

## **Annex**

### **Request**

*I would like to request a copy of all of emails received by Heather Hancock, chairman of Food Standards Agency, during the month of February in the year 2019.*

### **Response**

The information in response to your request has been provided in Annex C and also some information has been attached to the covering email. You will note that some of the information in scope of your request has been withheld from disclosure under section 22A (research), section 31 (law enforcement), section 35 (formulation or development of government policy), section 36 (prejudice to the effective conduct of public affairs), section 40 (personal information) and section 43 (commercial interests) of the Act.

Annex B provides further details about our use of these exemptions.

**Annex C - Information disclosed under FOI 2399 – Emails received by Heather Hancock in February 2019**

**Email 1**

**From:** Colin Sullivan  
**Sent:** 27 February 2019 08:04  
**To:** Heather Hancock <heather.hancock@food.gov.uk>  
**Cc:** David Self <david.self@food.gov.uk>  
**Subject:** [s36]  
**Importance:** High

Morning Heather,

Ahead of the discussion later this morning, please find attached first draft of [

s36

]

Thanks,  
[S40]

[S40] | Personal Secretary to Colin Sullivan - Chief Operating Officer  
Corporate Support Unit  
Food Standards Agency  
Tel: [S40]

**ATTACHMENT** – Information withheld under section 36 of the Freedom of Information Act 2000

## Email 2

**From:** Jason Feeney

**Sent:** 20 February 2019 19:03

**To:** Heather Hancock <heather.hancock@food.gov.uk>

**Subject:** FW: National Audit Office Value for Money study on food regulation 20/02 update

H

We appointed Alice to lead on this review from our side and as you can see she's doing an excellent job.

Thought you might like to see where they are probing.

[ s36

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[s36]

J



**Jason Feeney CBE**

Chief Executive Officer

Food Standards Agency, 7<sup>th</sup> Floor, Clive House,  
70 Petty France, London SW1H 9EX

020 7276 [s40]

**From:** Alice Biggins

**Sent:** 20 February 2019 18:44

**To:** Jason Feeney <[jason.feeney@food.gov.uk](mailto:jason.feeney@food.gov.uk)>; Christopher Hitchen <[Chris.Hitchen@food.gov.uk](mailto:Chris.Hitchen@food.gov.uk)>; Maria Jennings <[maria.jennings@food.gov.uk](mailto:maria.jennings@food.gov.uk)>; Michael Wight <[Michael.Wight@food.gov.uk](mailto:Michael.Wight@food.gov.uk)>; Darren Davies <[Darren.Davies@food.gov.uk](mailto:Darren.Davies@food.gov.uk)>; Simon Dawson <[Simon.Dawson@food.gov.uk](mailto:Simon.Dawson@food.gov.uk)>; Michael Jackson <[michael.jackson@food.gov.uk](mailto:michael.jackson@food.gov.uk)>; Catherine Bowles <[Catherine.Bowles@food.gov.uk](mailto:Catherine.Bowles@food.gov.uk)>; Julie Pierce <[Julie.Pierce@food.gov.uk](mailto:Julie.Pierce@food.gov.uk)>; Colin Sullivan <[Colin.Sullivan@food.gov.uk](mailto:Colin.Sullivan@food.gov.uk)>; Steve Wearne <[Steve.Wearne@food.gov.uk](mailto:Steve.Wearne@food.gov.uk)>; Guy Poppy <[Guy.Poppy@food.gov.uk](mailto:Guy.Poppy@food.gov.uk)>; Rod Ainsworth <[Rod.Ainsworth@food.gov.uk](mailto:Rod.Ainsworth@food.gov.uk)>

**Cc:** [s40]; [s40]; [s40]; Steven Pollock <[Steven.Pollock@food.gov.uk](mailto:Steven.Pollock@food.gov.uk)>; [s40]; [s40]; [s40]; [s40]; Michelle Patel <[Michelle.Patel@food.gov.uk](mailto:Michelle.Patel@food.gov.uk)>; [s40]; David Self <[david.self@food.gov.uk](mailto:david.self@food.gov.uk)>; [s40]

**Subject:** RE: National Audit Office Value for Money study on food regulation 20/02 update

Dear all,

A good couple of interviews with the NAO today. Thanks to Julie and Michael for very clear and interesting sessions. [s40] will circulate a full note of both meetings, headlines are below.

**Pre-meeting** (Alice and [s40] NAO)

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**General points**

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**Julie Pierce interview (Julie, Alice, [s40], NAO)**

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**Michael Wight interview (Michael, Alice, [s40], [s40], NAO)**

- [

S36

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I'm on leave now until [s40] but am contactable on my mobile ([s40]).

Best regards,

Alice

**From:** Alice Biggins

**Sent:** 19 February 2019 16:53

**To:** Jason Feeney <[jason.feeney@food.gov.uk](mailto:jason.feeney@food.gov.uk)>; Christopher Hitchen <[Chris.Hitchen@food.gov.uk](mailto:Chris.Hitchen@food.gov.uk)>; Maria Jennings <[maria.jennings@food.gov.uk](mailto:maria.jennings@food.gov.uk)>; Michael Wight <[Michael.Wight@food.gov.uk](mailto:Michael.Wight@food.gov.uk)>; [s40]; Simon Dawson <[Simon.Dawson@food.gov.uk](mailto:Simon.Dawson@food.gov.uk)>; Michael Jackson <[michael.jackson@food.gov.uk](mailto:michael.jackson@food.gov.uk)>; Catherine Bowles <[Catherine.Bowles@food.gov.uk](mailto:Catherine.Bowles@food.gov.uk)>; Julie Pierce <[Julie.Pierce@food.gov.uk](mailto:Julie.Pierce@food.gov.uk)>; Colin Sullivan <[Colin.Sullivan@food.gov.uk](mailto:Colin.Sullivan@food.gov.uk)>; Steve Wearne <[Steve.Wearne@food.gov.uk](mailto:Steve.Wearne@food.gov.uk)>; Guy Poppy <[Guy.Poppy@food.gov.uk](mailto:Guy.Poppy@food.gov.uk)>; Rod Ainsworth <[Rod.Ainsworth@food.gov.uk](mailto:Rod.Ainsworth@food.gov.uk)>

**Cc:** [s40]; [s40]; [s40]; Steven Pollock <[Steven.Pollock@food.gov.uk](mailto:Steven.Pollock@food.gov.uk)>; [s40]; Emma

Peleshok <[Emma.Peleshok@food.gov.uk](mailto:Emma.Peleshok@food.gov.uk)>; [s40]; [s40]; Michelle Patel <[Michelle.Patel@food.gov.uk](mailto:Michelle.Patel@food.gov.uk)>; [s40]; David Self <[david.self@food.gov.uk](mailto:david.self@food.gov.uk)>

**Subject:** National Audit Office Value for Money study on food regulation

Dear all,

I've been asked to be the FSA main contact for the NAO Value for Money study into food regulation. I've been delighted to find that everything so far has been impeccably organised, which is helping me get up to speed. Thank you to everyone who has submitted information and documents. We have started transferring this to the NAO now that we have agreed a secure method to do so.

The NAO start their interviews tomorrow, and over the next few weeks are seeing Julie Pierce, Michael Wight, Darren Davies, Simon Dawson, Michael Jackson, Jason Feeney and Chris Hitchen. I'll be attending every interview as well, along with [s40] who will be taking a note for us.

I'm arranging regular catch-ups with the NAO audit manager, and will provide regular updates to this distribution list – please let me know if there's anyone I've missed.

The attached presentation sets out the NAO's proposed scope and approach. The diagram below helpfully sets out the key questions they're hoping to answer through the exercise. Over the next few days I'll be making sure the evidence we give them through interviews and the documents we submit are sufficient to answer those questions – I may be coming to ask you for help with this. I won't be share anything with the NAO unless I have specifically cleared it with you – and [s40] will remain the conduit for information going to the NAO, so please continue to keep her in copy. It may be that once I've had more of a chance to think about it and talk it over with various of you, we decide that we need to put together something overarching that sets out how we work, and work with others, so they have the answers to their questions in one handy document.

[

S36

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Best regards,

Alice

Joint Head of EU Exit, Regulatory & International Strategy Unit

Strategy, Legal and Governance Directorate

Food Standards Agency

7<sup>th</sup> Floor, Clive House, 70 Petty France SW1H 9EX

[alice.biggin@food.gov.uk](mailto:alice.biggin@food.gov.uk)

[www.food.gov.uk](http://www.food.gov.uk)

Working pattern: Monday-Wednesday

**Email 3**

**From:** David Self  
**Sent:** 20 February 2019 16:43  
**To:** Heather Hancock <heather.hancock@food.gov.uk>  
**Subject:** FW: Small business survey

FYI, some highly useful stats.



**Dr David Self**  
Head of Private Office

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T: 020 7276 [s40]

M: [s40]

Floor 7, Clive House, 70 Petty France, London, SW1H 9EX  
[david.self@food.gov.uk](mailto:david.self@food.gov.uk)

**From:** Steven Pollock  
**Sent:** 20 February 2019 16:38  
**To:** [s40]  
**Cc:** David Self <[david.self@food.gov.uk](mailto:david.self@food.gov.uk)>  
**Subject:** Small business survey

Hi [s40],

We've got the information from the first report of our [

S22A

]

Regards

**Steven Pollock**

Director of Communications

Food Standards Agency

[Steven.pollock@food.gov.uk](mailto:Steven.pollock@food.gov.uk)

020 7276 [s40]

[s40]

**ATTACHMENT** – Information withheld under section 22A of the Freedom of information Act 2000

#### **Email 4**

From: surveys@ysc.com <surveys@ysc.com> On Behalf Of ysconline@ysc.com

Sent: 14 February 2019 12:07

To: Heather Hancock <heather.hancock@food.gov.uk>

Subject: For action: SCS 360° feedback request(s) by 31 March 2019

SCS 360° Performance Management Tool

Dear Heather,

You have been nominated by the following to provide your view of their leadership behaviours relative to the Civil Service Leadership Statement:

1. Christopher Hitchen
2. Jason Feeney
3. Steve Wearne

This is very important developmental feedback for the individual(s) so please give your honest assessment. You can be assured that all responses will be collated anonymously, unless you are providing a self-review, or are the individual's Line Manager, where it will be clear that the feedback is from you.

Please complete the survey(s) by 23:59 on 31 March 2019. A survey does not need to be completed in one sitting.

The survey will take around 25 minutes to complete and the instructions at the beginning of the survey will provide you with guidance on how to complete the process.

Login: [s31]

Username: [s31]

Initial Password: [s31]

You will be prompted to change your password when you first login. Please make a note of this new password as you will need this to log into your development home page in the future.

Respondent Guidance is attached to this e-mail.

We look forward to receiving your feedback. Thank you for your participation.

Kind regards,

YSC

For 24hr (Monday – Friday) assistance please contact [ysconline@ysc.com](mailto:ysconline@ysc.com)

**ATTACHMENT – 360 Feedback Respondent guidance** – Attached to covering email

## Email 5

**From:** Jason Feeney  
**Sent:** 13 February 2019 11:46  
**To:** Heather Hancock <heather.hancock@food.gov.uk>  
**Cc:** David Self <david.self@food.gov.uk>  
**Subject:** FW: FOR INFORMATION: Draft paper on transparency in risk management for Strategic Food Safety Dialogue meeting

H

Some travel/train reading from Steve that he'll be using at Nice in a couple of weeks.

J



**Jason Feeney CBE**

Chief Executive Officer

Food Standards Agency, 7<sup>th</sup> Floor, Clive House,

70 Petty France, London SW1H 9EX

020 7276 [s40]

**From:** Steve Wearne  
**Sent:** 11 February 2019 17:41  
**To:** Jason Feeney <[jason.feeney@food.gov.uk](mailto:jason.feeney@food.gov.uk)>  
**Cc:** Rod Ainsworth <[Rod.Ainsworth@food.gov.uk](mailto:Rod.Ainsworth@food.gov.uk)>; [s40]; [s40]  
**Subject:** FOR INFORMATION: Draft paper on transparency in risk management for Strategic Food Safety Dialogue meeting

Jason,

I wanted to share with you the attached short paper which I have been asked to prepare to stimulate a discussion on transparency in risk management at the annual Strategic Food Safety Dialogue meeting, which will bring together senior delegates from the EU and Quads in the margins of GFSI in two weeks' time. This aims to be both topical and to provoke some open discussion between attendees, while setting out our own stall with regards to domestic risk analysis and championing the position we and the Board are taking on issues such as "other legitimate factors". I'm also hoping to demonstrate some national and personal thought leadership, with one eye to showing my general competence for the Codex Chair job in 2020.

I'll also be sharing in advance with the Codex Chair, Vice-Chairs and Secretariat, and with Matthew Hudson (a UK national) who has just replaced Michael Scannell as Director of DG Sante Directorate D (Food chain stakeholder and international relations). Matthew's remit will include Codex matters and he too will be at GFSI so I'm hoping to use this as an early opportunity for an initial meeting.

Happy for you to also share with Heather, as it provides some useful wider context for the next discussion by the Board of risk analysis.

Steve.

Steve Wearne  
Director of Science  
Food Standards Agency  
Floors 6 & 7, Clive House  
70 Petty France  
London SW1H 9EX

T: +44 (0)20 7276 [s40]

M: [s40]

**ATTACHMENT** – Strategic food safety dialogue "Transparency in risk management"  
– A Stimulus for discussion – **Attached to covering email**

**Email 6**

From: surveys@ysc.com <surveys@ysc.com> On Behalf Of ysconline@ysc.com

Sent: 11 February 2019 12:10

To: Jason Feeney <jason.feeney@food.gov.uk>

Cc: Heather Hancock <heather.hancock@food.gov.uk>

Subject: Confirmation of Nominations - SCS 360° Performance Management Tool

SCS 360° Performance Management Tool

Dear Jason, (CC Line Manager)

Thank you for submitting your respondent details. On the survey launch date, 14 February 2019, the people listed below will be invited to provide you with feedback:

1. Heather Hancock (Line Manager)
2. Chris Hitchen (Reports)
3. Colin Sullivan (Reports)
4. Julie Pierce (Reports)
5. Maria Jennings (Reports)
6. Michael Wight (Reports)
7. Rod Ainsworth (Reports)
8. Steve Wearne (Reports)
9. Guy Poppy (Others)

Please review your list and contact ysconline@ysc.com if any of the information appears to be incorrect, or if any changes are required.

All nominees will receive an email from YSC Online with a link to the feedback questionnaire. You can monitor response rates by logging on to your YSC Online homepage and clicking on the Manage Survey button. To ensure respondent confidentiality, response rates will be aggregated.

Login: [s31]

Username: [s31]

Password: If you need, you can request a new password using the Reset Password link on the login page.

Kind regards,

YSC

For 24hr (Monday – Friday) assistance please contact ysconline@ysc.com



## **Email 7**

**From:** Tim J Smith [s40]

**Sent:** 06 February 2019 15:34

**To:** Heather Hancock <heather.hancock@food.gov.uk>

**Cc:** Jason Feeney <jason.feeney@food.gov.uk>

**Subject:** Pret follow up

Dear Heather,

Good to see you last week. I'm just back from Washington where I'm pleased to say **[s43]**.

Attached for your interest is a speech I delivered this morning at a Food To Conference.

My key points were:

- \* Don't wait for regulation – give consumers the best information possible for them to make their choice.
- \* Be inclusive – help allergen sufferers not impede them
- \* For Pret that is full ingredient labelling
- \* Don't fall into the trap of precautionary allergen labelling
- \* We need a register of allergen deaths and near misses.

Happy to come in and discuss

Best

Tim

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**ATTACHMENT - Tim J Smith – MCA Food-to-Go Conference 6 February 2019**

***“Helping every Consumer make the right choice”*** – Attached to covering email

## **Email 8**

**From:** David Self

**Sent:** 04 February 2019 18:05

**To:** Heather Hancock <heather.hancock@food.gov.uk>

**Subject:** Letter to/from VG

Here's Gething's letter, and I've managed to dig up the final draft of the letter you sent to him.

Dr David Self

Head of Private Office

Food Standards Agency

020 7276 [s40] / [s40]

[david.self@food.gov.uk](mailto:david.self@food.gov.uk)

**ATTACHMENT 1** – Information withheld under section 40 (personal information) of the Freedom of information Act 2000.

**ATTACHMENT 2** – Information withheld under section 40 (personal information) of the Freedom of information Act 2000.

## **Email 9**

**From:** [s40]

**Sent:** 27 February 2019 11:49

**To:** Heather Hancock <heather.hancock@food.gov.uk>

**Subject:** Farewell

Dear Heather

As you know I'll be leaving the Agency very shortly and I just wanted to say a proper goodbye. It has been an absolute pleasure and a privilege working in the FSA with you as our Chair. I am especially grateful that you showed such a genuine interest in, and commitment to, animal welfare which made it possible for the welfare team to achieve what it has done. I will always look back on my time in the FSA as the best in my career history and this is, in some part, due to your leadership. And I'm so pleased to be leaving the welfare team in such excellent hands. I couldn't have handed the reins over to anyone better than our friend and colleague [s40] from Eville & Jones who has already hit the ground running.

Whilst I may be changing career direction, I'm not giving up my passion for animal welfare and expect to stay active in this area on a voluntary basis, especially in relation to non-stun slaughter, so our paths may cross again in future.

So, thank you for your support and I wish you all the very best for the future,

[s40]

[s40]

Food Standards Agency

Email: [s40]

Mobile: [s40]

## **Email 10**

**From:** David Self  
**Sent:** 18 February 2019 17:18  
**To:** Heather Hancock <heather.hancock@food.gov.uk>  
**Cc:** S40; S40; S40  
**Subject:** Regulated products

Heather,

Private Office had a first stab at finding the state of affairs regarding highly regulated food products in Canada, Australia, New Zealand and the USA. Hopefully this is some interesting reading for you, and let us know if you'd like us to do more digging.

Thanks,

David

### **Canada** (David)

While the situation is heavily devolved, municipal codes and provincial acts across Canada have stipulated the safe temperature for a burger to be cooked to in FBOs, is 71 degrees (8 degrees above what is accepted as medium rare). And there is no recourse to serving rare burgers there – restaurants found to be serving rare burgers are invariably given a fine and only given conditional passes for food hygiene inspections. Over the past years several US states have been requiring FBOs to cook their burgers to a minimum of 68 degrees. The number of countries that allows for rare burgers (without any oversight) appear few and far between.

The sale or supply of raw drinking milk is prohibited in Canada. On Jan. 5, 2018, Justice P. W. Sutherland of Ontario's Superior Court of Justice imposed an injunction in a case called Downing v. ARC. Downing is the provincial Milk Act Director, while ARC is an incorporated farm co-op that allegedly was distributing raw milk, but has now closed down its milk operation. In essence, the decision transformed an action that was previously a provincial regulatory offence punishable only by fines — distributing raw milk — into a federal crime punishable by up to two years in prison.

As of 17<sup>th</sup> September, 2018, Canada has banned the main source of artificial trans fats – partially hydrogenated oils (PHOs), making it illegal for manufacturers to use the additive in any food made or imported into the country, as well as in any meals in restaurants. Artificial trans fats are not banned in the UK, instead there is a voluntary agreement (from 2012) between most supermarkets and fast food chains not to use artificial trans fats.

### **Australia** (S40)

Australia's policy on Food Safety diverges from us due to it being a matter devolved to the states and territories. Food Safety at the Federal level is primarily concerned with Import/Export law and, as a result of Australia's bio-security policies, is

incredibly strict, with 95% of items needing to be declared and Fruit, Food from your mode of travel and Homemade Food being completely banned on a personal level.

A summary about the variation in differences between the states and territories can be found here (<https://www.foodsafety.com.au/resources/guides/food-safety-supervisors-a-state-and-territory-guide>), however I looked largely at the States of Victoria and New South Wales being the most populous states (2<sup>nd</sup> and 1<sup>st</sup> respectively). The major difference in Food Safety law to the UK is New South Wales (where Sydney is located), where all persons involved in “Food Handling” must take an accredited Food Handling Course at their expense. Furthermore to support their work, Food Authorities in New South Wales are allowed to form and invest in private corporate interests.

As individual differences are beyond the timeframe that I have, I thought a broad-spectrum view would be more useful in identifying differences in the amount of regulation. All information and statistics are from the official government websites of the state of New South Wales and Victoria:

In the UK there have been 17 Convictions since 2016, whilst in the State of Victoria there were 23 convictions in 2018 alone. In New South Wales there was only 1 Conviction in 2018, but there were 38 since 2016. This suggests that there is either much greater burden of regulation, or that it is enforced far more thoroughly.

By looking at the comparative number of Food Recalls, we can detect a similar trend. 32 Food Recalls in Australia since 2018 compared to 85 Food Recalls in the UK would appear to suggest that regulation in Australia is far more comprehensive and extensive and therefore preventing these problems from appearing.

Raw Drinking Milk has been banned in Australia since 1943, with compulsory pasteurisation for all milk from cows with a maximum penalty of \$55,000 AUS. In 2016 in Victoria legislation was passed requiring all Raw Drinking Milk to be treated so as to be undrinkable.

<https://www.ausrawmilk.org/regulating-rm> (THIS LINK HAS A COMPARISON WITH THE US, UK and NZ)

## **New Zealand (S40)**

### **Regulated Control Schemes**

A regulated control scheme (RCS) is imposed by the government to manage food-related risks. This is done through MPI and in consultation with industry. The government develops an RCS in the following circumstances:

- when a risk management programme (RMP) would not be feasible or practicable;
- when it is more efficient for the government to run a national programme;
- if it is needed to meet the market access requirements of export markets.

RCSs are legislated in 2 different ways:

- under regulation; and
- as a notice under section 60 of the Animal Products Act (APA) 1999.

<https://www.mpi.govt.nz/food-safety/food-safety-codes-and-standards/regulated-control-schemes/>

## Raw Milk regulation

Following a period of consultation, requirements for the sale of RDM came into effect on 01 March 2016 which included:

- Registration for farmers to sell;
- Consumers must go to the farm to collect or have it home delivered; and
- Clear labelling on the health risks.

<https://www.mpi.govt.nz/food-safety/food-safety-for-consumers/is-it-safe-to-eat/raw-milk/raw-milk-regulations/>

## Nitrates/Nitrites

Vegetables are the largest source of nitrates and a major source of nitrites in NZ. Some countries – including those in Europe – have set limits for nitrate levels in specific vegetables. New Zealand has no set limits for vegetables, but spinach and lettuce tested were within European limits.

The use of nitrates and nitrites is regulated by the FSANZ, which also provides data on the acceptable daily intake (ADI); concluding that NZ adults will not exceed the ADI over their lifetime. For **processed meats**, it is acknowledged that the WHO International Agency for Research on Cancer (IARC) identified processed meat as carcinogenic to humans. However, as IARC did not look at what aspect of processed meats was the likely carcinogen, there is the *suggestion* to consumers that their intake of processed meats should be reduced until further studies are done.

<https://www.mpi.govt.nz/food-safety/whats-in-our-food/food-additives/nitrates-and-nitrites-preservatives/>

## Cooking “pink burgers”

MPI has provided detailed food safety guidance to chefs on cooking medium rare burgers and other red meat specialities (steak tartare). The preparation of such dishes is not banned.

<https://www.mpi.govt.nz/dmsdocument/18851-information-for-chefs-cooking-medium-rare-burgers/loggedin>

## USA (s40)

### Raw milk

20 states prohibit the sale for human consumption. 8 states allow raw milk to be obtained only through cow-share agreements (consumers pay a farmer to milk their cattle). 17 states allow the sale of raw milk only on the farm on which it was produced (3 of these states only allow raw goats milk, not cow milk). 13 states allow the sale of raw milk in retail stores (1 of these states only allows this is the store is owned by the milk producer and 1 of these states only allow raw sheep milk, not raw cow milk).

## **Cheese**

The FDA allows cheese made from unpasteurized milk if it has undergone an aging process of at least 60 days at a temperature of at least 35F (2C) and labelled clearly as unpasteurised. This applies to domestically produced and imported cheese. In 2014, the FDA lowered the maximum bacteria level standard, which prevented more cheeses from being available in the US.

## **Cured bacon**

Bacon can be manufactured without the use of nitrite, but must be labelled "Uncured Bacon, No Nitrates or Nitrites added" and bear the statement "Not Preserved, Keep Refrigerated Below 40 °F At All Times" — unless the final product has been dried according to USDA regulations, or if the product contains an amount of salt sufficient to achieve an internal brine concentration of 10% or more, the label does not have to carry the handle statement of "Not Preserved, Keep Refrigerated below \_\_\_\_" etc. Recent research studies have shown for products labelled as uncured, certain ingredients added during formulation can naturally produce small amounts of nitrates in bacon and, therefore, have to be labelled with the explanatory statement "no nitrates or nitrites added except for those naturally occurring in ingredients such as celery juice powder, parsley, cherry powder, beet powder, spinach, sea salt etc."

## **Other**

The FDA banned the use of sheep lung and therefore, traditional haggis. It is illegal to slaughter horses for human consumption. In 2015, the FDA announced a phased-ban of trans fats in manufactured foods.



**Dr David Self**  
Head of Private Office  
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T: 020 7276 [s40]

M: [s40]

Floor 7, Clive House, 70 Petty France, London, SW1H 9EX

[david.self@food.gov.uk](mailto:david.self@food.gov.uk)

## **Email 11**

**From:** Colm McKenna

**Sent:** 28 February 2019 11:15

**To:** Heather Hancock <heather.hancock@food.gov.uk>

**Cc:** [s40]; Christopher Hitchen <Chris.Hitchen@food.gov.uk>; Jason Feeney <jason.feeney@food.gov.uk>; John Furley <John.Furley@food.gov.uk>

**Subject:** Re: Arac report

Hi Heather,

The plan for the March Board is to issue a one page summary to the board and then I will verbally present in more detail at the meeting.

Following that I propose that from June of this year I will issue a summary report in writing together with a copy of the full ARAC minutes, subject to your agreement. Apparently, we have never published ARAC minutes before but I'm unsure why we shouldn't in the future, particularly if all concerned are aware.

John Furley is currently drafting the summary and the minutes are in the process of being approved.

Let me know your thoughts.

Regards

Colm

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Sent from [Workspace ONE Boxer](#)

On 27 February 2019 at 17:46:13 GMT, Heather Hancock <[heather.hancock@food.gov.uk](mailto:heather.hancock@food.gov.uk)> wrote:

Afternoon Colm, hope all well I just wanted to check whether you are planning a written report back to the board on the ARAC meeting or a verbal one albeit you'll have had time to get your thoughts on order with the new rhythm?

Best regards

Heather

Mrs H J Hancock DL LVO  
Chairman

## **Email 12**

**From:** [s40]

**Sent:** 22 February 2019 13:31

**To:** Heather Hancock <heather.hancock@food.gov.uk>; [s40]; [s40]

**Cc:** [s40]

**Subject:** ACTION: Assessment Strategy - FSA Deputy Chair & Members

Dear Panel Members,

We are about to go live shortly for the Food Standards Agency (FSA) Deputy Chair and Members recruitment. I just wanted to provide an update on plans and do a final check that you are content with the advertising and assessment plans agreed with Ministers. (The Commissioner for Public Appointments likes to see evidence that Panels are also content. If the panel has a collective issue with anything we can go back to Ministers.):

• [

s35

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- The role description/person specification cleared by Ministers is attached.
- We are looking to go out to advert early w/c 25<sup>th</sup> February. Shortlisting is scheduled for the 8<sup>th</sup> April and interviews for the 21-23 May.
- The post will be advertised on the Cabinet Office and FSA websites and in the Times/Sunday Times online and Western Mail.
- Candidates will submit a CV and supporting statement to demonstrate how they meet the criteria set out in the published person specification.
- The Appointments Team will arrange for the applications to be pre-assessed into A, B & C ratings.
- The Panel will shortlist, assessing each application on merit, and out of those who meet all the essential criteria, invite the strongest for interview.
- Ministers can comment on the strength of the field at each stage of selection; any views from Ministers will be shared with the panel.
- The panel will assess at interview whether candidates are appointable.

- Ministers decide who to appoint from an unranked list of appointable candidates, and can also meet candidates.

**Grateful if you could confirm asap if you are content with the above.**

Many Thanks



Department  
of Health &  
Social Care

[s40]

Department of Health and Social Care

1N09 Quarry House, Quarry Hill, Leeds, LS2 7UE

E: [s40] T: [s40]

Follow us on Twitter @appointmentsDH

*Please note: following a change to our departmental name - from the Department of Health to the Department of Health and Social Care earlier this year - my new email address is [s40]*

**ATTACHMENT – FSA Deputy Chair and Members Role Description/Person Specification** – Attached to covering email

## **Email 13**

**From:** [s40]  
**Sent:** 12 February 2019 14:57  
**To:** Heather Hancock <heather.hancock@food.gov.uk>  
**Subject:** RE: Food Standards Agency

Dear Heather,

Thank you so much for reaching out. Unfortunately I am unable to take on any more commitments at the moment, I hope your search goes well and I will let you know if I can think of any good candidates.

All the best,

[s40]

**From:** Heather Hancock [<mailto:heather.hancock@food.gov.uk>]  
**Sent:** 11 February 2019 17:08  
**To:** [s40]  
**Subject:** Food Standards Agency

Dear [s40]

Apologies for the unsolicited email...

I chair the Food Standards Agency, the safety and public health regulator for the food industry in England Wales and Northern Ireland. We are shortly launching a recruitment campaign for non-exec members to join our departmental Board, and Health Ministers have suggested this might be of interest to you. If you'd like to know more about the FSA and the role of Board members, I'd be delighted to discuss this with you over the phone or in person. Do let me know,

With regards

Heather Hancock

## **Email 14**

**From:** [s40]  
**Sent:** 06 February 2019 09:37  
**To:** Heather Hancock <heather.hancock@food.gov.uk>  
**Cc:** [s40]; David Self <david.self@food.gov.uk>; [s40]  
**Subject:** FSA Deputy Chair & 3 Members

Hi Heather,

With reference to your email below.

I have sought advice from [s35] and I have attached their response below for your information. I've also included below the section from the [s35] that refers to [s35].

Our reading of the position is that [

S35

]

Hope helpful

[s35]

***'Political Activity6***

[s21]

[s35]

[

S35

S35



Department  
of Health &  
Social Care

[s40]

Department of Health and Social Care  
1N09 Quarry House, Quarry Hill, Leeds, LS2 7UE  
E: [s40] T: [s40]  
[Follow us on Twitter @appointmentsDH](#)

]

*Please note: following a change to our departmental name - from the Department of Health to the Department of Health and Social Care earlier this year - my new email address is [s40]*

**From:** Heather Hancock [<mailto:heather.hancock@food.gov.uk>]  
**Sent:** 31 January 2019 14:12  
**To:** [s40]  
**Cc:** [s40] David Self <[david.self@food.gov.uk](mailto:david.self@food.gov.uk)>; [s40]  
**Subject:** RE: Ref. VAC-1653 + VAC-1654 - FSA Deputy Chair & 3 Members

Thanks for the update, Heather

Mrs H J Hancock DL LVO  
Chairman

On 31 January 2019 at 14:09:28 GMT, [s40] wrote:

Hi Heather,

With reference to your email below, just to let you know that I'm checking with [s35] about your second point. I'll come back to you once I get a steer.

Many Thanks



Department  
of Health &  
Social Care

[s40]

Department of Health and Social Care  
1N09 Quarry House, Quarry Hill, Leeds, LS2 7UE  
E: [s40] T: [s40]  
[Follow us on Twitter @appointmentsDH](#)

*Please note: following a change to our departmental name - from the Department of Health to the Department of Health and Social Care earlier this year - my new email address is [s40]*

**From:** [s40]  
**Sent:** 30 January 2019 14:28  
**To:** [s40]  
**Subject:** FW: Ref. VAC-1653 + VAC-1654 - FSA Deputy Chair & 3 Members

**From:** Heather Hancock [<mailto:heather.hancock@food.gov.uk>]  
**Sent:** 29 January 2019 07:51  
**To:** [s40]  
**Cc:** David Self <[david.self@food.gov.uk](mailto:david.self@food.gov.uk)>; [s40]  
**Subject:** Re: Ref. VAC-1653 + VAC-1654 - FSA Deputy Chair & 3 Members

[s40]

[s35]

I think in the past however that [

s35

]

Heather

Mrs H J Hancock DL LVO  
Chairman  
On 28 January 2019 at 09:33:08 GMT, [s40] wrote:

Good morning Heather,

I'd be grateful if you can please confirm that you are content with the attached advert and letter for this campaign.

[s35]

Kind Regards,  
[s40]



[s40]  
Department of Health & Social Care, Room 1N09, Quarry House  
[s40]  
[Follow us on Twitter @DHSCgovuk](#)

**From:** Jo Bushnell  
**Sent:** 11 February 2019 22:09  
**To:** Heather Hancock <heather.hancock@food.gov.uk>  
**Subject:** FSA CEO pack & advert

Heather

Apologies for the delay. CEO candidate pack and advert attached, for you to share with your networks.

Regards

Jo

**ATTACHMENT 1 - CEO Media ad** – Attached to covering email

**ATTACHMENT 2 – CEO Final candidate pack** - Attached to covering email

## STRATEGIC FOOD SAFETY DIALOGUE 2019

### “TRANSPARENCY IN RISK MANAGEMENT” – A STIMULUS FOR DISCUSSION

#### Introduction

What is the rationale for a discussion on transparency in risk management?

First, normative texts expect it:

- “The risk management process should be transparent, consistent and fully documented” (*Working Principles for Risk Analysis for Food Safety for Application by Governments* (Codex Alimentarius, CAC/GL 62-2007))
- “There is a need for food safety decision-making processes to be structured, accountable and transparent” (*Food Safety Risk Management: Evidence-informed Policies and Decisions, Considering Multiple Factors* (Food and Agriculture Organization, FAO Food Safety and Quality Series 4, 2017))

Transparency is especially important when factors beyond traditional science-based evidence are considered, to the extent they are legitimate within national rule-making:

- “Decision-makers therefore need to consult broadly, consider a wide range of evidence, and balance health, trade, food and agriculture, and food security considerations” (*Food Safety Risk Management: Evidence-informed Policies and Decisions, Considering Multiple Factors* (Food and Agriculture Organization, FAO Food Safety and Quality Series 4, 2017))
- “It may seem easier for risk managers to explain and defend food safety decisions based on scientific and economic analysis, which provide a more objective basis than ethics. But the ethical choices embedded in risk management decisions need to be openly examined to facilitate transparency and good communication” (*Food Safety Risk Analysis: A Guide for National Food Safety Authorities* (Food and Agriculture Organization, FAO Food and Nutrition Paper 87, 2006))

And also when we deal with uncertainty:

- “When making risk management decisions, national food safety authorities need to take into account uncertainty, as transparently as they can” (*Food Safety Risk Analysis: A Guide for National Food Safety Authorities* (Food and Agriculture Organization, FAO Food and Nutrition Paper 87, 2006))

Second, we call for transparency in our trade arrangements with each other:

- Summary of specific negotiating objectives for the US-EU negotiations, published in January 2019 by the Office of the US Trade Representative includes: “Establish new and enforceable rules to ensure that science-based SPS measures are developed and implemented in a transparent, predictable, and non-discriminatory manner”.

But why is it important? And is anyone doing it?

### Why it is important?

The EU Heads of Agencies group (HoA) is a discussion forum to which senior representatives are invited from national food authorities in EU Member States. It is not a formal part of any of the EU institutions, but the European Commission routinely attends and contributes at its meetings. In response to a discussion paper from the UK in 2011, HoA recognised the importance of transparency in risk management and established a working group which published two reports on the topic. This paper draws on the discussion and principles developed by the working group.

The 2012 report from the HoA working group established that “The proper and transparent use of risk assessment in decision making is essential to maintaining and building trust and credibility of food regulation and the wider food system. This trust and credibility is undermined when risk managers and decision-makers selectively interpret or misrepresent the scientific aspects of risk assessments, particularly with regard to uncertainty, to justify decisions which are really based on political, social, economic or other factors.” This usefully identifies one of the key goals for transparency in risk management, which is to build trust and credibility by ensuring that the basis for risk management and the information and analysis used within it is clear, rational and justifiable. It underlines the importance of risk communication throughout the risk analysis process. It also identifies one of the key dangers if risk management is less than transparent, or risk communication fails for other reasons, which is the misrepresentation of science for political expediency. In particular, an expressed lack of trust by civil society in risk managers and regulatory authorities can precipitate political decisions based on an unjustified and disproportionate level of precaution, that overstates risks or uncertainties that are not soundly based in evidence and which might, intentionally or inadvertently, curtail opportunities to employ innovations that could benefit consumers, society or the economy.

So, it is important that we avoid the misrepresentation of risk assessment and uncertainty to justify risk management decisions based largely on other factors. That does not reduce the legitimacy of those other factors – weighing the hazards and risks of an option for risk management action against social impacts, costs and benefits of that action is an important and integral component of risk management. Instead, the social, economic and ethical factors that are inextricably bound up in national risk management decision-making should be identified explicitly and transparently. The factors used by different countries will differ, and transparency aids communication, providing a means of reaching a shared understanding between trading partners.

Once these factors are identified explicitly and transparently, they should then be assessed in a rigorous and consistent manner – and that assessment should be based on quantitative and qualitative evidence rather than anecdote or supposition, and the quality of the evidence and any inherent uncertainties should be documented and communicated.

### Is anyone doing it?

The Codex Alimentarius Commission is a risk manager. It is the global food standards setting body with a dual mandate of protecting consumer health and promoting fair practices in the food trade. The Codex Alimentarius Commission has transparency as one of its four core values. It delivers transparency in a number of ways. The meetings of the Commission and its subsidiary bodies are open to accredited delegates from any of its 189 members and over 200 observers. Its procedures for risk analysis are well-established and are set out in its published Procedural Manual. The agendas, papers and reports from these meetings are publicly available.

The vast majority of the standards, codes of practice and other texts that are developed by Codex are agreed by consensus among its members. It is, I hope, indisputable that the transparency of Codex bodies facilitates consensus-building and supports the elaboration and robustness of its normative texts. There is, however, a small proportion of standards where consensus has not been reached. On occasion, there are disagreements between members on scientific issues relating to risk assessments undertaken by WHO/FAO joint scientific committees. On other occasions, there is disagreement on the factors other than public health risk assessment that it is legitimate to reference and use in risk management.

The Codex Procedural Manual includes the concept of other legitimate factors relevant to the health protection of consumers and to ensuring fair practices in food trade, and sets out criteria for the consideration of such factors. The criteria acknowledge that such factors may be identified and that risk managers should indicate how these factors affect the selection of risk management options and the development of standards, guidelines and related texts. They recognise the legitimacy of considering the feasibility of risk management options due to the nature and particular constraints of production or processing methods, they indicate that concerns related to economic interests and trade issues in general should be substantiated by quantifiable data, and they state that the integration of other legitimate factors into risk management should not create unjustified barriers to trade – all of which are elements of a useful framework. However, the criteria also require that only those other factors which can be accepted on a worldwide basis (or on a regional basis in the case of regional standards and related texts) should be taken into account in the framework of Codex.

This is a challenging criterion to satisfy and, perhaps inevitably, no such factors beyond those identified in the criteria have been accepted on a worldwide basis to date. The recent FAO guidance document *Food Safety Risk Management: Evidence-informed Policies and Decisions, Considering Multiple Factors* (2017) identifies some decision factors that are related to harm that may result from a foodborne hazard or a control measure. It also identifies other decision factors which are related to practical considerations associated with implementing a risk management option or policy. Although these have not been the subject of rigorous examination in an intergovernmental forum such as Codex Alimentarius, they are based on discussions with risk managers and policy-makers in different countries. Might they form the basis for productive discussion of other legitimate factors which can be accepted on a worldwide basis?

It is a truism that Codex does not address the authorisation of use of regulated substances such as direct additives for food or animal feed, pesticides, or veterinary medicines, but establishes Maximum Levels or Maximum Residue Levels for those substances in foods, which national authorities may choose to adopt. Perhaps this distinction is not adequately recognised in the inevitable technical detail of debates in the Codex system. There may be the scope for agreement on the maximum levels of these regulated chemicals in food which would avoid unacceptable levels of risk to consumers, but regulated products by their nature need to be authorised before they can be used – and it is clear that different national regulatory authorities use and weigh factors other than public health risk assessment very differently when reaching decisions on authorisations. The strategic context and framework for decisions on authorisation of regulated substances, which informs the use and weighting of those factors, is set by national food safety policy and not by Codex.

It will be for Codex members to determine how to proceed on issues where consensus has, so far, been elusive and we can anticipate further discussion at the meetings of the Codex Executive Committee and the Codex Alimentarius Commission this summer.

So let us turn our attention to our national and supranational regulatory authorities. There is clearly the recognition among these authorities that this is an important issue. Some key principles were set out more than a decade ago in the *Codex Working Principles for Risk Analysis for Food Safety for Application by Governments* (2007). The published objective of the HoA working group several years later was to develop recommendations on how to ensure consistent and transparent application of these principles. The working group's second report acknowledged that approaches need to be flexible and to be adapted to the specific contexts of the country and to the issues being considered. But although our national contexts may differ, the essential challenge for each of us is identical – to develop and promote a level of transparency and rigour in the risk management process that is comparable to the transparency and rigour that we have successfully incorporated into the risk assessment process. The recent publication by FAO of its guidance document *Food*

*Safety Risk Management: Evidence-informed Policies and Decisions, Considering Multiple Factors* (2017) marks a significant step forward in the elucidation of globally relevant guidance.

Each of our authorities can speak for itself in terms of the priority it attaches to this issue and the steps that have been taken. National and supranational authorities across the EU, US, Canada, Australia and New Zealand are all undertaking work in this area. There will inevitably be benefits in sharing our experiences in the development and use of national approaches and, critically, in engaging decision-makers at the political level to secure their support for adopting more consistent, transparent, evidence-based approaches in practice, which build the confidence of stakeholders including trading partners in our national approaches.

### A UK approach

In line with our organisational values of openness and transparency, we have debated publicly our approach to risk analysis at meetings of the Board of the Food Standards Agency (FSA) over the past six months.

We established some key principles early on:

- that we will continue to align practice and processes with international norms, recognising that this is important in order to support both consumer protection and the facilitation of trade;
- that we will continue to observe the provisions of the long-standing FSA Code of Practice on Openness, and in particular that we will publish any substantive advice we provide to other Government Departments and will explain the reasons for our advice to enable stakeholders to see the analysis and evidence on which decisions have been made and to make an informed judgement about the quality of our processes and decisions;
- that we have put in place appropriate governance and assurance mechanisms that ensure that our risk analysis processes deliver public health protection and take fully into account consumers' wider interests in relation to food, and that the outputs from the risk analysis process are timely, of appropriate quality, and sufficiently robust to stand up to external scrutiny.

We have acknowledged the importance of transparency in the identification of other legitimate factors that are relevant to each risk analysis and the need to ensure that such factors are rigorously and consistently assessed. In order to ensure policy coherence and acknowledging the complex and multifactorial nature of decision-making in relation to food safety and standards, the risk management process will ensure the interests of other government departments with responsibilities for food and agriculture, health and trade are documented and considered, and we will indicate publicly how these interests affect the selection of risk management options.

## Take home messages

In our assessment, and central to our construction of a national risk analysis process for food safety and standards, the following issues are important in improving transparency in risk management:

- Clear and coherent procedures, building stakeholders' awareness of the end-to-end risk assessment process. Stakeholders should be able to scrutinise the process and steps by which we reach risk management decisions.
- Candidness about the nature of factors other than public health risk assessment that it is legitimate to incorporate into the risk management process.
- Deliberative problem formulation, that allows factors other than public health risk assessment that are relevant to each risk analysis issue to be identified and appropriate means selected to address them.
- The importance of then ensuring that such factors are rigorously and consistently assessed by appropriate and competent experts - issues for risk assessment are carried out by the appropriate risk assessment body; other factors are addressed through other evidence-based analytical processes.
- Open publication of risk management advice to decision-makers, together with the analysis and evidence on which that risk management decision was taken.



Civil Service



# Chief Executive Officer Food Standards Agency

## SCS Pay Band 3

Reference: 1619354

Closing date: 23:59 Sunday 3 March, 2019



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# Why join Food Standards Agency?

Heather Hancock, Chairman

“ We stand on the brink of the biggest change in food regulation in decades ”



I am delighted by your interest in becoming Chief Executive of the Food Standards Agency (FSA).

We stand on the brink of the biggest change in food and feed safety regulation in decades. As the UK prepares to leave the European Union almost every aspect of the FSA's work will be affected, whatever the nature of our future relationship with the EU. Since 2016, we have worked hard to put in place an effective and equivalent regulatory regime to replace the functions and decisions which previously rested at the European level. This has meant designing a new food and feed risk management framework to protect public health and consumer interests across England, Wales and Northern Ireland, closely aligning us with Food Standards Scotland. The FSA is ready for the Day One consequences of EU Exit, and our new Chief Executive will lead on embedding the new functions, capacity and ways of working this entails, ensuring

we are match-fit for new challenges and demands outside the EU. Maintaining constructive and progressive working relationships with the wider government in each of the three countries will be key to this.

I am proud that alongside preparing for EU Exit, we have maintained the momentum of our bold four-year programme to modernise and future proof the regulatory regime in England, Wales and Northern Ireland. Whilst it is businesses' job to ensure food is safe and what it says it is; it's our job to set the rules and standards offering that assurance, and to ensure that business complies. Our transformation programme is introducing a more agile, tech-enabled and data-led approach, delivering better regulation in an increasingly complex global food system. Our new CEO will lead on finalising the outstanding elements of this new regime, and ensuring its full implementation. This transformation changes the FSA's own

role and ways of working as well as those of our colleagues in local government. The Regulating our Future programme demonstrates our decisive action to ensure that the regulatory regime is fit for purpose, properly assured, and working effectively for the public good.

Everything that the FSA does is driven by our guiding legislation – to prioritise the public interest in relation to food. Public trust in the people who make and sell food is not high enough. We have a part to play in driving up compliance, encouraging transparency and openness. We will make it easy for business to do the right thing, and for consumers to understand it. To achieve this, we must adhere to our commitment to openness and transparency, collaborating with all the actors in the food system, having a mature and robust relationship with the industry and critically, always making evidence-based decisions driven by sound, unbiased and relevant science. How we handle food safety incidents is central to this, and places its own

demands on the judgment and handling skills of our new CEO. Public understanding and confidence in the FSA is at its highest ever levels - keeping it there is essential.

I believe the FSA is in good shape, with a strong leadership team, clear direction and a committed, talented workforce. The last 3 years' progress demonstrates exactly what we can achieve with the CEO and executive team working closely with me, the Board, and senior stakeholders across government and industry, delivering on so many fronts amidst so much uncertainty and high expectations. If you are energetic, relish combining strategic leadership with making things happen at the sharp end, can synthesise the industry and government landscapes we bridge, and have an ambition to see the FSA recognised as an excellent modern regulator, please read on. We look forward to hearing from you.

**Heather Hancock, Chairman**

# About the Food Standards Agency

**We are an independent Government department working to protect public health and consumers' wider interests in food. We make sure that food is safe and what it says it is.**

The FSA is a non-ministerial government department which leads on food safety regulation and policy across the whole food chain, from "farm to fork". This includes food standards and safety, animal feed safety and standards, the national food crime unit, and aspects of food labelling, nutrition and dietary health policy, varying across England, Wales and Northern Ireland.

Our aim is for people to trust that food is safe, and what it says it is. It is the job of businesses producing and selling food to make sure it is safe and authentic. It is

our job to be sure business steps up to that responsibility.

The statutory purpose of the FSA is to protect public health, and consumers' other interests in relation to food. In 18 years, the department has developed and implemented a well-regarded system of national food safety and standards. We have had a major international influence which stands us well looking into the future. Our independence is key. We are open about policy, science and evidence, honest about risks, and trusted by the public, business and politicians. Gathering and understanding the consumer perspective, searching out and listening to the public voice, is central to the way we work. Public trust in food is not a given.

To improve that trust and confidence, we need grown-up relationships with the food industry. We must understand their motivations, the actions they are taking to comply with the rules, the implications of change in the fast paced global food system, the threats they face, and why

sometimes food businesses fall short of expectations. It matters that food businesses trust the FSA to be fair, consistent, clear and unambiguous, if we are to keep the UK ahead of the world in food standards and safety.

When the UK leaves the European Union, the FSA will take full responsibility for risk assessment, risk communication and developing risk management advice. We will have an important contribution to make in future trade arrangements across the world, where the UK food safety system is held in high regard, and valued by our food exporters.

We are three years into a major transformation programme to modernise and reshape the regulatory regime for food. We have created a new digital registration system for food businesses, aligned the regulatory regime with the priority demands of EU exit, and made significant progress in developing National Inspection Standards. The goal is to deliver more proportionate, risk-based regulation, using the full suite of

regulatory tools, to make things better for the public. Business transparency is an important part of this. Our next priorities in the programme are to deliver greater confidence about local authority performance of their obligations, and to build a new model for food standards assurance. Alongside this we are building a risk engine to drive more targeted intervention in food businesses that pose the greatest risk to consumers. We want to strengthen enforcement where people deliberately or wilfully jeopardise public health, and help businesses get it right from the start when it comes to food standards and safety.

Other priorities for the Board include: a risk-driven approach to setting science priorities; making a success of the expanded National Food Crime Unit; providing better protection and confidence for people with food allergies and food intolerance; getting on the front foot in surveillance and horizon scanning about food and feed safety risks. Our ability to work effectively across England, Wales and Northern Ireland, underpins all that we do. During 2019, the Board will agree the next set of strategic priorities for the FSA, all aimed at meeting our outcome targets about better public

health, increased public trust in us and in food, and business confidence in the FSA.

In short, the FSA is moving towards a goal of being recognised as an excellent modern regulator.

### Governance

The FSA Board has up to 12 non-executive members, including the Chair and Deputy Chair. Heather Hancock was appointed to Chair the Board in 2016, and has recently been reappointed to serve until 2022. The Chief Executive attends all meetings of the FSA Board, its business Committee and its audit and risk committee. The Board operates on the principle of openness and transparency. Board meetings are open to the public, and live streamed via web cast. The Chief Executive presents a written report and oral update to every meeting and is available for questions from the Board throughout the meeting.

### The Senior Leadership Team



To find out more about what we do go to <https://www.food.gov.uk>

# About the role

## **Job Title**

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Chief Executive Officer

## **Location**

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Belfast, Birmingham, Cardiff, London or York with a requirement to be in London on average three days a week.

## **Salary**

---

Up to £150,000 per annum.

Existing Civil Servants will be appointed in line with the Civil Service pay rules in place on the date of their appointment.

## **Contract Type**

---

This role is being offered on a permanent basis. Secondments and Loans for a minimum of three years will also be considered.

## **The Role**

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The Chief Executive is the senior executive responsible for leading this high profile department, facing significant public and political pressures.

A key demand is working effectively with administrations serving different political persuasions across England, Wales and Northern Ireland, and maintaining close liaison and working relationships with Food Standards Scotland.

The Chief Executive manages relationships with a wide range of stakeholders, including national and local government, businesses, consumers, the European Commission, and its counterparts across Europe. Global relationships matter: international organisations like Codex are critical, as are sister departments in the USA, Canada, Australia, New Zealand. Our network continues to widen and embrace countries in Asia, Africa and South America, as the food chain becomes an ever more complex global system.

The Chief Executive is the department's accounting officer. Our strategy and direction, and key policy decisions, are determined by a non-executive Board, under the leadership and management of a part-time Chair. The Board provides oversight and scrutiny of the department's performance. The Chair is more closely involved day to day, particularly in stakeholder and Ministerial relationships, and high level plans to carry forward our strategy.

Key responsibilities and policy areas include:

- Providing executive leadership of a non-ministerial government department that regulates all aspects of the food industry – from farm to fork, covering animal feed and food, as well as imports and exports
- Advising the Board on its strategic direction and choices, ensuring delivery of the Board's desired outcomes and ensuring that the policy and decisions of the department are based on sound science and evidence

- Leading on developing policies and plans to deliver safe food for the nation. This includes:
  - Maintaining high performance in the current regulatory regime through a period of considerable change and resource pressure
  - Advising on and implementing plans for the consequences of the UK's decision to leave the European Union; post-Exit, embedding these new arrangements to high performance standards
  - Delivering the transformation programme for the regulatory system across all aspects of food in England, Wales and Northern Ireland. This includes meat inspection, food standards, local authority performance, food hygiene rating scheme, port controls, sampling and surveillance etc.
  - Providing leadership and decision making in food incidents. Successfully implementing the expansion of the National Food Crime Unit

- Ensuring that the FSA's varying responsibilities in England, Wales and Northern Ireland are prioritised, resourced and delivered to meet national needs and outcomes within a coherent overall framework
- Developing and maintaining effective relationships with a range of national and international stakeholders, covering all parts of the food industry, the global network for food standards and regulations, consumers and their representation organisations
- Championing and embedding a culture within the department that embraces change, fulfils the FSA's principles of openness, independence, fairness, science and evidence and puts the consumer first
- Communicating as part of the external media face of the FSA, particularly in times of incident or crisis, to maintain the confidence of the public and food industry alike.

With a budget of around £120 million a year, the CEO leads a multi-unionised workforce of around 1200 staff spread across England, Wales, Northern Ireland and Brussels. They will report directly to

the Chair of the FSA Board and will have direct line management responsibility for eight Directors.

As member of the Senior Civil Service, the Chief Executive Officer is expected to play an active role in the ongoing corporate management and development of both the department and wider Civil Service. We expect all our senior leaders to be:

- **Inspiring** – about our work and its future
- **Confident** – in our engagement with others
- **Empowering** – to allow our teams to deliver

(<https://www.gov.uk/government/publications/civil-service-leadership-statement/civil-service-leadership-statement>)

# Person Specification

It is important through your CV and Statement of Suitability that you give evidence and examples of proven experience of each of the selection criteria detailed.

The successful candidate will be able to demonstrate:

- Outstanding people leadership skills gained in a complex operational delivery environment with a proven ability to develop an inclusive, motivated, engaged and high performing workforce,
- A successful track record of embedding strategy at an organisational level to ensure excellent delivery outcomes and with an eye for detail.
- The personal credibility to build and manage highly effective, influential and collaborative relationships at Board level and with complex stakeholder groups across the public and private sectors in order to build industry confidence.
- An excellent policy background with the ability to manage significant political and operational risks, including on the international stage and the resilience to operate effectively in a dynamic and ambiguous policy landscape.
- Proven leadership of change with the ability to articulate the strategic vision for the Agency. A track record of delivering substantial improvements to increase operational effectiveness and value for money, including the setting up of new capabilities.

# Benefits of working for the Civil Service

Whatever your role, we take your career and development seriously, and want to enable you to build a really successful career with the Department and wider Civil Service. It is crucial that our employees have the right skills to develop their careers and meet the challenges ahead, and you'll benefit from regular performance and development reviews to ensure this development is ongoing. As a Civil Service employee, you'll be entitled to a large range of benefits.

## Equality, Diversity and Inclusion

**The Civil Service values and supports all its employees.**

We have strong and pro-active staff networks, special leave policies for hospital appointments, reasonable adjustments put in place for those who need them, and diversity talent programmes to help everyone irrespective of background, to achieve their potential.

## Pension

**Your pension is a valuable part of your total reward package.**

A competitive contributory pension scheme that you can enter as soon as you join where we will make a significant contribution to the cost of your pension; where your contributions come out of your salary before any tax is taken; and where your pension will continue to provide valuable benefits for you and your family if you are too ill to continue to work or die before you retire. Visit [Civil Service Pension Scheme](#) for more details.

## Generous Annual Leave and Bank Holiday Allowance

25 days annual leave on entry, increasing on a sliding scale to 30 days after 5 years' service. This is in addition to 8 public holidays.

This will be complimented by one further day paid privilege entitlement to mark the Queen's Birthday.

## Staff Wellbeing

**Flexible working hours** allowing you to vary your working day as long as you work your total hours. Opportunity to work from home for part of the working week.

Generous **paid maternity and paternity leave** which is notably more than the statutory minimum offered by many other employers.

**Childcare benefits** (policy for new employees as of 5 April 2018): The government has introduced the Tax-Free Childcare (TFC) scheme. Working parents can open an online childcare account and for every £8 they pay in, the government adds £2, up to a maximum of £2000 a year for each child or £4000 for a disabled child. Parents then use the funds to pay for registered childcare. Existing employees may be able to continue to claim childcare vouchers, so please check how the policy would work for you [here](#).

## **Season Ticket and Bicycle Loan**

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Interest-free loans allowing you to spread the cost of an annual travel season ticket or a new bicycle.

## **Sick Pay**

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Occupational sick pay.

# The Recruitment Process

## Application

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To apply for this post, you will need to complete the online application process accessed via the advertisement listed for this role. This should be completed no later than Sunday 3 March and will involve uploading the two documents outlined below:

1. A **CV** setting out your career history, with key responsibilities and achievements. Please ensure you have provided reasons for any gaps within the last two years
2. A **Statement of Suitability** (no longer than two pages) explaining how you consider your personal skills, qualities and experience provide evidence of your suitability for the role, with particular reference to the criteria in the person specification

Failure to submit both documents will mean the panel only have limited information on which to assess your application against the criteria in the person specification.

Please ensure that both documents contain your full name.

As part of the online application process, you will be asked a number of diversity-related questions. If you do not wish to provide a declaration on any of the particular characteristics, you will have the option to select 'prefer not to say'. The information you provide when submitting your application will help us monitor our progress towards the Civil Service becoming the most inclusive employer by 2020. See the [Civil Service Diversity and Inclusion Strategy](#) for more information.

Should you encounter any issues with your online application or are unable to apply online please contact [paul.massini@cabinetoffice.gov.uk](mailto:paul.massini@cabinetoffice.gov.uk) :

## Selection Process

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Jan Cameron, a Civil Service Commissioner, will chair the process. The Civil Service Commission has two primary functions:

- Providing assurance that selection for appointment to the Civil Service is on merit on the basis of fair and open competition. For the most senior posts in the Civil Service, the Commission discharges its responsibilities directly by overseeing the recruitment process and by a Commissioner chairing the selection panel.
- Hearing and determining appeals made by civil servants under the Civil Service Code which sets out the Civil Service values – Impartiality, Objectivity, Integrity and Honesty - and forms part of the relationship between civil servants and their employer.

More detailed information can be found on the [Civil Service Commission website](#).

In addition to Jan, the selection panel will include Heather Hancock, Chairman FSA and two further panel members, to be announced.

## **Longlist and Shortlist**

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You will receive an acknowledgment of your application through the online process.

The panel will then assess your application to select those demonstrating the best fit with the role by considering the evidence you have provided against the criteria set out in the '[Person Specification](#)' section. Failure to address any or all of these may affect your application.

The timeline later in this pack indicates the date by which decisions are expected to be made, and all longlisted and shortlisted candidates will be advised of the outcome as soon as possible thereafter.

## **Assessment**

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If you are shortlisted, you will be asked to take part in a series of assessments which will include a media assessment and a staff engagement exercise. These assessments will not result in a pass or fail decision. Rather, they are designed to support the panel's decision making and highlight areas for the panel to explore further at interview.

You may also have the opportunity to speak to Heather Hancock and the current incumbent, Jason Feeney, prior to the final interview to learn more about the role and the organisation. Please note this is not part of the formal assessment process.

You will be asked to attend a panel interview in order to have a more in-depth discussion of your previous experience and professional competence in relation to the criteria set out in the Person Specification.

Full details of the assessment process will be made available to shortlisted candidates.

## **Offer**

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Regardless of the outcome, we will notify all candidates as soon as possible after the final interview.

# Expected Timeline

We will try and offer as much flexibility as we can, but it may not be possible to offer alternative dates for assessments or interviews. You are therefore asked to note the below timetable, exercising flexibility through the recruitment and selection process, in order to meet the dates given. Please note that these dates may be subject to change.

The anticipated timetable is as follows:

Advert Closing Date	23:59 Sunday 3 March 2019
Longlist Meeting	Week commencing 11 March 2019
Shortlist Meeting	Week commencing 25 March 2019
Assessments	9 April 2019 (London)
Interviews	17 April 2019 (London)

# FAQs

## **Can I apply if I am not currently a civil servant?**

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Yes. This role is open to suitably qualified people in the external market and to existing civil servants and those in accredited Non- Departmental Bodies.

## **Is this role suitable for part-time working?**

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This role is available on a full-time working arrangement. A job share partnership will be considered.

## **Will the role involve travel?**

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Regular travel may be required for this role.

## **Where will the role be based?**

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If successful you will be based in Belfast, Birmingham, Cardiff London or York.

Unfortunately relocation costs will not be reimbursed.

You will be required to work in London for three days per week.

## **Can I claim back any expenses incurred during the recruitment process?**

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No. Unfortunately we will not be able to reimburse you, except in exceptional circumstances and only when agreed in advance.

## **What nationality do I need to hold in order to apply?**

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To be eligible for employment to this role you must be a national from the following countries:

- The United Kingdom
- The Republic of Ireland
- The Commonwealth\*
- A European Economic Area (EEA) Member State
- Switzerland
- Turkey

Certain family members of EEA, Switzerland and Turkish nationals are

also eligible to apply regardless of their nationality.

(\*Commonwealth citizens not yet in the UK, who have no right of abode in the UK and who do not have leave to enter the UK are ineligible to apply.)

For further information on whether you are eligible to apply, please visit [Gov.UK](https://www.gov.uk).

## **Is security clearance required?**

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Yes. If successful you must hold, or be willing to obtain, security clearance to SC level. More information about the vetting process can be found [here](#).

## **What reasonable adjustments can be made if I have a disability?**

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We are committed to making reasonable adjustments in order to support disabled job applicants and ensure that you are not disadvantaged in the recruitment and assessment process.

If you feel that you may need a reasonable adjustment to be made, or you would like to discuss your requirements in more detail, please contact

[nicola.jenkins1@cabinetoffice.gov.uk](mailto:nicola.jenkins1@cabinetoffice.gov.uk) in the first instance.

### **Do you offer a Guaranteed Interview Scheme for Disabled Persons?**

Disabled applicants who meet the minimum selection criteria in the job specification are guaranteed an interview. Selection will be on merit. If you wish to claim a guaranteed interview under the Disability Commitment, you should complete the relevant section of the online application. It is not necessary to state the nature of your disability.

### **Will this role be overseen by the Civil Service Commission?**

Yes. As this role is one of the more senior posts within the Civil Service, a Commissioner will oversee the recruitment process and chair the selection panel.

More detailed information can be found on the Civil Service Commission [website](#).

### **What do I do if I want to make a complaint?**

The law requires that selection for appointment to the Civil Service is on merit on the basis of fair and open

competition as outlined in the [Civil Service Commission's Recruitment Principles](#).

If you feel your application has not been treated in accordance with the Recruitment Principles, and you wish to make a complaint, you should contact the HR Director [jo.bushnell@food.gov.uk](mailto:jo.bushnell@food.gov.uk) in the first instance.

If you are not satisfied with the response you receive from the Department, you can contact the [Civil Service Commission](#).

### **What should I do if I think that I have a conflict of interest?**

Candidates must note the requirement to declare any interests that might cause questions to be raised about their approach to the business of the Department.

If you believe that you may have a conflict of interest please contact [nicola.jenkins1@cabinetoffice.gov.uk](mailto:nicola.jenkins1@cabinetoffice.gov.uk) before submitting your application.

# Diversity & Inclusion

The Civil Service is committed to becoming the most inclusive employer in the UK.



We are committed to understanding, respecting and representing as broad a range of views and backgrounds as we have in UK society. We know that diverse perspectives and experiences are critical to an effective, modern Civil Service.

Our vision is to ensure the Civil Service represents modern Britain and is a truly inclusive employer – an example to other employers. We will create an organisation where diversity is not only respected and valued – but celebrated.

## What's in it for me?

We want to maximise the potential of everyone who chooses to work for us – regardless of background.

If you're interested in becoming a world class leader, developing your career with us – starting with this interesting and challenging role – or doing things differently and inspiring colleagues, then the Civil Service is the place for you.

Our passion for diversity and equality means creating a work environment for all employees that is welcoming, respectful, engaging, and enriched with opportunities for personal and professional development.

## What's next?

You've taken the first step and looked through this job pack to understand the skills and experience needed to perform this role. Now join us in achieving our ambitions and let us help you achieve yours. [Read more.](#)



Civil Service

## Contact us

Should candidates like to discuss the role in more detail before submitting an application, please contact our Recruitment Search Partner **Nicola Jenkins** on **07738 101462** or [nicola.jenkins1@cabinetoffice.gov.uk](mailto:nicola.jenkins1@cabinetoffice.gov.uk)

This campaign is being run on behalf of the department by Executive Recruitment. Executive Recruitment is part of Civil Service Talent, part of Civil Service HR, and is a central government expert service specialising in the attraction, search, selection and recruitment of senior civil servants.

The team is regularly commissioned by departments and other government organisations to deliver end-to-end recruitment for some of society's most important leadership and specialist positions.

Our work is regulated by the Civil Service Commission where necessary and supported by the equality campaign group Stonewall.

Cabinet Office is a Disability Confident employer.



## **Chief Executive Officer**

**Salary: up to £150,000 per annum**

**Location: Belfast, Birmingham, Cardiff, London or York**

Are you the kind of person who combines strategic leadership with the ability to make things happen at the sharp end? Do you have a track record of delivering results in a complex stakeholder environment? Do you already have hands-on experience of successfully driving through organisational and cultural transformation?

If so, you may be our next Chief Executive Officer. The Food Standards Agency is a non-ministerial Government department responsible for regulating all aspects of the food industry – from farm to fork – in England, Wales and Northern Ireland.

We are now recruiting for the challenging but rewarding role of Chief Executive Officer to provide strategic vision and leadership to the organisation at a time of significant change, within the policy direction set by the Agency's Board. We are at a pivotal moment in food regulation and food standards – three years into a major transformation programme, aimed at modernising and future proofing the regulatory regime in England, Wales and Northern Ireland.

In this critical role as well as leading on developing policies and plans to deliver safe food for the nation, ensuring that the Agency maintains its high performance in the current regulatory regime whilst also delivering the transformation programme, you will also be responsible for advising on and implementing the consequences of the UK's decision to leave the European Union. Since 2016, we have been working hard to ensure there is a complete, effective and equivalent regulatory regime to replace the functions and decisions that, until now, have rested at the European level. This has meant designing a new food and feed risk management framework, one that protects public health and consumer interests, The FSA is ready for the Day One consequences of EU Exit and as our new Chief Executive you will lead on embedding the new functions, capacity and ways of working this entails, and ensure the FSA is match-fit for new challenges and demands, outside the EU.

For further details and how to apply please follow the link  
<https://www.civilservicejobs.service.gov.uk/csr/jobs.cgi?jcode=1619354>

The closing date for applications is **Sunday 3 March 2019**.

*The Food Standards Agency is an equal opportunity employer. We value diversity and want our workforce to reflect the communities that we serve. We are also committed to the employment and career development of disabled people.*

*The Civil Service Commission provides assurance that selection for appointment to the Civil Service is on merit on the basis of fair and open competition.*



**Deputy Chair and Members of the Food Standards Agency:  
Role Description/Person Specification****Role and Responsibilities of the Deputy Chair and Members**

The FSA Board gathers six times in the year: four Board meetings and Business committee meetings, each for two days; and two strategic or retreat events, for one or two days. In addition, Board members are expected to attend our annual Parliamentary reception, ad hoc events such as science symposia, and from time to time may be asked to join short term working groups or review teams on specific subjects (usually alongside external experts). The Audit and Risk Advisory Committee meets in person four times a year, and by teleconference once a year.

All members of the FSA Board have a responsibility to:

- ensure the FSA discharges its statutory duties in line with the requirement to protect public health and consumer interests in relation to food
- set and to reinforce the FSA's core values through the development and monitoring of strategic objectives, plans and policies
- represent the FSA and its values
- play an effective part in Board meetings, discussions and decisions
- monitor the performance of the Executive in meeting agreed objectives and targets, including: the delivery of services; continuous improvement; financial performance, and risk management
- assist with the appointment of the Chief Executive
- participate as a member or Chair of one or more of the Board Committees: Business, and Audit and Risk Assurance
- act in the public interest at all times, not as a representative of the interests of any particular sector, and without regard to any personal interests
- commit up to 20 days per annum to their FSA responsibilities. This covers Board and Committee meetings; Board awaydays, training and workshops; FSA events; travel to meetings across the UK; and thorough preparation for Board business.

Board members receive advice and support from the Executive in respect of their duties and are provided with background information in order to carry out their responsibilities. There is a dedicated secretariat to support the Board. The FSA Board is a paperless body.

**Responsibilities of the Deputy Chair**

In addition to the responsibilities of a Board member, the Deputy Chair's responsibilities are to:

- deputise as necessary for the Chair over the full range of their responsibilities
- act as a conduit between the Board members and the Chair, facilitating effective communication of consensus and opinions; promoting a culture of openness and debate and encouraging the effective contribution of Board members
- provide support and foster productive relations between the Executive and non-Executive Board members
- commit up to 35 days a year to their FSA responsibilities.

**Qualities required for the roles of Deputy Chair and Non-Executive Members**

Board members do not represent a particular industry or sector. To be considered for appointment, you must be able to demonstrate that you have the qualities, skills and experience to meet all the essential criteria set out below.

### **Essential Criteria**

- ability to operate on the Board of a major national organisation, with a clear understanding of effective governance, collective responsibility and constructive challenge
- proven strategic thinking and experience, able to help shape the FSA's strategic direction
- strong analytical and decision-making skills, able to weigh complex evidence and explain the basis for a decision
- commitment to putting the consumer first, with an awareness of consumer interests in relation to food and how the global food system is changing

and at least one of the following criteria:

- risk - leadership experience in risk analysis and risk-based judgments, at a corporate and strategic level. This may be in business and industry, in other regulatory environments, or from a scientific perspective
- audit and assurance – from a financial or regulatory/compliance perspective
- science – expertise and track record in challenging the prioritisation, analysis and assurance of science and evidence. The Board level requirement is for scientific literacy and science communications rather than a specific food-safety area of science
- senior leadership in local government.

In addition to the above criteria, the Deputy Chair will need to evidence the ability to:

- chair Board meetings of a significant national organisation, and support and sustain an effective board with strong Board relationships



## RESPONDENT GUIDANCE

### WHAT IS 360-DEGREE FEEDBACK?

360 degree feedback is a performance appraisal method that gathers feedback on an individual from a number of sources. This 360 feedback tool specifically focuses on the behaviours set out in the Civil Service [Leadership Statement](#).

### CONFIDENTIALITY

Please be assured that your responses are completely confidential and anonymous; all feedback (except that from Line Managers) is presented in a group format so that individual responses cannot be identified.

The supplier will ensure all personal data remains safe on a single secure UK-based server.

### GIVING FEEDBACK

Your feedback will provide the recipient of the feedback with the information they need to understand their performance across all areas of the Leadership Statement.

Evidence shows that we tend to rate more highly those who are similar to us in some way, for example those with similar interests or background. To help minimise this kind of unconscious bias, you might find it helpful to focus on the specific behaviours of the individual you are rating, rather than your overall impression of them.

Feedback is most useful when the comments:

- Offer a balanced, structured reflection of a specific area;
- Are clear and use examples of the behaviour and the context in which this was observed; and
- Outline the potential benefits of a change in behaviour.

The following passages provide two examples of constructive, supportive feedback:

*“Her strong work ethic, whilst in many ways a good thing, may also be seen as a weakness. I get the impression that she is juggling too many things on occasion. She would benefit from identifying the key tasks she wishes to undertake and to delegate the other tasks to her team. This will also allow her team to feel more valued.”*

*“Although very approachable, he can seem a little reserved to people not familiar with him. He could benefit from becoming more vocal within the team – when he does contribute it’s invariably well received.”*



# Tim J Smith – MCA Food-to-Go Conference

6 February 2019

*“Helping every Consumer make the right choice”*

## **|THE RISE OF AN EPIDEMIC**

Let me start with a word of introduction.

As you know, I was asked to lead a review of Pret’s food policies and to set up a food advisory panel.

So although I am working closely with the leadership team to provide that advice, I am here today in an independent capacity...to talk about an issue which is top of minds for many of us in the food industry: the rise of the impact that allergic reactions from food and drink consumption have for consumers.

Everyone can see the challenge: across the UK, it’s a public health phenomenon.

There are now some two million people in the UK living with a food allergy. Between 1995 and 2016, there was a five-fold increase in UK peanut allergies. Allergies now affect around 7% of children in the UK.

Thankfully, the number of deaths is still low compared to food poisoning – around 10 a year, as opposed to > 500 deaths from food poisoning. But the numbers are on the rise. According to the NHS, there were 5,357 admissions of critically ill patients due to a food reaction in 2017, compared to 4,162 in 2015.

It’s essential we respond in the right way. That means showing leadership to do the right thing, rather than waiting to be regulated into taking action.

Our starting point should be that this is not insurmountable. This is a problem which can be fixed. With the public gaze fully on the

issue, and many of Britain's finest medical experts looking into it, I am confident we'll be able to understand the root causes.

In the meantime, it is up to us – the industry – to work with the government, campaigners, our suppliers, and the whole allergy community to make sure that every consumer can make a safe choice.

But right now, we are falling short...

Living with a food allergy is difficult enough without us all making it worse.

## **EMPOWERING THE CONSUMER**

If you are a someone with an allergy buying lunch on the high street today, what you see in many shops and restaurants are warnings signs about the potential for cross-contamination, reminders to ask staff for more information, and directions to find full ingredient information online.

In other words, the message is “beware” rather than “we want to help”.

Years ago, we experienced something similar with the move to “may contain nuts” labelling. A catch all waiver, basically saying – we can't be sure this is safe for you to eat, so consume at your own risk.

A natural and understandable response. But put yourselves in the shoes of the two million-strong allergy community.... Now imagine the sense of helplessness and frustration if all you see everywhere are signs saying – “beware...”

It shouldn't be impossible to get simple, clear, and genuinely helpful information. We've done it before. Throughout my career, over 40 years in the industry, we've been able to improve the information we give consumers – from colour coded GDA traffic light information on nutrition, to Food Hygiene Ratings. On these

things, we've worked together to help consumers make the right decision.

The same thing should apply here. After all, we know that's what people with allergies want. They want to be helped, not inhibited, from eating on the high street. They want to feel included and to make the right choice. But right now, the opposite is happening.

According to the FSA's recent survey, more than half of young people with a food allergy avoid eating out as a result of their condition. And only 14 per cent felt confident asking for allergen information when eating out.

We cannot have a situation where two million people feel locked out of simple, normal, everyday experiences – something as straightforward as going to a shop and buying lunch. It's wrong for them, and it's bad for our businesses.

So we have to find a different approach...and that takes me to the work we're doing at Pret.

## **PRET REVIEW**

I think we have all been struck by the tragic, devastating, heartbreaking deaths of Owen Carey, Natasha Ednan-Laperouse and Celia Marsh. It is my job to try to reduce the chance of future tragedies – and to make sure Pret's policies are robust for the long-term.

We should all be clear just how much suffering is caused when things go wrong – even simple and honest mistakes in a kitchen. At its worst, the result is real physical harm and even hospitalisations. But even when there isn't a physical impact, a mistake can cause huge personal distress.

We have to do everything we can to reduce the chances of that happening – while also making sure we have the right processes in place to take rapid action if there is an incident.

In carrying out our review, we've deliberately taken an end-to-end perspective – looking at everything from the supply chain through to the service provided in Pret's shops. We've worked hard to seek the opinions of leading experts in this field, Britain's allergy campaigners, as well as policymakers, regulators and of course people with allergies themselves. And we've considered the current landscape of regulations and food safety laws.

There is still more to do, but we are making progress. In particular, the principle of Pret's future food policy is clear: *we want to make sure that every Pret customer has the information they need to make the right choice for them.*

## **KEY AREAS FOR CHANGE**

To do that, the business has embarked on a number of changes. These start with the way we think about allergens, through to the labels we are placing on freshly made products. Changes have been made in staff training, product handling, it's changed the priorities of the company in a profound way.

But one unusual issue we as an industry, together with the Government, need to address is the delay in being made aware of a critical incident....

What you can see on the slide behind me is a timeline of the changes Pret has made over the last two years around its allergy policies. What is striking here is the gap you can see between the death of Natasha Ednan-Laperouse in July 2016 and Pret being notified of the tragic incident by the coroner in March 2017. A gap of almost nine months.

This delay is not unusual in incidents of this nature. But it is completely unacceptable. When you look at other industries – rail, air, utilities – if there is an incident which leads to fatalities, there is

a way of notifying all parties immediately about what happened. We need to find something similar here.

So the first step is to improve our process of serious incident reporting – perhaps we should have a mandatory registration of allergen related deaths and serious incidents? PHE has a notifiable diseases plan which could easily be extended to include allergens.

But beyond that, we also need to help customers have the power to take the right decisions. And as I look at Pret and the whole industry, there are four clear areas for food information to be improved:

- Pre-packed
- Loose
- Hot food and soups
- As well as Barista-prepared drinks.

It will require a huge amount of work given the vast menu choices available.

One of the most significant pieces of work we've begun to address is the pilot for full ingredient information on all freshly made products. This pilot is now live in a number of Pret's London shops.

I know that this change has provoked concerns within the industry – but as someone who was involved in the development of the existing regulations, they were never designed to distinguish between the size of the food operator.

Instead, the way in which food allergen information is presented is determined by the method by which food is prepared for sale to consumers. Food operators who prepare and package fresh food onsite in the same way all follow the same labelling rules by virtue of their business type, not their size.

Of course, there are significant operational challenges in implementing full ingredient information on all freshly made products. It's a huge challenge and logistically difficult. But the principle of this approach is surely right. As someone who has worked in both the retail and food-to-go sectors, I cannot see why the principle of full information should not apply in each.

Over time, I believe technology might provide a better solution than printing lots of labels. But right now, this is the most responsible and helpful approach.

We also need to stop defaulting to precautionary allergen labelling – effectively the modern-day equivalent of “may contain”. This of course has the effect of moving the responsibility to the individual. Why?

Because the industry has not yet done anything like enough to provide consumers with the information they need to make a safe choice. So this approach gets the balance all wrong.

Precautionary labelling should only be used where there isn't a good manufacturing practice which could be applied to mitigate the risk. The default should be that there is a way to avoid those risks.

All of this is critical to creating a truly helpful and inclusive environment for people with allergies.

## **FOOD ADVISORY PANEL**

We're implementing these changes as fast as possible. The plan on full ingredient labelling is begin the national roll-out later this year. But to make sure that all of Pret's policies can reflect the views and wishes of the full allergy community, we will also be working with a Food Advisory Panel to advise the business.

Our first meeting will be next week. The Panel will be composed of experts across food standards, consumer protection, industry

regulation, medical expertise and allergies. They will help Pret deliver on its promise of driving meaningful change on the issue.

I will also shortly share the findings of my Food Safety Review, to help other businesses give their customers the information they need to make positive choices. This will include a set of recommendations that Pret will review and consider adopting, some of which they will have already taken forward, such as full ingredient labelling.

## **TRUST**

Our hope is that by taking this approach we can support change across the industry and reduce the chances of future Natasha's, Celia's and Owen's. It will take a bit of time – because it always does. But we have to do that and work together to get there.

In the end, it's about trust. Giving people confidence and empowering them to make the right decisions. We can either take action now, or start to lose the trust of millions of consumers....

...because in the end, warning signs won't wash when two million people in the UK have food allergies. We need to listen and we need to do the right thing.