Food Standards Agency
Strategic Plan 2015-20

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INTRODUCTION
In 2014 the Board approved the strategy for the Food Standards Agency (FSA) for 2015-2020.¹ The strategy focuses on why we exist – our purpose and mission, and our big objectives.

In developing the strategy we reviewed a large amount of evidence and engaged with consumers, colleagues within the FSA, and a very wide range of stakeholders (academic and scientific, consumer organisations, industry representatives, local authorities, and other government departments (OGDs) and non-governmental organisations (NGOs) ), to identify the key themes that the FSA would use to inform its planning for the period 2015-2020.

A number of critical themes emerged that inform our strategic plan.

The most important relates to our unique role within government as set out in our founding legislation:

“The main objective of the FSA in carrying out its functions is to protect public health from risks which may arise in connection with the consumption of food (including risks caused by the way in which it is produced or supplied) and otherwise to protect the interests of consumers in relation to food.”

Focusing on this purpose, set for us by Parliament, and having considered the likely environmental factors that face the UK over the next strategy and beyond, the Board agreed to refresh and reinvigorate the FSA pledge:

“We will put consumers first in everything we do.

¹: http://www.food.gov.uk/sites/default/files/fsa141105a.pdf
We came to the conclusion that given challenges to food safety, authenticity, and food security we needed to consider “the interests of consumers” in the round, and after significant work with consumers and others we agreed a definition of consumer interests that will underpin our strategic plan.

Food is safe and what it says it is, and we have access to an affordable healthy diet, and can make informed choices about what we eat, now and in the future.

We identified that the FSA would concentrate its own efforts and resources on “food is safe and what it says it is” because those are the areas in which we are well placed to make the biggest contribution to consumer interests. We also said that we would explore whether we could use our science and evidence based approach and our credibility and independence to support consumers to consider the inter-relationship between their immediate and medium/longer term interests in relation to food in the context of innovation in the food system. We know there are growing challenges around safety, affordability, security and sustainability. We also know that some of the current and future innovations possible in food production will conflict with some people’s values. As a society we will need to be clear on the extent to which harnessing innovation will be necessary and acceptable in meeting those challenges. We believe the role of the FSA, where there are innovations which could deliver net consumer benefit across the range of consumers’ interests, is to help frame the public debate and to advocate for adoption of those technologies.

In consultation with consumers we identified three consumer rights to underpin our work:

- The right to be protected from unacceptable levels of risk.
- The right to make choices knowing the facts.
- The right to the best food future possible.
Consumers sometimes tell us that they feel powerless in their relationship with food. We want consumers to be and feel powerful – able to contribute effectively to shaping a food system that protects their interests and respects their rights. We have roles in protecting, informing and empowering consumers as part of helping them secure these rights. Section 7(2) of the Food Standards Act states that the Agency has the function of “ensuring that members of the public are kept adequately informed about and advised in respect of matters which the Agency considers significantly affect their capacity to make informed decisions about food”.

We also recognise that consumers have responsibilities as well as rights and we want to create an environment in which consumers are encouraged to be active players in creating the best food future possible.

We acknowledged that affordability, choice, food security and sustainability are issues where others have much greater ability to make a difference than we do. We do not want to spread ourselves too thinly, and by trying to do too much, achieve less for consumers. But we do want to contribute to the work that others do in these areas where we can to support the best outcomes for consumers.

We also acknowledge that when we take decisions or try to make a difference in our key areas of focus, we potentially affect other key aspects of consumers’ interests in relation to food. So we commit to think more carefully about all our own activities and assess each of them through the lenses of their impact on affordability, choice, nutritional quality, food security and sustainability.

Within our key areas of focus (“safe and what it says it is”) we need to be clear about our role and responsibilities and the roles and responsibilities of others.

It is the responsibility of people producing and supplying food to ensure it is safe and what it says it is … and the Food Standards Agency has a key leadership role in making sure they step up to that responsibility.

As well as rights, consumers also have responsibilities – contributions that only they can make to improving the food system and its impacts on them and their families. It is a responsibility of consumers to manage the risks relating to food that they can. They have a right to be informed and supported in taking on these responsibilities and we are committed to doing everything we can to help them do so.
The strategic outcomes, against which we will measure our impact, are aligned to the definition of consumer interests in relation to food, as set out in the strategy:

- Food is safe.
- Food is what it says it is.
- Consumers can make informed choices about what to eat.
- Consumers have access to an affordable healthy diet, now and in the future.

We will identify a series of indicators for each of the strategic outcomes, and we will monitor and report on these as part of our regular business and performance management cycle.

The FSA has a joint responsibility with others – including industry, consumers, and other areas of government – to improve these food related outcomes for consumers. The outcomes are co-produced and result from many factors; the FSA alone cannot achieve them. Only by everyone working together and playing their part will we be able to deliver food we can all trust. We will ensure we play our part and set ourselves targets for those factors which we can take responsibility for delivering.
THE STRATEGIC PLAN
The FSA Strategy 2015-20 identifies why we exist, what our purpose and mission is, and how that relates to the changing environment in which we operate.

The strategic plan identifies the major themes that will inform how we will set about building the organisation and its capabilities to achieve the purpose and objectives that are set out in the strategy.

In formulating our strategy, the Board recognised that the food system is going to come under increasing pressure over the next ten to twenty years, and that we cannot be sure at what pace changes will happen. So they agreed an approach to the plan for 2015-2020 that focuses on dealing with the challenges of today while seeking to build our readiness for the threats and opportunities of the future.
We will use science, evidence and information both to tackle the challenges of today, and to identify and contribute to addressing emerging risks for the future.

In our discussions with stakeholders they have reiterated the importance of us continuing to develop and apply a robust evidence base in our work to protect consumers’ interests. Sound evidence, openly published and well communicated is one of the foundations of trust. Our continued commitment to developing the evidence base provides a critical underpinning that enables consumers to access and understand the science behind decisions, and encourages industry to comply with our requests and advice because they know that they are rational in their basis.

We will gather and use evidence to identify and understand the biggest risks and challenges to consumers’ interests, so that we can make sure we focus our efforts on areas where we can make or cause others to make the biggest impacts.

We will develop our strategy and plan for science, evidence and information working closely with stakeholders.
We will use legislative and non-legislative tools highly effectively to protect consumer interests and deliver consumer benefits – influencing business behaviour in the interests of consumers.

In all our discussions about our strategy everyone we have spoken to – from the food industry as well as consumers and academics – has reiterated the need for a strong regulator, independent of the food industry and its advocates. People are aware of the resource pressures on local and central government and the need to find sustainably resourced ways of working that protect consumers for the long term in this context.

In ensuring that businesses step up to their responsibilities and consumers are supported and informed to meet theirs, the FSA has access to two main sets of tools. There are traditional regulatory tools such as making legislation and regulations and enforcing them; and there are communication based tools, such as providing greater transparency on business standards, which can incentivise rapid and more comprehensive improvement, and reward responsible businesses as well as better informing and empowering consumers.
Consumers deserve the protection of food law enforcement that delivers for them by matching resources to risk, and using and improving the effectiveness of the full range of enforcement tools. Our new Food Crime Unit will focus on tracking down and putting out of business those operators who are wilfully breaking the law and placing consumers at risk. In targeting enforcement resources we will give greater recognition to businesses who do the right thing for consumers and we will continue to concentrate on finding cost effective ways to support businesses to do so, building on the success of our “Safer Food, Better Business” pack for small businesses, for example.

We will use a “campaigning approach” to deliver benefits for consumers – by which we mean that we will focus clearly on what changes are in the interest of consumers and why; we will seek to persuade consumers and businesses to make those changes that will benefit consumers in the long run; we will align our resources to achieve them; and we will build coalitions with other organisations, parts of government, and opinion formers to deliver benefits to consumers.

We will follow the principles in the Regulatory Strategy, which were agreed by the Board in January 2015. These include:

- We will put consumers first in everything we do.
- We will seek to align incentives and disincentives for food businesses with the interests of consumers.
- Our focus will be on the outcomes we are seeking to achieve, keeping an open mind about the means by which those outcomes are achieved.
- Our future regulatory approach should be truly risk-based and assessed in terms of impacts.
- We will use our powers to deliver our strategic objectives – which go beyond our regulatory responsibility in respect of verifying compliance with food law.
- Government intervention (including legislation) is warranted where its benefits to the public are proportionate to the costs/disbenefits of its application.
- The costs to businesses of regulation should be no more than they need to be.
- It is not the FSA’s or local authorities’ role to achieve compliance – that is clearly defined in law as the responsibility of business.

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We will be genuinely open and engaging, finding ways to empower consumers both in our policy making and delivery, and in their relationship with the food industry.

At our foundation the FSA was in the vanguard of initiatives to improve openness and transparency and we have a heritage on which we can build, and need to build given changes in the expectations of society, and the environment we operate in.

We believe that consumers are able to engage with complex issues relating to their interests in relation to food if they are given the right support and opportunities to do so, and we will seek to give them those opportunities, share the insights that emerge, and encourage others to engage with consumers openly and make information accessible to them about the food system and how it works.

The right to make decisions knowing the facts requires much greater transparency in the food system. The information collected by industry about the food that people buy, and where and how it is produced, goes far beyond that which appears on labels and menus. The success of the Food Hygiene Rating Scheme shows it is possible to take a range of information, in this case about premises, plans and hygiene practices, and distil them into a simple index that is understood by consumers and allows them to make better informed decisions. We will drive an agenda of transparency in the food system, setting clear expectations about the information that industry and regulator should publish, and working with consumers to understand and articulate the issues that matter to them so that we and other interested parties can develop new tools and applications that help support consumers to take greater responsibility for the food decisions they make and their impacts.

We will find and trial new ways of engaging with consumers and other stakeholders at the very earliest stage so they help us form the questions and challenges that we want policy to address; new ways of engaging people throughout the policy making process not just during formal consultation; and ways of testing potential solutions with stakeholders – policy prototyping to help us refine policy solutions and optimise their delivery.
We will create an environment in which our people are highly capable, effectively supported, and consistently choose to make outstanding contributions to protecting, informing and empowering consumers.

Consumers and other stakeholders, including the food industry, have told us they want an FSA which is strong, appropriately resourced, and credible. As well as requiring us to work on sustainable models of funding, prioritisation, and the acquisition and application of evidence, this critically depends on our ability to attract and effectively deploy the best people.

As our approach becomes one which is about delivering impact from our expertise and influencing others we become more and more dependent on the quality, skills, motivation and alignment of our people. We believe that we are at our best when:

- We are trustworthy and professional.
- We are well managed and work with integrity.
- We are consumer focused and creative campaigners.
- We are flexible and resilient and hard working.
- We work really well together across the whole organisation and with others.
- We understand business and how to get them to do things.
- We focus on outcomes and the processes that support them.
- We are innovative.

Our people plan will focus on making sure we have the:

- Right people with
- The right skills, knowledge and behaviours, and
- The right engagement
- Supported by the right ways of working.

Over the course of the strategic plan period a measure of this will be how we move our people’s engagement and alignment with the FSA up to amongst the best in the civil service, achieving the high performing benchmark in the Civil Service People Survey.

We will consider the best ways of working for the future, enabling people to contribute from the locations and in the ways that suit them best and work across and beyond the organisation’s boundaries collaboratively.
We will develop an organisation that leverages great impact from small resources

Our strategy emphasises the importance of viewing the food system as a whole and empowering consumers by giving them information about that system and how well it is protecting their interests. This means that we need to think not only of how we monitor and report on our own performance and how we are doing in terms of delivering the outcomes we can control, but also to identify ways of reporting on the performance of the system as a whole, shining a spotlight on issues where consumers’ interests need to be safeguarded and identifying where there are failures or concerning trends.

We will seek to identify indicators which demonstrate where there are performance problems or vulnerabilities in the system as a whole, in terms of its capability to deliver against the broad definition of consumers’ interests. This will help us know where to focus our energy and influence to support change, and help consumers and others be empowered to demand change themselves.

Given the constraints on resource that face all parts of government, and the importance of us maximising the benefits to consumers that we cause to be delivered and minimising the costs, we will also place an even greater emphasis on the efficiency and effectiveness of our own work – including the policy processes that underpin our role as a Government department, our operational delivery activities, and the corporate resources that enable and support our work. We will develop a reporting framework and set of KPIs at a strategic level that enable our Board and stakeholders to understand how we are performing, and at an operational level which ensures that we are able to continuously improve the value for money of what we do.

Since our inception we have been a UK-wide body with representation in England, Wales, Northern Ireland and Scotland. However, from April 2015 Scotland will have a new food body and we will ensure we manage a smooth transition to the new arrangements and continue to work closely with Scotland to maintain consumer protection. We recognise the benefits for consumers from the FSA sharing skills and expertise across Northern Ireland, Wales and England, and believe that while each will have their own issues to deal with, in the context of a highly globalised food system, there is real benefit in us continuing to operate as a single entity. We will demonstrate this in the way we work. In consultation with the relevant stakeholders we will also produce specific plans covering the work of the FSA in Northern Ireland and Wales and consider the production of a plan for England.
Key activities for the FSA in the strategic plan period
The activities on the following pages describe some of the things we intend to do year by year to deliver progress towards our strategic outcomes and protect consumers’ interests in relation to food.

Between 2015 and 2020 we will take as many opportunities as we can to move in the direction outlined in our strategy. There are many specific actions we intend to take – some individually very small, some large and complex. Strategic coherence and maximum progress will be achieved by constantly focusing on the impact of everything we do, rather than by identifying a handful of large “initiatives” to focus on and imagining that the rest of our activities can carry on unaffected or be “deprioritised” and stopped – our work on allergies, chemicals, and incident management remains as important as ever, for example.

There will be some particularly significant programmes of work, however, which we believe will be critical in underpinning the successful implementation of the strategy. They overlap and have multiple impacts – for example the work on surveillance and horizon scanning identified under science and evidence is important to safe food and to our efforts to ensure that food is what it says it is. Major projects and programmes will sit within the FSA’s portfolio and provide monthly progress reports to the Portfolio Board. The Portfolio Board will ensure that the inter-dependencies within the portfolio are effectively managed.

The following represent the significant priority pieces of work in which we currently anticipate investing time, effort and resources over the next two to three years to move forward the delivery of the strategy. The food system is complex, with many different actors operating in it. No one can predict the future, and we cannot know with confidence what actions we will need to prioritise in the future. It is inevitable that over time the list will need to change. Therefore, as part of our business planning cycle, the Executive Team will review our work programme every quarter and the Board will review the priorities annually to make sure that our activities remain the most appropriate to deliver the greatest possible benefits for consumers and progress towards our strategic outcomes. Given this, the plan is more developed for the first two years, and later years will be fleshed out in future planning cycles.
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Consumers have the right to be protected from unacceptable levels of risk.

Campylobacter is the most common cause of human bacterial food poisoning in the UK. Each year it is estimated to be responsible for around 280,000 cases of food poisoning and at its worst, campylobacter can kill. We continue to analyse the impact of campylobacter, but the most recent FSA estimates suggest that the total impact on the UK economy could be about £900m per year. Up to 80% of cases can be attributed to raw poultry meat.

Listeria monocytogenes, which causes listeriosis, is the one of most lethal of all food pathogens. It has a high fatality rate among vulnerable groups (i.e. people with reduced immunity, pregnant women, unborn and newborn babies, people aged over 60 years and patients with specific underlying medical conditions), and causes the most deaths per population in vulnerable groups.

More information on our current Campylobacter Programme can be found at http://www.food.gov.uk/news-updates/campaigns/campylobacter/actnow

More information on our current Listeria Risk Management Programme can be found at http://www.food.gov.uk/science/microbiology/listeria
Year 1 – 2015/16
- Campylobacter campaign – ensure business delivers less than 10% of whole birds at end of production line with more than 1000 cfu/g.
- Develop and agree Listeria reduction plan.
- Begin work on relative measurements of risk and impact to enable us to compare and engage with consumers in comparing different forms of consumer detriment in relation to food.

Year 2 – 2016/17
- Campylobacter campaign – review progress and agree next steps.
- Implement Listeria reduction plan.

Year 3 and beyond – 2017 onwards
- Continue implementation of Listeria reduction plan.
- Conclude work on relative measurements of risk and impact and identify and take forward applications.
Consumers have the right to make informed decisions about their food and this is only possible when it is correctly and accurately identified, and appropriately labelled.

The work we did in developing our strategy reinforced our awareness of the risks to consumers associated with authenticity and with food fraud and crime, in which consumers are deliberately misled. We will continue to work with local authority, industry and other colleagues to identify areas of risk and agree actions to reduce them on behalf of consumers.
Year 1 – 2015/16

- Consolidate the newly established Food Crime Unit – establish effective measures for intelligence gathering, management and analysis, case building, collaboration with other agencies, and reporting mechanisms.
- Review our major cross-government Incident Management exercise, improving our capability to respond to a major incident.

Year 2 – 2016/17

- Food Crime Unit – assess the need and produce the Business Case for Phase 2 of the Elliott review proposals to enable ministers to decide on next steps to protect consumers.
- Review our surveillance and sampling deployment in the light of identified risks and incidents.
We will continue to develop, apply and openly communicate a robust evidence base in our work to protect consumers’ interests, as a critical underpinning to all we do.

We will build our science capabilities to ensure our use of science is:

- Focused on the biggest risks and challenges to consumers’ current and future interests, and how we can make the biggest impacts.

- Forward looking and innovative.

- Connected across programmes, disciplines and data to gain added value and new insights.

- Outward-looking to harness the power of working with and through others.

- Supported to develop our own skills, capabilities and engagement across the FSA and with the wider science community.
Year 1 – 2015/16
- Science, Evidence and Information Strategy delivery plan agreed by Board.
- Build and apply horizon scanning and emerging risks analytical capability.
- Convene a conference on the food system from the perspective of the strategy’s definition of “consumer interests” to engage with others and build partnerships and identify where there are concerns and “transparency gaps”.

Year 2 – 2016/17
- Continue to build and apply horizon scanning and emerging risks analytical capability.
- Define and agree our approach to targeted, effective surveillance.
- Define and bring on stream the main programmes of work on data and on new technologies, to be delivered through strategic science partnerships.
- Conclude systematic review of anti-microbial resistance risks in the food chain and identify, agree, and begin to implement any actions required to address any risks identified.
- Complete initial programme of work on behaviour change models to identify those that provide the most useful frameworks to help design interventions and identify measures to evaluate them.

Year 3 and beyond – 2017 onwards
- Use our assessment of behaviour change models, and robust evidence on consumer attitudes and practices, to frame, pilot and evaluate our approaches to effective interventions, including flexible or segmented approaches for different groups of people.
The FSA strategy identifies that consumers have rights and responsibilities with regard to the food that they eat.

We want to support them to ensure that their rights are respected and that they are able to take up their responsibilities and make informed decisions about the food that they eat, thus influencing the food system as well as their own well-being and that of their families and communities.

We are committed to both being open and engaging ourselves and also to encouraging industry to be transparent about the issues of importance to consumers, so that consumers can have power and influence based on a knowledge of what is happening in the food system.
Year 1 – 2015/16

- Establish new fora for effective consumer engagement – including an on-line panel that enables us to build a dialogue with a diverse group of consumers.
- Make better use of the information we and others hold on consumers and their views on food issues, so that we can target our information and advice more effectively, helping to deliver behaviour change where appropriate.
- Identify where information on consumers’ interests in food issues can be actively used to influence others to deliver consumer benefits.
- Press for Food Hygiene Rating Scheme (FHRS) mandatory display in England.

Year 2 – 2016/17

- Transparency campaign – in light of consumer research from Year 1, identify what food businesses ought to put into the public domain in order to empower consumers, and begin campaign to make it happen.
- Implement first stages of citizen science approach.
- Identify opportunities to work with others (e.g. NGOs, OGDs) to build new collaborations with schools, catering colleges and other educational settings to develop the skills and confidence of younger consumers to take decisions about the food they eat and influence other decision makers.
- Develop and then implement plans for how we will excel in public dialogue, participatory decision-making and effective consumer protection through:
  - being open to the views of consumers and others when framing questions;
  - engaging early and effectively in the process of identifying and assessing options for action; and
  - bringing together the appropriate range of tools and approaches to campaign for action and advocate on behalf of consumers.

Year 3 and beyond – 2017 onwards

- Review and evaluate the effectiveness of our consumer communications, building our understanding of how consumers get access to information on food and the food system.
Aligning incentives for businesses to ensure consumer interests are protected – implementing the regulatory strategy.

We will support the current delivery model where this is under stress, ensuring a focus on risk-based priorities. We will also seek ways to reduce the administrative and reporting burdens that we place on our delivery partners, while improving for the longer term the information and intelligence we gather, making sure that our regulatory functions do not repeat what is already being done effectively by others.

Our future regulatory role, including how delivery is funded in future, will be influenced by the new EU Regulation on Official Food and Feed Controls, so our work in Europe to re-negotiate this Regulation and then implement it will be important to underpin our future approach.
Year 1 – 2015/16
- Identify and implement improvements to the framework agreement, Codes of Practice and reporting mechanisms.
- Develop a suite of proportionate and deterrent sanctions, including work on sentencing guidelines, and developing and using more tools around reputational sanctions.
- Develop a framework to enable us to more rigorously assess ‘confidence in management’ in food businesses.
- Identify where there is more flexibility in food law, and determine how we could apply that for the benefit of consumers.
- Begin a broad based debate with local authorities, consumers, industry, and other key stakeholders about complementary or alternative delivery models including their sustainable funding – for meat and other food businesses.
- Continued negotiation in the EU on Official Food and Feed Controls.

Year 2 – 2016/17
- Develop food safety and authenticity criteria for public sector food and catering provision.
- Continued negotiation in the EU on Official Food and Feed Controls.

Year 3 and beyond – 2017 onwards
- Review how we work with partner agencies across the world on global food challenges.
- Continued negotiation in the EU on Official Food and Feed Controls.
- Work up and agree implementation plans for any changes to delivery and funding models identified in Year 2.
Given the scale of the challenges we have identified to the food system and the small amount of regulatory resource available to us to play our part in tackling those challenges, it is critical that as an organisation we excel at leveraging impact from small resources.

While being alert to value for money and cost effectiveness in everything we do, we will focus on two areas in particular – our people; and our IT and information management systems and capabilities.
Year 1 – 2015/16

- People engagement – implement action plan based on 2014 feedback and deliver further 3 point improvement.
- Design, working with people across the FSA, a Ways of Working programme to move towards civil service best practice by Year 3.
- Implement an organisation wide strategic learning and development plan including a management development programme for front line managers.
- IT infrastructure – continue to put in place a new IT infrastructure to improve efficiency, resilience, flexible working capability etc.
- Improve our Information Management, including mapping our business requirements for information, developing common data standards and baselining our information management model.

Year 2 – 2016/17

- Develop and deliver people engagement action plan based on 2015 feedback and achieve civil service best practice benchmark.
- Continue work on Ways of Working, learning and development and management development.
- Develop social media skills and presence across the whole FSA team.
- IT infrastructure in place to improve efficiency, resilience and flexible working capability.
- Extend the use of business intelligence tools.
- Continue our Information Management improvement by developing open data sharing across government.

Year 3 and beyond – 2017 onwards

- Conclude Ways of Working project.