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Regulating the Future – The Food Standards Agency

A CECAN Evaluation and Policy Practice Note for policy analysts and evaluators

This Evaluation, Policy and Practice Note (EPPN) summarises work completed on behalf of the Food Standards Agency in its efforts to draw up an evaluation plan for the Regulating our Future (ROF) programme, and the lessons learned in the process.



Why is this policy area important?

The goal of the FSA's Regulating our Future (ROF) programme is to modernise the regulation of food businesses in England, Wales and Northern Ireland. This is needed in part because the food industry itself continues to undergo change, and because the conditions for the current regulatory regime to operate cannot be sustained in the long term. In order to guarantee consumers that food is "safe and is what it says it is" (a core objective of the FSA) the "regulatory regime" (as understood by Hood et al. 2001) for food needs to be flexible and agile to respond to technological changes and address potential problems before they occur. The ROF programme has several workstreams, which are intended to lead to an overall regime of food regulation that is effective, risk-based, and sustainable. The workstreams are:

- **Registration** – A new registration regime has been developed for all new food businesses, providing a centralised system that is compatible and interacts with local authorities' own registration systems and documents a set of characteristics for all food business operators.
- **Segmentation** – A 'risk engine' has been designed and developed to assign risk scores to businesses to identify which ones are most at risk of non-compliance. The risk engine will be especially useful for risk-based inspection programmes.
- **Assurance and standards** – A new approach has been developed for setting and maintaining standards and integrating different elements of the assurance model into a coherent and resilient whole.
- **Sustainable funding** – The FSA aims to transform the funding regime for official controls and to achieve full recovery of the costs of regulating industry.
- **Food standards** – Improving the regulatory regime for food standards is one of the more recent workstreams within ROF.

What are the evaluation challenges?

The FSA's ROF programme presents several challenges for evaluation:

- The workstreams are operating concurrently, each with their own mandates and goals. Hence, all workstreams cannot be captured through a unified framework of shared objectives and indicators;
 - The workstreams are at different stages of development and deployment. It is not possible to define milestones and document impact at the same moment in time for all workstreams;
 - The workstreams are linked to one another through inter-dependencies of various types and strengths, with developments in one workstream feeding back into another. Workstreams cannot be evaluated separately from one another;
 - The overall ROF programme will be implemented in phases. The specifications of the evaluation cannot include a fixed schedule set in advance of the ROF programme unfolding; and
 - There are many different actors and stakeholder groups, including- local authorities, which need to be involved throughout the programme’s implementation. The evaluation may create a burden on those stakeholders and local authorities in particular, which some may not have the capacity to bear.

As such, the structure of the ROF programme is complex and any approach to evaluating ROF should seek to encompass this complexity.

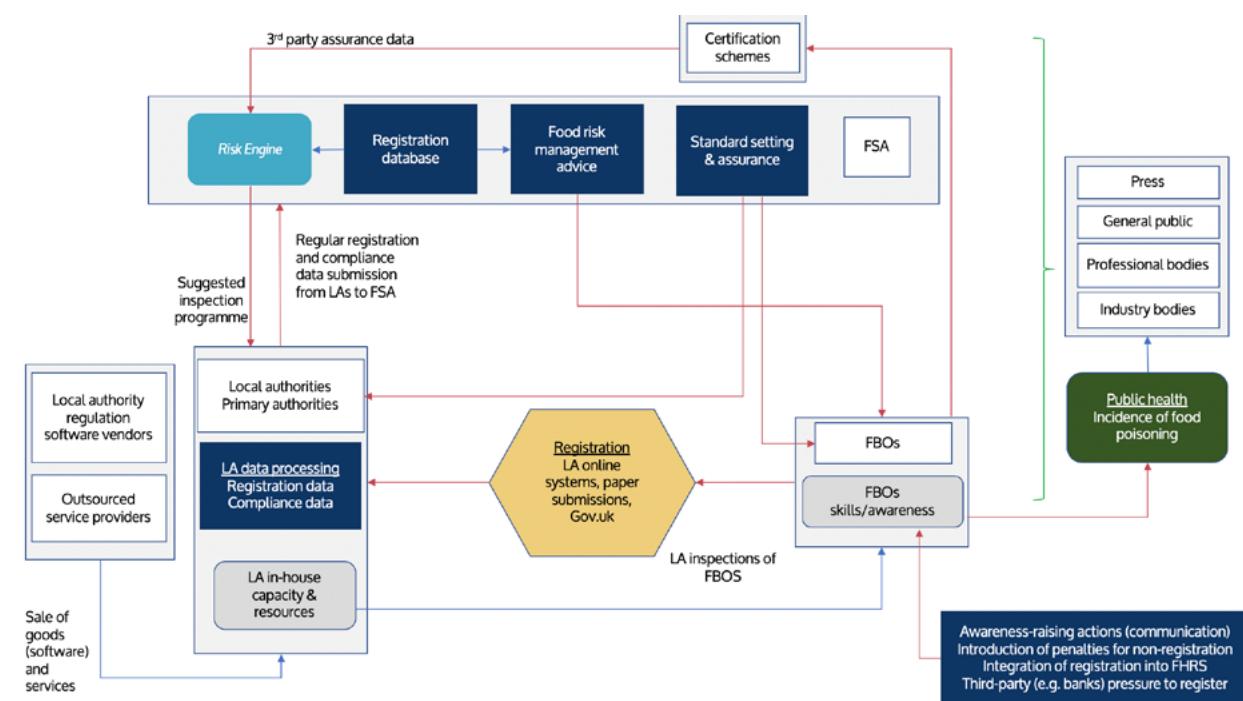
What activities were carried out and why?

As a preliminary step to understanding how best to evaluate ROF, the team used various approaches to **systems mapping** to identify:

- the different actors involved in the processes the workstreams mean to change or create;
 - the problems and challenges that the programme means to address and where – at the intersection between which actors and in relation to which activity – they are found within the current system;
 - the sequence of steps involved by the changes ROF introduces into the system, and how they will unfold over time;
 - the key success factors that will enable the intended processes to take place and the intended objectives to be achieved; and
 - how the workstreams are linked to one another, and the key interdependencies that may translate into mutual impacts.

This mapping helped the team identify which factors in the system may contribute to shaping ROF's success. The systems mapping was informed by interviews with key members of FSA's staff involved in each of the relevant workstreams.

An example of one of the maps generated in that process is presented below:



The approach taken to mapping was **emergent**. Several different examples were produced and refined, and these were used as a basis to develop an **intervention logic** and final systems map that will be used to underpin the evaluation. In particular, the **systems map** highlighted the need for:

- an evaluation design that allows for learning and adaptive programme development;
- an impact evaluation; and
- a process evaluation.

What learning and insights did this case study produce?

The case study led to recommendations to the FSA on the design of an impact and process evaluation of the ROF programme. At the same time, the ongoing and long-term nature of ROF's roll-out means that an evaluation at an early stage provides a useful opportunity to learn.

Evaluation for learning

Because the roll-out of ROF will be happening over time, its evaluation provides a key opportunity for learning and improvement as the programme progresses. This means that an evaluation could include measures to support adaptive programme development.

Impact evaluation

The different timelines both between and within workstreams make evaluation challenging—in part because it will likely take some time before the target effects accumulate to the point where they are measurable. However, this phased implementation of ROF also creates an opportunity for comparison which could form the basis for an evaluation of impacts.

This approach could use the phased roll-out of the ROF programme to compare data between 'with treatment' and 'without treatment' areas for various elements of the programme. A large share of the implementation of food regulation is delegated to Local Authorities. The impact evaluation could rely on a comparison between Local Authorities. This would take into account other factors which may shape outcomes of interest, and identify comparable LAs accordingly.

If individual local authorities (and Food Business Organisations in their jurisdiction) can be taken as being in one of two binary states for 'treatments' that are expected to trigger particular outcomes (e.g. improved public health), then comparison of data taken from across the local authority population may reveal treatment effects while controlling for other influences on the economy, local authority operations, FBO behaviours, etc. Successive waves of sampling would show whether impacts are emerging and growing in scale as the roll-out of the programme progresses. However, the pattern of uptake by local authorities may not be random and early adopters could differ significantly from late adopters, and several factors external to ROF could influence outcomes. This means that any comparisons used will need to be tested through in-depth case studies and small-N comparisons between comparable LAs (e.g. Etienne et al. 2015; Lee-Wolf et al. 2015).

Process evaluation

The complexity of ROF – particularly its reliance on multiple workstreams with interdependencies at different points in development – calls for an evaluation of not only its impacts but also its process. The process evaluation could rely on more qualitative data (interviews, surveys and case studies) from actors across the system to gather information on experiences, perspectives and motivations. The design of the process evaluation could be based on systems mapping exercises, the focus of the research following this mapping, shifting over time to adapt to the progress of the different workstreams.



| What are the implications for future policy evaluations?

This case study illustrates that for many evaluations, particularly complex ones, no single approach to evaluation will likely be sufficient.

It also points to the opportunity that beginning the evaluation of long-term projects early-on and in parallel to roll-out can bring. Early evaluation allows evaluators to establish baselines and required measures before significant impacts happen and to use the phased roll-out of programmes to gather data in a meaningful way. It also allows for policymakers to directly benefit from the results of evaluation and, where need be, adjust policy design during implementation, rather than waiting for the results of a post-implementation evaluation.

References

- Etienne J, Munnik M, with J Dzakula & H Shah (2015) Post-implementation study of the introduction of Remedial Action Notices (RANs) for non-approved businesses in Scotland, Wales, and Northern Ireland. Food Standards Agency.
- Hood C, Rothstein, Baldwin R (2001) The Government of Risk: Understanding Risk Regulation Regimes. Oxford: Oxford University Press.
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The Centre for the Evaluation of Complexity Across the Nexus (CECAN) is a £3m national research centre hosted by the University of Surrey, which brings together a unique coalition of experts to address some of the greatest issues in policy making and evaluation.

This Evaluation Case Study Policy and Practice was written by Julien Etienne and Kate McEntaggart.

CECAN has developed a set of co-produced case studies, working with government departments and agencies to tackle their intractable evaluation challenges in complex policy area. These case studies have involved sustained dialogue and an orchestrated succession of activities and relationship building. They are providing experiments in bringing together the expertise of evaluation practitioners, methods and domain specialists, social and natural scientists and policy analysts to develop shared understandings of evaluation challenges and to identify evaluation needs and solutions.

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