

Performance Management Framework for Food Standards Delivery Model.

FSA BC 25/12/05 - Report by Nathan Philippo

1 Summary

1.1 The paper updates the Business Committee on the rollout of the Food Standards Delivery Model (FSDM) in England and Northern Ireland. It sets out how we propose to approach the performance management of Local Authorities (LAs) as they start operating the new model, in light of the historical challenges that are facing LAs and the FSA.

1.2 The Business Committee is asked to:

- **Comment on** the proposed performance management framework for England which lays out the FSA's expectations for (LAs) to deliver food standards controls in accordance with their legal and statutory obligations prescribed within the Food Law Code of Practice (the Code) over a period of three years, incorporating regular reviews to monitor progress and challenge unacceptable performance.

2 Introduction

2.1 LAs are responsible for enforcing compliance with food safety and standards legislation for most food businesses ([footnote 1](#)). The FSA has statutory duties to monitor and report on their performance in doing so.

2.2 In 2018 the Board agreed to the development of a new food standards model, recognising that a new approach was needed. The new model was developed to enable LAs to make better use of the resources they have, with intervention frequencies that are more risk-based and potential for greater use of intelligence to inform action. Lack of confidence in the old model effectively targeting resources to the highest risk establishments, coupled with prolonged LA under investment in officer numbers, had already led to poor delivery against required intervention frequencies for some years.

2.3 The new model was introduced this year. The process of introducing it has given us a deeper understanding of the impact of the reduction in resources by LAs over time to deliver their food service and the scale of the challenge they now face. This is most visible in the large backlogs of overdue interventions.

2.4 The underlying concern is that many LAs lack the resources to meet their legal obligation to deliver interventions at all food business establishments. The new FSDM introduces a better approach for LAs to assess and manage risk, prioritise interventions, and use intelligence more effectively—for example, by considering allergens. However, while the frequency of interventions may have changed, the legal requirement for an intervention at every establishment remains unchanged under the new FSDM. The new FSDM corrects inaccuracies in some LA datasets, which means that in the short term the backlog will appear to worsen. The new FSDM exposes

these issues and forces both the FSA and LAs to face the reality of the system and work towards a shared understanding that more accurately reflects actual risk.

2.5 The reasons for this decline have been driven by decisions made by both the FSA and LAs, some of which have resulted in unintended consequences:

- The reduction in funding available to food teams by LAs has resulted in a steep decline in officer numbers starting in 2011, which has left us with almost a 50% reduction in posts. This is most severe at English county councils, where performance against code requirements is lower.
- Some LAs have developed service plans based on flat funding levels rather than in response to need. This has had a knock-on effect on the accuracy of their establishment data, which appears to have been altered to facilitate this.
- The FSA decision to withdraw from performance management of food standards controls by LAs in 2015 due to the recognised failures of the old model has resulted in a lack of appropriate challenge to those local authorities affected by the first two points. With hindsight, a more rigorous approach would have been more appropriate.

2.6 It is important to reflect that the underlying risk to the consumer presented by businesses has not materially changed. The new FSDM should result in a far more accurate understanding of the level of risk and the resource needed to effectively manage it. However, although the new model will lead to improvements over time, it is clear that LAs will not be able to comply with all its requirements straight away. This paper presents the pragmatic manner in which the FSA proposes to work with LAs over the next few years to achieve that transition towards full compliance. The plan will be regularly reviewed to monitor progress given the complex challenges facing LAs including finance, local government reorganisation and recruitment and retention of qualified staff to deliver the service.

3 FSDM Rollout

3.1 The rollout of the FSDM has presented significant challenges, in the main due to issues with Management Information Systems (MIS) being upgraded to record and report in accordance with the model. Once fully implemented, this will give the FSA a better understanding of those LAs who are struggling to fulfil their obligations but have yet to accept the reality of their situation or not provided the FSA with accurate information necessary for us to determine that on our own.

3.2 In March 2025, the new FSDM requirements were introduced into the Code. Progress has been made and, as at mid-November 2025, 150 of the 154 impacted LAs across England and Northern Ireland have self-reported that they are implementing the new model. Of these, 96 LAs have indicated that their MIS has been updated to reflect the requirements of the new model, with the remaining 54 LAs at various stages of progress but still using temporary recording solutions pending MIS update. We continue to work with the four LAs that have not yet indicated that they are implementing the new model, to understand the specific circumstances and consider the need for escalation. Despite the progress made, significant challenges remain, particularly in respect of the level of confidence for LAs to carry out necessary data reporting. This will continue to be a cause for concern until we can get the necessary reassurances from LAs and their MIS providers.

3.3 Rollout of the new FSDM continues to be a priority programme of work. Delays because of MIS providers failing to provide LAs with the required software updates, and issues with data

conversion, have impacted on the planned rollout schedule. While our expectation remains that all LAs with responsibility for food standards will be implementing the new model by 31 March 2026 and be able to report data to the FSA, we must be mindful that long standing issues with quality of data may affect the level of accuracy of some of the responses. Whilst we are providing support and taking action now, ultimately it is each LA's responsibility to have regard to the Code. We continue to support LAs with single points of contact and are closely monitoring progress, as failure to accurately report is grounds for performance management in its own right.

4 LA Performance on Food Standards

4.1 In England, meaningful performance management ceased in 2015 when the previous Food Standards Delivery Model (FSDM) was deemed unfit for purpose. It was reinstated in 2021 to monitor progress against the COVID-19 Recovery Plan, with an expectation across all three countries that Category A interventions were completed, along with any work required for businesses affected by new legal requirements on food information for Pre-Packed for Direct Sale (PPDS) foods. After the Recovery Plan ended, the FSA issued guidance to all LAs, setting a clear expectation to resume delivery in line with the Code. In England, performance management continued to focus on Category A interventions, while Wales and Northern Ireland (NI) returned to monitoring all categories (A–C). These differences reflected that Wales had not yet implemented the new FSDM, and NI had maintained resource levels, avoiding significant backlogs. New allergen legislation, now embedded in the risk assessment framework of the revised FSDM, has reinforced the importance of delivering official food safety controls.

4.2 Performance data in relation to FS evidences the scale of the challenges and why it will take time to transition towards full compliance with the Code. The full data described below can be found in **Annex A**:

- Table 1 shows the percentage of interventions achieved at establishments that were due an intervention. Reassuringly, in England the figure for Category A was 78% in 2019/20 (pre-pandemic) and in 2024/25 that figure stood at 90%. However, for Category B and C where the bulk of establishments sit, the numbers achieved in 2019/20 were 29.7 and 32.4% compared to 17 and 16% respectively in 2024/25. Table 2 shows the actual number of overdue interventions, for England this was 126 Category A, 56,647 Category B and 65,094 Category C in 2024/25.
- Table 3 shows the volume of establishments that have never received an initial intervention (unrated with an unknown understanding of the business compliance for food safety as it has never been visited) sits at circ 83,000 establishments. During the data conversion process to the FSDM, large numbers of backlogs of essentially unrated premises have been identified, indicating that the scale of this problem, whilst now becoming clearer, is a significant cause for concern.
- Table 4 shows the reduction in FS resources from 2012/13 through to 2024/25, reducing from 445 in England to 269 full time equivalent staff.

4.3 The new FSDM now in place will enable LAs to make better use of the resources they have, with intervention frequencies that are more risk-based and potential for greater use of intelligence to inform action. However, it does not solve the underlying resourcing problems in LA food standards teams. LAs have reported to us that, even with additional funding, they still face challenges recruiting competent and qualified people.

4.4 Given this history, we consider it will take the majority of LAs quite some time (years) to reach full compliance with the new Code in England. We therefore recommend that we set, for performance management purposes, a risk-based, proportionate and graduated timeline for LAs to realign and deliver in accordance with the Code, in a similar manner to the recovery plan introduced during the COVID-19 pandemic.

4.5 There are not the same performance issues in LAs in Northern Ireland and current data indicates their performance is not at a stage that a performance management framework is required. As such FS delivery against the Code requirements will continue to be monitored and managed as previously. When the FSDM is implemented in Wales then further consideration will be needed on whether to implement something similar and this will remain under review.

5 Performance Management Framework

5.1 Due the challenge of completing all required interventions, including accumulated backlogs, and the number of resources removed from the system over many years, we must be realistic that full delivery of the Code requirements will take time. However, the FSA cannot approve a deviation from the Code and LAs acting as competent authorities have a legal statutory duty to have regard to the obligations within it. We therefore need an approach to performance monitoring and management that takes us to full compliance with the Code whilst recognising that LAs will be building their capability. LAs have requested clarification of the FSA's expectations for delivery of the FSDM and what will trigger performance management thresholds.

5.2 The FSDM and flexibilities within the revised Code (October 2025) will help support LAs delivering their service in a risk-based way. Recruitment and retention of competent and qualified staff remain a significant challenge, and our proposed performance management framework has been developed to recognise the necessity for LAs to grow their resources over time. The framework places a clear emphasis on service planning and looking ahead for the resources that will be required to achieve each milestone and to consider utilising less qualified support officers, trainees and apprentices where appropriate to grow their teams.

5.3 The full performance management framework can be seen in Annex B and is intended to give clear expectations to LAs on the timeline for recovery, however, it should also be noted that the FSA expects that where possible, quicker progress is made in the interest of consumer safety. While the framework has been aligned to annual end of year reporting and their service planning arrangements to ensure no additional burden is placed upon LAs, we will continue to monitor their progress via the biannual data collection process.

5.4 The issues of LA performance are far more pronounced in English county councils than their equivalents in Northern Ireland so we must recognise the different operating environments that now exist. A performance management framework will not be necessary for LAs in NI as they are already exceeding those milestones. Crafting expectations and communicating them effectively will take careful consideration to ensure that those LAs doing a good job are both recognised and do not reduce current levels of service.

5.5 Presenting clear expectations to LAs now will allow LAs to begin the planning process to meet the framework milestones to mitigate this risk and reduce the numbers requiring performance management intervention.

6 Conclusions

6.1 The situation in relation to food standards has been complex and challenging in transitioning LAs to the new FSDM, but the fact remains that the reduction of resources delivering food standards by LAs is of the highest concern. Even when the difficult journey to transition to the new FSDM has been achieved, LAs will still face issues in being able to deliver interventions at all food establishments in line with their legal and statutory obligations.

6.2 The current known level of deviation from delivery in accordance with the Code requires addressing by the FSA. However, given the time it has taken to reach the current position and the loss of resources delivering FS, it will take time for LAs to fully realign with the Code. The FSDM and the new Code (revised October 2025) will help support LAs in growing their resources

over time as there are some new flexibilities that allow competent but less qualified staff to undertake interventions at some of the lower risk establishments. This affords the opportunity to bring in trainees / apprentices and regulatory support officers on career pathways and grow the resources in the system, whilst managing risk effectively. The addition of the performance management framework, with clear milestones for LAs to achieve, can be regularly monitored by the FSA to ensure unacceptable progress is challenged.

6.3 The Business Committee is asked to:

- Consider and comment on the performance management framework.

Annex A

FS performance data

Table 1 – FS interventions achieved that were due in the reporting period

A-Rated			B-Rated			C-Rated		
England	Wales	NI	England	Wales	NI	England	Wales	NI
75.5%	90.8%	94.7%	29.7%	60.3%	89.9%	32.4%	61.5%	80.6%
28.0%	39.0%	73.0%	17.0%	16.0%	38.0%	17.0%	18.0%	23.0%
74.8%	66.6%	80.2%						
86.5%	97.6%	100.0%						
83.4%	91.8%	100.0%	11.8%	32.7%	74.7%	11.7%	34.6%	73.0%
90.3%	94.7%	96.3%	17.0%	43.9%	75.9%	16.0%	34.7%	51.5%

Table 2 – FS establishments that were overdue an intervention by volume

	A-Rated			B-Rated			C-Rated		
	England	Wales	NI	England	Wales	NI	England	Wales	NI
2022/23	542	6	0						
2023/24	288	11	0	59,121	2,986	139	71,398	3,791	1,040
2024/25	126	7	3	56,647	2,065	149	65,094	3,492	833

Table 3 – Volume of FS establishments that are awaiting a first inspection (unrated)

	England	Wales	NI	Total
2022/23	85,595	5,635	519	91,749

	England	Wales	NI	Total
2023/24	87,381	5,270	394	93,045
2024/25	83,361	3,897	285	87,543

Table 4 – FS FTE – number of occupied posts (available resources in the system)

	Occupied FTE posts			
	England	Wales	NI	Total
2012/13	445	55	60	560
2013/14	347	49	47	443
2014/15	301	44	48	393
2015/16	269	48	35	352
2016/17	256	55	31	342
2017/18	245	57	35	338
2018/19	272	51	30	354
2019/20	266	47	34	347
2020/21	147	19	24	190
2021/22	279	45	28	352
2022/23	252	53	28	343
2023/24	304	64	27	394
2024/25	269	62	29	360

Annex B

Performance Management Framework with timeline milestones

Timeline	<p>FSA EXPECTATIONS – All expectations should be treated as a minimum and where a LA can deliver their legal obligations within the Code or make quicker progress than those below, they are expected to do so.</p> <p>Dates used for the timeline are linked to end of year reporting, the expectation is that interventions are delivered when due or quicker if intelligence or other factors require a quicker response.</p>
----------	---

End of March 2026	<ul style="list-style-type: none"> • A full database conversion has been completed for all establishments (including backlogs) and the new FSDM risk rating score applied to identify the frequency of next intervention or Inherent Risk (IR) score for establishments that have yet to receive a first intervention (including unrated backlogs). • Priority interventions (1,3, and 6 months) identified during the transition to the FSDM have been completed in line with due intervention frequency. This refers to establishments where compliance has been determined on a previous intervention. • All establishments with an Inherent Risk of 1 or 2 identified during the data conversion, including those within unrated backlogs, have received a first intervention. • The LA can report to the FSA with accurate and reliable data. • A service plan which includes the service demand and resource requirement to meet demand and achieve the next years milestone.
End of March 2027	<ul style="list-style-type: none"> • All priority interventions (1,3 and 6 month) have been completed. This includes any overdue interventions from backlogs or establishments whose risk rating increased when applying the new score in the data conversion process. • New Business Registrations received from 01 April 2026 have been dealt with in accordance with the Code – <ul style="list-style-type: none"> ◦ IR score 1 or 2 = 28 days ◦ IR score 3 or 4 = 3 months ◦ IR score 5 = 6 months • Any historic backlogs of unrated establishments identified as high priority (IR 1 or 2) during data conversion process or desk top assessment have received an intervention. • An updated service plan to include the resources required to meet demand, including achieving the next years milestone.
End of March 2028	<ul style="list-style-type: none"> • All priority interventions (1, 3, 6 month) due / overdue have been completed. • All interventions required within 12 months have been completed. • New Business Registrations received from 01 April 2027 have been dealt with in accordance with the Code. • All medium risk historic backlogs of unrated establishments (IR score 3 or 4) where no first intervention has been delivered, have received an intervention. • An updated service plan to include the resources required to meet demand, including achieving the next years milestone.
End of March 2029 and future years	<ul style="list-style-type: none"> • All priority interventions (1, 3, 6 month) due / overdue have been completed. • All interventions required within 12 months have been completed. • All interventions required within 24 months have been completed. • New Business Registrations received from 01 April 2028 have been dealt with in accordance with the Code. • All low risk historic backlogs of unrated establishments (IR score 5) have received an intervention. • An updated service plan to include the resources required to meet demand, including all interventions due as prescribed by the Code. frequencies

1. As part of the Food Standards Agency duties under the Food Standards Act 1999, and in accordance with the requirements of Regulation (EU) No 2017/625 (OCR) on official controls (retained law in England and Wales).