

CONSUMER ENGAGEMENT: SIX MONTHLY PROGRESS REPORT

Executive Summary

1. This paper describes the work undertaken to develop the consumer engagement strategy since the October 2007 Board Meeting. It proposes a broad outline and the draft Terms of Reference for the new Advisory Committee on Consumer Engagement.

Board Action Required

2. The Board is asked to:
 - **consider** the progress made on the new consumer engagement model.
 - **agree** the draft Terms of Reference for the Advisory Committee on Consumer Engagement.
 - **consider** whether future progress reports should be considered intersessionally.

COMMUNICATIONS DIVISION

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CONSUMER ENGAGEMENT: SIX MONTHLY PROGRESS REPORT**Background**

1. At its October 2006 meeting the Board agreed a new model for consumer engagement consisting of 3 main strands: engagement with individual consumers; engagement with consumer stakeholders and engagement with disadvantaged and vulnerable consumers.
2. It was also agreed that six monthly progress reports would be presented to the Board. This report is the first in the series of these reports and outlines the progress made on the 3 strands and on the Advisory Committee on Consumer Engagement. Whilst we haven't outlined all the work the Agency undertakes in the consumer area, the Board is asked to consider progress against our other activities such as the social and market research programme which includes the annual Consumer Attitudes Survey, our work with young people as part of the School Council Network, and our on-going work with community food initiatives etc¹.
3. The consumer engagement model is also part of the Agency's wider engagement strategy which includes our stakeholders and partners [i.e. industry, retailers, consumer groups, parliamentarians, local authorities etc] and is central to our aim of openness and transparency. Our work on the new salt campaign is a positive example of partnership working where we've worked with food manufacturers and retailers and consulted with consumer groups. We've also made funds available to civic society organisations, so that they can undertake specific salt awareness activity to support our current campaign.

Update on the New Consumer Engagement Model***Piloting Citizen's Forums on Food***

4. To strengthen our engagement with individual consumers [and building on our on-going quantitative and qualitative social and market research programme], the Board agreed that we should set up Citizen's Forums on Food. The forums will encourage the Agency to have a richer and more meaningful dialogue with the public and to create:
 - A feel for the public mood [i.e. finding out about the kinds of questions/comments that the public want to ask and make].

¹ Further information about all these initiatives can be obtained from the Consumer Branch.

- A forum for discussing a range of food issues with members of the public over a given period of time [i.e. a year].
5. We worked with Opinion Leader Research [OLR] to pilot 3 citizen’s forums, in Enfield near London, Irvine in Scotland and Port Talbot in Wales². The pilots were set up to help us establish what might work best in terms of approaches and techniques and to learn more about how we could involve policy colleagues in the debate and discussion. The table below summarises our approach.

Table 1

	Target Audience	Policy Issue
Enfield	Mixed demographic group – representative of local population	‘Scores on the Door’s food hygiene rating scheme
Port Talbot	Target audience group – parents of children under the age of 16	The use of, and risks associated with veterinary medicines
Irvine	Target audience group – aged 65+ and reliant on state pension	Access to healthy food

6. All three pilots explored consumers’ initial concerns about food, their awareness of organisations that might be responsible for food - more specifically awareness of the FSA and how we might engage with the public and suggestions for how these forums could be developed in the future. The main conclusions were that:
- The overall quality, standard and safety of food remains a concern.
 - Whilst most participants were aware of the existence of the FSA, few know about our exact role and responsibilities.
 - The majority of participants were very positive about the FSA engaging with consumers and were keen to develop an on-going relationship.
7. In terms of the lessons learnt for the Agency:
- Greater understanding about our role and remit will need to be created from the outset so participants know who they’re engaging with and why they’re engaging with us.
 - Mixed demographic groups work well as they allow people from different backgrounds to share ideas and experiences.

² These locations were chosen after extensive consultation with OLR/Demos and with colleagues in Scotland and Wales and after considering various socio-economic data sets.

- More time will be needed to discussing complex subjects such as the use of veterinary medicines.
8. The pilots demonstrated that we need to be clear about the purpose of the forums, i.e. that they shouldn't duplicate our existing consumer research but should be used at the beginning of the policy making cycle and for a simple reality check to see whether we are developing policies that fall within our remit and make sense to the public. This would enable the public to have their say and for the FSA to 'feel the pulse' of consumer opinion before policy is fully formed.
 9. We also need to remain flexible in our approach and try not to develop a single model. There may be times for example, when forums need to meet over a longer period of time to discuss complex issues and policy colleagues need to be on hand to hear what the public has to say and to answer questions. At other times, we may need to be in 'listening mode', and capture what the public is trying to tell us. That does not as Demos state,

"...necessarily mean sessions with a lack of structure; it might mean allowing that structure to be flexible and also partly determined, in content, by participants"³.
 10. We will consider all these issues when compiling the tender document to contract out the setting up and day-to-day management of the 8-12 forums that we intend to establish by the summer. The full reports from OLR and Demos are attached as part of the appendices.

Stakeholders

11. We continue to hold regular bilateral meetings with consumer and other stakeholders and with the appointment of our new Head of External Affairs, our stakeholder activities will be better co-ordinated and managed across the Agency. This along with our new stakeholder database and our web based tracking system for meetings will help to keep stakeholders and staff informed of key meetings and events.

Engagement with Disadvantaged and Vulnerable Groups

12. We have been piloting Action Research Studies in partnership with civic society organisations so that we can engage with consumers whose voices we may not capture through the traditional engagement routes and to make connections with community networks who are working with some of the UK's most disadvantaged and vulnerable consumers.

³ Reflections on the FSA public engagement pilots (Paper by Demos, March 2007).

13. So far we have:

- Undertaken work with Muslim and Afro-Caribbean groups to find out their views on the possible risks of atypical scrapie in sheep. We've targeted these groups specifically because their traditional diet is more likely to contain mutton and goat meat. We've also commissioned additional work with the Ethnic Minority Foundation, who are talking directly to Muslim women about their views on cooking and healthy eating.
- Funded work with Fairbridge [a charity working with excluded young people] to learn more about young people's relationship with food. Preliminary findings suggest that lack of knowledge about how to cook healthy meals, disruption in their personal [and in their families] lives and eating unhealthy food to make them 'feel better about themselves', fuels their often chaotic relationship with food.
- Working in partnership with Mencap to look at the food concerns of those with mild, moderate and severe learning needs. Focus groups with consumers living in sheltered accommodation and with carers of people with a learning disability [who are often responsible for preparing food] have taken place and findings are being shared with the team responsible for the Disability Equality Scheme.

14. The outcomes from all these studies will be fed back to the appropriate policy teams. We will continue to work closely with colleagues to identify other vulnerable groups whose views we need to take into account when developing policy.

Advisory Committee on Consumer Engagement

15. We commissioned an external consultant, Henry Brown from Westley Consulting Ltd to talk to Board members, external stakeholders and senior staff in the Agency about the scope, structure and possible membership of this Committee. He recommends that the Advisory Committee on Consumer Engagement should deal with the process of consumer engagement, as he states,

"... by which I understand the effectiveness of the interactions between FSA and consumers, and the extent to which the Agency listens to consumer views and gives them proper consideration. It is not meant to be another forum for discussion of the substance of consumer issues. Confusion between these two issues was one of the main problems with the old Consumer Committee, and it is essential to avoid repeating it"⁴.

⁴ Quality Assurance on the Process of Consumer Engagement (Report from Henry Brown, Westley Consulting Limited, February 2007)

16. The report also recommends that the Committee adopt the following Terms of Reference:

- Audit the Agency's day to day consumer engagement activities.
- Advise the FSA on best practice in consumer engagement, drawing on experience within the Agency and outside it.
- Provide expert guidance to the Board or executive on request on any other consumer engagement issues.
- Prepare and submit to the Board an annual report on the performance of consumer engagement covering the above issues.

17. The Board was keen to establish a committee that could provide some external challenge to our consumer work and where possible Henry Brown's report makes recommendations with the aim of being consistent, with the approach that the Board is taking in the areas of science and openness. It's unlikely therefore that the Committee will be a sub-committee of the Board, although the report does explore this as a possibility. We envisage that this Committee will be set up by December 2007⁵.

18. The Board is invited to agree the draft Terms of Reference for the Advisory Committee on Consumer Engagement.

Innovative Approaches

19. We continue to remain innovative in our approach to consumer engagement. As a result we are sharing information with other government departments and regulators, making use of new concepts to measure and understand consumer views, building in more horizon scanning events and helping to develop the capacity of the organisation to engage more effectively with consumers. Paragraphs 20-23 summarise our work to date.

Learning from OGDs⁶ and Regulators

20. We continue to meet with other regulators, public bodies and government departments to find out more about the public engagement work they're undertaking and to learn from best practice. More recently we've met with NICE, the Work Foundation and the General Medical Council and have spoken to colleagues at the Cabinet Office about the development of their own Citizen's Forums.

⁵ Henry Brown's full report is attached as part of the appendices.

⁶ Other Government Departments

Using Mathematical Concepts to understand more about Consumers' Views on Risk

21. We are working in partnership with the Health and Safety Laboratories [HSL] to understand more about consumers' changing perception of risk. HSL have developed a Risk Gauging Tool [RGT] to measure the perception of risk between different groups of consumers and to track changes over time. Psychometric questionnaires and focus groups are used to measure and track changes in consumer views and we're currently piloting a small piece of work with HSL and our veterinary medicines team.

Horizon Scanning

22. We are working in partnership with Demos on a horizon scanning project looking at future developments in science and the impact this might have on consumers. We're planning a roundtable discussion with senior staff in the Agency on 15th June 2007.

Building Capacity

23. To ensure that we continue to update our skills and to build capacity internally we have established a number of courses and volunteering opportunities for staff. We are also developing a 'How to Put the Consumer First' guide which will be available to all staff by June 2007. This guide will be a living document and it has been designed so that knowledge and understanding from engagement activities will compliment existing information.

24. The insight that is being developed from our engagement activities will be disseminated back to policy teams through a series of meetings with Divisional and Branch Heads. It has been recognised that this needs to take place early in the policy development cycle. We have been discussing our innovative activities with policy teams, the work piloted with HSL is now being considered as a tool to measure consumer perception of the associated risks in the policy area of Cloned Animals.

Board Action Required

25. The Board is asked to:

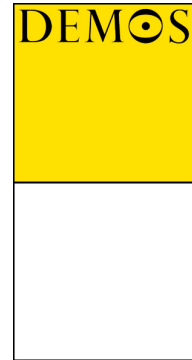
- **consider** the progress made on the new consumer engagement model.
- **agree** the draft Terms of Reference for the Advisory Committee on Consumer Engagement.
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DEMOS

Report

**Reflections on the Food Standards
Agency public engagement pilots**

20 March 2007



Purpose of our reflection

The purpose of this report is to reflect on the Food Standards Agency (FSA) public forums and focus groups. The FSA commissioned sessions from Opinion Leader Research (OLR) as part of an overarching commitment to reaching out to all the potential users of FSA services, particularly those with the lowest levels of engagement. Any initiative to connect with consumer groups will need to answer numerous difficult questions about the depth of engagement, formative and summative models of approaching work and a host of other dilemmas.

OLR's initial model has provided an excellent springboard for taking this sort of work forward in the future. For this reason, this report is largely forward looking - highlighting the lessons, both big and small, from the last three sessions, and considering the potential for increasing the scope of the work in the future.

As such this is not an evaluation of the technical process involved in running the groups. It is a chance to look at the brief for the design and operation of the forums themselves; at the aims and objectives of the engagement work; how they translate into a working guide for the groups; and how in turn the outcomes from the groups align with the goal of better engagement.

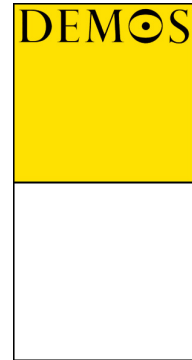
This report outlines the approach to the engagement process, the subsequent outputs and findings from the groups and some possible links to the strategic aims of the FSA. Our recommendations for the future are based on how to ensure forthcoming work better fulfils the need to engage with consumers of food in as inclusive and mutually-beneficial fashion as possible. We will be looking to answer the question of how appropriate these forums are for public engagement work, and how they can fit that purpose better in the long term.

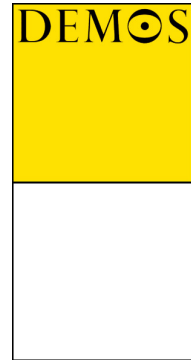
The wider context

This engagement work is one strand of the FSA's strategic goal to improve the decisions and regulations that determine the quality and standard of the food people decide to buy.

It sits in the context of a series of changes socially that have changed the pressures and attractions facing people when purchasing food. The FSA can not control what people eat or buy, but in terms of enabling people to choose a healthy diet, it has a series of recommendations for what people should avoid or try to eat more of. The FSA are ultimately interested in the moment of consumption. Instead of control, it looks to safeguard decisions through regulation and improve them through information.

There is a well-diagnosed societal trend towards individualism, and a contemporary political emphasis on the choices made by individuals. At the same time, authority and control have become complex concepts in terms of who holds them and how they are exercised. With that is an acute sensitivity about being told what is in our best interests (drawn out in the recent Kelloggs Optiva advert)ⁱ. One of the challenges for the engagement work is to address the difficulties some have in accessing and acting on information about healthier, better food. This report reflects partly on how appropriate these public forums or focus groups are in addressing these challenges.





Process and outcomes

Alongside the specific areas covered in each session, the general objectives for each of the pilots were:

- *To explore different methods of engaging with members of the public, to determine which are the most effective approaches;*
- *To assess the appropriateness of a 'citizen' approach;*
- *To gain a feel for the key concerns and questions consumers have with respect to food related issues;*
- *To understand what are the most important and relevant issues for FSA to engage with consumers about;*
- *To understand what are the most appropriate mechanisms for engaging with members of the public*

In observing the pilots, we were looking to four areas around which we would organise our reflections: participation, methodological approach, coherence and logistics.

Participation

The sessions for the large part drew enthusiastic and earnest engagement from those involved. Inevitably participants started slowly and warmed to the task and the potentially intimidating social situation, led by the facilitators' warm introductions that served as good ice-breakers. In particular, the introductory brain-storming session led neatly into the exploration of participants' concerns and worries.

That hints at the promising 'bonding' dynamic that emerged in the sessions between participants, who were eager to learn from each other. At times the sessions developed along these less structured lines before, appropriately for the brief, being pulled back towards the focus of the session's structure.

There were no overly-dominant members working to the detriment of others' involvement, despite there unsurprisingly being some participants more willing to voice their opinions. The quieter members tended to come out of their shells as the sessions drew on, although coincident with that was the rise in prominence, to some extent, of the louder members. Facilitators did well to monitor and respond to those emerging problems, however, through good management of group dynamics.

Notable dips in the level of participation occurred during the 'Awareness of the FSA' section, particularly in Port Talbot where people contributed less

than in other tasks. This was perhaps a result of the difficult subject matter – the unravelling of some complex relationships between authorities and the public, and of some complex policies and policy areas.

Similarly, in all three sessions people were keen to ask for expert advice and knowledge about the issues under discussion. As there was no expert advice available, participation was inevitably coloured and perhaps closed off at particular moments.

The participants proved to be highly critical consumers of media, and at the same time often critical of government attempts at providing information. There was not reticent to criticise the FSA, and it is worth considering the extent to which having an external facilitator contributed to that.

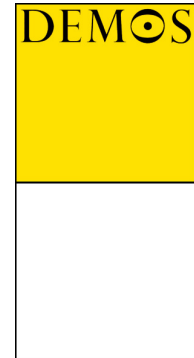
Methodological approach

Given the brief, the methodology was appropriate and well executed, but should be modified to satisfy the broader aims of FSA engagement. It was apparent that the nature of the pilots – exploratory test-cases – meant that the methodology could not be as developed as with a full programme of engagement. But the design of the pilots did provide wide and well thought-out scope to spot opportunities for future work.

The general attitude of the moderator was supportive, good humoured and gave the group a lot of feedback. That said, the terms of the sessions were set clearly and solely by OLR (with tasks defined and set by OLR). Indeed, one post-session comment in Enfield was that ‘it felt too controlled’.

The design of the process also meant that the moderator was in the position of deciding what got asked, which answers were appropriate, what was written up, what was recorded and so on. Ultimately, the result is a tangible sense that the meaning of the groups is interpreted elsewhere, and not by the participants. In turn, that could fuel the feeling amongst the participants that the engagement is something being done *to* rather than *with* them.

The presence of observers potentially sets up an unhelpful dynamic. Whilst they do not interfere with the group consciously, it did rather add to the sense that this was a process designed to gather the thoughts of the participants – or that it was instrumental for the FSA rather than worthwhile in itself for the members. For the aims of the pilots, however, it was



somewhat inevitable that observers were present, and their role was well explained by facilitators.

Some of the activities, although potentially enormously useful, could benefit from development and more thinking as to their purpose and consequence. For example, the food diaries in Glasgow are potentially a great asset and a useful resource for both parties. However, in their presentation they were not given a chance to fulfil that potential and were reduced to being an opportunity to describe the meals the participants had recently eaten. This was partly due to time constraints, but also was an indication that a more flexible structure could have facilitated a deeper conversation about food choices and what influences them.

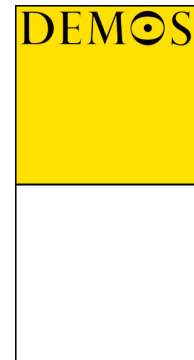
As already mentioned, there were many occasions on which questions were asked which couldn't be answered. Understandably, nobody present could answer the questions or respond to concerns that focused on technical expertise. This was perhaps most noticeable in the veterinary medicines presentation in Port Talbot, which was not given by an expert and hence was not as open to questions and clarifications as might have been ideal. People were expressing problems, but very little help was available in helping to articulate them or elucidate the specific areas of concern.

Participants noted that the groups served as formative experiences, most notably perhaps in Enfield in which the mixed demographic saw people feeding off each others' experiences and contributing advice.

Coherence

The process of and purpose of the groups were explained well, giving the participants a clear understanding at the start of what would emerge in the following session. As is mentioned elsewhere, however, the broader coherence of the sessions was difficult to articulate given that sessions were pilots. Participants were perhaps least clear on the broader purpose and consequence of the group, which inevitably colours the extent and nature of their involvement.

Some participants were unclear as to why they were chosen. There was perhaps too little explanation of the demographic make-up of the groups, with the focus instead on the FSA desire to talk to the public generally. That left participants, in Port Talbot most clearly, feeling that they were there for negative reasons – because they were “hard to reach” or inexpert. That was



less the case in Enfield and Glasgow, sessions in which the demographic was more easily identified.

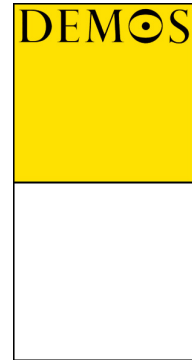
Only facilitators had session outlines, which meant that there was a reliance on the initial overview by the facilitators. It might have helped the coherence to distribute these more widely, as it could have served as a reference point at moments where clarity was lost or tasks were difficult to grasp.

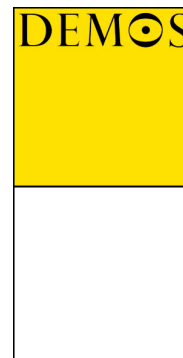
The lack of expert response to questioning had a detrimental effect on coherence. The groups often expressed uncertainty about their own knowledge, which could have been helped through guidance and grounding from a contributor with more specific understanding.

Logistics

There are some basics which were on the whole well covered in the sessions, but need to be considered going forward – ease of access, temperature and environment of the rooms, and having sufficient and appropriate food and drink for the participants. Space beyond the session room itself is useful as a place to talk before the event and during breaks.

The sessions were good on potential inclusion issues (such as reading out etc.) but there is perhaps mileage in using other media – an example of which was hinted at through the use of food diaries. They provided a good focal point for a grounded discussion on the choices people are making regarding their food. But, also as a point on coherence and methodology, they would be better served from being more integrated into the purpose and structure of the sessions.





Implications for the future

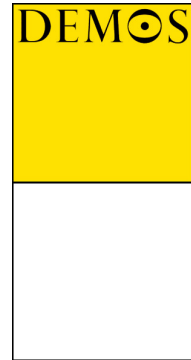
Many of the problems of the pilots were a result of them being as such - pilots. Given they were in a sense 'test' sessions, it would have been difficult to locate them too strictly within the FSA strategy, and it was wise to begin with an initial round of pilots followed by space for reflection.

The overarching conclusion is that the FSA's **future engagement work needs to be clearer, both internally and in describing the process to participants, about the intended role of the forums.** Consistently, participants asked: 'Will this make a difference?' They were most enthused at points where they felt their impact was clearest, and where they were comfortable with the consequences - for example, in Enfield they were more enthused by the Scores on the Doors evaluation once they were clear about what their purpose was. At times a 'them and us' dynamic was apparent - usually when the reasons behind the exercise were least clear. Combating that means moving away from an idea of focus groups as a point to gather opinion *from* the public, towards a model that values the sessions as an integrated, ongoing part of FSA work.

We also recommend that **engagement work focuses on the problems of authority and responsibility over the food we buy, eat, and feed to others.** One of the concerns emerging from the groups was this vague understanding of where responsibility and authority lies. This was clear in the discussions over awareness of the FSA - in which the participants face the challenges of some difficult policy language and ideas about exactly what role organisations and individuals play in ensuring safer food and a better diet. It is worth maintaining and developing the pilots' focus on awareness of the FSA, but this would need to take a less structured, investigative approach and move towards a formative model that developed participants' understanding.

Less top down, defined conversations

The sessions were fairly structured, and it was apparent that a less defined conversation, allowed to develop at the pace and along the lines defined by the participants, would facilitate a more useful conversation for both parties. Having the questions and problems framed by the participants would avoid what participants sometimes felt - that they are delivered problems to solve. Instead, it would breed a confidence in the idea that the FSA works to help consumers by working with the grain of the pressures and attitudes they have.



We recommend that future forums become more responsive to the pace and interests of participants. That does not necessarily mean sessions with a lack of structure; it might mean allowing that structure to be flexible and also partly determined, in content, by participants. There are a number of possible ways of achieving that.

Pre-material in terms of reading (perhaps information- or fact-sheets or an accessible article on a specific issue) or other media would help frame participants' understanding before the session. That would have two benefits – helping to base the groups on established shared knowledge and open up a potentially deeper conversation. Further, the lead-up to the sessions could involve drawing from participants the areas they wish to see covered.

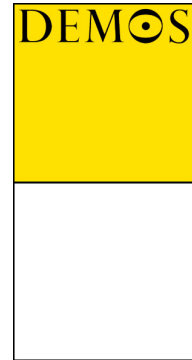
The inclusion of an expert on the issues being covered would help the session be responsive to the direction sought by the participants and to their concerns. On many occasions people had questions that the facilitator, naturally, could not answer. Similarly, the areas covered by the FSA's remit are so challenging that we should avoid the presumption that participants will be able to frame their questions or answers without expert help.

To take one example, a very productive period followed an intervention by an FSA observer in Glasgow, in which the specifics of the newspaper articles being discussed could be debated and explored in much richer detail. Well-used expert involvement would work to enhance the collaborative formative experience of the sessions, especially over any potential long-term series of sessions.

Building a community of interest

As mentioned above, a notable and promising outcome from the groups was the element of bonding between participants and a consequent enthusiasm that tended to develop through the course of the sessions. Because of the structured nature of the sessions, it was often subservient to the need to get through the process.

But allowing this social aspect to develop, as part of a longer term effort, could help ultimately to build interest, response and enthusiasm around the issues. This could be a useful resource for both the FSA and the participants themselves, and would be a primary means to maintain successful engagement through the forums.



Investigative or formative?

One of the primary notes for our conclusion is that focus groups should be meaningful in themselves, but also fit into the ongoing work of the FSA.

We suggest an approach that takes the groups as formative experiences for those involved – rather than as a means to just road-test FSA thinking or initiatives. Groups will become meaningful in themselves through being part of a bigger story; through being involved in an ongoing conversation which demonstrably will form part of what the FSA is striving to do. An element of that involves communicating to participants clearly that the FSA’s mind hasn’t already been made up, and how and why participants’ involvement will be of consequence.

Clarity of outcomes for participants

As suggested above, the initial groups, though being test cases and exploratory in nature, inevitably struggle to provide certainty of purpose or outcomes for those participating.

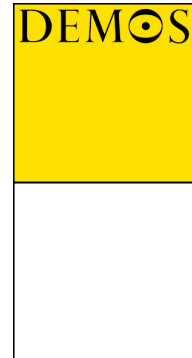
Taking the forums forward will require **clarity from the outset regarding the position of the groups in terms of both the decision making or operation of the FSA itself, and the FSA’s remit more broadly.**

Naming the strategy

The FSA as an organisation and the areas covered in its remit are two separate things - the FSA is designed to help improve the information available for choices of food and the regulation behind the production, distribution and sale of food to the public. There is a focus, rightly, very much on seeing the consumer as primary and their interests, pressures and opinions as central. That given, it is important to reflect the relationship the FSA has, or conceives of, with the public in naming the ‘engagement’ work. Public engagement or inclusion could suggest bringing the public ‘in’ to the FSA and in turn to the body that provides a better food industry.

But its role actually suggests more of partnership of responsibility with the public, albeit with the statutory onus for action placed on the FSA. **The name, in embodying the desired approach, should reflect the role the FSA hopes the public can play, both in interacting with the organisation and**

more broadly when consuming food - as active participants rather than test cases.



Website response and comment

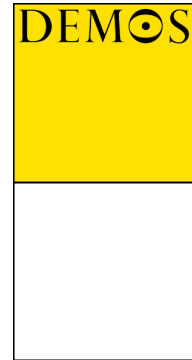
The FSA website is already a commendable element of its openness strategy. Extending that to incorporate the two-way, responsive and inclusive approach to engagement could be a means to maintain links to and interest from members of the forums, helping to build a community of interest around the FSA and food more generally. **We recommend presenting the findings from each group session on a section of the site followed by a response from the FSA.** The pilot sessions saw the material disappear with the facilitators, contributing somewhat to an unhelpful dynamic. It will be important to make the interpretation of the sessions as open as possible, and doing so would help to confirm the sense of formative conversation.

Further, opening that feedback section, and the website more generally, to comments and contributions from the public could help initiate two-way dialogue and develop a great resource for the FSA *and* the public in understanding food consumption and the pressures faced by consumers.

As mentioned, a theme emerging from the groups was the scepticism of the participants towards the press and media outlets. That extended toward the messages and information given by the government and its agencies - including the FSA. What this spoke of was an identifiable trend emerging from the groups: in general, a move from wanting to be *given* the right information towards increasingly wanting to be able to find it easily. One advantage of such an open website is that it provides a platform to communicate to people more directly in this way – laying out where people can find the information they want.

‘Tagging’ could be a useful tool here. Allowing the public to tag the information on the website would allow it to become grouped over time according to terms defined by the public. It could allow the public to assemble information from the website into ‘portfolios’ addressing particular issues, but also could become a means to understand how the public perceive particular problems and areas of concern. (It is worth pointing out that this could run alongside the established website as an additional tool rather than a replacement for the current ordering.)

Participants expressed a level of concern related to access – the extent to which there is equal access to the website and the benefits it affords. For these forums, linking elements of the website to the process of engagement would need to be aware of the limits of participants’ access. One remaining challenge is indeed to combine the communicative ability that the website affords with mass communication; the website is still a tool to communicate more effectively and, potentially, in a deeper way with the public – especially when combined with forums such as these - rather than a fix-all way to reach them.



Further brief points to consider

1. How can engagement in the form of these groups combat the association of choice with inequality?
2. Can this form of engagement build communities of interest that work to help create strategies that attend to the pressures faced by the public in choosing a better diet?
3. How far past improved information sharing can FSA engagement work go?

ⁱ Available at

http://www.visit4info.com/static/advert_pages/37616.cfm?back_page=advertiser_pages/KelloggsCerealRange.cfm (accessed 19 February 2007)



Food Standards Agency Consumer Forums on Food

A summary report by Opinion Leader for the
Food Standards Agency

March 2007



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1. Background and objectives

Following the FSA's Board Paper on a new Consumer Engagement Model (FSA Board Agenda Item 3.1, October 2006) the agency identified a need to proceed with a pilot of the Consumer Forums on Food described within that paper. The Forums were described as follows:

- 10 forums to be established in England, Scotland, Wales and Northern Ireland.
- Forums to include a broad cross section of the adult population of the UK.
- Forums will consist of 12 respondents (i.e. 120 all together) and would meet for 2 hours.
- They would meet at least three times a year, with the same respondents taking part in each wave.

The forums are being set up to allow the FSA to have a richer and more meaningful dialogue with the public. The forums will be flexible to allow the FSA to gain:

- A feel for the public mood and thinking and the kinds of questions that consumers want to ask
- A forum for debating specific food issues with members of the public

The approach needs to incorporate the thinking outlined in the Demos discussion paper appended to the FSA Board paper. This paper identified the need to access public knowledge in the form of questions, connections and suggestions. The paper raises the need to use innovative deliberative and ethnographic approaches to ensure that consumer engagement becomes a true dialogue between the FSA and the consumers that it serves. The paper also states that it will be important to harness new technologies and methods of engagement such as web-blogs and 'online communities' as the forums progress.

Opinion Leader was commissioned to design and run the pilot for the Consumer Forums on Food. The purpose of any pilot is to gather learning in order to reduce risk or uncertainty when developing the main programme of work. The pilot process was set up to enable us to reach a place where we can refine the approach for the main Consumer Forums on Food. In this case, the pilot exercise was specifically set up to:

- Test out how the forums might best work, exploring a range of topics and using a range of techniques to test which approaches create better engagement
- Test how best to involve policy colleagues from around the FSA in the consumer engagement process.

This report provides an evaluation of the processes and methods used in the pilot and summarises the key research findings from the subjects discussed. We also suggest ways in which the Consumer Forums on Food can be taken forward.

2. Our approach

A single pilot forum was held in England (Enfield), Scotland (Irvine) and Wales (Port Talbot). It was decided that a different approach would be taken in each location to enable us to assess the appropriateness of different recruitment criteria and discussion material. Whilst much of the discussion was the same across all groups, each group also discussed a specific policy issue. The table below summarises these differences for each group:

	Target audience	Policy issue discussed
Enfield	Mixed demographic group – representative of local population	'Scores on the Doors' food hygiene rating scheme
Port Talbot	Target audience group – parents of children under the age of 16	Veterinary medicines
Irvine	Target audience group – age 65+, reliant on state pension	Access to healthy food

2.1 Recruitment

- In Enfield we piloted a citizen approach, recruiting a group that was broadly representative of the local population, which would reflect a range of eating habits and attitudes towards food. Quotas were set, with reference to the 2001 census data for that area, to ensure that a representative mix was achieved. These quotas were based on a number of demographic factors such as:
 - Age
 - Gender
 - Social Class
 - Ethnic origin
- A homogeneous life stage group of parents with children under the age of 16 was recruited in Port Talbot.
- In Irvine, we also recruited a homogeneous life stage group of people over the age of 65 who are reliant on a state pension.
- The three areas were chosen to represent urban, sub-urban and semi-rural locations.
- All participants were recruited as being either wholly or partly responsible for buying food for their household.

2.2 Discussion agendas

- It was agreed with FSA that different discussion guides would be used with each group. This enabled us to get a feel for the subjects and techniques that create the best feeling of engagement with consumers. All groups followed the same basic discussion guide but around a third of each group was spent discussing a different issue of FSA policy concern.
- All groups explored the following:
 - Consumer concerns about food issues
 - Consumer awareness of who deals with food issues and awareness and knowledge of the FSA
 - Consumer perspectives on how FSA should engage with them in the future
 - Suggestions for taking the consumer forums forward

- In Enfield, participants discussed the Scores on the Doors food hygiene rating scheme, exploring their overall reactions to the scheme and their preferences for the specifics of the scheme e.g. rating scheme, name, logo.
- The Port Talbot group were introduced to the subject of veterinary medicines and discussed their thoughts and concerns surrounding this issue.
- Participants in Irvine focused on access to healthy food, discussing their eating habits, their perceptions of healthy food and the barriers they experience when trying to eat healthily.

3. Consumer food concerns

All discussion groups explored the concerns participants have about food. The aim of this was to gain some sense of the issues that are top of mind for consumers and what kinds of questions or worries they have in relation to food. Participants were first asked to think spontaneously about which issues they were most concerned about. They were then prompted to think about specific food related issues using news paper articles as stimulus.

3.1 What food issues are participants spontaneously concerned about?

- The overall quality, standard and safety of food is a key concern for most participants.

*If you buy a frozen chicken curry – is it nice chicken or is it reformed, pumped with water?(Port Talbot)
With meat, you don't always get the quality that you've paid or asked for (Irvine)*

- Food content/ingredients – many participants aren't clear about what goes into the food they eat and what levels are safe or healthy for them. This includes concerns around GM foods, fat, sugar and salt levels, and additives and chemicals in food.

My main concern is additives and not quite knowing what they stand for (Enfield)

- The nutritional value of food – guidance about what is and isn't 'healthy' is often experienced as confusing and perceived as frequently changing. A perceived lack of consistency in food labelling systems also increases confusion for some, a few of whom express a preference for the seemingly simplified FSA traffic lights system

The difficult thing is you don't know what some of the things are – they claim to be healthy but if you read [the label] properly they're not always healthy (Enfield)

- The diet of children and young people – many are concerned about rising levels of obesity in children and young people, and feel educating this audience and changing their eating habits should be a priority.

It's difficult – I try my best but my son can have a pretty bad diet as there are so many influences on them, especially advertising (Port Talbot)

- Trust in 'the Government' and food manufacturers – a few participants have low levels of trust in the Government and food manufactures when it comes to dealing with food issues and communicating information about food. Participants use 'the Government' in this context as an umbrella term to describe a range of government bodies, which can sometimes include the FSA, These participants question whether they are always told the truth about food content and the extent of food scares, when they occur by these government bodies and food manufacturers.

The Government gets money out of all these companies and they're going to lose out if the story gets out (Enfield)

3.2 Reactions to news stories

- Participants have a general awareness about most of the news stories used as stimulus but have low level awareness of the specificities of these issues.

- Bird flu, the Cadbury salmonella scare and the recent recall of Cadbury products because of the failure to use labels indicating that they may contain nuts, are stories participants had most spontaneous knowledge of.
- Many are aware of the issues around food labelling highlighted in the article about sugar and salt levels in cereal and commented that they found the inconsistency in labelling systems confusing.

It's so confusing which ones have got fat and sugar and all that in it (Port Talbot)

The traffic light system is good because I think at least you can just look at it and see what colour it is – I mean sometimes they can have all these figures on the side of the box and by the times you've read it you're in Tesco for hours (Port Talbot)

- Participants who looked at the GM rice story were completely unaware of this issue.

We've been eating banned rice and no one has informed us about it. I feed it to my kids and grandkids. I think that's horrible! (Irvine)

- The overall low level of awareness of the specificities of each of these issues made participants feel that they had somehow not been told the truth previously about these food stories and again raised questions about the levels of trust they could have in the Government and food manufacturers.
- With respect to GM rice, participants felt that there had been a total cover up as none had heard about this before.
- In terms of the bird flu, Cadbury and signposting articles there were real feelings that consumers were not always given the whole story about these issues because of the need to protect sales and revenue for manufacturers and the Government.

The politicians know and they're not telling us, the public. They're keeping it amongst themselves because we would stop buying it if we knew (Irvine)

- In general, participants are interested in food issues and have an appetite to learn more about these. However, participants stressed the need for stories relating to food to be communicated in a format that is accessible to all so that the details of specific stories are communicated effectively (i.e. not just appear in the Guardian)

I think more should be put on TV about these things because how many people read the Guardian. Like myself, I read the Sun and I just stick to that (Port Talbot)

4. Consumer understanding of the FSA

During the groups, we asked all participants who they felt were the people and organisations responsible for dealing with food related issues. Participants were first asked for their spontaneous views on this and, more specifically, for their spontaneous knowledge of the FSA. The FSA was then introduced to participants via a handout outlining the roles and responsibilities of the agency.

4.1 Spontaneous understanding of who deals with food issues

- Participants do not have a clear and consistent understanding of who is responsible for dealing with food issues and food scares when they occur.
- A variety of organisations are perceived as having some responsibility and role:
 - Food manufacturers and retailers
 - Central Government - various suggestions including the Ministry of Food, the Agricultural Commission, the Department for Fisheries and Food, DEFRA, Department of Health
 - Consumer organisations – Trading Standards, Which, Citizen's Advice Bureau, the Consumer Council
 - Departments responsible for health and safety - Environmental Health; Health and Safety Commission;
 - The European Union/Commission
 - Food Standards Agency

4.2 Knowledge and understanding of the FSA

- Whilst most participants are aware of the existence of the FSA, very few have even a very general awareness of its roles and responsibilities.
- Spontaneously, some feel that FSA performs a monitoring role to 'check up on' food standards and safety. Beyond this, the FSA is perceived as having some kind of enforcement role, with powers to take action against those responsible for food related problems e.g. closing down restaurants.

It does what it says on the tin! Checking that if it's supposed to be organic then it is, that it's fresh and everything (Port Talbot)

People don't bother with the food standards agency unless they have a [food] complaint (Irvine)

The have to monitor something to do with food.... They shut down restaurants (Enfield)

- Participants are not spontaneously aware of the work FSA carries out with respect to giving advice and information on diet and nutrition to consumers.
- In response to the handout about the FSA, participants were often surprised about the extent of the FSA's remit. They were positive about the powers it has and its role with respect to informing and educating consumers, although there was a sense that it wasn't performing very well in this respect as so few were aware of its activities in this area.

They're not informing the public enough are they (Enfield)

If the FSA can give advice to the public and government why did it take Jamie Oliver to bring our attention to school dinners then? (Port Talbot)

It's been going since 2000 and I can't think of anything which I've come across that the FSA has done (Port Talbot)

- The FSA is perceived as not performing terribly well with respect to its consumer focused role because:
 - Food labelling is still often experienced as confusing
 - Few, if any, participants were aware of FSA guidance with respect to specific food issues
 - None were aware of the FSA consumer website nor of any publicly available advice it might issue

5. Feedback on policy issues

5.1 Scores on the Doors (Enfield group)

Before introducing the idea of a food hygiene rating system, participants firstly discussed their eating out habits and preferences, and identified any concerns they had with respect to this. They were then given a handout outlining the food hygiene rating system (Scores on the Doors) and gave their spontaneous feedback on this. Participants were then split into small groups and asked to come up with their ideal food hygiene rating system, expressing their preferences for how the scheme should be designed and run.

- Participants are spontaneously concerned about hygiene standards in the restaurants they eat in and places they buy take away from. Currently, personal experience, word of mouth, media coverage of poor standards and whether an establishment looks clean are the things which influence participants' views on hygiene standards in restaurants and take aways.

If you find something in your food you won't go back there

If you read something in the local paper – maybe they were being investigated for cockroaches – that would put you off.

- All are positive towards a hygiene rating scheme for establishments that sell food. Many feel that a regular inspection and certification scheme would give them piece of mind that they were buying food from somewhere which had complied with hygiene standards.
- To have any real impact and effectiveness, participants feel that premises need to be inspected on a more regular basis, at least once a year.

Every 3 years, that's not enough.... The standards could slip in 3 years totally

- 'Hygiene Rated' is the preferred name for the scheme. Participants see the scheme as a pass/fail system – a restaurant either passes a hygiene inspection fully or it doesn't. Hygiene Rated very clearly says that an establishment has met *all* hygiene standards.
- 'Scores on the Doors' provides less clarity. It is not immediately evident that it is related to hygiene standards only and participants felt it could be interpreted as referring to the quality of the food or service.
- Participants also perceive 'Scores on the Doors' as relating to a rating system. This again makes less sense for participants as they don't believe there can be degrees of compliance with hygiene standards that a rating system, e.g. 1-5 stars, would seem to imply.

That might be misleading though 'Scores', it might mean how good the hospitality is. This is actually hygiene and nothing else.

It's a pass or fail; you're either good enough or you're not

- Participants prefer the hygiene rated logo overall for its simplicity and clarity. Many also feel that it is important to guard against forgeries by ensuring that the certificates are signed by an official and cannot be easily copied (e.g. have a hologram or stamp of authenticity).
- Overall, participants agree that the ideal hygiene rated scheme should:
 - have a pass/fail rating system

- have a signed certificate displayed in the window/door of the establishment
- be the same scheme throughout the country
- be applied to all outlets selling food
- be compulsory
- be promoted through the local TV, radio and press, along with leaflets and billboards alerting people to the scheme.

5.2 Veterinary Medicines (Port Talbot pilot)

Participants were asked for their spontaneous understanding of veterinary medicines and their associations with this phrase. A short presentation was given to outline some of the key issues around veterinary medicines, the risks and monitoring processes. The group then discussed their reactions to the presentation and what concerns and questions it raised for them.

- Participants do not have any real spontaneous awareness of what veterinary medicines are and were not aware of veterinary medicine residues in food as an issue. The short presentation about veterinary medicines raised a number of concerns and questions from participants.
- One of the main questions focused on how safe 'low' levels of veterinary medicines residues are for humans and whether they could be sure that even low levels don't present any risk to human health.

It says small quantities but I'm a big meat eater so for someone who doesn't eat meat very often they might be small but with me it could be sky high for all I know

We're being told it doesn't affect us but have there been trials done to say that over a long period of time there is no effect?

- Another focus for concern was around monitoring. Participants question whether *all* potentially affected products could *always* be checked and wanted to know what timescales were involved.

They say they monitor the people who provide cattle but how much meat does get into the food chain that hasn't been monitored?

How long do the results take to come through? Have we already eaten it by the time we've had the results?

- Some participants question veterinary medicines being used as a preventative measure. They want to know the rationale behind giving animals medicines which could get into the food chain when they aren't actually ill. People have further concerns about the effect of anti-biotics on the immune system and the potential for this to reduce the natural immunity of animals to fight disease.

The animals won't have any immune system if they're given these all the time. They'll rely on the anti-biotics and hormones and additives.

- Participants feel that this is an issue that consumers should be better informed about through advertising and the media. Most importantly they want to know, at the point of sale, that the food they buy is safe and suggest the use of stamps or seals of approval on products to indicate that they have passed monitoring standards.

We hardly knew about this when we can here tonight, so how many other people are in the dark. It's something people should be aware of definitely.

There should be a recognised stamp or something on food to say 'this is approved'.

- Discussing this issue raised questions and concerns that participants had not previously been worried about. When discussing complex issues, a deliberative approach is more suitable as this

enables participants to be presented with more information, allows them time to digest and discuss the issues and to have some of their questions answered.

5.3 Access to healthy food (Irvine pilot)

This group explored participants' general perceptions about what healthy food is and the barriers that prevent access to a healthier diet. We asked participants to keep a food diary for one week before the group. This was used to stimulate discussion and provide insight into the eating habits of this demographic. Participants were also presented with the healthy eating advice for older people that is available on the FSA website. This was explored through a 'hearts and minds' exercise where participants were asked to imagine that the advice was being given to them by a friend, doctor or partner and then asked to express what they would say, think and feel in response to this advice.

- Participants are very aware of healthy eating being a much talked about issue but think of it most frequently within the context of trying to improve the diet of children and young people.
- Fast food and processed foods, which children and young people are perceived as eating a great deal of, are considered 'unhealthy' foods. Participants feel that because they cook most of their meals from scratch that they generally eat more healthily than the younger generation.

People just cook tinned meals and buy things from the freezer in the shop and stick it in the microwave. Home cooking is much better I think.

- Overall, therefore, participants feel that they eat a somewhat healthy diet. Many know that they 'could do better' but relative to young people and children they feel that they belong to a generation that does eat more healthily.

I think it's changed because people have more money now. When my kids were wee I had to bring them up on porridge and soups and it's a pity it's no more.

- However, whilst participants feel that they eat a fairly balanced, healthy diet, their food diaries indicate that most diets are high in carbohydrates and meat products, low in fresh fruit and vegetables and frequently feature snacks high in fat, sugar and salt.
- Many feel that the healthy eating advice issued by FSA for older people sounds sensible and would be beneficial to their health. However, a number of barriers exist to achieving this:

- **Cultural barriers** – within the context of local culture and habits, the diet that most people eat is considered to be healthy but in reality it can often be unbalanced and lacking variety.
- **Knowledge barriers** - participants feel they receive mixed messages about what constitutes healthy food, with 'expert' advice seemingly changing from one week to the next. Lack of understanding about the meaning of some food labelling and ingredients compounds this confusion.

You try to look out for a healthy diet and the experts tell you one thing that's healthy eating and next time they tell you its not. So where do we go from there?

- **Psychological barriers** – most participants know that certain foods are better for them than others but their perception of healthy food is often that it is boring, dull and doesn't taste good. Others also know that they should be thinking about modifying their diet but put it off because they see it as limiting their enjoyment of life now.

*The stuff you're supposed to eat to get your weight off, you don't like. It doesn't taste good.
That's what's wrong because you eat the things that you like*

*This is what the doctor said 'you're overweight'
What I'm saying is 'maybe he's right'
What I'm feeling is 'I think I'll phone for a Chinese and start the diet next week'*

- **Financial barriers** – healthy food is experienced as more expensive to buy than other, less healthy food. For this group, who are reliant on state pensions for their income, good quality, fresh fish and meat and organic food, which people believe to be good for them, are too expensive to buy on a regular basis. Participants also feel that supermarkets don't cater for individuals or couples and that healthier food is cheaper to buy in bulk than it is in small quantities.

In supermarkets everything is pre-packed. I guarantee if you go for mince you won't get anything less than 500g

The organic stuff does have a better taste but you can't afford to go and buy an organic joint

You're fish is very expensive just now. It's healthy but it's a fortune

6. Participants' views on consumer engagement

The final section of the discussion explored participants' perceptions of the importance of FSA engaging with consumers and the benefits that both parties could derive from regular engagement. Participants also suggested ways in which the consumer forums could be taken forward. This enabled us to get a feel for the subjects and techniques that create the best feeling of engagement with consumers

- The majority of participants were very engaged when talking about food related issues. They expressed a genuine interest in the information that was given to them and were overall very interested in the subjects discussed.
- Many were positive towards the idea of FSA engaging with consumers on a regular basis in the future, with the view that consumer engagement would allow FSA to hear the views of different consumers. **It is worth noting, however, that participants were asked whether and how they thought FSA should engage with members of the public without knowing that FSA already undertakes a range of research activities with consumers.** Participant views on consumer engagement therefore need to be considered with this in mind.
- Participants feel that FSA is not very well known and that the forums could be used to raise its profile and educate consumers about the role of the FSA, what it is responsible for and, more specifically, the role it plays in advising and informing consumers about food related issues.
- Many also feel that the forums are important for helping FSA understand what concerns/questions consumers have with respect to food and to use these forums to answer questions. With this in mind, participants could see the benefit of engaging the same participants over a period of time to enable them to build their knowledge and have their questions addressed, creating more of an on-going dialogue.

You could pose different questions. We've come in here tonight not really knowing what's going on and [now] we're fired up with lots of questions (Port Talbot)

If you get different people you ask more or less the same thing again, whereas if you're using the same people you can progress from stage to stage (Irvine)

- Others however feel that the FSA would benefit more from hearing the range of views that are perceived to come from holding groups with different people each time

I think it would be a bit pointless meeting the same people. It's all the same opinions. You might get different opinions if you get different people (Irvine)

- Participants also feel there is some value in talking to both mixed demographic and target audience groups.

Have more varied age groups and cultures (Port Talbot)

A mixed number of people with differing opinions on a subject (Enfield)

Do discussions by family group and maybe younger ages (Port Talbot)

7. Lessons from the pilot experience

7.1 Mixed demographic v target audience groups

- Using a mixed demographic approach allows participants to engage with and learn from others who may have a different perspective from their own. This approach enables a range of eating habits and attitudes towards food to be represented in one group.
- In this way, a mixed demographic, citizen based approach creates a space for knowledge sharing between participants, and between FSA and participants.

Involve different cultures because a West Indian diet on the whole is much better than ours and they can share their knowledge in a forum like this and open people's eyes. (Port Talbot)

- Recruiting a single target audience can give insight into the concerns and questions of a specific group.
- Groups which use this approach are often perceived by participants as vehicles for FSA to educate and inform a specific target audience. Where this is the case, FSA then has an ethical responsibility to ensure participant questions and concerns are addressed.

The FSA should have discussions with younger people, with the children and help them learn about food, explain to the younger ones before they get too old and set in their ways. (Port Talbot)

7.2 Format

- The location of the pilot forums presented no barriers to recruitment. Holding forums in locations smaller than Irvine could prove to be logistically more difficult in future.
- In terms of what time of day the group is held, it is harder to maintain engagement for much longer than 2 hours if groups are held in the evening, when participants are likely to have come from a day at work or looking after a family. If longer groups are to be held, these need to take place earlier in the day.
- This could, however, limit the pool of potential participants and FSA would need to consider who would be excluded. Day time groups would also need to offer a greater incentive to encourage working people to take part.
- The evaluation questionnaires indicated that there is an appetite for longer and further discussion, as 38% of participants agreed that there was not enough time to discuss fully all the issues. This is probably an indication that participants felt they did not have enough time to discuss specific issues that were of importance to them within the context of a group which covered quite a wide range of different issues.
- There is scope therefore for holding extended groups or workshops providing the format and timing are carefully considered. For example, where a more complex subject, such as veterinary medicines, is being discussed, more time and a more deliberative approach will be required to allow participants to engage with all the information surrounding this issue. Where this is the case, we suggest that the group is held earlier in the day to ensure that participants were able to remain engaged throughout.

7.3 Content - general

- Discussing food concerns was a very accessible subject for all participants and facilitated a high energy, enjoyable discussion. This section of the discussion gave insight into consumers' top of mind concerns and questions with respect to food.

- The different news stories proved to be effective tools for stimulating discussion. They also helped identify where there were gaps in participants' knowledge about specific food issues. However, some of the issues had only been covered by broadsheet newspapers and were often outside of participants' cultural experience.
- Where new issues were introduced to participants via the news stories, these often gave rise to more questions than the articles answered. In future, questions, misinformation and myths arising in response to news stories would need to be carefully managed in the group.
- There was very little awareness about the role of the FSA. The handout helped clarify and increase participant understanding of FSA's roles and responsibilities. Increasing participants' understanding of the FSA will be important in future forums. It is not possible to attempt to establish a dialogue without first clarifying *who* participants are engaging with and *why*.

7.4 Content – issue specific

- 'Score on the Doors' and access to healthy food were easy subjects for participants to engage with. Food hygiene and healthy eating were issues many raised spontaneously in discussions. This is a good example of how existing awareness of issues can help participants engage with certain issues at a deeper level, in a shorter space of time.
- Veterinary medicines was a harder subject for people to engage with as they had very little existing knowledge of this. The subject raised many questions and concerns and indicated that a more deliberative approach is appropriate when discussing more complex subjects. Participants need to have adequate information and time to fully explore the issues and need an opportunity to have their questions answered.

7.5 Participant feedback

- Overall, participants were very positive about their experience of taking part in the discussions.
 - 92% were either very or quite satisfied with the group
 - 94% found the group interesting
 - All agreed that they enjoyed taking part
- The majority agreed that the information they were given was clear, fair and balanced indicating that the materials and handouts used were accessible for most.
- Nearly all participants felt that everyone was encouraged to have their say.
- 32 out of the 37 total participants said they would be happy to take part in future similar forums
- In terms of who should take part, participants could see the value in both mixed demographic and target audience groups.

Do healthy eating discussions with family groups or maybe younger ages (Port Talbot)

A mixed number of people with differing opinions on a subject (Enfield)

- Some felt that there were benefits to having continuous discussions with the same people, to enable them to build up their knowledge and have their questions answered.

If you get different people you're more or less asking the same thing again, whereas if you're using the same people you can progress from stage to stage (Irvine)

- Others thought that there would be a better breadth of opinion represented if groups were held with different people each time

I think it would be a bit pointless meeting the same people. It's all the same opinions. You might get different opinions if you get different people (Irvine)

8. Conclusions and ways forward

8.1 Conclusions

- The pilot forums indicated that consumers have a real appetite for discussing food issues and are keen to learn more about, and have a relationship with, the FSA. It is evident that participants have an interest in food issues which makes dialogue with the public straightforward. However, the pilot has indicated that there are a number of issues which the FSA will need to consider going forward.
- In taking the consumer forums forward, a careful balance needs to be struck between raising questions, answering them and FSA taking on an 'educator' role. Participants need to be provided with enough information to ensure that their questions/concerns can be answered.
- Providing enough information to satisfy the public has implications for:
 - What is discussed
 - Who it is discussed with
 - How often discussions take place
- Crucially, the CFFs need to have a clear overall purpose – is the objective to acquire new knowledge (research) or is it to have a relationship with the public (engagement)? How will this add to or compliment existing work?
- In terms of achieving the overall objectives, there is not one method that will adequately fulfil all of these. In trying to create one approach that 'does everything' we risk not meeting any of the objectives fully. It is likely that the model that the FSA uses will need to be flexible and reviewed to ensure it is always fit for purpose.
- The overall approach therefore needs to include method options depending on the purpose of the research.
 - Establishing a dialogue, for example, would be best achieved via a programme of continuous discussion groups held with the same people, which allows knowledge to be built and questions answered over time. There is also some scope here for debating specific food issues.
 - 'Reality checking' consumer views on FSA policy could also be facilitated through the forums. This would not replace the research programme FSA already undertakes into specific policy issues but could enable senior policy teams to quickly check the views of consumers on key issues and developments. One way participants could become involved in this is online, in between the forums.

8.2 Good Practice:

Whichever method is used, there are a number of 'rules' for good practice that should be borne in mind:

- At least 2 groups should always be held to allow for comparison. This is especially important if debating a specific food issue, otherwise there is a risk of only gaining responses from what may be a 'rogue group'.
- Avoid the temptation to cover everything in one session. Trying to meet all of the objectives within one group could mean that few of them are addressed well.

- Specific food issues to be debated with the public must require little information and raise few detailed questions. If more complex and less well known issues are to be discussed, a more deliberative approach e.g. workshop or Citizen's Jury, would be more effective for engaging the public, allowing time to fully inform them and debate the issues.
- Participants' expectations about what their role is and what feedback/action they can expect from FSA need to be carefully managed up front.

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ACKNOWLEDGEMENTS

I interviewed many people in the course of this project: FSA staff, Board members and outside stakeholders, and am very grateful for the time and information they made available to me. This report could not have been written without their help, but I take responsibility for the conclusions and recommendations set out in it.

EXECUTIVE SUMMARY

- i. Westley Consulting Limited carried out this study for the Food Standards Agency's Consumer Branch between November 2006 and February 2007. The task was to work up a detailed model for the Advisory Committee on Consumer Engagement (ACCE), which the Board had decided to establish at its October 2006 meeting.
- ii. The object of the ACCE is to provide the Board with quality assurance about the Agency's process of consumer engagement. The initiative is part of a wider policy of strengthening the Board's work on FSA governance and accountability.
- iii. The project involved research into the Agency's previous and current consumer engagement activities; clarification of what is meant by the process of engagement; a search for similar scrutiny functions elsewhere; development of a model for the ACCE; and interviews with Agency Board members, staff in London and the SWANI offices, and consumer stakeholders to seek their views and support for the model. Those interviewed were very largely in favour of the model.
- iv. This report recommends that the remit of the ACCE (paragraph 32) should be to:
 - § audit the Agency's day to day consumer engagement activities;
 - § advise the FSA on best practice in consumer engagement, drawing on experience within the Agency and outside it;
 - § provide expert guidance to the Board or executive on request on any other consumer engagement issues;
 - § prepare and submit to the Board an annual report on the performance of consumer engagement covering the above issues.
- v. The Agency should draw up a one-side checklist of best practice principles on consumer engagement (paragraph 41 and Annex 3).
- vi. Managers in the Agency should make a simple self-monitoring return of the performance in their area against the checklist (paragraph 43 and Annex 4).
- vii. Consumer Branch should amalgamate these returns, and exercise internal challenge if performance is below expectations or information is incomplete. The compilation will be the first strand of input to the ACCE (paragraphs 43-44).
- viii. The committee should be able to call on Agency managers to give evidence to it on an ad hoc basis (paragraph 45).
- ix. It should also be able to take evidence from outside organisations (paragraph 46).
- x. The last strand of input to the ACCE should come from its own horizon-scanning for innovative approaches to engagement, in this country or abroad (paragraph 47).

- xi. The outputs from the committee (paragraphs 49-52) should be:
 - § a short headline statement, commenting on whether the Agency's performance is up to expectations or not;
 - § a detailed commentary on the information it had reviewed;
 - § ad hoc advice in response to any requests from the executive or Board;
 - § an authoritative annual report, including recommendations based on the horizon-scanning.
- xii. The committee should be a group of around 8-10, composed of specialists on process, consumer issues and engagement, together with lay members (paragraph 55-57).
- xiii. The secretariat should be provided from within Consumer Branch (paragraph 65).
- xiv. The Director of Communications should take the lead on encouraging managers around the Agency to follow the best practice principles (paragraph 68).
- xv. Learning & Development Branch should discuss with Consumer Branch how best to set up specific training in engagement with consumers (paragraph 72).
- xvi. There are likely to be resource implications, particularly in Consumer Branch (paragraph 74).
- xvii. The new arrangements should be evaluated after 2-3 years (paragraph 76).
- xviii. Consumer Branch should consider with Performance Management Branch the practicality of introducing a Management Information System return on consumer engagement (paragraph 81).
- xix. Those interviewed recognised that there was a link between ACCE and the Social Sciences Research Committee, but did not think that this caused any problem of overlap (paragraph 87).

INTRODUCTION AND BACKGROUND

1. Consumer Branch of the Food Standards Agency asked me in November 2006 to examine the Board's decision at its open meeting on 12 October 2006¹ to set up an Advisory Committee on Consumer Engagement (ACCE), and to work up a detailed model. At this meeting the Board had discussed a paper on consumer engagement² and had reached the following conclusions³:

- § To set up a series of Citizens' Forums on Food to facilitate direct engagement with individual consumers;
- § To note the appointment of a new Head of External Affairs to act as a lead contact across all issues for key stakeholders;
- § To carry out research to identify the groups that the Agency may not hear through its existing engagement processes, and , and establish how best to engage with them;
- § To set up an Advisory Committee on Consumer Engagement to assure the Board on the quality of its consumer engagement;
- § To set up a Social Sciences Research Committee to provide the Board with assurance and independent challenge in the social science field equivalent to that provided by the nine scientific advisory committees.

2. I was asked to press on with this work and report by February 2007 as the Board regarded it as a matter of urgency.

3. After I had begun work, Consumer Branch also asked me to examine the relationship between the new ACCE and the Social Sciences Research Committee, and to check that there was no problem of overlap between the two initiatives.

A.1. Wider context – openness and the governance of science

4. The Chair explained to me that the Board's decision on ACCE has to be seen in the wider context of its interest in strengthening governance and accountability of Agency operations. Two other key areas are being developed.

5. The Board's concern about consumer engagement stems from the core value set out in the Strategic Plan 2005-2010⁴ '**to put the consumer first**'. This is so far the Agency's guiding principle as to be paraphrased as the subtitle of the Strategic Plan.

¹ <http://www.flyonthewall.com/FlyBroadcast/FSA/BelfastBoard1006/>

² <http://www.food.gov.uk/multimedia/pdfs/fsa061004.pdf> and <http://www.food.gov.uk/multimedia/pdfs/fsa061004b.pdf>

³ <http://www.food.gov.uk/multimedia/pdfs/boardmin12oct06.pdf>

⁴ <http://www.food.gov.uk/multimedia/pdfs/stratplan0510.pdf>

The other core values in the Strategic Plan are ***'to be open and accessible'*** and ***'to be an independent voice'***. It is plain that these values are closely connected and that they were set down to differentiate the Agency's approach from what were seen as the mistakes of the past exemplified in the handling of the BSE crisis.

6. The Board discussed **its approach towards openness** at the open meeting on 15 February 2007. The key question in this field is whether the FSA has lived up to the hopes and expectations with which it was founded, and whether it can improve its performance on openness so that the trust and goodwill it has built up is not eroded. Openness and consumer engagement are closely related, and it will be hard to succeed on either front without making similar progress on the other.

7. The Strategic Plan makes clear that the Agency bases its policies on the best available evidence and (pursuing the principle of openness) explains what this is. A paper on the governance of science agreed at the Board meeting on 9 February 2006⁵ described the arrangements for ensuring that decisions are based on the best scientific evidence and sound analysis, and made proposals for strengthening them further. The paper's key proposals were:

§ a definition of the governance of science as ***'the methods by which the Board assures itself that scientific evidence is being identified, obtained, interpreted, used and communicated appropriately and effectively by the FSA'***.

§ a **Science Checklist** of key principles that the Agency should work to in the risk assessment process.

§ a redefined role for the FSA Chief Scientist to act as the **champion for science** within the executive, and to provide **reassurance to the Board** on the integrity of the processes by which the FSA gathers scientific evidence.

8. The Board discussed the Scientific Advisory Committees at its open meeting on 15 February and agreed to set up a new General Advisory Committee on Science to provide independent cross-cutting scientific advice, and **an independent check on the Agency's processes for governance of science**, and that the existing Advisory Committee on Research should be disbanded.

9. I have drawn up the recommendations in this report with the aim of being consistent, as far as possible, with the approach that the Board is taking in the areas of science and openness.

⁵ <http://www.food.gov.uk/multimedia/pdfs/fsa060207.pdf>

A.2. Methodology

10. The Board paper proposing establishment of the ACCE noted that

'It's vital that our work with consumers is as rigorous and robust as our scientific work and that there is some independent external challenge to the work we do. For our science based work, this external challenge is provided through the 9 scientific advisory committees that provide independent assurance to the Board...we suggest that the Board now considers setting up a similar independent 'audit mechanism' to advise on all consumer issues.'

11. In considering detailed arrangements for the ACCE, I have sought to clarify the following questions:

- § what do we mean by the process of consumer engagement?
- § how can 'quality assurance' or 'audit' be provided?
- § what internal arrangements are needed to support the ACCE?
- § what information inputs does the ACCE need?
- § what outputs should the ACCE make? And to whom?
- § what should the structure and membership be?

12. I examined the different kinds of consumer engagement practised in the Agency, and studied previous Board papers and the Dean report on the approach towards this subject. In particular, I looked at the history of the previous Consumer Committee, which was wound up at the end of 2005, and whose remit covered somewhat similar ground to the ACCE. This helped me to reach an early agreement with Jaz Bangar, Head of Consumer Branch, on exactly what we thought the Board was seeking from the new arrangements.

13. I looked for similar scrutiny functions elsewhere in the Agency and in outside organisations to see whether working mechanisms could be replicated for ACCE.

14. With the advice of Consumer Branch, I approached and interviewed some two dozen individuals with an interest in consumer engagement: managers in the Agency, including its Scotland, Wales and Northern Ireland offices, Board members and outside stakeholders. These are listed at Annex 1.

15. For the early interviews, I started with a broad outline of the possible arrangements for ACCE, and progressively refined them as the process went forward. I also asked the interviewees whether they thought there was any problem of overlap with the Social Science Research Committee.

16. By the end of the interviews I believe I have arrived at a workable model which has the broad support of FSA staff, Board members and outside stakeholders.

17. An internal check on the quality of this report was provided through discussion with my colleague Nikki Pearson, who was otherwise not involved in the project.

A.3. The old Consumer Committee

18. This committee was set up by the Board in 2002. Its terms of reference were to:

- § alert the Agency to key issues of consumer concern;
- § comment on the Agency's strategic objectives and forward plan;
- § provide the Agency with feedback on the effectiveness of its policies in responding to consumer concerns;
- § advise on consumer consultation methodologies, including ways of reaching vulnerable and hard to reach groups, and on the value of consumer research;
- § review the work of consumer representatives on advisory committees;
- § facilitate joint working between the Agency and consumer groups;
- § offer advice on any other issues that may be referred to it by the Agency.

19. The committee had 12 members, six appointed by national consumer organisations, and six independents appointed through the public appointments process under Nolan principles. It met four times a year.

20. Despite the hard work put in by the members of the committee, and by Agency officials supporting it, there seems to have been a feeling from the early days that this approach was not right. The arrangements were reviewed by consultants in 2005⁶, and the Board decided in December 2005⁷ to discontinue it. The main concerns were:

- § uncertainty as to who the committee actually represented;
- § an imbalance between the 'organisational' and 'independent' members, with the latter at a practical disadvantage;

⁶ Review of the Consumer Committee carried out by consultants Alan Pickstock and Jim Bewsher in March 2005.

⁷

<http://www.food.gov.uk/aboutus/ourboard/boardmeetings/boardmeetings2005/boardmeeting120805/minutes8dec05>

- § a feeling by Agency officials that the committee spent too much time arguing over the merits of recent policy decisions, rather than strengthening consumer engagement;
- § a perceived lack of feedback from the Agency on the committee's recommendations.

21. It also seems to me that the old committee's remit was too broad. The Board had sought to bring together all the 'consumer issues' in one place, and in practice this proved to be an unworkable agenda. As a result, the committee's outputs were not taken seriously enough, and the opportunity to strengthen consumer engagement was missed. In establishing the new Advisory Committee we should learn from this experience and avoid trying to reconcile too many overlapping objectives. The ACCE will be more effective if focuses clearly and unambiguously on the process of consumer engagement.

A.4. The process of consumer engagement

22. It is clear to me from discussions with Agency staff and Board members that the ACCE is to deal with the **process** of consumer engagement, by which I understand the effectiveness of the interactions between FSA and consumers, and the extent to which the Agency listens to consumer views and gives them proper consideration. It is not meant to be another forum for discussion of the **substance** of consumer issues. Confusion between these two issues was one of the main problems with the old Consumer Committee, and it is essential to avoid repeating it. I have taken particular care to emphasise this point in my interviews, and I believe it is fully understood and accepted by everyone I spoke to.

23. I don't see this focus on process as a limitation. On the contrary, I suspect there is more than enough to do on this front and that ensuring it is done well will be quite a significant challenge for the ACCE and the Agency.

24. To clarify what is meant by consumer engagement I asked some of the managers I interviewed to give me information about the engagement in their areas, and I have summarised a range of examples of this engagement in Annex 2. This is not intended to be comprehensive, more an illustration of the range of different approaches currently used, plus an indication whether or not they involve direct engagement with ordinary consumers.

25. In order to develop the quality assurance, I set out to identify the different aspects of performance that would need to be assessed. This involved reviewing previous Board papers on consumer engagement and the work of the Consumer Committee⁸,

⁸ eg the third annual report, <http://www.food.gov.uk/multimedia/pdfs/conscomannrep0304.pdf>

looking at the approach of other regulators, eg Ofcom⁹ and the Financial Services Authority¹⁰, and talking to consumer stakeholders. This enabled me to draft a straightforward list of headings and explanations of the process:

The process of consumer engagement: aspects of performance	
Aspect	Explanation
Quality of engagement	<p>Are we asking the right questions, in the right way, early enough in the process?</p> <p>Are consumers given the chance to put their own view of the subject?</p> <p>Are approaches tailored to different groups of consumers?</p> <p>Are consumers given a chance to influence all the issues on which decisions are likely to be taken?</p>
Extent of engagement	<p>Are we capturing the views of people particularly affected by the issue?</p> <p>Are we capturing the views of ordinary consumers, as well as organisations?</p> <p>Are consumers given the chance of a face-to-face meeting?</p>
Due consideration	Are all consumer views and representations logged?
	Are they individually considered before decisions are taken?
Feedback	Is a detailed explanation drawn up of the reasons for the decisions reached?
	Is this explanation communicated to interested consumers?
Continuous improvement	Are lessons learned as part of each piece of work?
	Are the lessons communicated to others in the Agency?

26. In the light of the points made to me in the interviews, I have refined these points into a checklist of best practice principles on consumer engagement (Annex 3).

⁹ eg the Memorandum of Understanding between the Ofcom Consumer Panel and Ofcom, <http://www.ofcomconsumerpanel.org.uk/mou.htm>

¹⁰ eg the Financial Services Consumer Panel, <http://www.fs-cp.org.uk/>

B. PROPOSALS FOR THE ADVISORY COMMITTEE ON CONSUMER ENGAGEMENT

B.1. Objectives

27. The headline objective of the ACCE is to provide the Board with quality assurance about the process of consumer engagement.

28. When the Board discussed the proposal, several members commented on the need to inject a serious challenge, and to avoid giving simply a bland reassurance on the work of the executive. I have therefore aimed to propose a system that will review in detail the engagement with consumers, and provide internal and external challenge on the effectiveness of performance.

29. At the meeting in October 2006 a number of Board members also made clear that they thought the ACCE needed to be able to reassure the Board that the executive was engaging directly with ordinary consumers. This is an important issue, but it is not a simple one. The Agency does have direct engagement activities, and is planning more, for example:

§ the Dame Sheila McKechnie award and the Awards for Food Action Locally in Wales enable staff to work closely with community food initiatives and to discuss and understand the needs of ordinary consumers;

§ the FSA offices in Scotland, Northern Ireland and Wales are inevitably closer to the grassroots than the London office, and find it easier to meet and talk to local food workers and consumers;

§ Consumer Branch has organised 'You speak, we listen' events, encourages opportunities for senior staff to spend time with community food initiatives, and is currently setting up the Citizens' Forums on Food, which will permit a structured discussion with consumers.

30. Examples of current consumer engagement are set out in Annex 2. As far as I can see, the bulk of the Agency's current work on consumer engagement is carried out indirectly. This is partly because it is practical to deal with organisations such as the National Consumer Council, Sustain or Which? who claim to be broadly-based or with more specific bodies such as Help the Aged or Diabetes UK, who can 'represent' particular groups of consumers in which the Agency is interested. It is also partly because much of the Agency's survey and focus group work is carried out by third parties such as market and social research companies, who have the professional competence and experience required.

31. In my view the new strategy on consumer engagement should provide encouragement for Agency staff to develop ways of dealing direct with ordinary consumers. Over time I would expect the proportion of direct engagement work to increase. But it is neither practical nor desirable to give up or substitute for the

existing indirect methods, so the ACCE will need to address both indirect and direct methods of engagement.

B.2. Remit

32. I recommend that the remit of the committee should be to:

§ Audit the Agency's day-to-day consumer engagement activities (direct & indirect):

- Quality of engagement
- Extent of engagement
- Due consideration of consumer views
- Feedback to consumers
- Continuous improvement

§ Advise the FSA on best practice in consumer engagement, drawing on experience within the Agency and outside it.

§ Provide expert guidance to the Board or executive on request on any other consumer engagement issues.

§ Prepare and submit to the Board an annual report on the performance of consumer engagement covering the above matters.

33. I believe that the audit role is what the Board had in mind in agreeing to establish the ACCE. The committee will need to have information on recent consumer engagement, and will be required to form a view on its effectiveness.

34. I think that audit needs to be coupled with horizon scanning for best practice on consumer engagement. Some Board members have expressed concern as to whether the FSA is still at the leading edge of organisations involved with consumers, as it was when it was founded. The Agency needs advice on best practice and encouragement to follow it.

35. It is normal for the executive to seek expert advice from its scientific advisory committees, and the Board also asks them to look at issues on an ad hoc basis. It would be entirely consistent for the Agency to seek guidance from ACCE as necessary on consumer engagement matters. Some units of the Agency told me they thought this would be useful, while others felt confident about their existing engagement methods. I think that more staff will be willing to seek its advice if the committee can show that it is able to add value by identifying useful new approaches.

36. I believe that the ACCE should produce an authoritative annual report. The Board will almost certainly wish to discuss this with the committee Chair, and an annual occasion would fit in with their timetable. This does not prevent the committee from providing responses to urgent questions more quickly, if the Board or executive ask it to do so.

B.3. Information inputs

37. In order to carry out its external challenge role effectively, I think that the ACCE needs to have information from both internal and external sources.

38. Although the Board's decision was simply to appoint an advisory committee, I don't think a committee meeting a couple of times a year can be expected to make a meaningful assessment of consumer engagement across the whole Agency without an internal system to prepare the way. The ACCE's role will then be to oversee this system and, with the information gained, to assess the effectiveness of the Agency's engagement. I described the following proposals in increasing detail as I carried out the interviews, and asked people whether they thought they were workable. I got a very positive response, and believe the model is practical.

39. The internal arrangements should promote best practice on consumer engagement, marshal information on the Agency's recent performance, and provide a first level of internal challenge.

40. They need to be based on an agreed understanding of best practice in consumer engagement. As practice develops, I would expect this understanding to evolve in accordance with the Deputy Chair's comment at the October 2006 Board meeting: ***'This is a journey, not a destination. There's not going to be a moment at which we say we're doing it properly now.'*** Nevertheless, I think that at any given time it ought to be possible to say what we believe the best practice to be.

41. I recommend that the Agency should draw up a simple checklist of best practice principles for consumer engagement. I have in mind a one-side list of bullet points, rather than a twenty-page manual, so that managers in all areas can easily grasp what is expected. Consumer Branch could consult colleagues on the terms of this checklist, and it would also probably be useful to get the views of outside stakeholders. My first draft of this document is set out at Annex 3.

42. Managers should be asked to make a quarterly return of the performance in their area against the best practice principles. All operative units dealing with consumers or consumer stakeholders should make this return, and I think that the most appropriate management level in London would be Head of Division. This may have to be varied according to circumstances, eg for the SWANI offices and for other operative units like Consumer Branch itself. It is very important that the return should not be seen as a time-consuming burden, but as an exercise that is relevant to managers' work and is simple to fill in. Consumer Branch will again wish to consult colleagues on the detail, but I set out a first draft of the form at Annex 4.

43. The returns should be sent to Consumer Branch, who should carry out an initial review against the best practice principles. Where performance does not meet expectations or the information is incomplete, CB should contact the manager concerned and discuss what remedial action he/she is taking. This internal challenge should be seen as an automatic management check, not as any kind of complaint or reprimand.

44. Consumer Branch will then amalgamate the returns and submit them to the ACCE, together with information gained through the internal challenge process. This will form the first strand of the information on which the committee will make its assessment.

45. The committee should have the right to call on Agency managers to give evidence to it on an ad hoc basis. It might ask to see managers who had handled particularly interesting or difficult issues, and it might speak to others in quieter areas on a random basis. This is the second strand of input.

46. For the third strand, the ACCE should be able to take evidence from outside organisations, either at the committee's initiative, or volunteered by them. It seems quite likely that stakeholder bodies in the consumer field will want to make their views known on the Agency's consumer engagement performance, though they may need reminding that the committee's remit is to look at the process of engagement, not the substance of recent FSA decisions.

47. The fourth information input should consist of horizon-scanning by the committee itself for innovative approaches to consumer engagement, whether in the public, private or NGO sector, in the UK or in other countries.

B.4. Outputs

48. I think that the ACCE should produce four kinds of output in its annual report to the Board, and as necessary in more specific ad hoc pieces of advice.

49. First of all, it should be asked to provide a short headline statement, summarising its assessment of the Agency's recent performance on consumer engagement. I envisage a sentence or two, commenting frankly on whether performance was up to expectations or not. This should not be a lengthy passage, attempting to balance positive and negative messages, nor should it be a bland 'could do better' type of statement.

50. The headline statement would be followed by a detailed commentary, picking up on specifics from within the Agency, from the internal challenge process, and from outside organisations. The detail set out here would naturally need to explain and justify the reasons behind the overall headline statement. It might include comments and recommendations related to particular experiences that had arisen over the year. The ACCE should also be required to comment on how well it thought the whole quality assurance system was working.

51. The ACCE would provide ad hoc advice to the executive or the Board at any time throughout the year if requested to do so, or if it felt that the Agency should take urgent notice some new development. The committee Chair should also have access at any time to the Agency's Chair and Chief Executive.

52. The committee's annual report should include a section on horizon-scanning for innovative forms of consumer engagement, picked up from UK experience or from overseas. I would expect the committee to recommend that new methods should be tried out, and I hope that the Agency will respond positively to such advice.

B.5. Structure and membership

53. I envisage that the ACCE should be a medium-sized committee of say 8-10 members. They will be appointed for their expertise in particular fields, though there could also be around 2 lay members, as with the scientific advisory committees.

54. In looking more closely at the membership, I should like to emphasise first that it should not include representatives of the Agency's major food stakeholders, however relevant their experience otherwise is. The committee's purpose is to assure the Board that the Agency has in place the systems needed to put the consumer first. To perform this role, I believe its members need to be, and be seen to be, independent of the Agency's day to day operations.

55. The ACCE is intended to deal with the process of consumer engagement, and I think that skills in these areas are precisely what need to be brought together on it:

§ Process: management efficiency, quality assurance, performance measurement and audit.

- § Consumer: awareness of social, economic, ethnic and linguistic diversity, and of disadvantaged groups; understanding of consumer perspectives and concerns; knowledge of consumer behaviour.
- § Engagement: successful communication and engagement, from the public, private or NGO sector.

There also needs to be capacity for:

- § Horizon-scanning: marketing to consumers, new consumer trends, UK and overseas experience.

56. The Chair will need to be a senior figure able to command the confidence of consumer interests, and have some understanding of the performance measurement and communication aspects of the committee's work. He/she will need to be an efficient chairperson.

57. Members are likely to come from the public and academic sectors, business and NGOs. The posts will of course need to be advertised under the normal public appointments rules, and individuals appointed according to the normal criteria of merit, equal opportunities and balance.

B.6. Practical arrangements and secretariat

58. The Board paper envisaged that the ACCE would meet formally twice a year, and I have taken this as a guideline until such time as the committee is set up and can decide its own working arrangements. I imagine that these would be worked up in outline between the committee Chair, the Agency and the secretariat, and approved by the full committee, probably in a special introductory meeting.

59. The main business of ACCE will be conducted in the formal meetings, and I believe that a typical agenda might consist of the following items:

- § Review the summary of self-monitoring returns and the internal challenge exercise for the previous period;
- § Hold any ad hoc discussions with Agency staff;
- § Review any ad hoc evidence submitted by outside stakeholders, and possibly meet some of them;
- § Decide how to carry out horizon-scanning work, and review information gathered;
- § Draw conclusions on Agency performance;
- § (Once a year) approve annual report;

§ Plan ongoing work.

This would clearly represent a full day's work.

60. The committee may also need to deal with other issues that are referred to it, eg between formal meetings, in which case the committee Chair may need to talk the Agency or get together a couple of other members for an informal meeting.

61. The committee will be publishing an annual report, but I think it will also need to decide whether some or all of its meetings should be held in public. Consumer stakeholders will naturally be taking an interest, and the Agency's general presumption is towards openness. Nevertheless the subject matter will largely revolve around FSA performance, and possibly the management implications flowing from it, and it may be difficult to have a frank discussion about these things if meetings are held in public. I think the minimum position would be for the committee to publish upcoming agendas, and to release at least a summary of the discussion shortly afterwards, but this is something that the committee will need to decide for itself.

62. I think that the Chair will need to spend around 12-15 days per year on committee business. This might consist of about three days for each committee meeting (in preparation, attendance and follow-up), and otherwise half to one day per month for the rest of the year. A little more time might be needed at the beginning, in deciding on practical arrangements and possibly in meeting key stakeholders to explain the purpose of the committee's work.

63. Committee members would need to devote around 8 days per year, half of this associated with formal meetings, and the rest on ad hoc work.

64. The ACCE will need a secretariat to deal with the normal range of administrative matters: arranging meetings and keeping minutes, following up committee decisions, dealing with correspondence, drafting the annual report, administering expenses, and generally providing the day-to-day contact with the Agency.

65. I recommend that Consumer Branch should provide this secretariat function, if possible through a dedicated member of staff who would be identified as the secretary of the committee. This should not present any conflict of interest: other FSA committees have their secretariat based in the policy division concerned, though the Spongiform Encephalopathy Advisory Committee, which advises several departments, has an independent secretariat located in Defra. For comparison the secretariat of the independent Farm Animal Welfare Council is provided by a small team in Defra, who for administrative purposes are part of Animal Welfare Division.

B.7. An alternative model: sub-committee of the Board

66. I think the Board had in mind an independent advisory committee, on similar lines to the scientific advisory committees. As well as exploring this, I have given some thought to an alternative model, that of a sub-committee of the Board, and asked interviewees how they thought this compared with a freestanding committee. In the light of these discussions, I think the main arguments for each model can be summarised as follows:

Arguments for a sub-committee	Arguments for a freestanding committee
Model works well for audit committees of PLCs.	Model works well for FSA's scientific advisory committees.
Could be best option if key role is audit.	Could be best option if key role is to provide advice.
Board should have high confidence in a committee with which it has umbilical link.	Stakeholders might have more confidence in an independent committee.
Model could be flexible, with outside members.	Doubts about value-added if ACCE dominated by Board members.
Sub-committee would have Board-level status.	Harder for ACCE to stand up to Board if not independent of it.
Sub-committee could give Board members a more rounded responsibility.	

67. In my view the clincher is the question of stakeholder confidence. Some of the stakeholders I spoke to were relaxed about the options, and most of the concern expressed to me about this came from Agency staff. My conclusion is that it is not worth taking the risk that consumers stakeholders might express dissatisfaction with the basis on which the committee is set up, and that it would be better to stick with the traditional freestanding model.

C. INTERNAL FSA ARRANGEMENTS

C.1. Internal support for FSA managers

68. Managers around the Agency need to be encouraged to follow best practice on consumer engagement and some may need more adjustment than others. This encouragement needs to come from a senior level, and I think the Director of Communications should take the lead in his contacts with other senior colleagues in London and in the SWANI offices. I hope he will be able to show the ways in which his Directorate is leading innovation by example on consumer engagement, and the benefits that are accruing from it to the Agency's business and reputation.

69. Managers will need support if they are to gain the confidence to innovate themselves in an area where they may feel that their existing consultation processes are perfectly adequate. Another Board member made a comment over communicating with the groups that the Agency does not hear well that I think is of more general validity: ***'It's not really about turning up the volume: it's a matter of learning new languages'***. I believe training and development is needed to help staff learn new ways of engaging with consumers.

70. Staff need to grasp that the new approach means letting consumers set the agenda to some extent and express their own concerns in their own way. It means spending more time listening to what consumers think is important. It means putting consumers first, in the literal sense of taking their perspective into account early enough to influence the terms of the subsequent debate.

71. Consumers could be asked to participate in this training. For example, Consumer Branch have already piloted a voluntary 'Feed your mind' scheme whereby staff spend one day a month with community food initiatives. There are thousands of these projects across the country¹¹, and I think many would welcome more involvement with the Agency. This might include development visits by small groups of staff.

72. I gather that the Agency already targets some of its training on management and performance issues, in order to help staff deliver better on their policy outcomes. Consumer engagement should be seen in a similar light, and corresponding training should be provided on engaging and communicating with consumers and influencing them. I recommend that Learning and Development Branch should discuss with Consumer Branch how best to set up specific training activities in this area.

¹¹ Westley Consulting advised the Agency on a Framework for its links with Community Food Initiatives. The report dated 28 August 2006 is available in the Agency Library.

C.2. Resources

73. The resource implications of these arrangements will need to be considered carefully by those immediately affected. My initial estimate is as follows:

Activity	Staff responsible	Estimated annual resource
One-off set up costs over ~ 6 months		
Initial set up for ACCE, including appointments and administrative arrangements	Head of Consumer Branch + admin support	10-20 days 10-20 days
Ongoing costs		
Champion consumer engagement	Director of Communications	Few days
Promote best practice in consumer engagement	Consumer Branch:	
Internal review and challenge to self-monitoring returns	Head of Branch	~ 17 days
Administer self-monitoring returns	New SEO posts	2 Full time
Attend ACCE meetings, and otherwise deal with ACCE Secretariat of ACCE	New Admin staff	1 Full time
Make self-monitoring returns	~25 Heads of Division & other managers around FSA	~12 staff days across Agency
ACCE expenses		£30-50,000
Training in consumer engagement	Head of Division to HEO level across Agency	25 trainee days across Agency

74. The Agency will need to consider to what extent these resources can be found within existing budgets. I suspect that the additional work in Consumer Branch will require additional resource, as this is currently a very small unit.

C.3. Programme evaluation

75. It is generally a good idea to build in an early evaluation of the effectiveness of new initiatives. The evaluation itself is facilitated if criteria are established at the outset, so that the relevant information can be gathered as work proceeds, rather than collected more haphazardly towards the end.

76. In this case, I suggest that the arrangements should be evaluated after two, or at most three, years. The issues that should be covered by the review would include:

- § How smoothly has the internal self-monitoring worked?
- § What difference did the internal challenge process make?
- § How valuable has the Board found the ACCE's assurance?
- § How useful has the Agency found the ACCE's challenge role?
- § How often has the Agency asked the ACCE for technical advice?
- § How useful has the Agency found the ACCE's horizon-scanning information and other guidance?
- § Do outside stakeholders think that the new arrangements have strengthened the Agency's consumer engagement?
- § Are Agency staff engaging more directly with consumers?
- § Do they feel more confident about consumer engagement?
- § Does the committee feel that the Agency is making good use of its outputs?
- § Overall, has the programme been good value for money?
- § Should the ACCE continue?
- § Is the membership of the ACCE appropriate?
- § Should detailed changes be made to the procedures?

C.4. Consumer engagement in the Management Information System

77. In the course of this work, some interviewees drew my attention to the recently-introduced Management Information System, and suggested that the returns needed for the ACCE should be submitted along with the MIS information. I have looked at this and think the idea is well worth exploring.

78. At present, the MIS consists of a quarterly report, compiled from returns from heads of division, which is submitted via the Executive Management Board to the Agency Board. Its main components are:

- § A report from the Chief Executive;
- § Performance against High Level Objectives and High Level Business Plan Targets. These consist of a Green/Amber/Red/Red Flag (RAG) status on each issue, plus a short commentary;
- § Information on finance, strategic risks and reputation.

79. The Board has already decided to set up the ACCE, and the main part of this report suggests ways in which the necessary information can be assembled for the committee to form an assessment of the Agency's performance. The information here

will be at quite a detailed level, and I don't think it would be useful to try and compress it for the purposes of the MIS. I am also a little concerned that if a detailed report goes direct from divisions to the EMB and the Board, this might undermine the ACCE's function in reviewing and forming an assessment of the Agency's performance.

80. The Chief Executive commented to me that he viewed the MIS like a dashboard, with different instruments relaying information and warnings against key threshold levels. As I see it, examples might include the 'doors not shut', 'low petrol' or 'high coolant temperature' lights. This kind of exception reporting might be appropriate for consumer engagement.

81. I am recommending that Consumer Branch should assemble the self-monitoring returns from operative units, and provide the first level of internal challenge where information is missing or performance is lower than expected. It might be possible to compile a MIS return at this stage using the Red/Amber/Green methodology and concentrating on the proportion of returns that met expected standards. I recommend that Consumer Branch should consider with Performance Management Branch the practicality of establishing such a return.

D. RELATIONSHIP TO SOCIAL SCIENCE RESEARCH COMMITTEE

82. Consumer Branch asked me to look at the link between the Advisory Committee on Consumer Research and the Social Science Research Committee (SSRC), and check with interviewees whether they saw any problem of overlap between these two initiatives. In the same way that the Board has called for assurance on the process of consumer engagement, it believes that the Agency's use of social science should be strengthened.

83. At the practical level, the two committees have quite distinct functions though both are concerned with quality and assurance. The ACCE is to keep the Agency's consumer engagement under review and check whether this activity is being carried out as effectively as it can be. The Social Science Research Committee is to advise the Agency on its use of social science, and check that research projects in this field are properly conceived and commissioned from the most appropriate specialists.

84. Their subject matter is also connected in that both are interested in consumer behaviour. The Agency's consumer engagement often focuses on what consumers think about its policies, and how they will react to them. Social science can help to understand many issues underlying consumer behaviour such as:

§ Consumers' values and motivation;

§ How best to bring about behaviour change;

§ Consumers' perceptions of risk;

§ Barriers to choice by consumers.

Social science can drill down and explore why people speak and behave as they do. The better the Agency understands this, the more effective its policies towards consumers are likely to be. As one interviewee put it to me, '**SSRC deals with the theory behind the action, ACCE with the action**'.

85. This connection is likely to grow as the balance of the Agency's work shifts from enforcement of rules (eg content of foodstuffs) towards behavioural change (eg persuading caterers to wash their hands, or consumers to eat more healthily). Other aspects of the shift include:

Less emphasis on:	More emphasis on:
Collecting evidence	Using evidence
Scientific evidence alone	Wider acceptance of what is relevant
Knowledge of people (what we know about them)	People's knowledge (what they know)
Seeking to deal with population as a	Exploring and addressing inequalities

whole	(which may affect only minorities)
Dealing with large institutional stakeholders	Dealing with individual consumers, and marginalised groups
Promoting health by ensuring food is safe (contamination/poisoning issues)	Promoting health by encouraging people to eat healthily (nutritional issues)

86. Most of the areas where the emphasis is increasing are amenable to social science approaches, and social science is an increasingly important strand of FSA evidence-gathering.

87. In many of the interviews I outlined the above thinking, and asked whether there was any problem of overlap. The general response was that there is indeed a natural connection between these two areas, but no-one suggested to me that this presented any practical problem.

ANNEX 1: INTERVIEWS

Carol Ainsbury	FSA Scotland
Terrence Collis	Director of Communications
Philip Cullum	Deputy Chief Executive, National Consumer Council
Sue Davies	Chief Policy Adviser, Which?
Maureen Edmondson	Board member, Chair of Northern Ireland Food Advisory Committee
Roberta Ferson	FSA Northern Ireland
Gill Fine	Director of Consumer Choice & Dietary Health
Sinead Furey	Member of old Consumer Committee, currently member of Northern Ireland Food Advisory Committee
John Harwood	Chief Executive
Rosemary Hignett	Head of Nutrition Division
Judith Hilton	Head of Microbiological Safety of Food Division
Dame Valerie Howarth	Board member
Dame Deirdre Hutton	Chair
Derrick Jones	Head of Analytical Surveys & Research Policy Division
Jeanette Longfield	Co-ordinator, Sustain, member of old Consumer Committee
Julie Monk	Head of Enforcement Division
Phil Morgan	FSA Wales
Prof Anne Murcott	Nottingham University, member of Advisory Committee on Research
Julie Norman & David Atkins	Chief Scientist Team
Chris Pomfret	Board member, Acting Chair of Welsh Food Advisory Committee
Nancy Robson	Chair of old Consumer Committee
Nick Tomlinson	Head of Chemical Safety of Food Division
Andrew Wadge	Chief Scientist and Director of Food Safety
Keith Watson	Head of Performance Management Unit

I also spoke more briefly to a number of other staff to clarify specific issues.

ANNEX 2: EXAMPLES OF CONSUMER ENGAGEMENT

Activity	Responsible unit	Direct/indirect
Action Research Studies with civil society organisations	Consumer Branch	direct
Attendance at exhibitions and events	Many divisions	direct
Citizen's Forums on Food (one trialled to date)	Consumer Branch	direct
Consumer attitudes survey and the quarterly Tracker	Consumer Branch	indirect
Discussion with consumer group representatives	Most policy teams	indirect
Consumer research (focus groups, workshops, interviews etc)	Many divisions	indirect
Dame Sheila McKechnie Award	Consumer Branch	direct
E-fora for promotion to children	Nutrition Division	direct
Feed Your Mind Volunteering Scheme (staff spend time with a food project in a socially deprived community)	Consumer Branch + volunteers around Agency	direct
Meetings with EU consumer organisations	Many divisions	indirect
Meetings with health professionals	Many divisions	indirect
Policy consultation exercises	Many divisions	indirect
Public enquiries via website etc	Most divisions	direct
School Council Network	Consumer Branch	direct
Stakeholder meetings	Many divisions	indirect

ANNEX 3: DRAFT BEST PRACTICE PRINCIPLES OF CONSUMER ENGAGEMENT

Aspect	Best practice principle
Quality of engagement	Regularly update the methods of consumer engagement to be used, eg by seeking outside advice.
	Consider whether some consumers need special approaches, and tailor the engagement methods accordingly.
	Encourage consumers to present and discuss their own view of the subject.
	Give consumers a chance to comment on and influence all the issues on which decisions are likely to be taken.
Extent of engagement	Take steps to capture the views of ordinary consumers, not just organisations.
	Before engaging, take steps to identify the people particularly affected by the issue in question.
	Meet consumers face-to-face.
	Take steps to prompt a response from consumers.
Due consideration	Log all consumer views and representations.
	Consider all consumer views and representations individually before taking decisions.
	Report the full breadth of consumer views to the Board, Ministers or other authority taking the decision.
Feedback	Draw up a detailed explanation of the reasons for the decisions reached.
	Communicate this explanation to interested consumers in terms they can understand.
Continuous improvement	Carry out a lessons learned exercise as part of each piece of work.
	Communicate lessons to others in the unit, and elsewhere in the Agency.

ANNEX 4: DRAFT SELF-MONITORING RETURN BY FSA MANAGERS

Aspect	Question	RAG	Comments
Scope	On what issues did you engage with consumers in the latest period?	N/A	
Quality	Did you get consumer views on all the issues where decisions were taken?		
	Did you encourage consumers to put views in their own way?		
Extent	Did you tailor your engagement methods to the needs of the consumers particularly affected?		
	Did you get a good response from consumers?		
Due consideration	Were all consumer views considered before decisions were taken?		
	To what extent did consumer views influence the decisions reached?		
Feedback	Did you give the consumer interests who commented an explanation of the reasons for the decisions reached?		
Lessons learned	Did you note down lessons for the future from this period of engagement?		
Overall	How successful was your engagement in this period?		

ANNEX 5: WESTLEY CONSULTING LIMITED

Westley Consulting was set up by Henry Brown and Alastair Beacon in 2002. In 2005 they were joined by Nikki Pearson. Henry has a chemistry degree and worked for many years in the Ministry of Agriculture, Fisheries and Food, dealing inter alia with food standards, financial planning, food marketing and CAP reform. Alastair is an agronomist who previously worked in the potato industry, as regional director of the largest producer-owned group in the country. Nikki worked in Government including Defra where she helped to set up cattle identification schemes and the Single Payment Scheme. She is a qualified Prince 2 and risk management practitioner.

Westley provides business strategy and marketing advice to public and private sector clients. We have a particular understanding of the impact of Government on SME businesses. Recent projects include:

- § Framework for the Food Standards Agency's links with community food initiatives. Developed the rationale, and showed how the Agency could use its new regional staff to build links with CFIs and other food & health work in the regions.
- § Assessment of the administrative burden of Defra's regulations. Jointly project-managed with RPS plc, concentrating on the assessment methodology, and managing a multi-consultancy team.
- § Supplier capacity study for North East Land Links. Reviewed the capacity of local producers and wholesalers to supply under the Public Sector Food Procurement Initiative.
- § Economic evaluation of Defra's Agriculture Development Scheme. Project-managed this job on behalf of Drew Associates Ltd, reviewing all assisted projects, interviewing stakeholders and making recommendations on the scheme's future.
- § Research for Sustain into the barriers to distribution of local food into London hospitals. We visited the procurement officers, interviewed suppliers and recommended how local food producers could access existing supply chains.
- § Marketing strategies and new branding approaches, business plans and grant applications for many farming and food businesses.
- § Report to Defra on the supply of large animal vets. Disproved Select Committee concern about an impending shortage of vets, and made recommendations on the better management of veterinary practices.
- § South East Strategy for Regional and Local Food. Reviewed needs of food businesses through interviews and focus groups, and made recommendations for better articulation of regional and county level support effort.
- § Our Healthy Future': delivery plan for sustainable farming & food in the South East & London. Managed small consultancy team, interviewed stakeholders, wrote delivery plan and laid foundations for a separate food strategy in London.