



**Open Report on behalf of Martin Samuels,
Executive Director - Adult Care and Community Wellbeing**

Report to:	Public Protection and Communities Scrutiny Committee
Date:	30 January 2024
Subject:	Trading Standards Food Safety Activity 2022-2023

Summary:

This report provides an update on the work undertaken by Lincolnshire County Council Trading Standards Service in respect of Food Safety Standards Enforcement in the financial year 2022-2023.

Actions Required:

Members of the Committee are invited to review and comment on the contents of this report and the delivery of food safety and standards work undertaken by the Trading Standards Service.

1. Background

1.1 The Food Law Code of Practice (the Code) is issued under Section 40(1) of the Food Safety Act 1990, Regulation 6(1) of the Official Feed and Food Control (England) Regulations 2009 and Regulation 26 (1) of the Food Safety and Hygiene (England) Regulations 2013. The most recent version was issued in June 2023.

1.2 The Code places a statutory duty on Competent Authorities (CAs) to enforce the requirements of food law. Local Authorities (LAs) and Port Health Authorities (PHAs) are designated Competent Authorities. In a two-tier authority there is a division of responsibilities between County and District Councils. In Lincolnshire, responsibility for delivering food controls on behalf of the County Council is delegated to the Trading Standards Service.

1.3 County Councils investigate and take enforcement action in cases relating to:

- Chemical contamination, except where it is found in primary production establishments when responsibility is shared with the District Councils.

- The adulteration, composition, advertisement, presentation, and the promotion of food information, apart from the identification markings regarding the hygiene of foods of animal origin when responsibility sits with the District Council.
- An identified health risk, notified by a Public Analyst as a result of sampling.

1.4 District Councils will investigate and take enforcement action in cases relating to:

- Microbiological quality of food, contamination by micro-organisms and their toxins and contamination by foreign matter, except where such contamination is found in establishments at the level of primary production when responsibility is shared with the County Council.
- Presence of chemical contaminants that might pose an imminent threat to public health when they will liaise closely with the County Council. Advice from the Public Analyst, or Competent Examiner, must be sought to establish whether contamination by chemicals is likely to pose an imminent risk to health.

1.5 In certain circumstances, both District and County Councils share responsibility and either or both may investigate in respect of:

- **Food Alerts:** Where a clearly identified risk to health has been notified by means of a Food Alert issued by the Food Standards Agency (FSA), either or both may be requested to investigate and take enforcement action. Responsibility will be defined in the Food Alert.
- **Use By Dates:** Where food is found to be on the market after its use by date, it is automatically deemed to be unsafe.
- **Primary Production:** While the FSA has not specified whether investigations and enforcement action in relation to primary production are undertaken at District or County level, the Code suggests that most of this work will be undertaken at County level.
- **Allergens:** Both Districts and County Councils can enforce the Food Information provisions in relation to allergen labelling of non-prepacked and pre-packed for direct sale foods. It must be agreed at a local level how enforcement of these provisions will be shared.

1.6 Trading Standards Officers can undertake food enforcement work at any point in the manufacturing, supply or retail chain including primary production on farms, manufacturers, importers, and wholesalers of ingredients or finished foods, food retailers, kitchens, catering establishments, restaurants and takeaways.

2. General Requirements of the Code

2.1 As a Competent Authority, Lincolnshire County Council must have regard to:

- The Code and the Food Law Practice Guidance (the Practice Guidance).
- The Framework Agreement on Official Feed and Food Controls by Local Authorities (the Framework Agreement).
- Any appropriate guidance.
- If they consider public health or food safety is likely to be compromised by complying with the Code, discuss the matter with the FSA at the earliest opportunity and before any decision is taken.
- Provide the FSA with relevant datasets, as detailed in the Practice Guidance.

2.2 The code requires documented procedures, policies, plans and programs be set-up, and maintained. The Trading Standards Service undertakes annual service planning based on the principles set out in the Framework Agreement. In Quarter 1 each year, a plan of food standards enforcement activity is produced. Consideration is given to the following requirements of the Framework Agreement and Food Law Code of Practice:

Local, regional, and national liaison

2.3 As the Competent Authority, Trading Standards must put in place effective liaison arrangements, with:

- Neighbouring competent authorities, delegated bodies, government agencies and any other appropriate body.
- Other delegated bodies or government organisations aimed at rationalising enforcement and reducing burdens on business.

2.4 In two tier Competent Authority areas, the District and County Council must ensure that:

- Effective day-to-day liaison arrangements are in place, documented and operating satisfactorily.
- Initial food business registration information is supplied by the District Council to the County Council within 28 days of receipt.

- Information they receive that indicates a change in the operations within a food business establishment, and information on any withdrawal, suspension, or reinstatement of an establishment's approval, is passed to the other relevant Competent Authorities within 28 days.

2.5 Competent Authority liaison groups help to maintain effective and efficient delivery of official food controls. The lead food officer or another competent officer represents the authority at liaison group meetings.

Primary Authority

2.6 Primary Authority is a statutory scheme administered by the Office for Product Safety and Standards (OPSS). In England, and Wales the scope of Primary Authority includes matters relating to food and feed. Food businesses that wish to benefit from Primary Authority will need to partner with a local authority.

2.7 Primary authorities provide advice on compliance to businesses that other local regulators must respect. They can also produce an inspection plan for a business or the members of a trade association (or other type of group), to improve the effectiveness of visits by local regulators and underpin better sharing of information.

2.8 There are benefits for business, regulators and citizens arising from Primary Authority including:

Businesses:

- Have access to relevant, authoritative tailored advice.
- Gain recognition of robust compliance arrangements.
- Can draw on an established and effective means of meeting business regulations.
- Can be more confident they are protecting themselves and their customers.

Regulators:

- Have greater clarity over where responsibility lies.
- Can support local economic growth through stronger business relationships.
- Can improve the consistency of local regulation and target resources on high-risk areas.
- Can develop their staff expertise via partnerships.
- Can protect front line services through cost recovery.

Citizens:

- Are better protected as businesses find it easier to comply with legislation.
- Are at reduced risk as local authorities better understand the businesses they regulate and can target resources on high-risk areas.

2.9 The FSA endorses Primary Authority and works as a National Regulator with OPSS to support the delivery of Primary Authority for food regulators to deliver consistency between Competent Authorities and avoid unnecessary duplication of regulatory effort. The FSA expects Competent Authorities to fulfil their statutory obligations under Primary Authority. Competent Authorities must have regard to the Department for Business, Energy and Industrial Strategy (BEIS) Primary Authority Statutory Guidance, specifically to Part E which provides guidance on their responsibilities as 'enforcing authorities' within Primary Authority.

Authorisation, qualifications, and competency

2.10 Competent Authorities must appoint enough suitably qualified and competent officers to ensure that official food controls can be performed efficiently and effectively.

2.11 Competent Authorities must appoint one or more, suitably qualified and competent lead food officer(s), who are responsible for the operational management of food law matters.

2.12 The lead food officer(s) must ensure officers carrying out official food controls or other official activities hold a statutory qualification listed in the code of practice, that is relevant to their role and the activities they will be authorised to undertake.

2.13 Where food business establishments operate quality assurance systems, authorised officers should possess an appropriate qualification, or have equivalent professional experience and competency, to enable them to assess quality assurance systems.

2.14 To maintain authorization, officers must receive appropriate training based on the principles of continuing professional development (CPD). Competent Authorities must ensure authorised officers remain competent by receiving a minimum of 20 CPD hours per year, relevant to the activities they are authorised to undertake.

3. Delivery of Interventions

Frequency of Interventions

3.1 A Food Standards Scoring System is incorporated into the Food Law Code of Practice based on several variables including the complexity of legislation a business must comply with, the potential adverse effects on consumers and other businesses if problems arise, and a Competent Authority's confidence in that business based on their interactions with them.

3.2 Trading Standards maintains a database of food businesses updated regularly with details of new businesses registered with the District Councils. Each premise is risk assessed based on activity and compliance levels. A score is calculated that identifies the level of risk associated with each premise.

3.3 The table below shows the score banding and how it correlates to the intervention frequency:

Category	Score	Minimum Intervention Frequency
A	101 - 180	At least every 12 months
B	46 - 100	At least every 24 months
C	0 - 45	Alternative enforcement strategy or intervention every five years

3.4 Based on these FSA bandings, Lincolnshire had 14 businesses requiring an annual intervention, 1451 requiring a biennial intervention and 6487 that should be subject to intervention every five years or via an alternative enforcement strategy.

3.5 Interventions include inspections; monitoring; surveillance; verification; audit; and sampling.

3.6 To fully meet the requirements of the code of practice and framework agreement, Trading Standards should complete interventions at 740 businesses in categories A and B and either an intervention or alternative enforcement strategy at 1298 businesses in category C based on the minimum intervention frequency above.

4. Food Complaints

4.1 All food related complaints received made to the Trading Standards Service are reviewed on receipt by the service's intelligence team and assessed in line with service objectives and documented Duty Officer guidance.

4.2 Complaints may be noted for intelligence only, passed to partner agencies or allocated for further investigation. Complaints relating to allergens, food on sale past its use by date or on sale with amended durability markings, substitution of ingredients, chemical contamination or food fraud would be considered serious and referred for further investigation.

4.3 Complaints noted for intelligence purposes only are reviewed regularly to identify any emerging issues or potential threats. They are also monitored to identify premises for inclusion in sampling and inspection programmes where appropriate.

5. Advice to Business

5.1 Trading Standards endeavours to support businesses comply with their legal responsibilities. General food safety advice and guidance is available to all food business operators free of charge, time limited to one hour.

5.2 The Service can provide more detailed advice to businesses seeking guidance for technical or complex enquiries, training or auditing on a pay as you go basis. Charges for this service are based on cost recovery and offered to businesses that want advice but do not want to enter a formal Primary Authority partnership.

5.3 Any business wanting to enter a Primary Authority partnership can approach the service. Again, charges are applicable on a cost recovery basis and the number of hours is agreed annually.

6. Food Sampling

6.1 Food sampling, analysis and examination provides intelligence and evidence on the safety and authenticity of food on the UK market. It supports enforcement action to protect consumers and enables the FSA to meet its statutory obligations as a Central Competent Authority.

6.2 Competent Authorities must ensure:

- Food sampling is undertaken effectively and consistently.
- Non-compliance is dealt with in accordance with the requirements of the Code.

7. Food Safety Incidents

7.1 A “food incident” is defined as any event where there are concerns about actual or suspected threats to the safety, quality or integrity of food that could require intervention to protect consumers' interests based on the information available. Quality should be considered to include food standards, authenticity and composition.

7.2 There are three categories of food incident which may overlap:

- **Food Hazards:** Food-related incidents involving (or suspected to involve) a biological, chemical and/or physical agent in food, or the condition of any food with the potential to cause an adverse effect on the health or safety of consumers.
- **Food fraud and food crime:** Serious dishonesty which has a detrimental impact on the safety or the authenticity of food, drink or animal feed. Food crime can be thought of as serious food fraud.
- **Non-Hazardous Incidents:** Issues of quality, provenance, authenticity, composition and labelling that may impact the supply chain.

7.3 Food hazards are categorised according to the following criteria:

- **Localised food hazard:** Food is not distributed beyond the boundaries of the competent authority and is not deemed to be a serious hazard. Incidents are dealt with by local Competent Authority, in conjunction with other relevant agencies.
- **Serious localised food hazard:** Food is not distributed beyond the boundaries of the Competent Authority, but which involves or may involve: Allergens, E. coli O157, other Verocytotoxin-producing Escherichia coli (VTEC), Clostridium botulinum, Salmonella typhii or Salmonella paratyphi, or is considered significant because of the vulnerability of the population likely to be affected, the numbers involved or any deaths associated with the incident for example. The Competent Authority must notify the FSA and other relevant agencies at the earliest opportunity by the quickest available means and confirm in writing on an incident report form.
- **Non-localised food hazard:** Food is distributed beyond the boundaries of the Competent Authority. The Competent Authority must notify the FSA and other relevant agencies at the earliest opportunity by the quickest available means and confirm in writing on the incident report form.

7.4 Once a food hazard has been identified, the Trading Standards Service must immediately carry out a risk assessment to determine the likely scale, extent and severity of the risk to public health or safety. Responsibility at local level remains with Trading Standards unless and until written notification is received from the FSA.

7.5 Food incidents that result in contraventions in law but do not amount to food hazards are normally resolved by Trading Standards and the food business operator. Significant incidents are reported to the FSA immediately.

7.6 The Service regularly publishes Food Safety Alerts issued by the FSA through our Social Media accounts.

8. Interventions at Food Establishments

8.1 The Trading Standards Service carried out 163 inspections at food premises in 2022-23. This represents an increase on the 103 undertaken in 2021-22. Most of these inspections were undertaken on site. The type of business premise inspected with the number that were found to be compliant and non-compliant are in the table below.

Business Type	Compliant	Non-Compliant
Baker	11	8
Butchers	18	4

Dairy	1	0
Greengrocer	1	0
Grocers/Deli	2	4
Supermarket	9	7
Pub	1	0
Restaurant / Cafe	18	11
Food Contact Materials Manufacturer	0	1
Confectioner / Sweet Shop	1	1
Caterer	1	0
Takeaway	24	21
Garage / Petrol	1	1
Furniture	1	0
DIY	1	0
Garden Centre / Nursery	1	0
Other Catering Accommodation	1	0
Other Food Premises	4	13

8.2 Food allergen and food information labelling remain the most common reasons for noncompliance.

Food Complaints

8.3 Trading Standards have received 103 complaints regarding food safety or standards in 2022-23, down from 127 in 2021-22. All were reviewed by the Duty officer on receipt in line with documented guidance and those relating to foreign bodies, microbiological contamination or hygiene on the premises were referred to the local District Council.

8.4 The table below contains a breakdown of the complaints and enquiries by category:

Category	Number of Complaints and Enquiries
Microbiological	4
Foreign Body (EH)	5
Chemical	2
Labelling	25
Hygiene of Premises (EH)	6
Composition	1
Presentation	1
Business Advice	6
Out of Date Food	6
Enquiry from Other Agency	8
Fraud	1
Substitution	1
Meat Species	1
Contamination	1
Allergens	18
Use By Date	6
Best Before Date	4
Other	13
Total	103

8.5 Most complaints related to food labelling (27), and allergens (19). This represents a small improvement compared with 2020-21 when the service received 51 complaints in total for these categories. All allergen related complaints and enquiries are referred to an authorised food officer to follow up due to potential safety concerns. If the manufacturer or retailer is out of County, the local Trading Standards service is notified.

8.6 Complaints relating to food being offered for sale after the use-by date has passed are referred to an officer as the food is deemed unsafe and represents a potential risk to health. The use-by date is reserved for food that is likely to become microbiologically unsafe such as meat, fish and some dairy products that could lead to food poisoning if consumed after the stated date.

8.7 Food sold past the best-before date does not present a health risk. These complaints are not automatically referred unless there are other aggravating factors, but they do form part of the wider intelligence picture and are considered to present a higher risk premises for inclusion in inspection and sampling plans.

8.8 Complaints within the other category related to a range of food related matters including the incorrect display of a food hygiene rating on a food delivery website, food delivery services, the presence of apple juice in a cherry and raspberry drink and the advertised weight of packed food.

Primary Authority

8.9 Trading Standards has retained five Primary Authority partnerships with the following companies:

Lincolnshire Co-operative Society including Gadsby's:

- Our Primary Authority Partnership covers 92 Food Stores located in Lincolnshire and the surrounding counties. They recycle all profits locally by sharing dividends with members, investing in new and improved services and by supporting local community groups, charities, and schools through their Community Champions scheme.

Gousto:

- Gousto is a subscription based online recipe kit company. They produce boxes of ingredients supplied to customers in pre-measured portion sizes for cooking at home, based on recipe instructions developed by their chefs.

Bakkavor:

- Bakkavor is a leading provider of fresh prepared food (FPF). Customers include all the well-known UK grocery retailers as well as some of the world's best-known international food brands. Products cover a range of categories including meals, desserts, pizza and bread, and salads.

Minster Fine Foods:

- Minster Fine Foods in Bourne represent a selected number of Continental Food Manufacturers responsible for the sales and marketing of their products in the UK, dealing with manufacturers across Europe, and providing products to caterers across the UK.

Branston Potatoes

- Branston Potatoes grow and sell potatoes to business and consumers as well as producing a range of potato based ready to cook prepared foods and potato-based ingredients.

8.10 This year we have supported our Primary Authority businesses with advice relating to edible insects, labelling of plant-based meat alternatives, egg coding and traceability and the use of the term "Free Range" when it was mandatory to house commercial flock during the avian influenza outbreak. Advice was provided in respect of Halal labelling and post EU exit import changes, product recall, fortification of flour and quantitative ingredient declarations. Officers also conducted a site inspection that included intake, production, and date coding.

Advice to Business

- 8.11 Trading Standards received 65 requests for business advice from food businesses in 2022-23. 59 were made directly to Trading Standards with most coming via the trading standards business email account.
- 8.12 Most enquiries received are requests for labelling advice, in particular allergen labelling. The introduction of mandatory allergen labelling for foods that have been prepacked for direct sale has resulted in many businesses asking for advice since the requirements became law in October 2021.
- 8.13 Trading Standards assisted a company in the release of 6000kg of imported organic pumpkin kernels being held at the border having been found to contain a pesticide residue. An officer supervised the relabelling of the products removing references to them being organic. On completion the pumpkin kernels were released and could be sold as a conventional product.
- 8.14 The service also oversaw the removal of the term organic from a consignment of avocados which again did not satisfy the requirements to be labelled as such.
- 8.15 A Trading Standards Officer seconded to Business Lincolnshire oversaw production of a Business Lincolnshire branded [Food Allergen Training Video](#). The video is available on the Business Lincolnshire YouTube channel and has been viewed over 450 times and shared with the Hospitality and Catering departments at Grantham, Boston, Stamford, Lincoln and Louth colleges to inform their catering students.
- 8.16 The video is based on another longer video produced by the Greater Gwent Food Group. It includes testimony from families whose lives have been affected by food intolerance who kindly gave consent for their experiences to be included.
- 8.17 Following an enquiry from the Food Education Programme Officer in LCC, work began on a second video aimed specifically at those catering for schools and nurseries.

Food Sampling

- 8.18 The food sampling budget for 2022/23 was maintained at £25,000. This allowed us to plan for the procurement and analysis of 164 samples (not including the 19 officer-initiated samples). The table below includes details of the products sampled and what they were analysed for:

Product	Analysis For	No Taken	Satisfactory	Unsatisfactory
Prepacked for direct sale sandwiches – No mayo or Salad Cream	Presence of Allergens.	31	25	3 x undeclared egg. 2 x undeclared milk. 1 x undeclared egg and milk.

Complaint Samples	Various.	8	6	1 x undeclared chicken in spicy beef pizza. 1 x undeclared milk in vegan pizza.
Takeaway Ethnic/Indian Meals containing lamb	Substitution.	15	12	1 x contained beef instead of lamb. 2 x contained beef, lamb and chicken.
Takeaway Meals containing Chicken or Vegetables	Presence of Peanuts.	15	14	1 x undeclared peanuts detected.
Takeaway Peshwari Naan	Presence of Peanuts.	30	27	3 x undeclared peanuts detected.
Spirit Drinks	Alcohol by volume content and compliance composition and labelling requirements	10	8	1 x deficient alcohol content. 1 x food labelling.
Chicken Burgers	Presence of sulphites and milk allergen casein.	11	9	2 x undeclared milk.
Undeclared sulphites and cow's milk protein in Kebab/Donor meat	Presence of sulphites and milk allergen casein.	15	6	1 x presence of sulphur dioxide. 8 x undeclared milk.
Butchers BBQ Meats	Description	12	4	7 x contaminated with other undeclared meats. 1 x undeclared sulphites

Cod and Haddock	Species	16	15	1 x haddock supplied when cod ordered.
Officer Initiative	Various	19	15	1 x prepacked sandwich incorrectly labelled. 1 x club sub roll undeclared egg. 2 x undeclared meat.

8.19 The sampling plan focussed on undeclared allergens, compositional standards and ensuring food was correctly labelled and described.

8.20 Thirty samples of ham salad rolls with no spread or mayonnaise were obtained from premises across the County. Three were found to be unsatisfactory due to the presence of egg and one for the presence of milk. Revisits were made to the four premises to discuss issues arising from cross contamination and provide advice on best practice. One café took the decision to remove egg from their menu to avoid cross contamination in the future.

8.21 One lamb dish obtained from an ethnic takeaway was found to contain 100% beef and no lamb. Follow up enquiries showed the supplier invoice only described the product supplied as “meat”. The matter was taken up with the wholesaler who was advised that the actual species must be included on their invoice.

8.22 Several samples of doner kebab meat were found to be unsatisfactory due to the presence of undeclared milk. Further investigation identified two instances where milk was not included in the list of ingredients by the manufacturer. Details were passed to the relevant Trading Standards service for the factories where the kebab meat was manufactured to provide advice and guidance.

8.23 Thirty samples of Peshawari naans were sampled for the presence of undeclared peanuts resulting in three adverse results. One provider admitted they were aware naan contained peanuts and confirmed that it should not have been supplied to the officer who had ordered a peanut free naan over the phone. Trace amounts of peanut were found in coconut flour when the Peshawari naan ingredients were examined and sampled during follow up enquiries. The matter was referred to the local Trading Standards service where the factory packing the coconut flour was based.

8.24 Twelve samples of BBQ meats were sampled and submitted for analysis to confirm the species of meat was properly declared. Five were found to contain meats other than that declared. Two failed food information labelling requirements and a further sample failed for the presence of an undeclared allergen, namely sulphites. Revisits to

provide advice and guidance have been made to all premises where an adverse sample was taken.

Food Safety Incidents

8.25 Trading Standards has responded to several requests for assistance from the Food Standards Agency in relation food incidents. This included enquires to trace poultry meat from a premises infected with avian influenza, and food supplement drinks labelled only in German.

8.26 Checks were made to establish if a local retailer had been supplied noodles from Thailand manufactured with a genetically modified ingredient.

8.27 Trading Standards also assisted in ensuring that a local business had withdrawn a food product containing the additive, tartrazine, that was not permitted in that category of food. The FSA issued advice that the product was to be withdrawn from sale in Great Britain.

8.28 Trading Standards has continued to support a local business that processes consignments of nuts found to contain excessive levels of aflatoxins. Officers have overseen the delivery and treatment of two consignments and taken formal samples for submission to the Public Analyst. On receipt of a satisfactory result confirming that the aflatoxins levels are within permitted levels, the nuts can be incorporated into animal feed.

8.29 Trading Standards has also promoted 86 national food recall notices issued by the FSA through our social media platforms. Recall notices were issued in response to a variety of food incidents including the presence of undeclared allergens, microbiological contamination, and the presence of foreign bodies.

9. Liaison with Other Organisations

9.1 Trading Standards Officers maintain strong partnerships with the District Council Environmental Health Teams. Information is shared relating to food safety incidents and problems identified during inspections undertaken by either service that are enforced by the other. This would include matters of low food hygiene rating and potential microbiological contamination, poor allergen awareness and working practices that could result in cross contamination, out of date food and the presence of food not labelled correctly.

9.2 Trading Standards provided food standards assistance to Environmental Health Officers investigating a school meal provider who provided a dairy intolerant child with a meal containing cheese that resulted in a successful prosecution brought by the District Council.

9.3 Joint inspections were carried out with Environmental Health colleagues to a restaurant following a complaint concerning the presence of gluten in a meal

supplied to a gluten intolerant consumer and to a fast-food chain outlet following a complaint that allergen information was not available for prospective customers to review.

9.4 The Lead officer for Food represents Lincolnshire Trading Standards on the Trading Standards East Midlands regional working group on food and allergens. The Head of Trading Standards also attends the meetings as the Regional Heads of Service representative. The group meets on a quarterly basis to discuss food safety and allergen related issues and to share best practice. The Food Standards Agency and the Food Standards Agency Food Crime Unit are invited to attend and provide updates on their work.

10. Training and Competency

10.1 Trading Standards had 11.6 F.T.E Trading Standards Officers who hold a food qualification included in the food law code of practice. Not all staff holding a qualification are deemed competent to undertake all aspects of food safety work. This is due to them working predominantly in other areas of the service where they have not had the opportunity to maintain their CPD and satisfy the requirements of the Code.

10.2 In Lincolnshire, Trading Standards Officers are either deemed to be competent generally to undertake all official controls or competent in one or more of five areas below:

- Inspection of Food Establishments.
- Use of Enforcement Sanctions.
- Sampling.
- Import and Export Controls.
- Reactive investigations.

10.3 The Service has 3.6 F.T.E. who are competent in all areas. It should be noted that these officers are generalist officers who also undertake other non-food related duties. It is estimated that they contribute the equivalent of 2.1 F.T.E. to food related work.

10.4 An additional 3 F.T.E are considered competent to undertake inspections, use enforcement sanctions and undertake reactive investigations, with an additional 3.6 F.T.E. competent to take formal food samples. They contributed an additional 0.7 F.T.E. to food related work. Two Officers holding a food qualification are not deemed to be frontline but have assisted in training and assessing those studying for the food qualification.

10.5 The Service committed £25,825 to training in 2022-23. £5,453 has been utilised to training new food officers and to assist qualified officers in meeting their CPD requirements.

10.6 Looking forward the Service has one officer currently undertaking stage two of the Trading Standards Qualification Framework. A further four are in the first year of, or due to start, a Trading Standards Professional apprenticeship. Two officers who have recently completed stage two of the qualification framework are currently studying food and will sit their exams in 2024. One Officer successfully completed the food module and is currently working to gain further food experience.

10.7 The Service has recently lost one qualified officer due to retirement and expects to lose two more to retirement within the next two years. One officer who was studying for the food exam also left the service finding employment in another regulatory service.

11. Conclusion

11.1 The Trading Standards Service acknowledges that they fall below the level of interventions required under the Food Law Code of Practice. However, proactive work is based on intelligence and the service endeavours to respond to complaints and service requests to address concerns and support local businesses.

11.2 The Service has established partnership working arrangements with the District Councils and other neighbouring regional trading standards services. These partnerships are an effective means of sharing intelligence and best practice.

11.3 The Primary Authority partnerships are being maintained and offering a good level of support to the businesses signed up. The Trading Standards Service should look to expand this area of work if capacity to undertake food work increases.

11.4 The Trading Standards Service is committed to training and developing its officers including meeting the continuous professional development requirements necessary for officers to retain their competency to undertake food safety work.

11.5 The Service recognises the profile of those currently authorised and competent to undertake food standards work and is actively training officers to replace those who will leave the service in the coming months and years.

12. Consultation

a) Risks and Impact Analysis

No project planning, changes to services, policy development or commissioning/decommissioning of services are considered in this report.

13. Background Papers

The following background papers as defined in the Local Government Act 1972 were relied upon in the writing of this report.

Document title	Where the document can be viewed
The Food Law Code of Practice (England)	Food law code of practice (England)

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