across all)

Part 1: Attracting people to relevant education pathways	Current students (including apprentices) Education institutions providing these courses Professional and leadership bodies
Part 2: Attracting people on relevant education pathways to careers specialising in food and feed within LAs	Current students (including apprentices) Education institutions providing these courses Professional and leadership bodies LA managers Current and former EH and TS professionals specialising in food and feed
Part 3: Retaining suitably/appropriately qualified and experienced staff within LAs	LA managers Current and former EH and TS professionals specialising in food and feed Professional and leadership bodies

A combination of online focus groups and in-depth interviews were conducted with key stakeholder groups. Online in-depth interviews were chosen as the most appropriate data collection method for LA officers, former employees, education providers and professional body and sector representatives. This approach provided a confidential space for individuals to discuss their views and experiences. Focus groups were chosen as the most appropriate data collection method for students and LA managers as this provided an opportunity for an open discussion with peers about perceived barriers and opportunities.

This report is based on qualitative findings and captures perceptions among key stakeholder groups. The findings demonstrate that some stakeholders were unsure about specific aspects of the education pathways and professional requirements for LA staff carrying out official food and feed controls. It was also not always possible to verify the details of individual circumstances and experiences, but we have drawn out examples of barriers and opportunities around recruitment and retention throughout the report. Stakeholders sometimes struggled to navigate the complexities of EH and TS professions overall, including some misconceptions about how the current system works. This confusion is a finding in itself since the challenges of navigating the professional pathways are likely to be even greater for those with no existing knowledge of EH, TS or official controls.

When interpreting the findings, it is important to note that these provide insights about stakeholders' perceptions of the current recruitment and retention barriers and opportunities. The research has focused on perceptions because these are valuable for understanding challenges around recruitment and retention and how these might be addressed. However, the complexity of the topic and range of stakeholders included means individual participants may not always have had a comprehensive understanding of the system-wide issues they raised. Participants themselves often said they were uncertain about specific points. This is described in more detail throughout this report.

## Sampling

A purposive sampling design was used to capture the diversity of experiences and perceptions among stakeholders in England, Wales and Northern Ireland. The recruitment strategy differed across stakeholder groups depending on the information available and existing relationships. Due to previous research undertaken by the Directors of Public Protection Wales (DPPW), in relation to the public protection service as a whole, Welsh LA managers declined the invitation to take part in the qualitative research and therefore findings about Wales are not directly informed by their experiences. The report by DPPW was, however, considered as part of the Rapid Evidence Assessment.

The achieved sample across stakeholder groups was as follows:

- LA managers: Overall, 38 LA managers from different types of LAs across England and 4 LA managers from Northern Ireland took part. 35 LA managers from England participated in two focus groups further divided into smaller breakout groups. An additional 3 LA managers from England took part through online in-depth interviews (as they expressed interest in taking part after the focus groups). The 4 LA managers from Northern Ireland took part in a single focus group.
- LA officers: Overall, 24 current LA officers from England took part, 3 LA officers from Wales, and 2 from Northern Ireland. Online in-depth interviews were conducted with all LA officers.
- Former LA employees: 10 former employees took part through online in-depth interviews. These were people with experience of delivering official controls in LAs in the last five years who were now working in other public and private sector roles.
- Education providers: 11 representatives from education providers took part through online in-depth interviews. 10 based in England and 1 based in Wales. 10 were from universities and 1 was an apprenticeship training provider (RCO level 4).
- Professional membership and leadership bodies: 7 individuals from 4 professional membership and sector leadership organisations took part, through in-depth interviews. Professional membership bodies engaged in this research were the Chartered Institute of Environmental Health (CIEH), the Chartered Trading Standards Institute (CTSI), and the Institute of Food Science and Technology (IFST). The Association of Chief Trading Standards Officers (ACTSO) also took part as sector leaders. The LGA participated by providing overall context about LAs to inform the research.
- Students: Overall, 31 students from England, 4 from Wales and 1 from Northern Ireland took part in the research. Students were divided into four workshops, which were then further split into smaller groups to enable all participants to contribute. Apprenticeship students were also included.

A more detailed breakdown of the sample is available in Annex A.

This project was designed to capture insights from across stakeholder groups during the fieldwork period. Purposive sampling and the use of multi-method recruitment approaches (including snowballing of contacts) facilitated the project's delivery but comes with the risk of participant self-selection. Those with more time/availability may be more able to take part. This risk was mitigated by lengthening fieldwork timeframes and being flexible with participation requirements (for example, conducting shorter interviews, providing alternative interview times when participants could not attend focus groups, or receiving some information in written form where participants were unable to commit to an interview).

Within the scope of the project, it was not possible to include all potential stakeholder groups, in part because of challenges recruiting sufficient numbers within the time available and accessing potential participants. This included people who had left education pathways prior to obtaining relevant qualifications and EH and TS professionals with relevant qualifications but with no experience of delivering or managing food or feed official controls. In addition, only a small number of participants who had moved from LA roles to the private sector took part.

Further research would be useful to capture different perspectives on recruitment and retention issues. As such, this research should be viewed as a starting point that has captured views among the key stakeholder groups included.

## **Recruitment and administration**

Recruitment of participants varied across stakeholder groups. Recruitment of LA managers, LA officers and former LA employees was supported by the FSA requesting participation through

their Smarter Communications platform. With education providers and professional body contacts' consent, the FSA shared contact details with Ipsos, who contacted individuals directly inviting them to participate. Students were recruited by education providers already participating in the research and were informed that the research had been commissioned by the FSA.

Fieldwork took place between 26th January – 16th March 2023, with lead-in time throughout January. Ipsos drew on a team of qualitative researchers to undertake qualitative data collection within this timescale.

## **Incentives**

Incentives were only offered to students. Students were given a £50 thank-you payment for their participation.

## **Ethics**

All participants were provided with information about the purpose of the research, the commissioning client, how their data would be used, their rights to withhold or withdraw information, and details of confidentiality in reporting. All participants were asked for their consent to participate in the research and their consent to audio record conversions.

## **Data analysis**

Recordings and transcripts were analysed using qualitative thematic analysis, allowing the research team to identify key findings from across interviews and focus groups. Data was analysed across stakeholder groups to ensure that the reporting reflects both different perspectives and where views were consistent.

## **Quality assurance**

All outputs have been internally quality assured within Ipsos and have been quality assured and signed off by the FSA.

## **Rapid evidence assessment**

A Rapid Evidence Assessment (REA) was used to synthesise evidence relating to barriers and challenges LAs face when recruiting and retaining EH and TS professionals. Limited relevant evidence was found through the REA. Articles used for the REA are noted in Annex B.

This REA was completed on Google Scholar using a search protocol. This protocol included a number of relevant search terms, for example, 'Trading Standards Officer AND food OR feed' and 'Enforcement Officer'. With this protocol, a range of inclusion and exclusion criteria were used to narrow down the articles found. The primary exclusion criterium was date of publication. Only articles after 2010 were included as it was decided that any articles, apart from notable exceptions, would be too outdated to contain relevant information concerning current challenges LAs are facing..

## **Mapping of education pathways, career guidance and job opportunities to understand how these are presented to prospective students and professionals.**

Desk-based research was conducted to explore the training and career pathways for EH and TS professionals. This involved reviewing online information about training courses, career guidance websites and job advertisements. The job advertisements included related to vacancies advertised at the time of the research. These findings were mapped to provide a useful snapshot

of how these jobs are advertised, the wages that are offered and the skills and qualifications required.