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# **Local Authority Capacity and Capability research**

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**July 2023**

**Ipsos UK**

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## Glossary

- ACTSO: Association of Chief Trading Standards Officers (Professional leadership for Trading Standards from Local Authority). ACTSO operates in England and Wales.
- ACEHO: Association of Chief Environmental Health Officers. A body representing Professional Leadership for Environmental Health from Local Government. ACEHO operates in England.
- Apprenticeships: an apprenticeship is employment with training in a recognised occupation, involving both on and off the job training and an independent end-point assessment. Mentions of apprenticeships in this report also refer to a trainee course undertaken by students already working within the field, allowing them to train and gain skills alongside their regular job roles. Apprenticeships include:
  - RCO - Regulatory Compliance Officer apprenticeship Level 4
  - TSP - Trading Standards Practitioner Professional Apprenticeship Level 6
  - EHP - Environmental Health Practitioner Apprenticeship Level 6
- Competent Authority (CA): has the meaning as defined in Article 3(3) of Regulation (EU) 2017/625 to mean the Competent Authority responsible for the performance of official controls and of other official activities, in accordance with that Regulation and the rules referred to in Article 1(2).
  - For the purposes of the report, the FSA hold oversight and organisation of the official food and feed controls and the policy for most activities in England, Wales & Northern Ireland. The FSA have official control delivery responsibilities at specific approved premises. Local/Port Health Authorities are competent authorities for the purpose of delivery of official food and feed controls at food and feed premises which the FSA do not have jurisdiction in.
- CIEH: Chartered Institute of Environmental Health (Recognised professional membership body for the Environmental Health Profession). CIEH operates in England, Wales and Northern Ireland.
- Competency Framework - The Food Standards Agency's (FSA) Competency Framework is designed to set a consistent standard that applies to all food and feed controls that are within the FSA's responsibility as the competent authority in England, Wales & Northern Ireland and are delivered by Local/Port Health Authorities, the FSA and FSA delivery partners.
- CPD: Continuing Professional Development. This is learning undertaken by professionals to increase their knowledge, understanding and experience relevant to a subject area or role. This may be required by a professional body, employer or the Food Law Code of Practice.
- CTSI: Chartered Trading Standards Institute (Recognised professional membership body for the Trading Standards profession). CTSI operates in England, Wales and Northern Ireland.

- Distance learning: Lectures and seminars conducted virtually (such as through Zoom or MS Teams), allowing students to learn from home, without the need to attend universities or colleges in person.
- Early careers staff: People new to Environmental Health and Trading Standards professions and embarking on their careers, particularly in local authorities. This includes trainees, apprentices, recent graduates from relevant courses, and those completing their initial professional qualifications and competencies.
- Education pathways: Different routes to gaining qualifications relevant for Environmental Health and Trading Standards professions.
- Feed Law Code of Practice (FeLCoP): The Feed Law Code of Practice sets out instructions and criteria to which local authorities must have regard when discharging their duties concerning the delivery of official feed controls and other official activities.
- Food Law Code of Practice (FLCoP): The Food Law Code of Practice sets out instructions and criteria to which local authorities must have regard when discharging their duties concerning the delivery of official food controls and other official activities.
- LA: refers to Local Authority(s): organisations which are responsible for local public services and facilities in a particular regional area/locality. This includes the different types of local authorities: county councils, district, borough or city councils, unitary authorities, London boroughs, and metropolitan boroughs.
- LGA: Local Government Association (membership body for Local Authorities). LGA is a politically led, cross-party organisation that works on behalf of councils to ensure local government has a strong, credible voice with national government.
- Official food and feed controls: activities performed by the competent authorities in order to verify compliance with feed and food law, animal health and animal welfare rules.
- Purposive sampling: a group of non-probability sampling techniques in which units are selected because they have characteristics that you need in your sample.
- Smarter Communications: The digital communication system used by the FSA to send official communications to local authorities.
- Snowball sampling: a non-probability sampling technique in which the samples have rare traits. This is a sampling technique in which existing subjects provide referrals to recruit samples required for a research study.
- Suitably/ appropriately qualified and experienced officers: officers who meet the qualifications and experience requirements set out in the Food and Feed Law Codes of Practice.

# Executive Summary

## Background and objectives

The FSA has a key role as the central competent authority in overseeing official food and feed controls undertaken by local authorities. This supports the delivery of the FSA's mission, food you can trust, and helps ensure food is safe and what it says it is. The FSA seeks to work in partnership with local authorities to help them to deliver official food and feed controls.

Local Authority (LA) Environmental Health (EH), Port Health and Trading Standards (TS) teams deliver official food and feed controls using a range of interventions as set out in the Food Law Code of Practice (FLCoP) and Feed Law Code of Practice (FeLCoP). They are instrumental to the delivery of the FSA mission, across England, Wales and Northern Ireland to ensure consumer confidence and protect public health.

Evidence from professional bodies, LAs and wider sources suggests that LAs are experiencing significant issues around the recruitment and retention of suitably/ appropriately qualified and experienced officers.<sup>1</sup> The FSA commissioned Ipsos UK to carry out this initial phase of discovery research to understand more about the barriers and facilitators encountered by LAs in England, Wales and Northern Ireland.

## Methodology and sampling

This research aimed to build a holistic understanding of barriers and facilitators to the recruitment and retention of suitably and appropriately qualified and experienced officers across EH and TS career pathways, with a focus on delivering official food and feed controls.

A combination of online focus groups and in-depth interviews were conducted with key stakeholders, with the number of participants included in parentheses: current LA officers (29), former LA employees (10), education providers (11), professional bodies and leadership bodies (7 individuals from 4 organisations), LA managers (42), and students, including apprentices (36). The Local Government Association (LGA) also took part

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<sup>1</sup> The language of suitably and appropriately qualified staff reflects that used in the Food and Feed Law Codes of Practice. The Feed Law Code of Practice (FeLCOP) section 4.3. states "Competent Authorities must: ensure officers, involved in the assessment of compliance with feed law, hold an appropriate qualification" unless undertaking specified activities, while the Food Law Code of Practice (FLCoP) section 3.3.2 states "before Competent Authorities authorise or extend an officer's duties their lead food officer(s) must ensure officers: (a) carrying out official food controls or other official activities hold a suitable qualification, listed in sections 3.4.1, 3.4.2 and 3.4.3, relevant to their role, and the activities they will be authorised to undertake" unless undertaking specified activities.

providing contextual information. A Rapid Evidence Assessment (REA) of existing literature was also conducted (please see Annex B- reference list).

This report is based on qualitative findings and captures perceptions among key stakeholders. 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.

## Key findings

### Attracting people to relevant education pathways

To be authorised to deliver official food and feed controls, officers are required to be suitably/appropriately qualified. This research shows that:

- The numbers starting and completing relevant qualifications to deliver official food and feed controls is not enough to meet demand in LAs, both in terms of overall supply of potential officers and relevant skills gained through study.
- Current students are motivated to apply to courses due to an interest in public protection and public health and safety, predisposing many to careers in LAs. However, the breadth of courses means students can choose between several specialisms and opt for careers unrelated to official food and feed controls.

Across stakeholder groups, participants attributed issues with recruitment of potential officers to three broad factors:

- Lack of awareness of EH/TS careers with scarce resources contributing to a decline in the level of awareness raising that LAs can do, particularly among school leavers.
- The complexity of the qualification system with multiple pathways making it hard for prospective students and LAs to navigate.
- Challenges around the practicalities of study, including financial constraints time and workload preventing individuals from starting or completing relevant courses.

As part of this research, efforts were made to identify how many students were applying to, studying and completing relevant EH and TS courses. This data was difficult to access consistently across education providers, limiting the extent to which it was possible to model student numbers.

## **Recruiting people on relevant education pathways to careers specialising in food and feed controls within LAs**

LAs seeking to recruit people to deliver official food and feed controls typically seek officers who have already demonstrated they have the required qualifications and experience. This research indicates that:

- Food and feed are relatively small aspects of both EH and TS professions, which means that not everyone on relevant education or professional pathways is aware of or interested in focusing on food and feed specialisations.
- There is a perception that the current model of achieving a suitable/appropriate qualification is not producing officers who can be authorised as competent without further professional development. Some LA officers and managers were also concerned that professional qualifications and the requirements of LA job roles were not always aligned.
- Resource constraints within LAs, including lack of resources to provide relevant training on the job and insufficient experienced staff, act as a barrier to bringing early career professionals up to full competence.
- Pay – especially for early careers including apprentices was viewed as relatively low and not necessarily competitive with other equivalent roles in LAs and elsewhere. This was seen as particularly problematic given high workloads and ongoing requirements for professional development.

## **Retaining suitably/appropriately qualified and experienced staff within LAs**

Once suitably/appropriately qualified staff have been hired and gained the professional experience to be authorised to deliver some or all official food and feed controls, the following issues were commonly reported as negatively impacting retention:

- A lack of career progression opportunities. This was linked to a reduction in headcount at different levels in LA regulatory teams, making them increasingly flat and limiting progression.
- Reductions in funding for LA regulatory teams contributing to increased workloads and reduced ability to participate in CPD. This was also described as making it harder to support early career professionals and promote the profession externally (e.g., visiting schools/careers fairs).
- Early retirement among experienced staff because of increasing workloads and challenges brought on by financial constraints and the impact of the pandemic. This was identified as having an impact in the reduction of experienced officers to support and train early careers staff.



- Amount and type of CPD required by the Codes of Practice as well as professional bodies such as CIEH. While perceived as necessary and valuable in principle, aspects of the current CPD offer were considered repetitive and to not adequately support individual skills and development.
- Changing nature of the role impacting job satisfaction. The pandemic, the UK's decision to leave the EU, and an increasing focus on the highest risk businesses were thought to have made the role more challenging over recent years.
- A less attractive employee offer. While levels of pay were one important aspect of this, other parts of the LA employment offer (broader terms and conditions, work life balance, vehicle allowances, pensions, flexibility, etc) were also perceived to have been (or as being) eroded.
- Perceptions that other types of employment and other employers have better offers in terms of pay, career progression, and work-life balance.

## **Perceived challenges with the FSA Competency Framework**

The research identified a key challenge across recruitment and retention of suitably/appropriately qualified staff related to the FSA Competency framework.

- LA managers and officers find the FSA Competency Framework difficult to use in practice. Managers reported challenges judging who can deliver which official controls. Similarly, officers found it hard to know what their qualifications allowed them to do, and therefore what roles they could apply for.

## **Suggestions for supporting the delivery of official food and feed controls**

Participants made a number of suggestions for potential ways the delivery of official food and feed controls could be supported. Their suggestions included promotion of EH and TS careers in LAs, schools and universities, greater collaboration across FSA and government department with regulatory responsibilities and education providers, and attracting more new students to training, promoting apprenticeship routes and simplifying qualification requirements, as detailed in the conclusion to this report.

## **Next steps**

The issues raised in this research are wide-reaching and are not all within the scope of the FSA's role and remit. A summary of responsibilities for official food and feed controls across different LA types and by nation is included in Annex D.

This Phase 1 research focused on discovery, aiming to achieve a more holistic understanding of barriers and facilitators to the recruitment and retention of suitably and appropriately qualified and experienced officers across EH and TS career pathways.

In Phase 2, the FSA will work with key stakeholders to assess the findings and recommendations from participants to:

1. Identify which findings are for the FSA to address in its role as the Competent Authority. The FSA will then review any associated recommendations from interviewees and assess the cost and deliverability of these to take forward a project which will tackle the issues identified.
2. Act as a convenor and collaborator to bring stakeholders together to assess the findings and recommendations that do not sit within the FSA's remit and to encourage collaborative working that seeks to address these issues.
3. Identify which findings the FSA has no remit to change and make clear where these will not be taken forward.

# 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

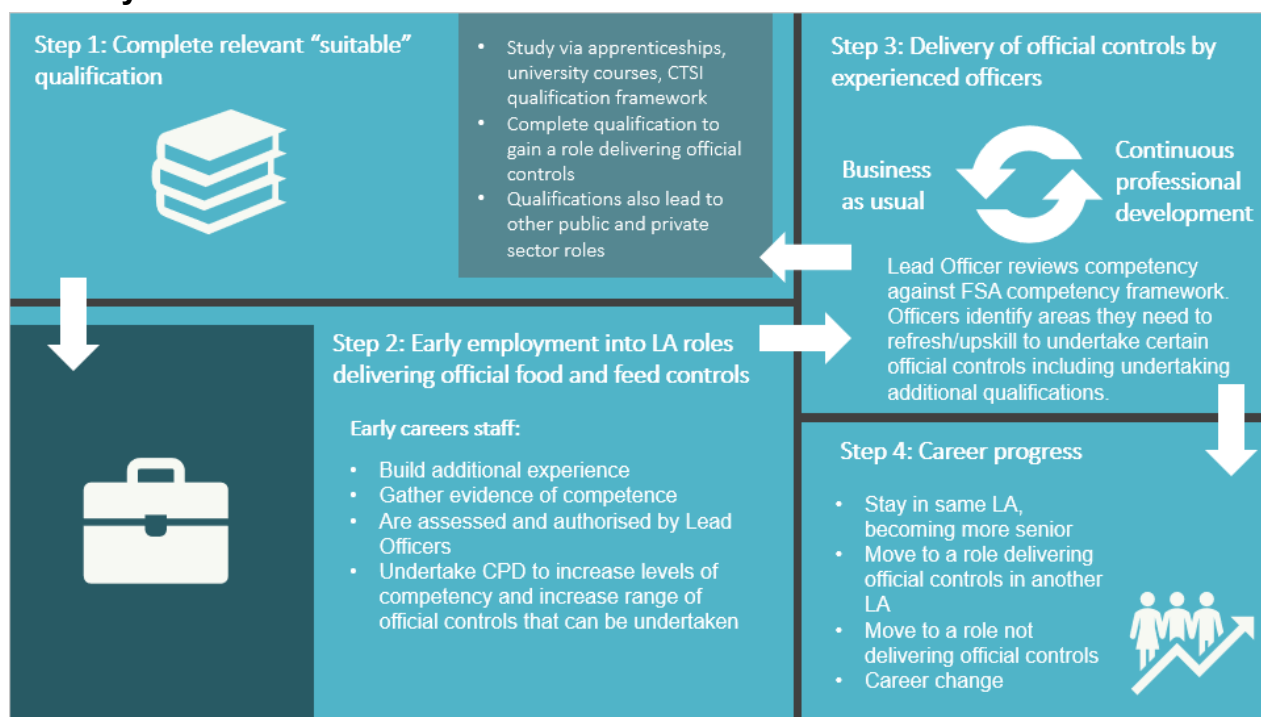
LAs must have 'a sufficient number of suitably/appropriately qualified and experienced officers to undertake risk-based controls in their area, as required by the Retained EU Regulations 2017/625 (England and Wales) and Regulation (EU) 2017/625 (Northern Ireland). People performing official food and 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.

**Figure 1: Overarching EH/TS Career Pathway**



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 (e.g., 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.

<b>Aspects of recruitment and retention</b>	<b>Most relevant stakeholder groups (although coverage across all)</b>
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 (e.g., 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 26<sup>th</sup> January – 16<sup>th</sup> 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, e.g., '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 criterion 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.

## Chapter 2: Attracting people to relevant education pathways

This chapter discusses perceptions of EH and TS education pathways, barriers faced by prospective and current students, and opportunities to raise the profile of educational pathways to support the future pipeline of staff to carry out food and feed official controls in LAs. Findings are primarily drawn from fieldwork conducted with professional and leadership bodies, education providers, and students (including apprentices).

As part of this research, efforts were made to identify how many students were applying to, studying and completing relevant EH and TS courses. This data was difficult to access consistently across education providers, limiting the extent to which it was possible to model student numbers. This will be explored further during follow-up work.

### General perceptions

This section summarises how stakeholders perceive the current landscape of EH and TS courses overall, with a focus on those at the early stages of the EH or TS professional journey. It does not aim to be comprehensive in terms of the range of possible routes to qualification to deliver food and feed official controls in LAs. Instead, the findings are intended to set out how EH and TS pathways are viewed in general. This provides context for findings set out later in the report about perceived barriers and opportunities around recruitment and retention of suitably/ appropriately qualified staff in LAs.

### Perceptions of current EH and TS courses

Education providers offer a range of different courses for those interested in starting a career in EH or TS. The universities who participated in the research were focused on undergraduate and postgraduate EH degrees (including Level 6-degree apprenticeships). Some universities also offer specific courses aimed at TS or other experienced professionals taking on responsibility for official controls not usually in their remit. A Level 4 Regulatory Compliance Officer (RCO) apprenticeship route is also available in England. When completed, the RCO apprenticeship can exempt an individual from the first year of the Level 6 Apprenticeship degree and Stage 1 of the CTSI professional competency framework.

### EH education pathways

Generally, EH courses cover five environmental health areas (Environmental Protection, Food Safety, Health & Safety, Housing & Communities, Public Health, as outlined by CIEH). Training students to be generalists in EH was viewed positively by education providers as this enables them to work in a range of roles once graduated. This approach also reflects the requirements for registration with EH professional membership bodies.

Education providers said that many mature students become interested in studying EH because of their interactions with EH professionals carrying out inspections in hospitality or other food settings. During their courses, students often find aspects of EH other than food equally or more interesting.

Most EH students were studying general EH courses across different education pathways, including Masters degrees at universities, undergraduate degrees at colleges and universities, and apprenticeship routes. Students were studying both full time and part time.

Some EH students had a view on which area of the profession they would like to specialise in, whilst others were undecided and open to different opportunities. Often previous experience in food safety or food preparation were key drivers for interest in food, and for seeking employment within food teams in LAs.

**“I already have a food background, so that is my strong point. But I would like to get the knowledge and experience on all the areas. Then from there, decide which one is my favourite.” (Student)**

Education providers also described running more specific food standards and food hygiene courses. These courses were seen by course leaders as beneficial for those who needed a qualification focused solely on food or feed. For example, one institution offers a conversion course for TS professionals to train in EH. This is a bespoke course which allows TS professionals to complete relevant EH modules, enabling them to retrain within one year. The course recognises their background in regulation through their TS qualifications. Typically, students on the conversion course are already employed within LAs but need a specific qualification to demonstrate their competence to deliver official controls. There were examples of this being needed because EH and TS teams were merging, requiring existing staff to broaden their professional expertise.

## **TS education pathways**

TS apprenticeships are currently the main education pathway for new TS professionals. These courses allow students to firstly achieve their Level 4 RCO qualification, which aligns with the CTSI Professional Competency Framework.<sup>2</sup>

Education providers delivering TS apprenticeships described strong working relationships with professional bodies, primarily with CTSI. Students on the TS apprenticeship pathway come from a wide variety of organisations, the majority of which are within the public

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<sup>2</sup> A Level 6 TS Professional apprenticeship has also been approved for delivery but was not launched at the time of the research.

sector, working within LAs and national regulators, and a minority of which work within the private sector.

Students with backgrounds or current employment within TS were also included in the research. They either studied on the TS apprenticeship route or were undertaking specific courses to broaden their competence (as described above). As such, in some cases, students had previously been working within TS and were taking conversion courses to train in aspects of EH relevant to their role. This enabled them to gain further knowledge and experience in addition to their existing qualifications. A further educational route is EH professionals undertaking training in TS. However, the research did not involve EH professionals undertaking TS courses, and therefore no findings about their experiences can be included within this research.

**“I'm doing the TSO compression course. My background is in trading standards, and I've moved across into a district council where we are doing port health work, environmental health work, trading standards work, so combined now really. So, that's why the qualification, the higher food qualification, is what I'm aiming to get. It's a compression course. So, it's 2 years compressed into 1 year, because we get recognition for our trading standards qualifications, and regulatory experience already.” (Student)**

Participants from TS backgrounds studying for the EH conversion course liked the modular approach and compression into one or two years. Completing this course enables these students to expand their skillset and their employment prospects within a shortened timeframe.

Students studying on TS apprenticeship routes were already employed within LAs, working alongside studying. These students wanted to retain their LA roles once their apprenticeships ended and felt this was likely to happen. TS apprenticeship students perceived that obtaining the qualification would provide themselves and their employers reassurance about their skillsets and enable them to develop their careers further as TS professionals.

## **Perceived profile of students**

According to education providers and students, while there was a mix of different professional backgrounds and ages for those studying EH and TS courses, students were typically mature or career changers. Those studying EH and TS apprenticeship routes were already employed within LAs, often in Regulatory Compliance Officer or equivalent roles, reflecting the requirements of these courses. Some were older, having developed an interest in regulation and public protection later in their career.

Participants studying EH undergraduate or Masters' courses at universities had a range of previous experiences, with some being already engaged in EH-related work, either

within LAs or in the private sector. Some were new to the EH profession, but they often had previous or current employment in related sectors such as hospitality.

**“I mean, I know there's a lot of different routes to qualification, I guess, and I know there's more emphasis now on Regulatory Compliance Officer, sort of, apprentice, whether that's encouraging people or not, I don't really know, because it's quite a broad qualification.” (Student)**

Education providers explained that EH undergraduate degree courses attract some school leavers, but these are typically the minority of students. This was echoed by student participants, who mentioned low numbers of school leavers on their courses. Education providers thought that low up-take from school leavers was due to the lack of visibility of careers in EH and TS among the public.

**“It's very rare we have someone who's 18 or 19, [it's] a complete novelty, so the demographics of our course are completely different to any other programme we have in the college. And we have had the odd student from further education in previous years, one or two, but as I said, it's the exception not the norm.” (Education provider)**

Education providers also noted a significant number of international students undertaking EH degrees in the UK. International students studying EH had similar motivations and interest as UK-based students and, like their UK-based counterparts, often had relevant professional experience in their home countries. University course leaders suggested that the uptake among international students may be due to the desirability of studying in the UK and may likely return to their home countries to seek employment. Some international students included in the research sought employment in the UK. The research could not determine how many international students go on to work in the UK.

## **Relationships between education providers and professional bodies**

Education providers describe strong working relationships with professional bodies, particularly CIEH in the case of EH courses at universities, including being accredited by CIEH. This was similar for CTSI and relevant education providers when it comes to TS apprenticeships.

CIEH develops frameworks for degree courses, working closely with academics and maintaining communication with course leaders to continually develop modules. This accreditation was perceived as vital by course leaders, particularly for attracting students. The frameworks help ensure that courses provided across the country maintain a consistent level of quality. Education providers who report particularly positive relationships with professional bodies have often been engaged in roles for professional bodies (e.g., sector boards).

**“We have ongoing conversations, only a few weeks ago we had the person responsible... coming in to talk to our students about the registration process. We regularly engage with them so that students are aware of the qualification process, so they can look ahead to know not just about completing the degree but what they need to do in the future.” (Education provider)**

The close working relationships that EH education providers have with CIEH enabled students to gain a deeper understanding of the career path, which was seen as complex. For example, several course leaders spoke of CIEH members speaking to their students to prepare them for the registration process once they graduate. To make progressing into careers easier for students, education providers also talk students through the process of registering with CIEH, have frequent contact with LAs regarding job opportunities, and ensure students gain interpersonal skills required by EH roles.

However, education providers find that roles advertised by LAs may not be most appropriate for their students. Often LAs require that applicants be professionally qualified (having completed the portfolios with six months of professional experience) rather than being open to take on new graduates. Education providers would like to see LAs provide more support and opportunities for EH graduates. This is something that will be considered in more detail in Chapter 3.

Those delivering TS apprenticeships, much like their EH counterparts, had strong working relationships with CTSI. The main education provider offering TS courses was highly engaged with CTSI and would often work with regional representatives.

The RCO apprenticeships are endorsed by CIEH and CTSI. These apprenticeships were seen as having been successful at attracting more people to join relevant educational pathways.

**“If [the Level 4 apprenticeship] had been specialised to one regulatory body then you wouldn’t get many people taking it on. But as it is wide reaching across all regulatory bodies, we have managed to get 200-300 people a year.” (Professional or leadership body)**

## **Reasons people chose EH and TS education pathways**

Students were often motivated to join EH and TS courses due to an interest in protecting public health and the technical aspects of regulation and carrying out inspections. They described wanting to protect the public and ensure things were done in the right way. An interest in food was often a factor, even for those who went on to specialise in other aspects of EH or TS during or after completing their courses.

The Covid-19 pandemic provided the catalyst for some current students to change from previous careers or seek further qualifications and experience. For example, one participant was made redundant from their job at a local charity so looked at starting a

new career. Another was self-employed prior to the pandemic and could no longer continue that work due to restrictions, so applied for a role at their LA, and this enabled them to discover the EH profession.

**“It’s an interesting course, it’s an interesting career, at the end of the day, from what I’ve seen. It’s something that you enjoy doing because as it has been paid for, getting the career out of it, you realise that you’re contributing, you’re saving people out there, which is important.” (Student)**

The relatively limited number of education providers offering EH university courses meant that most participated in distance learning. This was welcomed by students as it enabled them to complete their studies around their busy lives and jobs. In a few instances, students would have preferred more in-person learning to facilitate practice-based learning and learning alongside colleagues.

## **Perceptions of EH and TS courses among students**

EH students reported finding their courses interesting and engaging. While the courses varied to some extent in content and teaching style, the CIEH framework and accreditation means that students graduating with EH degrees should have the same level of experience and knowledge as counterparts from other educational institutions.

For many EH students, the variety in their courses was welcomed. This breadth of experience was also seen as important by professional bodies.

**“The advantage of doing [an EH] degree is that you end up with someone who has more holistic understanding of risks, covering health and environmental health issues in food premises.” (Professional or leadership body)**

Despite this, some EH students already had a speciality in mind, and there was some frustration that they had to study a range of specialisations to qualify. Those interested in working within food hygiene and food safety suggested that more specialist courses should be available for those who have already decided what roles they are interested in.

**“Maybe it’s that broadness of it that means that people aren’t as interested, because if you might be interested in one bit, you’ve actually got to go through X, Y and Z just to do that one bit... perhaps if you’re doing the course in your 40s, 50s or whatever, it might be that you do want to specialise and not waste time learning. It is precious when you’ve got kids running around and you’re trying to do your job as well.” (Student)**

Some students found the emphasis on legislation challenging but acknowledged the importance of this knowledge for their future EH career. Students and education providers described the EH courses as mostly theory-based, with more limited practical experience, depending on the course.



**“With legislation as well, I didn't realise there would be so much of that. And, with becoming an EH professional, I feel like you kind of need to know everything about everything, which can feel very overwhelming. It's nearly like information overload.” (Student)**

While practical elements of courses were welcomed, the ability to gain practical experience had sometimes been impeded by the Covid-19 pandemic and the move to remote learning. Students felt that courses would be more informative and prepare them further for their careers if there was more access to practical learning.

**“To be able to gain the theory, in terms of the legislation, which can be quite dry, and not the easiest thing to understand, if you can then see how that is enforced, or looked at in practice, it makes a massive difference to how easy it is to learn.” (Student)**

Students on TS courses had usually joined the apprenticeship route as an opportunity for development and promotion within their LA job roles. For many, completing the course was therefore a way to gain experience and progress in their careers. However, for others, joining the apprenticeship was driven by their LA managers and a need for them to be trained up to deliver more public protection activities.

Some TS apprentices found their studies challenging to complete alongside their day-to-day job roles. There was some frustration among RCO apprenticeship students who perceived course content as not closely linked to their job role. Apprenticeship students felt that the course provided training for activities which they had already carried out in their day-to-day roles, such as how to serve notices. Similarly, they described having to study aspects which did not apply to their current role.

**“It's like you're running after the diploma and the paperwork rather than actually learning something applicable.” (Student)**

**“I haven't found the RCO has provided me with a lot of useful information workwise. It's so repetitive, it's a tick-box exercise.” (Student)**

## **Barriers to entering education pathways**

### **Limited awareness of EH and TS professions**

Many education providers mentioned relatively low numbers of students applying to EH qualifications and courses when compared to other courses at universities. This was the case for both EH and TS qualifications. Education providers felt that limited awareness of EH and TS professions among the public was the primary reason for low uptake of these education pathways. This was seen as a particular barrier to attracting school leavers to the professions.

**“We’re not getting traction [among 16-18-year-olds] as they don’t know about us”  
(Education provider)**

**“I don't think many people set out to be food inspectors. I don't think at school there is a career session on that one.” (Professional or leadership body)**

Reflecting on their experience, LA managers described doing less to promote EH and TS careers in schools over recent years. Financial pressures and insufficient staff were mentioned as barriers to LAs doing more. Some LA managers suggested that the Covid pandemic may have had an impact on career advice services for students across the board, which also may have had an impact on the number of school leavers interested in EH and TS careers. Overall, it was suggested that the promotion of EH and TS careers should be a joint effort between professional bodies and LA regulatory teams, working with others in their LA.

**“In the past we used to do talks at schools to try and tell school leavers what the profession was about, to encourage them to come into the profession. We used to do newsletters for councillors so that we raised awareness of the types of work that we got involved in and what we did. And over the years all of that has just dropped off the agenda because we’ve been, you know, had so many reductions in our service and staffing that those kinds of things are always the first things that fall off the list of jobs that you have time to do.” (LA manager, EH, England)**

**“It's not just the fact they're not telling people there's jobs in Trading Standards and Environmental Health, they're just not telling people about jobs at all, so I think we probably need, collectively, to find alternative routes into youngsters. And I think that is very much a role for our professional bodies, because I don't think we should be doing it locally, I think there should be resources that we can tap into to promote to schools and university students. And I think our, you know, central government agencies have a role to play in that as well, in promoting what value we provide at local level for delivering on their behalf.” (LA manager, EH, England)**

Some education providers described work they had done to engage younger people in the courses, such as attending careers fairs and speaking to school-age children. However, there was a recognition that all those involved in the professions needed to do more to generate interest in the career among young people.

Students also discussed the low visibility of EH and TS professions. Many became aware of EH or TS work as a result of their previous work experience in the hospitality sector or through personal connections to the industry, such as having a family member who works as an EH or in another food role. They often described their friends as not understanding the work they did and felt this lack of awareness was a barrier to others joining the professions.

**“I fell into EH by accident just via temping. I was just temping locally, and the job came up” (Student)**

**“When I was younger, I studied food and nutrition and from that I took a bit of an interest to the food part of things as well. My friend's dad was actually an environmental health officer and told me about the course” (Student)**

## **Challenges faced by students**

Education providers thought that financial costs and the time taken to complete their courses and professional qualifications were likely to be a barrier to some prospective students. They explained that most of their students studying for degrees (i.e., non-apprentices) also have jobs outside of their study to support themselves financially.

Those delivering the TS apprenticeship said that students were employed within LAs and therefore usually had funding to support them through the course. This reliance on LA employment was seen as a potential barrier to other students who are not already employed within LAs, limiting those who could afford to join the course.

**“Regarding food, FSA should support promotion of food specialisations. Getting people qualified. It should be either subsidise through uni or FSA because there are too many challenges for people to get qualified. It costs a lot to get a qualification. Unless you have an incentive to do it, you're not going to do it.” (Education provider)**

## **Post-graduation barriers to LA employment**

Both students and education providers thought that most graduates who wanted to work in LAs were generally able to do so. Those on apprenticeship routes were often retained by their employer after finishing their qualification.

However, education providers called for further support for EH and TS professionals in their early careers. Education providers perceived additional barriers to EH students seeking to complete food or feed specialisms, such as the six-months of required workplace experience and competency requirements to become professionally qualified after leaving education. Education providers wanted more trainee and graduate positions for their students, particularly in EH. This is because non-apprentices graduating from EH qualifications often find LA roles require them to have already completed their EH Practitioner portfolio. Students can therefore face challenges finding a role and employer support to do so. For some students, according to education providers, the lack of opportunity to complete the portfolios in LAs pushes them towards the private sector.

**“The biggest barrier is the FSA putting more barriers for people to graduate as food officers instead of taking extra steps.” (Education provider)**

Education providers were also aware that LAs often do not have the budget and resources to support new graduates through the portfolio process for professional qualifications. Reflecting this, EH LA managers felt that a lot of the responsibility for ensuring recent graduates are able to carry out their job roles now fell to them.

**“Once upon a time you’d go to uni, you’d know your route to qualification, you know that you’d go to LA or business, and you’d have to work through the logbook requirements. Now it’s very much, ‘These are the learning outcomes we want you to have, you go away and find it and come back to us with your portfolio and we expect your sponsor whose based at an LA to be the person that’s saying the work you’re producing is fit for purpose and was going to make you a competent officer when you get to the end of it.’ So a lot of onus has been pushed back onto LAs.”**  
(LA manager, EH, England)

Comparable challenges were also raised by TS managers in LAs. They discussed the time taken to complete professional qualifications following completing the TS apprenticeship and felt this was out of step with other roles paying at a similar level.

**“With TS, what’s happened over many, many years is the chopping and changing of the qualification route... So the actual qualification is a barrier, I think... for our apprentices, they’re not on a vast amount of money... They could probably all turn around and get another job paying more, if they wanted to, with their qualifications.”** (LA manager, TS, England)

Education providers and some LA managers suggested that more students were going to work in the private sector after graduating than had done in the past. This was more of an issue for EH because more private sector opportunities were available to graduates. Education providers thought these roles may be attractive because there is not always a requirement to complete further professional qualifications for private sector roles, and because they offer a better salary than LAs.

**“If you have degree students, they’re going to go off probably to the private sector because it’s easier to get a job because you don’t have to jump through so many hoops to be able to undertake official controls.”** (LA manager, EH, England)

A minority of students said they wanted to go directly into a private sector role. Where this was the case, students typically had previous experience of working in LAs which influenced their outlook or had connections with the private sector previously or through their course.

These students favoured the style of work in the private sector over that of LA roles as the work is perceived to be faster paced than within LA roles.

Education providers and LA managers also perceived that an increasing number of graduates were going straight to the private sector from education. They assumed that

this was motivated by better remuneration, and also pointed to the private sector not having additional professional and competency requirements (beyond completing relevant courses) for staff to be able to perform their roles.

However, most students continued to view LA roles as the preferred first career step, even if they would look to private employment later. For example, many aimed to gain experience, and in the case of food or feed roles, complete their professional qualifications and competencies prior to moving to the private sector. Reasons students are attracted to LA roles are discussed in more detail in Chapter 3.

**“Ideally, I’d love to get a couple of years under my belt and then go out contracting. That’s what, you know, the ultimate goal for me would be but without the experience, you’re pretty stuffed, really, you can’t go anywhere.” (Student)**

### **LA concerns about education pathways**

Some LAs highlighted concerns about the quality of graduates and therefore the training offered by education providers. These LAs felt that the current qualifications do not prepare graduates for LA roles, which means LAs often have to provide further training to ensure officers are competent to carry out food and feed controls. This is covered in more detail in Chapter 3.

Among LA managers who had these concerns, a lack of practical experience was cited as the main issue affecting the quality and type of work early careers staff can perform. This was particularly seen among those who have studied EH courses with more focus on theory. Given the capacity challenges currently facing LAs, the need to further develop qualified staff is putting pressure on already pressurised LA teams. This finding is consistent with students who also cited a lack of practical experience as a barrier.

**“When I speak to students who are undertaking courses – or have done in the last probably 5 or 6 years – it seems that it doesn’t really prepare them for doing the job.” (LA manager, EH, England)**

**“The quality of their knowledge was no more than some that had done an advanced food hygiene course... I’m still trying to train them up to a level where I could feel confident that I would be happy for them to go out and do food work. You know, I’m holding them back because I don’t feel that they’ve got the knowledge and the experience because of the lack of practicality that they didn’t have on that course. Even their grasp of legislation and applying that legislation and just all that experience.” (LA manager, EH, England)**

LA managers who had these concerns wanted education providers to engage with them and ensure qualifications meet their needs. Some LA managers felt it was important for those delivering the courses to have a background and experience in the qualifications

they are teaching. They perceived a lack of recent real-world experience among lecturers was reflected in the lack of relevant knowledge and expertise among recent graduates.

## Opportunities to attract people to education pathways

### Raising the profile of EH and TS professions

In general, professional bodies were thought to have a crucial role in promoting EH and TS professions overall. Although CTSI and CIEH were seen as advocating for EH and TS careers generally, participants suggested that they could be doing more to promote the profile of these careers with school and university students. To support recruitment to food and feed controls, activities to support EH and TS careers should also include a focus on these specialisms.

Education providers and students had limited awareness of what roles professional bodies played in promoting EH and TS professions. However, the examples they were aware of were viewed positively and seen as important for the future of their profession.

**“CIEH have tried to bring back a bit of a promotional campaign about what the profession is, how you get into the profession. But I think, probably, I don't know, if people go out to the likes of careers advice and things like that. So, just being a bit more proactive in letting people know that the job exists in the first place.” (Former LA employee, EH, England)**

**“I don't know what's happened to Trading Standards ... so yes, I think there definitely needs to be some PR on all of these jobs if they really want people to start applying for them.” (LA officer, EH Port Health, England)**

Some education providers and LAs viewed the lack of visibility of the EH and TS professions overall as something that professional bodies could work more with the FSA to address. Students from TS backgrounds also felt the FSA could do more to promote the profession.

Education providers also recognised their role in promoting EH and TS professions by raising the profile of courses to prospective students. They placed particular emphasis on engaging more school leavers. Students also felt that more should be done to promote the courses to both school leavers and career changers. To promote EH courses, students and LAs suggested taking a targeted approach, engaging young people at careers fairs or in schools as well as raising the profile of the profession among the public more generally.

**“If the wider public don't understand, then it's not surprising that young people don't know because it's not something that's known widely, and so it's all about getting that information in at a stage when younger people can make decisions about it.” (Student)**

**“Because we have had difficulties recruiting, it's something that our HR department are looking at, is career fairs and making links with schools. [...] I think it's something that we do need to pick up on because students do not know what environmental health is and I don't think the FSA really encourage that either.” (LA manager, EH, NI)**

## **Raising the profile of food and feed roles in LAs**

Across stakeholders, there was broad consensus that promoting food and feed roles in LAs should be a joint effort between professional bodies (CIEH and CTSI), LAs themselves, education providers, and the FSA.

**“We're just about to embark on some kind of initiative where we're going to go into sixth forms and try and promote environmental health, and do that alongside CIEH, they're called career ambassadors, I think is their term for it, because there's not people coming through.” (Student)**

Across stakeholder groups, there was also an emphasis on LAs and the FSA doing more to promote food and feed roles delivering official controls. In part, this was based on participants arguing that more needed to be done to raise the profile of these specific aspects of EH and TS in response to the recruitment and retention challenges. They found it harder to suggest what this might look like in detail.

**“I think it's a joint responsibility of the LAs themselves, but also the FSA have a role in that... I just think there's quite a lot of work to do in just promoting in general.” (Former LA employee, EH, England)**

**“I said to our managers that we need to go into the schools, we need to go to the colleges, we need to go to the sixth form, and say what we do, why we do it. When I left school, I didn't know this role.” (LA officer, TS, England)**

## **Using apprenticeships to attract more people to relevant education pathways**

Education providers viewed apprenticeships and apprenticeship degrees as a good opportunity to promote the EH and TS profession and provide an accessible qualification. Apprenticeships were viewed as an attractive option as they enable students to be sponsored by their employer while completing their studies.

Likewise, LAs identified apprenticeships as an opportunity to attract and engage a new generation of professionals, which would benefit LAs but also those interested in joining

the profession. From the perspective of LAs, benefits such as the Apprenticeship Levy<sup>3</sup> facilitate the recruitment of apprentices. However, the time and resources required to fully train someone coming through this route was perceived as a barrier for LAs that already face pressures delivering official controls. To support this process, LAs said they wanted more resources to support apprenticeship placements. They also thought that this would lead to more recruitment to food and feed roles, provided the right support was in place for early careers EH and TS professionals.

**“Apprenticeships take a lot of work and resources from local authorities to train them up, but it could be a long-term solution.” (LA manager, EH, England)**

**“We've got the levy and all sorts of benefits. Apprenticeships are not problematic for recruitment from my perspective, but an apprentice takes a 4-year period until they can actually get involved with food work. So, our apprentices are deployed into all other sorts of other activity, EH activity where they actually have a case load, but they cannot do food work because of the qualification requirements.” (LA manager, EH, England)**

**“[FSA] may need to take a more strategic view of the overall funding position for LAs if they really want to change this because as I say throughout, when we say, 'Who wants to come and train through an apprenticeship pathway?' Loads of people are up for that. So the barrier is not the pathway, the barrier is resources.” (LA manager, TS, England)**

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<sup>3</sup> The Apprenticeship Levy was created in 2017. It requires that all employers paying a wage bill of more than £3 million per year must pay 0.5% of their payroll each month as a levy tax. This levy can then be reinvested back into their product in the form of Apprenticeship training.  
<https://educationhub.blog.gov.uk/2023/03/10/how-are-apprenticeships-funded-and-what-is-the-apprenticeship-levy/>



## Chapter 3: Attracting people on relevant education and career pathways to roles specialising in food and feed within LAs

This chapter will discuss the barriers and opportunities around attracting people on relevant education and career pathways to roles specialising in food and feed within LAs. Results from this section are primarily drawn from interviews with LA managers, officers and former employees. Unless specifically mentioned, findings are common across nations and EH and TS professions.

### General perceptions of LA food and feed roles

#### Roles attractive to many students

In line with the results outlined in Chapter 2, people on relevant education pathways were also drawn to careers in LAs motivated by the ethos of public service. However, as discussed in Chapter 2, both EH and TS were considered to have a relatively low profile among the public. Overall, within LAs there was a perception that the pool of potential people who may be attracted to LA food and feed roles was therefore already too small.

**“I think when young ones are picking their choices and choosing their A levels and trying to get into uni, not enough people know about environmental health, that's what I think. You know, I just fell into it by accident. You know, I don't think that there's enough promotion of EH.” (LA manager, EH, NI)**

Once people have decided on a career in EH or TS, participants across stakeholder groups described LA roles as still being attractive for many, particularly for early careers. As discussed in Chapter 2, education providers said that many of their students wanted LA roles to establish themselves in their profession.

On the other hand, LA managers, officers and former employees described significant challenges around offering support to those in the early part of their career, after they had completed their initial qualification. This is considered in more detail below.

#### Professions that offer variety

Participants mentioned that food and feed are relatively small aspects of EH and TS professions. This means that not everyone on relevant education or professional pathways is aware of or interested in focusing solely on food and feed specialisations, even among those who work within LAs.

**“When I first started it was the wider TS, so there's lots of different things that TS officers do. Food and feed is just an example. I originally was interested in TS**

**because I see myself as a public servant, I've wanted to serve my community, basically.” (Former LA employee, TS, England)**

Across stakeholder groups, an interest in public service and a desire to improve public health were seen as the main reasons that motivated people to consider LA food and feed roles. Generally, participants highlighted the relevance of public protection and regulation of food hygiene and standards to people’s everyday lives.

**“I believe in public service. I believe in working with my community. Looking at what my community needs from me and then basically improving the lives of the people that live in my community.” (LA manager, EH, England)**

**“As a team, we have an impact on the health of the county, and not only the county but flying the flag of Welsh food and Welsh produce.” (LA officer, EH, Wales)**

The breadth of both EH and TS professions mean that those on relevant education and career pathways can choose between several specialisms because of personal interest or in response to job opportunities. These choices between different aspects of the professions can also happen at different stages of people’s careers and can impact those already working in LAs in different ways, with food and feed competing with other interests for some people – and with other needs in LA teams covering EH and TS.

This breadth was viewed in different ways by current and former LA employees with experience in food and feed official controls. For some, the opportunity to carry out other tasks, besides food and feed controls, allowed them to keep their job challenging and interesting. However, others found this overwhelming and negatively impacted their workload.

**“There's a lot of pressure, there's a lot of work that needs doing. Some of them as well, also, have been pulled in all directions... I specialised really in food and feed, but sometimes you've got to do food, feed, weights and measures. You've got to do product safety. You've got to do doorstep crime. Sometimes for some people, whilst some embrace that variety, some people find that actually they are being asked to do too many subjects and they can't keep on top of their expertise to be able to do it properly.” (Former LA employee, TS, England)**

## **Reasons people are attracted to LA food and feed roles**

There were several common reasons people on relevant education pathways were attracted to food and feed specialisms and roles in LAs. Some join EH or TS professions already having an interest in food (this was less common for feed). As described in Chapter 2, previous experience of the food industry through other jobs was particularly important in attracting some people to EH qualifications and roles. Others developed an interest in food and feed while studying for their qualifications, either because of the

class-based work, or through practical experience as part of their apprenticeships or placement opportunities.

LA roles were also seen as being the most familiar by students. Many were apprentices with direct experience of working for LAs. Non-apprentices tended to have some contact with those working in LAs during their studies, or through work placements.

As discussed in Chapter 2, students associated benefits with LA job roles, particularly early in their careers. However, LA managers, LA officers and former employees felt that the benefits that LAs were known for offering were not as attractive as in the past. More specifically, there was a perception that the effort to qualify to undertake food and feed official controls often outweighs the benefits that LAs are currently able to provide.

**“The wages aren’t worth it for the amount of training you need to take on. If you’re leaving university, you can see plenty of other options with much better career progression and a quicker rise in pay.” (LA officer, EH, England)**

**“There's other benefits of working in LAs, but again, I think those benefits have diminished over the last 20 years, certainly I've seen, I think, the need to be far more flexible in their approach to work.” (Former LA employee, TS, England)**

## **Professional qualifications and early career progression**

One challenge raised consistently across stakeholder groups was that EH and TS professions have complex education and career progression pathways, particularly following the initial university or apprenticeship qualification. Although resources introducing the relevant education pathways are available online stakeholders mentioned that this information is often confusing and difficult to navigate. This was seen as making it harder to attract people to food and feed roles in LAs. The impact of this on retention will be considered further in Chapter 4 and infographics outlining the qualification pathways to EH and TS careers are detailed in Annex C.

**“I just think that the routes into EH need to be clearer, they need to be more linear, and it needs to be explicit. When you apply for the job or when you go for the course, what it is you need to do and what else you need to do in order to actually qualify, and what that qualification actually means, what being an authorised officer actually means, what being a technical officer actually means. It's very, very muddled and very muddy, and it makes any kind of... career progression or any kind of decision really, really difficult.” (LA officer, EH Port Health, England)**

**“I think the institutions, CTSI have done it as well in terms of overcomplicating and putting in barriers [...] having to do all certain modules before it can get a certain qualification and that doesn't then, you can't actually do anything unless you get that qualification. And so, bringing someone in, with the timeframe to actually get**

**someone competently qualified to do the job, is just beyond the scope. And that's where the problems lie.” (LA manager, TSO, England)**

As well as being seen as complex to navigate, there was also a general perception that professional pathways can be too rigid and onerous. Furthermore, there were also concerns about the changes applied to the current pathways and the lack of clarity around how the range of different qualifications in EH and TS relate to the competency framework requirements for people carrying out official food and feed controls in LAs. This is explored in more detail in Chapter 5.

**“You potentially end up with people who haven't gone through the right routes, and I think that's what the CIEH then started doing was, we suddenly had a shortage, so it's like, 'Oh let's change the process, now you can do your professional qualification at Asda.' Well, how do you work at Asda for 12 months and learn the whole of EH? You can't. They've gone from one extreme to the other. And I think we're now starting to get a few people through that haven't had the right professional experience and background, but the likes of us now as heads of service, do not have the money to be able to offer student placements to show people the correct, right way through local government and to learn the right things. I mean how can private industry like Asda show somebody the full remit of EH?” (LA manager, EHO, England)**

For example, some LA managers mentioned that currently there are several routes for officers to become competent, but not necessarily to the standard required to perform their role. In addition, these routes generally take a few years for officers to complete as they cover a wide range of topics that, in some instances, are not relevant to their roles. Some LA managers suggested that it would be better to simplify requirements and focus on training professionals in specific competencies required to perform their roles.

**“I think what the FSA need to do is, two things, they need to facilitate people to get to a point where they can be competent to do an enforcement role in bite-sized chunks which don't necessarily require people to go off for long periods of time... and the other thing in terms of the existing officer base, the FSA need to reinstate what they used to do which was to provide core training opportunities. As a national regulator they have a national role to facilitate national training standards.” (LA manager, TSO, England)**

**“The fact that we've kind of put TSOs and EHOs on a pedestal and you've got to go through all these qualifications to get to be that person. And actually real life is, we need a variety of people to do a variety of jobs, and we need some people who don't need that top level qualification. We need people who can be specialists in roles, but we also need more generalists and I think there needs to be more flexibility across the board.” (LA manager, TSO, England)**

Some LA officers and managers were also concerned that professional qualifications and the requirements of LA job roles were not always aligned. For example, there was a sense of frustration among some TS professionals in rural LAs regarding the CTSI Weights and Measures module<sup>4</sup>. They believed this had to be completed if they want to study and become recognised as competent in food and feed roles. They suggested that the module was challenging and not directly relevant to their roles.

**“You basically have to do the whole thing [including] Weights and Measures... I know a lot of the smaller authorities don't really see the need for it. And talking to our guys, our apprentices and our trainees, it is one of the things that puts them off. It is that it's perceived as being a scary and really difficult thing to do.”**  
(LA manager, TSO, England)

**“Not a simpler qualification, but more of a flexible qualification. So once you've done one module, you don't have to then do another one unrelated to get the whole qualification.”** (LA officer, TS, England)

Some ways LAs in England have sought to support officers through training and qualifications include internal training provision, supporting EHOs via funding and mentorship to gain professional qualifications. Some LAs have pooled resources across regional LAs to provide EH and TS services.

## **Barriers to attracting people to LA food and feed roles**

### **Lack of suitably qualified staff**

Overall, participants across stakeholder groups highlighted the lack of suitably qualified staff as a key barrier to filling LA food and feed roles. Their view was that more needed to be done to attract people to relevant education pathways to provide a larger pool of people for the professions., This reflects other evidence about the lack of suitably qualified staff (see Annex B- Local Government Association 2022.)

**“I think you need more people in university getting [either] their food safety diplomas or their EH degrees because there's not the numbers there. I think that the FSA need to reverse their thinking back a bit and think, 'How can we get people into education?’”** (LA officer, EH, Wales)

Managers mentioned that LAs often have vacancies that remain unfilled after jobs have been advertised for some time. To fill these gaps, LAs are often using contractors to carry out food and feed controls. This is consistent with findings from the CIEH Workforce

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<sup>4</sup> The Food Law Code of Practice does not have an explicit requirement that individuals have to complete Unit 4 Weights and Measures to be suitably qualified to undertake food controls, so this perception creates a barrier.

Survey report (2021), which shows that 80% of LAs use external agencies to deliver regulatory services and 87% of these do so due to resource shortages.

Although contractors were usually experienced and suitably qualified on paper, there was a perception that they were not as thorough and motivated when delivering official controls. This issue was raised across different types of LAs and in different nations and regions.

**“We have had contractors for feed, and they've been shocking. It would be easier to just do the job myself, because I have to organise them, tell them what you want to do, and then the quality of the work that they have returned has just not been up to par really.” (LA manager, EH, England)**

**“I saw a team of 8 go down to around 3, and then I had contractors effectively. So instead of managing employees who care about the local community, I was managing contractors who were less caring about local communities but were just there, effectively to earn money and deliver food hygiene inspections and health and safety inspections for us.” (LA manager, EH, England)**

Pay was also mentioned as a factor impacting recruitment of both suitably qualified and experienced staff, and early careers staff. LAs managers, education providers and students mentioned that apprenticeships paying the minimum wage were not attractive to some early careers staff. Also, competition across LAs for suitably qualified staff means that LAs with fewer resources and lower salary scales struggle to attract candidates. Candidates are increasingly thought to choose LAs offering better pay and benefits. LA managers also discussed related challenges around retention, which will be covered in Chapter 4.

**“We've recruited I would say for about a year with very little interest in post... the wider discussions particularly within the region suggest that's consistent across the patch.” (LA manager, EH, England)**

### **Lack of experienced officers to mentor new staff**

While students and apprentices were often attracted to LA roles to enable them to establish themselves in their career, other stakeholders described significant barriers to achieving this in practice. The lack of experienced staff to mentor new staff emerged as one of the key issues in ensuring there were enough suitably qualified staff to carry out food and feed official controls now and in the future. Given their limited capacity, LAs described needing to fill vacancies by finding experienced staff. They often preferred to do this rather than hiring new joiners with limited experience who would need mentoring from experienced LA officers.

LA managers said that recruiting apprentices was not generally a concern, particularly among unitary LAs who could offer more variety. LA managers recognised the

importance of supporting and developing those early in their careers, but feel they are not well-equipped to do so.

**“Apprenticeships are not problematic for recruitment... what is problematic for me is going out to try to recruit somebody with experience and qualifications to do food work and when we do that, there is zero interest. My worry is, if you think about the pipeline is that we’re going to get so many people falling out the far end that as the apprentices come on stream, there’s nobody to support or mentor them.” (LA manager, TS, England)**

The general context for LAs was described as challenging. Reflecting the articles listed in the REA (see Annex B), funding was cited as a recruitment barrier among LA managers. Resource constraints, the pressure to deal with backlogs following the Covid-19 pandemic, and difficulties retaining experienced staff have resulted in a difficult environment across the EH and TS professions in LAs.

**“I think we’re reaching a point where the whole viability of developing new entrants into the profession is really compromised because we've lost so much knowledge and experience, it's difficult to expose those new entrants to sufficient practical experience.” (LA manager, TS, England)**

**“We need to be able to train up and give time to less experienced officers, and we just haven't got the capacity to do that because we haven't got enough people to do the job. So, I think that is a difficulty, having experienced people to give time to less experienced officers, as well as obviously funding, in terms of funding posts.” (LA manager, EH, England)**

## **Challenges attracting people back to LA food and feed roles**

Among those who have left LAs, the hands-on aspects of the job and the opportunity to work with the public are potential motivations for them to return. However, the current challenges and pressures facing LAs were generally thought to outweigh the expected benefits of returning. For instance, some former LA employees said that their current roles provide the training, support and career progression opportunities that were not available in their previous LA roles.

**“I probably don't see myself back at an LA. I think, I really enjoy my job now, I enjoy working at [company name]. There's definitely more variety available, there's definitely more career progression available here, just by virtue of being such a big company. I speak to ex-colleagues and just know its not getting any better, budgets are just being squeezed tighter and yet they're wanting more out of them, so it's almost an impossible task really.” (Former LA employee, EH, England)**

# Opportunities to attract people to LA food and feed roles

## Supporting routes to work in LAs

Overall, the findings suggest that many of those on relevant education pathways were interested in careers in LAs delivering food and feed official controls. Across stakeholders involved in education pathways, it was seen as important to support those who want to work in LAs to do so.

Education providers said that many students were employed in LAs after graduating from EH degrees. This was seen as the typical route for EH graduates to gain experience in the sector. Students also often intended to seek employment in LAs once they graduated, if they were not already employed by an LA during their studies. They tended to see employment within LAs as stable, supportive and interesting, which appealed to many starting out in their EH careers.

From the perspective of LAs, having the opportunity for early careers staff to receive training on the job was considered essential for the future of the profession, and something that would attract new recruits. Support to develop as an EH or TS professional focused on food or feed was seen as having motivated existing and former LA employees to pursue their careers. LAs suggested that sponsoring students to take relevant professional qualifications could attract more people to LA roles.

**“I think it would be an incentive for students to want to qualify in environmental health if there was even some sponsorship or some help with getting qualified.” (LA manager, EH, England)**

**“I suppose, actually, thinking about it, there was the feeling that I would be trained and be qualified to do a job, I think that was quite important as well, actually. I think that probably comes back to the fact, what I said to you, that I did my A-Levels but I didn't see a career path for me through university. [...] I thought, there is a job role where they will train me, and I will be qualified to do something. I think that was an appeal as well”. (Former LA employee, TS, England)**

In addition to resources, the other main challenge around offering support was the availability of expertise within LAs. This was linked to retention challenges around experienced staff, who were seen as essential to mentor newly qualified professionals. Being able to support staff through their professional qualifications to demonstrate competencies was seen as particularly important. However, this challenge of keeping hold of experienced staff was generally thought to be very difficult to address. This is discussed further in Chapter 4.



## Chapter 4: Retaining suitably/appropriately qualified and experienced staff within LAs

This chapter discusses the challenges around retaining suitably/appropriately qualified and experienced staff in LAs, drawing on the views of professional bodies and current and former LA employees and managers.

### General perceptions of LA food and feed roles

Overall, experienced staff working in LAs saw their roles as important and felt proud of their contribution to public safety and wider society. The flexibility, regular working hours, variety of work, and working closely with colleagues in LAs helped to support retention. However, the benefits of working for LAs were described as becoming less clearcut, and retention is a significant problem for many LAs.

**“Slowly but surely, over the years, all of those advantages that you had in an LA have either gone or the private sector and other sectors have caught up. So it’s just not as an attractive prospect as it was previously...a lot of it’s down to the resources and the finances that LAs have... I think that is certainly the biggest challenge they’ve got in terms of retaining people.” (Former LA employee, TS, England)**

Pay and benefits were seen as a key retention issue. LA managers and LA officers were concerned that the pay and benefits on offer were not sufficient to retain staff when other alternatives were available. This was exacerbated by the increasing demands on staff and the wider economic pressures for individuals.

**“We can’t offer the salaries that are needed to retain people. We don’t have any good incentives to keep people, you don’t get private healthcare, the pension isn’t what it was, lease cars have gone, lump sums are going. So, you can’t offer any of that.” (LA officer, EH, England)**

**“Salaries and a lack of resource, really... I think this job is not all about the salaries, but obviously with the cost of living, there are pressures on people personally, which means that they’re more likely to be attracted to move for salary increases than perhaps they were 10 years ago.” (Professional or leadership body)**

Beyond pay, challenges around retention differed based on the specific context of the LA and were also different at different stages of EH and TS professionals’ careers. Common themes for both EH and TS professionals included limited support for early careers staff, experienced staff retiring early, a lack of career progression, declining job satisfaction, and increasingly attractive alternative options. Each of these challenges is considered below.

## Barriers to retaining qualified staff

### Early careers

The challenges around supporting early careers staff have already been discussed previously in Chapters 2 and 3. As well as making attracting and recruiting new staff difficult, this was also an issue for retaining early careers staff.

**“Well, I think the problem is that you have a split within the work force. You have people who are very well qualified and have been for a very long time... and then you've got people coming in newly qualified. But there's no resource within the LAs in order to train people up.” (LA officer, EH Port Health, England)**

Concerns were also raised over the lack of support provided to those completing qualifications, including their professional portfolios. Rather than this being something they could do through their day-to-day roles, completing qualifications often felt like taking on an extra responsibility. Participants reported having to complete this work in their lunch breaks, after hours and at the weekends. Some felt this did not reflect what they expected from a career in EH or TS, or did not match the pay, benefits and career opportunities available.

### Later career / retirement

As they reflected on their experience of working as EH or TS professionals, long-standing employees described increasing workloads and challenges brought on by financial constraints over many years. They also discussed the more recent impact of the pandemic. Learning and enforcing the new regulations on top of normal workloads placed added pressure on officers and narrowed the focus of delivering the core aspects of their responsibilities. Participants found it difficult not having the resources to carry out work to previous standards and the way it ‘should be done’.

**"We all very much inherited the Covid role of being the Enforcement Officer. Well, there was no qualification for that, but we were expected to serve notices on legislation ... and that put a whole new pressure on everyone, and quite frankly was enough to make ... quite a lot of people leave the profession." (LA officer, EH, England)**

Some experienced officers who are able to access their pensions, are considering or taking early retirement as a result of these pressures. Overall, participants across stakeholder groups understood why individuals would make the choice to retire as soon as they could, even though this was causing a resource issue when it came to the delivery of official controls.

These findings compare with other studies suggesting that a reduction in funding has a negative impact on retention in LAs (see Annex B). For instance, Assan (2019) claims

that a lack of funding has had multiple effects on LAs, including the reduction of staffing levels through offering early retirement to senior EH professionals and reducing their recruitment to below a replacement ratio, while maintaining the same workload targets.

**“We've prioritised and reprioritised and lots of things have fallen off the bottom and we're firefighting now, and that's very wearing... when it gets towards the end, people are retiring or going off earlier, because they can and they've had enough. I'm not sure what anyone can do about that.” (Professional or leadership body)**

There were also consistent concerns about the skills gaps that result from experienced staff retiring. The ongoing pressures on EH and TS professionals, combined with experienced people retiring mean there is a lack of knowledge transfer, and the problems this has created are expected to get worse. This has left participants worried about how early careers professionals will learn the necessary skills to carry out their roles effectively.

**“LAs have had such a long time where they haven't invested in training, there's a big gap. There's quite a lot of officers who are in their 50s and who are all, obviously, looking to retire. There is quite a big gap, so some of the more younger ones, it's where do they get their experience from? How can they be supported?” (Former LA employee, TS, England)**

Some rural LAs were particularly concerned about their workforce reaching retirement age. Their more remote geography means they have tended to retain staff for longer, as there are fewer options for experienced EH and TS professionals locally. They also struggle to attract people to the area, particularly younger people at the early stages of their careers. This raises concerns about the future of regulatory teams and for the next generation of LA officers delivering official controls.

## **Career progression**

A lack of career progression opportunities was highlighted as a key challenge to retaining suitably qualified EH and TS professionals. Much of this was thought to be a result of financial constraints over recent years. Participants described how budget cuts had caused LAs to reduce headcount at different levels to save money.

**“In some LAs, you might have a Technical Officer, EHO, Senior EHO, Principle EHO, but some LAs, because of finances, it's just levelled everyone. So, all you have is officers, doesn't matter where you're coming from, and team leader.” (LA officer, EH, England)**

This has resulted in an increasingly flat structure in some LAs, which has made it significantly more challenging for staff to progress. In turn, this can demoralise highly experienced staff. For example, some LA officers at the top of their pay band described feeling stuck and frustrated, with very limited opportunities to take on more responsibility.

Others who had left LA roles cited a lack of progression as a key reason for their decision.

**“Once you are an EHO, you don't go anywhere. You stay on the same salary, unless you get a senior or principal job. So, basically, when you start, you stay on that salary for the rest of your life until you find a promotion. So, you're basically waiting on somebody to retire, you know, until you get a promotion and that's a fact. Most of the officers here are on that salary for the rest of their life. There are no promotion opportunities.” (LA manager, EH, NI)**

Any progression opportunities that were available were mostly managerial positions leading teams. However, these are commonly filled by long-standing officers who stay until they retire, and therefore do not come up often within an individual LA. Some participants also said that they liked being on the frontline and wanted opportunities to progress based on their technical expertise or specialism. Managerial positions were viewed as taking qualified people out of frontline work, creating more gaps in teams when it comes to delivery.

**“[It's] fairly classic when you're making cuts in a department, you remove those middle management roles, but of course that makes it very hard to progress because the leap into the next role is much bigger. So, yes, I would have said for my role, there is progression, I could progress into a team leader role which would be a more management role... which not everybody is interested in.” (LA officer, EH Port Health, England)**

**“I personally had got to the point where... the next step for me would have been a Head of Service, and it wasn't something I aspired to. Which, actually now we talk about it, maybe actually one of the reasons perhaps I did move on, because I didn't see myself advancing in my career within the LA.” (Former LA employee, TS, England)**

The lack of obvious career progression opportunities means it is common to see suitably/appropriately qualified staff moving sideways – transferring to other teams within their LA, to a similar role in another LA, or taking secondments. Officers being recruited by other LAs that offer them more money for a similar role has become increasingly common, particularly with the current cost of living crisis. However, for those with families and other local ties, relocation, and therefore progression, may not be an option. LAs covering larger geographies, including some county councils, perceived their geography to be a barrier to a sidestep move.

**“County councils are geographically bigger areas, usually. There wasn't very much movement between authorities at that level because you physically would probably have to move house. If you were, for example, working in a London borough or some of the metropolitan boroughs, places around Birmingham and Manchester,**

**it's easier because you can still live where you are and still go and work in another LA.” (Former LA employee, TS, England)**

There was also a perception that career progression was generally more difficult in rural LAs. In smaller LAs, in particular, participants said there was no way to progress while remaining in a similar role.

## **Job satisfaction**

Although some aspects of LA roles in EH and TS are considered attractive by students and early careers staff (as discussed in Chapters 2 and 3), those who have worked in LAs for longer described how their roles have become harder. These more experienced LA officers and managers felt that careers in LAs were not viewed in the same way by those doing them, with fewer resources, benefits and long-term pressure having a detrimental impact on staff. Often this was described in terms of frustration around not being able to perform their roles properly, which was described as causing increasing numbers of officers to look for other roles. This is also consistent with findings from the CIEH Workforce Survey report (2021).

**“It seems to me that certainly since austerity, there is a sense that there is less prestige [associated with] working in local government and... you feel like you're not doing enough/more needs to be done... because of a lack of resources.” (Professional or leadership body)**

**“We are all passionate about our job and we want to do it quality and we want to do it well and you are getting to the point where you have to prioritise and get to the point where it's good enough – I've done it [so] there isn't going to be a public risk but I would have liked to have gone that step further for my own personal professional enjoyment. I think that can be an issue.” (LA manager, EH, England)**

Participants with experience of working in LAs described how added pressures over the past few years had further reduced morale and job satisfaction. Both Covid-19 and Brexit have had significant impacts. Learning and enforcing new regulations on top of existing workloads has placed additional pressures on LAs and they are still trying to catch up.

**“We were given all the Covid regulations to deal with and trying to tick over with all the new food businesses that were set up in lockdown. Everyone got inundated with them. And obviously our normal work didn't happen, so we're still all battling back from that.” (LA officer, EH, England)**

**“I would say, bearing in mind the amount of new legislation that we've had coming in, all the changes for Brexit. I don't think we've had, perhaps, enough of the right style of training to make us as competent as we could be or would like to be.” (LA officer, TS, England)**

LA staff and managers from coastal authorities and those working in Port Health described particular challenges and pressures associated with Brexit. They highlighted how they were either taken out of their teams, creating a backlog of other work, or had to do extra import/export and regulation work on top of their normal tasks.

**“Port Health recently went through a massive recruitment phase in order to cover import checks since we left the EU, and then cut funding by 75% and a lot of my colleagues were made redundant. (LA officer, EH Port Health, England)**

Participants linked the workload pressures and low job satisfaction to a lack of suitably qualified staff to deliver core role requirements, including food and feed official controls. They described this as requiring some LA staff to take on more work or additional responsibilities, but without always receiving the expected recognition for doing so.

**“So now I’m lead officer... I mean, it sounds very glamorous, but it doesn’t actually come with any benefits. You don’t get, like, a pay rise for being the lead officer. You don’t even get time off to focus on the lead officer job, you’ve just got to fit it in with everything else.” (LA officer, TS, England)**

LA officers also described having to carry out more challenging inspections and other stressful tasks. These pressures were seen as not only eroding job satisfaction but having tangible effects on individuals. Some current and former LA employees reflected on this, with similar issues across EH and TS professions.

**“Resources were just getting cut and cut all the time, less and less opportunities to do things. You felt, often, that you were firefighting. You were just getting the job done and it was almost a bit, you weren’t able to go and get any depth in some of the things that you wanted to.” (Former LA employee, TS, England)**

## **LA staff moving to private sector and other public sector roles**

The challenges outlined in this chapter are making alternative opportunities in the private sector and other public sector organisations increasingly attractive to LA staff delivering food and feed official controls. Although many of those working in LAs still enjoy their work and see it as valuable, the pressures described above were seen as outweighing the benefits for many. This means many said they were looking for similar roles that contribute to public health and safety elsewhere.

**“We’ve got a very devoted team of dedicated officers who just want to do a good job. Unfortunately, there isn’t always the platform available for us to do a good job. We haven’t got enough people, we haven’t got enough resources, we haven’t got**

**enough time, we haven't got enough training. So, you know, people go contracting because you can get so much more money.” (LA officer, TS, England)**

## **Opportunities to retain qualified staff**

Overall, participants struggled to suggest ways to address retention challenges given their understanding of the difficult context LAs currently face. The barriers they identified were seen as considerable and would require significant change to tackle. Even so, addressing these barriers was seen as crucial for the future of EH and TS professions. While it was hard for individuals to identify how best to do this, there were some specific suggestions for changes that may help individual LAs retain staff for longer.

### **Changes to pay and conditions**

Some LA officers and managers suggested that increased pay was needed to retain staff. They felt the current pay was not in line with the expertise and qualifications of staff, and that this was an important way to address workforce challenges.

Linked to this, some discussed how to address the movement of EH and TS professionals between different LAs based on relatively small increases in pay to perform similar roles. To address this, some participants suggested removing pay disparities between LAs and having more consistency across the profession.

**“I think all the councils should be upped to the same pay that we're on. And I think that would help retain staff too.” (LA officer, EH, NI)**

Current and recent LA employees suggested other benefits such as more flexible working as an opportunity to improve retention. While many LAs felt they had good flexibility, others thought this could be improved. Some LAs expressed how resource pressures meant they often were unable to work as flexibly as they would like. For example, one LA in Northern Ireland highlighted how hybrid working was not an option in their team. Given the workforce profile, many EH and TS professionals described having caring commitments, and thought more flexible working might encourage them to continue working in LA roles.

**“It's tough, isn't it? Other than, you know, salary increases because I think, unfortunately, money talks, for that. Or it's some way finding some other benefits that the LAs can provide that no one else can... so whether it's more opportunities for more flexible working, implementation of 4-day working weeks but without affecting the salary, those type of things.” (Former LA employee, TS, England)**

### **Valuing EH and TS within LAs**

There was a perception that the importance of EH and TS was often not recognised within LAs. Some cited that this was also reflected in the resources and budgets allocated to EH and TS regulatory teams. Finding ways to make EH and TS

professionals feel more valued was seen by some as another opportunity to help retain staff.

**“It's that value thing as well, I think people don't feel valued anymore in the role, and that takes a strain as well. So, I think it's people recognising how important the career is...” (Former LA employee, EH, England)**

## **Developing new ways of working**

In response to the existing recruitment and resourcing challenges LAs are facing, some LAs said they have implemented new ways of working through collaborative service strategies. This was seen as being more realistic about the challenges around recruitment and retention and taking steps to ensure services could continue to be delivered effectively in the challenging context.

For instance, LAs that are facing capacity and recruitment challenges and struggling to meet their targets have seen in shared services an opportunity to share expertise and improve delivery without placing all the burden on individual LA teams.

**“We established the shared service because of the resilience issue. There was a cohort of EHOs who were in their late 50s, 60s and all going to retire at once. So, the Chief Execs decided that it would be a good thing to put us together.” (LA manager, EH, England)**



## 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 LAs.

**“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)**

## Chapter 6: Recommendations for future focus

This Phase 1 research focused on discovery, aiming to support a more holistic understanding of barriers and facilitators to the recruitment and retention of suitably and appropriately qualified and experienced officers across EH and TS career pathways. The issues raised in this research are wide-reaching and are not all within the scope of the FSA's role and remit.

In Phase 2, the FSA will assess the findings and recommendations from participants to:

1. Identify which findings are for the FSA to address in its role as the Central Competent Authority. The FSA will then review any associated recommendations from interviewees and assess the cost and deliverability of these to take forward a project which will tackle the issues identified.
2. Act as a convenor and collaborator to bring stakeholders together to assess the findings and recommendations that do not sit within the FSA's remit and to encourage collaborative working that seeks to address these issues.
3. Identify which findings the FSA has no remit to change and make clear where these will not be taken forward.

### 1. Considering the wider ecosystem of regulated controls

The research has found that competing pressures within LA can contribute to a lack of allocated resources for official food and feed controls. The REA has found that LA services are having to adapt to resource constraints (Plume, 2018; SDPPW, 2021). To address this, participants suggested:

- **Greater engagement with other government departments and regulatory bodies** to support the resourcing of regulatory controls / official controls as a whole.
- Consideration of the extent that LAs are requiring **officers competent in food standards delivery to undertake additional training** to deliver food hygiene controls and the nature of the training delivered.
- **Promoting EH/TS careers and food and feed roles** in LAs.

The lack of awareness of EH and TS careers and food and feed roles in LAs was a consistent theme across stakeholder groups. To address this, participants suggested:

- **Promotion of EH and TS careers in schools and universities.** This was seen as a joint effort between professional bodies, education providers, LA regulatory teams, and the FSA.

- **Promotion of food and feed careers in LAs** to be led by the FSA and LA regulatory teams.
- **Collaboration across FSA and government department with regulatory responsibilities, including the LGA**, to ensure that the system of official controls as a whole is sustainable, regardless of specialism.
- **Collaboration across FSA and relevant education providers** to support promotion and access of students to relevant courses, and capture statistics on current and prospective students.

## 2. Leveraging existing experience in food

This research identified that previous experience in the food industry was a key driver for people joining the career pathway. This was also seen as an opportunity to:

- **Attract people from the food industry into food and feed roles within LAs** through promotional work targeting those who are looking for a career change.
- **Support students who have an interest in food and previous experience in the food industry** to consider a career in food and feed roles in LAs.

## 3. Supporting apprenticeships

Apprenticeships and apprenticeship degrees were perceived as a valuable way to address recruitment issues raised by stakeholders. Apprenticeships were viewed as an attractive option both for students and LAs, and benefits such as the Apprenticeship Levy was considered as a facilitator. However, the time and resources required to fully train an individual coming through this route was perceived as a barrier. In this context, stakeholders identified a need to:

- **Position apprenticeships as a way to attract more people into relevant LA roles** and engage a new generation of professionals.
- **Support trainees coming through an apprenticeship pathway.** To achieve this, LA managers suggest that the FSA needs to take a more strategic view of the overall funding position to ensure there are sufficient resources within LAs to support apprentices.

## 4. Flexible qualification routes

An important finding from this research was that stakeholders find the current qualification routes complex to navigate. These were also perceived as too rigid and onerous given the jobs they lead to, which was seen as a deterrent for people to complete them. Given the need to attract more people into relevant education pathways, stakeholders put forward recommendations to:

- **Simplify the education requirements and focus on training staff in specific competencies required to perform their roles.** For instance, it was suggested

that qualifications should be offered by modules focusing on specific competencies which do not require people to invest a lot of time to get qualified.

- **Promote high quality CPD opportunities as a way to address competency gaps.** LA managers believed this should be championed by the FSA as part of their role as a national regulator.
- **Work with professional bodies and LA regulatory stakeholders** to ensure that individuals in the EH / TS pathways have a clear understanding of routes to qualification and progression through these careers.

## 5. Enhancing support and opportunities for early careers staff

A challenge raised by stakeholders was a perceived lack of support provided to early careers staff. This was seen as largely driven by insufficient resources and exacerbated by the lack of experienced officers to mentor new joiners. To ensure that early careers staff are better supported, stakeholders suggest to:

- **Provide training on the job.** From the perspective of LAs, having this opportunity was considered essential for the future of the profession, and a provision that would attract new recruits.
- **Provide financial support to students, particularly regarding food and feed specialisation.** Stakeholders suggested that sponsoring students to take relevant professional qualifications could attract more people to LA roles. Some stakeholders suggest that the FSA should subsidise these qualifications.
- **Offer more trainee and graduate positions for students in LAs.** This recommendation was raised by Education providers.
- **Support the completion of food and feed specialisms.** This includes facilitating the completion of their portfolio and workplace experience requirement.

## 6. FSA's Competency Framework

This research identified challenges around understanding and using the FSA's Competency Framework, and particularly making judgments about whether current or potential staff are appropriately qualified to deliver official food and feed controls. Further research may be required to explore existing barriers and identify opportunities to improve how the Competency Framework works in practice. Other steps could include to:

- **Explore LA workforce understanding of the Competency Framework** and develop, through engagement with LAs, a more specific understanding of the barriers faced in practical implementation when authorising LA and contracted staff.
- Making the Competency Framework more **useable and accessible.**
- Consider **working with the CIEH and CTSI** to map the FSA Competency Framework against their professional frameworks to make it easier to use.
- Consider **working with education providers** to map "suitable" and "appropriate" qualifications to the Framework.

- Consider **using the Competency Framework to map a pathway through the professions.**
- **Map the FSA training offer to the Competency Framework** and consider doing the same with other partner training providers.
- **Regularly engage with LAs** to ensure that the requirements of the Competency Framework are clearly understood and that it responds to their needs.
- **Providing training** and consistency exercises for Lead Officers assessing competence.

## 7. Pay and job conditions

Some LA officers and managers raised pay and job conditions as a key challenge facing LAs. Given that this was an important element to address retention challenges, LAs officers and managers suggested:

- **Remove pay disparities between LAs and having more consistency across the profession.** This would support retention in individual LA teams.
- **Ensure pay is in line with the expertise and qualifications of staff.**
- **Ensure flexible work conditions.** This include allowing staff to work flexibly and remotely without having an impact on pay.

## 8. Value EH/TS professionals

This research also highlighted a need for LAs to value and support their regulatory workforce. LA managers, officers and former employees mentioned that there is a need to acknowledge the important work officers do to ensure public health and safety. The development of strategies to celebrate and value the achievements of the existing workforce could be the first step in this direction.

## Annex A: Final sample of participants included in the research

Below is the final sample achieved across stakeholder groups. Following is a breakdown of each stakeholder group sample.

Stakeholder	Number of participants
LA managers	42
LA officers	29
Former LA employees	10
Professional bodies	7
Education providers	11
Students	36
<b>Total</b>	<b>135</b>

Breakdown of each stakeholder sample:

		LA Managers				Totals
		Two tier		Single tier		
		District	County	London Borough & Metropolitan	Unitary authorities or districts	
England	North East			1		38
	North West	1	1			
	Yorkshire	2	1	2	2	
	West Midlands	1				
	East Midlands	6	1			
	South East	5	3		3	
	East	1	3			
	London			2		
	South West	1			2	
Northern Ireland					4	4
Wales		<i>No participants in the research</i>				0
<b>Totals</b>		17	9	5	11	<b>42</b>



		LA officers				
		Two tier		Single tier		
		District	County	London Borough & Metropolitan	Unitary authorities or districts	
England	North East					24
	North West					
	Yorkshire	2		1		
	West Midlands			2	2	
	East Midlands	1	1		2	
	South East	2	1			
	East	4	1		1	
	London			2		
	South West				2	
Northern Ireland					2	2
Wales					3	3
<b>Totals</b>		<b>9</b>	<b>3</b>	<b>5</b>	<b>12</b>	<b>29</b>

Former LA employees		
New employer	FSA	3
	Other	7
<b>Totals</b>		<b>10</b>

Professional bodies		
Specialism	EH	2
	TS	4
	Other	1
<b>Totals</b>		<b>7</b>

		Education providers		Students	
		University	Training provider	University	Training provider
England	North East				
	North West	1		4	
	Yorkshire	1		5	
	West Midlands	3	1	4	8
	East Midlands	1			
	South East				
	East				
	London	1			
	South West	2		10	
Northern Ireland				1	
Wales		1		4	
<b>Totals</b>		<b>11</b>		<b>36</b>	

Note: region is where the University or training provider is based, not the home location of the participants (representing education providers or taking part as students).

## Annex B: Rapid Evidence Assessment (REA)

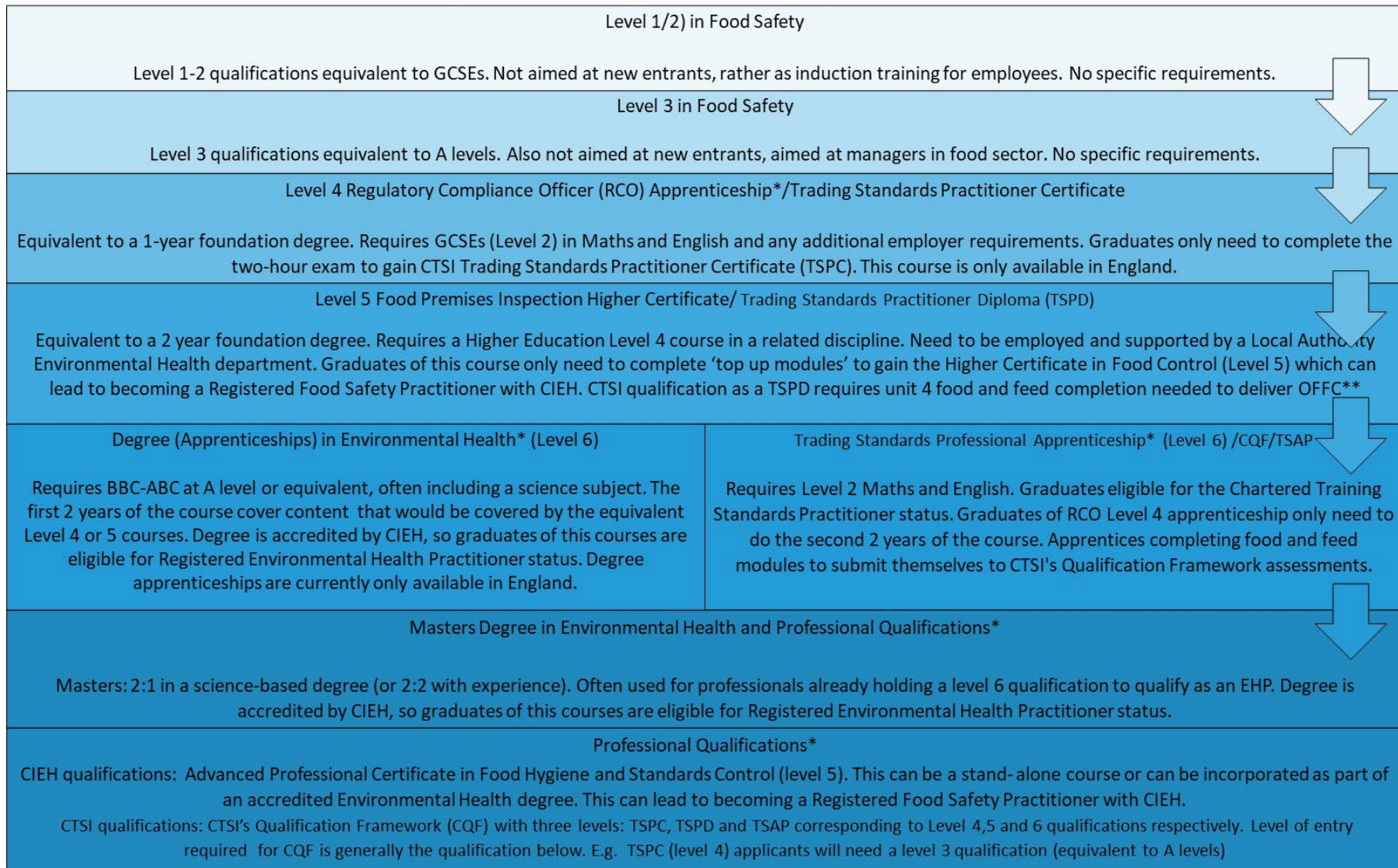
Results from the REA are provided under a separate cover. The full list of literature reviewed is outlined below:

- Atkins, G. and Hoddinott, S. 2020. Local Government Funding in England. Institute for Government. Available at: <https://www.instituteforgovernment.org.uk/explainer/local-government-funding-england>. Accessed 13:03 09/03/2023.
- Assan, N. 2019. The challenges of food law enforcement: perceptions of environmental health practitioners in the Northwest of England. University of Salford. Available at: <https://usir.salford.ac.uk/id/eprint/51722/> . Accessed online at 13/03/2023.
- Chartered Institute of Environmental Health (CIEH). 2021. Environmental health workforce survey report: local authorities in England. Chartered Institute of Environmental Health. [online] <https://www.cieh.org/media/5249/cieh-workforce-survey-report-for-england.pdf>
- Chartered Trading Standards Institute (CTSI). 2019. Workforce Survey 2018-19: Trading Standards Services Statistical Analysis of Changes and the Current Views from Heads of Service. Chartered Trading Standards Institute. [online] <https://www.tradingstandards.uk/media/documents/news--policy/surveys/final-ctsi-workforce-survey-2018-19.pdf>
- Plume, R., Page, A. and Garelick, H. 2018. Responding to the risk of reducing resources: Development of a framework for future change programmes in Environmental Health Services. International journal of disaster risk reduction, 31, pp.30-36. <https://doi.org/10.1016/j.ijdrr.2018.04.013> Accessed 03/04/2023
- Building for the Future – A Report by Public Protection Wales (Currently unpublished)
- Savage, S.P. 2018. Business Service Plan of the City of Newcastle Upon Tyne's Trading Standards Service. Newcastle-upon-Tyne Available at: <https://www.newcastle.gov.uk/sites/default/files/2019-08/NETSA%20Strategy%202018-2020%20September%202019.pdf>. Accessed 03/04/2023
- Herriot, C. 2022. Business Service Plan of the City of Newcastle Upon Tyne's Trading Standards Service. Newcastle-upon-Tyne Available at: <https://www.newcastle.gov.uk/sites/default/files/2022-04/Business%20Service%20Plan%202022-2023.pdf> Accessed 03/04/2023
- Local Government Association. 2022 Public protection services: councillor handbook | Local Government Association. [online] Available at: <https://www.local.gov.uk/publications/public-protection-services-councillor-handbook> .

## Annex C: Infographics of qualification pathways

The infographics on the following slides present the training and career pathways for the Environmental Health (EH) and Trading Standards (TS) sectors. Any irregularities relating to wages are as a result of a 'single point in time' sample of available job vacancies with wages varying by location. As such the sample may not be representative of the wages of current employees within the sector. The first infographic details the qualification route for Trading Standards and Environmental Health professionals. The following two infographics contain the Environmental Health and Trading Standards career routes respectively. The qualifications that feature in the top 2 levels of both of these infographics are examples of the typical qualification route that could be taken prior to entering the sector. Alternative routes are possible and will feature the apprenticeships and professional courses detailed on the first infographic.

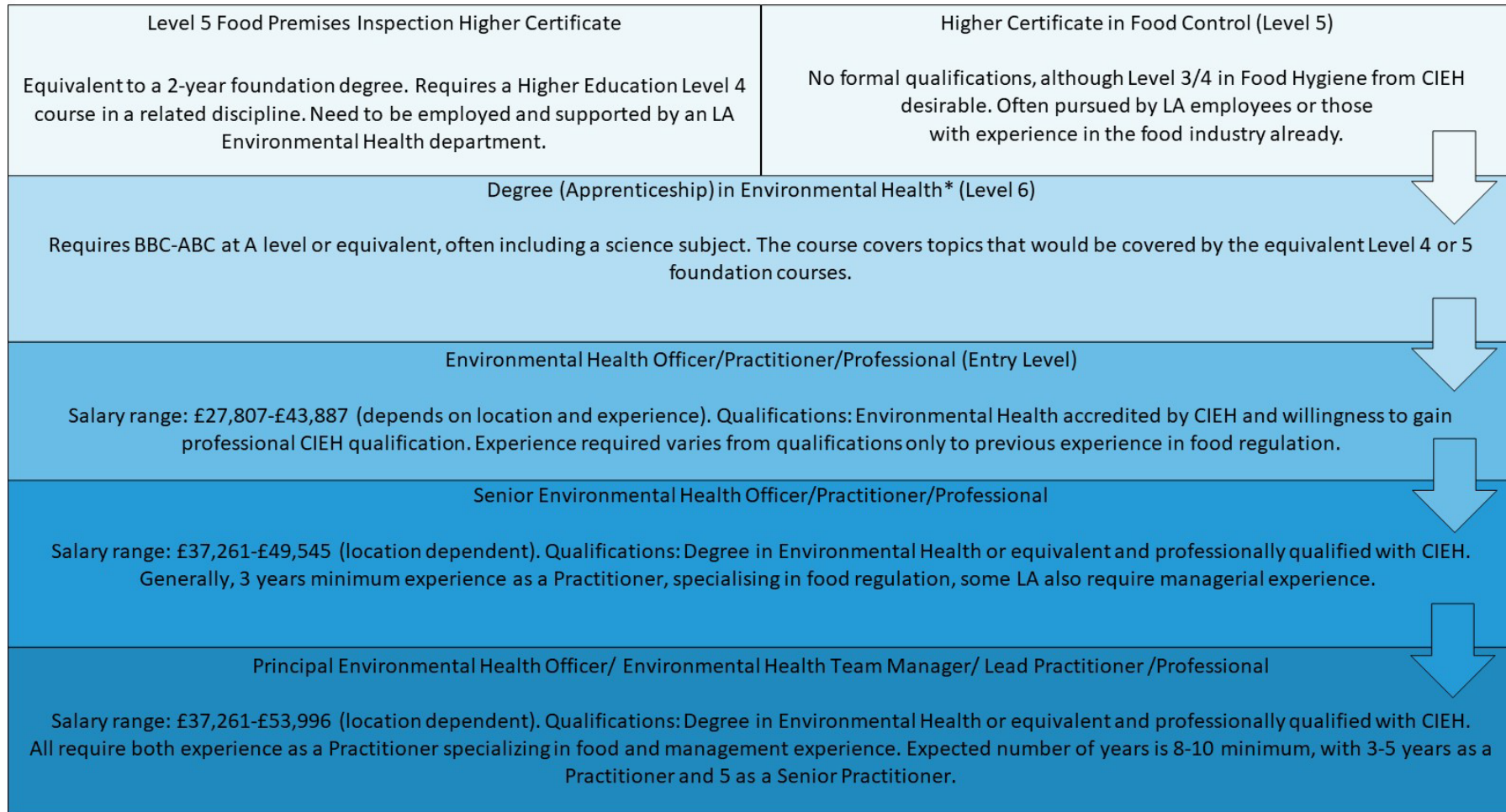
# Qualification Pathway to Trading Standards/ Environmental Health Career



\*These courses are not specific to food and feed regulation. Trading Standards and Environmental Health professionals regulate areas such as housing, health and safety, product safety and many others. Graduates of these courses can specialise in these sectors instead of food and feed regulation if they choose to.

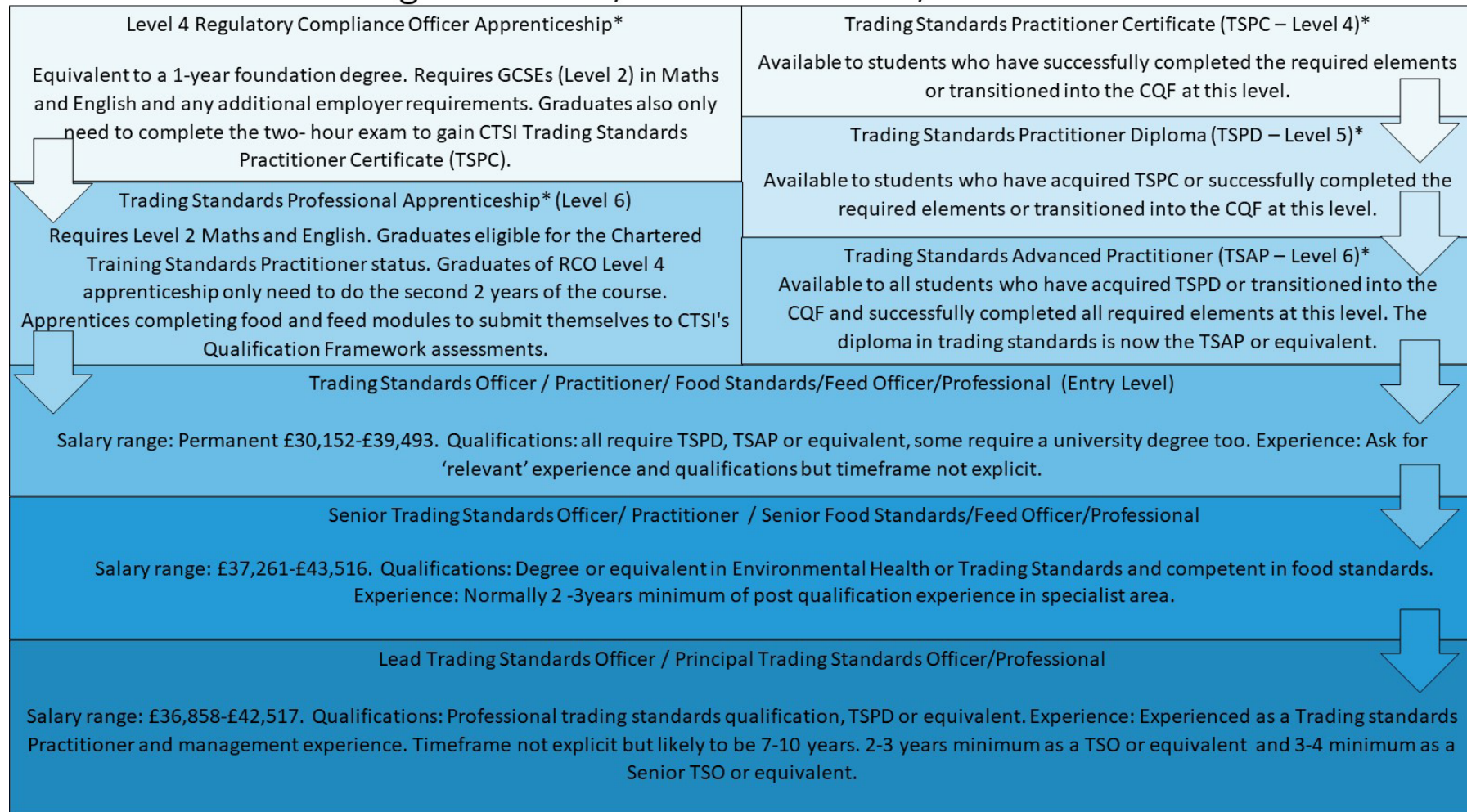
\*\*Official food and feed controls

## Environmental Health Job Roles – Food and Feed



N.B. Environmental Health Officers/Practitioners also regulate sectors such as housing, environmental pollution & H&S. They may specialise in food, be a general Environmental Health Officer/Practitioner or specialise in another discipline. Delivery of food and feed official controls are only one aspect of the role.

## Trading Standards / Food Standards/Feed Job Roles



\*N.B. Like Environmental Health, food and feed regulation is only a part of Trading Standards' remit. TSOs/ Food standards/Feed officers may specialise in food/feed or specialise in another area as well.

# Annex D: LAs EH and TS Roles and Responsibilities

## Local government structure and responsibilities

- England – 333 local authorities
  - Type 1 – Upper tier- county councils (24)
  - Type 2 – Lower tier- district / borough councils (181)
  - Type 3 – Single tier (128)
- Wales – 22 local authorities (all single tier)
- Northern Ireland – 11 local authorities (all single tier)

		Food safety (Environmental Health)	Food Standards and Animal Feed (Trading Standards)
Two tier areas (England)	County (upper) <b>24</b>	✘	✔
	District / borough (lower) <b>181</b>	✔	✘
Single tier areas	<u>England</u>	✔	✔
	London boroughs <b>33</b>		
	Metropolitan boroughs <b>36</b>		
	Unitary authorities <b>59</b>		
<u>Northern Ireland</u>			
Unitary “districts” <b>11</b>			
<u>Wales</u>			
Unitary authorities <b>22</b>			

## Roles and Responsibilities (as related to delivery of Official Controls)

	Role	Responsibilities (as related to delivery of Official Controls)
<b>Food Hygiene (Environmental Health Officers) *</b>	<p>Environmental health officers are responsible for monitoring and enforcing health and hygiene legislation. They also investigate when there's an incident, such as pollution, a noise/odour problem, toxic contamination, pest infestation or an outbreak of food poisoning.</p> <p>There are five disciplines of EH: environmental protection, food safety and integrity, health and safety, housing and community and public health.</p> <p><b>Duties could include:</b></p> <ul style="list-style-type: none"> <li>• inspect businesses for health and safety, food hygiene and food standards,</li> <li>• follow up complaints and investigate outbreaks of food poisoning, infectious disease notifications or pest infestations.</li> <li>• collect samples for laboratory testing.</li> <li>• enforce environmental health laws.</li> <li>• investigate accidents at work.</li> <li>• advise community groups and give educational talks.</li> <li>• give evidence in court.</li> <li>• write records and reports.</li> </ul>	<p>Delivery of official food hygiene controls is, for the most part, through local authority environmental health services in England, Wales and Northern Ireland. In England, food hygiene controls are undertaken by District Councils, London Boroughs, Metropolitan Borough Councils and Unitary Authorities. All 22 local authorities in Wales and the 11 district councils in Northern Ireland undertake hygiene controls.</p> <p>Delivery responsibility across the system, including at the local authority level are outlined in the table below 'Responsibilities: Table 1'.</p>



	<ul style="list-style-type: none"> <li>advise employers on all environmental health matters</li> </ul>	
<b>Food Standards (Trading Standards Officers) *</b>	<p>TS professionals act in the interest of consumers and legitimate businesses. They advise on and enforce laws that govern the way we buy, sell, rent and hire goods and services.</p> <p>TS professionals work for LAs in England &amp; Wales, advising on consumer &amp; trading law (Regulatory areas outlined below), investigating complaints, conducting test purchasing &amp; sampling, undertaking inspections and investigations. They provide community groups with advice and give educational talks. They have a range of enforcement tools, from providing business guidance, through to undertaking prosecutions to secure compliance. They enforce a wide range of legislation, which cover all types of businesses, in the following main regulatory areas:</p> <ul style="list-style-type: none"> <li>food standards – composition and labelling, food fraud.</li> <li>animal feed</li> <li>agriculture</li> <li>consumer &amp; product safety</li> </ul>	<p>Delivery of official controls is, for the most part, through LAs in England, Wales and Northern Ireland. In England and Wales, the work is generally undertaken by TS services (although EH services also undertake this work). In Northern Ireland it is undertaken by EH services.</p> <p>Food standard controls, where appropriate, are conducted by LAs in premises where the FSA have jurisdiction, for example an FSA-approved meat premises producing meat products which have compositional and labelling requirements.</p> <p>In England, standards controls are undertaken by county councils, London boroughs, metropolitan borough councils and unitary authorities. All 22 LAs in Wales and the 11 district councils in Northern Ireland undertake standards controls.</p> <p>Delivery activities across the system, including at the LA level are outlined in the table below ‘Responsibilities: Table 2’.</p>

	<ul style="list-style-type: none"> <li>• intellectual property</li> <li>• fair trading – pricing, descriptions, hallmarking, doorstep crime, scams, banned practices.</li> <li>• product labelling</li> <li>• weights and measures</li> <li>• under-age sales</li> <li>• animal health and welfare</li> <li>• overloaded vehicles</li> <li>• civil law and advice</li> <li>• fireworks &amp; petroleum licensing.</li> <li>• Some TS jobs involve enforcing all aspects of TS work; some specialise in one area.</li> </ul>	
<b>Feed (Trading Standards Officers) *</b>	See above	<p>In England and Wales, delivery of official controls is, for the most part, through LAs (TS services).</p> <p>This includes registration and, where appropriate, approval of feed establishments (prior approval is needed for feed establishments which carry out certain high-risk activities such as the manufacture of feed additives and premixes, or the processing or blending of certain oils and fats). It also includes inspection and sampling work which is</p>

		<p>coordinated regionally through nine regions in England and six in Wales.</p> <p>The exceptions include the registration/approval of feed businesses that mix medicated feed and controls that relate to medicated feed, specified feed additives. These controls are undertaken by Defra's Veterinary Medicines Directorate (VMD).</p> <p>VMD is also responsible for monitoring veterinary medicine residues in feed and the Health and Safety Executive (HSE), through its Chemical Regulation Division (CRD), undertakes pesticide residue monitoring.</p> <p>Controls that relate to the animal protein in feed ban are undertaken by Defra's Animal and Plant Health Agency (APHA).</p> <p>In Northern Ireland, all official feed controls are undertaken by DAERA's Agri-food Inspection Branch. Monitoring of pesticide residues is currently being delegated to HSE CRD.</p> <p>Policy responsibility is held centrally and divided between the FSA, Defra, Welsh Government (WG) and DAERA – delivery of official controls are outlined in the table below 'Responsibilities: Table 3'.</p>
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*\*Ipsos' work will focus on the areas where LA's hold the responsibility for the delivery of official controls. Additional information is provided below to give an overall picture of the official controls delivery system.*

## Responsibility for food hygiene and meat safety delivery of official controls

**Responsibilities: Table 1**

Area	England	Wales	Northern Ireland
Welfare at slaughter and transport	FSA (slaughter) & LAs (transport)	FSA & LAs	DAERA
Bovine Spongiform Encephalopathy (BSE) controls	FSA	FSA	DAERA
Specified Risk Material (SRM) and other animal by-products	FSA	FSA	DAERA
TSE controls in approved meat establishments	FSA	FSA	DAERA
Meat hygiene – in slaughterhouses, cutting plants and in minced meat, meat preparations and meat products premises which are combined with approved fresh meat premises	FSA	FSA	DAERA
Meat hygiene in minced meat, meat preparations and meat products premises	LAs	LAs	LAs
Dairy hygiene in milk production holdings	FSA	FSA	DAERA
Dairy hygiene in liquid milk establishments	LAs	LAs	DAERA
Dairy hygiene - in dairy products establishments	LAs	LAs	LAs
Dairy hygiene in combined milk production holding/dairy products establishments	FSA & LAs	FSA & LAs	DAERA
Raw milk sampling - cows	FSA	FSA	DAERA
Raw milk controls – species other than cows	LAs	LAs	DAERA
Hygiene – classification & monitoring of shellfish harvesting areas	FSA /LAs	FSA /LAs	FSA /LAs
Eggs hygiene – production units	AHPA	APHA	DAERA
Eggs hygiene – packing stations	LAs	LAs	DAERA

Eggs hygiene – processing plants	LAs	LAs	LAs
Primary production	LAs	LAs	DAERA
Other hygiene controls including at catering and retail establishments	LAs	LAs	LAs
Import controls –products of animal origin (POAO)	LAs / PHAs	LAs / PHAs	LAs
Import controls – food of non-animal origin (non-POAO)	LAs / PHAs	LAs / PHAs	LAs
Fish and shellfish hygiene	LAs	LAs	LAs
FHRS	LAs	LAs	LAs
Trichinella controls	FSA	FSA	DAERA

## Responsibility for food standards and delivery of official controls

**Responsibilities: Table 2**

Area	England	Wales	Northern Ireland
Traceability	LAs	LAs	LAs
Nutrition labelling & health claims	LAs	LAs	LAs
Labelling: safety (including allergens and date marking)	LAs	LAs	LAs
Labelling: general (where does not relate to food safety or nutrition)	LAs	LAs	LAs
Beef labelling – compulsory requirements	RPA & LAs	RPA & LAs	DAERA & LAs
Beef labelling – voluntary labelling	LAs	LAs	LAs
Fish labelling	MMO & LAs	MMO & LAs	DAERA & LAs
Protected food names - verification	Approved verification bodies	Approved verification bodies	Approved verification bodies
Protected food names - fraudulent use of registered food names	LAs	LAs	LAs
Composition & standards: organic produce – certification	Approved certification bodies	Approved certification bodies	Approved certification bodies
Composition and standards: organic produce – fraudulent labelling as 'organic'	LAs	LAs	LAs
Composition & standards: foods for specific uses	LAs	LAs	LAs
Composition & standards: general - where it does not relate to food for specific uses or organic produce	LAs	LAs	LAs

Bottled water – recognition of natural mineral waters (NMWs) from non-EEA countries and review of LA decisions on recognition of other NMWs	Defra	FSA	FSA
Bottled water - other aspects	LAs	LAs	LAs
Wine standards	FSA & LAs	FSA & LAs	FSA & LAs
Genetically modified food / novel foods	LAs	LAs	LAs
Chemical safety including contaminants in food, food contact materials, use of additives, flavourings etc.	FSA/LAs	FSA/LAs	FSA/LAs
Pesticide residues in food – national monitoring programme	HSE CRD	HSE CRD	DAERA (soon to be delegated to HSE CRD)
Veterinary medicines residues in food – national monitoring programme	VMD	VMD	VMD (DAERA oversees collection/analysis of samples)
Radioactivity monitoring in food	FSA	FSA	FSA
Inspection and approval of food irradiation facilities	FSA	FSA	FSA

## Responsibility for feed law and delivery of official feed controls

### Responsibilities: Table 3

Area	England	Wales	Northern Ireland (Out of Scope for Ipsos work)
Approvals of establishments manufacturing premixtures and feed containing a medicinal substance or a specified feed additive	VMD	VMD	DAERA
Approvals of other establishments where required and registration of feed premises	LAs	LAs	DAERA
Feed hygiene inspections and sampling	LAs	LAs	DAERA
Feed import controls	LAs	LAs	DAERA
Labelling	LAs	LAs	DAERA
Composition and standards	LAs	LAs	DAERA
Traceability	LAs	LAs	DAERA
Biotechnology – genetically modified feed	LAs	LAs	DAERA
Chemical safety – prohibited and undesirable substances	LAs	LAs	DAERA

Chemical safety -specified feed additives	VMD	VMD	DAERA
Veterinary medicines residues monitoring	VMD	VMD	VMD (DAERA oversees collection/analysis of samples)
Pesticide residues monitoring	HSE CRD	HSE CRD	DAERA (to be delegated to HSE CRD)
Medicated feed	VMD	VMD	DAERA
Animal protein in feed ban	APHA	APHA	DAERA





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