Food Standards Scotland

For safe food and healthy eating

Local Authority Food Law Service Plan 2025 – 2026 Review

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Executive Summary

This report presents a consolidated review of Local Authority Food Law Service Plans for 2025–2026 across all 32 Scottish Local Authorities against the requirements of the Food Law Code of Practice (Scotland) 2019 and the Interventions Food Law Code of Practice (Scotland) 2019. The review assessed whether service plans referenced key Code requirements, quantified planned activity and demonstrated compliance with Code expectations.

Overall, most authorities had established service planning arrangements and demonstrated a commitment to risk-based service delivery. However, significant variation was identified in the extent to which authorities quantified service activity, reported performance outcomes and demonstrated compliance across all assessment criteria.

Key findings included:

- 91% of authorities maintained a current service plan.
- 75% demonstrated a clearly defined risk-based planning approach.
- 81% quantified staffing resources and workforce capacity.
- Only 63% quantified planned intervention activity.
- Only 47% documented out-of-hours arrangements.
- Significant variation remains in performance reporting, monitoring and governance arrangements.

System-wide issues identified included:

- workforce capacity and sustainability.
- intervention backlogs and under-delivery.
- increasing reliance on prioritised delivery models.
- growth in unrated and unknown risk businesses.
- inconsistent performance measurement and reporting; and
- increasing reactive service demands.

Despite these pressures, examples of innovation and good practice were identified in workforce development, digital transformation, performance management and adaptive risk-based service delivery.

1 Introduction

The review looks to provide assurance regarding planned food law service delivery arrangements across Scotland and assesses whether service plans demonstrate appropriate governance, resources, intervention planning and performance management.

2 Methodology

All 32 Local Authority Service Plans were reviewed against ten core requirements derived from the Codes of Practice:

- Annual Service Plan in place.
- Defined intervention programme.
- Risk-based planning approach.
- Resource assessment.
- Revisits and follow-up arrangements.
- New business arrangements.
- Out-of-hours intervention arrangements.
- Sampling programme.
- Monitoring and performance reporting.
- Governance and review arrangements.

Assessment considered not only whether information was present within the service plan, but also whether sufficient detail was provided to demonstrate compliance with Code requirements.

Accordingly:

Compliance assessments were based on review of all 32 Local Authority Food Law Service Plans against the requirements of the Food Law Code of Practice (Scotland) 2019 and the Interventions Food Law Code of Practice (Scotland) 2019.

For consistency, findings were assessed using three categories:

- **Referenced** – the subject area was mentioned within the service plan.
- **Quantified** – numerical activity levels, workloads, outputs or performance measures were provided.
- **Compliant** – sufficient information was provided to demonstrate that the Code requirement had been adequately addressed.

Whilst a consistent assessment framework was applied across all authorities, professional judgement was required due to significant variation in service plan structure, format and level of detail. Findings should therefore be viewed as indicative assessments of compliance rather than absolute measures.

3 Assessment Results

The review assessed whether each authority had:

- referenced the requirement within its service plan.
- quantified planned activity or performance where appropriate; and
- demonstrated compliance with relevant Code expectations.

3.1 Summary of Findings

Requirement	Referenced	Quantified	Compliant
Annual Service Plan	100%	91%	91%
Intervention Programme	90%	63%	55%
Risk-Based Delivery	100%	75%	75%
Resource Assessment	91%	81%	81%
Revisits	75%	59%	59%
New Business Arrangements	69%	41%	50%

Out-of-Hours Arrangements	47%	47%	47%
Sampling Programme	81%	66%	66%
Monitoring and Performance Reporting	72%	72%	72%
Governance and Review	66%	66%	66%

Percentages are rounded to the nearest whole number and are based on review of all 32 Scottish Local Authorities. Three authorities were operating under multi-year service plans rather than dedicated annual service plans.

3.2 Limitations

Variation in service plan quality, format and detail limited direct comparison between authorities. Findings represent assessment of planned arrangements rather than audited delivery.

4. Key Findings

4.1 Annual Service Planning

Most authorities maintained a documented food law service plan setting out local priorities, service objectives and intended delivery arrangements. Whilst all authorities referenced service planning arrangements, 91% had a current service plan that fully met annual planning expectations. Three authorities relied on multi-year planning arrangements rather than producing a dedicated annual service plan.

The strongest plans linked local priorities, available resources and planned interventions within a coherent planning framework. Weaker plans tended to provide strategic narrative but contained limited quantification of activity or expected outcomes.

4.2 Resource and Capacity

Workforce capacity remains the most significant systemic issue identified.

81% of authorities quantified staffing resources through full-time equivalent (FTE) staffing figures or similar workforce measures.

Significant variation was identified across Scotland. Reported officer-to-business ratios ranged from 1 FTE per 167 food businesses to 1 FTE per 914 food

businesses. Most authorities operated within a range of approximately 1 FTE per 200 to 400 businesses.

Many authorities reported recruitment difficulties, vacancies, succession-planning challenges and workforce development requirements. Common responses to this included:

- graduate and trainee programmes.
- alternative qualification pathways.
- internal progression opportunities; and
- structured workforce development initiatives.

4.3 Intervention Programmes

The Code requires each local authority to establish, maintain and adequately resource a risk-based intervention programme.

Whilst most authorities described a risk-based intervention programme, the quality and consistency of information varied considerably. 63% quantified planned intervention activity whilst 55% provided sufficient information to demonstrate full compliance with Code expectations.

22% of authorities did not clearly report performance against previously planned activity, limiting comparative analysis and assurance regarding delivery.

Where reported, intervention delivery commonly ranged between 60% and 85% of programmed activity. Several authorities reported revisits accounting for between 30% and 70% of programmed workloads.

A recurring theme was the impact of reactive and non-programmed work, including:

- complaints and incidents.
- food alerts.
- export certification.
- approval work.
- new business inspections; and
- revisits.

Stronger practice included:

- quantified intervention programmes.
- reporting of planned versus actual activity.
- separate reporting of reactive work.
- delivery rates and completion percentages; and
- clear alignment between workload and available resources.

4.4 Risk-Based Delivery

All authorities demonstrated some form of risk-based approach to service delivery.

75% clearly described prioritisation arrangements and resource allocation processes aligned with assessed risk.

Around one quarter of authorities had adopted modified or prioritised delivery models due to resource constraints. These commonly included:

- prioritisation of approved establishments.
- prioritisation of Band D and E premises.
- targeted approaches to unrated businesses.
- suspension of lower-priority inspections; and
- defined partial-delivery targets.

Whilst such approaches provide transparency regarding priorities, they also demonstrate increasing reliance on partial-delivery models.

4.5 Revisits

75% of authorities referenced revisit activity within service plans, but only 59% quantified anticipated revisit demand or revisit performance.

Authorities consistently reported significant workloads arising from revisits and compliance verification activity. In many authorities, revisits represented a substantial proportion of overall intervention workloads and required significant resource allocation.

4.6 New Business Arrangements

Approaches to new business management varied considerably between authorities.

Whilst most authorities acknowledged this area of work, only 41% quantified anticipated new business demand. Around half of authorities provided sufficient information to demonstrate compliance with Code expectations.

Many plans described processes for managing new businesses but did not estimate likely volumes or explain how anticipated demand would be accommodated within available resources.

4.7 Out-of-Hours Arrangements

Out-of-hours arrangements represented one of the weakest areas identified during the review.

Only 47% of authorities clearly documented arrangements for responding to food incidents or emergencies outside normal working hours. Although such arrangements may exist operationally, they were frequently omitted from service plans.

The absence of documented arrangements limits assurance regarding emergency preparedness and compliance with Code expectations.

4.8 Sampling

Sampling arrangements varied considerably between authorities.

66% quantified planned sampling activity or described a structured sampling programme. Many authorities relied primarily on national Food Standards Scotland sampling initiatives.

Fewer authorities clearly demonstrated linkage between local risks, intervention priorities and planned sampling activity. Stronger integration of sampling within risk-based planning would improve future service plans.

4.9 Monitoring and Performance Reporting

72% of authorities included arrangements for monitoring service delivery and reviewing performance.

Stronger plans included:

- planned versus actual activity reporting.
- intervention delivery rates.

- defined performance measures.
- variance analysis; and
- corrective actions where targets were not achieved.

A significant minority provided only limited information regarding how performance would be monitored or reported.

4.10 Governance and Review

Two-thirds of authorities provided clear evidence of governance, management oversight or formal review arrangements.

Stronger plans demonstrated clear connections between service planning, performance monitoring, review and corrective action. Weaker plans provided limited information regarding oversight arrangements or performance reporting mechanisms.

4.11 Innovation and Best Practice

A number of authorities demonstrated innovation in response to ongoing service pressures.

Key areas included:

- digital transformation and improved reporting systems.
- workforce development initiatives.
- adaptive and targeted delivery models.
- transparent performance reporting.
- backlog recovery programmes; and
- modernised risk-based intervention approaches.

5. Conclusions

The review found that Scottish local authorities continue to demonstrate a strong commitment to delivering food law services using risk-based principles.

91% of authorities maintained a current service plan, whilst all authorities demonstrated some form of risk-based approach to service delivery. Compliance was strongest in relation to service planning arrangements, resource assessment and risk-based prioritisation.

However, significant variation remains in service plan quality, completeness and quantification of planned activity.

The most consistent findings across the assessment criteria were:

- continuing workforce and recruitment pressures.
- intervention programmes that are not always fully quantified.
- increasing reliance on prioritised delivery models.
- inconsistent treatment of new business arrangements.
- limited reporting of out-of-hours arrangements.
- variable sampling programmes.
- inconsistent performance monitoring and reporting; and
- weaknesses in governance and review evidence.

The most significant opportunity for improvement across the sector is the consistent inclusion of quantified workload data, planned activity levels and performance outcomes. Strengthening these elements would improve transparency, support benchmarking and provide greater assurance that food law services are planned and delivered in accordance with Food Law Code requirements.