

# Food crime - guidance for businesses

Guidance for businesses on how to spot and prevent food crime.

## What food crime is

The UK benefits from some of the safest and most authentic food and drink in the world. Despite this, there may be a small minority of individuals who seek to benefit from fraudulent behaviour. Food crime involves dishonesty at any stage in the production or supply of food, drink, or animal feed.

Food crime can be defined as serious fraud and related criminality in food supply chains. These activities are often referred to as food fraud. It can be seriously harmful to consumers, food businesses and the wider food industry. Food crime can occur in various ways and can range from isolated acts of dishonesty by individual offenders, to organised illegal activity coordinated by criminal networks.

The [National Food Crime Unit](#) (NFCU) has identified seven different types of criminal behaviour often seen in food crime: adulteration, substitution, theft, misrepresentation, illegal processing, waste diversion and document fraud.

## Examples of food crime

**Theft** – Examples may include the theft of livestock or goods in transit. Although theft is a matter for the police, the National Food Crime Unit do hold an interest in how stolen food products enter the food supply chain.

**Unlawful processing** – Examples of unlawful processing may include the slaughter of stolen livestock in a warehouse or private residence. The slaughter of animals and processing of products of animal origin must be carried out at an approved premises, in an approved manner and by an individual with the correct license. This is to ensure that animal welfare and food safety standards are met and that there is a full record of traceability.

**Waste diversion** – Food products that have been, for whatever reason, marked for disposal then entering the legitimate food chain. This may include the diversion of animal by products into the supply chain or consignments of food that have been rejected and deemed unfit for human consumption entering the supply chain.

**Adulteration** – Examples may include adding water to fruit juice or peanut powder to almond powder without informing customers. Forms of adulteration may also include the addition of non-food items to ingredients.

**Substitution** – Examples may include replacing lamb with goat or authentic vanilla with synthetic vanillin.

**Misrepresentation** – Examples may include saying that something is organic, free range, Halal, Kosher or produced in the UK when it is imported from overseas.

**Document fraud** – Examples may include a document which falsely states the movement of livestock, traceability of a food product, forged import documents or a fake certificate attempting to prove any claims such as organic certification.

## **Food crime and smaller food businesses**

Food crime can affect any food business regardless of size or sector. It is not a victimless crime, and it can impact your brand's reputation and pose a risk to your customers. Food crime can not only lead to a person or business suffering a financial loss through intentional acts of dishonesty from an individual or an organised criminal network but can also impact food safety.

For instance, non-allergenic ingredients could be replaced with allergenic ingredients and if not declared could have potentially devastating consequences. Food that is not fit for human consumption, such as animal by-products, could be diverted back into the supply chain. These activities pose a potential risk to your customers and to your business.

You should be able to provide your valued customers with food that is safe and what it says it is. To do this you need to ensure you're aware of food fraud and take steps to mitigate against it.

## **How to spot the signs**

There are things that you need to look out for which could be an indication of food crime. It is important that all those working in a food business are made aware of these potential signs of food crime, and how to report any concerns.

- Increase in customer complaints such as a decline in the quality of products or a change in the taste.
- Products or ingredients you have purchased from suppliers do not match their description.
- Suppliers are not able to provide a traceability record for products.
- Testing that you have carried out indicates that there is an issue around the authenticity, origin, or quality of products that you have received.
- Inaccuracies in paperwork you have received regarding products that you have purchased. For example, the information provided on an invoice not matching the label on a product. This could be an indication of document fraud.
- A potential new customer or supplier using poor grammar and spelling across all business documentation such as emails, invoices, and the business website.
- Claims from suppliers which go against your own horizon scanning/knowledge of your sector and supply chains. For example, if a supplier has a large amount of an ingredient available for sale at a low price when your own research suggests that that ingredient is currently in short supply or commanding a higher price than usual.
- Prices that appear too good to be true could be an indication of fraud. For example, exclusive offers and discounts on products that are currently hard to get hold of or hold a higher price.
- Staff within the businesses acting in a defensive manner and not willing to share duties or information or attempting to maintain sole control over systems.
- Unusual cash transactions within the business.

Please note: The signs listed above do not necessarily mean food crime has occurred nor is this list exhaustive however, they are indicators that should be thoroughly investigated by a business to protect themselves from becoming a victim of food crime.

## **What you can do to protect your business, staff and customers**

You do not need unlimited resources and a dedicated team of experts to protect your staff, customers, and business from the risk of food crime. There are simple steps that you can take to build your resilience against food crime and potentially prevent yourself from becoming a victim.

## **Review what you already have in place**

It is important that you think about the processes you already have in place to protect your business from food crime. Is there more that can be done to strengthen your resilience? The National Food Crime Unit has created the [Food Fraud Resilience Self-Assessment Tool](#) which is a quick online resource you can revisit whenever you want, as often as you want. The tool has been designed to help food businesses in assessing their resilience to food crime.

Businesses who complete the food fraud resilience self- assessment tool also have the option to take part in our full fraud assessment, facilitated by our prevention team who are accredited counter fraud professionals via Cifas. The main aim of the assessment is to look at businesses' approach and resilience to food fraud within their organisation in more detail. Businesses have removed suppliers and restructured their response to fraud as a result of completing the full assessment.

## **TACCP and VACCP**

Develop and implement a Threat Assessment and Critical Control points (TACCP) and Vulnerability Assessment and Critical Control Points (VACCP) assessment. Both are closely aligned to HACCP and approached in a similar way. However, whereas HACCP focusses on food safety TACCP and VACCP focus on food defence and vulnerabilities within your supply chain. More information can be found in the [PAS 96:2017 Guide to protecting and defending food and drink from deliberate attack](#).

## **Know your supply chains**

Supply chains are becoming more and more complex. The longer your supply chain the less control you have over it, and the more opportunity there is for something to go wrong. Therefore, it is vital that you know and understand who is operating in your supply chains, the processes and procedures they have in place and be willing to challenge them on this. Constantly review your supply chains and identify the vulnerabilities where fraud may occur, think outside the box and seek to address the vulnerabilities you identify.

## **Anti-fraud culture within your workplace**

Regardless of the size of your business or workforce it is vital that you create a real anti-fraud culture. An anti-fraud culture means that all staff are encouraged to raise any concerns that they may have without the fear of any negative repercussions. Indications of food crime may be small and creating and maintaining an anti-fraud culture will mean that staff feel able to report anything that they think is not right. It will help to ensure that throughout the business, doing the right thing is the norm.

Ways that you can create and maintain an anti-fraud culture include:

- Set a tone from the top – ensure that senior management within the business are committed to creating an anti-fraud culture and are always leading by example.
- Ensure that staff receive appropriate training and information and are aware of fraud and how to spot the signs.
- Create an open culture where staff feel able to speak up at any time.
- Implement an effective internal whistleblowing procedure and also sign post employees to external avenues such as [the NFCU food crime confidential hotline](#). All information is

treated sensitively within the NFCU more guidance on how we protect your information can be found on the NFCU [working together with industry page](#)

- Promote any policies and procedures that you have in place to detect and prevent fraud within your organisation.
- Take swift and decisive action if fraud does occur within your business.
- Make your suppliers aware of what you are expecting from them and then highlight any action that will be taken if they fail to meet these expectations.
- Highlight and communicate all fraudulent incidents or identified wrongdoing and the resultant outcomes across and throughout the business. Encourage reporting of suspicions relating to food crime to the NFCU.
- Emphasise a zero-tolerance approach to fraud.

## Due diligence

It's in your interests to check carefully who you're dealing with in order to help you avoid being unwittingly caught up in a fraudulent transaction or supply chain.

It's good commercial practice for businesses to carry out checks to establish the credibility and legitimacy of their customers, suppliers, and supplies.

It is important to note that these are guidelines and will vary depending on your business however they are key areas to consider when making a judgement on the integrity of your supply chain and the suppliers, customers, and goods.

- Businesses trading within a market should know sensible prices for the goods on any given day. If goods are offered at price that seems too high or low, then you should find out the reason for this before purchasing goods.
- Utilise your bank to verify the bank account details given for the person buying/selling goods.
- Check the legitimacy and existence of a 3rd party business who requires payment.
- Check the traceability of a product to ensure its claim of origin are true. It is good practice to ask questions to suppliers of businesses you are working with to ensure their claims are true about the goods you are purchasing. Also, mass balance checks can help verify traceability of products as it allows you to spot any false claims or anomalies.
- Insist on personal contact with a senior representative of the prospective supplier, making a physical visit to their premises where possible
- Check all paperwork for any inconsistencies such as invoice numbers and poor grammar. Basic checks like these can help spot potential signs of fraud.
- Obtain credit checks or other background checks from an independent third party
- Check the business on Companies House to ensure they match the information you have been given and/or request a copy of their Certificate of Incorporation.
- Check there is a padlock icon in the left-hand corner of the URL when accessing the business's website. If not this shows the site is unsecure, and though not a direct sign of fraudulent activity the vast majority of legitimate businesses operate from a secure site. An unsecure site should alert you to be extra vigilant during due diligence checks, particularly if transactions are conducted via the site.
- Use internet searches to ensure the address given by the business is not only valid and matches the address provided but is also an address fitting of the business, e.g., industrial estate or residential street.
- Check the business and employee(s) on social media platforms. It's important to check that the information shown on the employee(s) social media matches the information given on the business platform. Does the employee have the business as a current place of work? Does the business platform list the employee(s) job title/role? Do not be afraid to message them on these platforms to double check. Social media platforms can also be cross referenced with [Companies House](#) to ensure that the company directors listed match.

- Implement a mandatory policy for hauliers whereby if a driver receives a change of address while in transit, they stop immediately to check with head office.
- Double check all new supplier details such as email and contact numbers provided. Good practice to implement is to find out who the business personnel are via internet search and if you can find contact details for them in order to verify.
- Do not be afraid to ask for a deposit or full payment upfront. This is not an unreasonable ask, especially if this is your first time working with the business.
- Be aware of sudden approaches to do business or an aggressive sales tactic. This may be a sign of an individual trying to apply unnecessary pressure, which may cause you to fall victim to fraud.

If your checks indicate that there may be a fraud you should consider whether you wish to continue with the transaction. If you have any concerns, you can report them to NFCU via any of the means provided below.

## **Horizon scanning**

Horizon scanning is a method of identifying trends in your area of business and risks that might affect your organisation.

Do everything you can to forecast any potential issues and plan for them ahead of time. Look out for incidents of food crime that have occurred in your sector or wider food industry. Has a business that is similar to yours been a victim of food crime? Always think how you can protect your business if something similar were to happen to you.

Keep up to date with what is happening in your sector and how things such as crop shortages, staff shortages in your supply chain and major world events may affect your supply chain and be prepared.

Trade associations, accreditation bodies, or industry groups/forums can be a helpful resource to understand problems being faced in specific sectors, but to also report concerns to.

## **Staff training**

All staff must be aware of the threat that food crime poses to the business. It is best practice to carry out training sessions within your organisation, include information in induction packs for new starters. Ensure that this knowledge is refreshed, and all staff are aware of potential signs of food crime and what to do if they spot something. Make sure that information on food crime is available to all staff.

## **Robust customer complaints policy**

Complaints about food products may be an indication that there is a wider issue. Having the correct policy in place to capture and investigate any complaints may help to pick up on things in good time. Some key things to look out for in customer complaints may include poor quality, difference in taste or difference in appearance.

## **Put food crime on the agenda**

Finally, talk about food crime within your business and ensure that your staff know what to look out for. Just like food safety and health and safety, the risk posed by food crime should always be something that you are considering in the day to day running of your business. Desktop exercises may be something you wish to implement to help raise the awareness of food fraud within your business. These exercises could be developed internally depending on how tailored you wish to make the training for key departments/staff, or you may opt for more generic training that can be

sourced externally. It is important that all employees have access to fraud training as it allows them to feel more empowered to identify and report fraud.

## **Reporting incidents of food crime**

If you have any suspicions of food crime or think that you have been a victim, you can report to the NFCU.

There are a few different ways that you can let the NFCU know about incidents of food crime.

### **Food Crime Confidential**

Call: [0800 028 1180](tel:0800 028 1180)

For non UK Mobiles or calls from overseas: [020 7276 8787](tel:020 7276 8787)

### **Email**

Email us at: [foodcrime@food.gov.uk](mailto:foodcrime@food.gov.uk)

### **Online confidential reporting tool**

[Report a food crime](#)

If you want to know more about food crime and what you can do to reduce the risk to your business, get in touch. You can contact the unit's Prevention team at:

[NFCU.Prevention@food.gov.uk](mailto:NFCU.Prevention@food.gov.uk)

## **Useful resources**

### **Food Fraud Resilience Self-Assessment Tool**

The [Food Fraud Resilience Self-Assessment Tool](#) guides food business owners and employees through a series of questions designed to help them identify the risk to their business from food crime, and outlines steps that they can take to mitigate this.

Businesses can complete this anonymously or choose to share their details with the National Food Crime Unit (NFCU) to receive tailored advice and support.

### **National Food Crime Unit In-Depth Fraud Resilience Assessment**

Following completion of the Fraud Resilience Self-Assessment Tool the NFCU's Prevention team are offering industry partners the opportunity to participate in a more in-depth fraud resilience assessment. Through this we are looking to understand businesses' current processes and provide further advice on how these could be strengthened. In an informal interview format, the Prevention team will speak with key representatives from different areas within an organisation and analyse the risk level in each of these. Answers given will be reviewed by the Prevention Team and a follow up meeting will be arranged to discuss the responses given. During this meeting we may give the business some advice on how they can build their resilience, or discuss good practice identified.

### **NFCU Working Together document**

The NFCU has published [Working Together with Industry guide](#) which explains our role in fighting food crime, how we can support industry, and how industry can support us.

## National Food Crime Unit Control Strategy

The [NFCU Control Strategy](#) outlines our current food crime priorities, and the actions we are taking to prevent food crime, deter and disrupt food criminals and bring offenders to justice. We also highlight areas where we are developing our understanding in order to improve our approach to tackling food crime. These priorities are refreshed regularly, with an annual update usually published on the food.gov website.

## National Food Crime Unit Industry Newsletter

The Industry Newsletter is released via email on a quarterly basis.

Its main aims are to:

- highlight the key risks and issues that may be having an impact on the food industry
- share best practice in order to strengthen the industry's response to food crime
- highlight the ongoing work of the NFCU

If you work in the food industry, [sign up to the National Food Crime Unit Industry Newsletter](#).

## PAS 96:2017

[Guide to protecting and defending food and drink from deliberate attack](#)

## Food Authenticity Network

[Food Authenticity Network](#) is a free-to-sign-up online resource, funded in part by government departments across the UK. You can sign up to receive free email alerts on food authenticity matters, including relevant news stories around food fraud and authenticity, and developments in terms of analytical methods. The website also offers a range of resources, including links to training events, as well as details of analytical centres of expertise for various authenticity methods. This online resource can be both a source of online reference, and, through the email alerts, an input into horizon scanning processes.

## Academic papers

Defra and FSA have funded research which businesses may find helpful to inform their own counter-fraud strategies.

- [What Works to Prevent Food Fraud](#)
- [Review of Food Fraud Drivers and Mitigation Tools](#)

## Annex: Food business operator / manager checklist

Task	Completed
I have completed the NFCU's Food Fraud Resilience Self-Assessment Tool to review what I have in place to protect my business from the threat of food crime	
I have completed the NFCU's In-Depth Fraud Resilience Assessment	

Task	Completed
Staff training for both established staff and new starters includes a section on food crime	
I am working towards developing and maintaining an anti-fraud culture within my business	
My staff are aware of the risks that food crime may pose to the business and potential indicators of food crime to look out for	
I have a TACCP/VACCP	
I have a robust policy for due diligence in place within my business	
I have a risk register for products we buy/sell	
Our audit regime is wholly unannounced	
I have a counter fraud strategy which is reviewed annually or less	

## Download the checklist

WORD

[View Food business operator checklist as Word\(Open in a new window\)](#) (13.76 KB)

## About the National Food Crime Unit

The National Food Crime Unit (NFCU) is a dedicated law enforcement function of the Food Standards Agency (FSA). The unit provides leadership on food crime across England, Wales, and Northern Ireland. The unit works closely with the Scottish Food Crime and Incidents Unit within Food Standards Scotland.

The NFCU is tasked with protecting consumers and the food industry from food crime within supply chains, working with the food industry to ensure that our food is safe and what it says it is. It seeks to ensure the food industry are well-informed of food crime risks and can implement measures to protect themselves from food crime. This ensures production, manufacturing, and retail sectors are hostile environments to individuals or groups intent on offending.

As part of the Food Standards Agency, our Mission is to identify, investigate, disrupt and prevent the most serious cases of food fraud.

We protect consumers and legitimate businesses by conducting intelligence-led food fraud investigations, by strategically assessing and communicating the food crime threat, and through food crime prevention activity with regulators, government and industry.

[Find out more about the NFCU.](#)