



Communications and Engagement

Issue

1. This paper presents an update on the project's communications and engagement plan, as well as activity undertaken by the project team since the last meeting of the ESRG.

External Stakeholder Reference Group action

2. The External Stakeholder Reference Group is asked to:
- **Consider and comment on** activity to date; and
 - **Identify** opportunities to broaden the reach of the review's communications and engagement activity, particularly with a view to increasing engagement with the work being undertaken by Kantar Public.

Background

3. As part of the process of reviewing and identifying measures to improve withdrawal and recall processes for food sold at retail, the FSA and FSS are conscious of a duty to ensure stakeholders are effectively engaged and given the opportunity to identify changes to improve the system. This will be realised with appropriate and timely engagement with consumers, charitable organisations, regulators and industry.

4. To achieve this, the project team has devised a Communications and Engagement plan, which was presented and agreed at the last meeting of the Project Board. This plan sets out our approach to each stakeholder group (eg consumers, regulators, industry and internal FSA and FSS departments) through:

- Identifying current and future positions of each group with respect to their interests in the project and outcomes;
- Outlining the core messages that we wish to give to our stakeholders and a range of communication channels that may be used to communicate with them; and
- Mapping engagement with stakeholders on a weekly basis for a rolling three month period.

The plan is overlaid with project events and key milestones and will be reviewed on a weekly basis by the project team and formally by the Project Board. A copy of the plan is at **Appendix A**. Please note that the plan is currently focussed at a UK-wide

level and further mapping is to be undertaken to capture devolved-specific stakeholders.

5. The ESRG was established in part to help the FSA and FSS meet the communication and engagement challenges the project presents, and its input will be key to the review process.

Stakeholders

6. To ensure our engagement and communications are properly targeted at a UK level, we have undertaken work to identify who our stakeholders are at this level, and the level of interest and influence they have in improving the current system for withdrawing and recalling food. This process has helped the project to both identify and establish a prioritised approach to engagement and communications with stakeholders. The prioritised areas are:

- Priority 1 – Key players who have a shared interest in the outcome of the project
- Priority 2 – Those who we should involve in the project and critical to decision making
- Priority 3 – Those that we should consult with
- Priority 4 – Those who we should inform.

The plan details the stakeholder analysis and the stakeholders that fall into the above priorities which, broadly speaking, fall into external stakeholders representing industry, regulators and consumers, and internal stakeholders.

Communications and Engagement to date

7. On the 7 December 2016 ESRG members were provided with a bulletin, which gave an update on the review, as well as a short document to distribute to their members explaining the aims of the review and how it will be carried out, including information on the work being undertaken by Kantar Public. It is planned that these updates will take place regularly in between ESRG meetings for members' information and distribution.

8. The FSA and FSS has introduced new internal procedures and processes to ensure improved messaging to Local Authorities (LAs), with the aim of encouraging more efficient handling and issuing of recall notices, allergy alerts and food alerts. Both the FSA and FSS have written to LAs to outline the changes and to remind them of their roles and responsibilities when managing incidents.

9. The FSA's communications team will now develop a page on [Food.gov](#) where we can publically make available information to ESRG and their members, as well as being a place we can direct stakeholders through social media activity. We are waiting for final confirmation but this page should be available in the New Year.

10. The project team are shortly meeting with Chartered Institute of Environmental Health (CIEH) and Trading Standards Institute (TSI) with a view to providing them with an update on the review and exploring the potential for articles to be published in their professional journals. We will look to explore further opportunities to promote the review in trade publications over the coming weeks and would be grateful for any help or steer that ESG members can provide in this area.

11. The Stakeholder Reference Group is asked to consider and comment on activity to date, and to identify opportunities to broaden the reach of the review's communications and engagement activity, particularly with a view to increasing participation rates in the work being undertaken by Kantar Public.

Next steps

12. The Communications and Engagement plan will be refined to take account of the ESG's discussion and taken forward.

13. The ESG will receive a further bulletin update between the date of this meeting and the next.

**Stakeholder Reference Group Secretariat
December 2016**

APPENDIX A

Efficacy of Withdrawals and Recalls Stakeholder Engagement and Communications Plan

Draft

at 21 December 2016

1. Engagement and Communication Objectives

- 1.1 The project's overall engagement and communications objective is to ensure stakeholders are effectively engaged in the review of food withdrawal and recall processes and any identified changes to improve the system. This will be achieved with appropriate and timely engagement with key stakeholder that represents consumers, regulators and industry.
- 1.2 The project also recognises the need to ensure that the wider FSA and FSS is engaged in the project through the provision of timely information and engagement with staff and other dependent projects and programmes.

2. Background

- 2.1 The system for withdrawals and recalls in the food sector is not broken, however there is very little information that allows us determine whether it works effectively in the interests of consumers, how consumers respond to recalls and the performance of organisations both public and private involved in this process.
- 2.2 In light of concerns regarding recalls in non-food sectors, increasing numbers of food recalls received by the FSA and FSS and our respective strategic aims of ensuring consumers have access to safe food and food is what it says it is, a project has been established to review withdrawal and recall processes in the retail sector.
- 2.3 The scope of the project is limited to the retail sector, (small, medium and large food businesses) and those organisations that support this sector, such as manufacturers, wholesalers and distributors. Project research will focus on organisations that represent consumers, industry trade bodies and regulators.
- 2.4 The review of food withdrawals and recalls is a strategic priority and directly contributes to the FSA's strategy for 'Food we can trust'. Specifically, it supports strategic outcomes, food is safe and food is what it says it is by ensuring both Food Business Operators (FBOs) and regulators have effective

procedures in place to trace, withdraw and recall food that is unsafe or food which is not what it says it is and consumers receive information that allows them to make informed choices knowing the facts.

2.5 The objectives of the project are to:

- I. Ensure that FBOs are fulfilling their statutory responsibilities in relation to food withdrawal and recall requirements;
- II. Ensure that UK competent authorities(CAs) at a local and national level are fulfilling their statutory responsibilities in relation to food withdrawal and recall requirements and that these are being undertaken in the most effective manner;
- III. Improve systems for notifying consumers of food recalls, including how high risk groups are targeted so that consumers can take responsibility and make informed choices.

3. Stakeholders

3.1 To ensure our engagement and communications are properly targeted we have undertaken work to identify who our stakeholders are at a UK level and the level of interest and influence they have in improving the current system for withdrawing and recalling food. Please note that the plan is currently focussed at a UK-wide level and further mapping is to be undertaken to capture devolved-specific stakeholders.

3.2 This process has helped the project to both identify and establish a prioritised approach to engagement and communications with such stakeholders. The prioritised areas are:

- Priority 1 – Key players who have a shared interest in the outcome of the project
- Priority 2 – Those who we should involve in the project and critical to decision making
- Priority 3 – Those that we should consult with
- Priority 4 – Those who we should inform.

3.3 Annex 1 details the stakeholder analysis and the stakeholders that fall into the above priorities, which broadly speaking fall into external stakeholders representing industry, regulators and consumers and internal stakeholders such as the Executive Management Teams of the FSA and FSS and dependent projects.

4. Communication Challenges

- 4.1 From a communication perspective getting it right means that our stakeholders will feel included, signed up and supportive of the aims and objectives of the project and importantly have the capacity to contribute towards an improved withdrawal and recall system. Getting it wrong means a loss of credibility and trust for the project and wider FSA and FSS.
- 4.2 Developing the project with the support of key stakeholders is vital and therefore the project will develop a communication and engagement plan that provides this group with direct access to the project team and the means for two way communications.
- 4.3 The project also recognises that all groups identified in the stakeholder analysis need to be kept informed of the project and the communications plan will develop mechanisms for keeping these groups informed about project progress and how to access further information if required.
- 4.4 To overcome some of these communication and engagement challenges the project has established an External Stakeholder Reference Group (ESRG) to help guide and support the project. This group is made up key stakeholder representing industry, regulators and consumer groups. The agenda, papers and minutes associated with ESRG meetings are made publicly available via Food.gov website. The project will seek to use this group to communicate to their respective memberships.
- 4.5 To promote and support the project internally the project has established a working group made up of key FSA and FSS departments. A key consideration for the group will be how to use this group to take messages / updates back to their colleagues and how we engage with the EMT as the project develops.

5. Audiences, Outcomes, Messages and Channels

- 5.1 As this project relates to the improvement of UK systems for withdrawing and recalling food, the project team will work with FSS and devolved FSA offices to ensure audiences, outcomes and messages are correct.

Audience	Outcome	Current Position	Message	Channels and approach
Consumers	Consumers have the ability to make informed choices about the food they eat. Consumers have access to	In non-food areas there is evidence that consumers are not aware of recalls or choose not to react to recalls.	The system for withdrawing and recalling food is not broken, but we don't have enough information to say it is working efficiently.	Food.gov website Print media / Newspaper articles FSA Board

Audience	Outcome	Current Position	Message	Channels and approach
	<p>information about foods that are subject to recall.</p>	<p>The impact of recalls in the food sector on consumer behaviour is unknown.</p>	<p>Due to increased numbers of food withdrawals and recalls and concerns about how recall systems operate in non-food sectors the time is right to review the system.</p> <p>Through commissioned research we are exploring consumer behaviour to recalls, so that we can improve the system to meet consumer needs.</p>	<p>updates</p> <p>Social media</p> <p>Research through the Consumer panel</p>
<p>High risk groups</p>	<p>Receive timely and accurate information about recalled foods that allows them to make informed choices.</p>	<p>Groups representing some high risk groups have developed systems for informing consumers about food recalls.</p> <p>There is evidence that some high risk groups (the elderly) choose not to believe information put out by government departments.</p> <p>There is a question of accessibility to recall information.</p>	<p>The system for withdrawing and recalling food is not broken, but we don't have enough information to say it is working efficiently.</p> <p>Due to increased numbers of food withdrawals and recalls and concerns about how recall systems operate in non-food sectors the time is right to review the system.</p> <p>We have commissioned research to identify issues with the current system and we are keen to engage with consumer groups that represent high risk groups to understand how the system could be improved.</p>	<p>Direct representation on ESRG</p> <p>Food.gov</p> <p>Social media</p>

Audience	Outcome	Current Position	Message	Channels and approach
<p>Regulators</p> <p>LAs</p> <p>District councils, County councils Metropolitan councils, City councils, Port Heath Authorities,</p>	<p>Support the system so that it works efficiently in the interest of consumers.</p> <p>Clearly understand their role and responsibilities</p>	<p>There is evidence that regulators are not clear about their role supporting the withdrawal and recall process.</p> <p>There are no criteria for monitoring the performance of the current system.</p>	<p>The system for withdrawing and recalling food is not broken, but we don't have enough information to say it is working efficiently.</p> <p>Due to increased numbers of food withdrawals and recalls and concerns about how recall systems operate in non-food sectors the time is right to review the system.</p> <p>We are keen to understand the issues faced by regulators and have commissioned research that will look at the impact of the current system on regulators</p>	<p>Social media</p> <p>Contact / updates with organisations that represent regulators CIEH, REHIS, NTSB, PHE and international organisations such as RASFF and Infoson</p> <p>Use of professional journals (CIEH / TSI)</p> <p>Representation on ESRG</p> <p>Food.gov</p> <p>Update provided through the roll out of any potential training programmes</p>
<p>Industry</p> <p>Small / medium and large retailers</p> <p>Manufacturers / wholesalers and distributors that support the retail sector</p>	<p>Clearly understand their role and responsibilities within the withdrawal and recall process.</p>	<p>Key stakeholders in this group have indicated that the system could be improved.</p> <p>Access and response to recalls and withdrawals varies across industry.</p>	<p>The system for withdrawing and recalling food is not broken, but we don't have enough information to say it is working efficiently.</p> <p>Due to increased numbers of food withdrawals and recalls and concerns about how recall systems operate in non-food sectors the time is right to review the system.</p> <p>We are keen to understand the</p>	<p>Food web</p> <p>Representation on ESRG</p> <p>Updates / briefs provided to ESRG to share with ESRG members</p> <p>Trade press / print media.</p> <p>Food. gov</p> <p>Social media</p> <p>Specific 1:1 meetings with</p>

Audience	Outcome	Current Position	Message	Channels and approach
			issues faced by industry and have commissioned research that will look at the impact of the current system on industry	industry. Attendance at trade fairs and conferences.
<p>Internal stakeholders</p> <p>EMT</p> <p>FSA Board</p> <p>Dependent projects</p> <p>FSA colleagues</p>	<p>Are fully aware of the project, what its aims and objectives are and time scales for delivery.</p> <p>Continue to support the project.</p> <p>Are aware of project progress and next steps.</p> <p>Know who to contact for further information regarding the project.</p>	<p>This will vary between internal stakeholders.</p> <p>EMT are aware of the project but need to be kept informed of progress.</p> <p>Wider FSA may not be fully aware of the project.</p> <p>Other programmes and projects may not be aware of this project.</p>	<p>The system for withdrawing and recalling food is not broken, but we don't have enough information to say it is working efficiently.</p> <p>Due to increased numbers of food withdrawals and recalls and concerns about how recall systems operate in non-food sectors the time is right to review the system.</p> <p>We are working with the Regulating our Future programme as we develop the system.</p> <p>EMT have identified the Withdrawal and Recall project as a strategic priority</p>	<p>EMT updates</p> <p>Management Community updates</p> <p>Yammer updates</p> <p>Departmental briefs / updates</p> <p>Representation at departmental / team meetings</p> <p>Food web</p> <p>Face to face workshops with FSA colleagues</p> <p>Articles in FSA news letter</p>
<p>Other Government Departments</p> <p>Public Health England, Public Health Wales</p> <p>Public Health Agency</p> <p>Health protection Scotland</p>	<p>Are aware of the project and support the project</p>	<p>Unlikely to be aware of the project</p>	<p>The system for withdrawing and recalling food is not broken, but we don't have enough information to say it is working efficiently.</p> <p>Due to increased numbers of food withdrawals and recalls and concerns about how recall systems operate in non-food sectors the time is right to review the system.</p>	<p>Briefing via CEO and Directors with OGDs</p> <p>Meeting with OGDs to explain the rationale for the project.</p>

6. Audience Insight

6.1 Consumers

- 6.1.1 It is vital that the withdrawals and recall process works in the interests of the consumer and the project has therefore commissioned research which will seek to examine this area. Consumers will be engaged through the consumer panel and citizen workshops and online forums, organisations that represent consumers attending ESG and information made available to all consumers via food web, social media and press articles.
- 6.1.2 Where possible we will look for opportunities to publish articles in the press promoting the work of the project.

6.2 Regulators

- 6.2.1 Regulators are an important part of the withdrawal and recall process and we will look to keep them both informed about the project and access to influence the development of the project.
- 6.2.2 We know regulators are under considerable resourcing pressures, and we know that regulators will be aware of the Regulating our Future programme. There is a risk that regulators may feel they are being critically examined and as a consequence threatened by this project, particularly when we undertake research looking at their responsibilities in the withdrawal and recall process. It is therefore essential that we maintain contact with this group throughout the project's lifecycle and clearly explain the purpose of the project and proposed improvements as they arise.
- 6.2.3 We will keep regulators informed through quarterly updates which we will provide to organisations that represent this group such as CIEH, REHIS and TSI. We will also use the roll out of potential training to this group to explain the purpose of the review and if possible invite observations about the current process. We will work with FSS and devolved FSA offices to explore opportunities for the project to interact with regulators at a local level. Local authorities' views will be gathered through the externally commissioned research being undertaken by Kantar Public and through in depth cases studies being undertaken by the FSA.
- 6.2.4 Our aim is to make sure that regulators see this project as an opportunity to improve the current system for the benefit of consumers and themselves.

6.3 Industry

- 6.3.1 Industry (small, medium, and large retailers including manufacturers, wholesalers and distributors that supply the retail sector) are a key component in the withdrawal and recall process and this project aims to ensure they are aware of the project, support the project and have the ability to influence the development of improvements through representative bodies at ESG. We will provide ESG with updates at each quarterly meeting and provide an update bulletin between meetings to provide to their members on the progress of the project and how they can access further information.
- 6.3.2 We appreciate that not all retailers will be members of representative bodies, particularly small and medium sized retailers. We will look to place articles in trade magazines, attend trade fairs and develop digital / social media to contact these groups.
- 6.3.3 It is vital that through our communications, industry sees this project as benefiting them, helping to protect consumers and business.

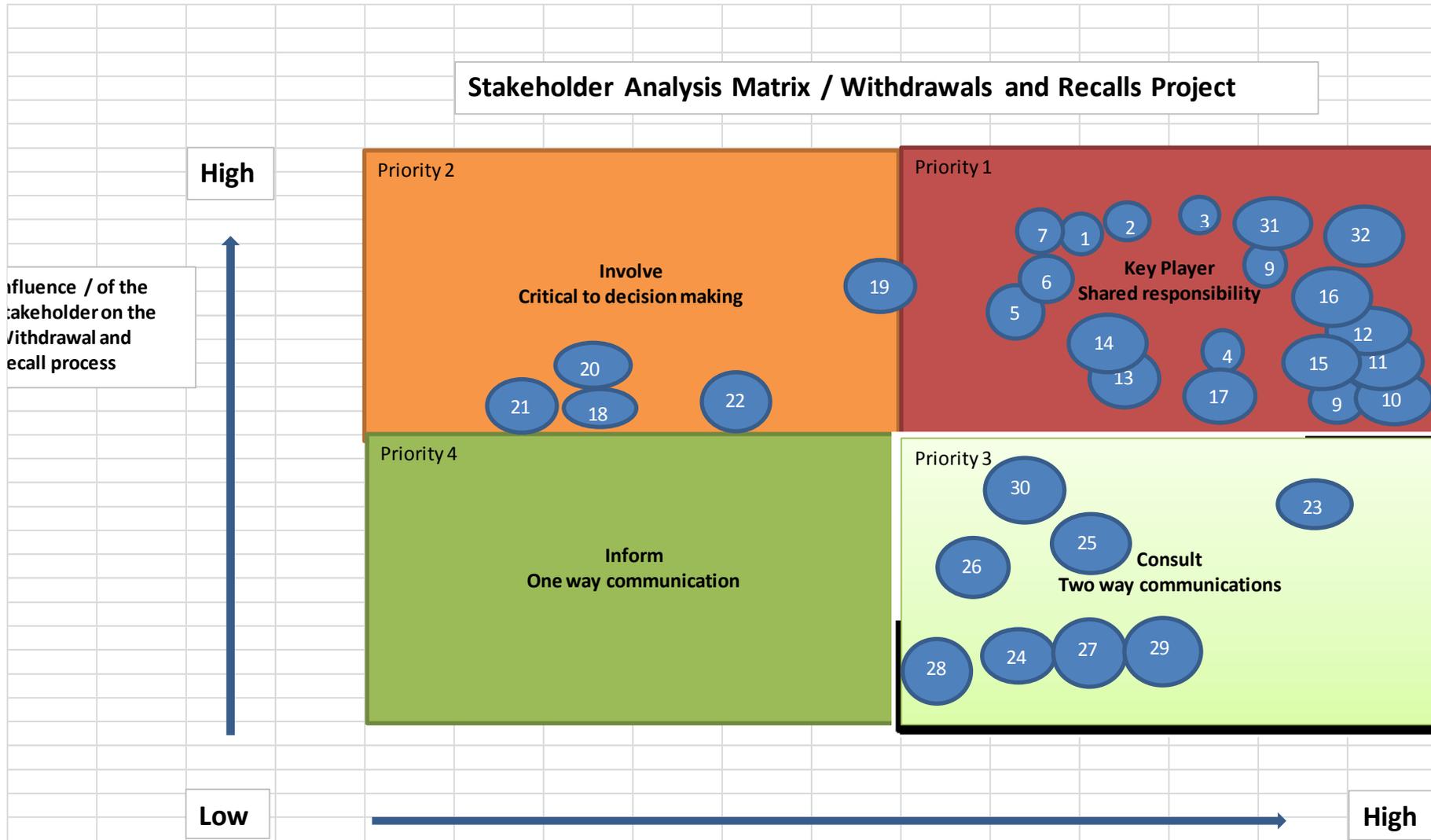
7.0 Implementation

- 7.1 We will implement this plan through development of a Communications and Engagement Action Plan that will capture our interaction with different stakeholders. The plan will be based around project milestones / known events and the need to keep stakeholders informed about the project.
- 7.2 The Action Plan will be reviewed by the Communications lead for the project and reviewed on a weekly basis by the Project Manager and project leads. Progress implementing the plan will be reported to the Project Board on a quarterly basis as part of the governance process.
- 7.3 The Communications and Engagement Action Plan is at Annex 2.

8.0 Evaluation / Indicators of Success

- 8.1 To ensure our plan is effective steps will be taken to evaluate the impact of communications and engagement with stakeholders and an evaluation plan will be developed which will be reported to the Project Board.

Annex 1 Stakeholder Analysis



**Interest and Impact of stakeholders on
the Withdrawal and Recall process**

Priority 1	Key Stakeholders Shared responsibility	Priority 2	Involve Critical to decision making	Priority 3	Consult Two way communication	Priority 4	Inform One way communication
1	Federation of Wholesale Distributors	18	Association of British Insurers	23	BIS Lynn Falls Team BIS Helen Buckingham		
2	Provision Trade Federation	19	Supermarkets Tesco Sainsbury's Asda M and S Aldi Morrison's Coop Waitrose Netto	24	Port Health		
3	Association of Convenience Stores			25	Food Storage Distribution Association		
4	Food and Drinks Federation			26	British Hospitality		
5	Chilled Food Association			27	Amazon Fresh		
6	British Frozen Food Association			28	Ocado		
7	Fresh Produce Consortium	20	Red Tractor	29	Consumers		
8	British Retail Consortium	21	Safe and Local Supplier Approved	30	FSA Colleagues		
9	Coeliac UK	22	BRC Global				
10	Anaphylaxis Campaign						
11	Allergy UK						
12	Which ?						
13	Association of Wholesale Distributors						
14	Federation of Small Businesses						
15	CIEH						
16	National Trading Standards Board Trading Standards Institute						
17	LA Representation						
31	EMT						
32	CB						

Annex 2: Communication and Engagement Action Plan

		Withdrawal and Recalls Communication and Engagement Plan							
		Consumers	Industry	Regulators	FSA	Key	Completed action		
							Project Event / Milestone		
November	1 Nov - 4 Nov	Article provided to the Guardian							
	7 Nov - 11 Nov			Contact Regulators who may be contacted by TNS					
	14 Nov - 18 Nov	Social media tweet to raise the profile of the project.					Project Board Meeting Interviews for SEO post		
	21 Nov - 30 Nov				Yammer message whole of company update - 30 Nov Yammer message whole of company appointment of SEO resource				
December	1 Dec - 9 Dec		1st ESRG bulletin issued 2 Dec ESRG provided with a brief to share with members 2 Dec				WG Meeting		
	12 Dec - 16 Dec			Arrange meeting with CIEH and TSI to explain the project and process for publishing an article in their journal Send update to regulators ref the project and possible contact from KP			Chief Exec updated 12 Dec		
	19 Dec - 23 Dec								
	26 Dec - 30 Dec			Potential Press article with CIEH / TSI					

January	2 Jan - 6 Jan		Trade article / project update					
	9 Jan - 13 Jan	ESRG meeting Provide Brief for circulation to members update following meeting	ESRG meeting Provide Brief for circulation to members update following meeting	ESRG meeting Provide Brief for circulation to members update following meeting	WG meeting Provide WG with Brief to update Departmental Directors ESRG meeting Yammer update to whole of company following ESRG meeting / make available the Analysis paper / Internation comparisons paper			
	16 Jan - 20 Jan			Meetings with Professional Bodies CIEH / TSI / REHIS				
	23 Jan - 31 Jan	Commission Food. Gov site Provide ESRG with a brief to circulate to members advising how to get to the site	Commission Food. Gov site Provide ESRG with a brief to circulate to members advising how to access the site	Commission Food. Gov site Provide ESRG with a brief to circulate to members advising how to access the site				
February	1 Feb - 3 Feb				WG Meeting			
	6 Feb - 10 Feb				Provide CEO with update			
	13 Feb - 17 Feb				Project Board meeting			
	20 Feb - 28 Feb							
March	1 Mar - 10 Mar	ESRG update	ESRG update	ESRG update	WG Meeting			
	13 Mar - 17 Mar							
	20 Mar - 24 Mar							
	27 Mar - 31 Mar							
April	3 Apr - 7 Apr				WG Meeting			
	10 Apr - 14 Apr							
	17 Apr - 21 Apr	Research Draft Report	Research Draft Report	Research Draft Report	Research Draft Report			
	24 Apr - 28 Apr							
May	1 May - 5 May							
	8 May - 12 May							
	15 May - 19 May							
	22 May - 31 May							
June	1 Jun - 9 Jun							
	12 Jun - 16 Jun							
	19 Jun - 23 Jun							
	26 Jun - 30 Jun							