

The Provision of Allergen Information for Non Pre-packed Foods – Evaluation Research

Administrative Information

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1. Executive Summary

BACKGROUND AND OBJECTIVES

In 2008 the Food Standards Agency (FSA) produced voluntary best practice **Guidance on the Provision of Allergen Information for Non Pre-packed Foods**¹ aimed at caterers and retailers, which gave advice on controlling food allergens in food businesses where the food has not been pre-packed e.g. take-aways, restaurants, bakeries, deli counters, sandwich bars and schools etc. The guidance itself is a 50+ page A4 booklet and this was accompanied by a summary leaflet and poster.

This research was commissioned to assess the awareness and uptake of the full guidance, and gauge its impact on businesses. As mentioned above, the full guidance was accompanied by a leaflet and a poster, and research also examined the impact of these supporting materials amongst the target audience.

Specifically, the research objectives were to:

- Assess the level of awareness of the full guidance and supporting materials.
- Explore the uptake of the guidance and supporting materials and the extent to which it has led to businesses changing their practices.
- Assess the usefulness of the full guidance and supporting materials.
- Assess whether these materials would be sufficient guidance for businesses if a statutory requirement to provide allergen information was introduced.

RESEARCH METHODOLOGY

The project comprised both qualitative and quantitative research conducted between January and March 2010.

For the **qualitative stage**, a total of 16 in-depth interviews were conducted with:

- 10 caterers and retailers handling non pre-packed food and handling foods with allergens.
- 2 training bodies / colleges.
- 4 Enforcement Officers: 2 Environmental Health Officers (EHOs) and 2 Trading Standards Officers (TSOs).

¹ The Provision of Allergen Information for Non Pre-packed Foods (food.gov.uk/multimedia/pdfs/loosefoodsguidance.pdf)

For the **quantitative** stage, a total of 374 semi-structured telephone interviews were conducted with:

- 264 food businesses handling non pre-packed food and handling foods with allergens (mix of caterers and retailers).
- 110 Enforcement Officers (EHOs/TSOs).

MAIN FINDINGS

Systems & procedures in place regarding allergen management and notification of customers

Unlike the earlier pre-packed foods guidance research², it is clear that allergens management and notification is not as high a priority amongst the target audience for this guidance. Catering and retail businesses are more focused on general issues relating to food hygiene and safety. The information and training they receive tends to be dominated by these issues. Additionally, allergens action is not a legal requirement in these situations (unlike hygiene).

However, most businesses tend to be doing something with regard to the allergens controls they have in place, and in notifying customers but there is evidence to suggest many are doing the bare minimum. On the whole most businesses believe they are doing enough in terms of the systems they have in place, although these tend to be typical cross-contamination controls rather than allergen-specific measures. In terms of making customers aware, again businesses feel they are doing enough, although the majority are reactive in this sense – only specifying when asked directly by customers. Caterers generally seemed more up to speed than retailers; the latter being more reliant on those supplying products.

Guidance awareness and readership

A quarter of businesses handling loose foods containing allergens are aware of the 2008 guidance, in comparison to over a half of the food manufacturers aware of the relevant pre-packed foods guidance in 2006². No significant differences exist between caterers and retailers with regard to awareness levels, but medium and large sized businesses are more likely to be aware of the guidance than small or micro businesses. Those in Northern Ireland or Scotland have higher awareness than businesses in England or Wales.

² Guidance on Allergen Management and Consumer Information (food.gov.uk/multimedia/pdfs/maycontainguide.pdf) published in 2006, provides best practice advice to help food producers and retailers producing pre-packed foods

Most businesses aware of the full guidance claim to have been aware of it for some time (38% aware for longer than 18 months), whereas awareness of the leaflet is on a more recent time-scale (45% becoming aware in the past 6 months). The key channels for raising awareness of both the leaflet and guidance amongst businesses are local authorities (EHO/TSO) and the FSA Website.

Awareness of the guidance is much higher amongst Enforcement Officers, with 89% aware. Enforcement Officers are likely to have become aware via four key sources: the FSA website (23%), sent by FSA via email/post (21%), training sessions (21%) or via work colleagues (17%).

Once businesses and Enforcement Officers become aware of the guidance, this is almost always converted into access (i.e. access it via hard copy or online) and then readership.

Opinion of the guidance

The vast majority of businesses and Enforcement Officers think the guidance (full guidance, leaflet and poster) is useful, and opinions of the guidance are generally very positive. Caterers are more positive about the usefulness of the full guidance than retailers, while retailers are more positive about the usefulness of the leaflet than caterers. Enforcement Officers feel that the full guidance is more of a tool for themselves, and the leaflet more appropriate for the businesses with which they interact.

- **LEAFLET:** More than 9 in 10 businesses feel the leaflet is very or fairly useful. For most businesses, the leaflet is a relevant and useful reminder in an attractive, informative, easy to read and succinct format. For Enforcement Officers, the leaflet is a “good starting point”; simple succinct and straightforward. It scores less well for being easy to apply to business procedures or offering practical solutions (although this is more the role of the full guidance).
- **FULL GUIDANCE:** More than 9 in 10 businesses and Enforcement Officers feel the full guidance is very or fairly useful (although Enforcement Officers are somewhat less likely to find it useful for businesses – more so as a tool for themselves). Amongst businesses, the full guidance is rated most positively for being a good reference point which is comprehensive, well laid out and easy to navigate. Particular strengths for Enforcement Officers are that the full guidance is comprehensive, offers full authoritative guidance and is easy to read/well laid out.
- **POSTER:** More than 8 in 10 businesses and Enforcement Officers feel the poster is very or fairly useful (rising to 97% amongst businesses actively using the poster). Ratings are high and positive for the poster being easy to understand and well laid out, being a useful reminder for staff and a good starting point to managing allergens in non pre-packed food. Enforcement Officers describe the poster as easy to read and understand, clear, simple, concise and to the point. They also feel that the colourful visuals are useful for non-English speakers.

85% of businesses and 73% of Enforcement Officers feel the full guidance contains enough information if it became a legal requirement to provide allergen information.

Usage and impact of the guidance

There is some evidence that those aware of the guidance have more controls in place and that there is an element of proactivity in their notification of customers. 73% of those aware of the guidance say they have controls in place at all key stages of the food preparation process compared with 62% of those unaware of the guidance.

There is evidence that the guidance is being used by some businesses and driving some change. Largely, businesses can be segmented into three groups by the level of activity, although please note that this is based on qualitative analysis and is not statistically quantifiable:

- **NO IMPACT** (a minority – approximately one in eight businesses):
Businesses feel they already know everything within the guidance and are already doing what is necessary or that the issue doesn't really affect them.
- **SOME IMPACT** (the majority – approximately six in eight businesses):
Businesses have experienced heightened awareness about allergens which is leading to smaller scale behavioural change (e.g. changing ingredients, signage/labelling) and increased confidence when dealing with allergens and with the customers themselves.
- **LARGE IMPACT** (a minority – approximately one in eight businesses):
Businesses have started to make real changes to their work e.g. risk assessments, staff training, new allergens controls, new or enhanced labelling and/or notification of staff and/or customers.

Amongst Enforcement Officers, 84% are using the guidance as a strategic tool (to inform their own knowledge or approach), and the leaflet as an information handout to businesses. Generally the guidance has raised awareness and knowledge amongst Enforcement Officers in that they feel in a better position to advise businesses.

Dissemination of the guidance

Businesses that were unaware of the guidance believe that receiving the guidance from either their local authority or directly from the FSA are both appropriate channels. Caterers and retailers were asked to suggest how the FSA might make them aware of issues like these in the future, and feel that it boils down to the FSA simply getting a leaflet physically into the hands of businesses. Enforcement Officers seek allergens training from the FSA (for themselves) and suggest TV advertising / PR is the way to go for raising public interest (therefore hopefully putting pressure on businesses to respond). Some feel the guidance should be mailed out to businesses or promoted to them via local authorities, and some suggested the topic could be relevant for a future Food Safety Week.

Perceptions of the FSA

It's important to bear in mind that the FSA was identified up-front as the sponsor of the research (and therefore FSA awareness figures should be treated with caution). One in five businesses mention the FSA spontaneously as an organisation for food allergen information, training or advice. 95% recall the Agency following a prompt. Local authorities/EHO/TSO have the highest level of recall (97% overall; 30% unprompted).

Businesses were then asked to rate different organisations in terms of how influential they are upon a company's approach to allergens, and the FSA is seen marginally as the most influential (85% rating the FSA as very/fairly influential vs. 80% for local authorities/EHO/TSO). Enforcement Officers were asked similar questions, and the research found that the FSA is clearly the most prominent and widely used organisation among Enforcement Officers for issues related to food allergens in non pre-packed food. 84% spontaneously mention the FSA as an organisation that provides allergen information, advice or training in non pre-packed food. Following a prompt, 99% of Enforcement Officers say they have used the FSA for information on this issue, and 80% rate the Agency as the most useful organisation in this respect.

40% of food businesses and 70% of Enforcement Officers claim to have had some training/advice or feedback on allergens in non pre-packed food in the last few years.

RECOMMENDATIONS

No major changes need to be made to the full guidance, leaflet or poster. The key issue for the FSA is to boost awareness and usage of the guidance among both Enforcement Officers and businesses, by:

Stressing the importance of allergen controls and customer notification in non pre-packed foods

Many businesses become more engaged when they hear scare stories about customers suffering allergic reactions and/or businesses being taken to court in relation to these types of events. There is also evidence that some Enforcement Officers adopt this approach in order that businesses take them seriously.

Ensuring as many businesses as possible are aware of the guidance

Firstly the FSA must convince Enforcement Officers of the importance of this issue (relative to other issues for which they have responsibility). Secondly, the FSA should attempt to make businesses aware of the guidance directly, possibly via trade associations and trade publications.

In the longer term, increasing consumer awareness in the expectation of this leading to higher levels of business engagement

Evidence suggests that pressure from consumers is highly influential in achieving behavioural change in businesses. If more customers are aware of potential allergens, this may encourage dialogue with caterers and retailers.

Ideas from respondents in this research ranged from the expensive (TV advertising) through PR to some ideas more directly controllable by the FSA e.g. having allergens issues as part of Food Safety Week.

2. Background and Objectives

The UK Food Standards Agency aims to protect public health from risks that may arise in connection with the consumption of food, and otherwise to protect the interests of consumers in relation to food.

The Agency's strategic plan 2005-2010 has as its key aims:

- To continue to reduce food borne illness.
- To reduce further the risk to consumers from chemical contamination including radiological contamination of food.
- To make it easier for all consumers to choose a healthy diet, and thereby improve quality of life by reducing diet-related disease.
- To enable consumers to make informed choices.

The Agency's approach to **food sensitivity** i.e. food allergy and intolerance has three main aims:

- 1) Fund research that will help increase knowledge and understanding of food allergy and intolerance.
- 2) Strengthen food labelling rules to help people who need to avoid certain ingredients.
- 3) Help raise awareness of food allergy and intolerance among caterers.

In 2003, the Agency agreed an action plan to help consumers with food sensitivity. One component of this plan was to develop voluntary guidance for industry on aspects of allergen management and information outside statutory control.

In 2008, the Agency produced voluntary best practice **Guidance on the Provision of Allergen Information for Non Pre-packed Foods**³ aimed at caterers and retailers, which gave advice on controlling food allergens in food businesses where the food has not been pre-packed, e.g. take-aways, restaurants, bakeries, deli counters, sandwich bars and schools etc.

The full guidance, which was accompanied by a leaflet for smaller businesses⁴ and a poster⁵ that could be displayed in preparation areas, was disseminated by members of the drafting group that produced the guidance to their members (e.g. the British Retail Consortium, and the British Beer and Pub Association), as well as by announcing

³ The Provision of Allergen Information for Non Pre-packed Foods (food.gov.uk/multimedia/pdfs/loosefoodsguidance.pdf)

⁴ Food Allergy what you need to know (food.gov.uk/multimedia/pdfs/publications/loosefoodsleaflets1109.pdf)

⁵ Think Allergy (food.gov.uk/multimedia/pdfs/publications/thinkallergy.pdf)

it in a press release, placing media stories and via radio interviews. The Agency also sent a notification on the publication of the full guidance and supporting materials to all trading standards and environmental health departments through an email alert system. In addition, the Agency has undertaken a series of training workshops for enforcement officers where the guidance was discussed and those who received the training were given copies.

This research was commissioned to assess the awareness and uptake of the guidance, and gauge its impact on businesses. The guidance was accompanied by a leaflet and a poster, and research also examined the impact of these supporting materials amongst the target audience.

Specifically, the research objectives were to:

- Assess the level of awareness of the full guidance and supporting materials.
- Explore the uptake of the full guidance and supporting materials and the extent to which it has led to businesses changing their practices.
- Assess the usefulness of the full guidance and supporting materials.
- Assess whether these materials would be sufficient guidance for businesses if a statutory requirement to provide allergen information was introduced.

3. Methodology and Sample Profile

The research involved a combination of qualitative in-depth telephone interviews with Food Businesses (Caterers & Retailers), Training Colleges, and Enforcement Officers, and semi-structured quantitative telephone interviews with Food Businesses (Caterers & Retailers) and Enforcement Officers.

Fieldwork took place between January and March 2010.

3.1. Overview of approach

The project was split into three phases:

Stage One – Initial Qualitative

10 in-depth telephone interviews:

- 4 food businesses handling non pre-packed food and handling foods with allergens (3 caterers; 1 retailer).
- 2 Training Bodies / Colleges.
- 4 Enforcement Officers.

This stage examined relevant topics in-depth, enriching the quantitative responses but also informing the quantitative research design.

Stage Two – Quantitative

374 telephone (CATI) interviews:

- 264 food businesses handling non pre-packed food and handling foods with allergens.
- 110 Enforcement Officers.

This stage measured uptake and the extent to which particular views towards the guidance were held across the sample.

Stage Three – Follow-up Qualitative

- 6 in-depth interviews:
 - 3 Caterers
 - 3 Retailers

This stage allowed us to conduct follow up interviews with ‘interesting’ businesses from stage 2 to help illustrate how the guidance was being used in practice. ‘Interesting’ businesses were defined on the basis that they had taken specific steps as a result of the guidance enabling us to understand the value of the guidance among those who have really used it to make fundamental changes.

See Appendix 1 for further detail on the methodology employed.

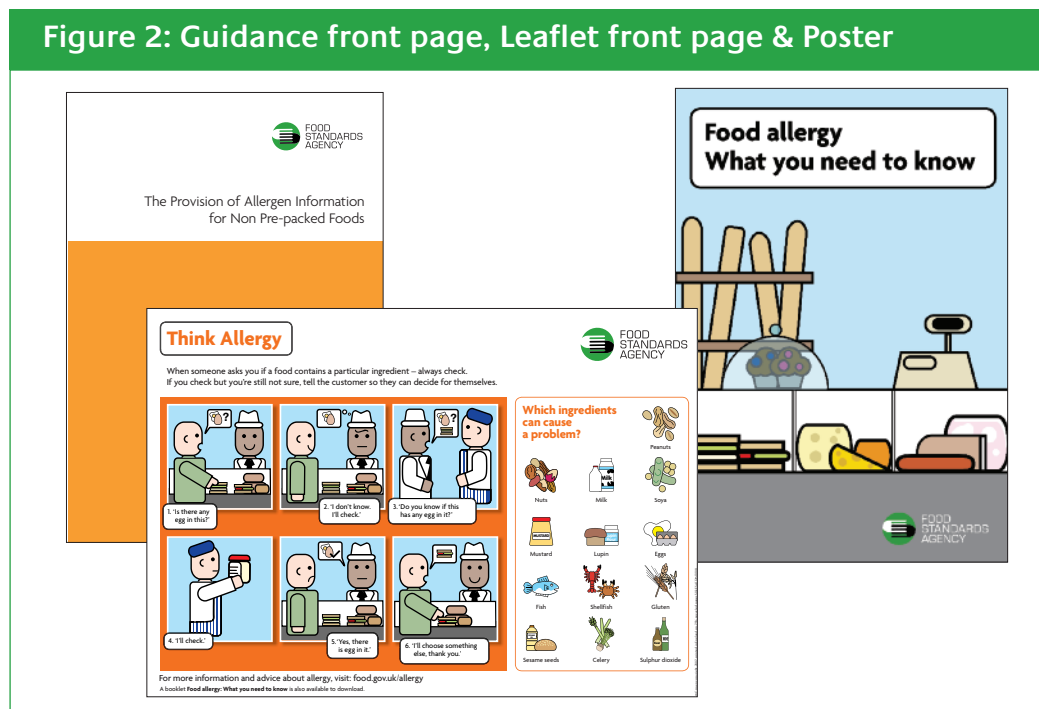
4. Main findings

The findings from this section are generally based on the results from the quantitative phase of the project, with some supporting evidence from the qualitative phase. These are then enhanced by references and quotations from the quantitative and in-depth interviews wherever appropriate. We have also included a couple of illustrative case studies gathered from the follow-up in-depth interviews.

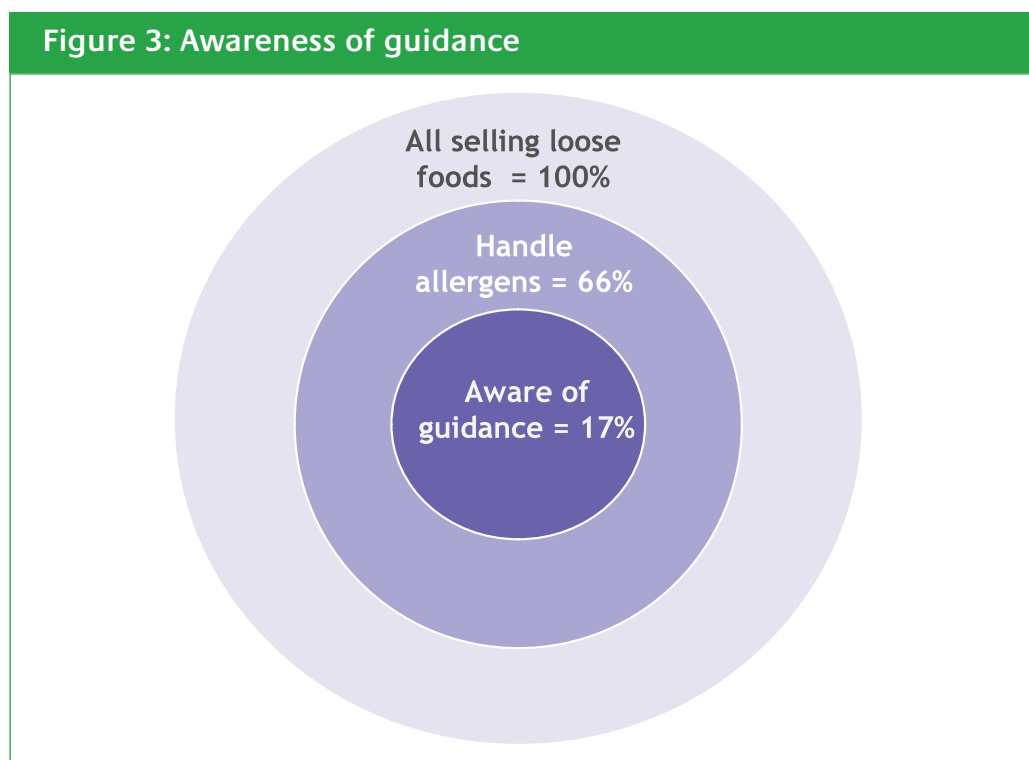
4.1. Guidance awareness and readership

All respondents (both those aware of the guidance and those unaware of the guidance) were asked to visit a simple webpage hosted by the fieldwork agency. This webpage displayed the following pictures of the full guidance, the poster and the leaflet to facilitate recall. If unable to access the webpage, descriptions were read out to the respondent.

Figure 2 shows these pictures of the guidance.



All caterers and retailers (selling food) were free-found and included in the initial sample. The sample was then screened to ensure a) that they were selling loose foods, b) that they handle foods with allergens and c) whether or not they were aware of the guidance. Figure 3 summarises that, overall, 17% of businesses selling loose foods are aware of the guidance.



However, this equates to 25% of businesses handling loose foods with allergens i.e. the target group for this study (Chart 1). In summary:

- 25% aware of the guidance (full, leaflet or poster).
- 17% are aware of the full guidance.
- 14% are aware of the leaflet.
- 12% are aware of the poster.

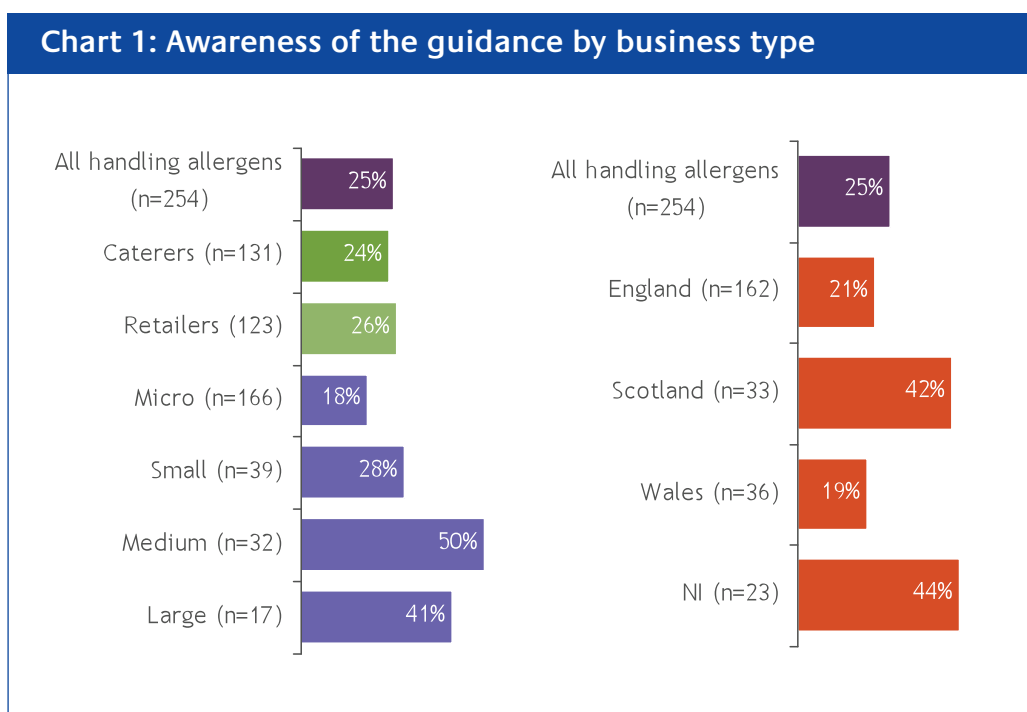
In comparison, just over a half of the food manufacturers (53%) were aware of either the full guidance or the leaflet about allergens in pre-packed food (when interviewed in 2008⁶).

⁶ Guidance on Allergen Management and Consumer Information – Evaluation Research (food.gov.uk/multimedia/pdfs/publication/allergenmanage0409.pdf)

Chart 1 also examines differences in awareness by business type:

No significant differences exist between Caterers and Retailers with regard to awareness levels, but size of business does appear to have an impact. Half of medium sized businesses are aware of the guidance, making them twice as likely to be aware compared with businesses overall. Large businesses are also more likely to be aware (41%) than Small (28%) or Micro businesses (18%).

Businesses based in Northern Ireland and Scotland are twice as likely to be aware of the guidance than those based in England or Wales.



Most businesses aware of the full guidance claim to have been aware of it for quite some time, with almost two-fifths (38%) claiming to have become aware of the guidance longer than 18 months ago and a further 14% becoming aware about 12-18 months ago. 24% claimed to have become aware of the full guidance 6-12 months ago, 13% 4-6 months ago, and only 7% in the last 3 months.

Awareness of the leaflet is on a somewhat more recent time-scale, with 45% of businesses claiming to have become aware only in the past 6 months (compared with 20% for the full guidance), 10% in the past 6-12 months, 19% in the past 12-18 months and 23% longer ago.

Not surprisingly, the key channels for raising awareness of both the leaflet and guidance among businesses are local authorities and the FSA.

32% of businesses became aware of the leaflet via their EHO/TSO, 16% from the FSA website and 15% through work colleagues. Other sources included: training sessions, training providers, FSA by post/email, trade associations and catering shows.

25% of businesses became aware of the full guidance via their EHO/TSO, 23% from the FSA website and 14% through work colleagues. Other sources included: training sessions, training providers, FSA by post and trade associations.

Once aware, the vast majority of businesses read the full guidance. 89% of businesses aware of the leaflet claim to have read it, and 93% of those claiming awareness of the full guidance say they have read the full guidance.

About half of those businesses aware of the leaflet have a hard copy either handed or posted to them; the other half have viewed or printed it from the FSA website. Just under half (48%) claim to have read the entire leaflet, a fifth have read some of it (21%) and a similar proportion have skim read it (19%). 11% are aware of it but have not accessed the leaflet.

About 40% of those businesses aware of the full guidance have a hard copy either handed or posted to them; the other 60% have viewed or printed it from the FSA website. Over a third (37%) claim to have read the entire full guidance, a quarter (24%) have read some of it while a third (32%) have skim read it. Only 7% of those aware have not accessed or read the full guidance.

Awareness of the guidance amongst Enforcement Officers is much higher with 89% claiming to be aware of the guidance. 78% claim awareness of the leaflet, 76% of the full guidance and 61% of the poster.

Unlike businesses, awareness amongst Enforcement Officers is higher than it was for 2006's pre-packed allergens guidance, with 89% aware of any guidance compared with 78% of Enforcement Officers aware of the 2006 guidance (when interviewed in 2008). Enforcement Officers are likely to have become aware via four key sources: the FSA website (23%), guidance being sent by FSA (21%), via training sessions (21%) or from work colleagues (17%).

94% of Enforcement Officers who are aware of it have read the full guidance. A quarter (24%) claim to have read all of it and a third have read some (34%), while a similar proportion have skim read it (35%). Only 2% have not read it at all, and 4% have not accessed it.

4.2. Opinion of the guidance

The vast majority of businesses and Enforcement Officers think the guidance (full, leaflet and poster) is useful, and opinions of the guidance are generally very positive from both the in-depth interviews and the main survey.

Caterers are more positive about the usefulness of the full guidance than retailers, and retailers are more positive about the usefulness of the leaflet than caterers. Enforcement Officers feel that the full guidance is more of a tool for themselves, and the leaflet more appropriate for the businesses with which they interact.

For most businesses, the **leaflet** is a relevant and useful reminder in an attractive, informative and succinct format. For Enforcement Officers, the leaflet is a “good starting point”; simple succinct and straightforward.

For some businesses the **guidance** is a real eye-opener, and for many it will serve as a very useful reference and training tool; comprehensive, organised and clear. Enforcement Officers see it as more appropriate for themselves than businesses (who may not have the time, focus or inclination to read it). In terms of like/dislikes of the full guidance, although some pick out specifics, the power of the guidance lies in its comprehensive content yet straightforward and easily navigable layout – allowing easy access to what is relevant.

4.2.1. Opinion of the Full Guidance

Figure 4: Full Guidance

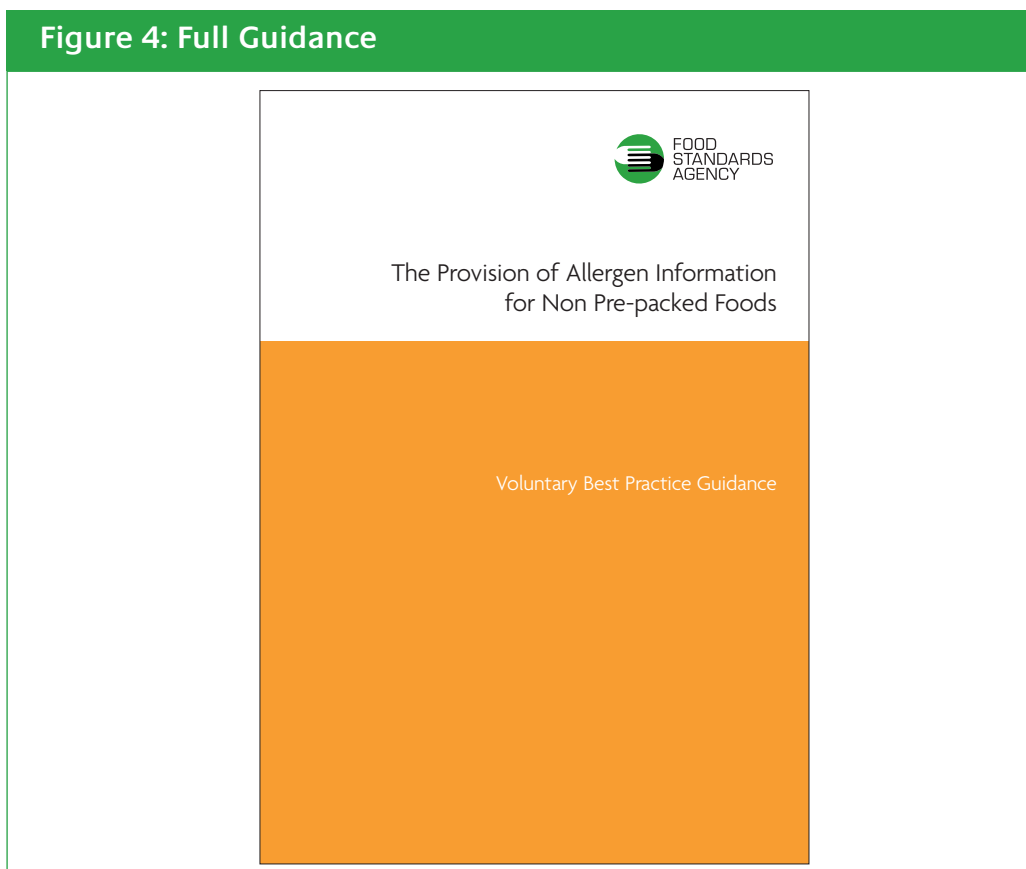
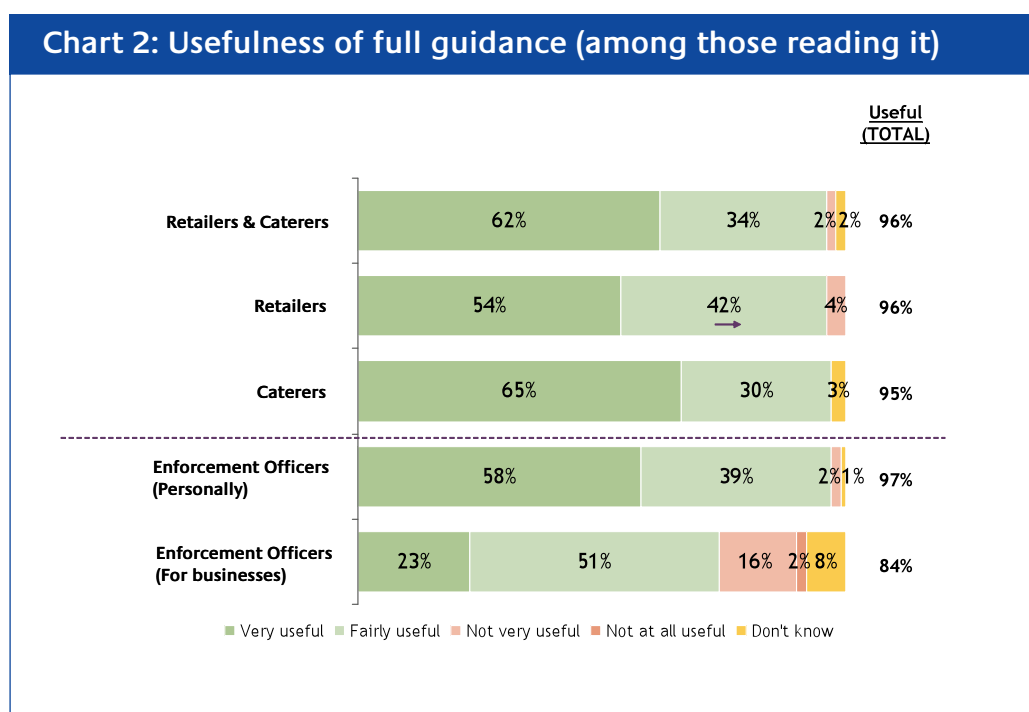


Chart 2 demonstrates that the vast majority of businesses and Enforcement Officers think the full guidance is useful. Enforcement Officers are more likely to say it is useful to them personally (58% rating “very useful”); as opposed to a tool for the businesses they support (23% rating “very useful”).

Caterers are slightly more positive about the usefulness of the full guidance (65% rating it “very useful” vs. 54% of retailers).

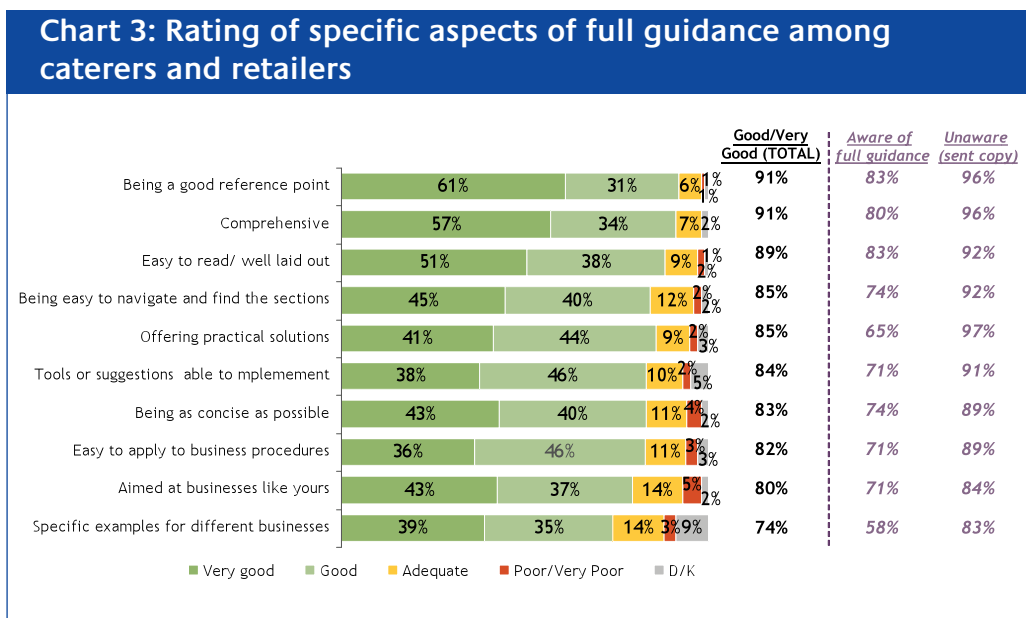
92% of those aware of the full guidance rated it as useful, while 97% of those unaware (but sent a copy in the post) rated it as useful.



Base = All reading full guidance: Caterers (118) and Retailers (57) and combined (175), Base: All Enforcement Officers (88) Qs – Caterers & Retailers: Q31; Enforcement Officers: Q27, Q29

Caterers and retailers were asked to rate specific aspects of the full guidance, and Chart 3 shows that the full guidance was also rated highly on most aspects by businesses. Again, those initially unaware of the guidance (and sent a copy in the post) were more positive about it. However, it is important to consider that they will have therefore scrutinised it more. The full guidance is rated most positively for being a good reference point which is comprehensive and well laid out (over half of businesses rate it as “very good” on these dimensions).

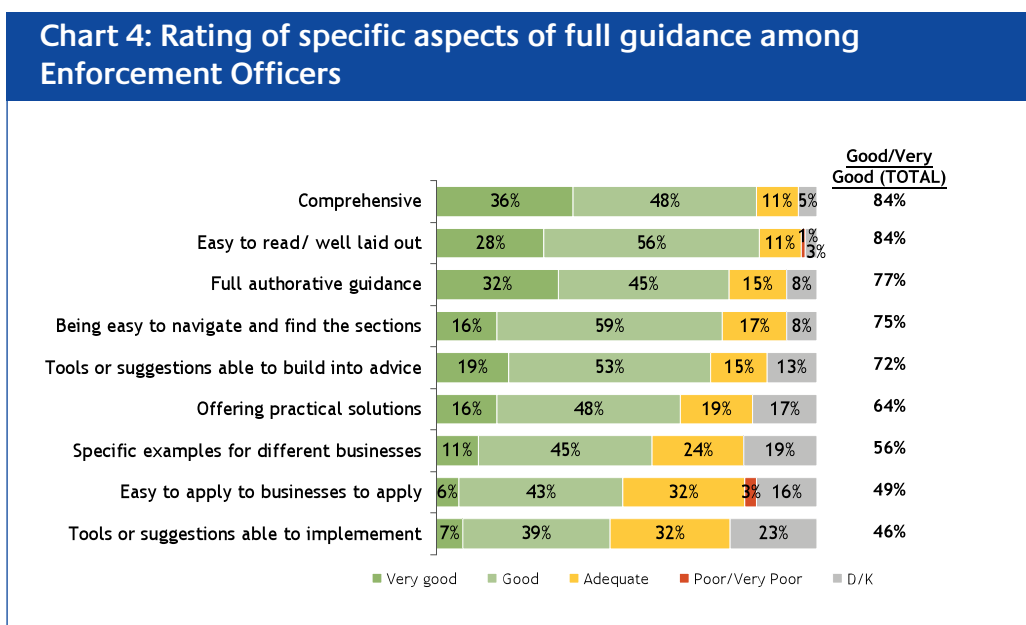
Caterers are more likely to feel that the full guidance is “aimed at businesses like yours”, with 86% rating the full guidance as very good/good on this dimension compared with 67% of retailers.



Base = All reading full guidance: Caterers & Retailers (175), aware (66), unaware (109);
 Qs – Caterers & Retailers: Q35

Enforcement Officers were asked to rate the full guidance on the same specific measures, and Chart 4 shows that amongst this audience also, the full guidance is rated highly on most aspects. Particular strengths of the full guidance for Enforcement Officers are that it is comprehensive (36% rating “very good”), offers full authoritative guidance (32%) and is easy to read/well laid out (28%).

The full guidance is somewhat weaker (less than half rating “very good/good”) in terms of the practical issues of providing tools or suggestions businesses are able to implement or in being easy to apply to business procedures. However, ratings here are not overtly negative – more a sense of adequacy or uncertainty (relatively high proportions of “don’t know”) – perhaps as a result of it being early days for implementation.



Base = All Enforcement Officers reading full guidance (88); Qs – Enforcement Officers: Q35a

Many businesses and Enforcement Officers admitted that the guidance had brought issues to their attention that they hadn't previously been aware of, and opinions of the guidance were generally very positive from both the in-depth interviews and the main survey. Respondents were asked to detail their likes and dislikes of the full guidance and in addition to the positive aspects covered in Charts 3 and 4, businesses and Enforcement Officers liked that the full guidance offered useful step by step risk assessment, was easy to turn into a staff training manual and that it told them things they did not know – an element of surprise that was perhaps not expected by many!

Negative comments were few but revolved around the fact that for some, the full guidance was too big / too comprehensive and perhaps more appropriate for large businesses. However, one respondent summed up the initial worries of those approaching the full guidance as follows:

“My first thought was it was huge, but I have not found anything in it that is off putting” Caterer

This is of course an indication that in fact the document is much more user-friendly than it might at first appear, and that so long as the FSA can get businesses and Enforcement Officers to open up the full guidance in the first place, they are quite likely to be pleasantly surprised.

Ideas for improving the full guidance include adding more practical examples from different industries and/or business sizes, creating a smaller version, and simply getting the guidance into the hands of businesses in the first place.

Caterers and retailers, on the whole, couldn't think of any particular improvements to make, although some feel that more practical examples covering different industries and sizes of business would be useful. Others felt it could be reduced in size, simplified, or issued in a smaller version for junior staff / smaller businesses.

Some previously unaware of the guidance were disappointed about this fact and wanted the guidance made available to more businesses, along with being kept up to date by FSA generally. When asked how they might best be made aware of such information, businesses are mixed as to whether this should be via post or email or via FSA or Local Authorities, but in agreement that they should be made aware full stop.

“Send the information in the first place” Caterer

Many Enforcement Officers also think the full guidance is fine as it is; a useful document. However, some felt it could be made more user-friendly, especially for smaller businesses who they feel would not have or make the time to read and digest the entire guidance e.g. via an accompanying DVD, taking some bits out. However, there is no consensus over which bits might be cut as Enforcement Officers accept that the full guidance needs to be comprehensive in order to be complete. A couple of suggestions were to reduce some of the full explanations to bullet points or to allow tailoring of sections depending on business type or size. Others suggested that FSA might simply make it smaller / more concise (especially for SMEs). As with businesses, some Enforcement Officers felt the full guidance might benefit from having more specifics about different business types, or more practical examples.

85% of businesses and 73% of Enforcement Officers feel the full guidance contains enough information if it became a legal requirement to provide allergen information. Those who do not agree about this feel that they would need to see the legislation in detail beforehand.

Opinion of the Leaflet

Figure 4: Full Guidance

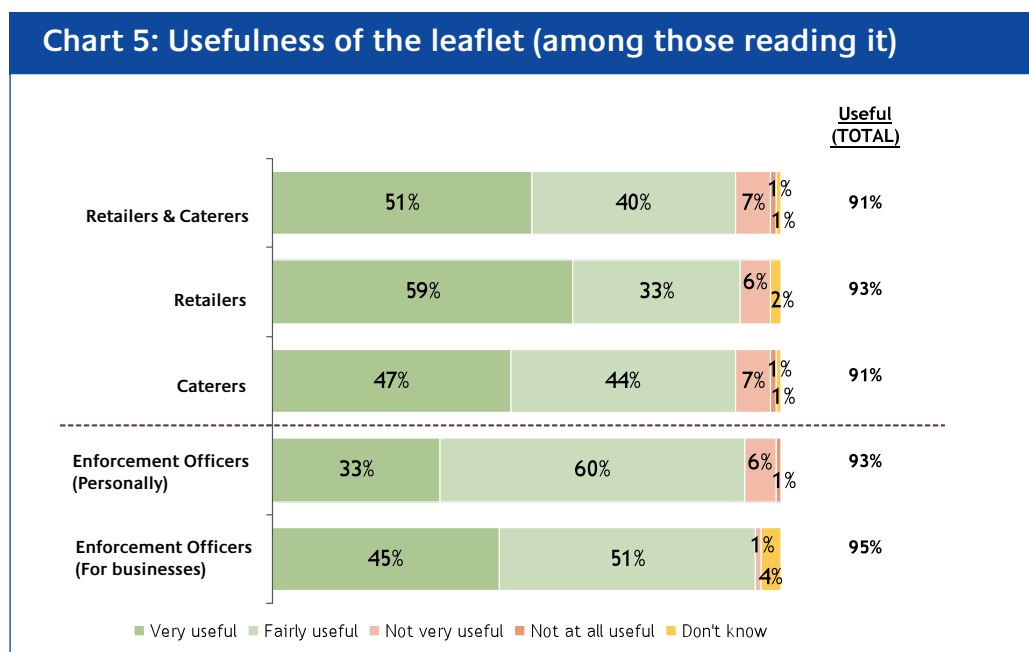


The vast majority of businesses and Enforcement Officers, who have read the leaflet, think the leaflet is useful (Chart 5).

Overall, more than 9 in 10 businesses feel the leaflet is very or fairly useful. 95% of those aware of the leaflet rated it as useful, while 90% of those unaware (but sent a copy of the leaflet in the post to review) rated it as useful.

Retailers are most positive of all, with 59% of them rating the leaflet as “very useful”, compared with 47% of caterers.

Enforcement Officers were asked to rate the leaflet both from their own perspective and from that of the businesses they worked with and for whom it was aimed. Although overall, the leaflet is perceived as useful on both levels by over 9 in 10 Enforcement Officers, it is felt to be somewhat more useful for businesses than for Enforcement Officers themselves, with 45% rating it “very useful” for businesses (vs. 33% on a personal level).

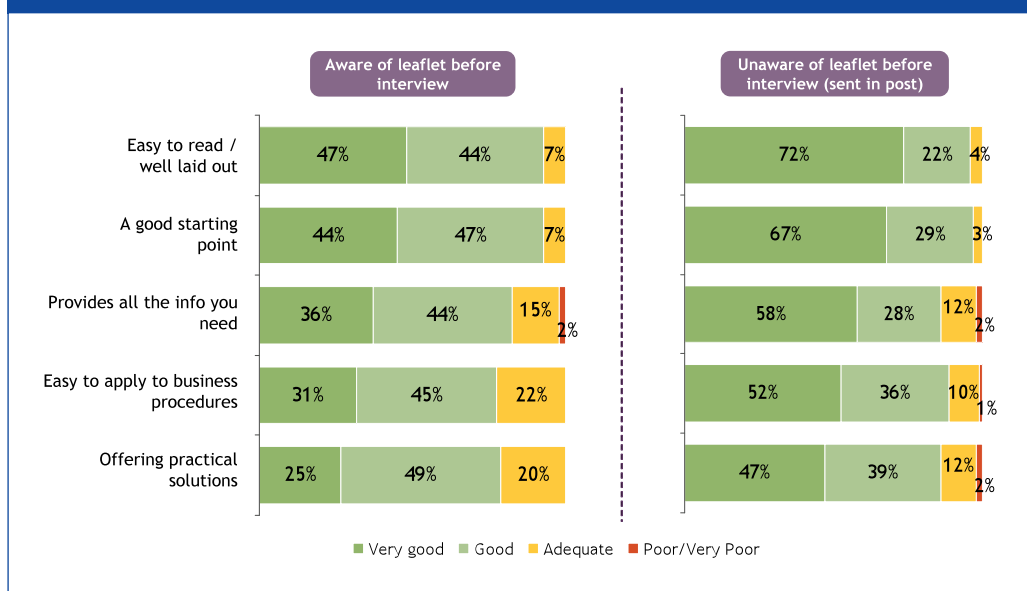


Base = All reading leaflet: Caterers (110) and Retailers (54) and combined (164), Base: All Enforcement Officers reading leaflet (85); Qs – Caterers & Retailers: Q20; Enforcement Officers: Q18, Q20

Caterers and retailers were then asked to rate specific aspects of the leaflet. Chart 6 shows that the leaflet is rated highly on most aspects by businesses, although those initially unaware of the leaflet (and sent a copy in the post) were more positive about the leaflet, in that they give it a higher proportion of “very good” compared with “good” ratings. However it is important to bear in mind that they will have scrutinised it more.

The leaflet is rated strongest for being easy to read, well laid out and that it represents a “good starting point” for the issue of allergens in non pre-packed food. Although very few ratings of “poor/very poor” were given, around a fifth of businesses aware of the leaflet before the interview feel the leaflet was only “adequate” in a practical sense of being easy to apply to business procedures or offering practical solutions.

Chart 6: Rating of specific aspects of the leaflet amongst caterers and retailers



Base = All Caterers & Retailers reading leaflet (164); Qs – Caterers & Retailers: Q22

Opinions of the leaflet are positive both from the in-depth interviews and the main survey. Respondents were asked to detail their likes and dislikes of the leaflet and in addition to the positive aspects covered in Chart 6, businesses and Enforcement Officers feel the leaflet is particularly good as a useful document for showing to junior staff, and easy to use in this respect due to the colourful pictures.

“It was informative, easy to understand, user-friendly. You didn’t have to think about what it was about. I would say it is good for all abilities.” Retailer

Very few do not like the leaflet or do not find it useful and these views were driven either from a sense of already knowing everything in the leaflet or that the leaflet is too simplistic (for Enforcement Officers on a personal level in particular).

4.2.2. Opinion of the Poster

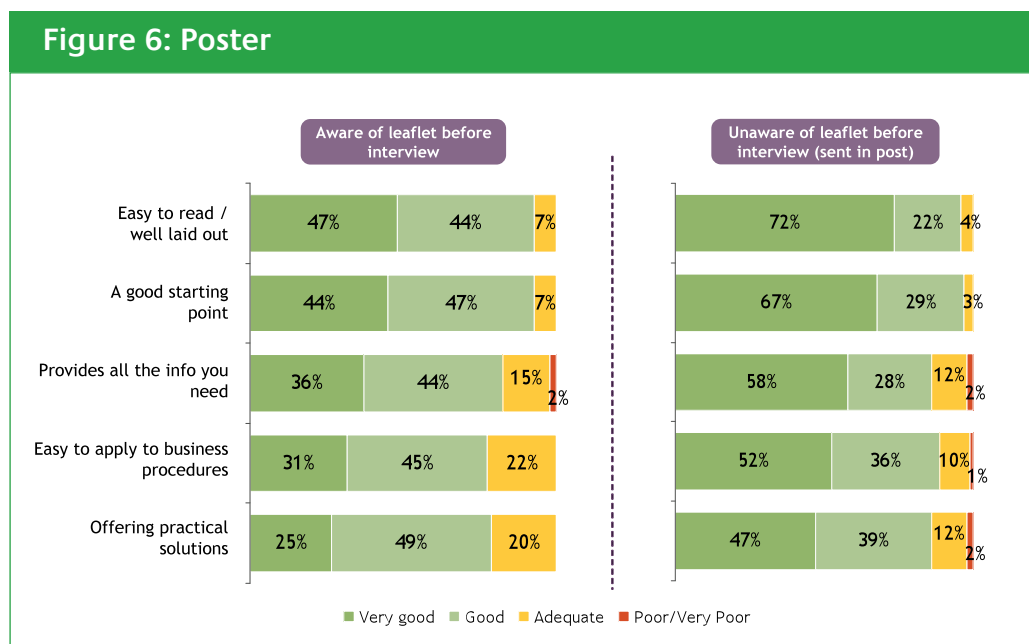
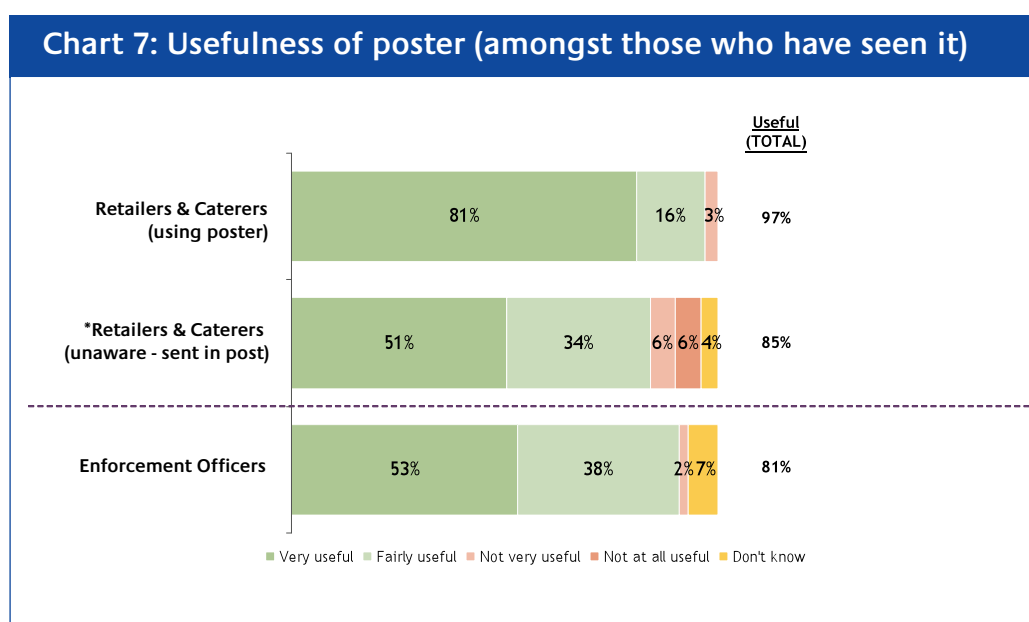


Chart 7 shows that the vast majority of businesses and Enforcement Officers think the poster is useful, especially those businesses who are actively using it. 81% of retailers and caterers using the poster say that it is “very useful”, compared with just over half of Enforcement Officers (53%), and businesses previously unaware of the poster (51%).



Base = All Caterers and Retailers who have used Poster (31), All Caterers and Retailers unaware but sent Poster (109), Base: All Enforcement Officers who have used Poster (55); Qs – Caterers & Retailers: Q39a; Enforcement Officers: Q40a, Q41

Businesses were asked to rate specific aspects of the poster and these scores are positive for the poster being easy to understand and well laid out (96% rating “very good or good”), being a useful reminder for staff (94%), and a good starting point to managing allergens in non pre-packed food (91%). 79% of businesses (who have non-English reading employees) rated the poster as “very good or good” as being useful for non-English readers.

45% of **Enforcement Officers** (who have seen the poster) feel it is more useful for businesses who employ staff who do not have English as their first language (15% think it’s less useful for these types of businesses, and 31% feel there is no difference).

The poster is described by several, and captured precisely by one in particular as

“very simple, nice and clear – it communicates a serious message in an interesting way” Caterer

There is a high opinion of the poster amongst businesses. Most caterers/retailers feel that the poster is good for raising awareness and highlighting the issue. They like its basic and colourful visuals, and find it instantly informative, clear, concise and easily read and understood. It is seen as a good training tool and a general simple ready-reference in day to day situations. A minority had a negative view of the poster, feeling it was a bit childish and therefore somewhat patronising.

There is evidence that businesses are using the poster – mainly to inform staff (put up in the kitchen or staff areas). Some are also using it to share with customers (e.g. placing it next to a main menu, on reception or in a shop window).

Enforcement Officers generally think the poster to be useful for caterers and retailers. They describe the poster as easy to read and understand, clear and simple, concise and to the point. They like that it is colourful and visual – adding that this is useful for non-English speakers.

4.3. Usage and impact of the guidance

4.3.1. Businesses

There is evidence that the leaflet and full guidance is being used by some businesses and driving some change, although caterers are more likely to be doing this than retailers. In qualitative terms (across businesses overall – both caterers and retailers), the guidance had approximately: no impact for 1 in 8, some impact for 3 in 4 and a large impact for 1 in 8.

No impact

These businesses feel they already know everything contained in the guidance and that they are already doing what is necessary e.g. following HACCP or just see allergens as part of common sense best practice.

A few are beholden by the rules set down by Head Offices of larger organisations, and must follow these procedures regardless of new information. Therefore it will be important for the FSA to ensure the guidance is embedded at that Head Office level in order for it to be appropriately cascaded to front line staff.

Some feel that the issue does not really affect them.

“Nothing. All necessary procedures were already in place. We didn’t need to change anything” Caterer

“None really, but we are always ready to help and advise customers. Our systems are pretty good” Retailer

“I didn’t make any changes; we work to a high standard already here. I felt there wasn’t any need to change things.” Retailer

Some impact

These businesses feel that the guidance has made them more aware of the different allergens (particularly of the potentially serious nature of allergens) and find as a result that they are now better able to answer customer questions and engage in two-way dialogue with customers.

Some feel that this heightened awareness will influence future behaviour when dealing with allergens. In particular, some had been surprised at the nature of allergens previously unknown to them e.g. celery – and would be taking specific small actions around these. It is not clear whether or not these actions would be those specifically detailed in the guidance, or simply following current best practice as used for other allergens and cross-contamination risks. Actions included wrapping the allergen product separately, storing it in a different section or simply working with that food item in a state of higher awareness.

Some are removing or changing some ingredients; others are putting up signage and labelling for staff and/or customers or tweaking the detail of these. Quite a few are now using “may contain” labelling to warn customers about allergen risks and provide a “due-diligence” defence if necessary.

“I was already quite well set up so I didn’t really alter anything but it did make me more aware of allergies” Retailer

“It has made us more aware about allergens that we didn't know before. We will be more aware of customers that might have allergens and be more prepared if they ask questions” Caterer

“We have now moved our celery to a completely different area.” Retailer

“I will make changes to training, just to ensure all staff are aware of allergens especially the less well known ones” Caterer

“We just made the leaflets and posters more accessible in the stores so customers can see them and take away a leaflet if needed.” Retailer

“It just made us more aware of making sure that there are instructions in the menus to tell customers that have any allergies to make a member of staff aware. We were doing that before but now it's highlighted more and we are more careful to ensure it's happening so that has increased since reading the guidance” Caterer

Large impact

These businesses have started to make real changes to their work as a result of the guidance.

Some are implementing risk assessments, altering staff training (either formal or informal/on the job), some have introduced new controls for allergens cross-contamination (e.g. separate chopping boards, ice-cream scoops); some have made changes to labelling on menus and websites. Quite a few are now using “may contain” labelling to warn customers about allergen risks and provide a “due-diligence” defence if necessary.

“It just made us more aware, we knew these things about allergies but didn't take too seriously, we didn't realise how serious it could be until we read the leaflet then implemented new knives and chopping boards and more staff training” Caterer

“Our original notice only contained information about nuts as potential allergens, so we have revamped it, to include all relevant foods, and we have used the FSA 'Think Allergy Title'.” Caterer

“Immediate training of all kitchen and service staff and some of the information is printed from the website and pinned on notice boards around food and drink serving areas.” Caterer

“We didn't notify them at all before receiving the leaflet, but we now have a list of possible allergens on the counter next to our menu.” Caterer

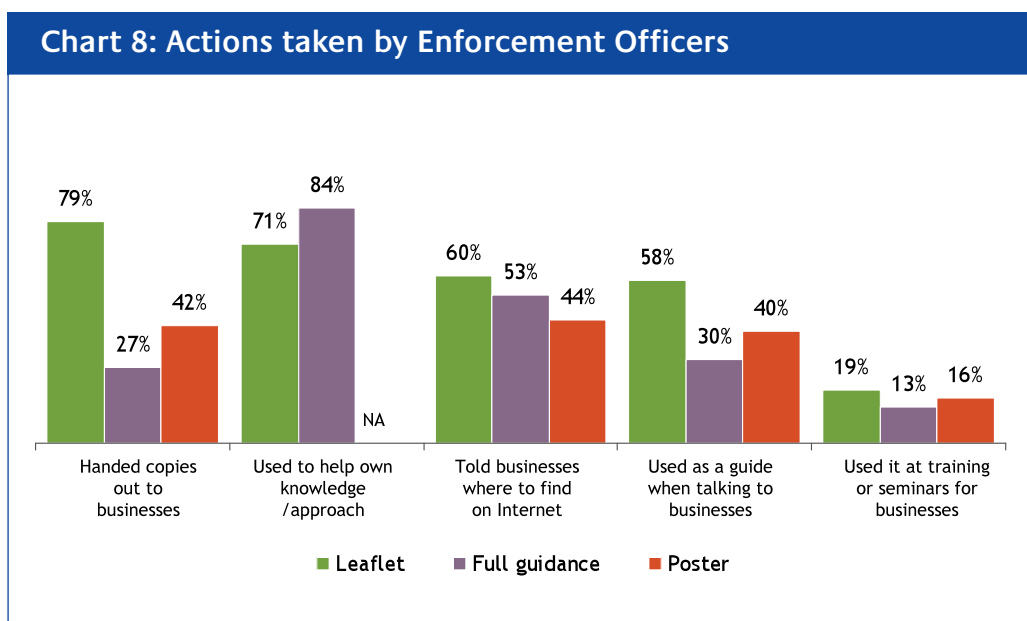
Here we include **two case studies**, drawn from the qualitative work, in order to illustrate typical scenarios where the guidance has been used:

Case study 1 – Catering Company	
Background	Large catering company providing catering for a huge variety of client organisations
Trigger for interest	Had an incident where a customer suffered serious anaphylactic reaction
Awareness and usage of guidance	Decided to read information on allergens on FSA website and found full guidance and leaflet
Impact of guidance	Guidance has been used to change ingredients, notices and staff training (with all staff sent a copy of the leaflet and staff have been trained on the issue)
Opinion of guidance	Felt the guidance and leaflet were both very useful and helped them make the necessary changes

Case study 2 – Large bakery	
Background	Large bakery providing bread and other products to a department store restaurants and other large retailers
Trigger for interest	Are now audited annually by two clients to ensure proper allergen management and documentation
Awareness and usage of guidance	Uses the full guidance as the main source to inform their allergen management documentation
Impact of guidance	Also have the leaflet and poster in both shops as a simple reference for staff when dealing with customer queries
Opinion of guidance	Feels the FSA guidance is the full authoritative documentation on allergen management and does not need to consult other sources when pulling together their procedures / documentation

4.3.2. Enforcement Officers

Almost all Enforcement Officers (with access to the materials) are using the leaflet, full guidance and poster. Over four fifths (84%) have used the full guidance to formulate their own approach to the issue. Chart 8 summarises the actions taken by Enforcement Officers:



Base = All Enforcement Officers who have access to leaflet (85), full guidance (90), poster (55); Qs – Enforcement Officers: Q16, Q25, Q38

The full guidance is being used as a strategic tool – to enhance Enforcement Officers’ own knowledge and approaches to the issue of allergens in non pre-packed food (84% are using it for this purpose). Enforcement Officers are less likely to hand out the full guidance to businesses (although happy to tell businesses where to find it for themselves on the Internet).

The leaflet is the guidance most likely to be handed out to businesses (79% of Enforcement Officers have handed out the leaflet compared with only 27% handing out the full guidance) and used as a guide when talking to businesses.

The poster is also used in this more tactical manner with businesses – but less so than the leaflet and 22% have done nothing with the poster. 6% have done nothing with the leaflet and 2% have done nothing with the full guidance.

Generally, the guidance has raised awareness and knowledge amongst Enforcement Officers in that they feel in a better position to advise businesses. There is evidence to suggest that the guidance is having an impact in the following three ways:

- The updating of existing / in-house materials.

- Enforcement Officers spending longer on this issue relative to other issues.
- Guidance being taken along to business visits.

Many talked about the fact that they would be raising awareness and giving out more information and advice on the topic and that it would be more comprehensive advice as a result of having read the guidance. Some had already developed or updated their own materials (e.g. leaflets, pro-formas, aide-memoires) and some had started to include information from the guidance in their inspections. For others, the guidance had simply confirmed that they were on the right track.

*“We give more advice on the subject of allergens to those we deal with and try to encourage them to look at their current practices and make adjustments in line with the guidance from the FSA.”
Enforcement Officers*

“We made changes to our pro forma, where we added some questions related specifically to allergens.” Enforcement Officers

Other Enforcement Officers had not yet done so but were planning to make changes. Some would be embarking on an awareness campaign, others simply planned to take the guidance with them on visits and generally to feel that they would be giving out more / better advice in the future as a result of the guidance.

“We are definitely planning an awareness campaign. We will roll the campaign out, premises by premises, making sure that every site has a personal visit highlighting food allergens in non pre packed food.” Enforcement Officers

Training colleges are using the full guidance to a small extent, mainly because allergens play only a small part of the overall training programme (and it is not mandatory). Trainers will tend to refer to it from time to time but do not use it regularly.

4.4. Dissemination of the guidance

Businesses that were unaware of the guidance believe that receiving the guidance from either their local authority or directly from the FSA are both appropriate channels.

Businesses that were unaware of the guidance were asked which channels would be appropriate for being made aware of guidance documents. 80% felt that it would be appropriate via their Local Authority/EHO/TSO, and 39% via trade associations. Retailers were more interested in this latter option than caterers (50% vs. 34%). 83% feel it is appropriate to be made aware direct from the FSA via post, and 50% via email.

Businesses were asked to suggest how the FSA might make them aware of issues like those related to allergens in the future. Caterers and retailers feel that it boils down to

FSA simply getting some aspect of the guidance (e.g. the leaflet) physically into the hands of all relevant businesses; via the post either directly or via local authorities or trade associations and magazines.

“The booklet seems to be all that is required. They should just make sure everyone has a copy” Caterer

Several feel that they would like to receive relevant correspondence updates on issues from the FSA, although the jury is out on whether this ought to be post vs. email contact (it depends very much on individual preference).

“Regular updates. Written correspondence i.e. letters would be the best way for me” Caterer

“Through regular updates perhaps by email with links to the (FSA) website” Caterer

A smaller number would find it better if issues were raised via visits from Environmental Health Officers, while others are keen for the FSA website to be utilised for bringing business attention to such things.

Enforcement Officers seek allergens training from the FSA, and suggest TV advertising is the way to go for raising public (and hence business) interest.

Regarding suggestions for how the FSA might improve awareness and dissemination of the guidance amongst Enforcement Officers themselves, the most popular request was for free or low cost staff training courses, and/or seminars on allergens.

Several Enforcement Officers would like to have email and/or website updates, although some mentions are made of the FSA website requiring some improvements in terms of being user-friendly. Others feel that advertising in trade magazines would be useful, and some mention that updates could be given at the regular regional meetings they attend.

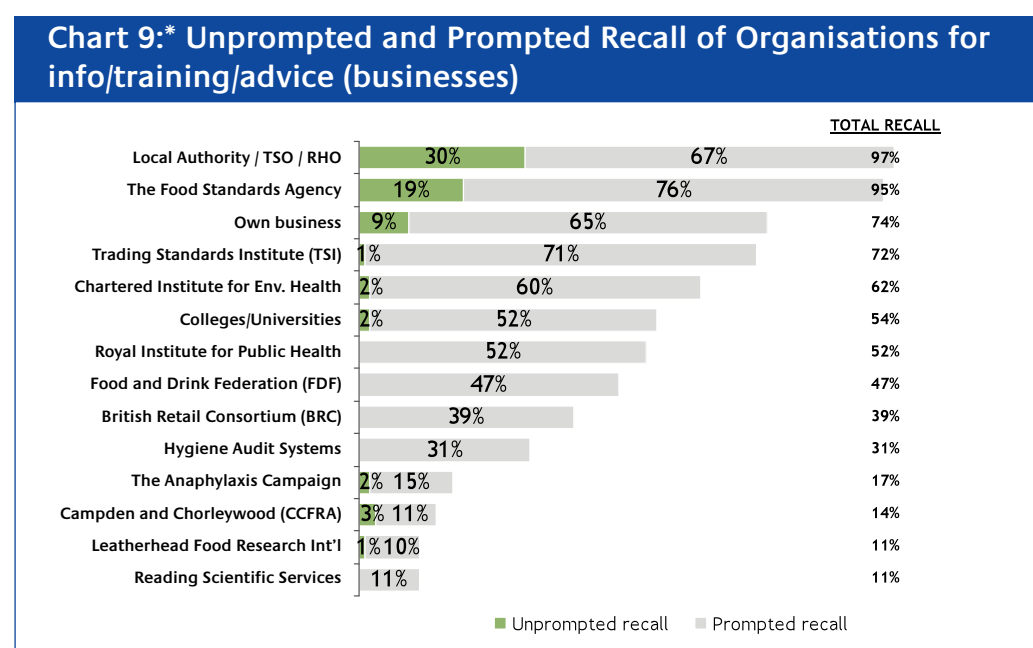
With regard to improving awareness amongst the businesses that guidance is aimed at, Enforcement Officers give considerable support to a national advertising campaign, especially TV as it is felt that this would get the public interest (the premise being that public demand is important in inducing businesses to take action). Advertising in relevant sector publications is also a popular suggestion – especially if this were done via trade magazines and publications.

Some Enforcement Officers think that the guidance should just be mailed out to businesses or promoted via local authorities / environmental health. A few had the idea that allergens might be a good topic for Food Safety Week.

4.5. Perceptions of the FSA

Businesses were asked which organisations came to mind for food allergen information, training or advice in non pre-packed food. This was asked unprompted and then prompted. One in five businesses spontaneously mention the FSA* and almost all (95%) recall the Agency following a prompt (Chart 9).

Chart 9 shows that Local Authorities, EHO, TSO have the highest level of recall (97% overall), with almost a third (30%) mentioning these spontaneously.



Base = All caterers/retailers from screening data (254); Qs -S3a, S3b

Just under 1 in 10 cite their “own business” spontaneously as a source for food allergen information, advice or training and we can speculate that this is perhaps a combination of perceived common sense, staff experience and head office instruction where applicable.

Several organisations receive high prompted recall (more than 50% prompted awareness for the Trading Standard Institute, Chartered Institute for Environmental Health, Colleges/Universities and the Royal Institute for Public Health). Caterers are more likely than retailers to recall colleges/universities (63% vs. 44%).

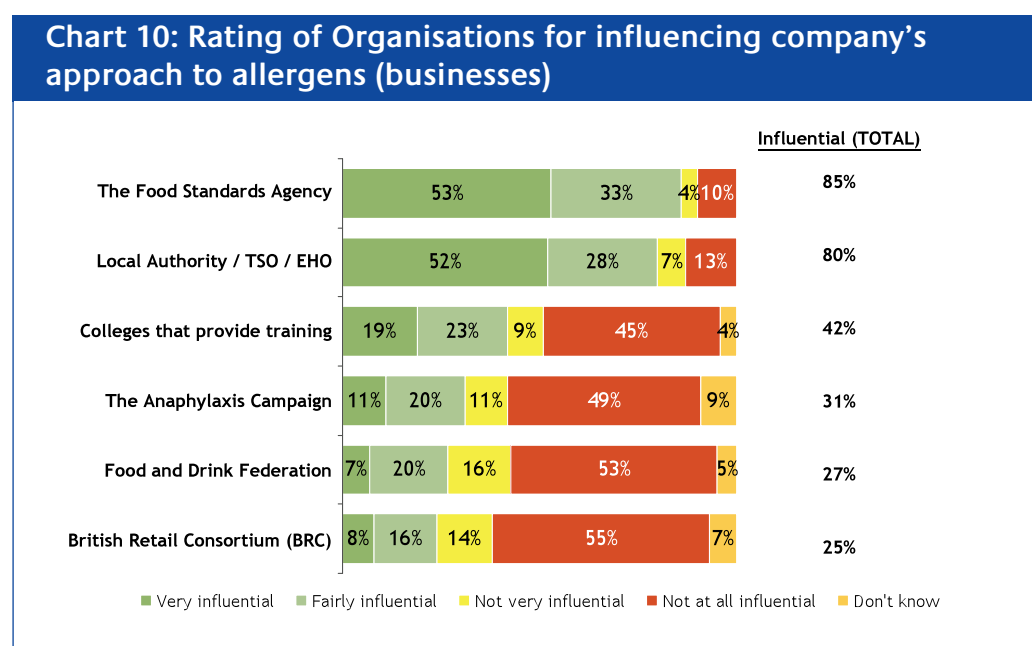
Two trade bodies stand out in terms of overall awareness: the Food & Drink Federation (FDF) and the British Retail Consortium (BRC). Large businesses are more likely to be aware of the FDF (71% vs. 47% overall), and retailers (not surprisingly) more likely than caterers to recall the BRC (47% vs. 32%).

* FSA was introduced upfront as the survey sponsor, which may have artificially boosted unprompted awareness; therefore, this percentage needs to be treated with caution.

Businesses were asked to name other organisations not listed in the original question. Retailers are likely to talk about their suppliers and also trade associations – notably the National Federation of Meat Traders and the National Association of Master Bakers.

Caterers are more likely to mention a wider variety of other sources of information, training and advice e.g. the Internet, specific allergy organisations (e.g. Coeliac UK), private consultants. Where applicable, some caterers also rely upon advice and instruction from head offices – and this element will need to be borne in mind when considering the cascading of information from agencies like FSA to those working on the front line of food preparation.

Businesses were then asked to rate different organisations in terms of how influential they are upon a company’s approach to allergens. Chart 10 shows that the FSA is seen marginally as the most influential organisation (although for micro businesses the local authority/EHO/TSO is slightly more so).



Base = All caterers/retailers (264); Qs – Q14a

85% of businesses overall feel that the FSA is influential (over half feel the agency is “very influential”). This is higher amongst those aware of the guidance (94% vs. 73% amongst those unaware) and among caterers (89% vs. 77% amongst retailers). Micro businesses are slightly less likely to describe the FSA as influential compared with other business sizes (81% vs. 85% overall, and vs. 95% of large businesses).

A similar proportion (80%) sees their local authority/TSO/EHO as influential, with 52% finding it “very influential”. This is higher amongst those aware of the guidance (88% vs. 69% amongst those unaware) and amongst micro businesses (87% vs. 80% of small, 72% of medium and 68% of large businesses).

Other listed organisations are generally seen as not very or not at all influential for over half of businesses. Caterers are more likely than retailers to accord influence to training colleges, The Anaphylaxis Campaign and the Food & Drink Federation, although they give equal endorsement to the British Retail Consortium.

Those aware of the guidance are more likely to describe these other listed organisations (i.e. training colleges, The Anaphylaxis Campaign, the Food & Drink Federation, the British Retail Consortium) as influential than those who were previously unaware of the guidance; perhaps suggestive of a general difference in holistic knowledge about issues and the support system of organisations around them. It may be that those unaware of the guidance are also unaware of a number of relevant issues and of the existence of organisations available for support, and therefore it will be even more important in future to ensure that such businesses aren’t left behind in the communication process.

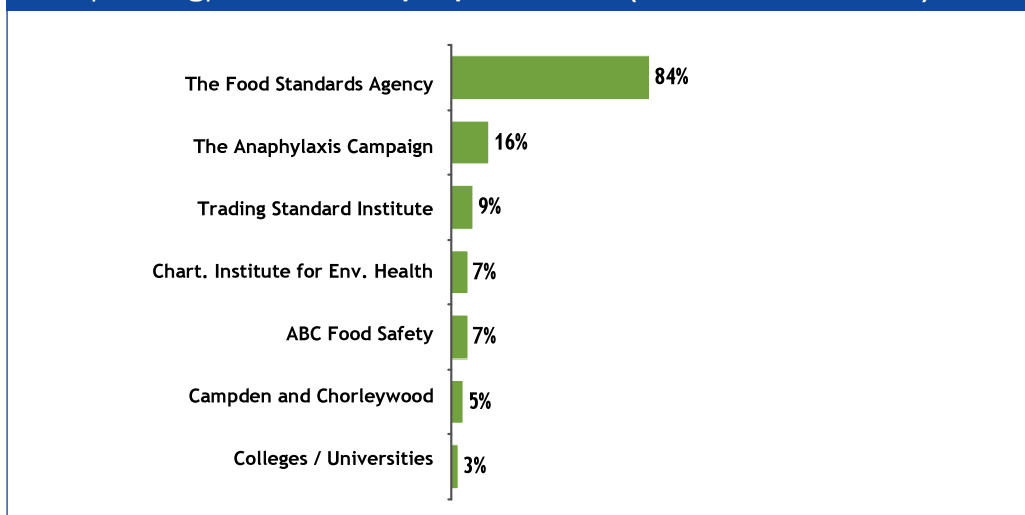
Enforcement Officers were asked similar questions about their awareness of organisations that provide allergen information, training or advice, and their relative level of usage of such organisations.

Charts 11 and 12 show that the FSA is clearly the most prominent and widely used organisation among Enforcement Officers for issues related to food allergens in non pre-packed food.

Chart 11 shows that 84% of Enforcement Officers spontaneously* mention the FSA as an organisation that provides allergen information, training or advice in non pre-packed food. 16% mention the Anaphylaxis Campaign, but otherwise spontaneous awareness of other organisations is low (less than 10%). Chart 12 shows that following a prompt, almost all Enforcement Officers (99%) have ever used the FSA for information on this issue and that 80% rate the Agency as the most useful organisation.

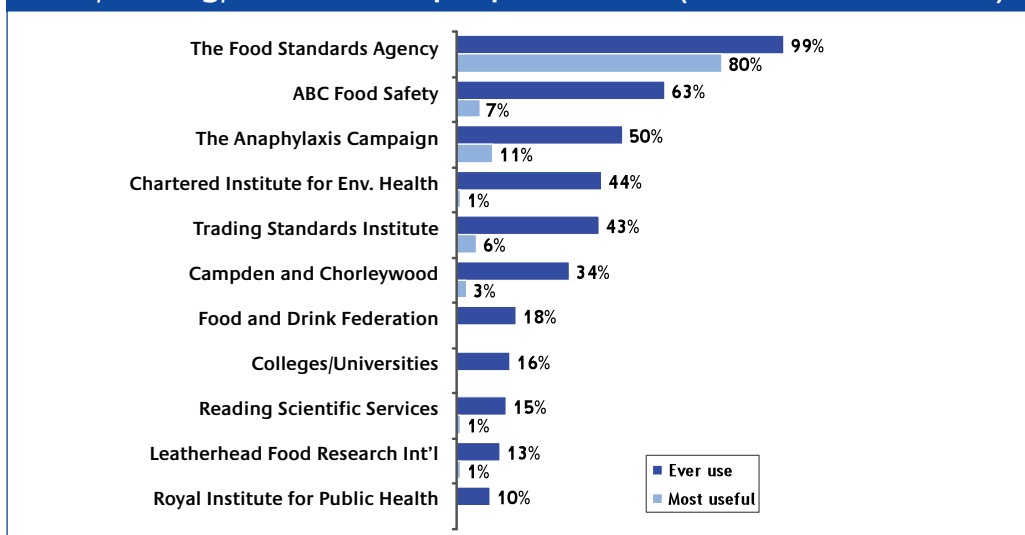
* FSA was introduced upfront as the survey sponsor, which may have artificially boosted unprompted awareness; therefore, this percentage needs to be treated with caution.

Chart 11: Unprompted awareness of organisations that provide allergen info/training/advice in non pre-packed food (Enforcement Officers)



Base = All Enforcement Officers (123); Qs –Enforcement Officers: Q9, Q10, Q11

Chart 12: Prompted usage of organisations that provide allergen info/training/advice in non pre-packed food (Enforcement Officers)



Base = All Enforcement Officers (123); Qs –Enforcement Officers: Q9, Q10, Q11

Approximately 4 in 10 food businesses and 7 in 10 Enforcement Officers claim to have had some training, advice or feedback on allergens in non pre-packed food in the last few years. Amongst food businesses, this incidence is lower amongst those unaware of the guidance, retailers and micro businesses.

For food businesses, this training comes from myriad sources and is most likely to have been via EHOs (13%), internal training or from colleagues (12%), from the FSA (10%), via the Local Authority (9%) or a specialist training provider (8%) or training college (8%).

Amongst Enforcement Officers, there are three key learning sources. 42% received direct training or advice at external training courses (half say this was from the FSA). 41% received indirect training or advice from colleagues who had attended courses, and 14% had received direct training or advice at internal training courses.

In terms of usefulness, external training is seen by many Enforcement Officers to be the ideal, and several praised a particular trainer.

“I thought it was great. It was one of the best courses I’ve been on. There was lots of information given and the trainer was excellent. It was easy to digest the facts.” Enforcement Officer

Feedback, although not perhaps as good as learning or training done first hand, can also be an important tool for raising awareness and stimulating discussion amongst colleagues.

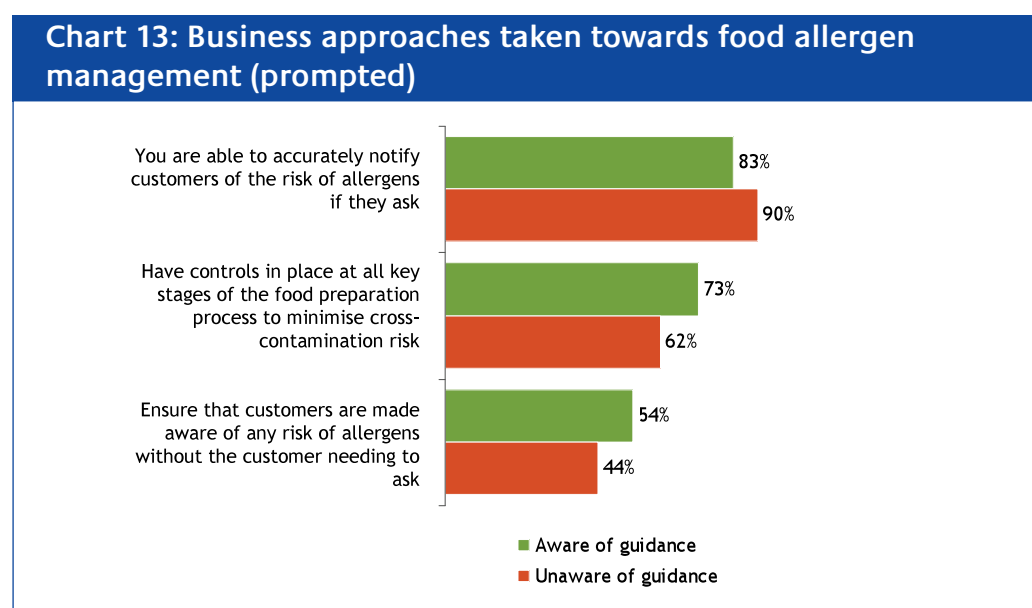
4.6. Systems and procedures in place regarding allergen management and the notification of customers

Caterers and retailers were asked what systems and procedures they currently had in place when preparing non pre-packed food and for notifying customers about allergens. Most businesses tend to be doing something with regards to the allergen controls they have in place and in notifying customers, but there is evidence to suggest that many are doing the bare minimum.

On the whole, most businesses believe they are doing enough in terms of the systems they have in place when preparing foods and controlling allergens, although they tend to refer to typical cross-contamination controls rather than specific allergens measures e.g. coloured chopping boards for different food types, keeping raw and cooked meat separate etc. Businesses also feel they are doing enough in terms of making customers aware of allergens. However, the majority are only specifying when asked by customers (a few make allergens clear upfront, either verbally or written).

The research found no major differences between those aware or unaware of the guidance with regard to having systems and procedures in place. Caterers generally seemed more up to speed than retailers, the latter being more reliant on those supplying products (and in some cases implicitly placing the responsibility on those suppliers to provide adequate labelling).

Caterers and retailers were asked specifically if certain statements applied to them with regard to having controls in place and their ability to notify customers. Chart 13 shows that most businesses are confident that they have controls in place and are able to notify customers (if asked). There is some evidence that those aware of the guidance have more controls in place and that there is more of an element of proactivity in their notification of customers.



Base = All Caterers & Retailers (255); Q5 - Q9

Almost three-quarters (73%) of those aware of the guidance say they have controls in place at all key stages of the food preparation process (to minimize cross-contamination risk), compared with 62% of those unaware of the guidance.

More than 8 in 10 businesses feel that they are able to accurately notify customers of the risk of allergens if asked by those customers, but only half of businesses ensure that customers are made aware of any risks proactively (i.e. without the customer needing to ask).

Looking at different types and sizes of business, retailers are more likely than caterers to ensure that customers are made aware of any risk of allergens without the customer needing to ask (57% vs. 47%).

Large businesses are more likely than SME businesses to agree that they are able to accurately notify customers of the risk of allergens if they ask (95% vs. 83-85%). Caterers are more likely to agree with this than retailers (88% vs. 81%).

Businesses were asked to expand upon their activities and procedures in preparing non pre-packed food and notifying customers about allergens, and the next section details these for caterers and retailers. Overall, most have some systems or procedures in place although these are more to do with food hygiene than allergens and there is a feeling that the onus is on the customer to make any problems clear (although businesses are prepared to deal with allergens issues).

Generally, those aware of the guidance have marginally more controls in place when preparing allergens and there is more evidence of those aware of the guidance using labelling and posters/signage for customers.

4.6.1. Caterers

Most are following what they would describe as standard procedure on the separation of foods to protect against cross-contamination, i.e. not specifically linked to allergens. Respondents talk in terms of having awareness about the need to separate raw from cooked, hot from cold, meat from other foods. Many are using separate colour coded chopping boards and different knives for different foods. Some have separate fridges, storage and preparation areas for different food types. Several also talk about general hygiene e.g. wearing blue hygiene gloves and being vigilant about washing hands and equipment.

“I follow standard procedures on separation of foods, areas and utensils, plus cleaning routinely” Caterer

“We follow normal standard procedures, such as separation of raw and cooked foods, separate prep boards and knives and forks” Caterer

Some caterers are following HACCP principles or Safer Food Better Business guidelines, and some have regular training in place. Others have books, guides or posters up in the kitchen or make use of recipe books containing information about allergens. Compared to those caterers unaware of the 2008 guidance, those aware are somewhat more likely to be following HACCP, Cook Safe or Safer Food Better Business guidelines and to have regular training in place. There is an element of guidance from Head Office in several cases.

A small number have nothing specific in place, or say that they simply “use common sense” or rely upon experience. This state of affairs is somewhat less likely amongst those aware of the 2008 guidance.

With regard to identifying customers with food allergies; for some the onus is on the customer to tell staff, others ask upfront, but most feel they can work around such allergies. Some have labels and notes on menus (most commonly for nuts), and some

have separate areas to prepare the food specifically for these customers. Nuts are the key allergen that caterers are taking action about e.g. strict separation, notes on menus, labelling.

“We have colour coded boards. Nuts are kept in an airtight container” Caterer

“Allergens are prepared in a separate part of the kitchen. We handle allergens the same way in which we would raw meat to avoid cross-contamination. They are stored separately” Caterer

“For our gluten free pizza we have separate area and separate stone in the oven. We also use separate chopping boards” Caterer

Although some caterers will ask customers upfront about allergens (on booking, on ordering) or alert / tell them about allergens (especially nuts) in menu items, most feel it is up to the customer to tell them about allergens. In most cases this is what usually happens, and caterers seem happy with this status quo (from the perspective of the caterer, there is no feeling that customers have a problem with it).

“We just use a common sense approach and wait for them to tell us of their problems with allergens” Caterer

Many have started labelling menus with text or symbols either with reference to specific allergens (notably nuts but also dairy and gluten for some), or that customers should approach staff with any dietary requirements. There is some evidence that disclaimers are becoming more prevalent e.g. “we can’t guarantee...” – either to cover the caterer or to prompt customers to ask questions or state their food allergies upfront.

“We ask them if they have any allergies. Our menus state what allergens may be in the food and asks them for requests if they have any allergies.” Caterer

“We state on our menu 'may contain nuts' that is all” Caterer

“If a specific item is suspect then it is listed on the menu. We also have the standard disclaimer on bottom of the menu” Caterer

Some expand that their staff are trained to know what all menu items contain, and what allergies customers might have, so they encourage customers to engage with staff on the topic.

“A lot is down to waiters’ knowledge; we train all staff on what ingredients are in our dishes and update them every time a dish is changed. Also the customers will ask for advice on what is in the dishes if they have a particular allergy” Caterer

“It says at the bottom of our menu that our food may contain nuts and if customers have any other allergies to inform us” Caterer

There is some evidence of more labelling and putting up of posters and signage amongst those aware of the 2008 guidance than those unaware.

“We do have food safety allergen notices for customers to see. If they ask we can inform them of what ingredients are contained in the food” Caterer

4.6.2. Retailers

With regard to systems or procedures in place when preparing non pre-packed food, there are three levels prevalent amongst retailers (who generally are somewhat less likely than caterers to have specifics in place):

Several are following HACCP (more so than caterers) in terms of documentation, labelling and training.

“Full HACCP in operation, we look for all hazards and have controls in place to make sure there is no cross contamination.” Retailer

“We have a full HACCP plan in place and a risk assessment is carried out. We check the labelling of dry ingredients and we do segregate products. All containers are clearly labelled” Retailer

Others (like many caterers), are following what they would describe as standard general hygiene procedure e.g. separate knives, chopping boards, preparation areas; temperature control; cleanliness, general hygiene and the wearing of gloves.

“Just segregation. We prepare different products in separate areas, and each have their own utensils and trays. That's all” Retailer

“We have some clear guidelines including, appropriate cleaning procedures and cleaning after preparing different products. We prepare and have guidelines, and we use dedicated utensils which we use to reduce potential risk of cross contamination” Retailer

A few don't feel very affected as food is bought in from suppliers. The onus seems to be on these suppliers to label allergens effectively. Alternatively some don't sell the kinds of food typically associated with cross-contamination.

“We don't have any procedures in place, we do the hygiene thing which we have to do of course, but nothing related to allergens” Retailer

“The pies are brought in so it's down to the supplier to supply labels with ingredients on” Retailer

“We have labelling with the allergens detailed as supplied by our supplier” Retailer

Regarding notification of customers about allergens in certain foods, retailers rely very much on labelling – their own, existing from suppliers or a combination of both. Those aware of the 2008 guidance seem to be somewhat more proactive about labelling than those unaware.

“We label all of our foods. Any companies that provide us with foods label the foods and we take note of that” Retailer

“We have a full and comprehensive labelling system that details all ingredients and allergens that are handled” Retailer

There is some feeling that it's a “job done” in terms of responsibility / liability if the supplier has labelled the items. Some label to protect and cover themselves (e.g. disclaimers like “we can't be 100% sure this doesn't contain XYZ”) but most seem to be being proactive about addressing the issue of allergens.

Like caterers, the onus is placed upon the customer to tell the retailer about allergies. Retailers are less likely than caterers to ask upfront and several hold the assumption that customers with known allergies will not buy food containing those allergens. There is a feeling that there is generally more awareness about allergens these days amongst the public. Some mention that staff are trained about allergens and like to think that customers would approach staff if uncertain.

“Most of it is verbal, we have a few signs saying that some items contain nuts, but we rely on our customers to ask or inform us if they have any allergies” Retailer

Several do have signs, leaflets or posters available for both staff and customers to refer to. Those aware of the 2008 guidance are more likely to be doing this than those unaware. The signage is generally in shops or specifically at point of sale.

“We have posters around the shop warning customers that items may contain nuts or dairy. They're easy to understand and simple to read, and other than that, all of our staff know what's in the products we sell, so they can give customers any information they need” Retailer

“All the shops have notices up warning customers that the products are not guaranteed to be nut free. If a customer asks what is in a product and the staff are not sure the staff member will call head office to confirm the ingredients used” Retailer

“We have signs on the walls to make customers aware there is a possibility of allergens within the food” Retailer

Some don't have any systems or procedures in place for notifying customers either because they feel it's up to the customer to raise the issue or that the products they mainly sell are less applicable in an allergens context.

5. Conclusions and Recommendations

5.1. Conclusions

Unlike the pre-packed foods guidance research, it is clear that allergens management and notification is not as high a priority among caterers and retailers. Businesses are more focused on general issues relating to food hygiene and safety. The information and training they receive tends to be dominated by these issues. Additionally, allergens action is not a legal requirement (unlike hygiene).

This is reflected in the awareness of the guidance which is low at 25% (and lower still among micro businesses – 18%), compared with 53% awareness of the 2006 pre-packed allergens guidance (among food manufacturers in a 2008 survey).

However, there is evidence to suggest that businesses (and Enforcement Officers) are increasingly treating the issue more seriously; due to an increased number of allergens scare stories, Enforcement Officers treating the issue more seriously and the impact of the guidance documents themselves.

The guidance itself is highly rated with very few criticisms. The only suggestions for improvement included the addition of more case studies and practical examples (perhaps encompassing different sizes and industries of business), and (contradicting this) reducing the full guidance in size (possibly producing something more comprehensive than the leaflet but less so than the full guidance).

Many of those businesses who were aware of the guidance have made or are planning to make changes, ranging from simply checking that current procedures and customer/staff notification policies are in order towards a complete revamp of controlling allergens and notifying customers/staff.

Although there were no major differences by business size, it is clear that smaller businesses (especially micro businesses) struggle with these issues more than larger businesses. This is due to an over-reliance on Enforcement Officers to educate them, a general lack of time and resource, the relative expense of implementing changes and owners being more focussed on survival than usual. This means that although they focus time and effort on hygiene issues, they spend less time on allergen related issues.

Enforcement Officers are reading the guidance and, in the main, using the full guidance to increase their own knowledge in this area and the leaflet to guide businesses and hand over to the business as a 'leave-behind'.

5.2. Recommendations

No major changes need to be made to the full guidance, leaflet or poster.

The key issue for the FSA is to boost awareness and usage of the guidance among both Enforcement Officers and businesses, by:

Stressing the importance of allergen controls and customer notification in non pre-packed foods

Many businesses become more engaged when they hear scare stories about customers suffering allergic reactions and/or businesses being taken to court in relation to these types of events. There is also evidence that some Enforcement Officers adopt this approach in order that businesses take them seriously.

Ensuring as many businesses as possible are aware of the guidance

Firstly the FSA must convince Enforcement Officers of the important of this issue (relative to other issues for which they have responsibility).

Secondly, the FSA should attempt to make businesses aware directly, possibly via trade associations and trade publications.

In the longer term, increasing consumer awareness in the expectation of this leading to higher levels of business engagement

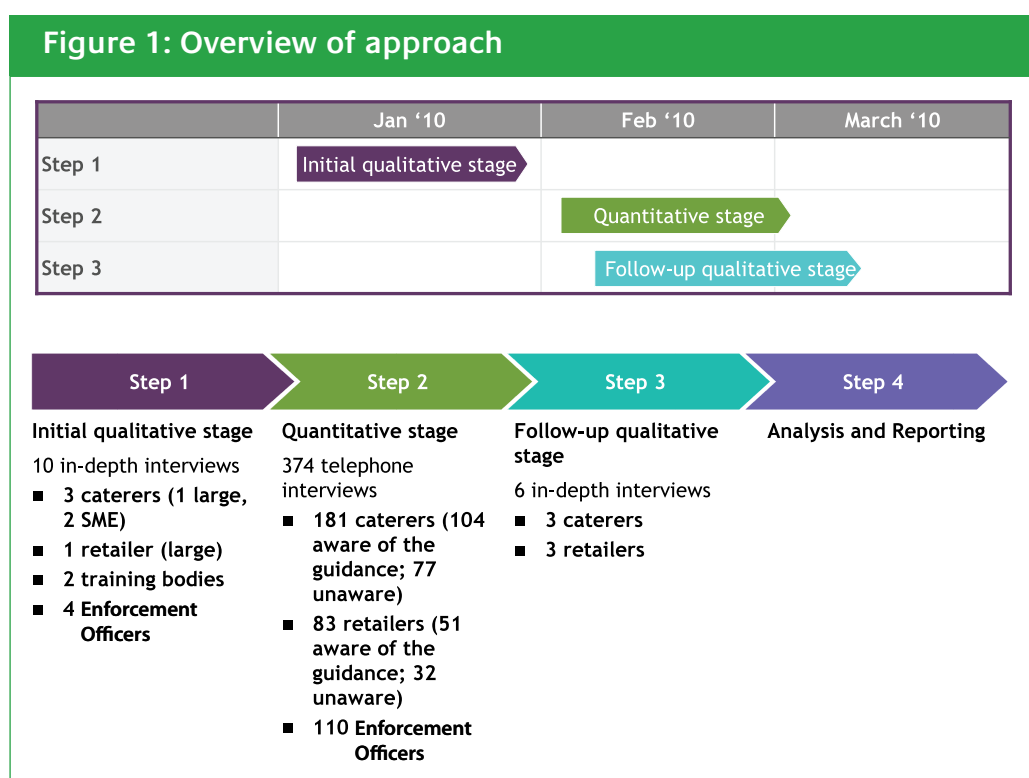
Evidence suggests that pressure from consumers is highly influential in achieving behavioural change in businesses. If more customers are aware of potential allergens, this may encourage dialogue with caterers and retailers.

Remember of course that those who work in business are also consumers themselves, and therefore general communications will reach them in both contexts.

Ideas from respondents in this research ranged from the expensive (TV advertising) through PR to some ideas more directly controllable by the FSA e.g. having allergens issues as part of Food Safety Week.

Appendix 1 – Detailed Methodology

Figure 1 summarises when interviewing took place.



In-depth interviews

A total of 16 in-depth telephone interviews were completed during the study: 10 pre-quantitative and 6 as follow-up to the quantitative stage.

These interviews break down as follows:

- 10 food businesses handling non pre-packed food and handling foods with allergens
 - 6 Caterers (1 large, 5 SME); (4 aware of the guidance, 2 unaware)
 - 4 Retailers (1 large, 3 SME); (2 aware of the guidance, 2 unaware)
 - Mix of micro (<20 employees), small (20-49 employees) and medium (50-249 employees)
 - Mix of countries (England, Scotland, Wales & Northern Ireland)

Respondents had to be fully or partly responsible for the business's handling of food allergens within the business

- 2 Training Bodies / Colleges
 - Respondent had to train food businesses and cover the issue of loose food allergens within aspects of their training
- 4 Enforcement Officers
 - Respondent had to have some responsibility for advising local businesses about handling food allergens for non pre-packed food
 - 2 EHOs and 2 TSOs
 - 1 from each country (England, Scotland, Wales & Northern Ireland)

This stage examined relevant topics in-depth, enriching the quantitative responses but also informing the quantitative research design.

All in-depth interviews lasted approximately 45 minutes. All three discussion guides are included in the appendix at the end of this report.

All interviews were audio recorded and analysed by the Jigsaw Research project team.

Quantitative telephone survey

A total of 374 telephone (CATI) interviews were conducted by a specialist fieldwork agency, Critical Research. The interviews were conducted as follows:

- **264 food businesses handling non pre-packed food and handling foods with allergens.**

The respondents had to be fully or partly responsible for the business's handling of food allergens within the business. All had to be either aware of either the full guidance or leaflet or unaware (but agree to be sent guidance and interviewed later). Quotas were set on company size, country and awareness of guidance.

- 155 aware of guidance; 109 unaware, but sent the Guidance prior to being interviewed
- 181 caterers (104 aware of the guidance; 77 unaware)
- 83 retailers (51 aware of the guidance; 32 unaware)
- 128 micro businesses, 46 small businesses, 46 medium businesses & 44 large businesses
- 132 England, 44 Scotland, 45 Wales and 43 Northern Ireland

- **110 Enforcement Officers.**

Respondent had to have some responsibility for advising local businesses about handling food allergens for non pre-packed food.

- 72 in England, 10 in Scotland, 13 in Wales, 15 in Northern Ireland
- 71 EHOs and 33 TSOs
- Mix of Local Authorities (County Councils, District Authorities and Unitary Authorities)

Business interviews lasted approximately 20 minutes while Enforcement Officer interviews lasted approximately 30 minutes. Both questionnaires are included in the appendix at the end of this report. Data tables were generated from these interviews and subsequently analysed by the Jigsaw Research project team.

The quantitative stage also included a large number of open-ended questions, and these verbatim responses were analysed “qualitatively” in order to capture the deeper perceptions behind ratings and opinions given by survey respondents.

Businesses that were unaware of the guidance were posted a copy of the guidance, leaflet and poster (or in a few cases, asked to access these documents on the FSA website). Those businesses aware of the guidance had to rely on their memory of reading the guidance or, in a few cases, refer to copies they still had to hand at the time of the call.

Appendix 2 – Questionnaires

Jigsaw Research, 13-14 Margaret Street, London, W1W 8RN

100094

– FOOD STANDARDS AGENCY –

NON-PRE-PACKED FOOD ALLERGENS RESEARCH QUESTIONNAIRE

CATERERS AND RETAILERS

Interviewer Name: _____ I.D. No. _____

Respondent Name: _____

Business Name and Address: _____

Postcode: _____ Telephone No: _____

INTERVIEWER DECLARATION

I declare that this interview has been conducted strictly in accordance with your specifications within the MRS Code of Conduct and with a person totally unknown to me.

Signed (INTERVIEWER): _____ Date _____

INTRODUCTION

Good morning/afternoon. My name is _____, from a company called Critical Research. We are conducting a survey on behalf of the Food Standards Agency among both caterers and retailers who prepare and/or sell food to the general public to find out how they handle food safety and, in particular, food allergens in non pre-packed foods.

Ask to speak to person fully or at least partly responsible for the business's handling of food safety within the business.

Your answers will be treated in confidence and not reported back in a way that identifies you by name. Your answers will be put together with those from many other businesses to give an overall picture.

No-one will try to sell you anything as a direct result of this survey, and the survey is not designed to test your knowledge, but to gauge your opinions.

NEED TO KEEP RECORD OF NUMBER OF PEOPLE UNABLE TO CONDUCT INTERVIEW DUE TO LANGUAGE DIFFICULTIES

SCREENING QUESTIONS

KEEP RECORD OF BUSINESSES UNABLE TO TAKE PART DUE TO POOR ENGLISH

Unable to complete interview1	CLOSE
Able to complete interview2	CONTINUE

S1a Can I just check that your business sells any non pre-packed food? **SINGLE CODE**

Yes1	CONTINUE
No2	CLOSE

S1b And do you need to consider issues related to food allergens? **SINGLE CODE**

Yes1
No2

S1c Which of the following ingredients, if any, do you ever use in any of the non pre-packed foods that you prepare? **READ OUT – MULTICODE**

Cereals containing gluten such as wheat, rye, barley, oats, spelt, kamut and foods containing ingredients made from these cereals, such as bread, pasta etc1	CONTINUE
Shellfish (e.g. prawns, crab, Lobster, mussels, squid, snails)2	CONTINUE
Egg4	CONTINUE
Fish5	CONTINUE
Lupin – usually used as a flour in some types of bread and pastries6	CONTINUE
Peanuts7	CONTINUE
Milk8	CONTINUE
Nuts (if necessary: including almond, hazelnut, walnut, cashew, pecan nut, Brazil nut, pistachio nut, macadamia nut, Queensland nut)9	CONTINUE
Soya10	CONTINUE
Sesame seeds11	CONTINUE
Celery and or celeriac12	CONTINUE
Mustard13	CONTINUE
Sulphur dioxide/sulphites – sometimes found in meat products, fruit juice, dried fruit and vegetables14	CONTINUE
None of the above (DO NOT READ OUT)15	CLOSE

S2a And can I just check that you are the person fully or at least partly responsible for the business's handling of food allergens / safety (USE 'SAFETY' RATHER THAN 'ALLERGENS' IF CODE 2 AT S1b) within the business? **SINGLE CODE**

Yes	1	CONTINUE
No	2	ASK TO SPEAK TO RELEVANT PERSON

IF LARGE BUSINESS AND RESPONDENT SEEMS HESITANT AND MAKES IT CLEAR THAT MORE THAN ONE PERSON HANDLES THIS ROLE, THEN READ OUT THE FOLLOWING (OTHERS SKIP TO S3a)

For a few large businesses we have interviewed so far, issues related to food allergens are managed by more than one person. In this interview we will be covering the following areas:

- The systems or procedures you have in place with regards to the management of food allergens in non pre-packed foods
- Any training or advice you may have received on this issue
- Your opinion on the different organisations that specialise in this area
- Your views on a Food Standards Agency publication called voluntary best practice guidance on the provision of Allergen Information for Non Pre-packed foods.

Do you think you would be able to answer the questions in this survey or would you need to consult with any other colleagues beforehand? We could email you a PDF version of the questionnaire and the phone you back at a later date once you have consulted with your colleagues? (IF RESPONDENT WOULD PREFER TO COMPLETE QUESTIONNAIRE AND POST BACK – THIS IS FINE ALTHOUGH WE SHOULD TRY AND KEEP THESE TO A MINIMUM)

S3a When thinking about organisations providing information, advice or training about food allergens in non pre-packed foods, which ones come to mind? **DO NOT READ OUT - MULTICODE**

S3b And which of the following organisations are you aware of that provide information, advice or training about food allergens in non pre-packed foods? **READ OUT - MULTICODE**

– ROTATE ORDER

	S3a	S3b
The Food Standards Agency1	.1
Your local authority / Trading Standards Officers /		
Environmental Health Officers2	.2
The British Retail Consortium (BRC)3	.3
Leatherhead Food International4	.4
Campden and Chorleywood Food Research Association		
(CCFRA)5	.5
Hygiene Audit Systems6	.6
The Chartered Institute for Environmental Health (CIEH)7	.7
The Royal Institute for Public Health8	.8
Reading Scientific Services9	.9
Trading Standards Institute (TSI)10	.10
Food and Drink Federation (FDF)11	.11
The Anaphylaxis Campaign12	.12
Colleges / Universities13	.13
Your own business14	.14
None15	.15
Don't know16	.16
Other (specify)17	

S4a In 2008, the Food Standards Agency published voluntary Best Practice Guidance on the Provision of Allergen Information for Non Pre-Packed Foods. This guidance provides voluntary best practice advice to help food retailers and caterers selling food that is not pre-packed, and provide allergen information on the food they sell. This full guidance was also accompanied by a leaflet and a poster. If you go to the following webpage: www.critical.co.uk/guidance you will be able to see what the full guidance and its contents page look like, as well as the leaflet and the poster.

IF UNABLE TO ACCESS LINK SAY: The full guidance is a 50 page A4 booklet with an orange and white front. The leaflet is much smaller and has a drawing of foods like French bread, sandwiches, cheese etc on a counter next to a till. The poster is called 'Think Allergy' and has a cartoon story of a customer asking a staff member in a shop about whether a sandwich contains any egg in it.

Are you aware of any of these documents? **MULTI CODE**

Yes, aware of full guidance1	QUOTA
Yes, aware of leaflet2	QUOTA
Yes, aware of poster3	QUOTA
No, not aware of any4	QUOTA
Don't know / can't remember5	QUOTA

IF UNAWARE OR DK:

- 1) ARRANGE TO SEND DOCUMENTS VIA EMAIL LINK/POST. IF REFUSE TO BE SENT DOCUMENTS THEN CLOSE.
- 2) THEN ASK QUESTIONS S5-7
- 3) THEN STOP INTERVIEW AND AGREE TO CONTINUE INTERVIEW AT LATER DATE

IF AWARE OF FULL GUIDANCE AND LEAFLET AT S4a, THEN ASK S4b

S4b Do you think you are more familiar with the full guidance or the leaflet? **SINGLE CODE**

- | | | |
|---------------------|---|-------------------|
| Full guidance | 1 | SKIP TO SECTION 1 |
| Leaflet | 2 | SKIP TO SECTION 1 |

IF UNAWARE OF FULL GUIDANCE AND LEAFLET AT S4a, THEN ASK S5-7

S5 How useful do you think it would have been to have had access to these documents over the last 2 years? Do you think it would have been...**SINGLE CODE – IF NECESSARY RE-READ DESCRIPTION OF GUIDANCE FROM S4a**

- | | |
|------------------------------------|---|
| Very useful | 1 |
| Fairly useful | 2 |
| Not very useful | 3 |
| Not at all useful | 4 |
| Don't know (DO NOT READ OUT) | 5 |

S6a What systems or procedures, if any, do you have in place when preparing non pre-packed food, particularly in terms of risk assessment and controlling allergen cross-contamination? **WRITE IN**

S6b What systems or procedures, if any, does your business have in place with regards to notifying customers about allergens in certain foods? **WRITE IN**

S7 From whom do you tend to get your information about food allergens in non pre-packed foods? **DO NOT READ OUT - SINGLE CODE**

The Food Standards Agency	1
Your local authority / Trading Standards Officers /	
Environmental Health Officers	2
The British Retail Consortium (BRC)	3
The retailer/s that you supply	4
Food Research Organisations e.g. Leatherhead, Campden	5
Hygiene Audit Systems	6
The Royal Institute for Public Health	7
The Chartered Institute for Environmental Health /	
Trading Standards Institute	8
Food and Drink Federation (FDF)	9
The Anaphylaxis Campaign	10
Colleges / Universities	11
Staff/colleagues at work	12
From customers / Customer audits	13
The Internet	14
None – don't get information	15
Other (specify)	16

SECTION 1 – RESPONDENT/BUSINESS PROFILE

Say: Before I ask you questions about how you handle issues related to food allergens in non pre-packed foods, I'd like to ask you a few questions about your role within the organisation and the organisation itself.

Q1 What is your job title? **SINGLE CODE**

Proprietor/owner	1
Manager	2
Head Chef	3
Technical Manager / Director	4
Legal Compliance Manager	5
Quality (Assurance/Control/Issues) Manager	6
Other (specify)	6

Q2 And for how long have you been the person fully or at least partly responsible for the business's handling of food allergens / safety (USE 'SAFETY' RATHER THAN 'ALLERGENS' IF CODE 2 AT S1b) within the business? **SINGLE CODE**

Under 1 year	1
1 - 2 years	2
3 – 4 years	3
5 – 9 years	4
10 years or longer	5
Don't know	6

Q3 How many different premises does your business have in total that sell non pre-packed foods? **SINGLE CODE**

1 only	1
2	2
3	3
4	4
5 or more	5
Don't know	6

Q4 Approximately how many employees work for the organisation as a whole in the UK? **SINGLE CODE**

1 employee	1
2-5 employees	2
6-10 employees	3
11-20 employees	4
21-49 employees	5

50-249 employees	6
250 or more employees	7
Don't know	8

Q5 LOCATION OF BUSINESS WHERE RESPONDENT IS BASED - SINGLE CODE – DON'T NEED TO ASK – CODE FROM SAMPLE

North East	1
North West	2
East Midlands	3
West Midlands	4
East of England	5
South East (excluding Greater London)	6
Greater London	7
South West	8
Yorks/Humber	9
Scotland	10
Wales	11
Northern Ireland	12

Q6a What type of establishment is your company? DO NOT READ OUT AND SINGLE CODE

Catering (DO NOT READ OUT)

Restaurant or cafe	1
Takeaway	2
Mobile café/takeaway	3
Hotel or guest house	4
Home caterer/delivery	5
Pub or club	6
School/college	7
Care home or nursery	8
Sandwich bar	9

Retail (DO NOT READ OUT)

Greengrocer	1
Butcher	2
Bakery	3
Newsagent/corner shop	4
Convenience store/mini-market	5
Small supermarket	6
Other (SPECIFY)	X

SECTION 2 – SYSTEMS OR PROCEDURES USED

Q7 What systems or procedures, if any, do you have in place when preparing non pre-packed food, particularly in terms of risk assessment and controlling allergen cross-contamination?

WRITE IN

Q8 What systems or procedures, if any, does your business have in place with regards to notifying customers about allergens in certain foods? **WRITE IN**

Q9 Which of the following statements, if any, do you think apply to the way you approach the issue of allergens? **READ OUT - MULTICODE**

- You have controls in place at all key stages of the food preparation process to ensure the risk of cross-contamination is minimised . . .1
- You ensure that customers are made aware of any risk of allergens without the customer needing to ask2
- You are able to accurately notify customers of the risk of allergens if they ask3
- None of the above (DO NOT READ OUT)4

Q10 Have you received any training or advice on the issue of food allergens in non pre-packed foods in the last few years?

- Yes1 CONTINUE
- No2 SKIP TO Q14a

Q11 Who has provided this training or advice? **READ OUT AND MULTICODE**

- A colleague or through an internal training session1
- Via a specialist training provider2
- Through a Trading Standards Officer3
- Through an Environmental Health Officer4
- Through contacting your local authority/council5
- Via the Food Standards Agency6
- Via the British Retail Consortium (BRC)7
- Food Research Organisations e.g. Leatherhead, Campden8
- The Anaphylaxis Campaign9
- Food and Drink Federation (FDF)10
- Training colleges11
- Other (specify)12

ASK ALL

Q14a. I am going to read out some similar organisations. For each organisation I read out I'd like you to tell me how influential you think that organisation has been in moulding or changing your approach to food allergens in non pre-packed foods. Again, I'd like you to rate each organisation on a scale of 1-5 where 5 means you think they've been 'very influential' and 1 means you think they've been 'not at all influential'.

So with regards to moulding or changing your organisation's approach to food allergens in non pre-packed foods, how influential would you say (READ OUT FIRST ORGANISATION) has been?

REPEAT FOR ALL ORGANISATIONS – ROTATE ORDER

	Not at all influential	1	2	3	4	Very influential	5
The Food Standards Agency	1	2	3	4	5		
Your local authority / Trading Standards Officers /							
Environmental Health Officers	1	2	3	4	5		
The British Retail Consortium (BRC)	1	2	3	4	5		
Food and Drink Federation (FDF)	1	2	3	4	5		
Colleges that providing training in this area	1	2	3	4	5		
Anaphylaxis Campaign/Allergy UK/Coelic UK	1	2	3	4	5		

SECTION 3 – THE LEAFLET

ASK QUESTIONS IN SECTION 3 IF MOST AWARE OF THE LEAFLET AT S4b (CODE 2) OR CODE 2 AT S4a (AND NOT CODE 1 AT S4a). THOSE UNAWARE OF GUIDANCE BUT SENT GUIDANCE/LEAFLET/POSTER, SKIP TO Q20

Q15 You mentioned at the beginning of the interview that you were aware of the leaflet. When did you first become aware of it? Was it...**READ OUT AND SINGLE CODE**

- In the last 3 months1
- 4-6 months ago2
- 7-12 months ago3
- 1-1 ½ years ago4
- 1 ½ to 2 years ago5
- Don't know / can't remember (DO NOT READ OUT)6

Q16 And how did you become aware of it? **DO NOT READ OUT BUT PROMPT IF NECESSARY - POSSIBLE MULTICODE**

- Found on FSA website1
- Told/Given to by TSO/EHO2
- Told/Given to at training session3
- Told/Given to by the Food and Drink Federation (FDF)4
- Told/Given to by the British Retail Consortium (BRC)5
- Told/Given to by work colleague6
- Told/Given by training college8
- Other (specify)9
- Don't know / can't remember (DO NOT READ OUT)10

Q17 In addition to being aware of it, did you...**READ OUT - POSSIBLE MULTICODE**

- Receive a hard copy in-person or in the post that you specifically requested1 SKIP TO Q19a
- Receive a hard copy in-person or in the post that you didn't specifically request2 SKIP TO Q19a
- Read it on the Internet3 SKIP TO Q19a
- Read it after printing it out from the Internet4 SKIP TO Q19a
- None – didn't receive it or view online5 CONTINUE

Q18 Which of the following best describes why you haven't received it or read it online?

READ OUT - MULTICODE

- You didn't know how to get it1
- You were confident that the procedures you had in place were adequate2
- You thought the leaflet was too brief to be of any use3
- Only been in the role for a short period4
- Other (specify)7
- Don't know / can't remember (DO NOT READ OUT)8

ASK Q19a IF RECEIVED A COPY OF LEAFLET (CODES 1-3 AT Q17), OTHERS SKIP TO SECTION 4

Q19a And which of the following best describes how much of the leaflet you read?

READ OUT AND SINGLE CODE

- | | |
|--|-------------------|
| You read all of it1 | SKIP TO Q20 |
| You read some of it2 | SKIP TO Q20 |
| You only skimmed through it3 | SKIP TO Q20 |
| You didn't read it at all4 | CONTINUE |
| Don't know / can't remember (DO NOT READ OUT)5 | SKIP TO SECTION 4 |

Q19b Why didn't you read it at all? **WRITE IN**

ASK Q20 IF READ LEAFLET (CODES 1-3 AT Q19a) OR UNAWARE AND RECEIVED LEAFLET BY EMAIL/POST, OTHERS SKIP TO SECTION 4

Q20 How useful did you find the leaflet? Would you say it was...**READ OUT AND SINGLE CODE**

- | | |
|--|--------------|
| Very useful1 | CONTINUE |
| Fairly useful2 | CONTINUE |
| Not very useful3 | CONTINUE |
| Not at all useful4 | CONTINUE |
| Don't know / can't remember (DO NOT READ OUT)5 | SKIP TO Q21b |

Q21a Why do you say that? **WRITE IN**

LEAFLET AWARE:

Q21bi What changes, if any, did you make to the way you manage food allergens in non pre-packed foods as a result of reading the leaflet? **WRITE IN**

GUIDANCE UNAWARE (SENT LEALET)

Q21bii What changes, if any, do you think you might make to the way you manage food allergens in non pre-packed foods as a result of reading the leaflet? **WRITE IN**

LEAFLET AWARE:

Q21c And what changes, if any, did you make to the way you notify **customers about food allergens in non pre-packed foods as a result of reading the leaflet?** **WRITE IN**

GUIDANCE UNAWARE (SENT LEALET)

Q21cii And what changes, if any, might you make to the way you notify customers about food allergens in non pre-packed foods as a result of reading the leaflet? **WRITE IN**

Q22. I'd now like you to rate different attributes of the leaflet as very good, good, adequate, poor or very poor. So firstly, how would you rate the leaflet for being: (READ OUT FIRST ATTRIBUTE)?

REPEAT FOR ALL ATTRIBUTES – ROTATE ORDER

	Very Poor	Poor	Adequate	Good	Very good
Easy to read / well laid out	1	2	3	4	5
A good starting point to the whole issue of managing food allergens in non pre-packed foods	1	2	3	4	5
Providing you with all the information you needed . . .	1	2	3	4	5
Easy to apply to your business procedures	1	2	3	4	5
Offering practical solutions	1	2	3	4	5

Q23 – 25 FOR LEAFLET AWARE ONLY

Q23 Before today, did you know that a more detailed guidance on allergen information for non pre-packed foods was available? **SINGLE CODE**

Yes	1	CONTINUE
No	2	SKIP TO SECTION 4
Don't know / can't remember	3	SKIP TO SECTION 4

Q24 And which of the following best describes what you did as a result of being aware of this?

READ OUT AND SINGLE CODE

You decided to read the fuller guidance	1	SKIP TO SECTION 4
ou decided not to read the fuller guidance	2	CONTINUE
Don't know / can't remember (DO NOT READ OUT)	3	SKIP TO SECTION 4

ASK Q25 IF DECIDED NOT TO READ THE FULLER GUIDANCE (CODE 2 AT Q24)

Q25 Why did you decide not to read the fuller guidance? **SINGLE CODE**

SECTION 4 – THE FULL GUIDANCE

ASK QUESTIONS IN SECTION 4 IF MOST AWARE OF THE GUIDANCE AT S4b (CODE 1) OR CODE 1 AT S4a (AND NOT CODE 2 AT S4a). THOSE UNAWARE OF GUIDANCE BUT SENT GUIDANCE/LEAFLET/POSTER, SKIP TO Q31

Say: I'd now like to ask you some questions about the full guidance.

Q26 You mentioned at the beginning of the interview that you were aware of the full guidance. When did you first become aware of it? Was it...**READ OUT AND SINGLE CODE**

- In the last 3 months1
- 4-6 months ago2
- 7-12 months ago3
- 1-1 ½ years ago4
- 1 ½ to 2 years ago5
- Don't know / can't remember (DO NOT READ OUT)6

Q27 And how did you become aware of it? **DO NOT READ OUT BUT PROMPT IF NECESSARY - POSSIBLE MULTICODE**

- Found on FSA website1
- Via leaflet2
- Told/Given by TSO/EHO3
- Told/Given at training session4
- Told/Given to by the Food and Drink Federation (FDF)5
- Told/Given to by the British Retail Consortium (BRC)6
- Told/Given by work colleague7
- Told/Given by training college8
- Other (specify)9
- Don't know / can't remember (DO NOT READ OUT)10

Q28 In addition to being aware of it, did you...**READ OUT - POSSIBLE MULTICODE**

- Receive a hard copy in-person or in the post that you specifically requested1 SKIP TO Q30a
- Receive a hard copy in-person or in the post that you didn't specifically request2 SKIP TO Q30a
- Read it on the Internet3 SKIP TO Q30a
- Read it after printing it out from the Internet4 SKIP TO Q30a
- None – didn't receive it or view online5 CONTINUE

Q29 Which of the following best describes why you haven't received it or read it online?

READ OUT - MULTICODE

- You didn't know how to get it1
- You were confident that the procedures you had in place were adequate2
- You thought the full guidance was too detailed for your business3
- Only been in the role for a short period4
- Other (specify)5
- Don't know / can't remember (DO NOT READ OUT)6

ASK Q30a IF RECEIVED A COPY OF FULL GUIDANCE (CODES 1-4 AT Q28), OTHERS SKIP TO SECTION 5

Q30a And which of the following best describes how much of the guidance you read?

READ OUT AND SINGLE CODE

- You read all of it1 SKIP TO Q31
- You read some of it2 SKIP TO Q31
- You only skimmed through it3 SKIP TO Q31
- You didn't read it at all4 CONTINUE
- Don't know / can't remember (DO NOT READ OUT)5 SKIP TO SECTION 5

Q30b Why didn't you read it at all? **WRITE IN**

ASK Q31 IF READ BOOKLET (CODES 1-3 AT Q30a) OR UNAWARE AND RECEIVED GUIDANCE BY EMAIL/POST, OTHERS SKIP TO SECTION 5

Q31 How useful did you find the full guidance? Would you say it was...

READ OUT AND SINGLE CODE

- Very useful1 CONTINUE
- Fairly useful2 CONTINUE
- Not very useful3 CONTINUE
- Not at all useful4 CONTINUE
- Don't know / can't remember (DO NOT READ OUT)5 SKIP TO Q32b

Q32a Why do you say that? **WRITE IN**

GUIDANCE AWARE

Q32bi What changes, if any, did you make to the way you manage food allergens in non pre-packed foods as a result of reading the guidance? **WRITE IN**

GUIDANCE UNAWARE (SENT GUIDANCE)

Q32bii What changes, if any, do you think you might make to the way you manage food allergens in non pre-packed foods as a result of reading the guidance? **WRITE IN**

Q32ci And what changes, if any, did you make to the way you notify customers about food allergens in non pre-packed foods as a result of reading guidance? **WRITE IN**

Q32cii And what changes, if any, might you make to the way you notify customers about food allergens in non pre-packed foods as a result of reading the guidance? **WRITE IN**

Q32d – 34 FOR GUIDANCE AWARE ONLY

IF NO CHANGES MADE AT Q32b-c, ASK Q32d

Q32d And did you do anything else as a result of reading the full guidance? E.g. check your current processes were okay, pass onto a colleague etc **WRITE IN**

Q33. Are you planning to make any changes in the future as a result of reading the full guidance?
SINGLE CODE

- | | | |
|------------------|----|-------------|
| Yes | .1 | CONTINUE |
| No | .2 | SKIP TO Q35 |
| Don't know | .3 | SKIP TO Q35 |

Q34. What changes are you planning to make? **WRITE IN**

ASK Q35-Q36e IF READ BOOKLET (CODES 1-3 AT Q30a) OR UNAWARE AND RECEIVED GUIDANCE BY EMAIL/POST

Q35. I'd now like you to rate some different attributes of the full guidance as very good, good, adequate, poor or very poor. So firstly, how would you rate the full guidance for: (READ OUT FIRST ATTRIBUTE)? **REPEAT FOR ALL ATTRIBUTES – ROTATE ORDER**

	Very Poor	Poor	Adequate	Good	Very good
Being easy to read / well laid out	1	2	3	4	5
Being comprehensive	1	2	3	4	5
Being aimed at businesses like yours	1	2	3	4	5
Providing tools or suggestions that you are able to implement within the business	1	2	3	4	5
Being easy to navigate and find the sections relevant to you	1	2	3	4	5
Easy to apply to our business procedures	1	2	3	4	5
Offering practical solutions	1	2	3	4	5
Being a good reference point should I have any issues in the future	1	2	3	4	5
Being as concise as possible.....	1	2	3	4	5
Providing specific examples for different types of businesses	1	2	3	4	5

Q36a What, if anything, did you like about the full guidance? Which sections did you find helpful?
WRITE IN

Q36b And what, if anything, didn't you like about the full guidance? Which sections did you not find helpful? **WRITE IN**

Q36c In order for the FSA to provide you with all the relevant information you need, what improvements or changes would you suggest they make to the full guidance? **WRITE IN**

Q36d Do you think if it became a legal requirement to provide customers with information about allergens, that the information contained in the full guidance would provide you with all the information you needed to make the necessary changes? **SINGLE CODE**

- | | | |
|------------------|---|--------------|
| Yes | 1 | SKIP TO Q37a |
| No | 2 | CONTINUE |
| Don't know | 3 | SKIP TO Q37a |

Q36e What changes or further information would be needed to the guidance? **WRITE IN**

SECTION 5 – POSTER

ASK QUESTIONS IN SECTION 5 IF AWARE OF POSTER AT S4a (CODE 3). THOSE UNAWARE OF POSTER BUT SENT GUIDANCE/LEAFLET/POSTER, SKIP TO Q39aii

Q37a You mentioned at the beginning of the interview that you were aware of the poster. Have you actually used the poster at all?

- | | | |
|---|---|----------------|
| Yes | 1 | SKIP TO Q38 |
| No | 2 | CONTINUE |
| Don't know / can't remember (DO NOT READ OUT) | 3 | SKIP TO SECT 6 |

Q37b Why haven't you used it? **WRITE IN**

ASK Q38-Q41b IF USING POSTER (CODE 1 AT Q37a) – OTHERS SKIP TO SECTION 6

Q38 How have you used the poster? **WRITE IN** Probe: Where have you put it?
What is it intended for?

POSTER AWARE

Q39ai And how useful have you found the poster? Would you say it is...**READ OUT AND SINGLE CODE**

- | | | |
|---|---|-------------|
| Very useful | 1 | CONTINUE |
| Fairly useful | 2 | CONTINUE |
| Not very useful | 3 | CONTINUE |
| Not at all useful | 4 | CONTINUE |
| Don't know / can't remember (DO NOT READ OUT) | 5 | SKIP TO Q40 |

POSTER UNAWARE (SENT POSTER)

Q39aⁱⁱ How useful do you think this poster would be? Would you say it would be...**READ OUT AND SINGLE CODE**

- | | | |
|---|---|-------------|
| Very useful | 1 | CONTINUE |
| Fairly useful | 2 | CONTINUE |
| Not very useful | 3 | CONTINUE |
| Not at all useful | 4 | CONTINUE |
| Don't know / can't remember (DO NOT READ OUT) | 5 | SKIP TO Q40 |

Q39b Why do you say that? **WRITE IN**

Q40. I'd now like you to rate different attributes of the poster as very good, good, adequate, poor or very poor. So firstly, how would you rate the poster for being: (READ OUT FIRST ATTRIBUTE)? **REPEAT FOR ALL ATTRIBUTES – ROTATE ORDER**

- | | Very Poor | Poor | Adequate | Good | Very good |
|---|-----------|------|----------|------|-----------|
| Easy to read / well laid out | 1 | 2 | 3 | 4 | 5 |
| A good starting point to the whole issue of managing food allergens in non pre-packed foods | 1 | 2 | 3 | 4 | 5 |
| A useful reminder for other people who work at your premises | 1 | 2 | 3 | 4 | 5 |

Q41a Do you have anyone working with non pre-packed foods at your business who finds it difficult to read English? **SINGLE CODE**

- | | | |
|---------------------------------------|---|----------------|
| Yes | 1 | CONTINUE |
| No | 2 | SKIP TO SECT 6 |
| Don't know / can't remember | 3 | SKIP TO SECT 6 |

Q41b. Using the same scale as previously i.e. very good, good, adequate, poor or very poor, how would you rate the poster for being... (READ OUT ATTRIBUTE BELOW)?

- | | Very Poor | Poor | Adequate | Good | Very good |
|--|-----------|------|----------|------|-----------|
| A useful visual guide for people who work at your premises who find it difficult to read English | 1 | 2 | 3 | 4 | 5 |

SECTION 6 – OTHER ISSUES

ASK ALL

ASK Q42a IF UNAWARE OF GUIDANCE BUT SENT GUIDANCE/LEAFLET/POSTER

Q42a The Food Standards Agency is keen to make as many businesses as possible aware of its voluntary Best Practice Guidance on the Provision of Allergen Information for Non Pre-Packed Foods. How would you suggest they make you aware of issues like this? **WRITE IN**

Q42b And which of the following ways of making you aware, do you think are appropriate for you and your business? **READ OUT - MULTICODE**

- Via your local authority / environmental health officer /
Trading standards officer1
- Direct from the Food Standards Agency by post2
- Direct from the Food Standards Agency by email3
- Through your trade association4
- None of the above (DO NOT READ OUT)5

Q42c Finally, would you be willing to take part in a follow-up telephone interview if we wanted to re-contact you and ask you a few more questions in a bit more depth? **SINGLE CODE**

- Yes1
- No2

Jigsaw Research, 13-14 Margaret Street, London, W1W 8RN
100094
– FOOD STANDARDS AGENCY –
NON-PRE-PACKED FOOD ALLERGENS RESEARCH QUESTIONNAIRE
FOOD ENFORCERS

Interviewer Name: _____ I.D. No. _____

Respondent Name: _____

Business Name and Address: _____

Postcode: _____ Telephone No: _____

INTERVIEWER DECLARATION

I declare that this interview has been conducted strictly in accordance with your specifications within the MRS Code of Conduct and with a person totally unknown to me.

Signed (INTERVIEWER): _____ Date _____

INTRODUCTION

Good morning/afternoon. My name is _____, from a company called Critical Research. We are conducting a survey on behalf of the Food Standards Agency among environmental health officers and trading standards officers who have some responsibility for advising local businesses about handling food safety and, in particular, food allergens in non pre-packed foods..

(Once through) We're conducting research on behalf of the Food Standards Agency. Can I just double-check that you have some responsibility for advising local caterers and/or retailers about handling allergens in non pre-packed foods i.e. do any of the businesses that you cover fall into that category?

IF NOT – ASK TO SPEAK TO SOMEONE WHO DOES

Your answers will be treated in confidence and not reported back in a way that identifies you by name. Your answers will be put together with those from many other local authorities to give an overall picture.

SECTION 1 – RESPONDENT/LA PROFILE

Say: Before I ask you questions about how you handle issues related to food allergies and labelling, I'd like to ask you a few questions about your role within (READ OUT NAME OF LOCAL AUTHORITY).

Q1 What is your job title? **SINGLE CODE**

Environmental Health Officer	1
Trading Standards Officer	2
Principal Environmental Health Officer	3
Food Officer / Food Safety Officer / Food Safety Standards Officer	4
Team Leader for Food & Health	5
Team Leader for Trading Standards	6
Other (specify)	3

Q3b Thinking about the caterers and retailers in your area that you personally advise about handling food allergens in non pre-packed food, approximately how many of the following types of business do you deal with on this issue? **CODE NUMBER BELOW**

Micro businesses i.e. 20 or fewer employees	[]
Small businesses i.e. 20-49 employees	[]
Medium businesses i.e. 50-249 employees	[]
Large businesses i.e. 250 or more employees	[]
Don't know (DO NOT READ OUT)	[]

Q5 LOCATION OF LOCAL AUTHORITY- **SINGLE CODE – DON'T NEED TO ASK – CODE FROM SAMPLE**

North East	1
North West	2
East Midlands	3
West Midlands	4
East of England	5
South East (excluding Greater London)	6
Greater London	7
South West	8
Yorks/Humber	9
Scotland	10
Wales	11
Northern Ireland	12

SECTION 2 – INFORMATION SOURCES

Q6 How knowledgeable and up-to-date do you think you are on the whole issue of food allergens for non pre-packed food? Would you say you are...**READ OUT - SINGLE CODE**

Q7 And how knowledgeable and up-to-date do you think the caterers and/or retailers that you monitor are on their handling of food allergens for non pre-packed food? Would you say they are...**READ OUT - SINGLE CODE**

	Q6	Q7
Very knowledgeable and up-to-date	1	1
Fairly knowledgeable and up-to-date	2	2
Not very knowledgeable and up-to-date	3	3
Not at all knowledgeable and up-to-date	4	4
Varies by/depends on business (DO NOT READ OUT)	5	

Q9 When thinking about organisations providing information, advice or training about allergens in non pre-packed foods, which ones come to mind? **DO NOT READ OUT - MULTICODE**

Q10 And which of the following organisations have you ever used for information, advice or training about allergens in non pre-packed foods, which ones come to mind? **READ OUT - MULTICODE – ROTATE ORDER**

Q11 And which would you say has been most useful in providing information about allergens in non pre-packed foods, which ones come to mind? **READ OUT - SINGLE CODE – ROTATE ORDER**

	Q9	Q10	Q11
The Food Standards Agency	1	1	1
Leatherhead Food International	4	4	4
Campden and Chorleywood Food Research Association (CCFRA)	5	5	5
Hygiene Audit Systems	6	6	6
The Chartered Institute for Environmental Health (CIEH)	7	7	7
The Royal Institute for Public Health	8	8	8
Reading Scientific Services	9	9	9
Trading Standards Institute (TSI)	10	10	10
The Anaphylaxis Campaign	12	12	12
Colleges / Universities	13	13	13
ABC Food Safety	14	14	14
Food and Drink Federation (FDF)	15	15	15
None	16	16	16
Don't know	17	17	17
Other (specify)	18	18	18

SECTION 3 – THE GUIDANCE

Q13 In 2008, the Food Standards Agency published voluntary Best Practice Guidance on the Provision of Allergen Information for Non Pre-Packed Foods. This guidance provides voluntary best practice advice to help food retailers and caterers selling food that is not pre-packed, provide allergen information on the food they sell. This full guidance was also accompanied by a leaflet and a poster. If you go to the following webpage: www.critical.co.uk/guidance you will be able to see what the full guidance and its contents page look like, as well as the leaflet and the poster.

IF UNABLE TO ACCESS LINK SAY: The full guidance is a 50 page A4 booklet with an orange and white front. The leaflet is much smaller and has a drawing of foods like French bread, sandwiches, cheese etc on a counter next to a till. The poster is called ‘Think Allergy’ and has a cartoon story of a customer asking a staff member in a shop about whether a sandwich contains any egg in it.

Are you aware of any of these documents? **MULTI CODE**

Yes, aware of full guidance1	ELIGIBLE – SKIP TO Q15a
Yes, aware of leaflet2	ELIGIBLE – SKIP TO Q15a
Yes, aware of poster3	ELIGIBLE – SKIP TO Q15a
No, not aware of any4	CONTINUE
Don’t know / can’t remember5	CONTINUE

ASK Q14 IF UNAWARE OF GUIDANCE (CODES 4-5 AT Q13)

Q14 How useful do you think it would have been to have received these documents over the last 2 years? Do you think it would have been...**SINGLE CODE – IF NECESSARY RE-READ DESCRIPTION OF GUIDANCE FROM S4**

Very useful1	SKIP TO SECT 4
Fairly useful2	SKIP TO SECT 4
Not very useful3	SKIP TO SECT 4
Not at all useful4	SKIP TO SECT 4
Don’t know (DO NOT READ OUT)5	SKIP TO SECT 4

ASK Q15a AS APPROPRIATE FROM Q13

Q15a Do you have or have you had original hard copies of these documents? **MULTI CODE**

- Yes, have hard copy/copies of full guidance1
- Yes, have hard copy/copies of leaflet2
- Yes, have hard copy/copies of poster3
- No, don't have hard copies of any4
- Don't know / can't remember5

ASK Q15b AS APPROPRIATE FROM Q13

Q15b Have you ever viewed these documents online or printed them out from the Internet?

MULTI CODE

- Yes, full guidance1
- Yes, leaflet2
- Yes, poster3
- No, have not viewed any4
- Don't know / can't remember5

ASK Q16 IF EVER HAD COPY OF LEAFLET (CODE 2 AT Q15a AND/OR Q15b), OTHERS SKIP TO Q22

Q16 Which of the following have you done with the leaflet? **READ OUT AND MULTICODE**

- Used to help develop your own knowledge/approach to the issue of food allergens in non pre-packed food1
- Handed copies out to relevant businesses in your area2
- Used it as a guide whilst discussing the issue with a business ..3
- Used it at training / seminars for businesses4
- Told relevant businesses in your area where to find the leaflet over the Internet5
- Other (please specify)6
- None (DO NOT READ OUT)7
- Don't know / can't remember (DO NOT READ OUT)8

Q17 Which of the following types of caterers and retailers selling non-pre packed food do you think this leaflet is most appropriate for? **READ OUT AND MULTICODE BELOW**

- All businesses1
- Large businesses2
- Small businesses3
- New businesses4
- Businesses with staff with a poor grasp of English5
- Other (specify)6
- Don't know7

Q18 And how useful do you personally find this leaflet? Would you say it is...**READ OUT AND SINGLE CODE**

- Very useful1
- Fairly useful2
- Not very useful3
- Not at all useful4

Q19 Why do you say that? **WRITE IN**

Q20 And how useful do you think this leaflet is for caterers and retailers? Would you say it is...**READ OUT AND SINGLE CODE**

- Very useful1
- Fairly useful2
- Not very useful3
- Not at all useful4

Q21 Why do you say that? **WRITE IN**

ASK Q22 IF EVER HAD COPY OF FULL GUIDANCE (CODES 1 AT Q13), OTHERS SKIP TO Q37

Q22 When did you first become aware of the full guidance? Was it...**READ OUT AND SINGLE CODE**

- In the last 3 months1
- 4-6 months ago2
- 7-12 months ago3
- 1-1 ½ years ago4
- 1 ½ to 2 years ago5
- Don't know / can't remember (DO NOT READ OUT)6

Q23 And how did you become aware of it? **DO NOT READ OUT BUT PROMPT IF NECESSARY - POSSIBLE MULTICODE**

- Found on FSA website1
- Via the FSA allergens labelling leaflet2
- Told/Given at training session3
- Told/Given by work colleague4
- Sent by the FSA5
- Other (specify)6
- Don't know / can't remember (DO NOT READ OUT)7

ASK Q24a IF EVER HAD COPY OF GUIDANCE (CODE 1 AT Q15a AND/OR Q15b) - OTHERS SKIP TO Q38

Q24a And which of the following best describes how much of the guidance you have read? **READ OUT AND SINGLE CODE**

- Read all of it1 SKIP TO Q25
- Read some of it2 SKIP TO Q25
- Only skimmed through it3 CONTINUE
- Didn't read it at all4 CONTINUE
- Don't know / can't remember (DO NOT READ OUT)5 SKIP TO Q25

Q24b Why haven't you read it at all / have you only skim read it? **WRITE IN**

Q25 Which of the following have you ever done with the guidance? **READ OUT AND MULTICODE**

- Used it to help formulate your own knowledge/approach to the issue of allergens in non pre-packed foods1
- Handed hard copies out to relevant businesses in your area ...2
- Told relevant businesses in your area where to find the guidance over the Internet3
- Used it at training / seminars for businesses4
- Showed specific pages/sections when talking to relevant businesses5
- Other (please specify)6
- None (DO NOT READ OUT)7
- Don't know / can't remember (DO NOT READ OUT)8

Q26 Which of the following types of caterers and retailers selling non-pre packed food do you think this guidance is most appropriate for? **READ OUT AND MULTI CODE – ROTATE ORDER**

- All businesses1
- Large businesses2
- Small businesses3
- New businesses4
- Other (specify)5
- Don't know6

ASK Q27 IF READ GUIDANCE AT Q24a (CODES 1-3). OTHERS SKIP TO Q37a

Q27 And how useful did you personally find the full guidance? Would you say it was...**READ OUT AND SINGLE CODE**

- Very useful1
- Fairly useful2
- Not very useful3
- Not at all useful4

Q28 Why do you say that? **WRITE IN**

Q29 And how useful do you think this guidance is for caterers and retailers? Would you say it is...**READ OUT AND SINGLE CODE**

- Very useful1
- Fairly useful2
- Not very useful3
- Not at all useful4

Q30 Why do you say that? **WRITE IN**

Q31 What changes, if any, did you make to the way you provide advice on the issue of food allergens in non pre-packed foods as a result of reading the guidance? **WRITE IN**

Q33. Are you planning to make any changes in the future to the way you provide advice on the issue of food allergens in non pre-packed foods as a result of reading the full guidance?
SINGLE CODE

- Yes1 CONTINUE
- No2 SKIP TO Q35
- Don't know3 SKIP TO Q35

Q34. What changes are you planning to make? **WRITE IN**

Q35. I'd now like you to rate some different attributes of the full guidance as very good, good, adequate, poor or very poor. So firstly, how would you rate the full guidance for: (READ OUT FIRST ATTRIBUTE)? **REPEAT FOR ALL ATTRIBUTES – ROTATE ORDER**

	Very Poor	Poor	Adequate	Good	Very good
Being easy to read / well laid out	1	2	3	4	5
Being comprehensive	1	2	3	4	5
Providing tools or suggestions that you were able to build into the advice you provide to businesses in your area	1	2	3	4	5
Providing tools or suggestions that businesses in your area were able to implement	1	2	3	4	5
Being easy to navigate and find the sections relevant to you	1	2	3	4	5
Easy for businesses to apply to their business procedures	1	2	3	4	5
Offering practical solutions	1	2	3	4	5
Providing full authoritative guidance on food allergens in non pre-packed foods	1	2	3	4	5
Providing specific examples for different types of businesses	1	2	3	4	5

Q36a What, if anything, did you like about the full guidance? Which sections did you find helpful?

WRITE IN

Q36b And what, if anything, didn't you like about the full guidance? Which sections did you not find helpful? **WRITE IN**

Q36d And how do you think the FSA could improve awareness and dissemination of the guidance among...

- a) People like yourself in Local Authorities? **WRITE IN**
- b) Among the businesses it's aimed at? **WRITE IN**

Q36e Do you think if it became a legal requirement for businesses selling non pre-packed foods to provide customers with information about food allergens , that the information contained in the full guidance would provide you and those businesses with all the information they needed to make the necessary changes? **SINGLE CODE**

- Yes1 SKIP TO Q37a
- No2 CONTINUE
- Don't know3 SKIP TO Q37a

Q36f What changes or further information would be needed to the guidance? **WRITE IN**

Q37a Over the last 2 years or so, have you received any...**READ OUT AND MULTI CODE**

- Any direct training or advice about allergens in non pre-packed food by attending an external training course1 CONTINUE
- Any direct training or advice about allergens in non pre-packed food by attending an internal training course2 SKIP TO Q38
- Feedback from colleagues who have attended courses about allergens in non pre-packed food3 SKIP TO Q38
- None (DO NOT READ OUT)4 SKIP TO Q38
- Don't know/can't remember (DO NOT READ OUT)5 SKIP TO Q38

Q37b Who has provided this training? **DO NOT READ OUT AND MULTICODE**

A specialist training provider	2
The Food Standards Agency	3
Hygiene Audit Systems	4
The Chartered Institute for Environmental Health (CIEH)	5
Trading Standards Institute (TSI)	6
The Royal Institute for Public Health	7
Other (specify)	8
Don't know/can't remember	9

ASK Q38 IF EVER HAD COPY OF POSTER (CODE 3 AT Q15a AND/OR Q15b), OTHERS SKIP TO SECTION 4

Q38 Which of the following have you done with the poster? **READ OUT AND MULTICODE**

Handed copies out to relevant businesses in your area	2
Used it as a guide whilst discussing the issue with a business	3
Used it at training / seminars for businesses	4
Told relevant businesses in your area where to find the poster over the Internet	5
Other (please specify)	6
None (DO NOT READ OUT)	7
Don't know / can't remember (DO NOT READ OUT)	8

Q39 Which of the following types of caterers and retailers selling non-pre packed food do you think this poster is most appropriate for? **READ OUT AND MULTICODE BELOW**

All businesses	1
Large businesses	2
Small businesses	3
New businesses	4
Businesses with staff with a poor grasp of English	5
Other (specify)	6
Don't know	7

Q40a And how useful do you think this poster is for caterers and retailers? Would you say it is...**READ OUT AND SINGLE CODE**

Very useful	1
Fairly useful	2
Not very useful	3
Not at all useful	4

Q40b Why do you say that? **WRITE IN**

Q41 And do you think this poster is more or less useful for caterers and retailers who employ staff who do not have English as their first language? Would you say it is...**READ OUT AND SINGLE CODE**

- More useful for these types of businesses1
- Less useful for these types of businesses2
- Or is there no difference3
- Don't know (DO NOT READ OUT)4

SECTION 4 – OTHER ISSUES

ASK ALL

Q42. And finally, would you be willing to take part in a follow-up telephone interview if we wanted to re-contact you and ask you a few more questions in a bit more depth? **SINGLE CODE**

Yes1
No2

Appendix 3 – Discussion Guides

Allergens Guidance Research Caterers and Retailers Discussion Guide

RECRUITMENT QUESTIONS:

- *Can I please speak to the person fully or partly responsible for the business's handling of food safety and food allergens within the business*
- *(When through) Can I just double-check that you are fully or at least partly responsible for the business's handling of food allergens within the business?*

1. Introduction (2 minutes)

- *MAKE SURE HAVE ALL BUSINESS DETAILS TO HAND BEFORE INTERVIEW*
- *Explain purpose of research – to talk about how you approach handling food allergens within your business*
- *Asking opinion, so no right/wrong answers.*
- *Explain reason for audio taping*
- *Explain Market Research code of conduct – confidentiality / anonymity /no further communication as a result of interview*
- *Explain interview will take approximately 30-40 minutes*

2. Business Background (4 minutes)

- *Before we start talking about Food Allergens can you please tell me a little bit about yourself and the business you work for, probe for:*
 - o *Type of business*
 - o *What type of food is sold/offered?*
 - o *How large is the company i.e. how many people do they employ?*
 - o *Respondent job title, role and how long worked there*
 - o *Number of locations where food is prepared? What food is prepared at each location?*
 - o *Level of responsibility for implementation of allergens management within business*
 - *Who else is involved?*

3. Company Approach to Food Allergen Management – Providing Information about Allergens and Controlling Cross-contamination (7 minutes)

- *What food allergens, if any, do you handle on your premises?*
 - o *If necessary probe for: peanuts, nuts, eggs, milk, shellfish (crustaceans, molluscs), fish, sesame seeds, cereals containing gluten, Soya, lupin, celery, mustard, sulphur dioxide/sulphites*

- *What is your general approach to food allergen management when preparing non pre-packed food, particularly in terms of risk assessment, controlling allergen cross-contamination and making it clear what foods contain certain allergens?*
 - o *Has your approach to this changed over the last few years?*
 - o *In what way?*
 - o *What has prompted this change?*
- *And what is your general approach to food allergen management for companies that supply your business with food products, particularly in terms of risk assessment and controlling allergen cross-contamination?*
 - o *Has your approach to this changed over the last few years?*
 - o *In what way?*
 - o *What has prompted this change?*
- *What systems or procedures if any does your business have in place with regards to notifying customers about allergens in certain foods?*
- *What systems or procedures does your business have in place with regard to allergens and cross-contamination?*
- *Does your company have any specific issues that make food allergen management complicated? For example, handling different food types at different times of the day?*
 - o *How have you tackled this issue?*
- *Have you ever received advice on food allergen management?*
 - o *Who have you received advice from? Probe for: local colleges, local authority (EHO/TSO), Food Standards Agency, trade body/association, suppliers/clients, other members of staff/internal training sessions*
 - o *How useful was this advice?*
- *How often do you get customers querying whether the foods you prepare contain any food allergens?*

4. Awareness and Receipt of Guidance (10 minutes)

- *ALL RESPONDENTS WITH ACCESS TO PC TO BE EMAILED LINK TO PDF OF FULL GUIDANCE, LEAFLET AND POSTER BEFORE INTERVIEW (IF DON'T HAVE COPY). IF RESPONDENTS DON'T HAVE ACCESS TO THE INTERNET, THEN WE WILL MAIL PRINT OUTS TO RESPONDENTS*
- *Read out: The Food Standards Agency published voluntary best practise Guidance on the provision of Allergen Information for Non Pre-Packed Foods in 2008. It provides advice on controlling food allergens in food businesses where the food has not been pre-packed, e.g. take-aways, restaurants, bakeries, deli counters, sandwich bars etc. The Food Standards Agency also produced a leaflet for smaller businesses that contained similar information but in less detail. They also produced a poster called Think Allergy which shows a customer asking for information about allergens.*
- *Before we contacted you originally, had you heard of this guidance, leaflet or poster?*
- *Do you have a hard copy of the guidance/leaflet or did you download it from the Food Standards Agency's website?*

- *How did you become aware of it? Probe for: local authority TSOs/EHOs, retailers, trade bodies/associations, trade magazines, media, training workshops*
- *When you were told about it, did you need to try and find the guidance yourself?*
 - o *How easy was it to find it?*
 - o *Where did you find it?*
 - o *Did you expect to find it here?*
- *And when did you first receive/download the guidance?*
- *(If have hard copy) Did you request this guidance/leaflet or did it arrive automatically or did your enforcement officer give it to you?*
- *How would you expect to receive a document like this?*
 - o *Through which channel/s?*
- *And how would you prefer to receive a document like this?*
 - o *Through which channel/s?*

5. Usage and Opinion of Guidance/Leaflet/Poster (10 minutes)

ASK QUESTIONS BELOW FOR FULL GUIDANCE AND/OR LEAFLET

- *What have you done with the guidance/leaflet since receiving/downloading it?*
 - o *How much of the guidance/leaflet have you read?*
 - o *Which sections of the guidance/leaflet, if any, have you read?*
 - o *If relevant: Is the poster displayed at all?*
- *Did you read the guidance/leaflet in full or have you just referenced the sections you need information on?*
- *Who else within the organisation has read the guidance/leaflet?*
- *What are your overall impressions of the guidance/leaflet?*
 - o *What do you like about it?*
 - o *What do you dislike about it?*
 - o *How do you rate the guidance/leaflet in terms of being:*
 - *Clear and concise*
 - *Useful*
 - *Well laid out*
 - o *Do you see the guidance/leaflet as something that is useful or an extra burden (or somewhere in between)?*
 - o *How could the guidance/leaflet be improved? Is there anything missing?*
- *Do you think the guidance/leaflet provides full authoritative guidance on the issue of food allergen information?*
 - o *Why/why not?*
- *And to what extent have you incorporated the ideas and suggestions outlined in this guidance/leaflet across the organisation?*
 - o *Why / why not?*
 - o *If implemented:*
 - *What ideas and suggestions have you used?*
 - *How helpful was the guidance/leaflet in helping you incorporate these ideas? Why do you say that?*

- *Did you use any other documents or advice?*
 - *Which ones?*
- *Have you encountered any barriers using the guidance/leaflet and implementing the suggestions contained in it?*
 - *What barriers have you encountered?*
 - *Comparative usefulness of the leaflet vs full guidance*
- *Have you made any changes as a result of the guidance/leaflet to: (a) internal procedures, and (b) your dealings with your customers*
 - o *staff training/raising awareness?*
 - o *The way you carry out risk assessments for your Critical Control Points?*
 - o *Your procedures e.g. cleaning procedures, scheduling, introduction of new ingredients, the way you prepare food*
 - *Can you give me some examples of how your procedures have changed?*
 - o *Dealing with customers?*
 - *Can you give me some examples of how the way you notify customers of allergens has changed?*
- *And are you planning to implement any of the ideas and suggestions from the guidance/leaflet into the organisation in the future?*
 - o *Why / why not?*
 - o *If planning to implement:*
 - *What ideas and suggestions are you planning to use?*
 - *How helpful do you think the guidance/leaflet will be in helping you incorporate these ideas? Why do you say that?*
 - *Will you use any other documents or advice?*
 - *Do you think you are likely to encounter any barriers using the guidance/leaflet or implementing the suggestions contained in it?*
 - *What barriers do you think you are likely to encounter?*
- *What benefits do you think exist for the organisation if it acts upon this guidance/leaflet?*
- *What other support do you feel you need to help you with this issue?*
 - o *What format would you like this in? e.g. hard copy guides, web-based, training sessions, conferences etc*
- *How have you used the **poster**?*
 - o *How many of these do you have?*
 - o *Where is it?*
 - o *How many people can see it?*
 - o *What do you hope to achieve by having this poster?*
 - o *Do you have anyone working there who finds it difficult to read English?*
 - *If so, does this poster overcome this issue i.e. do the visuals make it clear what the message is?*
 - o *How could the poster be improved?*
- *What do you think about the Food Standard's Agency guidance being voluntary "best practice" rather than compulsory legislation?*

- o *Why do you say that?*
- *If it became a legal requirement rather than just best practise to provide allergen information to customers, do you think you would need to make further changes?*
 - o *If yes, do you think the guidance provides you with all the information you need to do this or do you think you need more information?*
 - *What's missing / what else is needed?*
- *Should this become a legal requirement, do you think you would need to make additional changes and what financial implications would this have for you?*

6. And finally... (2 minutes)

- How do you feel about the messages/advice you get from Government with regards to food allergens?
 - Does it feel joined up?*
 - If not, can you give me examples of where it doesn't feel joined up i.e. duplication, contradictions etc.*
- What advice or key issues would you highlight/identify to other organisations intending on using the guidance?
- Are there any issues related to allergen management we haven't discussed that you think are important to mention to the Food Standards Agency?
- And thinking of all the issues we've discussed what do the Food Standards Agency need to do to make it easier for you to implement allergen management procedures across your organisation?

THANK AND CLOSE

Allergens Guidance Research
Enforcement Officers
Discussion Guide

RECRUITMENT QUESTIONS:

- *Once through to local authority, explain purpose of research and ask to speak to a Environmental Health Officer or Trading Standards Officer who has responsibility for checking how local caterers and retailers handle food allergens in non pre-packed foods*
- *(Once through) We're conducting research on behalf of the Food Standards Agency. Can I just double-check that you have some responsibility for checking how local caterers and/or retailers handle food allergens in loose foods*

BACKGROUND FOR INTERVIEWERS: Enforcement Officers will be responsible for all businesses in their area, not just the food ones. They will visit them every couple of years unless there is a problem or a complaint and then they will visit more frequently. When discussing food allergens with the business they usually take an advisory role and try to encourage good practice. With non pre-packed foods there is not a legal requirement to inform the end customer about food allergens. Enforcement officers will try to impress on the business the importance of having good allergen control and encourage them to be open and honest with their customers. Therefore, their role will be more advisory than monitoring.

1. Introduction (2 minutes)

- *MAKE SURE HAVE ALL DETAILS TO HAND BEFORE INTERVIEW*
- *Explain purpose of research –to talk about how you advise about and monitor food allergens in loose foods within caterers and/or retailers in your area*
- *Asking opinion, so no right/wrong answers.*
- *Explain reason for audio taping*
- *Explain Market Research code of conduct – confidentiality / anonymity /no further communication as a result of interview*
- *Explain interview will take approximately 30-40 minutes*

2. Respondent Background (4 minutes)

- *Before we start talking about monitoring businesses, can you please tell me a little bit about yourself and your role, probe for:*
 - o *Respondent job title, role and how long worked at Local Authority*
 - o *How many other TSO/EHO work for this organisation?*
- *How many are involved in monitoring how businesses handle food allergens in non pre-packed?*
 - o *Level of responsibility for monitoring food allergens management within businesses in your area*

- *How long have you had this remit?*
 - o *What training, if any, have you received in the area of food allergens in the last few years?*
- *Probe for: Food Standards Agency, 3rd party training body, by someone else within the local authority, online allergy training website (via FSA website)*
 - o *And what other information or advice have you received in that time to help you in this area?*
- *Written guides, online support etc.*

3. Local Authority Approach to Monitoring Food Allergen Management – Helping Businesses Provide Information about Allergens and Control Cross-contamination (7 minutes)

- *What is your general approach to monitoring businesses in your area for food allergens, particularly in terms of notifying customers, risk assessment and allergen cross-contamination?*
 - o *Has your approach to this changed over the last few years?*
 - o *In what way?*
 - o *What has prompted this change?*
- *Approximately how many businesses in your area require monitoring or advice for food allergen management in loose foods?*
 - o *How many of these do you personally monitor?*
 - o *How does that breakdown between:*
- *Caterers and retailers*
- *Large, medium and small businesses*
- *How do you monitor allergens and cross-contamination in those businesses?*
- *And how do you monitor how they provide information to customers about allergens?*
- *Do you have to monitor any businesses which have any specific issues that make food allergen management complicated? For example, a business that has a number of different allergens?*
 - o *How have you tackled this issue?*

4. Awareness and Receipt of Guidance (10 minutes)

- *ALL RESPONDENTS TO BE EMAILED LINK TO PDF OF FULL GUIDANCE, LEAFLET AND POSTER BEFORE INTERVIEW (IF DON'T HAVE COPY)*
- *Read out: The Food Standards Agency published voluntary best practise Guidance on the provision of Allergen Information for Non Pre-Packed Foods in 2008. It provides advice on controlling food allergens in food businesses where the food has not been pre-packed, e.g. take-aways, restaurants, bakeries, deli counters, sandwich bars etc. The Food Standards Agency also produced a leaflet for smaller businesses that contained similar information but in less detail. They also produced a poster called Think Allergy which shows a customer asking for information about allergens.*

- *Before we contacted you originally, had you heard of this guidance, leaflet or poster?*
- *Do you have a hard copy of the guidance/leaflet or did you download it from the Food Standards Agency's website?*
- *How did you become aware of it? Probe for: local authority, other TSOs/EHOs, retailers, trade bodies/associations, trade magazines, media, training workshops*
- *And when did you first receive/download the guidance?*
- *(If have hard copy) Did you request this guidance/leaflet or did it arrive automatically?*
- *Would you expect to have a copy of the guidance/leaflet for reference purposes?*
- *How would you expect to receive a document like this?*
 - o *Through which channel/s?*
- *And how would you prefer to receive a document like this?*
 - o *Through which channel/s?*
 - o *Is there a better way to disseminate this guidance?*

5. Usage and Opinion of Guidance (10 minutes)

- *Have you or your local authority tried to make businesses aware of this guidance since it's been published?*
- *Have you distributed any hard copies to businesses in your area?*
 - o *How have you done this? Probe for: post, at seminars/conferences, on site visits, sent weblink via email/letter?*
 - o *Check distribution of each format and whether focussing on any particular format in terms of distribution*
- *What else have you done with the guidance since receiving/downloading it?*
 - o *How much of the guidance/leaflet have you personally read?*
 - o *Which sections of the guidance/leaflet, if any, have you read?*
 - o *Have you used any of the information when sending information out to relevant businesses in the area?*
- *Have you personally read the guidance in full, skimmed it or have you just referenced the sections you need information on?*
- *Who else within the local authority has read the guidance?*
- *What are your overall impressions of the guidance/leaflet/poster?*
- **ASK FOR EACH:**
 - o *What do you like about it?*
 - o *What do you dislike about it?*
 - o *How do you rate the guidance in terms of being:*
 - *Clear and concise*
 - *Useful for you*
 - *Useful for businesses in the area*
 - *Well laid out*
 - o *Do you see the guidance as something that is useful or an extra burden for businesses (or somewhere in between)?*

- o *How could it be improved? Is there anything missing? Check each format and whether focussing on any particular format.*
- o *Reaction of businesses to the different formats in terms of perceived usefulness*
- *Do you think the guidance provides full authoritative guidance on the issue of food allergens in loose foods?*
 - o *Why/why not?*
- *And to what extent do you think businesses have incorporated the ideas and suggestions outlined in this guidance?*
 - o *Why / why not?*
 - o *If implemented:*
 - *What ideas and suggestions have they used?*
 - *How helpful was the guidance in helping them incorporate these ideas? Why do you say that?*
 - *Did they use any other documents or advice?*
 - *Which ones?*
 - *Do you know if they encountered any barriers using the guidance and implementing the suggestions contained in it?*
 - *What barriers did they encounter?*
- *And to what extent have you incorporated the ideas and suggestions outlined in this guidance in to your role and the way you advise businesses?*
 - o *Why / why not?*
 - o *If you refer to the guidance/leaflet/poster during your visit:*
 - *What ideas and suggestions have you used?*
 - *How helpful was it in helping you in your role? Why do you say that?*
 - *Do you use any other documents or advice?*
 - *Which ones?*
- *Have you made any changes to the way you operate and monitor businesses as a result of the guidance, particularly in the way businesses:*
 - o *Carry out risk assessments for their Critical Control Points?*
 - o *Their procedures e.g. cleaning procedures, scheduling, introduction of new ingredients*
 - o *Allergen Labelling and the way they notify customers?*
- *How do you explain this information to a business where English is poorly understood or read?*
 - o *Does the poster help convey this information?*
- *Do you provide training on handling allergens for food businesses in your area?*
 - o *Do you refer to this guidance?*
- *What benefits do you think exist for the organisations in your area if they act upon this guidance?*
- *What other support do you feel you need to help you with this issue?*
 - o *What format would you like this in? e.g. hard copy guides, web-based, training sessions, conferences etc*

- *What do you think about the Food Standard's Agency guidance being voluntary "best practice" rather than compulsory legislation?*
 - o *Why do you say that?*
- *If it became a legal requirement rather than just best practise for businesses to provide allergen information to customers, do you think you would need to change the way you help and advise businesses?*
 - o *If yes, do you think the guidance provides you with all the information you need to help businesses*
 - *What's missing / what else is needed?*
 - o *And do you think there is enough information for businesses themselves?*
 - *What's missing / what else is needed?*
 - o *Do you have the information you need to enforce this?*

6. And finally... (2 minutes)

- How do you feel about the messages/advice businesses get from central and local Government with regards to food allergens in loose foods?
 - Does it feel joined up?*
 - If not, can you give me examples of where it doesn't feel joined up i.e. duplication, contradictions etc*
- What advice or key issues would you highlight/identify to other TSOs/EHOs intending on using the guidance?
- Are there any issues related to allergen management we haven't discussed that you think are important to mention to the Food Standards Agency?
- And thinking of all the issues we've discussed what does the Food Standards Agency need to do to make it easier for businesses to manage allergens in loose foods and notify their customers?
- And what could they do to make your role easier?

THANK AND CLOSE

Allergens Guidance Research
Training Bodies/Catering Colleges
Discussion Guide

RECRUITMENT QUESTIONS:

- *Can I speak to someone responsible for training businesses in the area of food safety management. (In catering colleges, this may be the ‘training chef’)*
- *(Once through) We’re conducting research on behalf of the Food Standards Agency, and we’d like to talk to people who train businesses about food safety management. In particular we want to talk to people who cover the issue of food allergens in loose foods within businesses i.e. caterers and retailers. Is this something you ever cover in your training sessions?*

1. Introduction (2 minutes)

- *MAKE SURE HAVE ALL BUSINESS DETAILS TO HAND BEFORE INTERVIEW*
- *Explain purpose of research –to talk about how you train businesses about handling food allergens in loose foods*
- *Asking opinion, so no right/wrong answers.*
- *Explain reason for audio taping*
- *Explain Market Research code of conduct – confidentiality / anonymity /no further communication as a result of interview*
- *Explain interview will take approximately 30-40 minutes*

2. Business Background (4 minutes)

- *Before we start talking about training businesses, can you please tell me a little bit about yourself and your role, probe for:*
 - o *Respondent job title, role and how long worked at training body/college*
 - o *How many other trainers work for this organisation/college?*
 - *How many are involved in training businesses about food allergens in loose foods?*
 - o *What types of businesses do you train on this type of issue? Probe for: small/medium/large businesses, caterers and retailers*
 - *Do you mainly train businesses in one area or do you cover other regions?*
 - o *Do you train anybody else in this subject area such as local authorities?*
 - o *Have you ever had specific training in handling food allergens?*

3. Approach to Training about Allergens and Control Cross-contamination (7 minutes)

- *What is your general approach to training businesses about food allergen management, particularly in terms of notifying their customers, risk assessment and allergen cross-contamination?*
 - o *Has your approach to this changed over the last few years?*
 - o *In what way?*
 - o *What has prompted this change?*
- *What other areas do you cover in your training programme?*

- o *What proportion of training sessions relate specifically to food allergens in loose foods?*
- o *Has the proportion this accounts for increased, decreased or remained about the same over the last few years? Why do you say that?*
- *Do you have to train/help businesses which have any specific issues that make food allergen management complicated? For example, a business that handles a number of different allergens or high risk allergens?*
 - o *How have you tackled this issue?*

4. Awareness and Receipt of Guidance (10 minutes)

- *ALL RESPONDENTS TO BE EMAILED LINK TO PDF OF FULL GUIDANCE, LEAFLET AND POSTER BEFORE INTERVIEW (IF DON'T HAVE COPY)*
- *Read out: The Food Standards Agency published voluntary best practise Guidance on the provision of Allergen Information for Non Pre-Packed Foods in 2008. It provides advice on controlling food allergens in food businesses where the food has not been pre-packed, e.g. take-aways, restaurants, bakeries, deli counters, sandwich bars etc. The Food Standards Agency also produced a leaflet for smaller businesses that contained similar information but in less detail. They also produced a poster called Think Allergy which shows a customer asking for information about allergens.*
- *Before we contacted you originally, had you heard of this guidance, leaflet or poster?*
- *Do you have a hard copy of the guidance/leaflet or did you download it from the Food Standards Agency's website?*
- *How did you become aware of it? Probe for: via Food Standards Agency, TSOs/EHOs, professional bodies (CIEH, TSI etc), media, internal training/workshops*
- *And when did you first receive/download the guidance?*
- *(If have hard copy) Did you request this guidance/leaflet or did it arrive automatically?*
- *Would you expect to have a copy of the guidance/leaflet for reference purposes?*
- *How would you expect to receive a document like this?*
 - o *Through which channel/s?*
- *And how would you prefer to receive a document like this?*
 - o *Through which channel/s?*
 - o *Is there a better way to disseminate this guidance?*

5. Usage and Opinion of Guidance (10 minutes)

- *Have you or your organisation tried to make businesses aware of this guidance since it's been published?*
- *Have you distributed any hard copies to businesses that have been involved in your training?*
 - o *How have you done this? Probe for: post, at training sessions, sent weblink via email/letter?*
 - o *How does distribution of full guidance vs leaflet vs poster compare/differ?*
- *What else have you done with the guidance since receiving/downloading it?*
 - o *How much of the guidance/leaflet have you personally read?*

- o *Which sections of the guidance/leaflet, if any, have you read?*
- o *Have you used any of the information as part of your training programme?*
 - *Which sections have used most frequently? Why?*
 - *Which sections have you also used? Why?*
 - *Which sections haven't you used at all? Why?*
- *Did you read the guidance in full or have you just referenced the sections you need information on?*
- *Who else within your organisation has read the guidance?*
- *What are your overall impressions of the guidance/leaflet/poster?*
- **ASK FOR EACH:**
 - o *What do you like about it?*
 - o *What do you dislike about it?*
 - o *How do you rate the guidance in terms of being:*
 - *Clear and concise*
 - *Useful for you*
 - *Useful for businesses that you train*
 - *Well laid out*
 - o *Do you see the guidance as something that is useful or an extra burden for businesses (or somewhere in between)?*
 - o *How could the guidance/leaflet/poster be improved? Is there anything missing?*
 - o *Comparative usefulness of guidance vs leaflets for businesses*
- *Do you think the guidance provides full authoritative guidance on the issue of food allergens in loose foods?*
 - o *Why/why not?*
- *And to what extent do you think businesses have incorporated the ideas and suggestions outlined in this guidance?*
 - o *Why / why not?*
 - o *If implemented:*
- *What ideas and suggestions have they used?*
- *How helpful was the guidance in helping them incorporate these ideas? Why do you say that?*
- *Did they use any other documents or advice?*
- *Which ones?*
- *Do you know if they encountered any barriers using the guidance and implementing the suggestions contained in it?*
- *What barriers did they encounter?*
- *And to what extent have you incorporated the ideas and suggestions outlined in this guidance in to your role and the way you train businesses?*
 - o *Why / why not?*
 - o *If implemented:*
 - *What ideas and suggestions have you used?*
 - *How helpful was the guidance in helping you in your role? Why do you say that?*

- *Do you use any other documents or advice?*
 - *Which ones?*
- *Have you made any changes to the way you train and advise businesses as a result of the guidance, particularly in the way businesses:*
 - o *Carry out risk assessments for their Critical Control Points?*
 - o *Their procedures e.g. cleaning procedures, scheduling, introduction of new ingredients when developing recipes*
 - o *Allergen Labelling and the way they notify customers?*
- *Do you find that there is a problem with business where English is poorly understood or read?*
 - o *Does the poster help convey messages?*
- *What benefits do you think exist for the organisations in your area if they act upon this guidance?*
- *What other support do you feel you need to help you with this issue?*
 - o *What format would you like this in? e.g. hard copy guides, web-based, training sessions, conferences etc*
- *What do you think about the Food Standard's Agency guidance being voluntary "best practice" rather than compulsory legislation?*
 - o *Why do you say that?*
- *If it became a legal requirement rather than just best practise for businesses to provide allergen information to customers, do you think you would need to change the way you train businesses?*
 - o *If yes, do you think the guidance provides you with all the information you need to help businesses*
 - *What's missing / what else is needed?*
 - o *And do you think there is enough information for businesses themselves?*
 - *What's missing / what else is needed?*

6. And finally... (2 minutes)

- How do you feel about the messages/advice businesses get from Government with regards to food allergens in loose foods?
 - Does it feel joined up?*
 - If not, can you give me examples of where it doesn't feel joined up i.e. duplication, contradictions etc*
- What advice or key issues would you highlight/identify to other training bodies/colleges intending to use the guidance?
- Are there any issues related to allergen management we haven't discussed that you think are important to mention to the Food Standards Agency?
- And thinking of all the issues we've discussed what does the Food Standards Agency need to do to make it easier for businesses to manage allergens in loose foods and notify their customers?
- And what could they do to make your role easier?

THANK AND CLOSE

