

Risk Communication

Summary

This paper provides an update on progress for the working group *Risk Communication*. It summarises background, key activities and future action. This paper is for information and discussion.

Background

It is often the role of Government bodies to communicate to influence behaviour or empower choice through communicating the evidence base and its assessment of the risk associated with particular choices.

However, to be scientifically defensible means speaking with a degree of honest uncertainty; difficult within a political and media environment that lends itself to misinterpretation and reductionism. Added to this, food is something that people are personally highly invested in; there is little that is closer to home.

Once the UK leaves the EU and responsibility for risk assessment devolves to the FSA/FSS, it will be more important than ever to have a robust framework for the communication of food risk.

Working Group

To this end, the ACSS were asked to help ensure that the best possible evidence base supports the development of a risk communication framework for the FSA. This includes:

1. a gap analysis of the Science Council principles, and advice on how best to turn them into a workable framework,
2. academic support on a review of the existing risk communications frameworks, understanding their evolution, how they are used, and what are the learning points one might take forward, and
3. advice on a draft risk communications framework. This includes establishing how we can maximise its usefulness and usability, identifying the questions and checks required to communicate risk in the best known way in a range of situations and ascertaining the organisational practices required to do so.

To support and shape the successful delivery of this work, at the first ACSS meeting¹ a working group (WG) was established to help assure best practice and outcomes.

The risk communication WG is comprised of the following members:

Members

- Chair – Prof. Julie Barnett
- Julie Hill
- Prof. George Gaskell
- John McTernan

¹ <https://acss.food.gov.uk/acss-meetings/acss-meeting-15-may-2018>

- Dr Seda Erdem
- Prof. Spencer Henson
- Prof. Dan Rigby

FSA

- Steven Pollock
- Michelle Patel
- Sarah Kovacs

Key activities

Following the ACSS meeting, the risk communication WG has met and corresponded via email. It also held a working day on 24th October 2018 in order to offer a commentary and gap analysis on the Principles for Communicating Risk and Uncertainty that were developed by the Science Council. This commentary is attached here as an Annex. This will feed into the Board's discussion of the proposed risk analysis frameworks for the FSA post-EU Exit.

Future action

The Working Group agreed to meet again for a further working day in Q4 to fulfil objectives 2) and 3), once the risk analysis framework has been discussed and agreed by the Board in principle, and the guidance for application in practice is under development.

Discussion

This paper is for information and general discussion.

Professor Julie Barnett, ACSS WG Chair

Michelle Patel, FSA

Commentary on the FSA Science Council Principles on Communicating Risk and Uncertainty

FSA Advisory Committee for Social Sciences

24/10/2018

Introduction

The ACSS working group on risk communication were asked to give their commentary on the FSA Science Council [Principles](#) and [Recommendations](#) on Communicating Risk and Uncertainty in order to feed into the development of a risk analysis framework for the FSA.

Overall response to the recommendations

The working group broadly endorsed the recommendations of the Science Council, and offer the following clarifications and emphases.

1. On recommendation 3 – that the FSA develops an appropriate form of documenting compliance with the overarching approach for establishing risk and certainty to ensure operational transparency, consistency and quality management.
 - **The WG thinks that this is particularly important to ensure meaningful and consistent communication of risk from risk assessors to risk managers.**
2. On recommendation 5 – that the FSA keeps under review the principles and the way that the principles are implemented to ensure that they reflect changes in:
 - a) The state of the art in approaches to risk analysis, both conceptual and technical
 - b) The types of risk that need to be considered and the challenges these present such as increasing complexity
 - c) The wider context in which the risk analysis takes place
 - **The WG would be interested in understanding what the review process will be and whether there would be a role for internal audit to ensure that processes were a) correct and b) implemented effectively**
3. On recommendation 7 – that the FSA ensures activities relating to risk analysis are fully joined up across the FSA including its advisory committees, for example by holding an annual workshop
 - **The WG is reassured by the presentation of one joined up risk analysis framework covering risk assessment, management and communications but wonders whether an annual workshop is the most effective way to ensure consistent implementation.**
4. On recommendation 8 – that the FSA consider types of risk other than those that directly relate to impacts on health (such as related to food authenticity and fraud) in the wider application of its advice and consider whether the principles for health risks might apply or be adaptable to these other risks
 - **The WG believes that this is imperative and has considered their commentary on these principles in this light.**

5. On recommendation 13 – that the FSA considers consultation with the public (and/or other target audiences on planned communications to improve communications and help to reach intended audiences.
 - **The WG would like a clearer definition of ‘consultation’ – ie. does it follow statutory processes - and wonders whether ‘engagement’ would be a better term - or participation. Typically the term consultation tends to mean information flow from the initiator to stakeholders/citizens and then back again without dialogue. It is also associated with the range of options being consulted on tending to be fixed.**

6. On recommendation 14 – that the FSA draws on other organisations approaches and tools in considering its approach and works with others in developing good practice.
 - **The WG wholeheartedly endorses this recommendation and suggests that the FSA might also include risk communication frameworks from DH, PHE and those of international partners as well as those suggested by the Science Council. One of the objectives of the working group is to oversee a review of the relevant literature and a meta-analysis of the existing frameworks, and crucially, of what has made them useful and usable, including lessons learned from others who have operationalised such frameworks.**

Commentary on the principles

7. The Working Group considered the Principles that they felt pertained most to risk communications and would like to emphasise that risk communication occurs at various points in the risk analysis process. They welcomed the acknowledgement that advice on risk communication would be included that each point of the proposed FSA framework.

8. With that in mind, the Working Group would like to offer their commentary on Principles 3, 4, and 7 as well as 12, 13, 14 and 15, and some recommendations for consideration.

Science Council Principle	Science Council Commentary	ACSS WG2 Commentary
3. There should be effective dialogue between risk assessors, risk managers and risk communicators at all stages of the process, assuring a shared understanding of the question(s) to be addressed, and the planned outputs of the risk assessment.	<p>The mandate given by risk managers to risk assessors should be as clear as possible.</p> <p>Risk analysis is an iterative process, and frequent interaction between risk managers, risk assessors and risk communicators is essential.</p> <p>The question to be addressed (the problem formulation) must be discussed and agreed at the outset by risk assessors, managers and communicators and appropriate deadlines agreed.</p>	<p>The WG endorses this principle and the accompanying commentary and would like to emphasise that the underlying organisational processes should be developed to enable effective contributions from risk communicators at every stage of the risk analysis process. The benefits of establishing such processes might include:</p> <ul style="list-style-type: none"> • wider contextual input supporting problem formulation • transparency of any starting assumptions • early mitigation of risks to the FSA’s reputation <p>1. The ACSS recommends that a process be set up so that problem formulation involves the right people from the outset.</p>

	<p>Inputs and assumptions of the risk assessment and any associated uncertainties should be understood in advance of decision making by risk managers and communicators.</p> <p>Risk analysis should also involve dialogue with the public, industry and others who have an interest in and/or are affected by the conduct or the outcomes of the risk analysis.</p>	
<p>4. The assessment, management and communication of risks should reflect the characteristics of the risks. The risk analysis will need to set out the relevant factors, conclusions and assumptions and uncertainties, and their effects, in order to inform this process.</p>	<p>There are a number of ways to characterise risk. One way of doing this that has been looked at across government is to consider how the risks arise such as:</p> <ul style="list-style-type: none"> i) urgent/emerging; ii) slow burn – evolving picture which acquires its own momentum; iii) Government/Agency/SAC initiated action to raise the profile of the issue. <p>The different characteristics of risk (and the fact that these may change over time) needs to be taken into account; for example an initial slow burn issue may become urgent.</p>	<p>The WG endorses this principle and discussed the accompanying commentary at length. The WG agreed that while a time continuum was a decisive factor in how Government decides its response to risk, urgency might be determined by various factors, some of which might be:</p> <ul style="list-style-type: none"> • Imminent risk to public health • Risk to the FSA's reputation • Risk to public confidence • Socio-political impact • Degrees of uncertainty • Characteristics of the risk event (e.g. familiarity, voluntariness, dread etc) <p>2. The WG understands that each risk is unique and contextual and recommends that the FSA defines and agrees its potential prioritisation criteria, perhaps drawing on existing protocols for escalation of incidents, and makes their handling decisions transparent against these.</p>
<p>7. A risk assessment should capture the implications of uncertainties on the conclusion of the assessment. Sources of uncertainty and variability, and any measures that could be taken to reduce uncertainty and/or better characterise variability,</p>	<p>The consideration of uncertainty is an integral part of the risk assessment process.</p> <p>There are a number of dimensions to uncertainty, including the overall weight of evidence and gaps in evidence, and the robustness and applicability of the selected risk assessment methodology in any specific case.</p>	<p>3. The WG endorses this principle and recommends that the FSA establish a consistent and meaningful method of expressing risk and uncertainty (whether qualitatively or quantitatively) across disciplines to ensure consistent communication between risk assessors and risk managers.</p> <p>4. The WG also recommends that the FSA commissions an analysis of the various principles of how to best communicate risk and uncertainty to external</p>

<p>should be investigated and reported.</p>	<p>Expressions of uncertainty or variability in risk estimates may be qualitative or quantitative, and the tools and approaches used to characterise and express uncertainty or variability should reflect the needs of risk managers and risk communicators.</p> <p>The way uncertainty is expressed in formal or technical terms in a risk assessment (for example as a probability distribution of outcomes) may need to be translated into terms that risk managers can understand correctly and consistently and can act upon, in order to communicate messages effectively to different audiences (see risk communication principles below).</p> <p>Where a risk assessment is based on selected scenarios, uncertainties in the selection of scenarios should be clearly identified.</p>	<p>stakeholders and publics and tests its approaches, building on the considerable work that has been conducted about this.</p>
<p>12. The primary goal of risk communication is to ensure the interactive exchange of information and opinions throughout the risk analysis process concerning risk, risk-related factors and risk perceptions, among risk assessors, risk managers, consumers, industry, the academic community and other interested parties, including the explanation of risk assessment findings and the basis of risk management decisions. Risk communication should be open, honest, transparent and fully consistent with the scientific evidence available. It should cover uncertainty and knowledge gaps.</p>	<p>FSA needs to be flexible in the way it communicates with different audiences (such as in the communication channels and tone used) – one approach does not fit all. It is important to take into account how different people and groups perceive risks and uncertainty in framing communication so that it achieves its intended outcome.</p> <p>One way to characterise audiences and to adapt messages is to look at degree of expert knowledge in the area (as in the three levels of ‘entry level’, ‘informed level’, and ‘technical level’ proposed by EFSA in its guidance).</p> <p>Another important grouping of audience is by role (e.g. risk manager, stakeholder expected to take action on the basis of the messaging, or citizen wanting basic understanding of the issue).</p> <p>FSA’s approach should be informed by an understanding of what terms like ‘honesty’ and ‘proportionate’ mean for FSA and for its different stakeholders and audiences. Where third party communicators (e.g. media) reflect risk communication messages accurately and proportionately</p>	<p>The direction in this principle was endorsed by the WG, who are particularly keen to emphasise the need for communication strategy and tactics to be led by robust audience insight and evaluated according to outcomes.</p> <p>The WG suggests that other psychometric factors might outweigh experience/expertise, for example attitudes to risk, and/or levels of investment in the issue, when it comes to segmenting and defining audiences.</p> <p>5. The WG was interested to hear about the OASIS model of communication planning and recommends that this might be an appropriate model to follow.</p> <p>6. The WG was interested to hear about the work done on transparency (2017) and trust (2018) and recommends that the FSA review these in establishing its definition of ‘honesty’.</p> <p>7. The WG discussed ‘proportionate’ at length, that what is deemed proportionate be defined differently by various stakeholders and interests, and recommends that the</p>

	<p>this is a positive outcome, but third party communications are influenced by a number of factors that are not under the control of the risk communicator.</p>	<p>FSA should endeavour to balance these in favour of the greatest societal benefit and positive impact on public health. The evidence provided to risk managers should include advice in support of these decisions, which should be documented and transparent.</p> <p>The WG endorses the final point in the commentary and agrees that while the reaction in the media is impossible to control, action can be taken to control inaccuracy and the evidence base should be made publicly available.</p>
<p>13. Risk communication should itself be evidence-based. This covers evidence informing the selection of the approach to communication and evidence on the success of the communication.</p>	<p>Communication professionals should be involved from the earliest opportunity.</p> <p>Changing behaviour through communication alone is not easy and where communication does affect behaviour this is often difficult to demonstrate clearly. However, FSA should be explicit in its objectives for communication and how it will assess their success.</p> <p>The selection of the approach to communication should be informed by evidence and expert advice on:</p> <ul style="list-style-type: none"> • the choice of mode of risk communication; • who the target audiences are; • how best to characterise uncertainty; • how people, businesses and others understand and accept risk and uncertainty and how this affects their decision-making. <p>Evidence on the success of a communication includes whether the target audiences have been reached and evidence of any behavioural changes that have resulted.</p>	<p>The WG endorses the principle and emphasises that joint working between social science and communications is crucial to ensure that work is a) evidence based and b) effectively evaluated against outcomes.</p> <p>The WG would like to note that the desired outcome of risk communication is not always behaviour change</p> <p>8. The WG recommends implementing the OASIS principles as a way of operationalising this into communications practice.</p>
<p>14. The communication of risk to interested parties should include transparent explanations of:</p>	<p>The way that uncertainty is to be addressed in communication of risk should be considered from the outset.</p>	<p>9. The WG recommends that this be combined with Principle 7.</p>

<p>i) any uncertainties in the risk assessment; and ii) the way that uncertainties were dealt with in the decision-making process.</p>	<p>Where there are significant uncertainties in the risk assessment one aim of risk communication is to help people understand the range of possible outcomes and the balance of short-term and longer-term risks and opportunities.</p>	
<p>15. Risk communication should always contribute to the FSA's goal of being the primary source of trusted information about food risk.</p>	<p>Risk communication should have the effect of increasing trust in the FSA by the target audience and more broadly, and should enhance the FSA's ability to communicate risk in the future. The possibility of unintended, negative consequences should be considered and mitigated throughout.</p>	<p>The WG questions whether it is the FSA's goal (or indeed feasible) to be the primary source of trusted information about food risk.</p> <p>10. Instead, the WG recommends that the FSA should aim to maintain and build its trustworthiness in its assessment, management and communication of food risk, and welcomes the efforts already made to understand the drivers of trustworthiness.</p>

ACSS Risk Communications Working Group 2 – Risk Communications

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