



Provision of Allergen Information in the Non-Prepacked Sector

Trade Bodies 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 conducting 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 trade body in-depth interview.

For questions on:

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

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).

[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. As part of this, we wish to speak to trade bodies to get a sector wide perspective on this issue.

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?

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?

Section 1: Getting to know the sector (10 mins)

Let's begin by getting to know your organization and sector a bit better.

1. Could you start by giving me an overview of your organisation and your role within it?
2. Could you give me an overview of the sector your organisation represents?
 - a. How would you describe the health of the sector currently? Why?
 - b. What challenges is the sector currently facing?
 - c. What challenges do you see on the horizon?

This research is specifically looking at small and especially micro-food businesses providing non-prepacked and loose food.

3. How would you describe the health of these types of businesses, specifically, within your sector? Why?
 - a. What are their main priorities currently? Why?
 - b. What challenges are they facing?
 - c. What challenges are on the horizon for them?

Section 2: Perspectives on current allergen information provision practices in the sector (15 mins)

4. Thinking about food safety, what are the main challenges small businesses selling non-prepacked food and drink in your sector currently face? Why?
 - a. Probe to understand whether they consider allergens a challenge, and why/why not
5. What are the most common types of practices among small businesses in your sector

for communicating information about allergens to customers?

- a. What are the driving factors leading them to use these practices?
 - b. What, if anything, do you think prevents them from using other types of practices?
6. What are the most common types of practices among small businesses in your sector for managing cross-contact risks?
- a. What are the driving factors leading them to use these practices?
 - b. What, if anything, do you think prevents them from using other types of practices?
7. How effective do you think these types of businesses are in managing risks to customers who have allergens? Why? (Probe for evidence of (in)effectiveness)
- a. If not specifically mentioned, probe for effectiveness communicating allergen information
 - b. What are the barriers / enablers of their effectiveness?

Probe to understand any COM-B barriers, e.g.

- i. Understanding of what meant to do (Psychological Capability)*
 - ii. Language barriers (Physical Capability)*
 - iii. Space in restaurant or on menu (Physical Opportunity)*
 - iv. Time or resource considerations (money, time) (Physical Opportunity)*
 - v. Changing menus (Physical Opportunity/Reflective Motivation)*
 - vi. Perceptions of necessity / utility to the business/customers (Reflective Motivation)*
8. Are you aware of any outstanding examples of good / innovative practice from within your sector in terms of how small food business manage allergen risks to their customers?

Section 3: Opportunities and challenges for improving the management of allergen risks for micro/SME food businesses in non-pre-packed sector (10 mins)

Part of the reason FSA commissioned this research was to identify opportunities and challenges for improving how micro/SME food businesses in the non-pre-packed sector manage allergen risks to customers.

9. Overall, what are your thoughts on providing greater standardization to how businesses communicate allergen risks on non-prepacked foods?
 - a. Probe specific issues for small and micro businesses
 - b. Issues for food hypersensitive consumers
10. What opportunities, if any, do you see for your sector from standardizing practice? Why?
11. What challenges, if any, do you see for your sector? Why?
12. [Unless already addressed]: have there been any learnings from the introduction of Natasha's Law/ allergen labelling for PPDS food.
 - a. What went well?
 - b. What were the problems?
 - c. What could have been improved?
 - d. How do you feel about the mandatory nature of such changes?

Section 4: Options Testing (25 mins)

For the final 25 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 small and micro-food businesses in your sector.

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.

13. 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:
 1. Including on a menu or board
 2. Including a separate document with this information which can be requested by customers
 3. FBOs can choosing how they indicate the presence of allergens
 - v. Why?
 - b. How **practical** would it be for the businesses you represent to implement?
 - i. Why / why not?
 - 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 option? What sort of businesses might be able to absorb these costs?
 - f. What would be the impact, if any, on the sector if:
 - i. This became a **mandatory requirement** for the sector? Why?
 - ii. This was **recommended as voluntary best practice** for the sector? Why?

g. Overall, what do you think about this option?

14. 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. Are there any questions that come to mind when hearing this option?
- ii. Do you think this option would provide any benefits? If so, what and why?
- iii. Do you think this option 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 the businesses you represent to implement?

i. Why / why not?

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 option? What sort of businesses might be able to absorb these costs?

f. What would be the impact, if any, on the sector if:

i. This became a **mandatory requirement** for the sector? Why?

ii. This was **recommended as voluntary best practice** for the sector? Why?

g. Overall, what do you think about this option?

15. A third option is for food businesses to provide a written notice asking people with allergies or intolerances or coeliac disease to notify staff before ordering food – for example, by inserting a notice into a menu or on a board

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. Are there any questions that come to mind when hearing this option?
 - ii. Do you think this option would provide any benefits? If so, what and why?
 - iii. Do you think this option would result in any challenges? If so, what and why?
- b. How **practical** would it be for the businesses you represent to implement?
- i. Why / why not?
- 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 option? What sort of businesses might be able to absorb these costs?
- f. What would be the impact, if any, on the sector if:
- i. This became a **mandatory requirement** for the sector? Why?
 - ii. This was **recommended as voluntary best practice** for the sector? Why?
- g. Overall, what do you think about this option?

16. 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?
 - i. Are there any questions that come to mind when hearing this option?
 - ii. Do you think this option would provide any benefits? If so, what and why?
 - iii. Do you think this option would result in any challenges? If so, what and why?
 - b. How **practical** would it be for the businesses you represent to implement?
 - i. Why / why not?
 - 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 option? What sort of businesses might be able to absorb these costs?
 - f. What would be the impact, if any, on the sector if:
 - i. This became a **mandatory requirement** for the sector? Why?
 - ii. This was **recommended as voluntary best practice** for the sector? Why?
 - g. Overall, what do you think about this option?

17. Finally, a fifth option is for food businesses to **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** (e.g. verbally or using stickers)
- a. What are your **first thoughts and impressions** when hearing this option?
 - i. Are there any questions that come to mind when hearing this option?
 - ii. Do you think this option would provide any benefits? If so, what and why?
 - iii. Do you think this option would result in any challenges? If so, what and why?
 - b. How **practical** would it be for the businesses you represent to implement?
 - i. Why / why not?
 - 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 option? What sort of businesses might be able to absorb these costs?
 - f. What would be the impact, if any, on the sector if:
 - i. This became a **mandatory requirement** for the sector? Why?
 - ii. This was **recommended as voluntary best practice** for the sector? Why?
 - g. Overall, what do you think about this option?

18. Of the five options we have just discussed, which is the most and which is the least acceptable to you? Why?

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** asking people with allergies or intolerances or coeliac disease to notify staff before ordering food
4. food businesses to **verbally ask all customers whether they have any food allergies or intolerances or coeliac disease**
5. food businesses to **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**

19. 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.