

Appendix H: Enforcement officer topic guide

RSM UK Consulting LLP (RSM) has been commissioned by the FSA and FSS to undertake an independent evaluation of the current food traceability, withdrawals and recalls system following changes made between 2017 – 2019 to improve the effectiveness of alerts in protecting consumers. The evaluation will look at the effectiveness of changes to processes, the package of guidance and materials introduced, as well as the efficiency of their implementation. We will refer to the post 2019 recalls/ system as ‘the new system’ and pre 2019 as ‘the old system’.

My name is [Name of interviewer], and I am an evaluator from the RSM research team. Thank you for agreeing to participate in this interview.

As part of this evaluation, we are interviewing food businesses with recent experience of recalls/withdrawals to share their experiences for case studies. The interview will cover:

- your recent experience
- your awareness and feedback on the improved system and package
- communications with consumers
- future planning
- any other thoughts or recommendations you might have

This discussion should take 45 to 60 minutes via MS Teams.[INFORMED CONSENT TAKEN – check participant understands how their data will be processed and check if they have any questions. Gain explicit consent for audio recording of interview. Confirm confidentiality – for example, Are they happy for their company name to be used in a case study].

Introduction

1. Please can you describe your role within this recall/withdrawal incident?

Experience of the recent product recall/withdrawal

2. Please can you describe what happened during the (insert name) incident?
 - how did the FBO notify consumers?
3. Did the FBO undertake a Root Cause Analysis? (Where they aware of it?)
 - if so, were you successful in finding a cause?
 - did the FBO share these findings with anyone else (for example, with your sector representative body? The FSA?)
4. Is RCA being routinely conducted?
 - if not, why do you think this is the case?
 - from your experience, how successful is RCA in finding a cause and are there any specific barriers to establishing the root cause?

- are these learnings shared more widely within the industry? Are you aware of any learning sharing being carried out by industry??
- do you think that any RCA reports from your business would have helped other businesses avoid the same problems?
- what would you like to see the FSA do in terms of sharing these RCA learnings? [Would you like to be involved in helping the FSA develop this?

5. To what extent did you feel that all parties involved (eg yourselves, FSA/FSS, local authority) were clear on their responsibilities during the recall/withdrawal?

- is there anything else that could be done to make these responsibilities clearer?
- [If this is LAs can we ask perhaps?] Are you aware of the reference to RCA in the Food Law Code of Practice and Practice guidance?

Feedback on the new product recall and withdrawal system

6. To what extent (on a scale of one to ten) has the guidance and materials improved:

- timeliness of notices
- consistency of information
- targeting of consumers

7. Was the content and style of communications and guidance/ tools appropriate?

8. What benefits do you think the changes to the recalls and withdrawals system will have for your wider industry? (prompt, sharing of good practice, continuous improvement)

9. Based on your experience, are there any improvements you could suggest for further improving the product recall system?

10. Were there any unintended outcomes of this process?

11. Do you think that industry and enforcement authorities are making good use of the new guidance and package of tools/ support?

12. Is the revised system compatible for all businesses i.e. smaller and medium-sized companies, as well as larger organisations?

Consumers and communications

13. To what extent do you think consumers are aware of what to do during the recalls process?

- has this awareness increased following the introduction of the new system?
- is information about recalls accessible to the public?
- have you experienced an increased number of returns of product to businesses after incidents?

14. What do you think is the best way to alert consumers about product recalls (for example, social media, notices in stores, newspaper advertisements, FSA/FSS websites)?

- why do you say that?
- does the current FSA/FSS guidance and templates take into account social media?

15. In your mind, what does best practice look like in terms of alerting consumers to food recalls?

- what could be done to ensure that best practice is shared within the industry?

Experience of the previous product recall system

16. How does the new system compare with the previous recall system? (for example, clarity of roles, support provided, speed of issuing a recall notice etc)

- to what extent would you say that the new system is an improvement?

• Continuous system improvement

17. What recall data is collected and analysed?

- what are the indicators for success?

How is this data used for system improvements?

Any other comments

18. Do you have any other comments that you would like to share?

The matters raised in this report are only those which came to our attention during the course of our review and are not necessarily a comprehensive statement of all the weaknesses that exist or all improvements that might be made.

Recommendations for improvements should be assessed by you for their full impact before they are implemented. This report, or our work, should not be taken as a substitute for management's responsibilities for the application of sound commercial practices. We emphasise that the responsibility for a sound system of internal controls rests with management and our work should not be relied upon to identify all strengths and weaknesses that may exist. Neither should our work be relied upon to identify all circumstances of fraud and irregularity should there be any.

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