Food Allergy Reporting Discovery Service assessment

Context

Service assessments form part of the FSA governance process for service developments. They act as an assurance, rather than a gateway.

We are not specifically assessing against the Government Service Standard as it is not designed for projects in a Discovery phase.

Discovery figures out if and why we should build a product.

We're looking for a team to have found out:

- is there a problem?
- is it valuable to solve?
- is it possible to solve?
- is it urgent?
- is it pervasive?
- can users solve it themselves?
- has someone solved it already?

We're looking to see the team has tested their riskiest assumptions about the problems through research.

Assessment process

We are trialing a combination of team self-assessment and panel assessment.

Self-assessment

The team will self-assess against seven criteria and present this to the panel.

The team should take some time to consider the questions within each section and provide their own score and written assessment.

Keep your assessment to no more than 50 words per section.

Please complete this prior to the service assessment and send to the panel beforehand.

Panel assessment

The panel's role is to probe and offer feedback on the work completed so far and recommendations arising. Like the self-assessment, the panel will frame their observations around the following:

- Something the team did well
- Something the team has learnt
- Possible gaps
- Reflections/recommendations

Assessors may wish to lead on the specific criteria. For example:
- Framing initial problem
- Identify types of user
- Understand strengths and weaknesses of user experience
- Identify key business challenges
- Identify key recommendations and possible areas of focus for any proposed next phase
- Engaging stakeholders
- Working in an agile way

Discovery name:

Food Allergy Reporting Service

Discovery Team:

Hannah Rose - Product Owner
Stephen Blackmore - Delivery Manager
Sue Andor - UX (User Experience) Designer
Rohela Raouf - Business Analyst
Elsa Eugene - Subject Matter Expert
Ross Yarhman - Subject Matter Expert

Assessment panel:

Diane Barlow - FSA Head of Digital
Alex Coley - Director, Epimorphics Ltd
Tim Horobin - FSA Lead User Researcher (unfortunately early during the panel session, Tim had to drop off the call, so had little chance to contribute)

Date of assessment:

The assessment was carried out in the Food Standards Agency, Clive House, London on Wednesday 22nd January 2020. Hannah, Product Owner and Alice, SRO dialled in to the session from FSA Cardiff office.

Assessment Outcome:

Proceed to Phase Two of Discovery *with recommendations*

Assessment panel summary observations

The multidisciplinary team formed well with a blend of suppliers and an empowered product owner from the business. They have established a focused and achievable scope, engaged well with each other and their stakeholders and implemented efficient and sustainable agile working practices. Some of the corporate knowledge and lessons from previous discovery activities may have been re-learnt during this discovery, potentially resulting in these phase one clarity of outcomes taking longer than may have been the case.

The team demonstrated a clear, coherent and credible justification of the overarching user needs of Food Allergy Reporting. They also highlighted the essential work required to draw out the FSA's data needs.

In undertaking that work, broader consideration should be taken of the wider approach the FSA takes to receiving different types of reports via digital services (for example report a food problem) and the user journeys that are followed.

Ultimately, we have learnt that there is a clear need for people living with a food allergy to be able to report an allergic reaction and near misses

However, it seems much-less clear if the FSA is the right organisation to meet that need, if so why and also if it is able to within the wider complexity (at a minimum without significant engagement and agreement of other key organisations).

It looks like the team have delved extensively into a whole set of core questions - and evidenced some of the end user challenges. BUT potentially weaker is the clarity on if the FSA itself owns this or if it sees it as enough of a priority to put in the level of commitment to make it a success.

The FSA need is to collect robust data to inform, and improve future policy. Can this be done in other ways e.g. surveys? - more broadly have enough alternative approaches been considered? Are the benefits of a service as described highlighting lots of high quality data actually credible?

The FSA should consider the scope of a future discovery phase carefully. This should include the associated user journeys, its overall strategy and critically what its priorities are in this area.

Recommendations

- The FSA considers the scope of a phase two and where that sits in understanding this "reporting an issue" alongside other similar aspects within current FSA services (especially those offered through the FSA website). The FSA needs to have a consistent strategy. For example there are multiple similar report a… where the user journey starts on the FSA website. These should be considered to assure a consistent strategy.
- FSA (Discovery Team) should undertake social media analysis to size the problem and explore long term potential alternative intelligence.
- The FSA (Discovery Team) should explore the current FSA website usage including search to help understand the likely service usage.
- The FSA (ODD) and our suppliers (especially those involved in Discoveries) should review how it captures corporate knowledge for cross-cutting aspects of projects so that less time is spent re-learning. For example the LA landscape, processes and systems.
- That specific Business Needs for specific data items for allergic reactions are drawn out against each potential option for meeting needs.
- There are potential significant GDPR data challenges in collecting allergic reaction data. The FSA should look to reassure itself that it understands the data it would hold, implications and what could be shared more widely.
- Ensure a sustainable multidisciplinary team is in place before commencing the next phase with wider input from beyond the FSA policy team (ensuring the ODD Data Team is engaged).

Assessment panel observations

User Needs

The team have a good well articulated understanding of the needs of users, who wish to report a food business. The team also recognised the gaps in the evidence that they currently had, with coherent strategies for approaching those gaps. They managed to convey confidently that there is a good grasp of a number of delivery challenges that need to be explored in the proposed next phase of discovery and are not blind to some of these in exploring options to meet the differing needs.

The team very clearly highlighted some of the current pain points of a member of the public that wants to report an allergic reaction incident.

The team demonstrated a good grasp of the types of external service users and these were documented clearly and digestibility in the persona documentation. The overall population percentages give a good top end estimate for the sorts of affected people but further research is needed to give the FSA a sense of the likely throughput of different reporting solution options. The panel didn't see direct evidence of current FSA website search term analysis or other page analytics as a proxy for likely initial user numbers. The panel recognised that this is a challenging area and that more work would be expected in future activities.

The team developed a good survey methodology that worked well, and delivered an impressive number of credible responses. The team recognised that this approach may also provide an alternative method for meeting the FSA's own data gathering needs.

The team highlighted that there is a plan for understanding how to design a service that meets accessibility guidelines, but have not yet carried out research with users who have specific access needs. The team should consider how you will gather that insight in a way that informs each of the future potential service options.

Data
The team recognised there are significant gaps in understanding what data is needed by the FSA or upstream users (other organisations). The team had credible answers for how they had explored what users appetite is for sharing a range of possible data would be, including a good range of the more challenging personal data (including protected characteristics).

There are clear potential significant GDPR implications. The team recognised the need to explore these in a way that demonstrates the risks, the needs and the impacts through differing options. The panel highlighted that the complexity in this area should not be under-estimated. Wider Stakeholders.

The team demonstrated a coherent strategy for how it worked to gain insight from a core set of stakeholders in the ecosystem.

In any future phase there is a need to make sure that assumptions of England only public bodies are not taken as representative of the other administrations without evidence.

The legal duties of the FSA and the wider needs were recognised by the team as complex, with some blurry lines between the FSA's oversight role and need to help coordinate effectively.

The Team and Ways of Working
Good agile processes within the team - the engagement with the core set of stakeholders also came across really well, with a knowledgeable and engaged product owner. There seemed to be good join up with some of the key stakeholder groups within the FSA. It is really good to see the engagement level with the wider policy team. Also note that the weeknote summaries of the sessions were really helpful additional context.

Engagement with the ODD function appeared more limited in this stage of the discovery. This may pose some risk in bringing those aspects up-to speed in the proposed next phase.

The panel appreciated the balanced and thoughtful responses to challenging questions around some of the approaches taken and in particular where the key knowledge gaps remain.

Week notes were very useful (as in previous assessments) in getting not just the overview but how things evolved. The wider wiki is a little lacking (but that may not be an issue). Preparing for this assessment there is a feeling that less of the detail has been shared than previously. It may not exist though.

Discovery Team self-assessment:

What was the initial problem you were asked to look into?

Team score: <u>Met</u>/Partially met/Did not meet

Context

A number of problems have been acknowledged relating to the reporting of food allergies in the UK, including:

- Allergic reactions to food are currently under reported
- It is difficult to report allergic reactions
- There is no uniform method of reporting allergic incidents - reporting methods vary widely.

Collectively, these problems are potentially creating avoidable risk to allergic consumers.

The Food Standards Agency believe having more good quality data relating to allergic reactions to food within the UK will help determine the most effective policy to help reduce avoidable risk.

The FSA commissioned NotBinary to explore a way to collect data from the general public through reporting allergic reactions and near misses in order to improve future prevention

The **primary objective** of the Discovery was to determine:

- what needs a food allergies reporting service would meet
- who would use it
- whether it is viable
- it's impact on local authorities and a number of other wider service considerations

Size of problem

There are approximately two million people currently living with a diagnosed food allergy in the UK. This translates to around 2% of adults and 8% of children.

Food hypersensitivity is responsible for more hospitalisations each year than foodborne disease.

On average 10 people die each year in England and Wales from food allergy.

Team observations

Something the team did well

As with all Discoveries, the ability to conduct quality research in a relatively short period of time to establish a deep understanding of the stated problem is critical.

Understanding this need to work at speed, the team worked closely with the Product Owner (even before formal kick off) to quickly set up interviews with a wide range of stakeholders.

Keeping up the pace throughout Phase One, the team then managed to design and publish an online user survey which provided a considerable amount of qualitative, first hand data about users.

Something the team has learnt

Ultimately, we have learnt that **there is a clear need for people living with a food allergy to be able to report an allergic reaction and near misses**.

There are a large number of organisations involved in reporting when people experience allergic food reactions, including:

- Hospitals
- Local authorities
- Food Business Operators (FBOs)
- User groups
- Third sector organisations operating in the food allergy space e.g. NTAssure, FoodAlert
- Food Standards Agency (Incidents and Resilience Unit), 'Report A Food Problem' service

However, the data collected isn't standardised and is very fragmented.

Possible gaps

Given that the clinical community currently collects a significant amount of data from people who have experienced an allergic reaction to food, it would have been useful to bring this community more into scope of the Discovery. This is partly to get a better understanding of how data is currently collected, analysed, shared etc within the clinical community, but also because it may have a legitimate role to play in a potential reporting solution.

Reflections/recommendations

We recommend the FSA work closely with the PHE pilot to develop a clinical reporting route in addition to this Discovery.

Identify all of the types of users

The team should have a good understanding of user needs, understand what users are trying to do when they engage with the current service. including those who may not be able to use a digital service

Team score: Met/Partially met/Did not meet

Team observations

Something the team did well

The team successfully created an online survey that received 549 responses over the Christmas and New Year period. This was a lot higher than expected. The survey's 27 questions provided valuable insight and understanding into a number of key themes, including:

- Motivations about reporting
- Understanding behaviours from past reporting
- Understanding their awareness re. ability to report
- Attitudes to reporting reactions from different food types
- Feelings about sharing personal data

Something the team has learnt
There are five main types of user personas of people living with allergies to consider as part of a potential reporting solution:

- The non-believer
- The avoidant
- The extremist
- The proactive
- The opportunist sub persona

Possible gaps

The 'opportunist sub persona' are by their very nature quite difficult to reach. The vast majority of survey respondents categorised themselves as having a medically confirmed allergy. However, anecdotally the team believe there is likely to be a significant number of 'self diagnosing' people who have some form of negative reaction to food. Consideration may need to be given about how to engage with these users as part of this work.

Reflections/recommendations

So far, the team has focused on establishing the user need for a reporting solution. For Phase Two, we will concentrate on accessibility considerations.

Understand the strengths and weaknesses of their experience today and develop hypotheses about what an ideal service would do

Team score: Met/Partially met/Did not meet

Team observations

Something the team did well

Through the online survey, the Discovery team have learnt that 27% of respondents have previously reported an allergic reaction to food. This is somewhat higher than was expected prior to the survey. This suggests that people are successfully using some of the existing reporting tools available, which could be considered a relative strength.

However, a majority of respondents haven't reported previously simply because either they don't know that they are able to report their experience to anyone (53%) or they are unsure who to report to (14%). This suggests there is a weakness regarding general awareness about reporting amongst people living with food allergies.

Something the team has learnt

One of the key aspects of an ideal solution will be to inform users of any outcomes following their reporting an allergic reaction to food. 97% of survey respondents expressed it was either 'very important' or 'somewhat important' to be informed about any potential outcome.

Possible gaps

There are currently a number of areas that need a deeper dive in Phase Two (other areas outlined in the next question) to help inform our emerging thinking about what an ideal service would do, including:

- What data does the FSA **specifically** need?
- How could we use some of the third parties more effectively?
- What are the discoverability considerations?
- What are the usability principles any solution should consider?
- How would any solution reach the 'harder to reach' parts of the industry e.g smaller operators

Reflections/recommendations

The team will need to explore the points outlined above in more detail for Phase Two to help inform the emerging ideas to a point where recommendations for a potential Alpha can be made.

Identify the key business challenges and the type of improvements that are possible

For example: cost savings, customer satisfaction improvements

Team score: Met/Partially met/Did not meet

Team observations

Something the team did well

One of the first activities the team did was to understand the FSA's initial data requirements.

Targeted, one-on- one stakeholder interviews provided the team with a solid understanding of the key business challenges facing the FSA (and potentially other stakeholders) regarding the creation of a reporting solution, including:

- What will the FSA do with the data? E.g. what would it consume versus push out to LAs? Similarly, how would outcomes be subsequently reported back to users if the FSA is the initial reporting channel but it is subsequently followed up (actioned) elsewhere?
- What could be the relationship with a potential reporting service with the IRU and 'Report A Food Problem' service?
- What are the potential data rules and considerations e.g. security and the viability of a data standard
- What are the cost and resourcing implications for the FSA (and others) for a formal versus more informal approach?

Something the team has learnt

The research has clearly confirmed the desire for people living with food allergies to be able to report an allergic reaction (actual or narrowly avoided). Establishing a tool built around their specific user needs has the potential of raising the profile of allergens across the UK.

However, if there is going to be an FSA owned and managed reporting solution, one of the key challenges for the FSA will be how it will establish awareness of the solution amongst people living with a food allergy.

As the research has evidenced, there are a large number of users who simply aren't aware of the ability to report an allergic reaction to food. There is likely to be a significant time and cost implication for the FSA to raise awareness and discoverability of any solution to ensure there is enough 'take up' to justify the investment.

Possible gaps

There is still a gap around what the FSA wants any potential solution to do e.g. will it just be a data collection exercise or will it lead to some form of investigation, if so, what will that be and who will do it?

Reflections/recommendations

For Phase Two, the team wishes to establish more details about the sort of data the FSA wishes to collect, how this compares to what is currently collected elsewhere and what the implications may be for a potential data standard.

Identify key areas of focus for the next phase of work

For example: a part of the customer journey that is causing particular pain, or a part of the business process that could be easily automated

Team score: Met/Partially met/Did not meet

Team observations

Something the team did well

As a result of their analysis in Phase One, the team are developing ideas relating to a 'formal' versus a more 'informal' approach to collecting data from the general public relating to food based allergic reactions.

- A formal solution could be an FSA owned service/tool that is easily discoverable and easy to use
- An informal solution would be more light touch, using a combination of approaches e.g. proactively scanning (and responding to) comments in social media, working more closely with third parties to stimulate and incorporate innovative ways of collecting data e.g. iwaspoisoned.com.

It's important to note that any potential solution isn't necessarily to choose one or the other i.e. it could be a combination of both approaches.

Something the team has learnt

Key elements to the success of any solution will be:

- Discoverability of the service
- Why it is important to report
- How to do it

Possible gaps

Understand how other comparative government agencies have raised awareness of their reporting solutions

Reflections/recommendations

Ultimately, any recommendations for a potential Alpha will need to seek to address **both** the user need i.e. to report an allergic reaction to food whilst giving the FSA the data it needs.

This is what we will be exploring in Phase Two of this Discovery.

Align stakeholders around the definition of the problem and recommendations

Team score: Met/Partially met/Did not meet

Team observations

Something the team did well

Before the Discovery kick off, the Product Owner and SMEs identified the key internal stakeholders interested in the Discovery work.

From this list, senior stakeholders, including the SRO, attended a formal kick off session to confirm/agree the overarching hypothesis for the Discovery.

Subsequently, at the beginning of each show and tell, the team presented a reminder of the aim of the Discovery and the problems it was seeking to address i.e.

- Allergic reactions to food are currently under-reported
- It is difficult to report an allergic reaction to food
- There is no uniform method of reporting allergic incidents - reporting methods vary widely

More widely, we conducted 22 interviews with non-FSA stakeholders throughout the Discovery. There was a wide consensus amongst interviewees that the Discovery hypothesis was correct and it was a problem worth exploring.

Recommendations have yet to be made at this stage of the Discovery.

Something the team has learnt

Within the world of allergens, language can mean different things to different types of users and stakeholders. For example, the term 'near miss' is likely to mean 'avoided a fatality' for clinicians or people with very severe allergies. However, it can also be interpreted as when a user 'almost consumed an allergen but didn't'.

The team has subsequently avoided using the term 'near miss', replacing it with 'narrowly avoided'.

Possible gaps

No further discovery work needed in this area.

Reflections/recommendations

Local Authorities have expressed their desire for the FSA to provide a knowledge sharing role between NHS and themselves. The current gap in knowledge sharing has resulted in, for example, certain Local Authorities finding out about deaths in their area via the press or coroner.

At the moment there is no legal requirement for hospitals, GPs or LAs to share information with one another.

This should be explored by the FSA in more detail.

Demonstrate how the team has worked together using agile methods and the learning from this

Team score: Met/Partially met/Did not meet

Team observations

Something the team did well

Agile ceremonies were used throughout the Discovery, including:

- Daily stand up
- Weekly show and tell
- Weekly retrospectives
- Weekly planning sessions

These ceremonies were a new experience for FSA team members, but were well attended and a useful way of keeping a 'regular conversation' between the core delivery team members (i.e. Not Binary) and the FSA. This inclusive approach ensured there were no surprises along the way (client side) and the team were well supported throughout.

Something the team has learnt

Agile working, particularly discoveries, require working at pace. Often quick answers are needed. Structuring the Discovery around the agile ceremonies, described in the previous point, ensures that avoidable delays have been kept to a minimum.

Possible gaps

The team would have benefited from a dedicated working space (as it had for the IRU Discovery), although we managed to work around this to a degree by using Aviation House for the critical analysis phase.

Reflections/recommendations

The team has found the 'two phase' structure of the Discovery process somewhat disruptive, both in terms of the team's time (including completing this document when the Discovery is not yet completed) and maintaining momentum in developing our ideas. .

We feel it would be better to conduct the Discovery in one, clearly defined period of time without the self-inflicted 'pause' halfway through, which is the more traditional approach.