

FSA Strategy: Annual Update on Progress Indicators

FSA 24/06/05 - Board Paper by Strategy Unit

1. Summary

1.1 The FSA strategy “Food you can trust” was [agreed by the Board](#) in March 2022. The strategy commits the organisation to the vision of food that is safe; food that is what it says it is; and food that is healthier and more sustainable. The FSA’s [Three Year Corporate Plan](#) (July 2023) sets out how the strategy will be delivered and progress monitored through a set of high-level progress indicators.

1.2 Evaluating the impact the FSA strategy has on the food system is challenging due to the complexity of the system and the wide range of factors that influence it. The progress indicators provide a high-level view of key aspects of the food system, through which the FSA can identify changes which may require closer scrutiny. More detailed reporting on the FSA’s delivery of activities in the corporate plan is provided through the Business Committee quarterly performance review and Annual Report and Accounts, and a fuller review of the food system will be available in the Annual Report on Food Standards, once published. The progress indicators draw on data that is also used in these reports to provide an annual snapshot, to identify areas that may require further investigation and/or response.

1.3 Baseline data for the progress indicators was provided in the [Three Year Corporate Plan](#), using the latest available data for each indicator, ranging from 2021-2023. This paper provides the Board with the first annual update against these baseline figures. The data is obtained from a variety of sources, both internal and external. Due to the specific nuances around collection of data for each indicator, the most up to date data for the progress indicators ranges from 2022-2024. Where updated data against the baseline is not available, this has been noted.

1.4 Delivery of the strategy is being monitored through the lens of three strategic ambitions:

- Ambition 1: Maintaining food you can trust
- Ambition 2: Maintaining food standards, so that food is safe and is what it says it is
- Ambition 3: Growing our contribution to, and influence on, food that is healthier and more sustainable

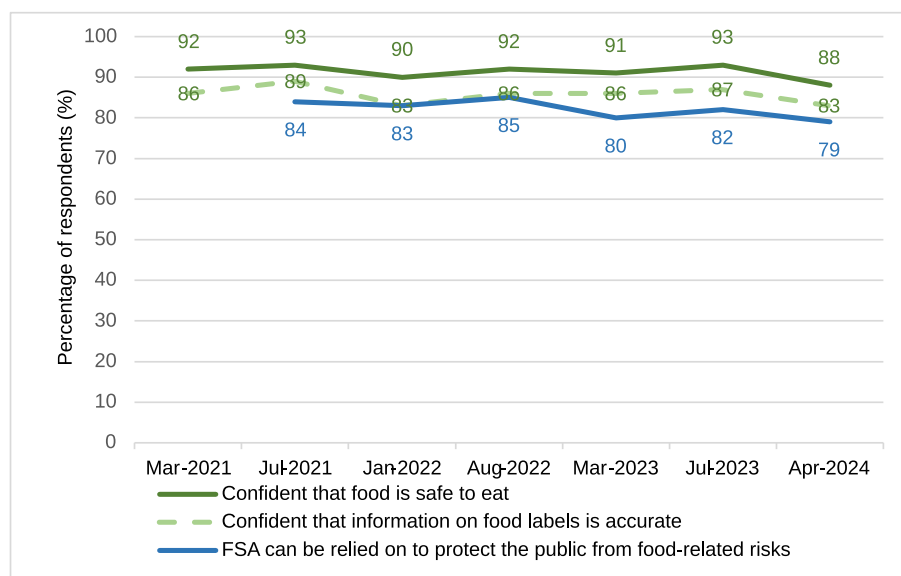
2. Ambition 1: Maintaining Food You Can Trust

2.1 Measuring trust in food and trust in the FSA is complex. Our work has both direct and indirect impacts on trust in the FSA and the wider food system and, as such, progress indicators look at both of these. Those indicators are:

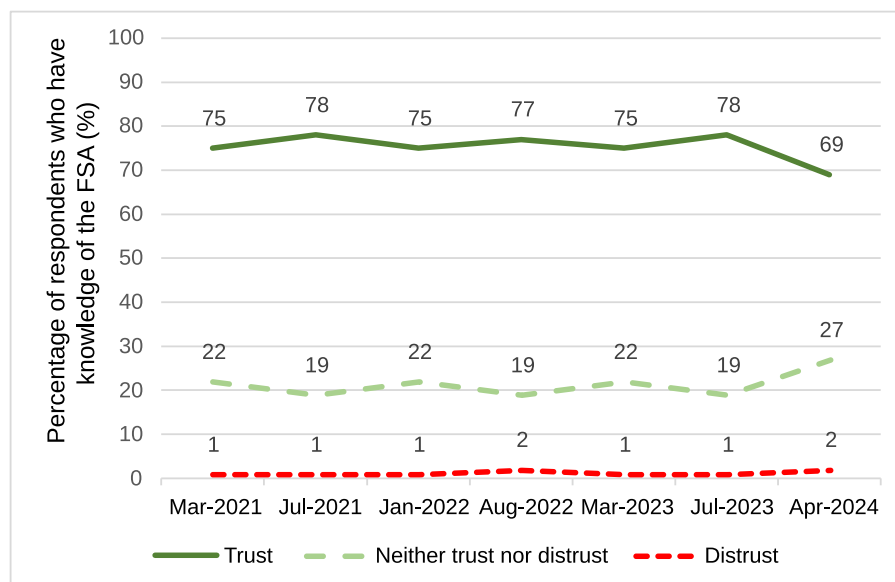
- Food and You 2 survey questions on consumer confidence in the FSA and the food system, specifically:
 - We can rely on the FSA to protect the public from food related risks

- The food we buy is safe to eat
- The information on food labels is accurate
- Research with our wider stakeholders on trust in the FSA.

2.2 Food and You 2: Food and You 2, reported twice a year, provides the FSA's key (official statistic) measure of consumer trust in the FSA. The Food and You 2 data (wave 7, collected in April-July 2023 and published in April 2024) shows that, while confidence on all three areas related to consumer trust remains high, the most recent figures show a decline against each indicator. While these latest results are concerning, it is unclear yet whether this represents an ongoing downward trend or a temporary fluctuation in consumer trust. However, we do have access to other data which indicate that the position may stabilise and/or recover – this is



2.3 Further analysis of the Food and You 2 data shows the overall decline in trust in the FSA is the result of an increase in neutral responses rather than an increase in distrust. Respondents reporting distrust remain low (see Figure 2). These results should be considered within a wider context showing a general erosion of trust amongst the UK public in the government, business and the media ([footnote 1](#)).



2.4 To further explore this issue, other data sources used to monitor trust in the food system and the FSA, including the Consumer Insight Tracker (CIT), have been considered. Although not directly comparable to F&Y2, the use of additional data may give further insight into this trust data and whether this decline may represent the start of a sustained trend.

2.5 The most recent CIT data (figure 3) shows that while subject to some fluctuations, trust in the FSA has remained broadly stable. Since August 2023, neutral responses have decreased, and distrust remains low. Other contextual data ([footnote 2](#)) from quarter 3 2023/24 showed that the FSA's reputation improved significantly in the past quarter and remains ahead of the public sector average. This suggests that the decline in trust indicated in figure 2 may not be sustained, but we will continue to monitor Food and You 2 data.

2.6 Food and You 2 Wave 8 is due to report in quarter 3 of 2024/25. Although we will continue to monitor data around trust, given the importance of the issue it is proposed that we undertake follow up activity now.

2.7 We will explore how we can improve the reach and impact of our communications in a variety of ways, including raising awareness among consumers of our work on consumer protection, and improve the reach of our communications to broader audiences, particularly in population groups where awareness of our work and trust is lower.

2.8 We will also do some further analytical work to understand the drivers of the decline observed in Wave 7. The FSA has previously commissioned research into the drivers of trustworthiness in relation to food, including [Trust in a changing world](#) (2018) which informed, for example, our [risk communication toolkit](#). We will conduct statistical analysis of existing Food and You 2 data to discover what we can about the factors driving lessening perceptions of trustworthiness and where relevant, mistrust. This will inform a new piece of qualitative research which will help us find out why people might be less likely to trust the food system and its regulator in late 2024 than they were in 2018.

2.9 **Stakeholder research:** In the last published data from the Small and Micro FBO Tracker (data collected in 2023 and published in 2024), almost all (98%) of these businesses have heard of the FSA, the same as in 2021. Trust in the FSA, as well as confidence in the FSA achieving its aims and objectives, has remained stable between 2021 and 2023.

2.10 Additional qualitative stakeholder research undertaken in 2023 ([footnote 3](#)) indicates that:

- stakeholders agree we consistently put consumers first in our work, and we are viewed as a transparent organisation who uses high-quality science and evidence
- engagement with the FSA was found to be overall positive, although these are some concerns around resource limitations and staff turnover
- some areas for improvement were identified, including greater clarity about how FSA works across three nations, how the FSA maintains independence in an increasingly complex and political landscape, and possible conflicts between regulatory duties and reducing business burdens. There is also a recognised opportunity for greater innovation through industry collaboration.

2.11 **In conclusion for strategic ambition one**, whilst trust in the FSA and wider food system remains high, there is a decline from the previous year. In response to this, we propose to undertake the steps outlined in paragraphs 2.7 & 2.8 to understand more fully what may be causing this decline and to take action to address it.

3. Ambition 2: Maintaining food standards, so that food is safe and is what it says it is

3.1 Food businesses are responsible for delivering food that is safe and is what it says it is. The FSA has influence both directly (through our regulatory activities) and indirectly (via our work with Local Authorities who regulate most food businesses).

3.2 The indicators against this strategic goal are:

- Rates of foodborne disease (4 key pathogens)
- Rates of business compliance (FHRS, meat processing establishment inspections and dairy inspections)
- Food incidents and allergen related food incidents
- Targeted sampling of food product compliance
- Responses to food crime

3.3 **Foodborne disease:** the FSA monitors food safety through numbers of reported cases of foodborne disease associated with the annual rate of four key pathogens, as set out in the Foodborne Disease Framework. The data is supplied to the FSA by the UK Health Security Agency with the most recent data covering the period 1 January – 31 December 2022.

3.4 The detailed graphs and data have not been provided in this report, as the 2022 data has been published and analysed in detail in the [2022 Annual Report on Food Standards](#) and the [2022-2023 Annual Report and Accounts](#). The Board also received an update on foodborne disease in March 2024.

3.5 High level findings in relation to data from 2021 to 2022 are that reports of Salmonella increased but did not fully return to pre-pandemic levels, whereas Campylobacter and Listeria monocytogenes reported during 2022 remained comparable to pre-COVID-19 levels. Reports of STEC O157 rose in 2022 to the highest reported UK rate since 2015. This increase is mostly attributable to two large national outbreaks investigated in summer of 2022 (one foodborne and one person-to-person). The drivers of the changes in trends observed during the COVID-19 pandemic are likely to be multifactorial and vary by pathogen, and the impacts are not fully understood at present.

3.6 **Business compliance:** food businesses are inspected to ensure that they comply with both food hygiene and food standards requirements. Inspection results ([footnote 4](#)) are key indicators of food safety and standards. The indicators linked to rates of business compliance show no significant change against 2021 baseline data. The latest available data shows:

- food businesses achieving an FHRS rating of 3 or better (96.9%, unchanged since March 2023)
- meat food business operators being rated as “good” or “generally satisfactory” (98.5%, slightly lower than the 98.7% in March 2023)
- dairy establishments being rated as “good” or “generally satisfactory” (98.5% for England and Wales, up from 98.1% in 2022; 99.3% for Northern Ireland, up from 99.2% in 2022).

3.7 **Food incidents & allergen incidents:** food incident data provides insight into how safe and authentic food is for consumers. It can be used to identify problems in the food supply chain, and a primary function of the incident management role is to ensure that products not compliant

with relevant safety legislation are removed promptly from the market to help ensure safety and authenticity of food.

3.8 The overall food incident data shows a decrease in the total number of incidents (figure 4) and the number of allergen incidents (figure 5) reported in 2023/24. As a proportion of total numbers of incidents, allergen incidents have comprised between 13-15% per year over the past three years.

3.9 Incident numbers can fluctuate for a variety of reasons, and changes in reporting levels do not of themselves indicate material changes in food safety or standards. Reported incident numbers are unable to illustrate the complexity and amount of work required to respond to each event. While the numbers of individual incidents reported has decreased this year, the Incidents and Resilience Unit advise that the overall time spent on incidents and outbreak management is considerably more year on year.

3.10 More detailed reporting and thematic analysis of incidents can be found in the Annual Incident Report Board paper.

Fig 5. Number of allergen incidents reported per financial year

3.11 **Food crime:** The key indicator linked to food crime is that of crime disruptions (an action which is confirmed to have reduced the risk of harm done by food crime). Compared to the baseline data of 67 disruptions in 2021/22, the number increased in 2022/23 to 85 and returned to 68 in 2023/24. The NFCU recorded fewer disruptions in 2023/24 (22 fewer compared to 22/23) against 2,4-Dinitrophenol (DNP) which is assessed as a potential consequence of the Unit's scanning and operational activities resulting in a reduction in DNP sellers advertising on the open web, which would ultimately lead to fewer disruptions being recorded. This indicates the impact that our activities could have in reducing risks of harm done by food crime.

3.12 **Targeted sampling of food:** the FSA targeted survey is a national surveillance programme run by the FSA to target key points of food system vulnerability. It provides a snapshot of how well a range of food products comply with food safety and standards, including authenticity issues and the presence of allergens and contaminants. The targeted survey programme is separate and additional to the routine food safety and authenticity sampling carried out by Local Authorities.

3.13 The targeted survey for 2023/24 reported back on authenticity testing of around 500 food samples, finding that compliance remains high, with 89% of samples compliant (no change from 2022/23).

3.14 **In conclusion for strategic ambition two**, the data shows there has been minimal change over the past year in indicators for food is safe and is what it says it is. This indicates that our strategic approach is on track and further analysis to inform further work in this area is not required at this point.

4. Ambition 3: Growing our contribution to food that is healthier and more sustainable

4.1 As outlined in our Strategy, the FSA's primary focus remains to maintain food that is safe and is what it says it is. Accordingly, the majority of the organisation's activities are directed in these areas.

4.2 Our approach to food that is healthier and more sustainable is newer, and our ambition is to increase our contribution in this space. We recognise that the FSA's ability to influence whether food is healthier and more sustainable is more limited than for food that is safe and is what it says it is, with other government departments holding policy responsibility for most of these areas. However, we retain our remit for dietary health in Northern Ireland and maintain activity levels in this area.

4.3 The FSA has focussed on growing our contribution by making some targeted and impactful contributions with the investment of a small amount of resource. In line with discussions at the Board retreat in October 2023, we are prioritising delivering on existing commitments rather than initiating new projects and will only consider additional work on a case-by-case basis.

4.4 The agreed indicators for this ambition focus on consumer attitudes about healthier and more sustainable food and on our contributions, rather than food system outcomes. As agreed with the Board as part of the Three-Year Plan, indicators for this strategic ambition would be a combination of both quantitative and qualitative data, using illustrative case studies.

4.5 The indicators against this strategic goal are:

- Food and You 2 data on consumer behaviour

- Northern Ireland – case studies and data, including:
 - Making Food Better Programme (previously known as Eating Well Choosing Better) and associated surveys
 - Calorie Wise
 - MenuCal
- Growing our contribution:
 - Case studies and data

4.6 **Food and You 2:** Recent data for the two consumer attitude indicators described in the Three-Year Plan are not currently available due to amendments to question wording and timing of publication. These are: “Changes respondents had made [to food-related behaviours] in the previous 12 months” and “Common reasons that respondents had eaten less of specified foods in the previous 12 months”. It is therefore not possible to give meaningful updates against these indicators. An alternative question from Food and You 2 Wave 7 is therefore provided, giving insight into consumer concerns about healthiness and sustainability, using Wave 5 data as a comparative baseline.

4.7 Where respondents reported a concern about food, there was an increase in spontaneously expressed reasons for that concern being “nutrition and health” (21% respondents in Wave 5, versus 30% of respondents in Wave 7), indicating that consumers are increasingly concerned about the healthiness of food, underscoring why this remains an important element of our strategy. “Environmental and ethical concerns” as a reason for being concerned was stable at 17% across both waves.

4.8 One emerging area of consumer concern currently is ultra-processed food (UPF) where the FSA has been acting in the “convenor and collaborator” and “watchdog” roles. Recent activity has included provision of evidence to the recent House of Lords inquiry and the publication of [information for consumers](#) on UPF.

4.9 **Northern Ireland:** The Making Food Better Programme aims to support Northern Ireland food businesses to make the food environment healthier. Data from the Making Food Better Consumer Tracker Survey (2023, awaiting publication) showed that between 2021 and 2023

- there is a mixed picture in relation to awareness of recommended daily calorie intake. Female respondents have shown an increase from 20% to 25%, while male respondents have decreased from 21% to 15% in
- understanding of the traffic light label has increased, from 79% to 93%
- 43% of consumers use the traffic light label, up from 42%

4.10 In 2022/23, 18,209 new recipes were added to the MenuCal tool by businesses, with this reducing to 10,129 in 2023/24 (comparable to 2021/22). The large increase in 2022/23 is thought to have been influenced by the introduction of mandatory calorie labelling in the Out of Home Sector in England in April 2022.

4.11 **Growing our contribution:** the FSA has contributed to a number of projects contributing to making food healthier and more sustainable that are delivered in partnership with others. In the Three-Year Plan, there is a commitment to providing indication of the FSA’s progress in this area through the inclusion of case studies, and some examples of these are in [Appendix A](#).

4.12 **In conclusion for strategic ambition three,** we have grown our contribution to food that is healthier and more sustainable through a variety of means, including our activity in Northern Ireland and a variety of cross-government projects. This element remains an important part of the FSA strategy, particularly given their importance to consumers. The FSA will continue to deliver specified projects and monitor data in line with the organisation’s strategic ambitions.

5. Conclusions

5.1 The progress indicators provided aim to give a high-level picture of the food system as a whole, potentially indicating areas that the organisation may need to look at more closely from a strategic perspective. Our review of the progress indicators at this time indicates that, for ambitions two and three, our strategic direction of travel is broadly still on track. A key emerging area to explore further and take action relates to consumer trust, as explored in section 2 of this report.

5.2 The Board is asked to:

- Note the findings of the report, and
- Agree to the actions in paragraphs 2.7 and 2.8 in response to the observed decline in the trust indicators.

Appendix A – case studies

Case study 1: Food Data Transparency Partnership

Work on the Food Data Transparency Partnership (FDTP) began in summer 2022 and is a long-term partnership between the Department for Health and Social Care (DHSC), Defra, the FSA, industry, academia and civil society. It aims to drive positive change for health and the environment in the food system through better and more transparent food data. The metrics and reporting coming out of FDTP will assist businesses, investors and consumers to produce and consume healthier and more sustainable food.

The sustainability work strand, led by Defra, aims to increase the transparency of environmental impact data, beginning with streamlining the quantification and communication of greenhouse gas emissions to meet UK Government's net zero targets. The health work strand, led by DHSC, will develop recommendations for a mutually agreed set of health metrics for large food and drink companies that support companies to report food data in a consistent way.

Work undertaken to date by FSA

The FSA supports DHSC and Defra by considering the technical feasibility of each work strand. This involves considering how businesses will best be able to collect, access, and share relevant data that is consistent and transparent. The aim is to minimise the cost and complexity of reporting metrics, and reduce technical barriers where possible, so that businesses wanting to report metrics have the best chances of success.

To achieve this, the FSA has:

- established and convened the data and technical working group of experts and practitioners from industry and government
- identified key technical issues and developed problem specifications
- reviewed the present landscape of initiatives, proposals, and market offerings in this area to establish where the gaps are in current technical capability
- input into other strands Working Groups' discussions and proposals to ensure a cohesive approach. This includes contributing to a [roadmap paper](#) recently published Defra, which is a major milestone.

Stakeholders

One of the core values of the FDTP is its collaborative co-creation approach across government, industry and academia. Stakeholders from across the food and agriculture sector are engaged with regularly, encompassing individual food businesses as well as trade associations, industry bodies, academics and the third sector. Beyond the food sector, data service providers

performing tasks such as carbon footprint calculation, or initiatives looking at areas like data governance, have been crucial stakeholders.

Case study 2: The School Food Standards (SFS) compliance pilot

The School Food Standards (SFS) compliance pilot is a collaboration with the Department for Education, with support from the Office for Health Improvement and Disparities. It ran across 18 local authorities (LAs) from September 2022 until July 2023. The reports on the findings of the [Discovery Phase](#) and [Feasibility Phase 1](#) were published in November 2023. The final report is expected to be published following the general election.

The purpose of the pilot was:

- to test if Food Safety Officers (FSOs) carrying out food hygiene inspections could ask questions related to the SFS to identify potential instances of non-compliance; and, where non-compliances were identified,
- whether LA teams were able to provide improvement support to schools.

The pilot did not require FSOs to check if all food provision was compliant with the SFS. Instead, the focus was on food provision provided by the food business operator undergoing the food hygiene inspection.

The pilot was a mixed methodology study comprising of both quantitative and qualitative research. It encompassed a variety of stakeholders, including LAs, caterers and schools. While the pilot was carried out in England, Local government employees in Scotland and Wales were also engaged in the Discovery Phase to provide oversight of approaches to school food in the devolved administrations to help understand the context for the pilot.

Caveat: Findings are unlikely to be nationally representative as LAs were self-selecting, and therefore likely had a higher level of engagement with school food and potentially more resource and expertise in this area than other LAs in England.

Key findings from the Discovery report:

- LAs indicated that existing approaches to assuring compliance with SFS varied widely, with some LAs having developed interventions while others had little or no oversight of school food provision
- LAs felt it was feasible for FSOs to conduct the SFS check alongside existing food hygiene inspections within certain parameters e.g. the check should last 20 minutes at most, with clear guidance and prescribed questions available
- LAs felt they should inform schools about results of the check at the end of the visit, including that school details would be passed on to relevant LA teams for action.
- Key findings from Feasibility Phase 1 report:
- FSOs were generally positive about administering the SFS check and felt it did not significantly impact on food hygiene inspections
- However, they did highlight some issues that impacted on their ability to conduct the check, most notably about kitchen staff being effectively prepared and able to answer questions or provide guidance
- All LAs informed schools of their check results or were planning to do so and in some cases had initiated more intensive action to support schools to address the potential non-compliance where it was identified.

Case study 3: Healthier and more sustainable vending in Northern Ireland

The work on healthier and more sustainable vending stems from a wider agenda to develop and implement nutritional standards in catering, procurement and vending across the public sector in

Northern Ireland (NI). This is one of the outcomes of the NI obesity strategy and is also in line with the FSA's third pillar of the strategy. The work started with a multi partner project on nutritional standards in health and social care settings in NI which is now being implemented.

Engagement with councils has included a co-creation exercise on nutritional standards where it was decided to focus on vending and regular steering group meetings with representatives from local councils which approved the standards for vending. Work is ongoing with councils at an individual level to support implementation of the standards.

At the same time a programme of engagement was started with vending operators in NI. As well as meetings with trade bodies such as the Automatic Vending Association (AVA) and National Independent Vending Operators (NIVO), the team held one-to-one meetings with vending operators and suppliers in Northern Ireland. We believed it was important to involve industry so they could ensure that they would have products to offer that were compliant with the standards.

This work culminated with the 'Healthier and more sustainable vending' event in March 2024 which succeeded in bringing together vending operators and suppliers, local councils, and public sector procurement to discuss nutritional standards and how they could be implemented. This was the first event of its kind in NI. We also invited small local business to the event with compliant products to start the conversation with both operators and procurement teams on how to get their products in vending machines.

The in-person vending event included 10 expert speakers from public sector, industry, and consumer backgrounds, 14 exhibitors from the local food manufacturing and vending industry and 97 delegates attending. The event received positive feedback, particularly from industry, with 80% of participants indicating they were likely or very likely to introduce nutritional standards in their organisation.

The event also marked the publication of the 'Healthier and more sustainable vending guide' which will be a pivotal resource in supporting the implementation of nutrition standards in vending. The guide suggests setting a calorie cap for sweet and savoury snacks, restricting the sale of sugary drinks, and sets targets for the percentage of water, low sugar drinks, milk-based drinks, fruit and vegetable drinks and smoothies in vending machines. The guide also suggests tips and ideas to make vending more sustainable which supports local councils in their objectives under the Climate Action Plan for Northern Ireland Councils.

Next steps involve collaborating with local councils in NI to support implementation of nutritional standards in vending. We will independently evaluate implementation of the standards, where we can monitor the impact, changes to profitability as well as collecting lessons learned which can be shared more widely. As well as collaborating with councils we will continue engagement with other departments to discuss the introduction of nutrition standards for vending in their locations. We will also continue our engagement with the vending industry and since the event have spoken at a NIVO event to vending operators and suppliers about nutritional standards.

1. [Trust in Government Survey 2023, 2023 Ipsos Veracity Index \(Trust in Professions Survey\)](#), the [2024 Edelman Trust Barometer](#)
2. The source report is unpublished, and we are therefore unable to provide further details in this paper
3. The source report is unpublished, and we are therefore unable to provide further details in this paper

4. More detailed analysis on business compliance will be available in the Annual Report on Food Standards