

CONSUMER ENGAGEMENT MODEL

Executive Summary

1. This paper examines how the Agency should take forward its consumer engagement work. It proposes a new model for consumer engagement, taking into account the needs of individual consumers, consumer stakeholders and wider civic society.
2. The Board is invited to:
 - **note and comment** on the activity taking place in this area;
 - **agree** the proposed model for consumer engagement.

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Issue

1. At its December 2005 meeting, the Board agreed to discuss a paper outlining the Agency's new model (or approach) for engaging with consumers¹. This followed an 18-month discussion with the Board and the Executive about how best to take forward the Agency's work in this area.

Strategic Aim

2. We need to engage with consumers in order to 'put the consumer first' and to meet our strategic objectives. Additionally we need to continue to value the importance of consumer engagement as a means by which consumers can ask questions, seek connections and make suggestions for further research and evidence at the earliest stages of policy development.

Background

3. In December 2005 the Board agreed to discontinue the Consumer Committee so that the Agency could develop more creative and experimental ways of engaging directly with individual consumers and construct a new model for consumer engagement. During the last five years, the Agency has established extensive links with consumer stakeholders. By developing a new model for engagement it was envisaged that the Agency could also build more effective links with individual consumers and wider civic society².
4. Since January 2006 the Agency's Consumer Branch has been piloting innovative ways of reaching out to individual consumers. This resulted in the establishment of a People's Forum, made up of predominately low-income mums in Northern Ireland and holding 'You Speak, We Listen!' events in partnership with community food initiatives in Manchester, Dudley and Hartlepool. Better use was also made of new technology such as web-blogs/on-line discussion forums and regular meetings were held with regulators, other government departments and think tanks³.

¹ By consumers we mean individual consumers, including those that are 'hard to reach', consumer stakeholders and wider civic society.

² Civic society is defined as 'institutional forms [that] are distinct from those of the state, family and market, though in practice, the boundaries between state, civic society, family and market are often complex, blurred and negotiated. Civic society commonly embraces a diversity of spaces, actors and institutional forms, varying in their degree of formality, autonomy and power. Civic societies are often populated by organisations such as registered charities, development and non-governmental organisations, community groups, women's organisations, faith-based organisations, professional associations, trade unions, self-help groups, social movements, business associations, coalitions and advocacy groups'. (The London School of Economics, Centre for Civic Society, 2003).

³ Much of our current thinking was influenced by meetings with these organisations whose details are attached as part of Annex A

5. Demos, one of the leading think tanks in the UK was invited to produce a short paper focusing on what constitutes effective engagement, drawing on research from here and abroad. Their paper is attached as part of the appendices and explores how the Agency can further build its engagement work⁴. Where relevant we have drawn out references from the Demos paper and taken into account comments from the Advisory Committees of Scotland, Wales and Northern Ireland, that were all consulted as part of the development of this model.

Consumer Engagement Model

6. We propose that the Board considers the consumer engagement model in 3 parts:
 - Direct engagement with individual consumers
 - Engagement with consumer stakeholders
 - Engagement with 'hard to reach/hard to hear' groups

Direct Engagement with Individual Consumers

7. We know that direct engagement with individual consumers can be really valuable, as we've seen with our work on folic acid, signposting and GM. In these and other cases, groups of individual consumers are brought together to discuss specific policy issues and once they have reached a consensus or offered their views, these groups are then disbanded.
8. Demos suggest that we need to think differently about this type of interaction in the future and we need to think of what they refer to as 'public knowledge' in new ways:

"Different sorts of knowledge tell us different things. Some will give us answers, some will ask more questions, or make us rethink the question that we're asking...science can no longer rely upon unquestioned authority, it must be judged according to a broader set of questions....It is increasingly accepted within debates about science and society that people's knowledge, experience and values can provide valuable insights, both in terms of framing issues and questions, and in assessing and evaluating solutions⁵".

9. They go on to suggest that these very different forms of knowledge are often balanced against each other and that to do this misunderstands the value of consumer engagement.

"In recent years, government has placed greater emphasis on both 'evidence-based policy' and 'openness and transparency'. The former pushes for decisions based upon the best available (i.e. expert) knowledge. The latter requires a degree of participation from stakeholders and members of the public. Government departments have tried to iron out the apparent contradictions in this by suggesting that public and stakeholder engagement

⁴ See Annex B, 'Engagement, Evidence and Expertise (Jack Stilgoe and James Wilsdon, Demos 2006)

⁵ Ibid.

provides another addition to the body of evidence. This is a welcome move but misunderstands the value of public engagement....as with science, public engagement should not just be seen as a body of evidence...[but] can perhaps be understood under three headings: questions [that the public ask that are different from experts], connections [that the public make, i.e. political connections] and suggestions [thoughts about further research].

10. What Demos is arguing is that all these three headings provide legitimate reasons for why organisations should engage with individual consumers, even if it leads to further debate. One of the first steps in terms of developing a new model for engagement therefore is to have a richer, more meaningful dialogue with the public, which captures what consumers right across the UK are thinking and which seeks to understand what questions they want to ask and why. Currently, we have an ‘interrupted conversation’ with the public and we need to turn that conversation into real dialogue and debate. Demos also argue that its just as important to capture what the public know and information about the public and that if managed well and listened to effectively both can contribute to what they refer to as ‘socially-robust science’.
11. Any mechanism that we set up therefore should be about developing this dialogue. After seeking advice from COI [Central Office of Information], we believe that these mechanisms would work best if they were set up following the simple guidelines set out in the table below. For ease of reference, we’ve referred to these mechanisms as panels, but they would enable the Agency to enter into a longer-term conversation with individual consumers, drawing on the questions, comments and suggestions argument put forward by Demos.

Table 1

Food Standards Agency – Consumer Panels
<ul style="list-style-type: none">• 10 Panels to be established in England, Scotland, Wales and Northern Ireland.• Panels to include a broad section of the adult population of the UK.• Panels would consist of 12 respondents (120 people altogether) and would meet for 2 hours.• Meet at least three times a year (with the same respondents taking part in all three waves).

12. To ensure that these panels are effective, they should be managed and evaluated by independent contractors. These contractors would be responsible for:
 - Maintaining the panels and refreshing them each year with new respondents
 - Facilitating each group and ensuring that the Agency receives regular progress reports after each wave.

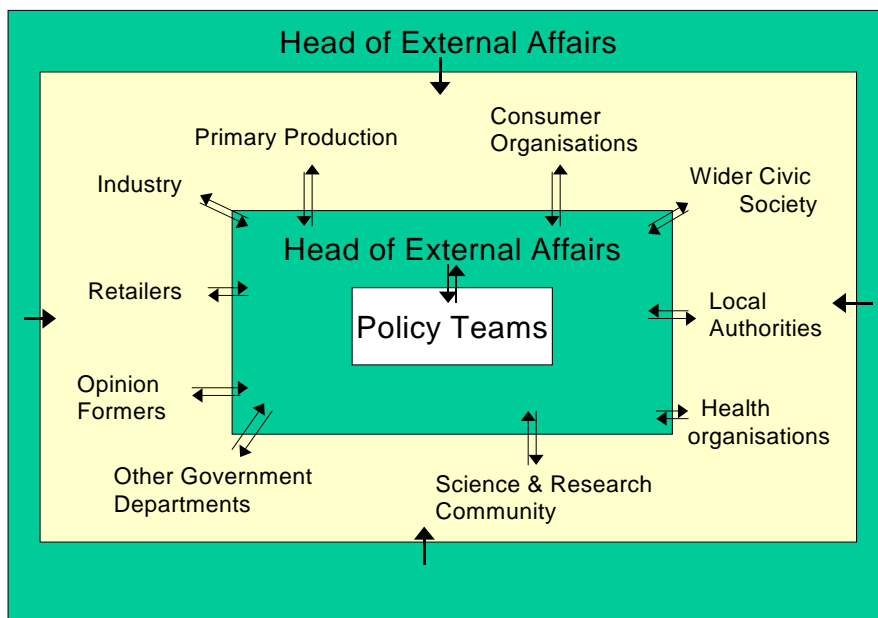
- Making use [where possible] of new technologies such as emails, ‘blogging’ and texting, enabling us to remain innovative in our approach.
13. To ensure that there are sufficient linkages with policy teams, an action plan should be developed in partnership with colleagues across the Agency, which identifies issues where the views of consumers are critical. This will then be used as basis from which we can construct our engagement work.
14. It’s important, as we’ve already stated that these mechanisms are about real dialogue and that they have the flexibility to discuss ad hoc issues that either consumers want to raise with us, or we need their views on. The difference with having a mechanism, like the panels in place, is that engagement will be undertaken in a more robust and managed way, complementing the Agency’s existing social and market research activity. Colleagues from policy divisions will also be able to make use of these mechanisms at all stages of the policy making cycle, placing consumer insight right at the heart of what we do⁶.

Engagement with Consumer Stakeholders

15. One of the key recommendations in the independent review of the Agency was that “the Agency should consider nominating a single point of contact across all issues for key stakeholders⁷”. This gap will be filled by the appointment of a new Head of External Affairs, whose main responsibilities will include:
- Providing a strategic overview of the Agency’s relationships with all its stakeholders.
 - Sharing knowledge of stakeholder activities across the Agency.
 - Ensuring that all contact with stakeholders is conducted in an open and accessible way and that minutes of all meetings for instance are placed on the Agency’s website.
 - Bringing stakeholders together through regular events to share information and exchange views.
16. The work of the Head of the External Affairs will be complex, as the diagram opposite shows. S/he will need to have an overview of all our stakeholder relationships as well as keep abreast of the needs of policy divisions and the demands of particular stakeholder groups. S/he will also need to bring stakeholders together, some of whom may have competing interests and to manage their differing expectations.
17. It’s worth stating that just because we’re employing a new Head of External Affairs, this will not mean that we are restricting the access of our stakeholders to the rest of the Agency. Stakeholders will continue to have access to the Chair,

⁶ This view is endorsed by the Government’s Communications Network [GCN] which has developed an ENGAGE programme, which puts consumer insight right at the heart of the policy making process and it being rolled out across Government.

⁷ Recommendation 8 of the 2005 Review of the Agency, (February 2005)



Deputy Chair, Chief Executive and other senior staff, including the officials that they usually deal with. As we've already stated, the Head of External Affairs will have a strategic, co-ordinating role, helping to share information about stakeholder activity right across the Agency and ensuring that we remain consistent in our messages and approach.

18. Demos have an interesting approach to stakeholders and their relationship to organisations and individual consumers.

"...it is easier than ever for unengaged members of the public to become interested stakeholders, and for passive consumers to become concerned citizens.... NGOs are increasingly realising that their own democratic mandates cannot be assumed, and are looking for new ways to connect directly with members of the public.... Consumer representatives can only reflect a fraction of the interests and understandings across society. Citizens, including scientists and regulators, have multiple identities. A consumer may also be a parent and farmer. A stakeholder may also be a scientist and suffer from diabetes. A socially-robust organisation needs to understand and tap into these complexities⁸".

19. The Head of External Affairs will need to be aware of these complexities and multiple identities and develop strategies for more continuous and informal contact with stakeholders [which they themselves have requested] and to ensure that we balance this with our openness agenda.

Hard to Reach/Hard to Hear Groups

20. The Agency needs to undertake further work with 'hard to reach/hard to hear' groups and develop greater partnership working with civic society. We also need to develop a clearer understanding of who these 'hard to reach' groups actually are and to move away from simple notions of segmentation based on gender and ethnicity to analysis based on social variation, difference and behaviour. Many organisations including possibly the new 'consumer voice' organisation have

⁸ Ibid.

identified hard to reach groups as some or all of the following - rural, disabled, elderly, ethnic minority, younger people, those on low incomes etc, perhaps our own analysis needs to go further.

21. COI's Common Good Research, which examined the views of the elderly and ethnic minority groups, confirmed what we already know, that not all elderly people think and behave in the same way. The COI research provided a useful analysis of the vast differences between those aged 50-70 to those aged 70+ and how income and life-style, status of the household make a huge difference to attitudes and behaviour. The same, as we've argued is true for ethnic minorities. Not all ethnic minorities are disadvantaged, some specific groups have a higher percentage of people on low incomes, but this is not true for all. Greater understanding about who is 'hard to reach' in relation to particular food issues, also needs unpicking, as this may not be the same sections of the population that other organisations have identified or indeed be the same groups for every issue.
22. We suggest that more research should be undertaken in this area to identify who is really 'hard to reach' and then develop action research studies with civic society to capture how best we can reach out to these various population sub groups.

Comments from the Advisory Committees

23. As we've already stated, all three of the Advisory Committees in Scotland, Wales and Northern Ireland were consulted on the new engagement model and the following three paragraphs summarise their comments.

Making use of Existing Networks

24. It was suggested that the Agency should continue to make better use of existing networks, for example, community led networks that have deep rooted and extensive links with their own communities. This and the importance of peer learning [i.e. people in the community acting as mentors and reaching out to more vulnerable groups of consumers] and making better use of existing NHS outpatients' services for example were raised as issues by the Northern Ireland and Scottish Food Advisory Committees respectively.
25. We are working hard to ensure [through our various award schemes] that we keep in close contact with what's happening at a local level. We are also continuing to provide opportunities for community food initiatives to come together to share practice and exchange information as well as find out more about the work we're undertaking.

Horizon Scanning

26. The Advisory Committee in Northern Ireland also raised the issue of horizon scanning and how the Agency could make use of horizon scanning techniques to understand the changing nature of the world within which we live and how this will affect consumers and their choices in relation to food. We will continue to

work with the horizon scanning team in the Agency and with Demos to take forward our work in this area.

Quality Assurance

27. It's vital that our work with consumers is as rigorous and robust as our scientific work and that there is some independent external challenge to the work we do. For our science based work, this external challenge is provided through the 9 scientific advisory committees that provide independent assurance to the Board on a range of scientific issues. Currently there is no such mechanism in place for our consumer work and to counteract this we suggest that the Board now considers setting up a similar independent 'audit mechanism' to advise on all consumer issues.

Advisory Committee on Consumer Engagement

28. We suggest that an Advisory Committee on Consumer Engagement is established whose main purpose will be to assure the Board that the Agency is making best use of all its consumer processes and is using consumer insight and evidence appropriately.

29. Our proposal is that this Committee should meet twice a year to discuss specific policy issues and that the Chair of the Committee should report back to the Board on an annual basis. This annual report back, should highlight gaps in consumer evidence and areas where the Agency needs to further improve the way in which it collects and interprets information

30. We also recommend that the Committee should be independent not only from the Executive but also from our stakeholders. This is to ensure that the Board receives impartial advice on our work with consumers.

31. Membership of the Committee could therefore consist of:

- Independent Chair [possibly appointed by the Board]
- Senior representative from a leading think tank
- Senior official from government who has extensive experience of engaging with the public
- Senior consultative relationship manager [drawn from the private sector, possibly from the financial/banking arena].

32. We recognise that some members of the Board are keen to have representatives from the various public health charities on the Committee. Whilst we acknowledge this as a concern, we also have to balance the need to establish a committee that is truly independent from our stakeholders, including the public health charities. We suggest therefore that the Board gives further consideration to 2 additional members, drawn from an umbrella voluntary organisation such as NCVO (National Council for Voluntary Organisations), which represents

thousands of voluntary organisations across the UK and a representative from a community food initiative, that work with some of the country's most socially deprived and disadvantaged consumers.

Social Sciences Research Committee

33. In addition to setting up the Advisory Committee on Consumer Engagement, we recommend that the Board should also consider setting up a separate Social Sciences Research Committee. As we've already stated, the 9 scientific advisory committees, advise the Agency on the scientific evidence that underpins and drives our work. They also provide an independent external challenge that is key to good science governance. By establishing a Social Sciences Research Committee, this will provide the Agency and ultimately the Board with the equivalent assurance and independent challenge in our social sciences work.

34. The Committee's Terms of Reference might include (amongst others):

- Providing independent expert advice to the Agency on the use of social sciences.
- Assisting the Agency in identifying gaps in knowledge and advising on appropriate social science research to address these gaps.
- Highlighting good practice from other organisations and departments which the Agency should make use of.

35. Our proposal is that the Committee would meet four times a year and would consist of:

- A leading and internationally respected academic as the Chair of the Committee
- A representative from the Government's Social Research Unit [based in the Treasury]
- Range of academics drawn from the social sciences.

36. We envisage that this Committee would be able to draw on additional expertise, e.g. from anthropologists, psychologists for example, who may not permanently sit on the Committee but who could be called upon to present their 'evidence' when invited by the Chair of the Committee. This is so that the Committee can make use of the best possible expertise without having all the different social sciences disciplines represented on the Committee.

37. This work will fall under the remit of the Agency's Chief Scientist and progress could be reported either via the Chief Scientist's annual report to the Board or separately via the independent Chair of the Committee.

Cost/Resource Implications

38. We believe in order to do this effectively £250,000 will need to be made available to set up the Panels, finance the action research studies and set up the committee. A paper will need to be presented to the EMB [Executive Management Board] setting out the exact costs and timescales.

Risks

39. There are a number of risks associated with all this work:

- Engagement mechanisms raise expectations and lead to greater confusion amongst individual consumers. (We will counterbalance this by being clear about what we are trying to do).
- Policy makers don't find the mechanisms robust or flexible enough. (We will counterbalance this by building in evaluation and working closely with the Chief Scientist and policy teams).
- Consumer stakeholders feel their access to policy officials is limited. (The new Head of External Affairs will need to ensure that this is not the case and that all the Agency's relationship with stakeholders, at different levels, are managed effectively).
- The Advisory Committee on Consumer Engagement and the Social Sciences Research Committee operate outside their Terms of Reference. (The Chief Scientist and the Secretariats will need to ensure that this is not the case).

Board Action

40. The Board is invited to:

- **note and comment** on the activity taking place in this area
- **agree** the proposed model for consumer engagement.

LIST OF MEETINGS WITH REGULATORS AND CONSUMER BODIES

- Passenger Focus
- OFCOM
- OFGEM
- Postcomm
- Energywatch
- Postwatch
- Human Embryology and Fertilisation Authority
- National Institute for Clinical Excellence
- Environment Agency