

Advisory Committee on Consumer Engagement: Report to the Food Standards Agency Board

December, 2008



**FOOD
STANDARDS
AGENCY**

REPORT OF THE ADVISORY COMMITTEE ON CONSUMER ENGAGEMENT TO THE FOOD STANDARDS AGENCY BOARD

EXECUTIVE SUMMARY

1. The Advisory Committee on Consumer Engagement was established at the start of this year, to provide the Board with an independent assessment of the extent to which the Agency is engaging effectively with consumers and to offer advice to Agency staff on how best to engage consumers on particular issues. This paper summarises the Committee's view of the Agency's current performance in this area, and makes a number of recommendations for the Board and management.
2. In undertaking this assessment, the Committee has spoken to around 25 members of staff from across the organisation, an extensive range of stakeholders in all four nations, and people from other public bodies that have also undertaken consumer engagement. We had a number of presentations from Agency staff on work which has involved some consumer engagement, such as signpost labelling and 'Scores on the Doors', as well as hearing about the engagement activity of Consumer Focus Wales and discussing new areas of work that might include consumer engagement in the future. We also reviewed returns on engagement activity which were submitted by each part of the Agency to the Consumer Branch.
3. In addition to our discussions with staff in the four nations, we were pleased to have the opportunity to discuss consumer engagement with the FSA Chair Deirdre Hutton, the Chief Executive Tim Smith and most senior managers during the course of the year. We were grateful for excellent support from the Consumer Branch in devising and undertaking our programme of work.
4. While we have succeeded in reviewing much of the varied work and activities of the Agency with regard to consumer engagement, inevitably this is something of a snapshot. We will examine further aspects of the Agency's work over the coming year but also drill down into some areas of engagement in more detail.
5. We found good examples of consumer engagement by the Agency, and we were struck by the commitment of individual staff to engaging consumers.
6. However the Committee concluded that engagement is not yet a fundamental part of how the Agency operates, with the major part of direct contact with consumers being handled by the Consumer Branch rather than the relevant content experts. Across the organisation, we observed a patchy knowledge and application of engagement approaches:
 - "Putting consumers first" is a widely-shared aspiration, although there is a temptation for it to be understood firstly as something the FSA does *for* consumers, rather than *with* them

- Consumer engagement is primarily seen as conveying information with a view to eliciting a response in terms of changed behaviour, rather than as a genuine two-way dialogue
 - Consumer engagement is perceived to be optional and so opportunities are missed and consistency is lacking
 - As a result, group plans refer infrequently to consumer engagement, suggesting a low level of priority
 - Consumer engagement is episodic as teams work to other priorities and sometimes bolt on some consumer engagement at a late stage
 - Stakeholder and group engagement has tended to occur more than direct consumer engagement
 - The Consumer Branch has coordinated an increasing amount of engagement activity, but other colleagues are less able to demonstrate how engagement activity has actually informed policy development
7. The Agency has a good record as an early adopter of deliberative techniques such as citizens' juries and has continued to use larger-scale citizen forums. In using such 'set-piece' approaches, the Agency puts itself ahead of many other regulators which are currently struggling with engagement or adopting a 'head in the sand' approach.
 8. However, the Board has set a very high standard in other areas such as governance and openness, where the Agency's performance is outstanding. The Agency will need to raise its game further if it wishes similarly to set the standard for others to follow in terms of consumer engagement. It currently lags well behind some other regulators in terms of the breadth and depth of engagement, while being ahead of others.
 9. We believe there is scope for the Agency to set the pace in terms of regulators' engagement with consumers, and that it would be right for the Agency to seek to become a world-class performer in this area, in line with its commitment to put the consumer first. Given its role in regulation at a European level, the Agency is in a position to champion engagement well beyond the domestic stage.
 10. This will require more overt Board leadership on this issue, more emphasis on engagement in inductions, training and performance management, and better assessment of what works and what doesn't. Engagement should become a core competency of the Agency and its staff, with a sophisticated approach to the complexity of different consumers' attitudes, needs and experiences. It is important that engagement activity is more than just the communication of Agency messages to consumers, and instead becomes a genuine two-way dialogue; and the approach to engagement needs to reflect the diversity of consumers themselves.
 11. Above all, the Agency should in our view aspire to take consumer engagement into the harder areas of decision-making. The most obvious area to do this in is corporate planning, where there is potential for real innovation to engage consumers in agenda-setting. We would encourage the Agency to understand and embrace fully the opportunity and need here.

12. This report touches on a number of detailed recommendations for action which we have made to the Agency's management. These include:

- Consumer Branch should keep a log of consumer engagement and the impact on policy decision-making, with successful examples publicised within the Agency and lessons drawn from less successful cases.
- There should be an assessment of total corporate spend on consumer engagement, including separate details of spending on engagement with disadvantaged and vulnerable consumers.
- The report template format for both the Executive Management Board and the Agency's Board should include a section on consumer engagement.
- There should be a clearer, shared understanding of what 'hard-to-reach' or 'disadvantaged and vulnerable' means for FSA projects, including a framework for evaluating engagement with these consumers over the longer-term.
- Opportunities should be explored for more collaborative work with other organisations connecting with vulnerable and disadvantaged groups.
- Recruitment, induction, training and performance management systems should promote consumer engagement.

13. We believe there could be scope for Consumer Branch to develop its role to support the implementation of these recommendations.

INTRODUCTION

14. The Advisory Committee on Consumer Engagement (ACCE) was established following Board consideration of the Consumer Engagement Model and the Westley Report in October 2006 and first met on 22 January 2008. The purpose of the Committee is to review and assess the Agency's consumer engagement work and to provide external assurance to the Board that the Agency's consumer engagement is following good practice.

The remit of the Committee is to:

- Review and assess the Agency's day-to-day consumer engagement activities¹;
- Advise the FSA on best practice in consumer engagement, drawing on experience within the Agency and outside it;
- Provide expert guidance to the Board or Executive on request on any other consumer engagement issues; and
- Prepare and submit to the Board an Annual Report on the performance of consumer engagement covering the above issues.

15. It is worth noting that the remit of the ACCE is to examine and comment on the engagement process but not the consumer policy outcomes of the work of the Agency.

16. To provide an evidence base, the Committee formally met three times in 2008, following an initial introductory meeting. The Committee has as part of its ongoing programme examined a selection of consumer engagement activity within the Agency: policy leads from the Agency have discussed with the Committee how and why they have engaged with consumers and the impact of this activity on policy development.

17. Committee members have also met several Divisional Heads, as well as other staff across all the nations, to help understand how policy is developed and to examine how consumer engagement has been used. These meetings were also strengthened by a desk exercise of reviewing Divisional Returns submitted to the Consumer Branch highlighting how and when consumer engagement has taken place and the impact it may have had on policy development.

18. The Committee met a substantial number of stakeholders in the four nations, heard from other public bodies undertaking engagement, and reviewed the emerging literature on engagement.

19. This activity has enabled us to form a judgment on the Agency's current approach to consumer engagement and make a number of recommendations to strengthen its work in this respect. Given the breadth of the Agency's work,

¹ By this we mean to examine the process of consumer engagement, the engagement methods used, the clarity of the objectives and the impact on policy development.

however, it should be acknowledged that this is inevitably something of a snapshot.

DEFINING ENGAGEMENT

20. There is no definitive statement that captures what is meant by consumer engagement; however words like ‘involvement’, ‘dialogue’ and ‘participation’ are all terms commonly used by a variety of organisations to describe interaction with members of the public.
21. At the Agency, consumer engagement is defined as being a two-way dialogue between a public body and UK consumers. In this process, consumers and public bodies come together in a deliberative way, actively listening to each other and understanding the different views and concerns that consumers may have. It can be carried out in various ways, from small in-depth deliberative panels to larger citizens’ juries and mass workshops.

“We must strive to understand the many voices of the public, and over the period of this Strategic Plan we aim to get in closer touch with local communities, to understand better the different circumstances, attitudes and lifestyles that affect what we eat. ...

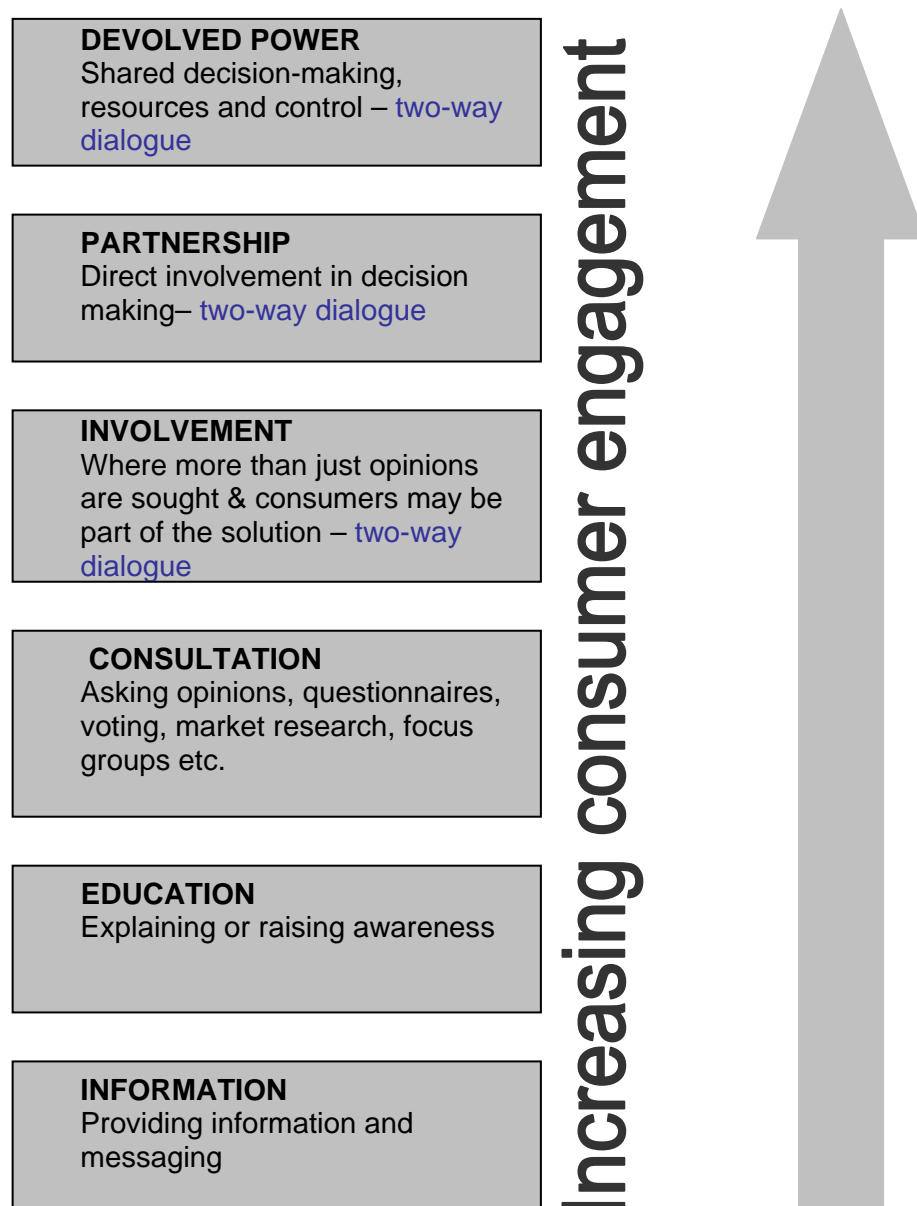
“We will continue to ... proactively seek the views of consumers and stakeholders. ...

“We will continue to form an independent view, actively seeking and taking into account the arguments and evidence from all our stakeholders, developing our dialogue with consumers and their representatives, particularly those that are disadvantaged or vulnerable. It also means that we will continue to reach our decisions openly, explaining them clearly to all those who are affected.”

FSA Strategic Plan to 2010 (Published 2007)

22. The methods and tools used for engaging with consumers by the Agency have varied depending on different factors, such as the issue being discussed, funding, timing etc. There are numerous models or classifications that can be used to distinguish the degree to which engagement is a two-way process or is primarily about cascading a message. Figure 1, below, illustrates this spectrum.

Figure 1: Spectrum of engagement (The Ladder of Engagement –Rob Angell 18/5/05)



EXPERIENCE OF OTHER ORGANISATIONS

23. During the course of the year, we drew on the experiences of other public bodies that have sought to engage people more effectively, as well as keeping the emerging literature in this field under review. We were particularly grateful to staff from the Human Fertilisation and Embryology Authority and the Arts Council England for providing an insight into what these organisations have done, and the lessons (both positive and negative) that the Agency could learn from them. Key success factors were considered to include:

- Board buy-in and senior-level sponsorship;
- Sufficient resources (money, time and expertise);
- A shared understanding that engagement is fundamental to the organisation's mission not merely an add-on;
- Engagement to be ongoing and embedded in the organisation's culture, rather than a one-off exercise;
- Direct dialogue between staff, Board members and consumers (and sometimes also people from the relevant sector), rather than findings simply being reported back by a research agency or consumer team;
- Recognition that there is rarely if ever such a thing as 'the consumer', instead a diverse range of people with different perspectives and needs; and
- Real commitment to act on the results of engagement

THE COMMITTEE'S FINDINGS

24. The Committee agreed that, in its first year, it should seek to understand relevant aspects of the organisational culture of the Agency and consider the extent to which consumer engagement is embedded within it.
25. The Committee's view is that the Agency's core engagement activity has had an emphasis on messaging and information provision, tending to be situated towards the lower end of the spectrum of engagement set out in Figure 1. This is discussed in more detail below.
26. However, there are instances where 'higher' types of engagement have taken place, including some cases of challenging two-way dialogue – see Figure 2, below, for some examples. We were impressed with the extensive programme of citizen forums, which explore issues in a deliberative way, and with plans for innovative eye-tracking research to explore how consumers actually read labels.
27. However, we concluded that the quality of consumer engagement is inconsistent across the organisation and that engagement itself is regarded as optional. We observed some scepticism about the relevance and value of engagement to the scientific work of the Agency, the Agency's role in EU negotiations and its policy-making in general. There needs to be a clearer analysis of where consumer engagement can add significant value. We also found confusion and/or lack of knowledge about how to define and then target 'hard to reach' consumers.

Figure 2: Examples of effective engagement

Discussion Groups on Atypical Scrapie

- These consumer discussions had two main aims, firstly to explore how consumers felt about the issues surrounding BSE & Atypical Scrapie in sheep & goats and secondly to help shape the advice that the Agency gave. This work was delivered against a background of the Agency being unsure of the potential risks as the evidence was not conclusive. The importance of consumer involvement in developing the Agency's advice was recognised and involving consumers and understanding their perceptions of the work of the Agency is a good demonstration of the more complex and difficult types of engagements.

School Council Network

- The meetings and discussions with young people helped the Agency shape its decisions on developing plans to inform and address concerns on young people suffering from an allergy. Engaging with young people before decisions were taken allowed the Agency to change its education approach and the provision of information. The Network has also been effective in providing a reality check on the school based food competencies work taken forward by Department for Children, Schools and Families and more general views that young people have towards healthy eating.

Citizens Forums

- The Agency's Forums demonstrate the Agency testing more innovative methods of engagement and involving consumers in two-way dialogue in developing policy. Seeking the views of consumers at the earliest stage of policy development and testing assumptions on consumer knowledge and understanding is welcomed. Having an open dialogue with consumers where they are able to shape the 'conversation' is acknowledged as being at the higher end of the spectrum but that benefits are recognised as being worth the investment.

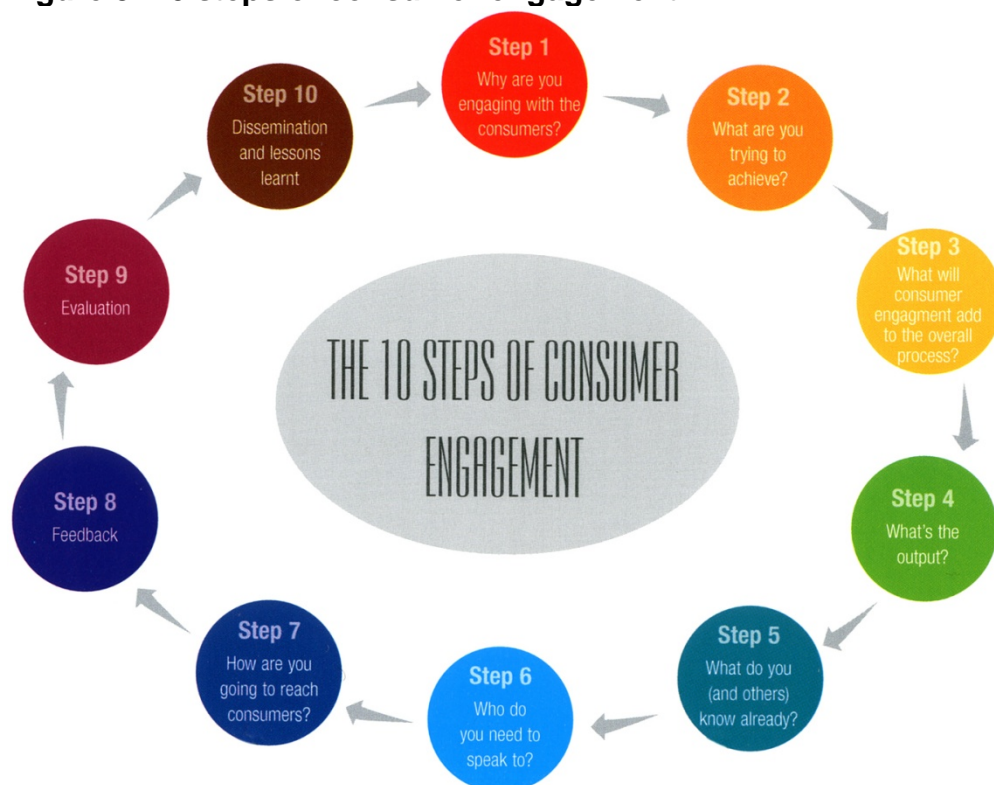
'Scores on the Doors'

- The piloting of different options for presenting environmental health information outside pubs and restaurants represented an innovative way of engaging consumers directly in the policy process. We were somewhat concerned that the evaluation of this exercise did not set out to identify the needs of different communities; nonetheless, this was a groundbreaking approach to practical policy development and one which other regulators might learn from.

DEVELOPING STAFF AWARENESS AND SKILLS

28. The Consumer Branch published 'How to put the consumer first' in October 2007. We commend the content of this guide, which is written in a plain and easy-to-use way, and includes the very useful '10 steps of consumer engagement' (see Figure 3, below).

Figure 3: 10 steps of consumer engagement



29. The guide was distributed to team managers across the Agency. We understand from our conversations with divisional staff that the guide was felt to be informative, but has been little used so far in practice. At least one division used the publication of the guide as a springboard to a discussion on consumer engagement, inviting a member of the Consumer Branch to present to the team. The Branch also briefed senior managers on its contents and purpose. While the document itself appears to have been little used so far by staff members, possibly because it was not given to everyone, it has succeeded in raising the profile of the Consumer Branch. We would suggest a renewed push on encouraging take-up of this useful Guide, with a copy provided to every staff member.

PERCEPTIONS OF CONSUMER ENGAGEMENT

30. In our review of documentation and our conversations with Heads of Division, we found a variety of perceptions about the relevance of consumer engagement to the FSA's work. In particular, we note the following five points:

(1) We have found a general feeling that, for many at the Agency, the *primary purpose* of engagement with consumers is to inform and educate them and to assure them of the FSA's professionalism, rather than to seek their involvement in policy development at the outset. This purpose is not wrong in itself. However, consumer engagement should go further than this. In the words of the recent NCC/Involve report, *Deliberative Public Engagement: Nine Principles* (2008, p. 12), effective engagement "creates better policy and service delivery options, grounded in better knowledge of public values and priorities". An organisation that truly puts consumers at the heart of all that it does should engage those consumers in shaping the strategic direction, policies and priorities of the whole organisation. In the 'spectrum of engagement' set out in Figure 1, above, 'information' and 'education' are at the low end.

The Agency's Guide, mentioned above, aims to help policy managers consider the level and quality of consumer engagement. In any particular project, the engagement methodologies (ranging from basic information provision to more participative and empowering decision-making) should be dictated by a clear view as to engagement's purposes and aims for that project.

(2) There appears to be some uncertainty as to whether consumer engagement is relevant to all of the scientific or regulatory work that the Agency carries out. In an organisation that, rightly, emphasises basing decisions on robust scientific evidence, it can be tempting to discount the often less tangible evidence gathered through consumer engagement exercises.

(3) While the Consumer Branch has coordinated an increasing amount of engagement activity and helped to disseminate this via the Agency's intranet, we found little evidence that consumer engagement had actually informed policy development in a systematic way.

(4) There has been a tendency to favour consultation with experts, stakeholders and special interest representative groups (e.g. Allergy UK, Women's Institute) over direct consumer engagement. We are pleased that the Agency's relationships with such groups appear to be healthy, but we would like to see more evidence in future of direct engagement informing decision-making.

(5) There has been relatively little direct dialogue between consumers and most Agency staff, with the relationship being mediated by Consumer Branch. We would like to see greater staff attendance at

research and engagement events, in order to allow more direct dialogue and to motivate and energise staff, connecting them with the purpose of the organisation.

STRATEGIC PLANNING

31. We were told that consumer engagement has not played a significant part in strategic planning in the past. We were pleased to learn that there is a firm intention for the next Strategic Plan to incorporate evidence from the consumer point of view and that the citizen's forums are due to be involved.
32. The Strategic Plan is the Agency's core document. We regard this current programme of engagement around the next Strategic Plan to be a crucial litmus test for how the Agency prioritises consumer engagement. We look forward to seeing the findings of the current process and we will be very interested in how consumer attitudes shape the Agency's next strategy. Specifically, we will be looking to see what consumer engagement or knowledge is used to influence priorities and resource allocation. We have been reassured that consultation will happen, but we are hoping to see consumer views on priorities shape the strategy alongside policy and scientific input.

POLICY DEVELOPMENT

33. Policy decisions are essentially made at two levels within the Agency. The more significant policies are determined by the Agency's Board. The Executive Management Board (EMB), comprising the Chief Executive and the Directors, determine many operational policies. Policy development tends to occur within teams, with consultation up and down the line management chain. Although we were told by all that working relationships and communication are good across the organisation, there is no formal way of policy development crossing directorate boundaries until firm recommendations are made to the EMB. Because of both this process and the fact that consumer engagement is effectively merely an option, it is possible that policy recommendations are made without consumer involvement.
34. We advocate a presumption that consumer engagement should apply in all policy development, unless specific projects can justify an exception to what should effectively be the default position.
35. To encourage earlier consideration of consumer engagement in policy development, we recommend that the report template format include a section on consumer engagement detailing (a) what engagement activities have occurred or are intended and what has been or is expected to be learned, *or* (b) why engagement has not occurred; *and* (c) what consideration has been given to vulnerable and disadvantaged consumers in taking this approach.

BUDGET

36. While there is a clear budget for Consumer Branch, budgets for specific pieces of work are (quite reasonably) held within the operating divisions. As a result, we found it difficult to assess the overall expenditure on consumer engagement and the extent to which this match strategic priorities. It would be useful to see a cross-organisation figure, with a breakdown for different types of engagement work.

EVALUATION

37. Evaluation of consumer engagement should be undertaken against clear and specific goals. Evaluation should be a two-stage process. First, an assessment of the process: for example, was the design and analysis of a survey valid, or did a representative number and range of people participate in an event? Second, an assessment of impact: what value has consumer engagement brought to the decision-making and how did it change Agency policies and delivery?
38. The Communications Directorate was able to supply some examples of effective evaluation of external communications work, such as the salt campaign. This covers impact on both the media and public opinion. However, our conversations with Agency managers and our review of divisional documentation found little evidence of widespread or thorough evaluation of consumer engagement, particularly in terms of impact on policy decisions. Our judgment is therefore that evaluation is patchy.

VULNERABLE AND DISADVANTAGED

39. The Agency has conducted some interesting engagement exercises with consumers who are often characterised as 'Vulnerable and Disadvantaged'. For example:
- Advice to Muslim scholars and imams on scrapie in sheep, to be communicated at Friday prayer gatherings.
 - Focus groups with low-income consumers were part of the evidence gathering process leading to the 'Eat well' website being established.
 - Discussions on healthy eating and understanding the barriers that young people 'not in employment, education or training' have was developed using a supermarket shopping trip exercise in Scotland.
 - Working with a Somali Community Development group in Cardiff, a two way dialogue engagement exercise took place to help develop work on healthier eating with communities that were not represented by the more traditional consumer stakeholder organisations.
 - Work alongside Fairbridge an organisation that focuses on young people who face multiple disadvantage issues, ranging from school

exclusion and homelessness to anti-social behaviour, crime and substance misuse. The Agency has expanded its knowledge base and gained some real insight into the lives of these consumers, which has helped in taking forward policy on a guide that will help young people living independently for the first time to eat healthier meals.

40. It was recognised by Agency staff that traditional public sector definitions of 'hard to reach' – e.g. around ethnicity, socio-economic group, age – were not always appropriate in the context of healthy and safe eating. However, they indicated that they needed assistance in defining 'hard to reach' for some of their projects.
41. The Consumer Branch told us that they had been developing non-traditional ways of segmenting consumers based on attitudes and then encouraging colleagues to consider which groups might be disadvantaged or affected by the specific policy area under discussion. More details are set out at Annex 4. We endorse this approach, but have yet to see tangible examples of how it is being used.
42. We would like to see the Agency forming more partnerships with organisations that have already connected in effectively to different sections of the community – the Agency need not reinvent the wheel in this respect. Such bodies might include NGOs, community organisations and local authorities.

RECRUITMENT, TRAINING AND PERFORMANCE MANAGEMENT

43. We were struck by the absence of consumer engagement in the Agency's core competencies used in recruitment, job descriptions and the Agency's guide to performance management. Consumer engagement scarcely features in induction training, with a short presentation and no literature. We have found no evidence of managers reinforcing these messages in local induction. We have not been able to assess whether personal targets or tasks have been set around consumer engagement.
44. We have made a number of recommendations to management to strengthen the presence of consumer engagement in recruitment, training and performance management.

THE FOUR NATIONS

45. In addition to our meetings in London, Committee members in Northern Ireland, Scotland and Wales met with FSA staff and stakeholders in those nations.

46. We found that direct communication with consumers is a high priority in Scotland and Wales in particular, though the position is perhaps less clear in Northern Ireland. Across the offices, we observed some impressive examples of how the Agency is getting its messages across to members of the public, with a visible presence at key community events and good connection to a range of community organisations.

47. However, this engagement tends to be at the lower end of the consumer engagement spectrum, with an emphasis on communicating existing messages. We would encourage Agency staff working on policy development from the London office to make the most of the opportunities presented by the community links held by the national offices. There could in addition be scope for stronger feedback loops from the national offices to policy staff.

RECOMMENDATIONS AND NEXT STEPS

48. We have already made a number of recommendations for action by the Agency's management. These include:

- Consumer Branch should keep a log of consumer engagement and the impact this engagement has had on policy development. Successful examples should be publicised within the Agency to demonstrate the value of engagement. Less successful examples should be evaluated to identify lessons to be learned. A formal cycle of meetings between the Branch and divisions to consider emerging issues should be considered.
- There should be an assessment of total corporate spend on consumer engagement, to enable the Agency to put a monetary value on its engagement activities. This should include separate details of spending on engagement with disadvantaged and vulnerable consumers.
- The report template format, for both the EMB and the Agency's Board, should include a section on consumer engagement detailing (a) what engagement activities have occurred or are intended and what has been or is expected to be learned, or (b) why engagement has not occurred; and (c) what consideration has been given to vulnerable and disadvantaged consumers in taking this approach.
- There should be a clearer, shared understanding of what 'hard-to-reach' or 'disadvantaged and vulnerable' means for Agency projects, including a framework for evaluating engagement with these consumers over the longer-term.
- Opportunities for more collaborative work with other organisations connecting with vulnerable and disadvantaged groups should be explored to find common areas and learn from one another, for example within health where there are many similarities.
- There should be a review of recruitment, induction, training and performance management systems to incorporate consumer engagement.

This should prompt more staff involvement in engagement activity, including attendance at consumer events.

49. We believe there could be scope for Consumer Branch to develop its role to support the implementation of these recommendations. It has an important advisory function, but some parts of the organization seem to have worked with it more effectively than others. Giving the Branch some responsibility for ensuring that colleagues deliver on this agenda, with Board backing and the remit to report periodically on divisions' performance, could place the Branch more clearly at the heart of how the Agency operates and so help ensure consumers are at the heart of the organisation.
50. We will return to these recommendations early in the New Year, to see whether there has been progress, and to revisit in more detail the issues we have raised, and to explore others. We also intend to examine the engagement work of the national offices in more detail in 2009.

ANNEX 1: COMMITTEE MEMBERS

Philip Cullum (ACCE Chair)	Deputy Chief Executive of Consumer Focus
Tom Horwood	Head of Communications and Policy at East Hampshire District Council
Liz Breckenridge	Freelance Marketing Consultant and Board Member of Consumer Focus
Claire Nicholson	Previously, Director of Performance and Planning at Sainsburys and Management consultant with PA Consulting.
Steve Garrett	Founder and Chair of the Riverside Community Market Association (RCMA) and a Director of RCMA Social Enterprise Ltd
Sharon Grant	Chair of London Travelwatch
Sue Seager	Marketing and PR Consultant
Timothy Hornsby	Consumer Council for Water Board Member and Chair of the Horniman Museum
Geraldine Campbell	Works in Regulation, Corporate Governance and stakeholder Engagement in the Public and Voluntary Sectors

ANNEX 2: STAFF CONSULTED

COMMITTEE DISCUSSIONS WITH AGENCY STAFF	
FSA Chair	Dame Deirdre Hutton
Chief Executive	Tim Smith
Chief Scientist and Directory of Food Safety	Andrew Wadge
Director of Consumer Choice and Dietary Health	Gill Fine
Director of Communications	Terrence Collis
Director of Strategy and Resources	Richard Calvert
Director of FSA Wales	Steve Wearne
Strategic Policy and Consumer Engagement – Scotland	Bill Adamson’s Team
Assistant Director - N. Ireland	Maria Jennings
Head of the Microbiological and Safety Division	Dr. Judith Hilton
Head of Nutrition Division	Rosemary Hignett
Head of Social Sciences	Jane Barrett
Team Leader, Strategy and Planning Team	Dr Sharn Bowen
Local Authority Liaison Division	Catriona Stewart
Head of Primary Production Division	Tim Foster
Head of Enforcement Support Division	Sarah Appleby
Head of Novel Foods, Additives and Supplements Division	Clair Baynton
Head of Labelling, Standards and Allergy Division	Michael Wight
Head of Food Protection Division	Nick Tomlinson
Consumer Choice Officer – N. Ireland	Andrea Marnoch
Communications Officer – N. Ireland	Elaine Doherty

ANNEX 3: STAKEHOLDERS CONSULTED

Nation	Stakeholder Organisation
Scotland	<ul style="list-style-type: none"> • Community Food and Health • Scottish Salmon Producers Organisation • Scottish Childminding Association • Scottish Rugby Union • Aberdeen Foyer • Community Food Development worker - NHS
Wales	<ul style="list-style-type: none"> • Cardiff Council - Head of Community Dietetics, Community Dietician, Food and schools Coordinator, Local Food and Nutrition Teacher • Regional Officer - Rural Regeneration Unit • Chair of Local Food Co-op • Farmer's Union of Wales • National Federation of Women's Institutes • Organic Centre Wales • NFU Cymru • Welsh Beekeepers Association
Northern Ireland	<ul style="list-style-type: none"> • Chest , Heart and Stroke Association • The Simon Community (S.C.): • Northern Ireland Council for the Homeless (NICH): • Age Concern • Belfast Trust Community health and Dietetics service • Community Health Development Network • Duncairn and New Lodge Healthy Living Centre

ANNEX 4: DISADVANTAGED AND VULNERABLE CONSUMERS

The Agency has developed a new approach for engaging with disadvantaged and vulnerable consumers in order to be more effective at meeting the core value of “Putting the consumer first.” This approach recognises that the traditional consumer groups are not homogenous and helps to develop greater insights into which sections of the population are really disadvantaged and vulnerable.






They have defined ‘disadvantaged’ consumers as groups of consumers that have been traditionally excluded from policy making (i.e. consumers on low incomes, ethnic minorities, rural consumers etc). Vulnerable referred to those consumers that might have particular needs at different life stages (i.e. children, young people, pregnant women etc). Of course, there’s likely to be some overlap between these two different groups, so a flexible and pragmatic approach has been incorporated in reaching consumers (whether they are disadvantaged and vulnerable or both) that are most in need.

We agree with the current approach that has been proposed, which is based on not stereotyping consumers but gaining deeper understanding about their complex relationship to food. This was illustrated by looking at an issue like healthy eating where traditionally, the Agency’s approach might have relied upon getting messages across to the priority groups (black and minority ethnic communities, young people, rural consumers and those on low incomes). But looking at this issue in terms of the new approach, consumers could be segmented based on their attitudes (see Figure 1, below).

The ACCE feel that this type of segmentation will help the Agency to gain a fuller understanding of why healthy eating might be more of an issue to some sections of the population than others². Ultimately, this will help to inform the FSA as to how it will be best to communicate with vulnerable and disadvantaged consumers.

² Taken from the key driver analysis of the 2006 Consumer Attitudes Survey.

Figure 1: Segmenting Vulnerable and Disadvantaged Consumers on the Basis of Attitudes

<p>Health Conscious Pragmatists</p>  <p>More likely to be:</p> <ul style="list-style-type: none"> • Female • Living in an urban area • Retired (marginal) <p>Feel that:</p> <ul style="list-style-type: none"> • Healthy Eating is very important • Parents should be strict and make their children eat healthy food • Eating healthily is very important • Convenience food is not that bad for you • It is not difficult to know if a food is healthy from the labelling • They would not like to have more info about food they buy 	<p>Convenience Driven Health Rejectors</p> <p>More likely to be:</p> <ul style="list-style-type: none"> • Male • Younger (16-25) • Lower social grade (DE) <p>Feel that:</p> <ul style="list-style-type: none"> • More likely to think it is too expensive to cook healthy meals • Convenience food is not that bad for you • Not important that families sit down together for meals • Less likely to think parents should make children eat healthy food • Eating healthily is not very important • Do not enjoy or make time for cooking  
<p>Concerned Health Advocates</p> <p>More likely to be:</p> <ul style="list-style-type: none"> • Aged 36 to 65 years • From an ethnic minority group <p>Feel that:</p> <ul style="list-style-type: none"> • Find it difficult to know if a product is healthy from the labelling • Would like to have more information about the food they buy • Are really concerned about food safety and hygiene • Think parents should make children eat healthy food • Eating healthily is very important 	<p>Traditional Cooking Enthusiasts</p> <p>More likely to be:</p> <ul style="list-style-type: none"> • Female • Married • White • Higher social grade <p>Feel that:</p> <ul style="list-style-type: none"> • Really enjoy cooking • Make time to cook proper meals • Enjoy watching cooking programmes on TV • Do not find it difficult to find healthy alternatives that taste nice • Think that convenience food is bad for you • Think it is important that families sit down together for meals 