

# Local Authority Capacity and Capability: Chapter 5 Perceived challenges with the FSA Competency Framework

As described in Chapter 1, the FSA Competency Framework sets a consistent standard and describes the competencies (knowledge and skills) required to carry out official food and feed controls. LA Lead Officers must consider the qualifications their staff members hold when making a judgement about their proficiency to deliver official controls, which means they must be able to understand the current education pathways and what qualifications enable individuals to deliver certain official controls. In the event an officer does not meet the competency requirements, LA Lead Officers may recommend further training or CPD.

## Qualifications and the Competency Framework

As mentioned in Chapters 2 and 3, there was a general perception across stakeholder groups that the current education pathways can be complex to navigate. Among LA managers, the lack of clarity around how the range of different qualifications in EH and TS relate to the competency requirements prevented them from confidently authorising officer to deliver official controls in LA S.

**“It's about our confidence to authorise officers to be able to undertake official controls. That's, sort of, the crux of it, because we have to authorise them, but it's not very clear what the goal posts are.” (LA manager, EH, England)**

The lack of clarity around qualifications and how these relate to the Competency Framework was also perceived as a recruitment barrier. For instance, LA managers said that this complexity had a direct impact on their ability to attract and recruit new staff. They were concerned about whether they could be confident that job applicants – and indeed current staff – had suitable qualifications and could demonstrate required competency.

Likewise, LA officers said that it was sometimes difficult for them to understand what their qualifications allowed them to do and what roles they could apply for. This confusion was seen as frustrating and unnecessary, and thought to put off early careers staff from continuing their EH and TS professional development in LA roles. In addition, officers working in Port Health expressed particular concerns around this.

**“I worked with some very highly qualified people, nobody's really sure what it is I'm actually authorised to do and what it is that I'm not authorised to do.” (LA officer, EH Port Health, England)**

**“The CIEH have changed the process of becoming an EHO many times, I don't know if anybody else knows who is an EHO and who isn't and whether it's a portfolio or what it is because the pass rate has changed so many times.” (LA manager, EHO, England)**

Furthermore, LA managers also cited some challenges they are currently facing regarding the flexibilities introduced in the FSA Competency Framework. Although the flexibilities were welcomed in principle, LAs said they can find it challenging to work out who can deliver official controls in practice.

Thinking about recruitment specifically, managers said that the flexibilities were ambiguous and that the framework does not provide enough guidance on what requirements are needed, for example including how qualifications relate to registration with professional bodies. As such, the main barrier is the clarity with which current qualifications, including registration with professional bodies, relate to the Competency Framework. LAs may have to get clarification from professional bodies or the FSA when recruiting new staff, and this is not always straightforward.

**“If a Food Safety Officer has got the Higher Certificate in Food Control or someone's got the MSc in EH or someone's got the EH degree, that as long as they're assessed in terms of the Competency Framework that's issued by the FSA, then they can be authorised to do official controls. So, it appears that they don't have to be registered with the CIEH but it's still, you know, quite confusing.” (LA manager, EH, England)**

**“Flexibility basically involves people wading through pages and pages of competencies and working out whether or not someone is suitable.” (LA manager, TS, England)**

This lack of clarity was seen as a particular issue because of the importance of ensuring professional standards were being met, and only those who should be delivering official controls were doing so. LA managers were concerned there would be consequences if they made the wrong decision about whether someone was competent based on the framework, while not always feeling equipped to make the judgment.

Particularly, in Northern Ireland there was a general consensus among LA managers that food and feed roles (when compared to other roles within EH, such as housing) required significant administrative input. These managers mentioned that the time required to assess competencies and prepare for regular audits conducted by FSA was high. This meant they considered the Competency Framework burdensome and unnecessarily complex. It was perceived that audits put administrative pressure on both managers and officers. For example, LA managers mentioned that there is substantial paperwork that requires too much detail and audits were thought to happen too frequently. This was seen as something introduced to solve problems in England and Wales, but that had a negative impact on the different context in Northern Ireland.

## **Competency requirements and CPD opportunities**

As previously mentioned, LA Lead Officers may recommend further training or CPD if an officer does not meet the competency requirements to deliver official controls in LAs as set in the Competency Framework. While CPD is welcomed in principle, participants raised concerns about the opportunities available to them and the relevance and usefulness of training on offer.

Although some had more positive experiences, in general participants felt that there was not much variety or quality. They highlighted how many of the training opportunities available were simply refresher courses to recap on existing knowledge. Participants reported finding themselves repeating the same courses simply to meet the minimum hours required.

**“I think the idea of that ongoing competency is really good, rather than qualifying once 20 odd years ago and then you never do anything again... but we are searching about for new courses or different courses, and it actually becomes a waste of money to send people on the same course to effectively just tick a box that says they've had their CPD hours.” (Professional or leadership body)**

**“We're just doing the course for the CPD hours, rather than doing the course because it would be meaningful, worthwhile, useful, to our role.” (LA officer, TS, England)**

This lack of quality and variety meant that LA managers and LA officers felt that current CPD opportunities failed to deepen their understanding of their roles or provide them with fresh insight.

There was a desire to see a wider range and more career progression courses, which participants also felt would be beneficial to their career development. In addition, although participants valued the emergence of online courses, saving time and financial costs, there was a desire to see more of a balance with face-to-face opportunities.

As with career progression more generally, there was a perception that larger and more urban authorities have better opportunities and connections to organisations that offer training than smaller and rural LAs.

**“I've always worked in quite large authorities, actually, we weren't too bad on training. We always had a bit of a budget, [...] But I think that's different in smaller authorities, so smaller budgets but also, we used to do quite a lot of in-house stuff. Quite a lot of in-house training and smaller authorities just haven't got that ability to do that.” (Former LA employee, TS, England)**