
REGULATING OUR FUTURE PROGRAMME UPDATE

Report by Nina Purcell, Director of Regulatory Delivery and Wales

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1 SUMMARY

- 1.1 The Regulating our Future programme (RoF) is how we will build an effective, proportionate and robust system for ensuring businesses meet their responsibility to produce food that is safe and what it says it is.
- 1.2 This paper provides an update on activity across the programme since the last update to the Board in March 2017 (FSA 17/03/04), an overview of the high level plan for 2017-19 and a summary of the strategic risks.
- 1.3 The Board is asked to:
 - **Note:** the programme update
 - **Comment:** on the updated programme plan and stakeholder and engagement plans for 2017/18
 - **Consider:** whether this update provides assurance that the programme is making satisfactory progress in developing the new regulatory model

2 BACKGROUND

- 2.1 Regulating our Future, launched in February 2016, is a critical FSA strategic programme central to our ability to fulfill our statutory purpose as the Central Competent Authority for feed and food and meet the public's expectations in relation to food we can trust.
- 2.2 The programme's ambition is to develop and implement a new sustainable approach to regulation that leverages business behaviour changes to deliver consumer benefits. The programme will ensure a tailored and proportionate approach to regulation to ensure business compliance.
- 2.3 One of the compelling drivers for designing a new delivery model is the uncertain and rapidly changing world, in which we operate, and its consequences for food safety and standards. The new regulatory framework is being designed so that it is dynamic enough to keep pace with innovation in the food sector and harness new technologies, and be flexible enough to adapt to future circumstances, including a new relationship with the European Union.
- 2.4 The aim is to ensure the smooth delivery of a new regulatory model for food businesses in England, Wales and Northern Ireland by 2020, whilst implementing improvements in the meantime where possible and consistent with the aims of the programme.

3 INTRODUCTION

- 3.1 In March 2017 the Board received an update on the process for designing a new approach including the development of a Target Operating Model (TOM) through working collaboratively in the open with our stakeholders.
- 3.2 Since then we have been developing a more detailed plan for the overall programme and project initiation documents for each of the workstreams within the panel. The programme plan has been updated to reflect decisions taken by the Programme Board in respect of those elements of the model that are considered to be important and appropriate to deliver in time for the UK exiting the EU by April 2019 and to distinguish these from elements of the programme that will continue to be developed but will not be introduced into the model until after EU exit.
- 3.3 We have developed a 3rd iteration of the TOM (Annex 1), which reflects our evolving thinking within the workstreams developing the TOM and captures the enabling workstreams on data and sustainable funding that will be fundamental to the operation of the model and creating the dynamic that will make it function.
- 3.4 The programme has established mechanisms to regularly engage with colleagues leading on preparations for exiting the EU, to ensure that any changes we propose to the delivery model will enhance our role as Central Competent Authority for food and that the model will be capable of providing the confidence in our controls that we will be required to demonstrate to the EU and other countries. The governance for ROF programme and our EU Exit programme has been strengthened by establishing a new Programme Board that has responsibility for both of these organisational priorities. Membership of the Programme Board includes the Executive Management Team and the Chair of the Agency.
- 3.5 It has been necessary to revise the stakeholder engagement and insight activities that we had planned to deliver in May and June to ensure that we comply with the requirements of the Cabinet Office General Election Guidance 2017. Those events that were postponed, including a meeting of the Expert Advisory Groups and the series of LA Engagement events across England, Wales and Northern Ireland, have been rescheduled and will now be undertaken before the end of July.

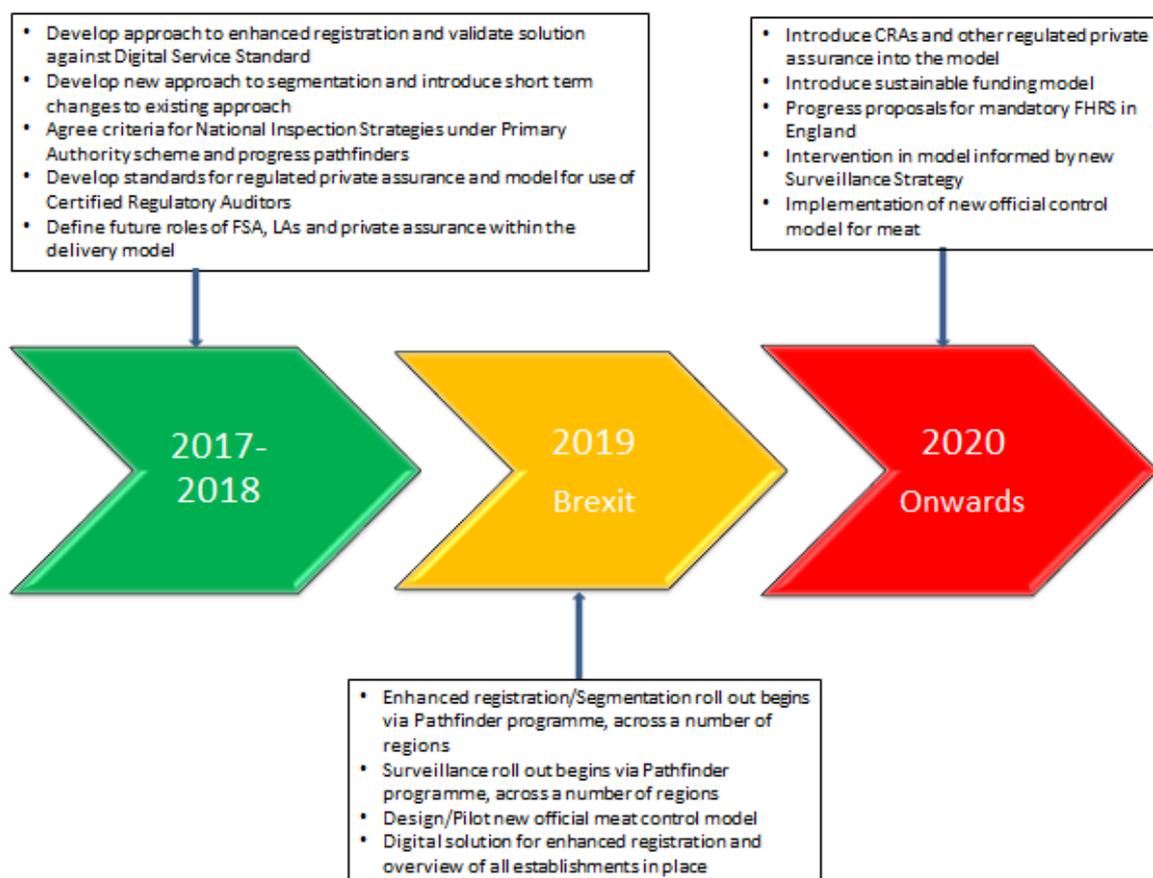
4 PROGRAMME UPDATE

Programme Priorities

- 4.1 In April the Programme Board considered the overarching ROF programme plan together with the organisational priorities for exiting the EU, in the context of the timeline for the latter, and agreed the elements where programme resources will be focused in the period to April 2019. Key considerations in this prioritisation exercise included resource requirements and availability,

dependencies across the programme, enhancing our ability to be and demonstrate that we are a modern and effective Central Competent Authority (CCA) and critical dependencies with the EU exit programme. With regard to those elements within the model that will require, legislative change or new legislation to bring them into operation we have taken into account that across government the priority must be on ensuring legislative inoperabilities within current legislation resulting from EU exit are remedied and therefore there will not be the time or space within the legislative programme to introduce new legislation prior to exit. The prioritisation shown below in Figure One indicates where programme resources will be focused, however, not all priority elements will be fully operational or introduced into the delivery model by April 2019. This is the position with Sustainable Funding where new national legislation will be required, which could not be put in place before EU exit and introduction of the Certified Regulatory Auditor concept, which is complex in nature and will involve accreditation and certification processes to have been agreed and implemented. This is also the case with regard to progressing proposals for mandatory display of FHRS in England, which will require primary legislation and will be dependent on the arrangements for Certified Regulatory Auditors being in place.

Figure One: Programme Overall Lifespan Timeline : Key Deliverables



Enhanced registration and segmentation have been prioritised as they will be fundamental in enabling the TOM to be implemented, particularly with regard to assurance within which there will be more options for business than in the present one size fits all approach. Furthermore, developing and implementing new arrangements for business registration and the data flowing from that, through which the FSA will have access to details of all food business establishments, will strengthen our ability to be an effective Central Competent Authority and to demonstrate this in a post EU exit environment.

Describing the future role of the FSA, LAs and the private sector within the new operating model will be fundamental to securing support from stakeholders, including consumers, for the model and their on-going contribution to its development. Whilst it is not possible at this stage to be definitive about the roles of all organisations within the model, we are now clearer on the nature of the future role of local authorities and we will be communicating and exploring this in the LA engagement events in June and July.

Target Operating Model (TOM)

Enhanced Registration

- 4.2 Ensuring food businesses are the best they can be from the day they start operating has been identified as one of the four key workstreams in the development of the new TOM. The approach being adopted to deliver this outcome is pragmatic and progressive recognising that we do not yet have the evidence base to support the case for legislation to require businesses to demonstrate that they meet certain standards before beginning to trade. However, when the enhanced approach to registration has been embedded within the delivery model, the success of that will be evaluated to determine if it is appropriate to propose legislation requiring a permit to trade.

The ability for new businesses to have easy access to good quality, credible and current information and advice to help them on start-up was identified as an area for improvement by the Expert Advisory Groups. They reported that whilst there is a plethora of advice which has been produced by many different organisations, it is not easily accessed by the uninformed looking to set up a new food business. There is therefore a role for the FSA as the Central Competent Authority for food safety to provide a central point for accessing this information, including appropriate signposting to information produced by other organisations/ bodies e.g. Trade Associations.

The Agency has a project underway to develop a new website for the organisation and an opportunity has been identified to address the above requirement through this project. The requirement has been included within the website development project and is being taken forward as a priority. To inform development a working group, including representatives from business and regulators, has been set up.

Progress of this workstream has been slower than anticipated due to resourcing difficulties that have now been addressed.

Segmentation

- 4.3 The objectives, project deliverables and project plan for this workstream have been identified and agreed and business activity mapping of the current and future approaches to segmentation has been completed. In order to inform development of proposals for new approaches to segmentation and risk assessment of food businesses, to determine the frequency and nature of planned interventions, we are gathering evidence through research on international approaches to these activities. This approach will enable us to refine our thinking on the new approach and to increase the pace at which changes can be made within the delivery model by learning lessons from the experiences of other CCAs and evaluations of their approaches.
- 4.4 The workstream aims to modernise the approach to segmentation and will focus on:
- Delivering a new methodology that at first point of contact with the regulatory regime segments food establishments based on a range of risk indicators concerning the establishment's food activities. The approach will draw on a range of available data thereby moving away from a "one size fits all" approach and enabling regulatory resource to be focused on the areas critical to ensuring compliance with food law and protecting consumers.
 - Evolving the current establishment based approach to risk assessment that takes place after an official control inspection or audit to consider all available compliance information when setting a single planned intervention frequency for both food hygiene and food standards controls.
- 4.4 Whilst developing a new modernised approach to segmentation will take some time to develop and put into practice we intend to operationalise some of the concepts by making changes as soon as possible to the risk assessment approach currently implemented by local authorities (LAs). We plan to introduce enhancements that will result in LAs targeting resources towards establishments that repeatedly fail to meet and sustain compliance with food law requirements by reducing the focus on those that consistently demonstrate that they do. Changes will also be introduced to give recognition to the increased control that Primary Authorities provide through assuring food safety management systems delivered across multi-site food businesses. Detailed proposals will begin development in July 2017 and we have formed two working groups with representation from LAs, the food industry and independent experts to provide critical review of the deliverables within the workstream. These changes will be implemented through changes to the Food Law Code of Practice and the proposals will be subject to public consultation before implementation.

Assurance and Standards

- 4.5 Developing and implementing robust, credible and deliverable arrangements for assurance within the TOM will be critical to the acceptability and recognition of our future regulatory delivery model. Therefore, in developing our proposals for assurance we are doing so having regard to national and international developments in this area.

In January 2017 the Cabinet Office published the report of the Regulatory Futures Review¹ to which the Agency was a key contributor. The review focused on the following key themes:

- the future of regulation;
- regulated self-assurance and earned recognition;
- charging for regulation;
- collaboration between regulators; and
- burdens on regulators.

The report makes recommendations in each of these areas and we are taking these into consideration within the programme, particularly in developing our proposals for regulated private assurance and sustainable funding of the new delivery model. We have agreed to participate in Cabinet Office initiatives to progress the recommendations in the report and are contributing to a Health and Safety Executive chaired review focusing on collaborative use of data for assurance.

- 4.6 At EU level we have been engaging with other European countries as part of the Heads of Agencies Group. Work in this area includes developing guidance on the use of private assurance schemes to encourage harmonisation and common understanding. We have had constructive discussions to learn and share with the Danish Food and Veterinary Administration about their new approach to multi-outlet businesses and our work with Primary Authorities.
- 4.7 At international level, where our contribution and influence will be more important following EU exit, we have been working with Canadian counterparts to draft a discussion document for new Codex Alimentarius Commission (Codex) work to develop guidance on regulatory approaches to 3rd party certification. This has been supported by others including the EU and United States. These proposals were considered by CCFICS (Codex Committee on Food Import and Export Certification and Inspection Systems) at its session in May². CCFICS has agreed to a new work proposal in which FSA will take the global lead on the development of international guidelines for the use of voluntary 3rd party assurance schemes by Competent

¹ <https://www.gov.uk/government/publications/regulatory-futures-review>

² http://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FMeetings%252FCX-733-23%252FWD%252Ffc23_08e.pdf

Authorities. Canada and Mexico will be assisting as co-chairs. This CCFICS recommendation will be considered by Codex in July.

- 4.8 Work has been progressed to draw out and map the key assurance activities that will be required in the first tier of assurance of the TOM, within which official control and regulated private verification of food businesses controls will take place. This activity mapping has facilitated the identification of specific development workstreams which will now be developed in detail, prioritised and resourced accordingly.
- 4.9 With regard to the gathering and effective use of regulatory assurance data flowing from activity in the first tier of assurance we have been engaging with other key regulators, across a diverse range of sectors to explore the opportunities for the pooling of regulatory data for mutual benefit and efficiency across the regulatory landscape of those participating. This engagement with the Health and Safety Executive, Defra, BEIS and other government departments, has revealed case studies demonstrating the synergistic effect of data sharing between regulatory bodies and how this can increase the effectiveness of regulatory activity, whilst at the same time reducing the burdens on regulators and businesses.
- 4.10 For the second tier of assurance in the TOM, where the FSA will exert control over the multiple sources of assurance in the first tier and discharge its role as Central Competent Authority (CCA) for food safety, we have developed a draft description of the key activities of the CCA. This will be explored on a cross-agency basis to ensure that all CCA roles, including those anticipated for the FSA following EU exit have been captured. When completed this work will provide an insight into the structure and capability that will be required within the department to deliver an effective and sustainable second tier of assurance.
- 4.11 The Primary Authority National Inspection Strategy (NIS) feasibility study is progressing towards its final stages. Primary Authorities and their business partners have tested the draft criteria and completed a gap analysis. We have reviewed these and provided feedback to the partnerships and are currently evaluating the feasibility study and will report findings by the end of June 2017.

The next step in this initiative is to move to pathfinding in which we will test NIS in the real world. Eight Primary Authorities and their businesses took part in the feasibility study and we anticipate between 4 to 6 partnerships will move to the pathfinder phase. The Primary Authorities are drafting outline National Inspection Strategies. Two partnerships have submitted their draft NIS proposals and we expect to have received all by end of June. We are carrying out work internally to test the criteria and we plan to test the criteria with stakeholders between June and September, including at events with LAs and industry. This will contribute towards establishing a final set of NIS criteria. The pathfinder phase is planned from July to December 2017, during which the partnerships will test their NIS proposals in England. Given the increase in central oversight of participating businesses resulting in a reduction in local

inspections we are considering how a Food Hygiene Rating Scheme that is credible and sustainable can be maintained.

- 4.12 The pilot project to consider the potential contribution that evidence from the BRC 3rd party assurance scheme could make to the regulatory delivery model has been completed and the project report will be published in July. The findings indicate that the information provided in BRC Global Standards audit reports would provide useful background for Competent Authority officers to plan and direct their official control interventions. These audits could not replace Competent Authority official controls due to legislative restrictions and differences in scope and emphasis between BRC audits and LA interventions, however, they could be taken into account in determining the frequency, scope and nature of official controls. Such an approach would provide more comprehensive assurance that businesses within the scheme are complying with food safety requirements, make better use of industry data, reduce the regulatory burden on businesses and release LA resources to address non-compliant businesses. These findings will be taken into consideration in developing a new risk-based approach to intervention within the Segmentation workstream.
- 4.13 We are in the process of developing further feasibility studies, in accordance with our governance procedures for such activities, with organisations that have submitted outline proposals for consideration. These include proposals in relation to a digital due diligence system, digital provision of business monitoring data and an outline Assured Catering Scheme.

The outline Assured Catering Scheme, which has been developed by the British Hospitality Association (BHA) in partnership with the Chartered Institute of Environmental Health (CIEH), is of particular interest to the programme as there are currently no recognised assurance schemes in place within the catering sector, which accounts for approximately 70% of food establishments in the UK. A hot house event was held with on 13 June with companies that provide private assurance to the catering industry, BHA and CIEH to explore how the outline scheme could be developed and work in practice. In addition to exploring this scheme the event provided an opportunity to inform development of our Certified Regulatory Auditor concept and the synergy of this with the proposed Assured Catering Scheme.

Enabling workstreams

Data and Digital Technology

- 4.14 The Data work stream has a strategic support and enabling role for the RoF programme and the availability and access to data, data standards and their exploitation will be critical to implementation of the TOM. Not only is data a critical resource for the FSA in its current operations but more effective use of data will help enable us to deliver more efficient, effective government and public services that are responsive to businesses and citizen's needs. Data is therefore a foundation for the FSA, its operations and the outcomes it will achieve in its roles as a regulator and Central Competent Authority.

The Data work stream is focused on 3 principle areas: Understanding our Users; Understanding our Data; and Investigating Innovative Opportunities. To create an effective service, we must understand our users' end-to-end journey and the ways they interact with our service. The better we understand our users, the more likely we are to design and build a service that works well for them. In order to enable the TOM, we need to know what data is required, the standards that need to apply to that data, the security required and how it is accessed. The workstream also supports, facilitates and coordinates activities that look to innovate with data in a way that further the RoF principles. A framework has been developed for gathering this information so that each TOM workstream focuses on data requirements in a consistent manner.

Alongside this the Data workstream is providing business analysis services to the TOM workstreams, helping to understand and analyse user and business needs. This will help develop key products that will support the outcomes for the respective workstreams, whilst ensuring they provide the information in a consistent format and structure across all elements of the programme.

As the programme matures, we are developing our approach to establishing a digital service. The initial focus of any service is to ensure that we have a current, comprehensive view of all FBOs in England, Wales & Northern Ireland, in sufficient detail to be able to categorise and determine appropriate assurance regimes. Working with colleagues in FSA Digital and FSA Procurement we have defined our commercial approach and requirements, secured additional funding, and have launched a procurement exercise. Upon completion we will undertake a robust Discovery phase. The Discovery phase will inform and help define the design of registration and segmentation and identify digital solutions to support realisation of those objectives. Discovery will comprise of extensive, systematic research with stakeholders to create a portfolio of user stories. This research and analysis will provide a robust, comprehensive and compelling evidence base to help us achieve support from Government Digital Service and ultimately Cabinet Office spend approval, which will be required before we can proceed to development and will also be of use for other audiences.

Sustainable Funding

- 4.15 Initial work has been undertaken to establish the baseline for the economic case including the value of the food sector, the cost of the current regulatory delivery model and identifying who bears the cost within the model. Research and analysis is underway to gain an understanding of approaches to charging for other regulatory activities in the UK and international approaches to charging to inform development of options for sustainable funding of the TOM.

The additional resources required to take forward this workstream have been identified and we are in the process of obtaining the required skills and capacity.

Stakeholder engagement plan 2017/18

- 4.16 A series of in depth engagements with LAs will start in mid-June and run through to mid-July. These were originally signalled as opportunities to update LAs on the programme and developments over the last year. However, the events have been developed along the lines of earlier Hot Houses and will be more interactive and participative to get the best ideas, challenge and buy-in from LA partners. In order to gain an insight into the views of LA partners on developments within the programme members of the FSA Board have been invited and agreed to attend the LA events and also to observe discussions at the forthcoming meeting of the Expert Advisory Groups on 3 July.

More TOM focused LA engagement will be developed to build on this series of events with LAs. Workshops to develop, challenge and create approaches to aspects of the TOM will be designed and delivered to ensure we build advocates and support for the new regulatory framework.

As workstream plans are developed and pathfinder activity begins to take shape, stakeholder engagement will be tailored around specific parts of the TOM, e.g. the tailored event discussed in 4.8 above with assurance and audit businesses. Plans for a Regulator Hot House are being developed to enable the FSA and other regulators to learn from each other, share good practice and avoid common pitfalls. There will also be a focus on the existing mechanisms used by OGDs i.e. BEIS stakeholder Expert Groups to gain buy-in across a wider spectrum of the industry stakeholder landscape.

Micro and SME businesses have been recognised as important parts of the stakeholder landscape and we are aware of the limitations they have to access different routes of assurance. To build understanding and insight into micro and small business operations we are working with a number of gateway trade³ organisations to hear directly from this business sector. Various methodologies are being used to capture this insight. Short surveys, discussion and focus groups, agenda items at conferences and one to one discussions have taken place to understand where and how regulation fits into the business models for this sector.

The insight from this activity will form part of the agenda for a stakeholder event to be held after the summer to inform and engage stakeholders on the next iteration of the Target Operating Model. This event will bring together SME/Micro gateway organisations that have been part of the insight work, BEIS Expert Groups representing a wide range of trade association and

³ Association of Convenience Stores (ACS), Nationwide Caterers Association (NCASS), The Provision Trade Federation (PTF), The Specialist Cheesemakers Association (SCA), Asian Catering Federation (ACF)

member organisations, FBOs and professions supporting them with new technology.

Updated Programme Plan 2017-18

- 4.17 Annex 2 sets out the revised programme plan for the 2017/18 financial year. It reflects the priorities from RoF timeline presented earlier in figure 1, with key deliverables identified over the next financial year in preparation for EU exit. The plan is very much a living management tool, designed to provide sufficient detail to support activity such as corporate planning and engagement, whilst designed to be refined and revised over time. This will enable us to respond to a dynamic wider environment, such as arrangements for exiting the EU.

5 LEGAL/RESOURCE/RISK/SUSTAINABILITY IMPLICATIONS

Resources

- 5.1 We have continued to build capability and capacity across the programme, through a planned mixture of internal transfers, external recruitment, targeted 3rd party support and training. We have identified that current experience of the operation of the current delivery model is critical to development of the TOM and to support the programme we are recruiting secondees from local authorities to work on the enhanced registration and segmentation workstreams.

Updated Risk Management Approach

- 5.2 Annex 3 sets out the revised approach to Risk Management within the programme. The new approach will allow the capture of a greater granularity of detail within workstreams with review of strategic risks by the Programme Executive while also enhancing links with the FSA Corporate Risk Register and the Audit and Risk Assurance Committee (ARAC) forum.

Risks to the successful implementation of the programme are managed through a mature risk management process. On a two-weekly cycle, workstream leads work with the dedicated risk management colleagues to formally review risks. The revised Risk Register is reviewed on a monthly basis by the Programme Board. In addition, the Programme, in recognition of the strategic significance, reports to the ARAC.

6 DEVOLUTION IMPLICATIONS

- 6.1 In progressing development of a new operating model we are taking into consideration the need for flexibility in any new arrangements to enable the model to meet the needs of individual countries, whilst delivering an overall regime that meets the principles that support the programme. We are ensuring that there are opportunities for engagement with the programme across the three countries and this is reflected in the forthcoming LA

engagement events that will take place in England, Wales and Northern Ireland.

In Wales, Welsh Government is in the process of setting up a working group with representation from FSA and Directors of Public Protection Wales to provide a regular opportunity for engagement and collaboration on developments within the programme and to ensure that the outcomes proposed are in line with the Welsh Government Position Statement in Response to Proposals within the Food Standards Agency's Regulating our Future Programme of Work.

Across the programme at all levels we continue to work closely with colleagues in Food Standards Scotland (FSS). Colleagues from FSS have been integrated into the revised governance arrangements at both Programme Board and Programme Executive levels and this arrangement has been reciprocated with FSA representation on FSS's Regulatory Strategy Programme Board. Where appropriate we are seeking to ensure harmonisation of outcomes across both programmes to protect the interests of all UK consumers and minimise burdens on businesses that operate across the UK.

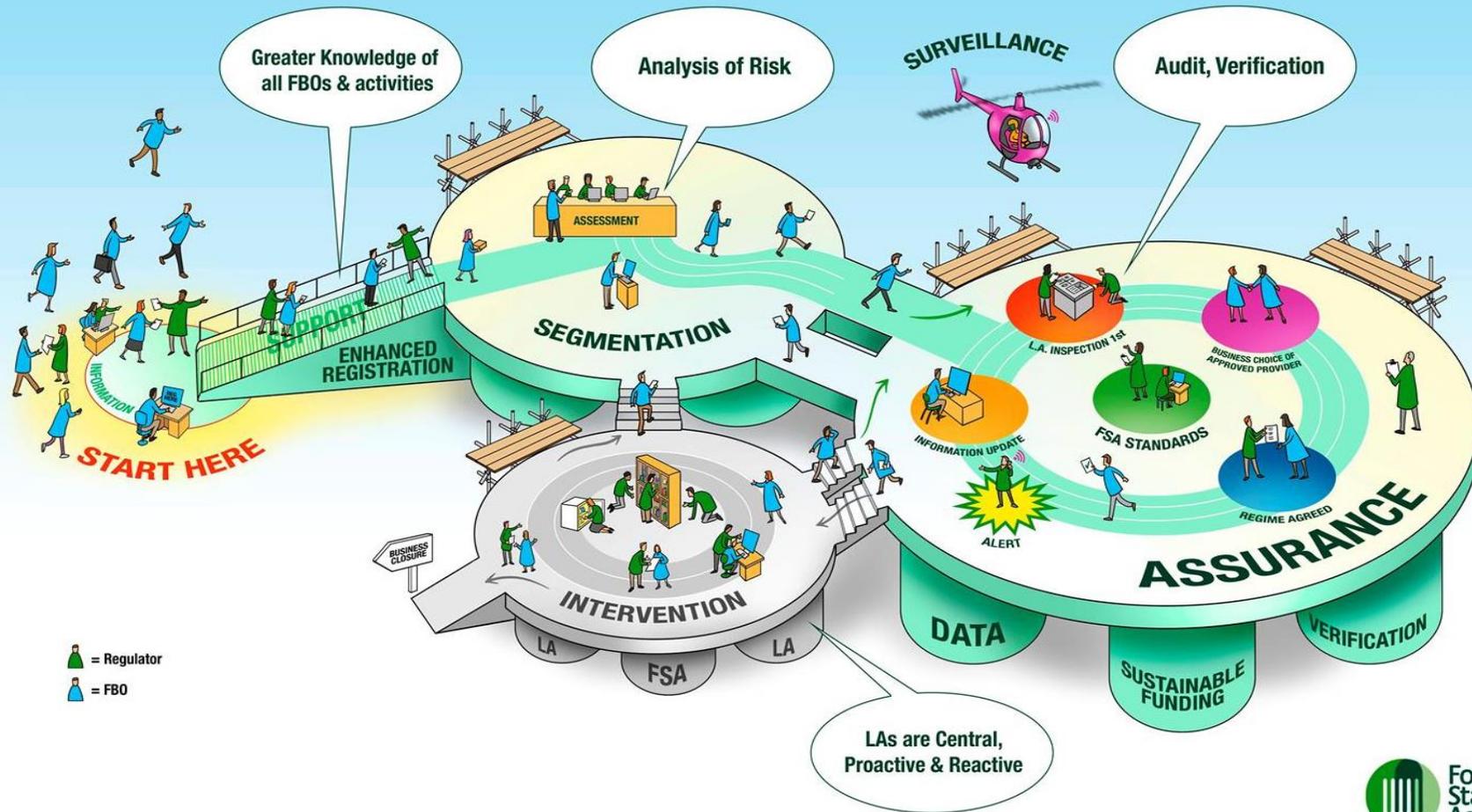
7 CONCLUSION AND RECOMMENDATIONS

7.1 The Board is asked to:

- **Note:** the programme update
- **Comment:** on the updated programme plan and stakeholder and engagement plans for 2017/18
- **Consider:** whether this update provides assurance that the programme is making satisfactory progress in developing the new regulatory model

Annex 1 Latest Iteration of Target Operating Model

Target Operating Model 2017 - 2018



Annex 2 Updated Programme Plan

Stream		Q1 FY17-18	Q2 FY17-18	Q3 FY17-18	Q4 FY17-18
Develop Digital Service	Registration	<p>PRE-DISCOVERY</p> <ul style="list-style-type: none"> Project Initiation Document Roles & requirements definition 	<p>DISCOVERY</p> <ul style="list-style-type: none"> Discovery activity to understand all stakeholders needs Understand constraints (budgetary, resourcing, legal / regulatory, technical, operational, etc.) on the emerging solution Understand current capabilities that may be leveraged Define service – based on user needs Map necessary Guidance materials Run focus groups 	<p>DISCOVERY & ALPHA</p> <ul style="list-style-type: none"> Prototype mock-ups of process Agree Minimum Viable Service / Product to carry into pilot phase Refine technical and operational solution and high level delivery plan Refine Data requirements Refine technical and operational solution and high level delivery plan 	<p>ALPHA</p> <ul style="list-style-type: none"> Deliver MVP and pilot / test for three months in two regions Deliver Guidance materials (identify partners to deliver) Prepare for Beta e.g. Develop approach to pathfinder across a number of region; alignment with Digital Service Standard Enhanced set of data becoming available
	Segmentation	<ul style="list-style-type: none"> Project Initiation Document Establish working groups to assist risk categorisation 	<ul style="list-style-type: none"> Review existing Local Authority process Review current approaches/capabilities across central Government Validate pilot candidates Define solution constraints (e.g. budgetary, resourcing, legal / regulatory, technical, operational) Research/insight projects Identify/implement any „quick wins“ 	<ul style="list-style-type: none"> Complete Discovery. Overlay further customer insight Develop / validate guidelines for risk engine Iteratively develop detailed Segmentation framework Refine Data requirements Refine technical and operational solution and high level delivery plan 	<ul style="list-style-type: none"> Refine approach Prepare for Beta Document Segmentation metrics (categorisation) Develop Appeals process Validate solution against Digital Service Standard (or equivalent) Model impact on Local Authorities
	Technology, Data and Commercial	<ul style="list-style-type: none"> Data landscape documented, gap analysis complete External data source & interfaces documented Approach to Customer Personas developed Initial data strategy agreed Secure additional funding Define commercial approach Supplier evaluation; Contract let GDS engagement Recruit additional Digital resource 	<ul style="list-style-type: none"> Technology strategy developed e.g. Platform & infrastructure strategy; API (Service) strategy; Application strategy Customer Personas developed Map User Journeys Legacy data collection plan developed Data collection methodology developed Data architecture 	<ul style="list-style-type: none"> Customer Personas developed Map User Journeys Technology architecture developed: Platform and infrastructure architecture; API (Service) architecture; Application architecture Guidelines established for tools, frameworks, version control, coding standards etc. 	<ul style="list-style-type: none"> Technical architecture delivery & refinement of approaches
Assurance	<p>In parallel, develop a suite of products and policies. Scheduling being confirmed.</p> <ul style="list-style-type: none"> CCA standard for private assurance schemes CCA standard for (and promote development of) industry guides (spec for business compliance) Sectoral template food safety management systems Standardised evaluation and verification reporting Competence specifications Standard for CRE/CRV employers Evaluation/certification of CRE/CRV Transition rules Guidance on CA use of regulated private assurance Standard procedures for on site evaluation and verification of food business controls 				
Sustainable Funding & Business Case	<ul style="list-style-type: none"> Establish baseline for economic case Research / analysis of UK and international approaches to charging to inform development of options Onboard specialist resource 	<ul style="list-style-type: none"> Iterative development of options to transfer cost (e.g. charge for what services; type of financial instrument used); Modelling of impact of funding scenarios on sub-sectors (e.g. Impact on LA, FSA, SMEs); Development of Business Case 	<ul style="list-style-type: none"> Iterative development of options to transfer cost (e.g. charge for what services; type of financial instrument used); Modelling of impact of funding scenarios on sub-sectors (e.g. Impact on LA, FSA, SMEs); Refinement of Business Case 	<ul style="list-style-type: none"> Iterative development of options to transfer cost (e.g. charge for what services; type of financial instrument used); Modelling of impact of funding scenarios; Business Case complete 	
Communications & Engagement	<ul style="list-style-type: none"> Implement Stakeholder Management System Whitepaper Define/plan LA engagement Engagement: LA; EAG; SME/Big Business focus groups 	<ul style="list-style-type: none"> Engagement: LA; EAG; SME/Big Business focus groups 	<ul style="list-style-type: none"> Engagement: LA; EAG; SME/Big Business focus groups 	<ul style="list-style-type: none"> Engagement: LA; EAG; SME/Big Business focus groups 	
Organisational Design	<ul style="list-style-type: none"> Project Initiation Document. Ensure alignment with FSA HR work plan 	<ul style="list-style-type: none"> Detailed analysis. Develop proposed approach 	<ul style="list-style-type: none"> Iterative development of proposed solution Early influence of business planning for 2018/19 	<ul style="list-style-type: none"> Iterative development of proposed solution Outline deployment plan for late 2018/19+ 	

Annex 3 Updated Risk Management Approach

