

KANTAR PUBLIC



FSA Synthesis Report: Bringing together common insights from the 'Efficacy of Recalls', 'Regulating our Future', and 'Transparency' Research Reports

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Executive Summary

The Food Standards Agency (FSA) is an independent Government department set up to protect the public's health and consumer interests in relation to food. To support this, each year the FSA commissions numerous consumer and business facing research projects to better understand stakeholder needs.

The FSA commissioned Kantar Public to summarise common findings across three recent projects, in order to identify cross-cutting, emerging trends. The three projects were:

- Efficacy of Recalls (2017): a mixed method project combining a quantitative survey, stakeholder interviews and workshops engaging consumers, food business operators (FBOs) and other stakeholders (Local Authorities [LAs], FSA staff) to understand how food recalls and withdrawals are managed;
- Regulating our Future (2016): a qualitative project engaging consumers and small FBOs to understand reactions to principles intended to inform the design of future regulations and potential ways in which these principles could be enacted; and
- Transparency: understanding public views and priorities (2017): a qualitative project engaging consumers to understand what being transparent about food means to them, whether transparency is important, and how transparency could be supported.

Key findings

Consumers and food business operators' engagement with food issues

Consumers and food business operators (FBOs) typically do not look beyond their immediate contexts and needs when it comes to food issues. For the most part, consumers do not actively seek out information about food issues unless they have an identified need for the information (allergy, cultural, lifestyle) and have an ability to act on that information (self-efficacy). Consumers' general confidence in the UK food system, which they view as one of the safest in the world, builds a sense of complacency. As a general rule, consumers do not proactively seek information about food issues because they trust that UK food is safe. Although, upon learning their presumptions are inaccurate, consumers claim they want access to additional information about food, to a substantial degree they expect to be able to take the efficacy of the UK food system for granted.

FBOs are typically highly invested in ensuring that the food they sell is what it says it is and is safe to eat. This is not only because FBOs recognise that they are responsible for the health and safety of their customers, but also due to commercial interests and organisational pride.

FBOs have typically established a range of systems and processes to meet their responsibilities to customers. However, their abilities to dispose of the full range of their responsibilities are affected by their

size and their available resources, with large food businesses customarily deploying more complex and formalised systems than small food businesses. Regardless of size, FBOs are generally confident that their systems and processes are effective. This confidence is not based on data. FBOs do not appear to audit or evaluate the efficacy of their internal systems and instead just trust that they are working.

Trust in UK food systems

Consumers and FBOs have high levels of trust in the UK food system as a whole. Consumers think UK food standards are among the highest in the world and are rigorously enforced. FBOs think they have established systems which effectively protect the public and believe commercial interests will mean their suppliers do the same. Although both groups are aware that things can and do go wrong, such instances are felt to be rare.

Although trust is high, it is also fragile and not experienced uniformly by consumers or FBOs. Consumers' general engagement with information about food and food issues (production methods, supply chains, nutritional content, etc.) is relatively low. Consumers' confidence in the UK food system is based on anecdotal impressions rather than a detailed knowledge of how the UK food system works in practice. Consumers' trust in the food system as a whole weakens when they learn their presumptions are inaccurate.

Consumers do not trust all stakeholders in the UK food system equally. Public bodies are perceived to be more trustworthy than food businesses as they are mandated to prioritise the public good. In contrast, FBOs are believed to be profit driven and, as such, liable to cut corners or describe products in a way that will increase sales. Although consumers feel small local food businesses are more accountable than remote large business, in general they feel FBOs cannot always be trusted to act in the public's interest.

Communication needs

Although most consumers do not actively seek out information about food, consumers feel being able to access information is important. This is particularly the case for those with specific information needs, such as people with allergies.

When communicating about food, FBOs, regulators and others should balance consumers' need for convenience and speed with a need to be accurate, honest and transparency.¹ Consumers consider themselves to be time poor and like things that make it easy for them to quickly judge if a product or venue is suitable. Consumers want to be provided with information at appropriate points in time and through appropriate channels. Generally this means giving consumers information at the point of purchase or on food packaging. Consumers like shortcuts, heuristics and visual symbols (such as traffic lights and standardised formats) and consider long text descriptions (particularly if including technical language) difficult to engage with.

However, although consumers may prefer quick and visual means of communicating about food, such mechanisms do not always reflect the complexity of issues. Our findings suggest that consumers hold a number of inaccurate beliefs about the UK food system and the meaning of certain terms, symbols and signs. Although consumers themselves think that they are 'savvy' and able to read the lines when it comes to

¹ The relationship between transparency and honesty is nuanced with distinctions driven by the consumer. To be honest, the information being provided has to be factually true. To be transparent, the information has to be both true and detailed enough for consumers to understand the meaning or implications of the information.

product marketing, they are sometimes 'misled'. For instance, consumers were surprised to learn that products sold as 'Made in Britain' contained 'core' ingredients from outside of the UK. Feeling misled erodes consumers' trust in specific brands and a food system that allows them to be manipulated.

The future role of the FSA

The three projects in this synthesis considered different potential changes to how food businesses are regulated. For the most part, FBOs and consumers welcomed these proposed changes if they would increase consumer safety and target businesses that represent the greatest risk. FBOs emphasised that the financial cost of changes to food businesses should be kept to a minimum.

Consumers consistently felt that the FSA could take on a more prominent and visible role when regulating food businesses. Across all three projects, most consumers were unaware of the FSA or its remit. This lack of awareness acted as a barrier to consumers engaging in the UK food system and accessing valuable resources, such as allergy alerts.

Behind the scenes there may also be opportunities for the FSA to work with FBOs to support them in keeping consumers safe. The realities of modern life mean that many consumers lack the time to find out information about food issues. Many are also not interested in doing so as they do not perceive a need for this information. In light of this the FSA may wish to extend the work it already does with food businesses to help them communicate effectively with consumers. For instance, the FSA could provide standardised templates to businesses to help them manage food recalls. The FSA might also consider supporting communication and transparency between businesses to help them understand partners' compliance with processes, such as recalls.

1. Document background and aims

1.1 Background

Each year the FSA commissions a large number of research projects to better understand UK food businesses and consumers. These projects are typically designed to answer specific research questions and build clear recommendations the FSA can take forward when engaging with consumers, businesses and legislators.

The FSA's research projects are robust and intended to reflect the multiplicity of consumer and food business operators' (FBOs) experiences in the UK. The FSA works to ensure that sample frames are developed to capture an appropriate range of UK consumers and food businesses, depending on the research topic. The FSA also uses a variety of quantitative and qualitative research techniques to ensure insights reflect not only what consumers and businesses are doing, but also what is driving their behaviour.

Crucially, the FSA's research projects are both strategic and iterative. Each project builds on insights gleaned in previous research while trying to address new questions or solve new problems.

1.2 Aims

The FSA takes a targeted, topic specific approach to commissioning research. While getting an in-depth understanding of specific issues has a clear value, looking at food issues in isolation does come with risks. The most prominent of these risks is missing significant recurring themes that emerge across otherwise unconnected projects.

This document aims to bridge this gap by looking across three of the FSA's recent projects and identifying cross-cutting themes that are important to consumers and food businesses. Identifying these themes will enable the FSA to develop future research questions and support strategic decision making.

1.3 Source material

This document summarises key data and insight from three projects:²

Project	Aim	Method	Audience	Sample size
Efficacy of Recalls	To generate new insight into the withdrawal and recall process from a variety of perspectives to guide future research phases. Within this the FSA wanted to understand how consumers and stakeholder groups view the system, how the system could be refined, and get detailed views on how each step of the current process is working for different stakeholder groups.	Mixed Method	Consumers	135 via qualitative methods
				1,200 via quantitative methods
			Food businesses	200 via qualitative methods
			Local Authorities (LAs)	28 via qualitative methods
			Other stakeholders	37 via qualitative methods
Regulating our Future	To understand consumers' and food businesses' reactions to suggested changes to how UK food businesses are regulated and how suggested changes could work in practice.	Qualitative	Consumers	35
				Small food businesses
Transparency	To understand what the public think being transparent about food means, what their priorities are in terms of greater transparency, how they think transparency should be enacted and who they see as being responsible for being transparent.	Qualitative	Consumers	61

² Links to the original research materials and published reports are available in the Appendix. Please note, that insights from reports other than those listed here have not been reflected in this synthesis.

1.4 Report structure

For ease of reference, the remainder of this report is structured as follows:

- Chapter 2: Consumers' and food businesses' engagement with food issues: how do consumers and food businesses view their role in the UK food system, to what extent do consumers and food businesses actively engage and what drives engagement?
- Chapter 3: Trust in UK food systems: who do consumers and food businesses trust in relation to food and what factors facilitate trust between bodies within the UK food system?
- Chapter 4: Communication needs: how do consumers want to be communicated with and what factors support effective communication?
- Chapter 5: The future role of the FSA: what are consumers' expectations for the FSA and what appetite is there for regulatory involvement in the UK food system?

Findings relating to consumers and food businesses are discussed separately.³

A note on quotes:

Anonymous, verbatim quotes are used throughout this report to illuminate findings and are attributed as follows:

- "Quote." (Source, Report).

³ It should be noted that not all stakeholder groups were represented in each of the insight projects. All three projects engaged consumers. However, 'Regulating our Future' only engaged with small FBOs, 'Efficacy of Recalls' engaged with a limited number of small businesses and was the only research project to directly engage with members of the LA/Regulators, and 'Transparency' only engaged with consumers. A full breakdown of the sample is provided in the appendix to this document.

2. Context: Consumers' and food businesses' engagement with food issues and the UK food system

In this section we will explore the extent to which consumers and food businesses engage with food issues (such as production methods, animal welfare, regulation, cost, journey from farm to fork, etc.), their comprehension of the UK food system, and what consumers and food businesses understand their roles to be. We will then discuss the potential implications of these factors for stakeholders' views on changing how the UK food system is regulated.

Key findings:

There are six common themes which cut across the three insight projects. The first three relate to consumers:

- consumers' comprehension of and active engagement with the UK food system is generally low. Consumers presume regulatory standards are high and rigorously enforced. Consumers' confidence weakens when they learn their presumptions are inaccurate;
- engagement with the food system is highest among consumers who perceive they have a need for and ability to act on information; and,
- while awareness of the FSA is low, expectations of the level of protection provided by food regulators and efficacy of the regulatory system are high.

The next two relate to FBOs:

- FBOs understand that they are responsible for the health and safety of their consumers and have safeguards in place to meet these responsibilities; and,
- FBOs' abilities to dispose of the full range of their responsibilities are affected by their size and their available resources.

The final theme cuts across both consumers and FBOs. Findings from across all three insight projects suggest that proposed changes to how food is regulated in the UK would be welcomed, particularly if changes would increase transparency and reduce perceived regulatory burden on compliant smaller businesses.

2.1 To what extent do consumers engage with and understand UK food systems?

For many, food is a way of expressing their social and cultural identities. People's diets and food choices can link them to particular communities and identities (religious groups, being an 'ethical' consumer), reflect and produce social and cultural norms, and are shaped by their personal circumstances (allergies, locality).

Despite this, most consumers did not actively engage with issues related to food safety, regulation or systems as a whole, echoing previous insight that food safety is not at the top of people's food agendas.⁴ Consumers often took for granted that the food they buy is safe and is what it says it is. Although there were lingering memories of historic food incidents, such as the horse meat scandal (mentioned across projects), consumers typically felt standards are high and that the regulatory system was rigorous. Consumers often thought incidents of food poisoning were rare and most (62%) were unable to recall having seen, heard or read any food recall notice in the past 12 months.⁵

Although in many instances consumers are right to be confident in the UK food system insofar as it compares favourably with other countries, consumer confidence was typically based on a range of presumptions about how the UK system is regulated rather than facts. Consumers typically lacked a detailed knowledge of how food businesses are regulated, the meaning of official terms and how food gets from farm to fork. As the FSA has found in numerous research projects, including those contained in this synthesis, participants were often surprised and, in some instances, angered when they learnt about the realities of the UK food system. For instance in the 'Transparency' project participants were surprised to learn that food marked 'made in Britain' contained ingredients from overseas, including chicken from Thailand which had been frozen for up to 6 months. Participants had safety concerns about this and felt describing this product as 'made in Britain' was dishonest.

"I'm surprised more people aren't getting sick because [the regulatory system] seems quite lax."
(Manchester, C2DE, Wave 1, Regulating Our Future – Consumer Report).

When consumers learnt about the realities of the UK food system, they sometimes felt they are being deliberately misled and, in a sense, had been betrayed by individual food businesses and by a broader system that allows such 'deceptions' to happen. Although some felt certain food practices they learnt about were unsafe (such as the freezing of chicken for up to 6 months and the perceived lack of inspections) many were more upset about being miscommunicated with. While consumers tended to be relatively disengaged in learning about the food system and did not want to have to conduct extensive research about the food they buy (see Chapter 4 on communications), they did not want to be misled and felt clear transparent communication was a reasonable expectation to have of food businesses. Many lost confidence and trust in the UK food system (see next chapter for further discussion) as a result of feeling misled.

⁴ FSA and TNS BMRB (2016), Embedding Consumer Insight.

⁵ FSA and FSS (2017), Efficacy of Recalls, Consumers Phase 2a. Q011. Have you seen, heard or read any food recall notices in the past 12 months in any of the following places? Base: All participants (1200), all aware of food recall notice(s) in last 12 months (450).

2.2 What impacts consumers' abilities and willingness to engage with food issues?

Consumers' engagement with food issues is not uniform. Although engagement is generally low, some consumers in our research actively looked for information relating to the food they buy. This information typically related to ingredients and nutritional content, means of production or food safety.

Consumers who actively seek out information or research food issues typically had identified a personal need for the information and felt they could make meaningful choices about the food they eat. Consumers with permanent or semi-permanent food restrictions were the most likely to actively seek out this information. These restrictions could relate to allergies, religious diets or health (diabetes, coeliac disease). This theme emerged strongly in both the 'Efficacy of Recalls' and the 'Transparency' projects. For instance, consumers with allergies or intolerances (or who prepare food for people with an allergy or intolerance) were significantly more likely to have visited a government website about food recalls, signed up for text alerts, signed up for allergy alerts from the FSA/FSS or become a member of a food related consumer group (30% vs. 13% of all consumers).⁶

Consumers' likelihood to engage with food issues was also influenced by whether or not they experienced food restrictions (either voluntary or circumstantial). These restrictions either related to lifestyle choices (following a vegan or gluten free diet, being an 'ethical' shopper or someone who supports British business) or life circumstances (access to supermarkets, losing a job, moving home).

As with permanent/semi-permanent food restrictions, consumers following particular lifestyles (i.e. voluntary restrictions) were more motivated to engage with food issues as a means of expressing certain elements of their identity. Although this theme emerged most strongly in the 'Transparency' project, it also resonated with findings from 'Regulating Our Future – Consumers Report' where participants used personal judgements on a restaurant's appropriateness and standards when deciding where to eat.

In contrast, life circumstances could either encourage consumers to engage with food issues or act as a barrier to engagement. Some life circumstances restricted the extent consumers felt they could make meaningful choices about food. For instance, some consumers only had access to one supermarket locally and, due to low incomes, believed they could not afford to travel to alternatives. These consumers were less motivated to actively engage with food issues. The role of life circumstances is further illustrated by consumers' thinking and rationale when considering reasons to engage with a food recall. Consumers used rules of thumb such as food price and convenience as to whether or not to engage with a food recall. Although the exact cost threshold varied, consumers generally felt they would not return a 'low value' item if they would have to make a 'special' journey. Consumers claimed they would be more likely to return a 'high value' item.

"I took the [product] back to [the store]. I did consider just throwing it away as it was not expensive, but I was going there for a weekly shop anyway so thought I'd get my money back." (Phase 3b: experienced a recall, Efficacy of Recalls).

⁶ FSA and FSS (2017), Efficacy of Recalls, Consumers Phase 2a. Q020. Which of the following apply to you, either in the past or currently? Base: All participants (1200).

2.3 What is the relationship between consumers and regulators?

As with the UK food system as a whole, consumers made a number of presumptions about who regulates food coming into the UK, who regulates UK FBOs and how regulation works in practice. Most believed that a regulatory body exists. Consumers presumed that food bought in the UK is among the safest in the world and that this is the result of an effective regulatory system. As mentioned above, consumers believed that regulations are more stringent and more rigorously enforced than they are in reality.

“It’s kind of like the police of the supermarkets, right? That’s how I see it.” (Allergies, London, Efficacy of Recalls).

Consumers had low awareness of bodies that are involved in the regulation of the UK food system. Although consumers assumed there was a well-performing regulator acting in their interests, consumers often did not spontaneously mention the FSA, know its remit or know the services it offers (advice on food safety, channels for reporting food safety incidents, information on allergens). There was also confusion about the relationship between the FSA, Local Authorities (LAs), and national government.

Consumers made similar assumptions about the systems and processes FBOs have in place. They presumed systems are there for managing food recalls. However, they had limited ideas about what these systems actually are or the role of regulators in the recalls process.

Across research projects, consumers were comforted by the existence of the FSA and claimed they would make more use of the FSA in the future. Fundamentally, consumers believed that, as a public body, the FSA would act in the public interest to keep consumers safe.

Overall, low levels of knowledge of the UK food system, and awareness of organisations such as the FSA and the role of LAs, limited consumers’ ability to be active partners in the UK food system and weakened engagement in the system as a whole. When consumers were unaware of services or their rights, they were less able to access and engage with them. For instance, some consumers did not report food issues because they were unaware how to do so. Instead, they raised issues directly with businesses rather than reporting them to the FSA or their LA.⁷ Similarly, certain vulnerable groups (consumers with allergies, pregnant women) may not have taken up valuable services as they were not aware that they existed.⁸

2.4 What are FBOs views on their roles and responsibilities in the UK system?

FBOs recognise they have responsibilities to their consumers and take steps to ensure the food they prepare is safe and is what it says it is. All of the participants in our research engaged in some measures to keep their consumers safe.

Across both ‘Regulating our Future – Small Food Businesses’ and ‘Efficacy of Recalls’, the two projects where FBOs were engaged with directly, food businesses had designed a range of systems to demonstrate and aid compliance with food safety standards. Smaller FBOs commonly used FSA resources, including the

⁷ FSA, (2016), Regulating our Future – Consumers.

⁸ FSA and FSS (2017), Efficacy of Recalls.

'Safer Food Better Business' pack, to do this, while larger FBOs had sometimes engaged with third-party auditors or designed their own internal systems. FBOs appeared to 'default' to compliance to strong degree. FBOs typically felt that their responsibilities end at their front door. FBOs believed they could control what happens in their premises and that they should be held accountable for the safety of the food they sell. However, they perceived a need to trust that their suppliers are meeting similar standards. They have to rely on their suppliers being honest and selling them products which are authentic and accurately described.⁹ Similarly, although FBOs are willing to issue food recalls, and have in many cases, they often do not track the effectiveness of the recall. FBOs typically saw it as customers' and consumers' responsibilities to act on the advice they gave.¹⁰

2.5 What impacts FBOs' abilities to dispose of their responsibilities to consumers?

Although there was widespread agreement among FBOs that they are responsible for the safety of food they produce, FBOs' abilities to meet this responsibility varies with their size and resources. Small FBOs commonly felt that they lacked the resources and infrastructure of large FBOs and, in many instances, were financially insecure. Although research participants said they worked hard to be compliant, there was a belief among small businesses that some other small food businesses may cut corners to save time and money. Similar concerns were voiced by other stakeholders, including members of LAs and larger FBOs. Both groups doubted the abilities of small FBOs to effectively handle food recalls.¹¹ In contrast, insight from the FSA suggests large FBOs often have the resources to employ external auditors or internal specialists and have more advanced systems in place to help comply with food safety legislation.¹²

2.6 How do consumers and FBOs react to the prospect of changing how food businesses are regulated?

In 'Regulating our Future' and 'Efficacy of Recalls' the FSA discussed potential changes to how food businesses are regulated in the UK. The five key principles tested were:

- businesses are responsible for the safety and authenticity of the food they produce;
- businesses should meet the cost of regulation;
- businesses doing the right thing for consumers should be recognised and those which are not punished;
- decisions should be tailored, proportionate and based on a clear picture of UK food businesses; and
- the regulator should take into account all available sources of information.¹³

⁹ FSA, (2016), Regulating our Future – Small Food Businesses.

¹⁰ FSA and FSS (2017), Efficacy of Recalls. Please note that 'consumers' refers to members of the general public whereas 'customers' refers to other businesses in the supply chain.

¹¹ FSA and FSS (2017), Efficacy of Recalls.

¹² FSA, (2016), Regulating our Future – Small Food Businesses.

¹³ FSA, (2016), Regulating our Future – Small Food Businesses.

Consumers and FBOs reacted positively to these principles, providing that they would not result in lower standards. FBOs strongly agreed that they were responsible for the safety and authenticity of the food they produce but felt they should not be held responsible for the dishonesty of others (see Chapter 3). The principle of naming and shaming was commonly suggested as a way of recognising businesses doing the right thing and punishing those which do not, and initiatives such as food hygiene rating scheme (FHRS) were valued.

Both small FBOs and consumers felt proposed changes would lead to stronger protections and create additional pressure on non-compliant businesses. However, small FBOs emphasised that any costs should be low and proportionate to the business' size. It was also felt that costs should be applied when businesses were starting up as this is when costs are typically taken on. Costs associated with regulation can be factored in to businesses' general start-up costs.

Implications for the FSA when conducting future research:

- Consumers' perceptions of their own self-efficacy and information needs has a key role in their choices around food and their engagement in the UK food system as a whole. In light of this, conduct larger scale research to understand how much control consumers in different parts of the country feel they have over their food choices.
- Topics within this could include the type and range of food retailers customers have access to, the cost and affordability of food in local areas, consumers' cooking repertoire (in other words, what they know how to do with the food they can access) and what consumers want to know about the food they are buying.

3. Trust in the UK food system

This section discusses the concept of trust in the UK food system, including who consumers trust to act in their interests in terms of food safety and consumer rights, how FBOs think about trust, and factors that facilitate trust in the UK food system.

Key findings:

There are four common themes relating to trust which cut across the three insight projects in this synthesis report:

- consumers place greater trust in public entities, such as LAs and the FSA, to act in their interest when it comes to food safety, than in FBOs. This is because FBOs are felt to be fundamentally motivated by profit;
- when considering food businesses, consumers place the greatest trust in entities which are 'close' to them. Consumers feel small food businesses that have short supply chains, such as farmers' markets and local independent restaurants, are more accountable. In contrast, larger food businesses, such as supermarket chains, were felt to be less accountable and to employ staff on the ground that are less passionate about the work they are doing. As a result, consumers saw larger food businesses to be less motivated to prioritise food safety;
- trust is facilitated by transparency. While consumers and FBOs typically have a high degree of confidence in how the UK food system is functioning, most are aware the system is not perfect and that mistakes happen. Consumers' confidence and trust in FBOs and brands is enhanced when FBOs are honest and open about mistakes; and
- FBOs are confident that they have the right systems and processes in place to keep consumers safe and ensure the food they sell is what it says it is. This confidence is based on trust in the efficacy of their systems and the honesty of their suppliers. They believe that their suppliers meet their standards and that their systems and processes are complied with. However, they are sometimes unable to provide evidence that supports their confidence.

3.1 Who do consumers trust and why?

Consumers understood that there are a range of bodies involved in the journey of food from farm to fork. Although consumers could be surprised by the length and complexity of supply chains, as discussed in Chapter 2, they were aware that producers, retailers and regulators all have a role to play in getting food into the market. Consumers' trust in these bodies varied.

When comparing FBOs and public sector bodies, consumers placed the highest level of trust in public sector organisations. This was because they believed that these bodies prioritise the public good over commercial interests and that regulatory standards are high (see Chapter 2).

“I would have thought that there would be legislation with good policies in place [so] that if something goes wrong, like it would with anything.” (General Public, Edinburgh, Efficacy of Recalls).

In contrast, consumers felt FBOs were motivated by their financial bottom line. Although consumers did not distrust FBOs by default, they felt financial pressures mean FBOs may not be transparent, might cut corners during production or may follow the letter (rather than the spirit) of the law, if it were to result in better profit margins. As a result, consumers generally placed less trust in FBOs than in public bodies, such as the FSA or LAs. This has been a consistent finding across the research projects included in this synthesis report.

“I’m quite critical of these companies covering it up because at the end of the day it’s going to damage their business by putting it out there so I don’t trust them to give you the full story and put it fully out in everybody’s face.” (Students, Manchester, Efficacy of Recalls).

Despite thinking all businesses are, to a degree, financially motivated, consumers placed greater trust in businesses that were ‘close’ to them. These ‘close’ businesses are those that are local, independent and have short supply chains. Consumers commonly felt they are more able to engage with and hold such businesses to account. Bad reviews have the potential to damage an FBO’s reputation in a small community and consumers may be able to ask questions about the provenance of food directly to the FBO.¹⁴ Consumers also felt businesses with shorter supply chains have more oversight and control over their supply chains, and that their food is potentially safer as a result. Although consumers trusted these ‘close’ businesses more in light of these factors, consumers recognised that small businesses have fewer resources than larger businesses and may be more vulnerable to financial pressures.

In contrast to small businesses, consumers thought that large businesses are more remote and less accountable to consumers. Large chains may not take local consumer needs into account and be more profit driven. They were perceived as more likely to be part of global supply chains and therefore as having less oversight of what suppliers are doing, particularly if their suppliers are based overseas.¹⁵ Finally, consumers felt that people employed by large food business are less personally invested in their companies. As a result, they may be less likely to comply with systems and processes and follow best practice when it comes to food safety. Despite consumers recognising that large food businesses have access to more resources to ensure food safety, there was less trust that individual consumers would be able to hold large food businesses to account.

3.2 How do FBOs relate to the issue of trust?

FBOs recognised trust plays a key role in the effective functioning of the UK food system. As discussed, FBOs understood they are responsible for the safety and authenticity of the food they produce and most

¹⁴ FSA, (2017), Transparency; FSA, (2016), Regulating our Future – Consumers.

¹⁵ Please note, consumers had general concerns about the quality and sometimes safety of food produced overseas.

were confident in the processes and systems they have in place to meet this obligation. This was something which customers expected. However, there appeared to be a relatively low degree of self-assessment or 'checking' behaviour within food businesses when it came to understanding the effectiveness of internal systems and the honesty of suppliers.

While most of the FBOs Kantar Public engaged in research were confident that they are compliant, FBOs were aware that they depend on businesses which supply them to maintain similarly high standards. In the case of delivering an effective food recall, for instance, a manufacturer that has become aware of an issue has to trust that the businesses it supplies have the necessary processes in place to get a product off the shelves and get customers to return any product they may have bought. There was a general reluctance among FBOs to be held accountable for the actions of people outside of their organisations and their direct control. In many instances FBOs appeared to trust that mutually aligned commercial interests will keep their partners honest. There was a sense that suppliers will meet the terms laid out in their contracts and produce food to the agreed quality, otherwise businesses will not contract with them again.

Similarly, the extent to which food businesses engaged in any self-assessment of internal systems or processes appeared to be limited. Findings from the 'Efficacy of Recalls' project suggested large businesses did not actively assess the effectiveness of the recall system. Despite having not tested their systems, they remained 'confident' that their systems are effective. Likewise, findings from the 'Regulating our Future – Small Businesses' project suggested that FBOs relied on feedback from inspectors to understand whether processes are suitable and effective rather than taking a view themselves.

There is a sense that, so long as systems are in place and an organisation has made efforts to be compliant, an FBO has met its obligations. Many FBOs appeared to be more focused on complying with their obligations in their part of the process rather than on outcomes for consumers. Although they may have contracts and agreements in place, FBOs did not have a clear view of what businesses upstream from them are doing and lacked feedback mechanisms to test whether or not suppliers are compliant. They assumed that a positive consumer outcome follows on from having appropriate processes, but did not confirm that suppliers are complying with processes or standards. This suggests that, for many FBOs, whether their efforts to protect consumers are effective are matters of trust rather than matters of fact.

3.3 What role does transparency have in supporting trust?

As outlined in the preceding chapters, findings from the research projects included in this synthesis report suggest that high levels of trust are critical for the effective running of the UK food system for both businesses and consumers. Consumers have to trust that regulators are holding FBOs to high standards and that the food they buy is safe and what it says it is. FBOs have to trust that workers are complying with internal policy, that internal systems and processes are rigorous enough to ensure food safety and that their suppliers are taking similar steps. Neither FBOs nor consumers are habitually actively seeking out information from suppliers, regulators or FBOs relating to food issues, unless they have a specific need.

Consumers' trust in FBOs, and FBOs trust in one another, is supported by all FBOs in a supply chain being transparent about their products and processes. In this context, being transparent means being honest and

accountable. This applies both to the labelling of ingredients and provenance of the product¹⁶ and when something goes wrong.¹⁷

Whether they are passing information to another food business or to consumers, consumers and FBOs feel food businesses have to ensure that they are honest about the content of a product, its provenance, and methods used during production. When engaging with consumers, FBOs also have to ensure that they are providing information in a way that is understandable. While communication will be discussed further in Chapter 4, language and design features that are difficult for consumers to engage with can erode consumer trust in the food system: they make the food system less transparent and can lead to consumers feeling misled. As discussed in Chapter 2, when consumers learn that their presumptions about UK food businesses are inaccurate they can have strong negative emotional reactions. Their confidence is weakened. Conversely, when consumers find that an FBO has been honest, particularly when something goes wrong, as we saw in 'Efficacy of Recalls', their confidence and regard for a particular brand can be strengthened. In short, the extent to which the UK food system is transparent fundamentally shapes whether or not consumers can trust that the food they are buying is safe and what it says it is.

"My only negative would be against a retailer/supplier that would try and cover up a mistake/fault in an item. I would personally never buy that brand or use that retailer again as my trust would have been destroyed." (Phase 3b: experienced a recall, Efficacy of Recalls).

Implications for the FSA when conducting future research:

- Food businesses often want to protect their reputations and may be reluctant to talk publicly about mistakes or errors when they happen as they judge such transparency would negatively impact sales. However, we know from research that lack of transparency and consumer perceptions that businesses 'have something to hide' can negatively impact on public trust in the food system as a whole.
- The FSA should conduct further research into the reception and long-term impact of disclosures and increased transparency on the part of businesses and regulators on trust in businesses and the UK food system as a whole. This may encourage food businesses to actively disclose in the event of an issue or error.
- Consider developing a tool kit to support businesses in being transparent. This may include templates to help businesses communicate with consumers, such as for recall notices.

¹⁶ FSA (2017), Transparency.

¹⁷ FSA and FSS (2017), Efficacy of Recalls.

4. Effective communication with consumers

In this section we discuss consumers' communication preferences and the impact of communication styles on trust.

Key findings:

There are three common themes relating to communications which cut across the three insight projects in this synthesis:

- generally, consumers only actively engage with information about food when they are making a purchase and do not seek out information, unless they have an identified need (such as an allergy);
- although consumers believe that they are 'savvy' when it comes to communication from FBOs, they sometimes see themselves as being misled. This perception erodes trust in both brands and the UK food system as a whole; and,
- effective communication balances being transparent and reducing the burden on consumers. Consumers like shortcuts and visual heuristics, such as traffic lights and standardised formats, which make it easy for them to quickly absorb information and make purchasing decisions.

4.1 When do consumers engage with information about food?

For the most part, consumers made little effort to find out information about the food they were buying. Typically, consumers checked information when making purchases (for instance, looking at information about a product's nutritional content or the food hygiene and rating score (FHRS) of a business) or heard information about food products and events (such as recalls) on the news. Beyond this, many consumers did not actively seek information related to food.

Consumers that did actively seek information typically had specific information needs, such as an allergy (see Chapter 2). However, even among consumers with specific information needs, substantial numbers of consumers did not, at the time of the research, seek out or use available information sources. For instance, almost a third (29%) of people with or who look after people with allergies or intolerances said they never check for recall notices.¹⁸ Similarly, more than nine in 10 (92%) had not signed up for text alerts or had not signed up for allergy alerts from the FSA/FSS.¹⁹ As a general rule, consumers wanted and engaged with information if it would help them decide what to do next, for instance, purchase a product, or comply with a food recall. Knowing for the sake of knowing held little appeal. In the context of research, participants

¹⁸ FSA and FSS (2017), Efficacy of Recalls, Consumers phase 2a. Q019. In general, how often do you check or look out for food recall notices? Base: All consumers (1200).

¹⁹ FSA and FSS (2017), Efficacy of Recalls, Consumers Phase 2a. Q011. Have you seen, heard or read any food recall notices in the past 12 months in any of the following places? Base: All participants (1200), all aware of food recall notice(s) in last 12 months (450).

claimed to want more information, when they learnt that their presumptions about the UK food system were incorrect.

4.2 How do consumers prefer to engage with information about food?

Across the projects in this synthesis, consumers gave consistent feedback about their communication preferences, both in terms of channel and communication style. Consumers considered themselves to be time poor. They therefore wanted access to relevant information to be as quick and easy as possible. Consumers' suggestions focused on making it easy for people like them to make purchase decisions.

Consumers wanted information to be available when they were making purchase decisions, which typically meant in store or on specific products. For instance, in 'Efficacy of Recalls', consumers said they wanted recall notices to be placed near store entrances and exits, in the relevant product aisle or by the check-outs. Similarly, they requested compulsory display of FHRs scores as a way of helping them decide if they wanted to eat in a particular venue.²⁰

"The interface between industry and us [the consumer] is on the label on packaging, so [it's] more information at point of sale on the packaging [that is needed]." (C2DE, London, Transparency).

Consumers also wanted to see a degree of standardisation in how information is presented. They felt having a standardised approach to design, such as in recall notices, made it easier to recognise, understand information and compare similar products. The use of standard terms or symbols, such as the 'red lion' or FHRs stars, displayed in similar places across products helped consumers make quick decisions.

Finally, consumers wanted information to be communicated visually, where possible. Consumers felt images were often easier to access than written descriptions. Symbols and colour coding, such as the now well established 'traffic light' system, can act as a convenient shorthand and help consumers judge if a product is suitable for them. In contrast, written communications can be misleading or difficult for consumers to engage with as they can be long or use technical, scientific language.

"Everyone knows that the colour red means danger ... you see red and you go like uh-oh." (Pregnant women, London, Efficacy of Recalls).

"Maybe like an FSA stamp on the food, everybody will recognise it like the way 'Score on the Doors' are, maybe on the food." (C2DE, Belfast, Transparency).

In short, participants across research projects wanted the communication burden on consumers to be reduced wherever possible.

4.3 What should food manufactures and regulators be aware of when communicating with consumers?

Although consumers clearly articulate their communication preferences, our research suggests they often feel misled by the language and symbols already being used by food businesses, regulators and other

²⁰ Display is already compulsory in Northern Ireland and Wales.

organisations (see Chapter 2). This occurs when they learn that the meaning they inferred from the symbols and language being used was wrong, and can have a negative impact on trust as consumers can feel betrayed.

In light of this, FBOs and regulators should be cautious when communicating with consumers, particularly when using symbols or other forms of 'shorthand'. Although visual shortcuts and rules of thumb are 'easy' for consumers to engage with and make judgements about, they are liable to be misunderstood. The principles of openness, honesty and transparency should guide the development of all communications materials. Wherever possible, communication materials should be tested or co-designed with consumers to ensure that there is a common understanding and meaning between consumers, food businesses and others when it comes to the terms and symbols being used. This will support effective communication and the continuation of trust in the UK food system.

Implications for the FSA when conducting future research:

- Consumers' trust in the UK food system and food businesses is supported by clear and honest communication on the part of food businesses and the FSA.
- When developing its own communication tools (such as FHRS), the FSA should continue to conduct communications testing to understand whether a particular communication tool is functioning as intended. For instance, the FSA may wish to conduct further research on recall notices to inform the design of standard templates which have a clear call to action for consumers.
- Where appropriate, the FSA should also encourage food businesses to use FSA provided templates, particularly where issues are relevant to consumer safety (e.g. in the efficacy of recalls space). Having a standardised approach will reduce the cognitive burden on consumers and the administrative burden on food businesses. The FSA may want to co-design or co-develop such tools with FBOs and consumers to ensure these meet the needs of various stakeholder groups.
- Finally, where practicable and appropriate, the FSA should encourage food businesses to confirm whether consumers' understanding of specific symbols or terms aligns with the actual definition through research and communications testing. This is important both for supporting consumer choice and to protect food businesses' brand equity as consumers who feel they have been misled can become brand detractors. Issues relating to food safety and food issues that are core to consumers' identities (e.g. religious or cultural practices) should be prioritised.

5. The future role of the FSA

In this section we discuss how consumers envisage engaging with the FSA in future and the role technology may have in shaping how consumers, FBOs and the FSA interact with one another.

Key findings:

There are three common themes relating to the future role of the FSA which cut across the three insight projects within this synthesis:

- once aware of the FSA, consumers see an opportunity for it to play a greater, more visible part in regulating and quality assuring food in the UK;
- consumers see a vital role for public sector entities in setting and enforcing high standards; and
- food businesses anticipate that technology will transform how they engage, and demonstrate that they are compliant, with regulations.

5.1 What role do consumers, food businesses and LAs see for the FSA in the future?

FBOs, LAs and consumers had varying awareness of the FSA. FBOs and LAs were understandably very aware of the FSA and its remit. This was because these parties regularly come into contact. In contrast consumers, before engaging in research, typically had low awareness of the FSA. They presumed that there was a body involved in enforcing food regulations, however, they were generally not able to name the FSA or describe its remit.

Despite this low awareness of the FSA specifically, consumers felt that they needed an authoritative source of information about food and the reassurance of a strong, effective regulator. Consistently, consumers said they did not trust FBOs to always act in their best interest or be fully honest due to conflicting financial incentives. As a result, they wanted a public sector presence to act on their behalf.

Consumers saw two primary roles for public sector bodies. First, consumers wanted central government to set high standards and draft effective regulations that would keep them safe, ensure high welfare standards and help prevent consumers feeling misled. Second, consumers felt there should be a strict enforcement of these standards to ensure FBOs were meeting their legal obligations and acting within the spirit, as well as the letter, of the law.

Once aware of the FSA, consumers typically felt its role should be maintained and strengthened. FBOs and LAs agreed, seeing the FSA and regulatory enforcement as necessary. Both groups were supportive of proposed changes to how regulation is delivered (see Chapter 2), particularly if it would mean resources being targeted at those which represented the greatest risk to the public.

5.2 How could the FSA fulfil this role?

Generally, consumers want the FSA to be more visible when regulating food businesses. Across research projects, participants suggested the FSA require the mandatory display of FHRS scores and engage in more aggressive naming and shaming. When discussing how FBOs could be regulated in the future, consumers also made suggestions such as having visible graded FSA stamps or approvals on products for them to be sold in the UK, particularly if they have been imported. Consumers felt these stamps would convey meaning on two levels. First, they would confirm a product was 'safe' and was communicating information accurately. Second, different 'grades' of stamps would reflect whether or not an FBO was meeting minimum requirements, or exceeding them (in other words whether or not they were complying with the letter or the spirit of the law).

Consumers also feel there is an opportunity for the FSA to become known as the definitive voice of food safety. Currently, consumers can find it challenging to find out information about food. In the 'Transparency' project there were several examples of participants struggling to find answers to their food related questions and neutral fact-based information sources. Consumers found information from brands to be laden with 'marketing speak' and to be deliberately misleading as a result. Information from special interest groups was also considered biased. In light of this, consumers feel there is an opportunity for the FSA to fill this gap and be a voice consumers can trust for information about food. To do this effectively, the FSA would need to increase its own brand awareness.

For the most part, consumers feel people like them would potentially become more engaged with the UK food system if they were aware of the FSA and the range of services and resources it provides. Low use of things such as 'allergy alerts' suggests that awareness is low. Similarly, consumers in 'Regulating our Future' claimed not to know how to report a business and who they should go to. Increasing consumer awareness of the FSA may support use of information sources and promote consumer participation in regulation. Consumers identified challenges to accessing and understanding information about food and the UK food system. They feel that there is a lot of information out there but that it is hard to know what or who to trust. Consumers think the FSA could meet this need.

There may also be opportunities for the FSA to change the way in which it works with FBOs in the future. The FSA should look to make greater use of technology to engage with consumers and FBOs. Consumers and FBOs variously suggested creating websites to provide access to information which may be relevant to niche groups. Technology also has the potential to transform the way FBOs demonstrate that they are meeting their statutory obligations, while reducing the burden on employers. For the most part, FBOs and LAs feel technology will have a positive impact on their ways of working.

Finally, the FSA should consider how it works with businesses behind the scenes to keep consumers safe. Research consistently suggests that, outside of the research context, consumers have little awareness of and interest in food safety issues unless they perceive a personal information need. In light of this, the FSA may want to identify ways to support businesses to communicate with the public about food safety issues,

such as recalls, by providing them with templates and standardised forms. Research with consumers and businesses suggests there is an appetite for this.²¹

There may also be opportunities for the FSA to help businesses work with each other. At present, the research identified businesses are confident that they are doing the right thing, having established internal processes to keep consumers safe. However, they have to trust that suppliers and customers are doing the same and do not appear to have the means to hold partners to account (beyond withdrawing their custom). In light of this, the FSA may wish to support businesses to strengthen their systems and relationships with one another. At present, businesses rely on past experience with a supplier to judge the strength of the relationship. The FSA could potentially provide information to FBOs to support them in their judgements; for instance, by actively sharing FHRS scores. Such measures may increase accountability through the food chain and ensure responsible parties are held to account.

Implications for the FSA when conducting future research:

- Although the name 'Food Standards Agency' has good recognition among consumers, a consistent finding across these pieces of research has been that consumers are not typically aware of what the FSA does and as a result do not use FSA resources or engage with the food system. FSA should conduct research to map current awareness levels and potential ways of promoting awareness, with the ultimate aim of supporting consumer engagement with the UK food system.
- At present, consumers find navigating the UK food system and answering their own questions about food challenging. The lack of a single information portal was, for many, a barrier to engaging with information about food. Although consumers' priorities will vary based on life stages, lifestyle choices and perceptions of information need, further research could direct the FSA towards key priorities which cut across different consumer groups.
- Food businesses currently struggle to judge the efficacy of their internal systems. Although they think they are effective, they have little evidence to 'prove' this or assess the effectiveness of systems and processes (e.g. recalls). The FSA could work with FBOs to support them in managing the effectiveness of their systems, for instance, through providing standardised templates for communicating with the public and information on suppliers' FHRS scores. Further research with FBOs could indicate what appetite there is for this and support delivery of templates and tools going forward.

²¹ Please note that the FSA holds wider data on consumers' views and interest in initiatives such as 'naming and shaming' and interest in animal welfare. This has not been factored into this synthesis report.

6. Appendix

FSA, FSS and Kantar Public. Efficacy of Recalls

<https://www.food.gov.uk/sites/default/files/recalls-efficacy-report.pdf>

- Key question: what are the key features of the current process, what level of public awareness is there, and how does being a member of a high-risk group affect attitudes and behaviours?
- Method: Mixed-method, quantitative and qualitative approach
 - 45-minute telephone interviews with consumer and industry interest groups (x37) and Local Authority officials (x28)
 - Web survey of 1200 members of the general public
 - 90-minute face-to-face workshops with 105 members of the general public
 - 5-day online forum with 30 members of the general public

FSA and Kantar Public. Regulating our Future

<https://www.food.gov.uk/sites/default/files/rofresearchwiththepublic.pdf>

<https://www.food.gov.uk/sites/default/files/rofsmallfoodbusinessoperatorsreport.pdf>

- Key question: how do consumers and small FBOs react to the idea of changing the system, respond to the five key principles that will inform the design of the future model, and anticipate how the new regulatory model may look in practice?
- Method: Reconvened workshops with the general public and depth interviews with FBOs
 - 5 x reconvened workshops with the general public with an interval in which to complete an 'ask a friend' homework task, 7–8 participants per session
 - 24 x 90-minute depths with FBOs across England and Wales, covering a range of business types

FSA and Kantar Public. Transparency: understanding public views and priorities

https://www.food.gov.uk/sites/default/files/transparencyreport_0.pdf

- Key question: what do the public think being transparent about food means, what their priorities are in terms of greater transparency, how they think transparency should be enacted and who they see as being responsible for being transparent?
- Method: Reconvened deliberative Citizens Forums
 - Interval homework task
 - Reconvened 8 x 2-hour sessions with 7–8 participants per session
 - England, Wales and Northern Ireland

- Varied socio-economic composition

7. Quality Assurance:

This project was carried out in compliance with our certification to ISO 9001 and ISO 20252 (International Service Standard for Market, Opinion and Social Research)

