



# Provision of Allergen Information in the Non-Prepacked Sector

SMEs Topic Guide

# NOTE TO RESEARCHER

The Food Standards Agency (FSA) has commissioned Basis Social to conduct qualitative research with SMEs across a range of different service models within the non-prepacked sector, as well as various trade bodies within the sector.

The objectives of the research are to understand:

- How SMEs currently provide allergen information to consumers (including any written or digital materials) and the reasons for this approach.
- The challenges SMEs face in providing accurate allergen information to consumers.
- The challenges SMEs face in managing allergen cross-contact.
- The challenges and benefits of a range of different options for providing allergen information to consumers

To achieve these objectives, Basis Social will be conducting:

- 40 in-depth interviews with SMEs. Each interview will be 60 minutes in duration. 30 of these will be conducted online, and 10 in-person (see below)
- Of these, 10 of the in-depth interviews will be considered as 'ethnographic deep dives' to help bring to life the allergen management and communication practices for different SMEs. These will be conducted in person and photographs will be used to explore how customers are being served and recording the physical layout of the establishment.
- 14 in-depth interviews with trade bodies to gain a sector wide view on allergen labelling practice in businesses selling non-prepacked foods.

This document includes the topic guide for the SME in-depth interview. It also provides an overview of the pre-task that all SMEs will be required to complete, including details on how the data generated via this task should be coded by the researcher.

For questions on:

- *topic guide/research design*, please flag these with Darren ([darren.bhattachary@basisresearch.co.uk](mailto:darren.bhattachary@basisresearch.co.uk)) or Tom ([tom.curran@basisresearch.co.uk](mailto:tom.curran@basisresearch.co.uk))
- *Zoom platform or project logistics more generally* flag these with Sheena ([sheena.thakrar@basisresearch.co.uk](mailto:sheena.thakrar@basisresearch.co.uk))

# PRE-TASK

## DATA COLLECTION

Prior to the interview, SMEs will be asked to send in photos of all of the following that are used in their establishment:

- The establishment itself, including where food is served, till areas, customer seating areas and general customer surroundings
- The kitchen
- Written menu (all pages included and legible)
- Any other formats used to provide written information about allergens, e.g. display/specials boards, chalk board, display counter signs (all included and legible)
- Any food matrices

SME will also be asked whether they use any form of digital ordering. If yes, they should provide written information indicating:

- What form(s) of digital ordering they use, e.g.
  - own website
  - own mobile app
  - in premises digital ordering table
  - Third party delivery service, such as Just Eats, Uber Eats, Deliveroo
  - Other (please specify)
- Names of (and, if possible, links to) any owned digital assets, such as website or app

## PRE-INTERVIEW REVIEW / STIMULUS CREATION

Each interviewee's pre-task photos and responses should be reviewed by the interviewer before the interview takes place.

Interviewers should complete the grid below to aid delivery of Q.6-8.

	Photo sent in? Y/N	Allergen information present? Y/N	All 14 allergens identified? Y/N
Written Menu			
Signs and boards (e.g. display, specials, etc.)			
Food matrix			

Interviewers should also prepare slides containing the photos sent in by the interviewer, to be used as stimulus during the discussion. These slides should include: (1) photos of the establishment and kitchen and (2) any written material used to communicate allergens information.

# TOPIC GUIDE

## Introduction (5 mins)

My name is [XXX]. I work on behalf of Basis Social. We are an independent research agency who have been asked to carry out this research with you on behalf of the Food Standards Agency (FSA). The FSA are a food regulator, who make sure food is safe and what it says it is.

As part of their food hypersensitivity (FHS) programme of work, the FSA is considering options to help people with food hypersensitivities make safe, informed decisions when purchasing non-prepacked food. This is food which is sold loose, or which is packed or served to order, for example, takeaway food and food served in restaurants and cafes. Food hypersensitivity is a collective term for food allergy, intolerance, and coeliac disease

They have commissioned this research to understand how small businesses provide allergen information to their customers, any challenges they face doing this, how allergen cross contact is managed, and to explore some options for providing allergen information in the future.

The interview will last for one hour. We have a lot to get through so please excuse me if I move the conversation on at times.

This interview is confidential and will only be used by the research team. You don't have to answer any question if you don't want to, you can just ask us to move on. We're really keen to learn, so I'd very much appreciate your open and honest responses.

We would like to record this discussion but only if you are happy with this. The recording is used to ensure we have an accurate record of the discussion for analytical purposes and is not shared with the FSA. Do you have any concerns or worries about this? If so, please don't hesitate to raise these now or throughout the interview – it won't affect your participation in this research as I can take notes. If you are happy, I'll start recording the session now. [Gain verbal consent].

Additionally, we may wish to use quotes in our report to help illustrate findings. Any quote would be anonymised. Are you happy if we use anonymised quotes from the session?

In the consent form, we also mentioned the possible use of photos in the report, which we would anonymise and share back with you before any use. Are you happy if we use anonymised photos of the business?

Finally, Basis are a company partner of a body called the Market Research Society and abide by their code of conduct. Participation in this discussion is completely voluntary and you are able to withdraw your consent to participate at any point in the process. This includes during this discussion, or up until the report is published at the end of March 2023.

Any questions before we start?

**NOTE TO MODERATOR: QUESTIONS HIGHLIGHTED IN **YELLOW** MAY BE SKIPPED IF SHORT ON TIME. HOWEVER, PLEASE TRY TO COVER THE WHOLE GUIDE IF POSSIBLE.**

### **Section 1: Understanding the business and service delivery model (5 mins)**

**MODERATOR OBJECTIVE:** To gather background info on how the business works, paying special attention to any factors that could affect allergen information provision

Let's begin by getting to know your business a bit better.

1. Could you start by giving me an overview of the business and how it works?
  - a. What is your role in the business
  - b. How is business going? Are there any challenges you're facing?
  - c. What kind of food do you sell?
    - i. Probe for prepacked, prepacked for direct sale and non-prepacked

## Definitions

Prepacked food (food put into packaging at one premises before being placed on sale in another premises, for example, a chocolate bar packed in a factory before being sold in a retail shop)

Prepacked for direct sale (PPDS) (food which is packaged at the same place it is offered or sold to consumers and is in this packaging before being ordered or selected, for example, sandwiches packed on site before being offered to consumers)

Non-prepacked/loose food (food which is sold loose, or which is packed or served to order, for example, takeaway food and food served in restaurants and cafes).

d. Describe a typical day?

i. What are your busiest days and times of day?

e. How many staff do you employ?

f. How would you describe working in the business?

g. How would you describe your customers?

i. Demographics?

ii. Regulars vs. one-time visitors?

h. If I was a customer, can you describe to me how I would be served?

Probe

i. Where would I order

a. Options to order online / pre-order?

ii. information to help me order

iii. how my order would be taken, what would be said and by whom

iv. How my order sent to the kitchen

v. [Where applicable] How would the process differ if I ordered online or pre-ordered?

## Section 2: Knowledge about and attitudes towards allergen information provision requirements (10 mins)

**MODERATOR OBJECTIVE:** to assess how well food businesses understand allergen risks (inc. those present in their business) + approaches to managing cross-contact risks

2. Thinking about food safety, what would you say are the main food risks to your customers?
  - a. Probe food poisoning, allergens
3. Thinking about allergens specifically, what allergens are present in your kitchen?
  - a. Probe for 14 allergens

### 14 ALLERGENS

The 14 allergens are: celery, cereals containing gluten (such as barley and oats), crustaceans (such as prawns, crabs and lobsters), eggs, fish, lupin, milk, molluscs (such as mussels and oysters), mustard, peanuts, sesame, soybeans, sulphur dioxide and sulphites (if they are at a concentration of more than ten parts per million) and tree nuts (such as almonds, hazelnuts, walnuts, brazil nuts, cashews, pecans, pistachios and macadamia nuts).

4. Do you think there is much risk from these? Why? Are there any allergens you are particularly mindful of? Any you feel are less of a risk?
5. Do you offer any allergen free dishes, foods or drinks? Why/why not?
6. How do you manage the risk of allergen cross contact when making food? **IF SENT IN, SHOW PICTURE OF KITCHEN FOR REFERENCE**
  - a. Do you use separate chopping boards and utensils?
  - b. Do you use separate appliances (e.g.cookers, fryers)?
  - c. Do you have a separate preparation area for preparing allergen free meals?
  - d. Do you use a food matrix? If so, why?
7. Is there anything about your approach to managing cross-contact risks that you think



works particularly well? Why?

8. Do you experience any challenges managing cross-contact risks? Why?

### Section 3: Allergen information provision practices (25 mins)

**Moderator objective:** to gather data on:

- How food businesses communicate allergen information and why
- Enablers and barriers of different approaches
- How food businesses respond when made aware of a customer's allergy

OK, let's move onto what your businesses' actual practices are when it comes to allergen information provision.

9. Overall, how do you communicate about allergens to customers? (**8 mins**)

I've got some of the photos of **YOUR ESTABLISHMENT** here with me, which I'd like you to use to help guide me through your approach to allergen information provision.

10. Using these photos as a reference point, could you show me where in your establishment this communication happens?

11. How is the information communicated to customers here?

*Probe to fill any information gaps, as required, using any photos of written materials as prompts where appropriate.*

a. How is the information communicated – e.g. verbally, written, mix? Why this approach? (Media)

i. If technology is used (e.g. QR codes) ask how this works in terms of communicating allergen information

b. How does the conversation start? (Trigger)

i. Probe: initiated by customer or staff?

c. Who from the business side communicates the information? Why? (Messenger)

d. What information do they communicate? Why? (Message)



- e. Do you have any (other) written materials / aids / tools to help communicate the information? Why? (Media)
  - i. Probe for use of food matrix with customers
- f. [If interviewee uses any written media]: how do you ensure that this information stays up to date?

Now let's take a look at the photos of the **MENUS & OTHER SIGNS/NOTICES** you sent into us  
(9 mins)

*Review pre-task coding exercise and call out any gaps in provision of information / breadth of allergens mentions. Ask below, as appropriate, for menus, display boards, counter boards, food matrix, etc.*

- 12. [If no photo sent in] I noticed you haven't sent in a photo of [X] – **does your establishment have one** [if not mentioned above]? [And to confirm] **Does it show allergen information?** [if no go to Q13. If yes, go to Q14]
  - a. If business does not have a [menu/board/sign], why?
  - b. Are there any barriers preventing you from doing so? If so, what are they?

Probe to understand COM-B barriers e.g.

- i. Understanding of what meant to do (Psychological Capability)*
- ii. Language barriers (Physical Capability)*
- iii. Lack of space in restaurant or on menu (Physical Opportunity)*
- iv. Time or resource constraints (no money, too busy) (Physical Opportunity)*
- v. too difficult menu changes a lot (Physical Opportunity/Reflective Motivation)*
- vi. not seen as necessary / useful to the business/customers (Reflective Motivation)*
- vii. Too difficult - ingredients used can vary depending on availability*

- 13. [If photo sent in but written material doesn't contain allergen information] I couldn't see any allergen information included in [X] – is that correct?

- a. If yes, why not? Probe to understand any COM-B barriers, e.g.
  - i. Understanding of what meant to do (Psychological Capability)*
  - ii. Language barriers (Physical Capability)*
  - iii. Lack of space in restaurant or on menu (Physical Opportunity)*
  - iv. Time or resource constraints (no money, too busy) (Physical Opportunity)*

- v. *too difficult menu changes a lot* (Physical Opportunity/Reflective Motivation)
- vi. *not seen as necessary / useful to the business/customers* (Reflective Motivation)

14. If photo sent in and written material and mentions allergens

- a. What motivated you to do this? Did you face any challenges? Probe to understand any COM-B enablers/challenges, e.g.
  - i. *Understanding of what meant to do* (Psychological Capability)
  - ii. *Language used* (Physical Capability)
  - iii. *Space in restaurant or on menu* (Physical Opportunity)
  - iv. *Time or resources required* (Physical Opportunity)
  - v. *How cope with changes to menu* (Physical Opportunity/Reflective Motivation)
  - vi. *why seen as necessary / useful to the business/customers* (Reflective Motivation)

15. Are all of the 14 allergens covered by legislation shown on the written materials if they are present in the kitchen?

- a. If not, why? [Probe COM-B barriers, as above]

## 14 ALLERGENS

The 14 allergens are: celery, cereals containing gluten (such as barley and oats), crustaceans (such as prawns, crabs and lobsters), eggs, fish, lupin, milk, molluscs (such as mussels and oysters), mustard, peanuts, sesame, soybeans, sulphur dioxide and sulphites (if they are at a concentration of more than ten parts per million) and tree nuts (such as almonds, hazelnuts, walnuts, brazil nuts, cashews, pecans, pistachios and macadamia nuts).

16. Do your customers or staff ever encounter any challenges using these written materials?

- a. If so, please describe

Now let's talk about what happens when a customer indicates they have a food hypersensitivity  
(8 mins)

17. What are the steps that you / your staff follow if a customer indicates they have a food hypersensitivity?

*Probe to fill any information gaps, as required, using any photos of written materials as prompts where appropriate.*

- a. Who is notified? Why?
- b. What steps / actions do are taken? Why?
- c. What are the ways staff can find out which allergens may be present in which dishes?
- d. [If **FOOD MATRIX** not mentioned/sent in] have you considered using a food matrix? Why / why not?  
Probe to understand any COM barriers, e.g.
  - i. too difficult (maybe because menu changes a lot, too many items, etc.)
  - ii. time, space and resource constraints (no money, no room, too busy)
  - iii. no motivation (not seen as necessary / useful to the business/customers)
- e. Thinking about the process you have in place:
  - i. Why does it work well for your business?
  - ii. Are there any parts of the process that you think could be improved? What and why?

18. Are you aware of any legal requirements for communicating about allergens?

- a. Could you explain the requirements to me?
- b. Where do you get this information from?
- c. Is it easy to understand. Why/ why not?
- d. Do you undertake allergen training in the business? If no, why? If yes, please describe:
  - i. What training do you use?
  - ii. Who receives it?
  - iii. How often is it taken?

## Section 4: Options Testing (15 mins)

**MODERATOR OBJECTIVES:** To gather feedback on 3-5 options for improving accuracy of allergen information, using the APEASE framework as a guide

For the final 15 minutes, I want to present some options to improve the accuracy of allergen information in the non-prepacked sector.

I'd like to understand the practicalities of implementing these different options and the benefits and challenges they might present for your business.

Please bear in mind that all these options are only early ideas at this stage. The goal today is to gather your feedback so that they can be developed and improved by the FSA.

**NOTE TO MODERATOR:** PLEASE MIX THE ORDER IN WHICH THE FIRST THREE OPTIONS ARE PRESENTED TO INTERVIEWEES

19. The first option is for food businesses to **provide a full, written list of ingredients for each dish** – for example, by including this list below each item on the menu or a board. Alternatively, this could be a separate document with this information which can be requested by customers.
- a. What are your first thoughts and impressions when hearing this option?
    - i. Do you have any questions about this option?
    - ii. Do you think it would provide any benefits? If so, what and why?
    - iii. Do you think it would result in any challenges? If so, what and why?
    - iv. Do you have any preferences or views on:
      - a. Including on a menu or board
      - b. Including a separate document with this information which can be requested by customers
      - c. FBOs can choosing how they indicate the presence of allergens
    - v. Why?
  - b. How **practical** would it be for you to implement this as part of your food business?
    - i. How easy/feasible would it be?
  - c. How **effective** do you think this option would be in reducing allergen risks to customers?

- i. Why / why not?
  - d. Do you think implementing this option could have any **unintended consequences**?
    - If yes, what and why?
    - Would there be any wider benefits from this option?
  - e. What would be the **cost** of implementing this in your business?
    - i. Do you think there may be businesses who might be more able to absorb these costs? If yes, which ones and why?
  - f. Would you be more likely to comply if this was mandatory rather than voluntary?
  - g. Overall, what do you think about this option?
20. The second option is for food businesses to **indicate the presence of any of the 14 allergens** in each dish – for example, by writing or using standardised symbols next to each item on the menu / board
- a. What are your first thoughts and impressions when hearing this option?
    - i. Do you have any questions about this option?
    - ii. Do you think it would provide any **benefits**? If so, what and why?
    - iii. Do you think it would result in any **challenges**? If so, what and why?
    - iv. Do you have any preferences or views on:
      - a. Using standardised symbols
      - b. The allergen being communicated in writing
      - c. FBOs can choosing how they indicate the presence of allergens
    - v. Why?
  - b. How **practical** would it be for you to implement this as part of your food business?
    - i. How easy/feasible would it be?
  - c. How **effective** do you think this option would be in reducing allergen risks to customers?
    - i. Why / why not?
  - d. Do you think implementing this option could have any **unintended consequences**?
    - If yes, what and why?
    - Would there be any wider benefits from this option?
  - e. What would be the **cost** of implementing this in your business?

- i. Do you think there may be businesses who might be more able to absorb these costs? If yes, which ones and why?
- f. Would you be more likely to comply if this was mandatory rather than voluntary?
- g. Overall, what do you think about this option?

21. A third option is for food businesses to **provide a written notice on the menu or next to the information consumers are using to select their food** asking people with allergies or intolerances or coeliac disease to notify staff before ordering food

#### INFO FOR INTERVIEWER:

The current requirement is for FBOs to provide information on the 14 allergens or signpost consumers to where they can get the information. Under current requirements the sign needs to be in a visible place. What we are suggesting is having this information appear next to the information which consumers are using to order their food. NB. There would be no onus on the customer to follow the instruction on the sign.

- a. What are your first thoughts and impressions when hearing this option?
  - i. Do you have any questions about this option?
  - ii. Do you think it would provide any benefits? If so, what and why?
  - iii. Do you think it would result in any challenges? If so, what and why?
- b. How **practical** would it be for you to implement this as part of your food business?
  - i. How easy/feasible would it be?
- c. How **effective** do you think this option would be in reducing allergen risks to customers?
  - i. Why / why not?
- d. Do you think implementing this option could have any **unintended consequences**?
  - i. If yes, what and why?
  - ii. Would there be any wider benefits from this option?
- e. What would be the **cost** of implementing this in your business?
  - i. Do you think there may be businesses who might be more able to absorb these costs? If yes, which ones and why?
- f. Would you be more likely to comply if this was mandatory rather than voluntary?
- g. Overall, what do you think about this option?

**[IF TIME PERMITS, EXPLORE OPTIONS 4 and 5, show in Annex, and amend Q22 as required]**

22. Of the three (/five) options we have just discussed, which is the most and which is the least acceptable to you? Why?

#### **OPTIONS RECAP**

1. food businesses to provide a full, written list of ingredients for each dish
2. food businesses to **indicate the presence of any of the 14 allergens** in each dish
3. food businesses to **provide a written notice** on a menu or next to the information consumers are using to select their food asking people with allergies or intolerances or coeliac disease to notify staff before ordering food  
**-- IF COVERED --**
4. food businesses to **verbally ask all customers** whether they have any food allergies or intolerances or coeliac disease
5. A fifth is for food businesses to **verbally confirm** to the customer when the food is being served that a dish that has been requested to be free of a particular allergen has been made in such a way as to be free of that ingredient.

23. If you could give one bit of advice to the FSA as they are considering these options, what would it be?

**That completes the questions I have for you today. Is there anything else you would like to raise or questions you may have?**

**Thanks and close.**



## Annex

A fourth option is for food businesses to **verbally ask all customers** whether they have any food allergies or intolerances or coeliac disease

- a. What are your first thoughts and impressions when hearing this option?
  - iv. Do you have any questions about this option?
  - v. Do you think it would provide any benefits? If so, what and why?
  - vi. Do you think it would result in any challenges? If so, what and why?
- b. How **practical** would it be for you to implement this as part of your food business?
  - i. How easy/feasible would it be?
- c. How **effective** do you think this option would be in reducing allergen risks to customers?
  - i. Why / why not?
- d. Do you think implementing this option could have any **unintended consequences**?
  - i. If yes, what and why?
  - ii. Would there be any wider benefits from this option?
- e. What would be the **cost** of implementing this in your business?
  - i. Do you think there may be businesses who might be more able to absorb these costs? If yes, which ones and why?
- f. Would you be more likely to comply if this was mandatory rather than voluntary?
- g. Overall, what do you think about this option?

A fifth is for food businesses to **verbally confirm** to the customer when the food is being served that a dish that has been requested to be free of a particular allergen has been made in such a way as to be free of that ingredient.

- a. What are your first thoughts and impressions when hearing this option?
  - vii. Do you have any questions about this option?
  - viii. Do you think it would provide any benefits? If so, what and why?
  - ix. Do you think it would result in any challenges? If so, what and why?
- b. How **practical** would it be for you to implement this as part of your food business?
  - i. How easy/feasible would it be?
- c. How **effective** do you think this option would be in reducing allergen risks to customers?
  - i. Why / why not?
- d. Do you think implementing this option could have any **unintended consequences**?
  - i. If yes, what and why?
  - ii. Would there be any wider benefits from this option?
- e. What would be the **cost** of implementing this in your business?
  - i. Do you think there may be businesses who might be more able to absorb these costs? If yes, which ones and why?
- f. Would you be more likely to comply if this was mandatory rather than voluntary?
- g. Overall, what do you think about this option?