

WRS Board

Date: 26th June 2025

Food Safety: Development of WRS new food officer resource

Recommendation	That the Board notes the Report.
Background	<p>All local food authorities, as defined in legislative provisions, must report their activities twice a year to the Food Standards Agency (FSA,) as the national level competent authority. Reports cover inspections done, new premises registered, complaints handling and sampling activity plus details of the number of food officers available. The Agency's reporting systems are driven by inspection numbers and similar figures, not outcomes.</p> <p>The data provided is used by the FSA to monitor and compare local authority performance for consistency of approach in line with the Food Law Code of Practice [FLCoP]. A food premise's risk is rated from A (High) to E (Very Low). "A" rated premises receive visits most often, whereas "E" rated may only receive contact every 3-5 years.</p>
Report	<p><u>FSA Intervention</u></p> <p>The resource reductions of recent years have led to most local authorities finding it difficult to operate in full compliance with the FLCoP, including the WRS partnership. As many Board members will be aware, the Covid pandemic led to the cessation of routine food safety work on order of the Agency, which when lifted left a significant backlog of work that many local authorities are struggling to catch up with.</p> <p>Where the FSA has concerns regarding the performance of local authorities, it operates an escalation process through its own organisation, with the end point being its ability to request that the Minister make an order under the provisions in the Food Safety Act 1990 to require a local authority to comply. The partnership found itself part of this escalation process at the end of 2023. We were asked by FSA how we were going to get back on track with</p>

inspecting our New Premises (some 800 per year) and our D-E rated businesses, i.e. those managing their food safety risks to a very high standard or very low risk businesses such as cakemakers, small retail shops, wet bars. These three categories form the bulk of our database, estimated in the region of 75 to 80% of premises. Some of D rated premises and the whole E category can be subject to Alternative Enforcement Strategies [AES], which means a range of interventions including inspection with alternative phone contact, trading status letters, questionnaires, and newsletters.

Recruiting Additional Officers

Data provided by the FSA indicated that the Partnership was towards the bottom of a list of local food authorities in terms of the number of full-time equivalent officers available for food safety work compared to the number of premises in the area. The Agency decided to commence its formal escalation process. Officers worked on what levels of capacity may be needed to build on the existing officer complement. In February 2024 the Board and Partners supported a request for additional funding to increase the establishment of the food competent officers within the Community Environmental Health team.

There is a national shortage of Environmental Health Officers, so the service opted to recruit three additional Regulatory Support Officers [RSO] and two Technical Officers (Food). Whilst it is difficult to recruit fully competent staff, three qualified candidates (an EHO, a graduate EHO and an individual with the National Certificate in Food Control) were found. The RSO recruitment process resulted in an initial short list of some 20 quality applicants. It was completed in the Summer of 2024 and all successful candidates started work during October-November of that year.

The two new Technical Officers have relevant food safety qualifications as required in the FLCoP and, after competency review, are now able to inspect all categories of food premises. Their initial work has been focussed on reducing the backlog of interventions at D-rated premises. The rest of this report focuses on the difference the four RSOs are making to completing the food programme, not just the E-rated interventions but wider activities supporting our EHOs in the work they do.

RSOs are a new addition to food staffing options, and WRS led the way in developing this role when it employed its first RSO in January 2022. The Agency has now recognised the role of RSO as:

“..... officers who do not hold a ‘suitable qualification’ as defined in the FLCoP, but have been assessed as competent, to carry out the activities set out in Chapter 3 of the FLCoP. These officers may locally be referred to as ‘technical officers’ or similar.”

The Code allows local authorities to authorise regulatory support officers to perform any of the following activities under appropriate

supervision:

- Alternative interventions education, advice, and coaching information gathering, excluding the sub-activity gathering, processing, and sharing intelligence

This is how our new capacity is being deployed.

Competency of Officers

The FSA requires the Food Lead-Officer to ensure all officers are 'competent' to undertake the local food safety programme. There are specific qualifications approved by FSA and listed in the FLCoP for those undertaking food work. Currently there is no specific qualification for RSO.

Our Food Lead developed an internal training programme combined with attendance at external courses offered by the Chartered Institute of Environmental Health (CIEH,) and the UK Health Security Agency (UKHSA,) Having completed their six-month probation satisfactorily all officers are now undertaking the CIEH Level 3 Food Safety Course to supplement the initial work done with them. This is on-line and candidates must achieve an 83% pass rate. No RSO is currently authorised to undertake formal enforcement activity such as serve Notices although this may be possible after relevant training as it is the local authority that determines if they are competent to do so.

None of the officers had previously worked in local government. All have brought different experiences to the role, from retail to sales and the travel sector. One is a fluent Chinese speaker, and one has exceptional IT skills. Despite the lack of experience, they all settled into their new role very quickly and have really started to deliver results.

The first six months were focussed on providing relevant skills and data cleansing, which soon established that many of the previously registered low-risk businesses had ceased trading. A range of activities have been used to develop the new officer cohorts' skills including:

- Physical inspections to develop officer confidence.
- A project to check that premises were displaying the correct FHS rating.

All new officers have had to learn how to deal with non-compliant premises as they have frequently encountered problems like unrecorded changes of ownership, lack of paperwork, insufficient cleaning and even selling food past its use-by date.

The programme of work for the new officers in 2025/6 will again be project focussed starting with wet bars, after some further training on the sector. Their other priority is to increase sampling in food premises according to national and regional priorities identified by the FSA and UKHSA. The RSO with IT skills is also working with the Food lead on a review of food-work process flows to support this

service area with some of the documentation that is required.

These officers have genuinely made a difference to the service's ability to tackle lower risk food premises. The appendix below outlines some of the work undertaken from October 2024 to March 2025

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APPENDIX

ACTIVITY BY NEW OFFICERS

1. Total number of premises with interventions

VISIT TYPE	Total
Inspection	308
Revisits	3
Information Gathering	551
Total Interventions	862

This compares with 123 interventions by our previously employed RSO in 2023/4.

2. Premises on E-rated lists closed by new TO/RSO: 311

This is compared with the total no of premises closed between Oct and March at **669**.

3. Total Food Officer Interventions October-March for all food staff (1 October 2024 to 31 March 2025):

Inspections & Audits	1129
Verification & Surveillance	48
Sampling Visits	1
Advice & Education	19
Information/Intelligence Gathering	803

Of these 2000 interventions, 863 were undertaken by new officers.

4. New Premises registrations (Oct-Mar).

Hazard Status	Count
Not recorded	1
HIGH	277
LOW	94
AES	38
Total	410

So, almost 1/3rd of new registrations can be tackled initially by the new officers.