

# Food policy coherence in local government: who does what and why?

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## Abstract

**Background:** In the UK, food policy is often made by national government, but typically interpreted and implemented by councils. This research explores which local government functions are involved in food policy, how they work together and how coherent their policy positions are. It builds on earlier work to map the food policy actors at national government level and to understand local government's many functions.

**Methods:** I conducted a literature review using search terms including 'local authority', 'local government', 'food' and 'food policy' across two academic databases: Scopus and Web of Science, plus results from *Food Policy* on Science Direct. The total number of papers identified and analysed was 99. I then conducted 30 semi-structured interviews with employees of local authorities and representative bodies covering the various functions of local government. I analysed the interviews using NVivo to highlight the themes, which included priority food policy issues for councils; local government functions and how they relate to each other; external stakeholders; and success factors.

**Findings:** Despite the high degree of complexity, fragmentation and granularity in local government, there appears to be a high degree of food policy coherence within and between individual councils. However, there is policy incoherence between central and local government, where a lack of national strategy and piecemeal approach to devolution have hindered councils' efforts to improve the food system. Some functions of councils are particularly 'joined up', with good multi-function and multi-agency working arrangements in public health, trading standards, environmental health, economic development, planning and sustainability. Other functions, notably adult social care, markets and emergency planning, have been harder to engage, and interview responses suggest food policy is not a priority for these functions.

**Conclusions:** For food policy interventions in local government to be successful, they need to be accompanied by adequate long-term funding; a coalition of support; and to be seen as a priority by relevant stakeholders. Partnership arrangements provide good opportunities to make use of existing networks. Councils could do more to increase joint working between neighbouring organisations.

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## List of Abbreviations

ACS	Association of Convenience Stores
CED	Climate Emergency Declaration
CLES	Centre for Local Economic Strategies
CMA	Competition and Markets Authority
CTSI	Chartered Trading Standards Institute
DHSC	Department of Health and Social Care
DLUHC	Department of Levelling Up, Housing and Communities
DWI	Drinking Water Inspectorate
DWP	Department for Work and Pensions
FSA	Food Standards Agency
GDPR	General Data Protection Regulations
HFSS	High in Fat, Sugar and Salt
IfG	Institute for Government
LGA	Local Government Association
NFS	National Food Strategy
NGO	Non-Governmental Organisation
NHS	National Health Service
NPD	New Product Development
NTS	National Trading Standards
OECD	Organisation for Economic Co-operation and Development
SDG	Sustainable Development Goals
SFP	Sustainable Food Places
TPIHC	Transformation Partnerships in Healthcare
WLGA	Welsh Local Government Association
WRAP	Waste and Resources Action Programme



# Introduction

## Definitions and terminology

Councils are public sector organisations that deliver a wide range of services to people near to where they live. They are made up of elected politicians (councillors) who decide how their council should best meet the needs of its residents, within a framework of statutory powers and responsibilities (LGA, 2023e). The terms ‘local government’ (collective), ‘local authority’ (individual) and ‘council’ (colloquial) are used interchangeably throughout this document, just as they are in practice.

## Aim

The goal of this dissertation is to explore how food policy gets put into practice by local authorities in the UK. While food policy is often *made* at the central government level, by ministers and departments representing the national interest (Parsons, Sharpe and Hawkes, 2020), it is often *interpreted* and *implemented* by councils (Parsons, 2019; Parsons, Sharpe and Hawkes, 2020).

This dissertation builds on work by Parsons (2021) to map the food policymaking environment at the national government level in England. Parsons identified 16 central government departments with collective responsibility for food policy, helping practitioners to understand the complexity of, and conflict within, the food policy environment (Parsons, Sharpe and Hawkes, 2020; Parsons, 2021). This is shown at Figure 1, below.



Figure 1: National government responsibilities for food policy-making in England; Parsons, K., Sharpe, R. and Hawkes, C. (2020)

## Background – UK local government

Local government in the UK is a complex patchwork of powers and responsibilities (NAO, 2017; ONS Geography, 2022). The boundaries and classifications are shown at Figure 2, below.

In some parts of England, there are two *tiers* of local government, known as *counties* and *districts*. Counties are made up of multiple districts; powers are split between the county and the district councils within it (NAO, 2017). As shown in Figure 2, Cornwall, for example, is a unitary authority, with all council functions being delivered by a single organisation in the county (Cornwall Council, 2023). In neighbouring Devon, which is a two-tier authority, there is one county council, eight ‘lower tier’ district councils, and two unitary authorities (Devon County Council, 2023). Anyone wishing to effect food policy change in Devon may therefore need to deal with 11 distinct organisations, all of which may have different political affiliations, priorities and funding (ONS Geography, 2022).

The responsibilities of different tiers of councils are somewhat arbitrary and a product of evolution over decades (NAO, 2017). For example, county councils are responsible for waste *disposal* and trading standards functions, whereas district councils are responsible for waste *collection* and environmental health (gov.uk, 2023d). As I found in my research, these distinctions are both ambiguous and important: for example, food *standards* (e.g. labelling, as part of trading standards) is enforced at the county level, whereas food *hygiene* (e.g. allergen compliance, as part of environmental health) is enforced at the district level.

In those parts of England without this two-tier structure, only a single tier exists, in which one council is responsible for all functions (gov.uk, 2023d). These councils have different classifications (32 *boroughs*, in London, and 36 *metropolitan districts* and 62 *unitary authorities* in the rest of England (ONS Geography, 2022). For example, Wiltshire is a unitary authority, meaning it is a single-tier county council that is not subdivided into districts (ONS Geography, 2022; gov.uk, 2023a; LGA, 2023e). Councils can also form organisations to represent them collectively (such as the Local Government Association (LGA)), jointly deliver services (e.g. London Councils) or to achieve economies of scale (Combined Authorities, which typically operate across a region, like Greater Manchester, and often have an elected mayor) (gov.uk, 2023a).

# UK: Local authority districts, counties and unitary authorities,<sup>1</sup> 2022

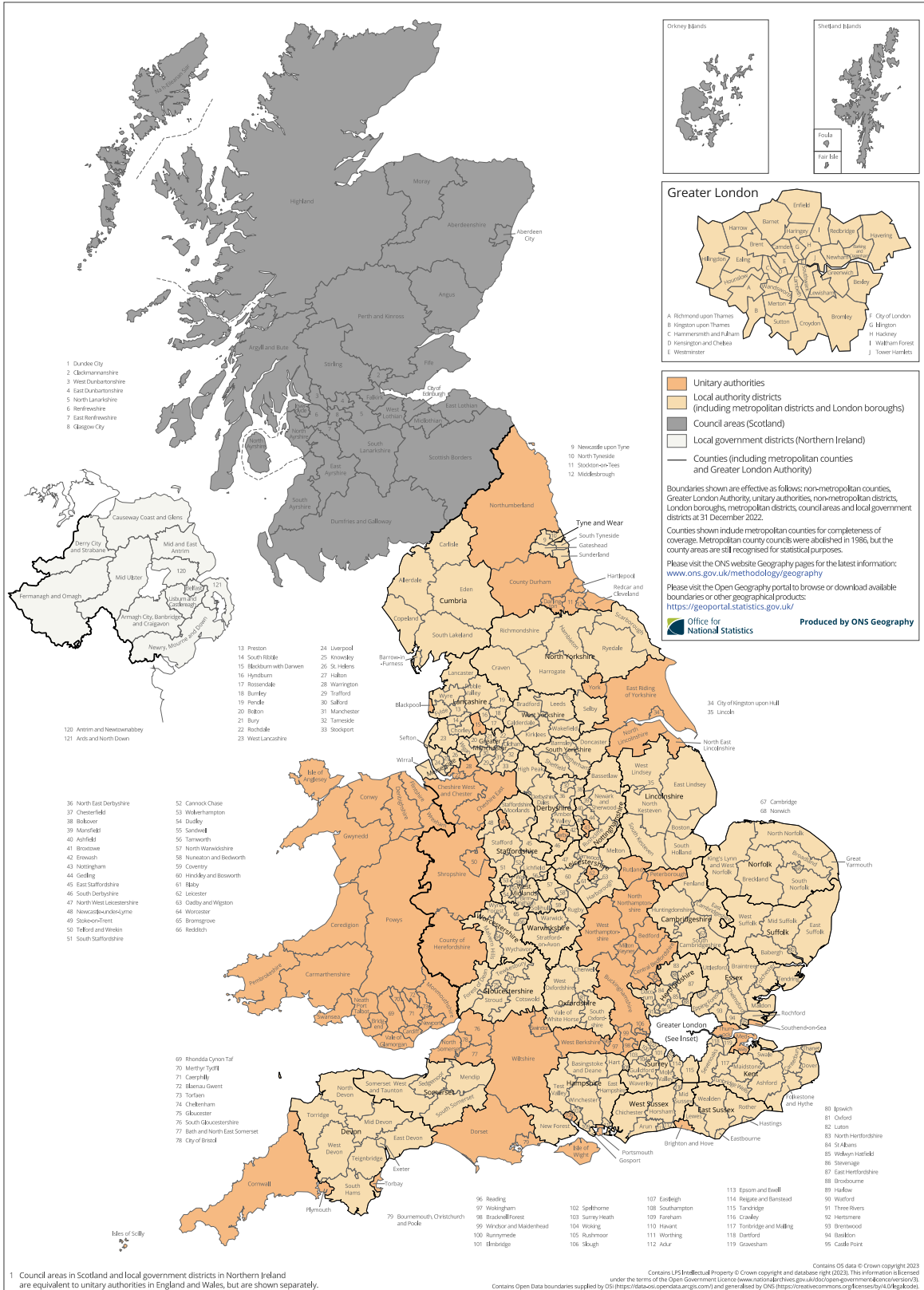


Figure 2: Local authority districts, counties and unitary authorities © Crown copyright 2023

## Devolved administrations

The UK is made up of four nations: England, Wales, Scotland and Northern Ireland, with the latter three often described as the ‘devolved nations’. The nations have discrete powers devolved to them by the UK Government in Westminster (Torrance, 2022). The powers vary from one devolved nation to the next: for example, local authorities in England are responsible for public health, but this remains a function of the healthcare authority in other parts of the UK. In Northern Ireland, some functions delivered by councils in England, Wales and Scotland (notably education, social care and libraries) are delivered by the Northern Irish national government (Paun, Wilson and Hall, 2019; Torrance, 2022).

Devolution also affects the agencies that work with local authorities, for example, the Food Standards Agency (FSA). The FSA works in England, Wales and Northern Ireland, but with different responsibilities in each. Food Standards Scotland is independent of the FSA but must work closely with it in the interests of coherent policymaking (FSA, 2023b). This complexity is set out at Figure 3, below. Similar complexity exists across many government departments and agencies (NAO, 2017).

	England	Wales	Northern Ireland	Scotland
Food safety and hygiene				 <b>Inbhe Bidh Alba</b>
Animal feed safety, hygiene and labelling				
Food labelling (safety, allergy)				
Nutrition standards				
Nutrition food labelling				
Other food labelling, food composition standards, country of origin				

Figure 3: FSA's devolved responsibilities

The structure of local government also varies between the devolved nations; England has a mixture of two-tier (county and district) and single-tier (unitary) councils (ONS Geography, 2022). Scottish, Welsh and Northern Irish local authorities are all single-tier authorities (gov.scot, 2023b; gov.uk, 2023a; NIDirect, 2023; WLGA, 2023). This makes navigating the policymaking environment considerably easier, not least because stakeholders outside local authorities (such as healthcare providers) are often organised in such a way that their boundaries align with council boundaries (gov.scot, 2023a; Rookes, 2023). My interviewees included people based in, and familiar with, all four nations of the UK. While it was not a representative sample, I am confident that I have a wide enough range of views to draw reasonable conclusions. The number of interviewees explicitly mentioning each of the devolved nations is shown at Appendix 8.



## Organisation structures

Each council is a distinct organisation; *what it does* is largely prescribed in legislation, but *how it does it* is up to the council to determine (NAO, 2017). As a result, councils tend not to adopt a universal structure or naming convention for their departments (though of course some consistencies exist). It is therefore easier to consider local government *functions* as a corollary to central government *departments*. Happily, the Institute for Government (IfG) has completed a recent mapping exercise (at Figure 4, below) to understand what functions councils are responsible for and at what level (Paun, Wilson and Hall, 2019). I used this mapping as the principal way to categorise local authority interfaces with food policy. The list of functions is reproduced at Appendix 1.

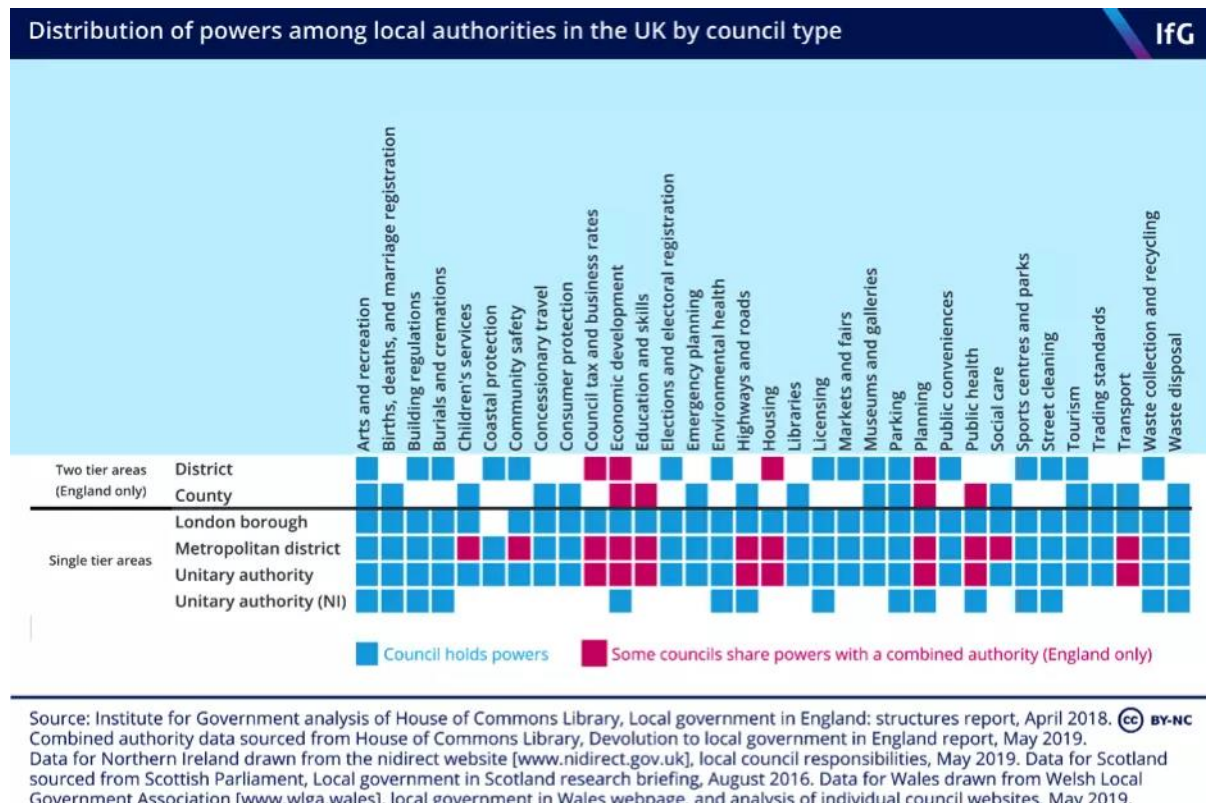


Figure 4: Local government functions in the UK © Institute for Government 2019

## Positionality statement

A positionality statement is an acknowledgement by an author that their research is undertaken in the context of their privilege, intersectionality, bias and worldview and that it cannot be considered truly free of bias (Brown, 2022). I started my career working in two local government representative bodies: the LGA, which represents every council in England; and London Councils, which represents the 32 London Boroughs and the City of London. These roles gave me a useful insight into the workings of local government.

While I enjoyed these positions, they have certainly left me feeling that local government in the UK is more complex, and the process of making policy at the local level more opaque, than it needs to be. I have written previously on the disproportionate number of elected members in some parts of the country (Kidd, 2014), and acknowledge my frustration that the system prioritises granular decision-making over the efficient delivery of public services. As a newcomer to the world of local

government, I found it to be complex, inconsistent and hard to navigate. This is shown in part by the sheer number of representative bodies (NAO, 2017), some of which are in Appendix 1.

I believe there is an opportunity for more consistency within and between councils. I began the research expecting to find complexity, duplication and inefficiency. To address this, I deliberately sought areas of good practice and success stories of councils doing good work. However, I must recognise that things are as complex as I had even imagined (and in some cases, more so). Much of the good practice I identified represents the exception, rather than the rule.

I must also acknowledge the privileged access my experience and background has given me to contact senior stakeholders in UK local government for the purposes of this research. Knowing whom to ask (and in some cases benefiting from an introduction from my existing network) has undoubtedly made this research easier and faster.

### Expected outcomes and benefits

As a newcomer to policy roles in local government (unrelated to food and 18 years ago), it took me a long time to understand the wide range of stakeholders and positions on policy issues I thought would be straightforward. Now, returning to policy but looking instead at food, I have needed to unpick a complex web of actors and positions. Parsons (Parsons, 2021) helped food policy researchers and practitioners to understand the complexity of *central* government departments with an interest in food.

My goal for this research is to give policy practitioners a similar way to navigate the complexity of *local* government. In doing so, I hope they will be able to design better, more coherent policies, that have a greater chance of success, by acknowledging and accounting for the complex policymaking environment inherent in local authorities. At the local scale, I hope this research may help to effect the changes in local food systems that are increasingly being called for (Dimbleby, 2021; Parsons, 2021; Zerbian *et al.*, 2022).

## Literature Review

### Scope

Local authorities have an important role in licensing of premises that sell alcohol (gov.uk, 2021). To keep this research manageable, I chose to exclude the sale and consumption of alcohol from scope. Indeed, alcohol alone could form the basis of a dissertation and is already the subject of extensive research (Muka *et al.*, 2022). I also did not explore ‘food-adjacent’ topics such as fluoridation of drinking water; historically, this was a function of local government, though it is now a function of the Department of Health and Social Care in England and its counterparts in the devolved administrations (DWI, 2023).

### Review methodology

To begin my research, I conducted a literature review. My goal for the review was to identify which local government functions have a role in making and/or implementing food policy. I began my search using four scientific databases: EBSCOhost, Scopus, Web of Science and Science Direct. I tried a combination of search terms including ‘local authority’, ‘local government’, ‘food’ and ‘food policy’. The term ‘council’ has many meanings aside from local government, so I opted not to use it. Where possible, I limited search results to the United Kingdom or countries, regions and towns within it. I settled on Scopus (which includes the *British Food Journal*), and Web of Science, because they had the highest number of unique and relevant results, plus results from *Food Policy* on Science Direct. I conducted the search in April 2023 and did not specify a time limit for results. After removing obviously erroneous results and duplicates, I was left with 99 research papers.

### Review findings

I used the IfG list of local government functions to tag each of the papers in Mendeley Reference Manager. A summary of the frequency of each local government function is shown at Appendix 1. A systems diagram showing the most frequently mentioned functions (reflected in the size of the circles) and the main links between them is shown at Figure 5, below. Each function is shown in **bold** on first use for ease of reference.

By far the most common local authority function referenced in the literature is **public health** (n=53). A prominent theme (16 papers) was the role of councils in addressing obesity by using local powers, like using **planning** to restrict unhealthy food outlets (Caraher, Lloyd and Madelin, 2014; Caraher *et al.*, 2016; Brown *et al.*, 2021, 2022), **trading standards** (in enforcing sales restrictions of foods high in fat, sugar and salt (HFSS)) (Harrison, Flynn and Marsden, 1997; Patel *et al.*, 2018; Muir *et al.*, 2023), or even in its role as a **transport operator** by restricting junk food advertising (Croker *et al.*, 2020). The role of ‘regulatory services’ (**trading standards, environmental health, consumer protection**, all three of which are often conflated) in protecting the public from food adulteration, food poisoning and food fraud was also a popular subject for study (e.g. Wilkin *et al.*, 2006; McElwee, Smith and Lever, 2017; Manning and Soon, 2018, 2019).

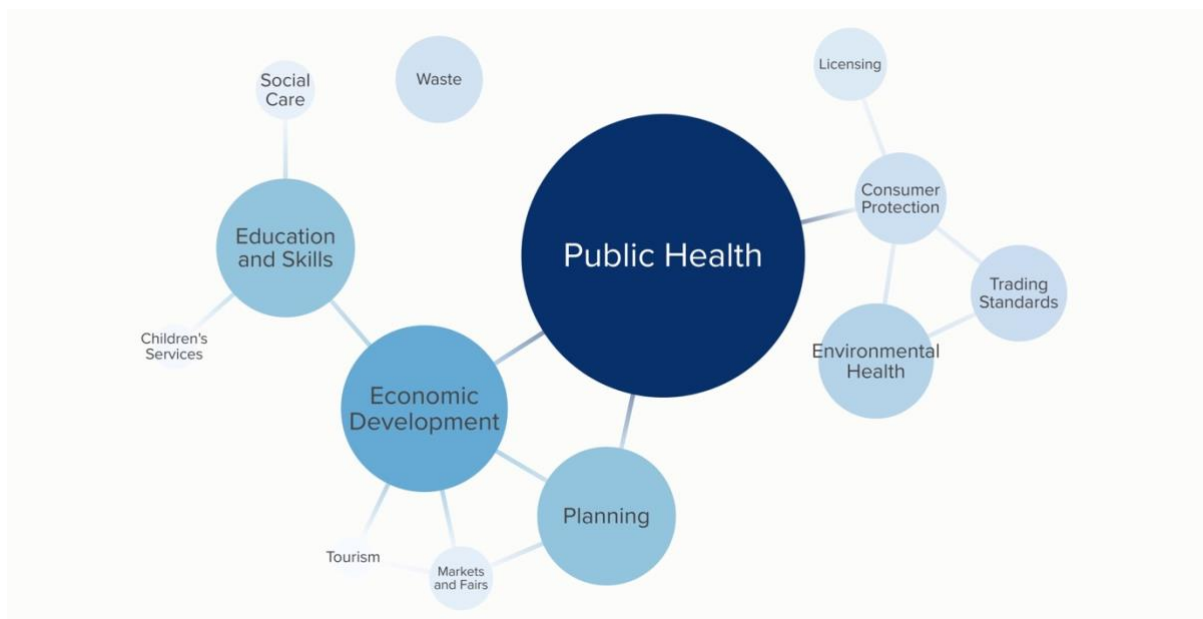


Figure 5: A simplified systems diagram of local government functions most frequently mentioned in the literature review; frequency of mentions corresponds to circle size, and connections reflect links made between functions in the literature

These public health and/or regulatory services functions were also the most common sources of policy incoherence and divergence. As noted by several researchers, there can be a conflict between councils' **economic development** functions (by encouraging businesses to open and prosper) and the need to limit the sales and/or growth of businesses selling unhealthy foods to tackle obesity (e.g. Hanratty *et al.*, 2012; Bagwell, 2014; Zerbian *et al.*, 2022). A similar constraint on economic growth is noted in relation to food safety and **environmental health** inspections (Wilkin *et al.*, 2006; Bradford-Knox, 2017; Babatola, 2023). Four researchers note the impact on food insecurity caused by austerity measures or other cuts to local authority services (Dowler and Lambie-Mumford, 2015; Loopstra *et al.*, 2018; Jones, Thomas Lane and Prosser, 2022).

The role of local authorities as providers of food, particularly in institutional settings, was another common theme. 22 studies related to councils' **education** function, most of which focused on improving the standards of school food ((e.g. Nelson, 2013; Aliyar, Gelli and Hamdani, 2015; Lalli, 2021; McIntyre *et al.*, 2022). Eight related to the provision of free school meals (e.g. Chambers *et al.*, 2020; Spence *et al.*, 2021; Jessiman *et al.*, 2023). Three studies, relating to education, noted the potential for well-fed students to be more successful or productive, reducing inequalities and contributing to **economic development** (a rare opportunity for policy coherence identified in this literature review) (Nelson, 2013; Chambers, Dundas and Torsney, 2016; Defeyter *et al.*, 2022). Just two of the studies relating to education covered the role of schools (many of which are run by councils) in teaching children about food. This lack of research perhaps reflects the low priority given by Government to food education in schools, a gap that is currently the focus of several charities (School Food Matters, 2023; Sustain, 2023; TastEd, 2023).

Only six studies looked at councils' role as providers of **social care**, including **children's services**, with two looking at nutrition in vulnerable elderly people (Herne, 1994; Merrell *et al.*, 2012). This paucity



of research in social care is perhaps surprising given a large and growing proportion of councils' expenditure goes on social services (DLUHC, 2022).

Another important function with widespread coverage by researchers is that of **waste collection, recycling and disposal**: food waste was the subject of 11 studies (e.g. Aramyan *et al.*, 2015; Waite, Cox and Tudor, 2015; Allison *et al.*, 2022). Unlike the other functions identified above, waste management appears largely isolated from other council responsibilities.

Six studies conducted research into **markets**, noting the potential for councils to boost **tourism** by promoting markets and food festivals (Hall and Sharples, 2008), alongside more prosaic council functions of **planning** (where markets should be) (Smith and Sparks, 2001; Jones, Comfort and Hillier, 2003, 2004) and **consumer protection** (monitoring trading practices of stallholders) (Jones, Comfort and Hillier, 2004; Caraher *et al.*, 2010; Zerbian *et al.*, 2022). Other local government functions had more tangential food policy links. One study described the need to engage with **arts and recreation** (through cultural and community centres) to deliver health promotion activities (including nutrition advice) (Wiggins *et al.*, 2004). Lang (2019) noted the importance (and absence) of food policy in councils' **emergency planning**, in the context of Brexit-induced food shortages.

### The data gap – policy coherence

Policy coherence means how well (or otherwise) two or more policies are aligned with each other (Hawkes and Parsons, 2019). At a minimum, they should be complementary and, ideally, mutually reinforcing. The purpose of achieving policy coherence is to give policy interventions the greatest chances of success by proactively considering enabling factors, barriers and risks. Drafting policies in isolation, without considering their context and interaction, can result in conflict arising between them. This is known as *policy incoherence* and can undermine efforts to improve systems through policy interventions (Hawkes and Parsons, 2019).

The *goal* of policy coherence (which can be more simply thought of as 'joined-up thinking' by policymakers) is not new. However, the *concept* of policy coherence, and ideas about how to analyse and improve it, are more nascent. Policy coherence originated in the field of international development, where supranational organisations like the OECD, EU and UN started to address it around 20 years ago and have steadily added it to their policymaking processes and legislative frameworks (Brooks, 2014; Hawkes, 2017; OECD, 2017, 2019, 2021; Hawkes and Parsons, 2019). Since 2015, the importance of policy coherence, and the ways in which it can be addressed, have been the subject of much more study. At the same time, it has started to percolate down among national governments and NGOs and beyond the traditional confines of the development sector to be a much more recognisable, and valued, concept (Mackie, Ronceray and Spierings, 2017; Hawkes and Parsons, 2019; OECD, 2019; Righettini and Lizzi, 2022).

The literature review shows that many functions of local government have an impact on, or are impacted by, food policy. I was surprised my search yielded only 99 research articles given there are more than 400 councils across the UK, collectively delivering more than 30 distinct functions and services (NAO, 2017; ONS Geography, 2022). Much of this research was focused specifically on a single function, with little consideration given to how functions and services work together (if indeed they do). The literature shows a few 'focus' areas, like public health, planning, regulatory services and economic development, though this does not feel like a complete picture. Some local government functions (births, marriages and deaths, burials and cremations, public toilets) seem

unlikely to have a significant overlap with food policy. However, there are probably others where more work is needed to understand the links and opportunities for (in)coherence. Absence of evidence is not evidence of absence. I therefore believe a gap exists in understanding the full extent of food policy interests across local government functions.

Given how infrequently food policy coherence came up in the literature review results, I conducted an additional literature review into non-food policy coherence in local government. I began my search using the same four scientific databases: EBSCOhost, Scopus, Web of Science and Science Direct. I used the search string “local authority” OR “local government” AND “policy coherence” and limited the search to peer-reviewed journals. This search yielded several hundred results across the four databases. Given the specificity of how UK local government is structured, I tried limiting results to just the UK (or regions within it). This yielded no relevant results. On scanning through titles and abstracts of the global results, and sampling several papers, it became clear that the search had not yielded any relevant results. This was perhaps unsurprising: the concept of policy coherence has only been in existence for around 20 years and has only been studied in earnest since 2015 (Hawkes, 2018; Hawkes and Parsons, 2019). I also conducted a review of grey literature, searching Google using a similar string (adapted through trial and error to refine the results). Even at the greatest specificity I could use, I found tens of thousands of results which still did not look relevant. Among the highest-ranking results were several reports, documents etc that typically noted a particular example of policy incoherence (e.g. House of Commons, 2008), explained what policy coherence is and why it matters (e.g. Martínez, 2015) or referenced other documents that do so (e.g. OECD, 2023). As far as I can tell, no-one has conducted a policy coherence analysis focused specifically on local government.

## Methodology

### Research questions

My primary research question is:

- How is food policy made, interpreted, and implemented in local authorities in the UK?

My secondary research questions are:

- What can policymakers do to increase the success of proposed interventions delivered by local authorities?
- What are the main areas of food policy incoherence in UK local authorities and how can they be resolved?

The audience for this research is anyone who wants to effect change in food policy at the local level, which could include:

- Policymakers at the national government level
- Policymakers at the local level (working within local authorities and related organisations)
- Campaigning and advocacy organisations
- Academics

### Research methods

The main research method I used was qualitative, semi-structured interviews with representatives of the local government functions identified, and/or with those bodies that frequently interact with them. Examples of these functions and organisations are set out in Appendix 1. This research approach has been used effectively with local authority employees (including policy specialists) by other researchers (Ranasinghe, 2014; Georgiou and Makri, 2015; Homer *et al.*, 2022) so I was confident that this would yield a good breadth and depth of responses.

Based on my experience in local government (see *Positionality Statement*), I am aware of many representative bodies, panels and other thematic forums for each of the local authority functions listed by the IfG (NAO, 2017). Some council functions are represented by a dedicated national organisation (NAO, 2017). Examples include the Chief Cultural and Leisure Officers Association (CLOA, 2023) and the Association of Directors of Adult Social Care (ADASS, 2023). Some functions do not have a distinct co-ordinating body, but have support provided by the LGA, such as the Special Interest Group on Coastal Protection (LGA Coastal SIG, 2023). Some functions have at least one national organisation with a strong interest in that function and which could speak to its local government policy context (like the British Toilet Association (BTA, 2023), Confederation of Passenger Transport (CPT, 2023) etc.

To begin my research, I conducted a Google search to identify representative bodies for each of the council functions described by the IfG. I used a combination of search terms such as 'local authority' + [function name] + 'representative body' to identify as many organisations as I could (set out at Appendix 1). I then emailed each of these organisations to ask whether their members had any connection to, or interest in, food policy (an email template is at Appendix 6). Four responses were positive and led to interviews while 18 said that food policy was not of interest to that function.

Using LinkedIn, I consulted my professional network, which included people who work at some of the organisations I identified, as well as people who were able to make introductions. LinkedIn allows researchers to leverage existing connections, perform a granular search based on location, job title and subject matter expertise, share very specific requests for information, and pre-screen prospective interviewees to validate the likelihood that they can speak to a specific topic (Robinson, 2020). A particular advantage of LinkedIn, and one I experienced, is earlier interviewees suggesting and/or introducing subsequent interviewees' expertise, known as 'snowballing' (Robinson, 2020; Beerli, 2023). Not every potential interviewee will have a LinkedIn profile of course (Beerli, 2023) so I also contacted the organisations I was aware of directly, via the contact details on their websites.

### Interview approach

I undertook *semi-structured* interviews, which are useful for "eliciting data grounded in the experience of the participant" (Galletta and Cross, 2013, p. 45) with a combination of consistent introductory questions (describe your role, how does your specialism interact with food policy, etc), before allowing the conversation to evolve based on the initial responses (Galletta and Cross, 2013). As such, the interviews were largely *non-directive*, albeit within the confines of food policy, because I was unlikely to know in what direction the discussion would go beforehand. I conducted desk research beforehand (such as by reviewing any policy documents the interviewee's organisation had published) to keep the interviews reasonably *focused*, and to prompt or guide the conversation where needed (Gray, 2022). I was also sent documents, links to further information or suggestions for additional lines of enquiry by most interviewees. I used these documents to validate what the interviewees had told me and to identify examples and case studies. I have referenced these documents, where relevant, in the *Results* section.

I chose interviews as the research method for this study (compared with, say, questionnaires) as they better allow for the exploratory nature of the topic, because of their "flexible and fluid structure" (Priyadarshini, 2020, p. 4). It would not be realistic to construct a questionnaire asking about policy links (which may be tangential, or unconsidered before being asked), nor would it allow the freedom to give prompts or to ask probing questions. Using interviews gave me an opportunity to develop questions 'on the fly' based on initial responses given by the interviewee. From experience, asking subject matter experts to share their knowledge and/or reflect on their professional experience can often be an enjoyable, validating and even cathartic experience, and one which I hoped would elicit more considered, candid responses than would a questionnaire or similar method (Galletta and Cross, 2013; Priyadarshini, 2020; Gray, 2022).

I conducted the interviews online, using Microsoft Teams, (St George's UoL, 2023). This allowed me to make the best use of my time and that of my interviewees by eliminating travel and is a secure, GDPR-compliant means of communicating (Microsoft, 2023a). Online interviews also enabled me to record and transcribe each one more easily (Microsoft, 2023b). A template of the questions I asked is at Appendix 7. I asked interviewees about the food policy issues that their specialism covered and the role played by local authorities in developing, interpreting, responding to and implementing food policy interventions. I aimed to triangulate respondents' assertions with each other and/or to seek published evidence to back up their claims. However, the relatively small sample size, reliance on personal experiences and potential for bias in how I chose to direct the interview are all limitations of this approach that cannot be fully controlled for (Galletta and Cross, 2013).

## Understanding the data

Having transcribed the interviews, I coded them using NVivo, “a qualitative data analysis package for use by qualitative researchers working with text-based and/or multi-media information” (City UoL, 2023b). I used the IfG list of local government functions (Paun, Wilson and Hall, 2019) as a starting point but also developed my coding taxonomy iteratively, based on interviewees’ responses, in the manner described by Galletta and Cross: “potential codes and clusters of key codes frequently begin to emerge as the research moves along through regular revisiting of interview data... Some codes are discarded as you move along in the research. Others will take shape, further refined by the frequent looping back between analysis and data collection in an iterative process” (2013, pp. 108–9). For example, success factors, non-council stakeholders and cross-cutting policy issues emerged throughout the interviews, which I used to further code and analyse the data.

## Policy coherence analysis

There is no single, agreed approach to analysing policy coherence, but it can include reviewing policy documents and other literature, statistical modelling, interviews and workshops (Hawkes and Parsons, 2019). For my analysis, I had initially intended to use the popular framework developed by Nilsson, Griggs and Visbeck (2016) for evaluating the UN Sustainable Development Goals (SDGs). They propose a seven-point scale for considering the influence of one goal or target on another.

When considering the various policy issues that came up in my interviews through the lens of this seven-point scale, I found it helpful to an extent, but it did not help to explain *why* there was policy incoherence. Instead, I turned to work produced by Hawkes and Parsons (2019) which built on earlier work by the OECD (Morales and Lindberg, 2017). This framework proposes four dimensions of policy coherence. I found this a much more helpful way to understand and rationalise the various elements of policy incoherence in local government. The framework is summarised in Table 1, below. I used this framework to explore food policy (in)coherence in local government as described by my interviewees (see the *Analysis* section for the findings).

Table 1: *Four dimensions of policy coherence* (based on Hawkes and Parsons, 2019)

Dimension	Description
<b>Horizontal</b>	Policies that exist at the same level of policymaking authority
<b>Vertical</b>	Policies that exist at different levels of policymaking authority
<b>Geographic</b>	Policies that apply to different places at the same time, or that are made in one place but impact other places
<b>Temporal</b>	Policies with different time horizons (now vs future; short-term vs long-term)

## Research ethics and governance

Research ethics relates to the moral framework in which research is conducted, and involves taking steps to conduct research responsibly, properly and fairly (Gray, 2022). There is an ethical consideration for this research as it involves human participants. Interviewees participated purely in a professional capacity, commenting mainly on facts, rather than feelings. As such, and because they are not from vulnerable groups (such as children or adults at risk), the research was deemed to be low risk, from an ethical perspective. However, it was possible that the discussion would uncover tensions and conflicts between functions or organisations, potentially revealing some inflammatory or critical views. My goal was to limit harm to the individual participants, which I achieved by anonymising their responses and attributing them only to a function or type of organisation. I was also clear upfront about the goals of the research and how participants' responses would be used to obtain their informed consent to participate (Lancaster, 2017; City UoL, 2023a). My Ethics Application Form is at Appendix 2, the Participant Information Sheet is at Appendix 3, the Recruitment Flyer is at Appendix 4, and the Consent Form Template is at Appendix 5.

## Results

### Introduction

I interviewed 30 people who work in and/or with local authorities in the development, interpretation, and implementation of food policy. Nine interviewees were working in councils alongside roles in representative organisations. Although this sometimes made the interview complicated, I believe it was beneficial to the research because individuals were often able to share a range of perspectives, including from the national and local levels. Throughout this section, any unqualified assertions are based on views from interviewees, backed up with representative quotes, unless otherwise stated and cited.

### Functions of local government

The first 'lens' through which I considered the interview findings is that of the **functions** of local government. When I began the search for interviewees, I contacted the representative bodies for all the functions on the list – around 50 in total, listed at Appendix 1. My email template is at Appendix 6. I received responses from 22 organisations, of which 18 said they had no interest in food policy, of which four qualified that by saying '...but maybe we should'. Three respondents noted some work they had done in isolation or that was not part of their core brief. I expected that some of the organisations I contacted would have no interest in food policy (coastal protection, public toilets, street cleaning). However, some of those sending negative responses surprised me. A representative of adult social services providers advised that they 'don't have any links with food policy at all,' despite their function being responsible for feeding millions of vulnerable adults (even if via third-party providers).

Other responses were more encouraging (and no less surprising). A representative of crematorium operators noted that, despite not being involved in food policy, given some of their members operate cafes which employ council staff and sell food procured by the council, maybe they *should* be exploring food policy more. Four functional representatives confirmed that they did have an interest in food policy and put forward a colleague to speak on behalf of that function. The count of results (shown in Appendix 7) may therefore be somewhat biased toward the functions who consented to participate. However, it is still useful in understanding the main local government functions involved in food policy (note that adult social care was mentioned by eight participants, for example, despite not being represented among the interviewees). A simplified system diagram showing the most common local government functions with an interest in food policy and the main links between them, is shown at Figure 6, below. The size of the circle corresponds to the frequency with which that function was mentioned, and the connections between circles correspond to relationships between those functions described by more than one interviewee.

**Public health** was the most mentioned function (23). Six interviewees worked in a public health-related role, but most interviewees noted the importance of and links with public health for their function. This frequency echoes the findings of the literature review: public health is among the most researched topics in local government food policy. Five interviewees noted that the public health function, which was only moved into English councils in 2010, still has a ring-fenced budget. This means they still have capacity and resources to undertake proactive public health interventions, typically in tackling obesity (alongside cutting smoking and encouraging exercise). Two interviewees

noted that this ringfencing has lasted an unexpectedly long time; most other local government functions are funded from the same core budget, meaning adult social care is increasingly drawing funds away from less immediate concerns.

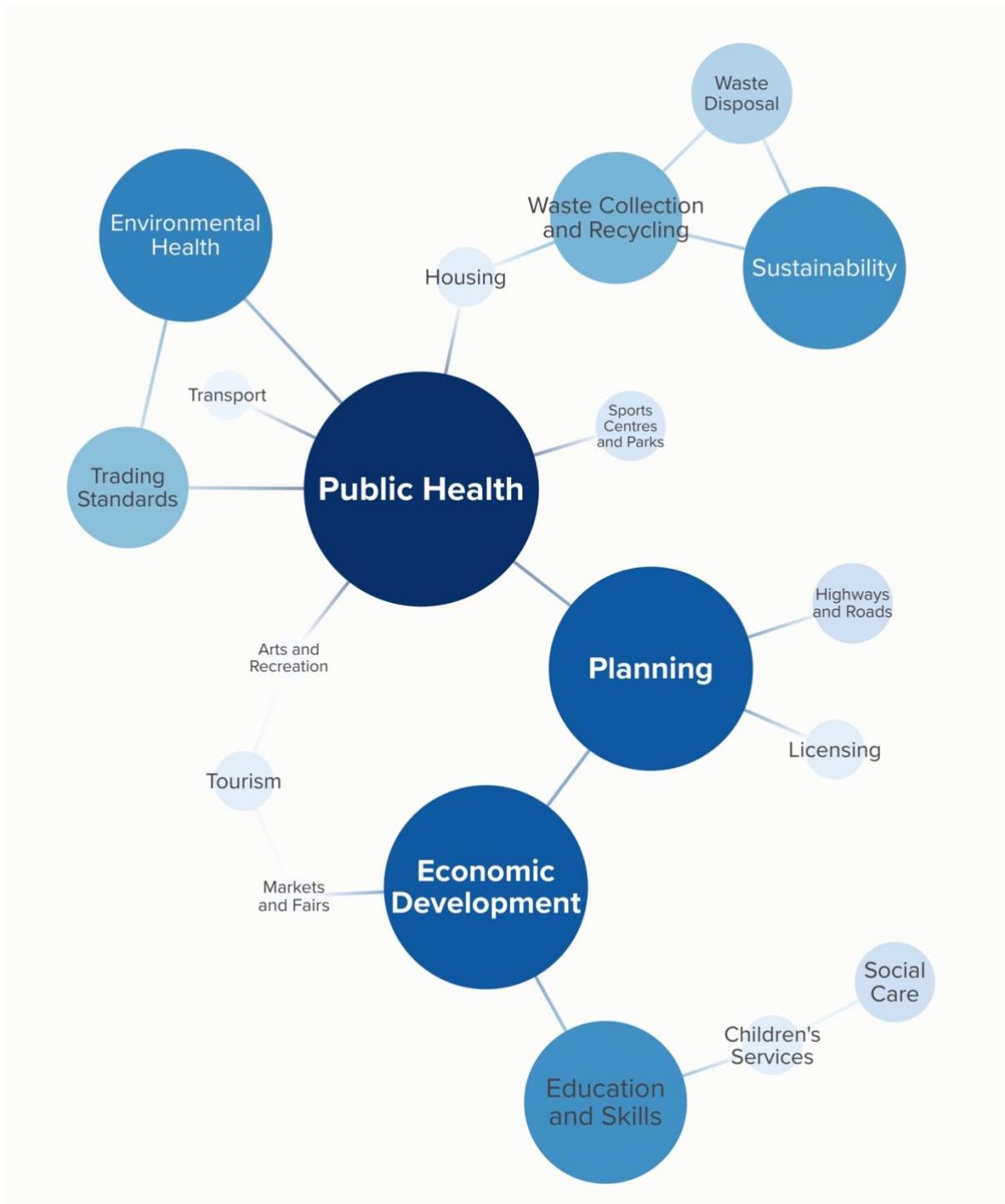


Figure 6: Simplified system diagram showing the main functions with an interest in food policy and links between them; circle size corresponds to number of interviewees mentioning that function; connections denote relationships between functions mentioned by more than one interviewee



The public health budget can legitimately be used to fund other parts of the council that have a public health element to them (Finch and Vriend, 2023). 12 interviewees described how their councils are doing so to fund elements of the **trading standards** and **environmental health** teams, such as working with restaurants to improve the health profile of dishes or tackling food hygiene or food fraud problems. One officer working across functions said of his council's public health lead: "she got this disparate team together that weren't traditionally food or health and safety and were perhaps a little bit more flexible in their approach to work and what they would do."

In contrast to public health (with its relatively large budget), regulatory services, like trading standards and environmental health, have been cut drastically in recent years (Coynes, 2019; Herriman, 2021; NAO, 2023). One trading standards specialist said: "Nobody has got any money to do anything and the primary driver for that is not only the budget squishing but also the massive increased demands in adult social care... The overspends are because of increasing demand and consistent failures in government to come up with a long-term strategy around adult social care."

**Economic development** and **planning** were also raised by a high number of participants (20 each). Together with public health, this trio of functions was often described as being interrelated. A frequent example given was that of public health teams wanting to restrict fast-food takeaways being sited near schools. If their economic development colleagues are concerned about limiting job growth and business rate income from these restaurants, planning officers may take the side of economic development over public health in supporting unhealthy food businesses to proliferate. This relationship has been the subject of some research already, as noted in the literature review (Caraher *et al.*, 2010, 2013, 2016; Caraher, Lloyd and Madelin, 2014; Blow *et al.*, 2019; Boelsen-Robinson *et al.*, 2021; Moore *et al.*, 2022).

Discussing this example with people representing the other functions added nuance to this argument. According to interviewees with experience in planning often feel this characterisation as acting against public health to be unfair, with one interviewee noting that planning as a distinct discipline has its roots in public health and that some councils host these functions within the same directorate (LGA, 2018b; McKinnon *et al.*, 2020). Two interviewees with experience of the planning system noted too that even when the council's own planning department supports the public health team to limit takeaways, they are often overruled on appeal by the Planning Inspectorate (see *Analysis* for more on this issue). The legal fees and officers' time involved in such cases are so expensive that some councils are resigned to such businesses growing. A public health specialist said of their planning colleagues: "it's a tough, tough job because ... economic growth, jobs, just seems to be the number one priority and they're not looking downstream".

The concept of **sustainability** was emphasised by a significant number of interviewees, 16 individuals, to such an extent that I decided to include it as a separate function within a modified IfG list. This was often in the context of councils finding ways to tackle their carbon emissions through interventions in the food system. 13 interviewees discussed food waste specifically, with four noting the challenge created by England's two-tier local government structure. Lower-tier authorities (district councils) are responsible for **waste collection and recycling**, whereas top-tier authorities (county councils) are responsible for **waste disposal**, which inevitably leads to confusion and conflict. For example, if a district council wants to collect food waste but the county council just combines it with household waste, the extra expense of separating waste is, well, wasted. Waste was described by four respondents as being especially politically divisive, with any changes to bin

collections expending a great deal of political capital and goodwill for only marginal gain. Despite many councils' goals to cut food waste and improve their environmental performance more broadly, they have limited powers or policy levers to help them do so, according to my interviewees' responses. One waste specialist had this to say: "There's not a national plan for food waste infrastructure. It's organic, it's left to the market, or for councils to go out and find a provider. ...there's a lot of variation."

The **education and skills** function was also cited by a high number of interviewees (16) despite only one interviewee working in this field. This was often in the context of improving the diets of children and young people. This is made much easier in the devolved nations: as one Scottish interviewee explained, local authorities in Scotland are closely involved in running schools and school food (gov.scot, 2014; Education Scotland, 2023). In contrast, the UK government's move toward schools in England becoming academies (and therefore not under the control of the local authority) (HM Government, 2022) means local authorities have less influence on the catering (Kaklamanou, Pearce and Nelson, 2012). According to another interviewee familiar with the sector, school food in England (in both maintained schools and academies) is increasingly delivered under contract by the private sector, further increasing the remove from local authority public health teams.

There were several functions that I struggled to engage with and for whom I believe food policy is (or should be) a much more important consideration. As described above, I could not persuade anyone with experience of **adult social care** to participate in the interviews, though this function was mentioned by eight interviewees, nor for **children's services** (mentioned by six interviewees).

Providers of care for adults and children are collectively responsible for feeding vast numbers of people. In 2022, just over 400,000 children in England were in the care of their local authority (roughly three per cent of the 12 million total children) (gov.uk, 2023b). In the same year, more than 252,000 adults received *short-term care* (usually in their own homes) provided by their local authority (NHS, 2022), while 817,000 adults received *long-term care* from their local authority, of which 30 per cent were in council-run nursing or residential homes (NHS, 2023). I would argue there is an important but perhaps neglected food policy link here. Improving the food in institutional settings may improve the experience and health outcomes of people living in them (Herne, 1994; Crogan *et al.*, 2013; gov.wales, 2019). This is especially important for people in residential care: 35 per cent of people admitted to care homes in the UK in 2021 were malnourished (Merrell *et al.*, 2012; BAPEN, 2021).

I also tried (and failed) to engage with **markets and fairs**, despite the obvious links with food.

There was then a 'long tail' of more tangential functions that were mentioned by a handful of interviewees, including **highways** (8), **housing** (6) and **licensing** (6), mostly in the context of obesogenic food environments. **Leisure centres and parks** (7), **arts and recreation** facilities (4), **libraries** (3) and **museums** (1) were described as routes through which to access communities for the promotion of healthy eating and similar public health interventions.

Public toilets, building regulations, burials and cremations, coastal protection, community safety, concessionary travel, elections and electoral registration, parking, and street cleaning were not mentioned by any interviewees. One could probably identify links between *any* function and food policy (note the crematorium operator's example mentioned earlier), but for the purpose of this research, I am more interested in depth than breadth of coverage.

## Food policy issues

The second lens through which I analysed the results is that of the food policy issues raised (summarised at Appendix 8).

I used one category to cover **sustainability, ethics and climate change** because these terms were often used interchangeably by interviewees. This made sustainability the most-mentioned issue (by 23 out of 30 interviewees), often in the context of cutting food waste but also looking at the carbon emissions involved in our food system. Most councils in the UK have declared a climate emergency and many are working actively to reach net zero targets for their areas (Bawden, 2022; CED, 2023; LGA, 2023d).

Many respondents (20) discussed **healthy eating and nutrition** as a significant focus of their work and it spanned many council functions and professional disciplines. For example, in the context of public health, practitioners discussed the importance of promoting healthy eating and supporting local populations to access a balanced diet: "...we're working on something this year to look at [healthy eating] and trying to do things from the system perspective, [delivering] something that's got the social elements, the environment elements, the health element and everything woven together in a way that doesn't feel overwhelming but ... actually ticks the other boxes as well".

Interviewees also frequently mentioned **national leadership** (20), alongside **legislation and powers** (15), with a clear differentiation between respondents in England compared to the devolved nations. In England, many respondents cited the lack of leadership (or even interest) by the Government in matters of food policy, and in particular the rollercoaster of expectation and disappointment arising from the National Food Strategy and its subsequent abandonment by the Government. When asked what would make a difference to the food system, this response from an English interviewee was typical: "A National Food Strategy would be great!" Interviewees in Scotland and Wales noted the clearer policy position, supported by legislation, of their respective governments. This gives them confidence to be bold in implementing positive food system change in support of health, economic and environmental priorities. For respondents commenting on England, the opposite was true; the absence of national leadership means English councils struggle to effect change without the 'cover' provided by the support of Government.

**Poverty, inequality and food insecurity** was a concern for 20 interviewees, with many noting the increasing importance of councils providing food in institutional settings, especially at **schools and in other early years settings** (17). This was often via **free school meals** (9), for which the policy positions and generosity of the Welsh and Scottish Governments made this an easier intervention than in England (Lee, 2022; Nourish Scotland, 2022; gov.wales, 2023) (free school meals are provided by national government, i.e. Stormont, in Northern Ireland). Respondents highlighted a range of approaches by councils in trying to tackle poverty, including support for **food banks** (12 respondents) and other voluntary organisations, as well as direct distribution of food in times of crisis. One such time was during the **Covid** lockdowns in 2020-21, which was cited by 12 respondents as a catalyst or turning point for significant change in the local authority – like stepping up the provision of emergency food aid or recognising the public health implications of the poor diets associated with poverty.

19 interviewees mentioned support for **growing and food production**, ranging from support for individual food growing spaces on allotments and community gardens, through to providing system-

wide support for industrial food businesses. Interestingly, agriculture was often an afterthought for many interviewees, even those working in rural local authority areas. This may partly be because farms are typically more engaged with national agencies like Defra and the Rural Payments Agency than they are with their local authority. However, interviewees with experience in farming described a lack of engagement by many local authorities. One described the situation thus: “There’s two big things that local authorities love. And one of them is they want to plant up the whole area with trees. And the other one is that they want everyone in the district to be vegan.” The point she was making, not unreasonably, is that councils are rarely engaged with the complexities of farming life. A myopic focus on two issues, both of which, they argued, could undermine food production and rural livelihoods, is unhelpful.

**Catering and procurement** was another frequently discussed food policy issue (18 respondents), especially in the context of the council’s role in procuring and serving food, including: for consumption in schools and other institutional settings; provided as part of adult social care services; delivered as food aid; served in council-run leisure centres; and stocked in vending machines in council buildings.

Wales and Scotland appear to be leading the way, with school food largely catered in-house, rather than provided by a contract caterer, across both devolved nations, according to interviewees familiar with these locations. This, they said, enables a level of influence on and support for school food that would not be possible with a contract caterer. Fourteen interviewees with experience in English local authorities recognised the potential for council procurement departments to encourage the provision of healthier food, but described the challenges of first accessing these departments, then persuading them to work differently. The main concern, they say, is cost; there can be a perception that using a contract caterer is cheaper. However, an interviewee from Scotland challenged this view: “We looked at outsourcing, we looked at creating an [arm’s length external organisation]... and ultimately the direct delivery of services within the local authorities was still the most cost effective, that protected quality ... and other local authorities in Scotland have undergone that process as well and come to the same conclusions.”

Three interviewees expressed concerns that favouring local providers may contravene procurement rules, while four others disagreed. Investigating this further with a procurement expert (none participated in the interviews) would be interesting as this issue seems poorly understood. Some organisations (including some councils) say councils cannot discriminate in favour of local businesses (for example SOLACE, 2013; Stevenage Borough Council, 2021). Other organisations say and actively encourage the opposite (for example FSB, 2012; Eichler, 2021; Ashfield District Council, 2023).

**Obesogenic food environments** (17 respondents), **obesity** (10) and **out-of-home** advertising (7) were also described as consistent focus areas for councils, particularly from a public health perspective. Interviewees who raised this issue recognised that councils could make a significant impact through influencing the planning system but found the system hard to navigate. One public health specialist described having two full-time planning officers helping them respond to local planning applications with a public health implication in the correct format and at the correct time.

**Food security and resilience** (at the population level, as opposed to household food insecurity) was noted by 12 respondents, though often tangentially (e.g. as a benefit of understanding the food system better) rather than recognising councils’ role in emergency preparedness and resilience (two

respondents). A Welsh interviewee noted that Wales had recently prioritised the development of horticulture as part of its strategic development goals (Food Sense Wales, 2023). This interviewee explained that Wales does not grow anywhere near enough fruit and vegetables to supply its own population and that the Welsh Government has suggested this needs to change, offering funding and support for this to happen (gov.wales, 2022). The interviewee suggested that devolution coupled with the unitary nature of Welsh local government means measures to support Welsh horticulture (such as councils agreeing to buy Welsh produce for use in schools) is a much simpler proposition than it would be in England. Scotland, too, appears to be working to increase food security and resilience, with one respondent describing a school supplied with bread by the bakery next door and milk from a neighbouring farm (Argyll and Bute Council, 2023).

### Enablers and success factors

Interviewees identified 15 success factors in achieving food systems change. The most frequently cited (26 respondents) was having the **capacity, resources or funding** to do the work. A decade of austerity measures has fallen particularly hard on councils, whose budgets were cut in real terms by 21 per cent from 2009/10 – 2021/22 (Atkins and Hoddinott, 2023). Except for ring-fenced public health activities, this has presented councils with difficult choices about what to prioritise. Based on interview responses, those councils who are giving food policy the attention it deserves are having to demonstrate the value of doing so, lest funding be diverted to other areas. Even discrete food-related areas like budgets for sampling in trading standards have been cut severely in many councils. Doing so increases the likelihood that fraudulent or dangerous products will be sold to consumers but preventing such theoretical cases can seem like a luxury when considered alongside an ever-growing demand for social care.

**Political leadership and cross-council support** was another frequently mentioned success factor (22). Of these, 16 respondents described the need for political leadership to secure funding and undertake the work involved, as one might expect. However, six respondents noted a *lack of engagement by politicians* as being more helpful. Councillors ‘getting out of the way’ or simply not paying attention to food policy matters, perhaps due to more pressing priorities elsewhere, and therefore ‘not interfering’, was desirable for many local government officers. One interviewee in an English council had this to say about the process of getting its cabinet to sign off a landmark food policy document: “I think a lot of them just go, *oh yeah, it's just a strategy* and they didn't really think about it, though we did put it on all of their seats.”

Political leadership also manifests itself differently in the devolved nations: the complex political landscape in Northern Ireland means people across the public sector have had to find ways to deliver their functions in the absence of government. As one interviewee in Northern Ireland put it: “[in the absence of a national government at Stormont] it's a very voluntary thing that councils are taking a lead on food but they recognize the need to do it because of our poverty here. We have high levels of inequality and deprivation; we have an economy that's really slow and sluggish; and we have a climate emergency as well.”

Scotland and Wales both appear to have more collegiate approaches to politics. Respondents in Scotland and Wales both highlighted levels of cooperation within coalition governments that would be unthinkable in England. Issues like free school meals, which are deeply divisive in England (Murphy, 2020; Weale and Adams, 2020; Kentish, 2022; Vickers, 2023), enjoy widespread support

across the political spectrum in Scotland and Wales, according to interviewees from both devolved nations. One Scottish interviewee described it thus: “When it comes to the policies like universal free school meals, there is no dissension. SNP supports the policy, the Green Party supports the policy, Scottish Labour Party supports universal free school meals, Scottish Conservative Party supports free school meals. And so it’s like there is political unity around public food in Scotland.”

**Priorities** (22 mentions) and **localism** (18 mentions) also scored highly as enabling factors. These related terms effectively mean the ability of local authorities to decide what to focus on based on the unique needs of their local population. A good example is the Welsh Government’s push to develop Welsh horticulture, described above. Although well-established in England, horticulture in Wales is currently underdeveloped and presents an opportunity for sustainable growth (gov.wales, 2022; Food Sense Wales, 2023). Left to the Government in Westminster, this focus would be unlikely to materialise, according to two interviewees based in Wales. But devolving this area of policy to the Welsh Assembly enables it to develop targeted interventions to support local priorities.

A possible drawback of localism is that councils waste time developing ‘local’ responses to issues that are consistent from one area to the next, or that could be better managed at a higher level. Food waste typifies both challenges: two interviewees with expertise in waste described the granular scale of local government as being poorly aligned with the vast capital expenditures and long-term timescales needed for effective waste management solutions. These interviewees described the challenges of setting up consistent and coherent waste collection policies in neighbouring councils in two-tier parts of England. Getting everyone to agree on expensive, long-term solutions at the same time is, they said, extremely challenging.

As mentioned earlier, forming **partnerships**, especially with local businesses, charities, community groups and healthcare providers is noted by many interviewees (18) as being critical to their success. These partnerships often come in the form of Sustainable Food Places, though even informal partnerships can achieve more than councils or other partners could do working in isolation. The council often acts as an ‘anchor institution’ (CLES, 2023) in a local partnership, acting as a provider of capacity, resources and expertise but also being an operator of services, a major employer and a buyer of food. Building a **coalition of support**, proactively **engaging stakeholders**, was cited by 15 interviewees as being an important precursor for food policy interventions to be successful and sustainable. Having a **named champion** (16), having the right **personalities** involved (12) and **building relationships** (nine) were described in similar terms. **Co-creation** (or co-production) is a fashionable term in public service and the voluntary sector and means involving service users in the design of the services they will use (LGA, 2023b). Co-creation was mentioned by six respondents as an important enabling factor for achieving successful food policy interventions.

A common refrain in describing ‘what works’ is adopting **systems thinking** (16). Birmingham has done more of this than perhaps any other council, having established a specific function to look at the food system and adopted a Food Systems Strategy (Pullen *et al.*, 2022). For many interviewees, systems thinking has helped them to understand the food system better but also to make more tangential links within and beyond the council, building coalitions of support and leveraging all the assets at a council’s disposal to achieve change. Examples included housing providers working with local schools to provide spare land for community growing; using food festivals to drive footfall, develop local economies and promote healthy eating messages; mapping small growers and producers in relation to council catering venues to match local supply with demand; and simply

making food policy within the council coherent across the different departments to present a consistent view to residents and businesses.

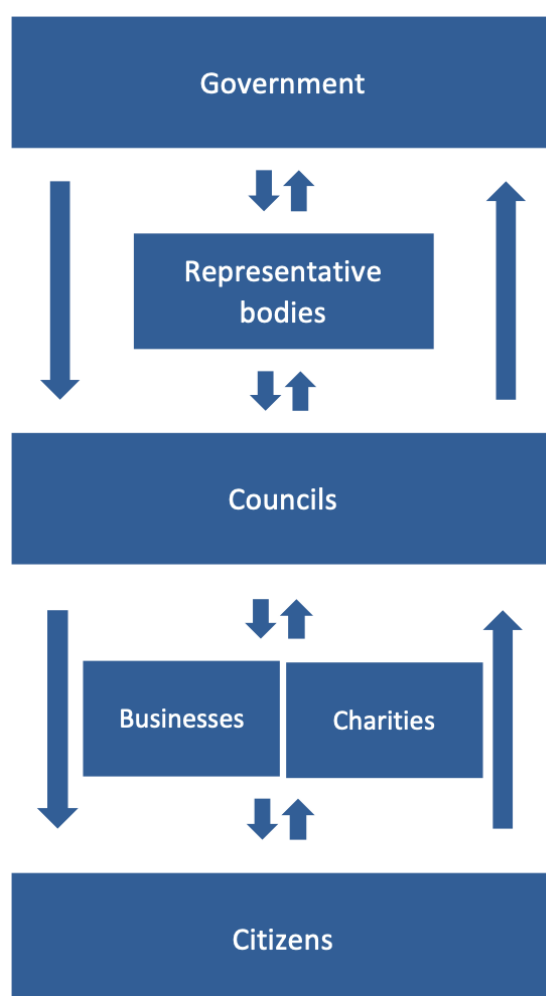
**Long-term thinking** was cited by eight interviewees as an enabling factor, though all those who mentioned it noted how hard it is to achieve when politicians are focused on four-year election cycles. Many food policy interventions take time to implement and even longer to yield results, meaning they often fail to make it up the list of priorities. However, for those councils that have taken a longer-term view (such as the council that bucked the trend by retaining its landholdings instead of selling them to cover operating costs) doing so has often paid off. Interviewees from local authorities that typically keep the same political leadership from one election to the next reported being more able to effect long-term change than those whose party of leadership changes frequently.

## Discussion

### Critical analysis

Primary research question: How is food policy made, interpreted and implemented in local authorities in the UK?

Food policy is made, interpreted and implemented in UK local authorities in a complex network of stakeholders and organisations, summarised in Figure 7, below. Perhaps the most obvious, and most linear, policy development route is that of central government setting food policy priorities for councils to interpret and implement. A good example of this is the Government setting out restrictions on marketing HFSS foods (gov.uk, 2023c), which local authorities are then expected to enforce (Parr, 2022; Quinn, 2023). Where these rules are complex or ambiguous, national co-ordinating bodies can support practitioners and establish consistent standards for enforcement. Joint work by the Association of Convenience Stores, Buckinghamshire and Surrey Trading Standards and Woking Borough Council led to highly praised guidance on the new regulations (ACS, 2023a).



*Figure 7: Conceptual diagram showing the main interactions in local government food policymaking*

This 'top-down' approach is not the only way food policy gets implemented in local government, however. Many councils have proactively developed their own food policy interventions, either separate to, or in the absence of, national government leadership. As one interviewee in an English



council put it: "At a local level, it would be easy to say *There's only so much we can influence; we have to wait for national government* and there's a big degree of that, that the big stuff has to be agreed nationally, but you can't wait for that. You have to get on and do as much as you can locally."

Examples here are the Food Justice Action Plan developed by the London Borough of Lewisham (Lewisham, 2023) and Birmingham City Council's Food System Strategy (Pullen *et al.*, 2022). Many councils also act as facilitators of ultra-local grassroots policy interventions, convening partnerships of voluntary organisations, businesses and academics to set out the changes they would like to see in their location. Recent work in Sheffield (Treuherz, Yap and Rowson, 2023), Carmarthenshire (SFP, 2023b) and Belfast (SFP, 2023a) typifies this approach, which recognises the agency that local authorities have to prioritise food systems change in the absence of a legislative mandate.

Local authorities can influence national policy development, sometimes via the representative bodies mentioned above. A good example of this would be free school meals, in which individual councils (Duncan, 2023; Griffith, 2023), regional government (Mayor of London, 2022) and national representative bodies (LGA, 2023e) have lobbied Government for more equitable provision of free school meals. Such advocacy, while not always immediately successful, helps to demonstrate the strength of public opinion to central Government.

Secondary research question (1): What can policymakers do to increase the likelihood of success when proposing interventions delivered by local authorities?

My research interviews highlighted several enabling factors for policy interventions to gain traction among local authority stakeholders. Prescribing a checklist of measures to increase the likelihood of success would have been very pleasing but the reality is much messier.

The first and perhaps most important theme identified in my research is the need to ensure those tasked with implementing the policy have the **capacity and/or resources** to do so. Again, a good example of why this issue matters is the UK Government's spasmodic introduction of marketing restrictions for HFSS foods, and assumption that local authorities would conduct the necessary enforcement action (ACS, 2023b; DHSC, 2023). The Government allocated meagre funding for this to take place and did not create mechanisms to support councils (or even record how much enforcement action was taking place). As a result, the Chartered Institute of Trading Standards (a national representative body) said this was likely to be a low priority for its members (Parr, 2022; Quinn, 2023).

To some, this is exactly how localism is supposed to work, with councils being given a nationally agreed framework of powers but discretion to focus on local priorities (DCLG, 2011). A less optimistic reading of the situation would say this is indicative of a fragmented and under-resourced system, in which national government devolves powers without resources, allowing them to claim credit for successful interventions while blaming local authorities when they do not go according to plan. As one interviewee put it: "businesses which are impacted [by the HFSS marketing restrictions], they've invested a lot of money ... to comply with these policies, have changed their whole stores. And it feels strange if trading standards aren't really enforcing that policy after you've committed to it."

A second theme for those wishing to effect food policy change at the local level is **navigating the complexity of actors and relationships** between them. Local government has a wide range of functions with wide discretion on how to structure and deliver them. Food policy issues, as described above, frequently span several functions, often in ways that do not sit neatly together.

The potential conflict between public health, planning and economic development is a good example of this challenge: the planning department is often more closely aligned to either public health or economic development, leading to tension when trying to tackle obesogenic food environments (Caraher *et al.*, 2013). This is especially the case for trying to influence the content of adverts on council-owned assets, following the example from TfL. One interviewee noted the example of a council that delegated responsibility for managing adverts (and the income they generate) to dozens of departments, including transport, highways, libraries, leisure centres, schools and art galleries – in fact, any council department that had even one advertising location. Effecting change in such environments requires tenacious and persistent stakeholder engagement.

Another example of the complexity of local government is the **two-tier setup** found in England. This is especially apparent in efforts to tackle food waste, where the conflict between waste collection (districts) and waste disposal (counties) has led to a vast patchwork of arrangements at a granular scale not suited to the expensive, long-term interventions needed to deal with waste efficiently. In response, the waste charity WRAP has evolved from a campaigning organisation to being an important ally of local authorities who want to reduce waste and improve recycling, providing marketing materials, good practice guidance and even benchmarking data to help with these waste reduction efforts (WRAP, 2023b).

A third, consistent theme of my interview responses was the need to **engage a wide network of stakeholders to build a robust coalition of support**. The importance of partnership working and relationship building came up frequently, with a related theme of having a named champion and/or someone with the right personality to galvanise support and act as a figurehead for proposed improvements to the food system. This is widely demonstrated by the network of 90+ Sustainable Food Places partnerships in operation across the UK (SFP, 2023e). At least 10 interviewees represented organisations that are Sustainable Food Places, all of whom suggested that this is an effective way to build a food-focused coalition of support.

The next step from building a partnership is **recognition of a food system and understanding the local authority's role within it**. This theme came across repeatedly in my interviews and there appears to be growing recognition of the importance of systems thinking in local government. As described above, Birmingham is among the most advanced local authorities in terms of adopting a systems approach (LGA, 2022a; Pullen *et al.*, 2022). As the largest local authority area by population, Birmingham's size means having a dedicated team is more realistic, as well as necessary: co-ordinating services and policy interventions for 1,000,000+ residents is a vast undertaking. However, smaller councils are also seeing the benefits of adopting systems thinking when trying to influence food policy, including the London Boroughs of Newham and Southwark, and Brighton & Hove City Council, among others (LGA, 2023a).

Secondary research question (2): What are the main areas of food policy incoherence in UK local authorities and how can they be resolved?

I included the term 'policy coherence' in the title of my research, so it was not a surprise that interviewees acknowledged it, but it was clear that many of them recognised that part of their role was not just in proposing or implementing isolated food policy interventions but in proactively finding ways to make these policies coherent with those of other council functions.

To address this research question, I used the policy coherence analysis framework proposed by Hawkes and Parsons (2019), described under *Methodology* and summarised at Table 1. My expectation at the start of this research was to find many examples of policy incoherence. While some examples of policy incoherence clearly exist (set out below), it is worth noting that all the interviewees I spoke to were very clear about how *most* local government food policy *should* align reasonably coherently. One particularly enthusiastic interviewee in Scotland described how they try to achieve this in practice:

“I work quite closely with colleagues across [the] Council and across other public sector partners when we are developing anything around food. So a good example is how we're going to implement the Good Food Nation Act ... And so I work very closely with all the different departments within the Council to make sure that we're all either delivering for and working on it and codesigning a plan that works best for our communities, or our communities are helping us to codesign that too. We're not imposing something on them, so it's very much something that we work on in partnership.”

Feeding the population a safe, healthy diet which provides gainful local employment and is also environmentally sustainable *should* be possible (Willett *et al.*, 2019; Dimbleby, 2021) – these are all prime local government food policy concerns about which there is little argument (at least in principle) (LGA, 2022c). For sure, the policymaking landscape is incredibly complicated, and councils must make tough decisions about what to prioritise and what to drop (Baynes, 2023; Kenyon, 2023). However, this does not have to mean policy incoherence – just that some desired interventions may not be affordable. Or, as Kingdon (2014) describes, it might be that the *problem* (unhealthy, unsustainable diets), *proposed solution* (interventions to make the public realm less obesogenic) and the *political support* (especially from national government) have not yet coalesced to enable a *policy window* to open and reforms to be implemented.

I identified some promising areas where councils are working to connect different functions and policy priorities, a good example of which is in trading standards and environmental health. Despite historic media portrayals of bureaucracy and red tape, I identified numerous examples of councils working hard to make the best use of their resources and present a coordinated, coherent approach to regulation and enforcement.

For example, in one council for which tourism is a high priority and a big contributor to the local economy, trading standards and environmental health teams have devised processes to reduce the number of visits by different colleagues to the same premises. Council officers make a conscious effort to conduct as much inspection activity as possible outside of busy trading times or during peak holiday season. This reduces the need for operators to take time away from serving customers. This is not ‘scaling back’ enforcement activity; indeed, they have maintained a reasonable sampling budget and full complement of staff. They have also worked hard to demonstrate the value of regulatory services to businesses, in ensuring visitors have a great experience and come back to the area (rather than experiencing food poisoning and never returning). While it is fair to say businesses do not always relish a visit from the council, most would acknowledge the importance of maintaining high standards to ensure the tourist trade remains sustainable.

The most frequently cited and well understood example of policy *incoherence* is the tension between public health, planning and economic development in tackling obesogenic food environments through planning policy. 17 interviewees confirmed that this is indeed problematic,

with a high degree of incoherence between pro-business policies intended to boost trade and health-focused policies to cut fast food consumption (Caraher *et al.*, 2013). On the face of it, this is **horizontal incoherence**, in that it occurs at the same level of authority within councils.

However, as noted by several interviewees, the issue is more nuanced. First, for economic development officers, the presence or absence of a few takeaways is immaterial to a council's prosperity, so they are unlikely to object. Second, more forward-thinking economic development officers recognise the potential for high streets selling healthy food to be a point of differentiation and a way to grow footfall and sales (TPIHC, 2018; ALEHM, 2023). Instead, as noted by six interviewees, it is the Planning Inspectorate that interferes in local planning cases and typically sides with the restaurant operator rather than the council. The Planning Inspectorate is a central Government function within the Department for Levelling Up, Housing and Communities. In overruling the council's powers to shape its high streets and curtail the growth of fast-food outlets, the Planning Inspectorate is moving this from a simple case of horizontal incoherence (that could be managed entirely within the council) to vertical incoherence, which is much harder for a council to address unilaterally. Interestingly, the Planning Inspectorate recently sided *with* the local authority (Tyneside) and *against* the fast-food operator Papa Johns, for the first time (Gill, 2023), so perhaps this situation is now starting to change.

The interviews revealed several other examples of **vertical incoherence**. Efforts to improve food waste collection are often thwarted by the lack of national legislation or guidance. Waste collection nationally is atomised and fragmented, with arbitrary regional groupings that exist only for that function (Widdowson, Sankey and McElearney, 2015). Navigating this system, one of many examples of fragmented and multi-layered governance, makes interventions to cut food waste especially challenging. This is despite strong evidence of what works (segregated and frequent food waste collections, ongoing communications about the benefits) (WRAP, 2023a). However, in the absence of national leadership, local authorities lack the political cover needed to make potentially unpopular changes to local services. In England, the atomised, two-tier nature of local government further confounds efforts to coordinate and harmonise waste management policies, leading to incoherence within and between neighbouring councils. This issue of national leadership is thrown into sharp relief in the devolved nations: Scotland and Wales have both passed legislation to establish clear food policy priorities. They have made considerable progress in developing local food strategies and have clear goals for improvement. In contrast, the English government largely abandoned its long-awaited National Food Strategy, resulting in a lack of coordination and vision (LGA, 2022c).

Another example of vertical policy incoherence concerns poverty. From a public health perspective (among others), councils want to see their residents enjoying a healthy, balanced diet with a good range of fruit and vegetables and limited consumption of junk food (GLA, 2018; LGA, 2022c). More than a decade of austerity cuts to the welfare system and to local services mean it is now harder than ever for people on low incomes to access affordable food (Ronson and Caraher, 2016; Caraher and Furey, 2018; Barker and Russell, 2020; Goudie and Hughes, 2022). Indeed, Government policy explicitly saw food banks, not the state, as being responsible for feeding those who could not afford food (Ronson and Caraher, 2016). This is another clear example of vertical incoherence, where national government policy is to cut welfare spending and local government policy is to tackle obesity and improve nutrition. The two goals are not compatible, and national government policy is undermining local government policy objectives. In another example: one interviewee suggested

Wales had been “shafted by UK Government,” whose poor management of the transition to a new Protected Geographical Indication scheme, post-Brexit, had failed to address Welsh language requirements (Henderson, 2021).

One might expect to find a fair amount of **geographical policy incoherence**, given the fragmented nature of local government in the UK. Indeed, many would describe differing policies between councils as an expected, even desirable, feature of our devolved system of government (Torrance, 2022). Based on the literature review and the interviews, I found relatively few areas of geographical incoherence (not counting the distance between national government and local councils, which I have considered as ‘vertical’ more than ‘geographical’ incoherence because it is mainly a function of power, not location). That said, I was struck by how few interviewees noted ‘neighbouring councils’ among their stakeholders. Despite many councils having excellent links with the charities, businesses, healthcare organisations and so on that operate *within their boundaries*, there is very limited joint working *between councils*. As one London-based interviewee said of their council: “I generally don't think that we do enough work with other London councils. We have a big voluntary sector in [borough], this is quite a defining thing about the borough ... and so I think that's generally our sphere of influence which seems to be quite community-based.”

When councils do work with their neighbours, it is often a noteworthy exception (such as Buckinghamshire and Surrey’s joint trading standards function) (Buckinghamshire Council, 2023). Six interviewees who did not work for local authorities noted the propensity to have the same conversation over and over again as they engaged with different councils. An interviewee representing farmers had this to say of the process of engaging multiple neighbouring councils: “And the people in charge had been saying *we don't even think about our neighbours, we've not thought about the authorities beyond us, really, because we're only in charge of our authority*. So I think that it's going to come down to Natural England to stitch the edges together. Which, I don't know if that's the best way of doing it, or whether there could be less of a burden if the authorities work together, or whether they're going to rely on me to keep it consistent across all the ones that are next to each other... it's pretty complicated.”

The only exception to this siloed working (that I found) comes from trading standards. Through the primary authority principle, in which a multi-site business only needs to seek advice from one council’s trading standards department (usually the one in which their head office is located), the amount of time businesses spend dealing with local authorities is dramatically reduced. This also benefits local authorities, as they do not have to ‘reinvent the wheel’ when their opposite number in another council has already provided support and guidance. Other council functions could benefit from adopting a similar approach.

The final dimension of incoherence noted by Hawkes and Parsons is **temporal** (in other words, conflict between policies with different timescales). Much as for geographic incoherence, there is a certain amount of overlap between vertical and temporal incoherence. I did identify some short-term thinking in some council functions: the proximity of service users to town halls (compared to constituents to parliament) probably explains this greater sense of urgency. As one public health specialist noted: “Where public health is about health of generations now and in the future, we have to balance the two together. Like of course we need the short-term health outcomes, but if we just keep ploughing money into the short-term health outcomes, we never get further upstream to try and prevent them in the first place.”

The planning / public health / economic development relationship is a good example of this kind of incoherence: employment figures, business openings, busy high streets and receipt of business rates are typically immediate results; the deferral of obesity-related ill health is much longer term and harder to attribute to a particular individual, organisation or policy intervention. Where councils are struggling to reconcile the views of economic development officers and public health teams, this temporal trade-off is often at the heart of the debate. Conversely, National Government introducing restrictions on HFSS marketing is broadly coherent with councils' aims to reduce obesity by tackling obesogenic food environments.

Incoherence... or lack of interest?

As noted in my results, three local government functions that I felt *should* have had an interest in food policy do not (or at least, the representatives of those functions that I spoke to did not). These functions were social services (including adults and children), markets and resilience.

Councils in the UK spent £26.9bn in 2021/22 on providing **adult social care** (The King's Fund, 2023). Although much of this is spent on staff and facilities, a sizeable chunk will be used to buy and provide food. Co-ordinating the procurement activity to align this expenditure with other council food policies (such as favouring local growers and producers or limiting HFSS foods) could have a huge impact. 818,000 adults receive social care in England alone, provided by a workforce of around 1.5m people, so there is also a huge population whose health could be improved through co-ordinating policy between public health and adult social care functions (CMA, 2017; The King's Fund, 2023). Scant research on food in care settings exists but a widely cited study from Sheffield Hallam University noted an average daily spend per head of £2.44 (Dinsdale and Egan, 2017). There is a similar opportunity in children's services: more than 10,000 children live in a local authority children's home at any one time in England, at an annual cost of £11.1bn in 2021/22 (Fright and Davies, 2023). This is both a huge budget (and therefore significant buying power to shape the market), as well as a large population whose health, and experience of the service, could be improved by provision of healthier food.

The **markets** function is another that I was surprised not to see mentioned more often in the literature review and that I struggled to penetrate with interviews. Data from 2017/18 (the most recent available) states there were 1,173 markets in the UK, of which 82 per cent are operated by local authorities. In that year, consumers spent more than £3.1bn at markets, much of it on food (Savage, 2018). As some councils are finding, the promotion of markets provides opportunities to support residents with cost-of-living challenges, drive footfall to town centres, encourage consumption of fresh fruit and vegetables, support local businesses, encourage local growers and producers and even promote active travel – a wide range of food-related policies that could be addressed by influencing a stakeholder group that is generally licensed, regulated and promoted by the council (Messer, 2017; Kyle, 2022; LGA, 2022b; Lewisham Council, 2023; Mission 4 Markets, 2023).

The final function absent from my research results is **emergency planning and resilience**. The Civil Contingencies Act (2004) created specific duties for local authorities to plan for emergencies but the focus is largely on very short-term, very localised issues such as floods or terror attacks. Unlike almost every other local government function, no representative body exists for council emergency planners (the Emergency Planning Society is international and is more of a trade body). This co-

ordination role is largely fulfilled by the LGA and its devolved counterparts. Their guidance on emergency planning scarcely mentions food (and does not suggest councils do anything to plan for interruptions to the food supply) (LGA, 2018a). Brief supply chain challenges at the start of the Covid pandemic did seem to highlight the fragility of our food system, though its rapid reconfiguration seemed to quickly quell any concerns (Wentworth, 2020). Campaigning group Sustain developed guidance for local authorities that highlights the importance of providing emergency food aid (and means of doing so), though this appears to have been shelved now the pandemic threat has passed (Sustain, 2020). This theme was mentioned very rarely in my interviews, and it feels remiss that this work to prepare for the next food supply shock appears not to be taking place.

### What the research adds to the field

This research is perhaps the first study of policy coherence looking specifically at local government in the UK (see *Literature Review*, above). The research builds upon recent work to understand food policy coherence in general and in UK national government bodies in particular (Hawkes, 2017, 2018; Hawkes and Parsons, 2019; Parsons, Sharpe and Hawkes, 2020; Parsons, 2021). The research moves beyond understanding policies and functions as isolated entities to look at the relationships between them, and proposed success factors for food policy interventions in UK local government. The findings show it is possible to effect meaningful change in local government food policy. There is already a high degree of policy coherence across many council functions but improving connections between some outliers (notably social services and public health) would aid policy coherence.

### Study limitations

#### System boundaries

I limited my research to the UK. While there are likely to be some consistent themes and parallel issues in other countries, it would not have been feasible to address them here. This research therefore probably has limited relevance outside the UK. Despite the complexity of local government in the UK, it is a clearly defined system with fixed geographical boundaries. I deliberately sought out respondents from across the devolved nations of the UK: as shown in the results, there are important regional variations that have implications for policymakers (and indeed anyone trying to navigate local government food policy in the UK).

#### Participation

The main constraint on the research was the availability of interviewees and my time to speak to them. I took a pragmatic approach to scheduling interviews, prioritising umbrella organisations who could validate or correct assumptions across multiple local government functions and potentially make introductions to important interviewees. However, I could have spent more time (*ad infinitum*) conducting more interviews. While I am pleased with the coverage I achieved, as noted previously, an absence of evidence in the interview data is not evidence of absence of links between functions.

It is also worth noting that many of the interviewees were either self-selecting, or chosen from a small group of focused, passionate individuals who have chosen to get involved in a co-ordinating body for their profession. Many of them described effective, joined up, well-resourced work in local authorities across the UK. However, it is probably fair to say that this level of high performance is not typical of all local authorities, many of which are under huge financial pressures and are struggling to even deliver the basic services (COSLA, 2022; Hoddinott, 2023; Wallis, 2023).

## Conclusion

This research sought to understand the different functions of local government in the UK that have an interest in food policy. While food policy is largely developed at the national government level, it is typically implemented by local authorities. The system of local government in the UK is very complex (LGA, 2023f), with a wide range of functions delivered by councils (Paun, Wilson and Hall, 2019). This is complicated further by devolution, both to central governments of the devolved nations, Wales, Scotland and Northern Ireland, as well as more recent developments to create regional metro areas in England (Torrance, 2022). England's local government is complicated further still by the patchwork of unitary and two-tier councils (ONS Geography, 2022; gov.uk, 2023c; LGA, 2023f). Efforts to implement food policy initiatives therefore often rely on involvement of local government. As noted by my interviewees, understanding which part(s) of local government need to be involved, and how best to access them, can prove challenging.

My literature review showed a paucity of research into food policy in UK local government. The local government public health function has been the subject of the most research (Caraher, Lloyd and Madelin, 2014; Caraher *et al.*, 2016; Brown *et al.*, 2021, 2022), though explicit studies of local authorities in this context were limited. Regulatory services (trading standards and environmental health) have also been subject to some research (e.g. Harrison, Flynn and Marsden, 1997; Patel *et al.*, 2018; Muir *et al.*, 2023), though typically at an ultra-local level (within a single local authority at a time). Some research makes promising suggestions for food policy interventions, such as councils using their markets to drive footfall, encourage healthy eating to people on a restricted budget and to revitalise town centres (Hall and Sharples, 2008). The role of councils as providers of food, for example in social care settings (Herne, 1994; Merrell *et al.*, 2012) and schools (e.g. Nelson, 2013; Aliyar, Gelli and Hamdani, 2015; Lalli, 2021; McIntyre *et al.*, 2022), also suffers from scant research.

To address the research gap, I interviewed people who work in or with local authorities and whose function or domain experience includes food policy matters (30 people in total). I conducted a series of one-hour online interviews to find out which functions are involved in food policy, how they work together, and how they relate to non-council stakeholders. I asked for case studies of good practice, as well as for examples of functions or agencies that have been hard to access. The interview feedback revealed several consistent themes. The first was that some local government functions (notably public health, trading standards, environmental health, planning, economic development, education, sustainability and waste) have a much greater interest in food policy than others. There are also some functions that I believe *should* have a strong interest in food policy, but I could not get anyone representing those functions to discuss it (notably adult social care, markets and emergency planning).

The interviews also highlighted a wide range of food policy concerns, including sustainability, healthy eating, national government leadership, poverty, food production, institutional catering, early years nutrition and obesogenic food environments. Overall, interview feedback suggested a high degree of policy coherence between different functions within councils, though with some exceptions (notably planning, public health and economic development in tackling obesogenic food environments). Incoherence tended to occur vertically (i.e. between councils and government agencies) more than it did horizontally (within and between councils).



Interviewees cited many examples of good practice, much of which is enabled by robust partnership working arrangements and with support from the voluntary sector (notably SFP, 2023f)). They also helped to identify some consistent success factors for implementing food policy interventions in local government, namely funding and resources, political leadership, stakeholder engagement, systems thinking, prioritisation, and localism (as well as partnership working).

There are many places around the UK where councils are doing innovative, forward-thinking and joined up work to bring about positive change in our food system (such as SFP, 2020, 2023c, 2023d, 2023a). Policy coherence is higher than I had expected at the outset, though the sheer complexity of local government in the UK can still frustrate efforts to effect change beyond the boundary of a single local authority. The Government's abandonment of the National Food Strategy (LGA, 2022c), and frequent prevarication on legislating for change (Parr, 2022; ACS, 2023b; Quinn, 2023), have hampered efforts by local authorities to do more. More robust legislative interventions by the devolved governments of Scotland (*Good Food Nation (Scotland) Act, 2022*) and Wales (*Well-being of Future Generations (Wales) Act, 2015*) put the English Government's efforts into sharp relief. While many green shoots are now sprouting (e.g. Pullen *et al.*, 2022; Bradford Council, 2023; Bristol Food Network, 2023; Treuherz, Yap and Rowson, 2023), my interview findings suggest local authorities could better co-ordinate their work, both with each other and within their own functions, to reduce duplication, replicate what works and improve our food system.

## Policy Implications

The evidence from my interviews suggests that more national coordination would be beneficial. The FSA does this already to an extent (FSA, 2023a), but more in the absence of any other government department for food (Lang, 2021) than as a clear part of its mandate. National representative bodies all help with this but without a clear food policy focus. Despite food policy coherence being reasonably high, the organisations working on it are disjointed and their strategies fragmented, according to my interviewees.

The literature review, supplemented with interview evidence, also illustrates the remarkable level of complexity in local government in the UK. It would be easy to say ‘this should be made simpler’, for example, by converting the remaining two-tier council areas in England into unitary authorities. Although this is probably the direction of travel, change is slow (Sandford, 2020; Copus, 2023). The elected politicians responsible for doing so have no incentive to make themselves redundant (Copus, 2023). Moreover, granular local authority boundaries are part of a longstanding and celebrated localism agenda (DCLG, 2011; UK Government, 2011). Being pragmatic, then, policymakers should be aware of this complexity when designing interventions, rather than hoping to eliminate it. They should be clear on which tier of government is responsible for the intervention they are proposing, and where this sits in the system (particularly in relation to devolved governments).

Where good practice has been highlighted, it is almost always taking place in the context of a local food partnership. Local authorities, voluntary organisations and citizens may find going through the partnership to be an easier way to effect change than trying to do so unilaterally (SFP, 2023f). Where partnerships do not exist, setting them up may increase coherence locally (Jones, Hills and Beardmore, 2022). There are now tried-and-tested means of doing so (Sustainable Food Places, for example).

While I found policy coherence to be relatively high (particularly within councils), there are other obstacles to achieving successful food policy change. Chief among these obstacles is the need for capacity, resources and funding. Local government receives the lowest level of funding and is responsible for more functions than has been the case for decades (Atkins and Hoddinott, 2023). As a result, individuals and whole departments are stretched (Baynes, 2023; CTSI, 2023; Economist, 2023). For stakeholders outside local government (like national government departments) seeking to implement policy interventions that will be delivered by councils, these interventions are unlikely to be successful unless backed by robust, long-term funding (Zerbian *et al.*, 2022). Local authorities, particularly in England, could take bolder steps to achieve more with less, for example by moving to unitary council structures, sharing teams (in the model of Surrey and Buckinghamshire Trading Standards) or even merging neighbouring councils (Sandford, 2020).

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## Appendix 1: Functions of UK local government

Function identified by IfG	# of times noted in literature review	Potential sources of interviewees
1. Arts and recreation	1	National Museums Association; Chief Cultural and Leisure Officers Association; Arts Marketing Association
2. Births, deaths, and marriage registration	0	Local Authority Registration and Coroner Services Association
3. Building regulations	0	Local Authority Building Control; Association of Consultant Approved Inspectors
4. Burials and cremations	0	Federation of Burial and Cremation Authorities; Institute of Cemetery and Crematorium Management
5. Children's services	2	Association of Directors of Children's Services
6. Coastal protection	0	LGA Coastal Special Interest Group
7. Community safety	0	LGA
8. Concessionary travel	0	Confederation of Passenger Transport; Rail Delivery Group
9. Consumer protection	12	Consumer Protection Association; Citizens Advice
10. Council tax and business rates	1	Chartered Institute of Public Finance and Accountancy
11. Economic development	28	Chief Economic Development Officers Society
12. Education and skills	22	Department for Education; Local Authorities Caterers Association; The University Caterers Organisation
13. Elections and electoral registration	0	Association of Electoral Administrators
14. Emergency planning	1	Emergency Planning Society
15. Environmental health	17	Chartered Institute of Environmental Health; Association of Chief Environmental Health Officers
16. Highways and roads	1	Chartered Institution of Highways and Transportation; National Highways
17. Housing	3	Association of Local Authority Chief Housing Officers; National Housing Federation
18. Libraries	0	Chartered Institute of Library and Information Professionals
19. Licensing	8	Institute of Licensing

20. Markets and fairs	6	National Association of British Market Authorities; Local Authority Event Organisers' Group; Farm Retail Association
21. Museums and galleries	0	National Museums Association; Chief Cultural and Leisure Officers Association
22. Parking	0	British Parking Association
23. Planning	22	Town and Country Planning Association; Royal Town Planning Institute; Planning Officers Society
24. Public toilets	0	British Toilet Association
25. Public health	53	The Kings Fund; The Health Foundation; Faculty of Public Health
26. Social care	5	Association of Directors of Adult Social Care
27. Sports centres and parks	0	Sport and Recreation Alliance; Chartered institute for the Management of Sport and Physical Activity
28. Street cleaning	0	CleanUpUK; Keep Britain Tidy
29. Tourism	1	Chief Cultural and Leisure Officers Association; Visit Britain
30. Trading standards	13	Chartered Trading Standards Institute; National Trading Standards; Association of Chief Trading Standards Officers
31. Transport	2	Association of Transport Co-ordinating Officers; Transport Planning Society
32. Waste collection and recycling	11	The Local Authority Recycling Advisory Committee; WRAP;
33. Waste disposal		National Association of Waste Disposal Officers
34. Climate change	*	Local Government Association

\*I added this category after the literature review and based on interview feedback, so there are no results to count.

## Appendix 2: Ethics Application Form

## Ethics ETH2223-1982: Rob Kidd (Low risk)

Date Created	11 Apr 2023
Date Submitted	20 Apr 2023
Date of last resubmission	22 May 2023
Date forwarded to committee	13 May 2023
Academic Staff	Rob Kidd
Category	Postgraduate Taught Student
Supervisor	Dr Rebecca Wells
Project	FPM005 Food policy coherence in local government: who does what and why?
School	School of Health & Psychological Sciences
Department	Health Services Research & Management
Current status	Approved after amendments made

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## Ethics application

### Risks

**R1) Does the project have funding?**

No

**R2) Does the project involve human participants?**

Yes

**R3) Will the researcher be located outside of the UK during the conduct of the research?**

No

**R4) Will any part of the project be carried out under the auspices of an external organisation, involve collaboration between institutions, or involve data collection at an external organisation?**

No

**R5) Does your project involve access to, or use of, terrorist or extremist material that could be classified as security sensitive?**

No

**R6) Does the project involve the use of live animals?**

No

**R7) Does the project involve the use of animal tissue?**

No

**R8) Does the project involve accessing obscene materials?**

No

**R9) Does the project involve access to confidential business data (e.g. commercially sensitive data, trade secrets, minutes of internal meetings)?**

No

**R10) Does the project involve access to personal data (e.g. personnel or student records) not in the public domain?**

No

**R11) Does the project involve deviation from standard or routine clinical practice, outside of current guidelines?**

No

**R12) Will the project involve the potential for adverse impact on employment, social or financial standing?**

No

**R13) Will the project involve the potential for psychological distress, anxiety, humiliation or pain greater than that of normal life for the participant?**

No

**R15) Will the project involve research into illegal or criminal activity where there is a risk that the researcher will be placed in physical danger or in legal jeopardy?**

No

**R16) Will the project specifically recruit individuals who may be involved in illegal or criminal activity?**

No

**R17) Will the project involve engaging individuals who may be involved in terrorism, radicalisation, extremism or violent activity and other activity that falls within the Counter-Terrorism and Security Act (2015)?**

No

## **Applicant & research team**

### **T1) Principal Applicant**

Name

[Rob Kidd](#)

### **T2) Co-Applicant(s) at City**

### **T3) External Co-Applicant(s)**

**T4) Supervisor(s)**

[Dr Rebecca Wells](#)

[Dr Christian Reynolds](#)

**T5) Do any of the investigators have direct personal involvement in the organisations sponsoring or funding the research that may give rise to a possible conflict of interest?**

No

**T6) Will any of the investigators receive any personal benefits or incentives, including payment above normal salary, from undertaking the research or from the results of the research above those normally associated with scholarly activity?**

No

**T7) List anyone else involved in the project.**

N/A

## **Project details**

**P1) Project title**

FPM005 Food policy coherence in local government: who does what and why?

**P1.1) Short project title**

Food policy coherence in local government

**P2) Provide a lay summary of the background and aims of the research, including the research questions (max 400 words).**

The goal of this dissertation is to develop a framework for understanding how food policy gets put into practice by local authorities in the UK. While food policy is often made at the central government level, by ministers and departments representing the national interest, it is often interpreted and implemented (or not) by councils.

This dissertation builds on work by Kelly Parsons to map the food policymaking environment at the national government level in the UK. Parsons' identified 16 central government departments with collective responsibility for food policy, helping practitioners to understand the complexity of, and conflict within, the food policy environment (Parsons, 2021). This research therefore builds upon Parsons' work to uncover the role played by councils in food policy at the local level.

Having developed the framework, I will apply it to a local authority to understand the local food policy landscape. For now, I am assuming I will apply the framework to the London Borough of Lewisham, my home borough. I will then assess the coherence of that council's food policies to understand how they could be made more coherent or what the barriers to doing so might be.

Primary research question

- How is food policy interpreted and implemented in local authorities in the UK?

Secondary research questions



- What can policymakers do to increase the likelihood of success when proposing interventions delivered by local authorities?
- What are the main areas of food policy incoherence in UK local authorities, and how can these be resolved?

**P4) Provide a summary and brief explanation of the research design, method, and data analysis.**

Research methods

The main research method I will employ is interviews with experts on those local government functions set out in Appendix 1. I want to ask them about the food policy issues that their specialism may cover, and the role played by local authorities in developing, interpreting, responding to and implementing food policy interventions. Interviews are the most appropriate research method for this study (compared to, say, questionnaires) as they better allow for the exploratory nature of the topic. It would not be realistic to construct a questionnaire asking about policy links (which may be tangential, or unconsidered before being asked), nor would it allow the freedom to give prompts or to ask probing questions. Using interviews gives me an opportunity to develop questions 'on the fly' based on initial responses given by the interviewee. From experience, asking subject matter experts to share their knowledge and/or reflect on their professional experience can often be an enjoyable, validating and even cathartic experience, and one which I hope will elicit more considered, candid responses than would a questionnaire or similar method (Gray, 2022).

Finding interviewees

Based on my experience in local government (having worked in policy roles at the LGA and London Councils, the umbrella group for London's boroughs), I am aware that there are many representative bodies, panels and other thematic forums for each of the local authority functions listed, as well as policy officers and other experts who know more about food policy in the local government context. The main research method I will employ is therefore qualitative, semi-structured interviews with representatives of the local government functions identified, and/or with those bodies that most frequently interact with them. Examples of these are set out in Appendix 1.

For the avoidance of doubt, some interviewees may come from local authorities, but many will come from the representative bodies (such as the LGA and the various representatives of each function), which are typically national organisations. I will aim to use one local authority to explore the issues in the local context; I won't know which one(s) until I have begun the preliminary discussions, as I am hoping people from national organisations can introduce me to people in local authorities who are doing good work in this area.

My expectation is that some interviews will be very short (for example, the discussion on cremations and burials seems unlikely to yield many food policy overlaps, though I will maintain an open mind). This assumption is based on my experience to-date, and part of the reason for asking experts their views is to overcome my biases and avoid missing important links. I would aim to start with the LGA and Institute for Government, in the hope that they can validate my approach, confirm or add to the list of suitable representative bodies, and potentially help to make introductions.

Interview approach

I will undertake semi-structured interviews, with a combination of consistent introductory questions (describe your role, how does your specialism interact with food policy, etc), before allowing the

conversation to evolve based on the initial responses. As such, the interviews will be largely non-directive, albeit within the confines of food policy, because I am unlikely to know what direction the discussion will go in. Conducting desk research beforehand (such as by reviewing any policy documents the interviewee's organisation may have published) will enable me to keep the interviews reasonably focused, and may help to prompt or guide the conversation (Gray, 2022).

I aim to conduct the interviews online, using Microsoft Teams or similar. This is in part to make best use of my time and that of my interviewees by eliminating travel. It also enables me to record and transcribe each interview more easily.

#### Analysis

I will transcribe the interviews using the built-in transcription function in Microsoft Teams. I will then use NVivo to code and analyse the interviews.

#### **P4.1) If relevant, please upload your research protocol.**

#### **P5) What do you consider are the ethical issues associated with conducting this research and how do you propose to address them?**

Research ethics relates to the moral framework in which research is conducted, and involves taking steps to conduct research responsibly, properly and fairly (Gray, 2022). There is an ethical consideration for this research in that it involves human participants. Interviewees will be participating purely in a professional capacity, commenting mainly on facts, rather than feelings. As such, and because they are not from vulnerable groups (such as children or adults at risk), the research is deemed to be low risk, from an ethical perspective. However, it is possible that the discussion will uncover tensions and conflicts between functions or organisations, potentially surfacing some inflammatory or critical views. My goal will be to limit harm to the individual participant, which I will achieve by anonymising their responses and attributing them only to a function or organisation. I will also be clear upfront about the goals of the research and how participants' responses will be used in order to obtain their informed consent to participate (Lancaster, 2017; City, 2023).

In order to anonymise participants, I will use broad groupings to categorise respondents (probably 'representative bodies' and 'local authorities') which will be specific enough to draw meaningful conclusions without the possibility of jigsaw identification. I will ask participants' permission to list the name of their organisation in the acknowledgements section but without attributing data or quotes to specific organisations. I will review the acknowledgements to ensure there are sufficient organisations included to prevent jigsaw identification. I will also redact transcripts to avoid the possibility of including personal identifying information in direct quotes. Respondents' personal data will only be accessible by me and will not be shared.

#### **P6) Project start date**

The start date will be the date of approval.

#### **P7) Anticipated project end date**

31 Dec 2023

#### **P8) Where will the research take place?**

Online interviews with UK participants

**P10) Is this application or any part of this research project being submitted to another ethics committee, or has it previously been submitted to an ethics committee?**

No

## **Human participants: information and participation**

*The options for the following question are one or more of:*

*'Under 18'; 'Adults at risk'; 'Individuals aged 16 and over potentially without the capacity to consent';*

*'None of the above'.*

**H1) Will persons from any of the following groups be participating in the project?**

None of the above

**H2) How many participants will be recruited?**

45

**H3) Explain how the sample size has been determined.**

One representative from each of around 30 representative bodies (one for each local government function identified, e.g. trading standards, planning, environmental health etc), plus around 15 additional interviewees from other representative bodies (e.g. the Local Government Association, Institute for Governance).

**H4) What is the age group of the participants?**

**Lower Upper**

18

**H5) Please specify inclusion and exclusion criteria.**

Participants selected solely on basis of professional expertise and/or because they represent a professional body; they will be excluded if they do not meet these criteria. Professional expertise is likely to arise from individuals' roles; for example, the LGA is likely to have a policy lead on food issues, and their expertise will come from the meetings they attend, research they conduct, policy briefings they write and professional networks they are part of. Some may have specific qualifications in particular areas.

Potential sources of interviewees include:

National Museums Association; Chief Cultural and Leisure Officers Association; Arts Marketing Association

Local Authority Registration and Coroner Services Association

Local Authority Building Control; Association of Consultant Approved Inspectors

Federation of Burial and Cremation Authorities; Institute of Cemetery and Crematorium Management

Association of Directors of Children's Services

LGA Coastal Special Interest Group

LGA

Confederation of Passenger Transport; Rail Delivery Group

Consumer Protection Association; Citizens Advice

Chartered Institute of Public Finance and Accountancy  
Chief Economic Development Officers Society  
Department for Education; Local Authorities Caterers Association; The University Caterers Organisation  
Association of Electoral Administrators  
Emergency Planning Society  
Chartered Institute of Environmental Health; Association of Chief Environmental Health Officers  
Chartered Institution of Highways and Transportation; National Highways  
Association of Local Authority Chief Housing Officers; National Housing Federation  
Chartered Institute of Library and Information Professionals  
Institute of Licensing  
National Association of British Market Authorities; Local Authority Event Organisers' Group; Farm Retail Association  
National Museums Association; Chief Cultural and Leisure Officers Association  
British Parking Association  
Town and Country Planning Association; Royal Town Planning Institute; Planning Officers Society  
British Toilet Association  
The Kings Fund; The Health Foundation; Faculty of Public Health  
Association of Directors of Adult Social Care  
Sport and Recreation Alliance; Chartered institute for the Management of Sport and Physical Activity  
CleanUpUK; Keep Britain Tidy  
Chief Cultural and Leisure Officers Association; Visit Britain  
Chartered Trading Standards Institute; National Trading Standards; Association of Chief Trading Standards Officers  
Association of Transport Coordinating Officers; Transport Planning Society  
The Local Authority Recycling Advisory Committee; WRAP; National Association of Waste Disposal Officers  
This is not an exhaustive list, though I don't envisage interviewing a representative for every function.

**H6) What are the potential risks and burdens for research participants and how will you minimise them?**

I believe the risks to be very low, because they will be acting in their professional role and commenting on subjects that are largely in the public domain. However, it is possible that the discussion will uncover tensions and conflicts between functions or organisations, potentially surfacing some inflammatory or critical views. My goal will be to limit harm to the individual participant, which I will achieve by anonymising their responses and attributing them only to a function or organisation.

**H7) Will you specifically recruit pregnant women, women in labour, or women who have had a recent stillbirth or miscarriage (within the last 12 months)?**

No

**H8) Will you directly recruit any staff and/or students at City?**

None of the above

**H8.1) If you intend to contact staff/students directly for recruitment purpose, please upload a letter of approval from the respective School(s)/Department(s).**

**H9) How are participants to be identified, approached and recruited, and by whom?**

Based on my experience in local government (having worked in policy roles at the LGA and London Councils, the umbrella group for London's boroughs), I am aware that there are many representative bodies, panels and other thematic forums for each of the local authority functions listed, as well as policy officers and other experts who know more about food policy in the local government context. I have conducted desk research to identify target institutions. I will use a mixture of direct approaches, introductions from my professional network and referrals from other interviewees to contact and recruit participants.

I will ask interviewees to make an introduction to the person they propose to refer me to, ideally via email. I will treat the referred interviewees' personal data as described earlier (i.e. not shared, anonymised/redacted in the report).

**H10) Please upload your participant information sheets and consent form, or if they are online (e.g. on Qualtrics) paste the link below.**

**H11) If appropriate, please upload a copy of the advertisement, including recruitment emails, flyers or letter.**

**H12) Describe the procedure that will be used when seeking and obtaining consent, including when consent will be obtained.**

Participants will be selected based on their organisation and/or area of specialist knowledge and experience. They will be sent the consent form as part of the initial approach (i.e. together with the research flyer) so they know what is involved. Rob Kidd will obtain consent, using the consent form. Participants will be asked to digitally sign the form and return it to me. A signed copy will be sent to / retained by the participants. They will receive the participant information sheet at the first approach. Participants are likely to have several days, up to a few weeks, between receiving information and taking part in the interview.

**H13) Are there any pressures that may make it difficult for participants to refuse to take part in the project?**

No

**H14) Is any part of the research being conducted with participants outside the UK?**

No

**Human participants: method**

*The options for the following question are one or more of:*

*'Invasive procedures (for example medical or surgical)'; 'Intrusive procedures (for example*

*psychological or social); 'Potentially harmful procedures of any kind'; 'Drugs, placebos, or other substances administered to participants'; 'None of the above'.*

**M1) Will any of the following methods be involved in the project:**

None of the above

**M2) Does the project involve any deceptive research practices?**

No

**M3) Is there a possibility for over-research of participants?**

No

**M4) Please upload copies of any questionnaires, topic guides for interviews or focus groups, or equivalent research materials.**

**M5) Will participants be provided with the findings or outcomes of the project?**

Yes

**M5.1) Explain how this information will be provided.**

I will share a summary of my research with each participant via email once it has been completed.

**M6) If the research is intended to benefit the participants, third parties or the local community, please give details.**

The aim is for the research to help policymakers working in / with local government to more easily navigate and understand the various organisations in this space.

**M7) Are you offering any incentives for participating?**

No

**M8) Does the research involve clinical trial or clinical intervention testing that does not require Health Research Authority or MHRA approval?**

No

**M9) Will the project involve the collection of human tissue or other biological samples that does not fall under the Human Tissue Act (2004) that does not require Health Research Authority Research Ethics Service approval?**

No

**M10) Will the project involve potentially sensitive topics, such as participants' sexual behaviour, their legal or political behaviour, their experience of violence?**

No

**M11) Will the project involve activities that may lead to 'labelling' either by the researcher (e.g. categorisation) or by the participant (e.g. 'I'm stupid', 'I'm not normal')?**

No

## **Data**

**D1) Indicate which of the following you will be using to collect your data.**

Interviews

Audio/digital recording interviewees or events

**D2) How will the the privacy of the participants be protected?**

De-identified samples or data

**D3) Will the research involve use of direct quotes?**

Yes

**D5) Where/how do you intend to store your data?**

Password protected computer files

Storage on encrypted device (e.g. laptop, hard drive, USB)

**D6) Will personal data collected be shared with other organisations?**

No

**D7) Will the data be accessed by people other than the named researcher, supervisors or examiners?**

No

**D8) Is the data intended or required (e.g. by funding body) to be published for reuse or to be shared as part of longitudinal research or a different/wider research project now or in the future?**

No

**D10) How long are you intending to keep the research data generated by the study?**

Until graduation

**D11) How long will personal data be stored or accessed after the study has ended?**

Until graduation

**D12) How are you intending to destroy the personal data after this period?**

All data will be electronic. Deletion from local storage and raised via IT Helpdesk for deletion from City servers.

## **Health & safety**

**HS1) Are there any health and safety risks to the researchers over and above that of their normal working life?**

No

**HS3) Are there hazards associated with undertaking this project where a formal risk assessment would be required?**

## Appendix 3: Participant Information Sheet



# Research Participant Information Sheet

## About the study

REC reference number	Date	Version
<b>ETH2223-1982</b>	<b>18 April 2023</b>	<b>V0.1</b>
Title of study	<b>Food policy coherence in local government: who does what and why?</b>	
Principal researcher	<b>Rob Kidd</b>	

## Introduction

We would like to invite you to take part in a research study. Before you decide whether you would like to take part it is important that you understand why the research is being done and what it would involve for you. Please take time to read the following information carefully and discuss it with others if you wish. Ask us if there is anything that is not clear or if you would like more information. You will be given a copy of this information sheet to keep.

## Purpose of the study

The purpose of the study is to gain a better understanding of the stakeholders involved in making, interpreting and implementing food policy in local government in the UK. It seeks to map the actors involved, the links between them and the areas of incoherence that may exist.

This study is being conducted as part of dissertation research for a Masters in Food Policy at the Centre for Food Policy, City, University of London.

## Why have I been invited to take part?

You have been invited to take part because of your specialist knowledge on the topic, usually because of your role in a representative or coordinating body, and/or a local authority.

## Do I have to take part?

Participation in the project is voluntary, and you can choose not to participate in part or all of the project. You can withdraw at any point until the interview is transcribed, after which point it will not be possible to remove your contribution to the research. It is up to you to decide whether or not to take part. If you do decide to take part, you will be asked to sign a consent form. If you decide to take part, you are still free to withdraw at any time before the interview is transcribed and without giving a reason. Once the interview has been transcribed, it will not be possible to withdraw from the study, but your comments will be anonymised prior to publication.

## What will happen if I take part?

You will be asked to take part in a 1:1 online interview with the researcher. The interview should last no longer than one hour. During the interview, you will be asked to describe how the local government function that forms the subject of your discussion relates to food policy. For example:

- Does the function create food policy? What is the mandate for doing so?

- Is the function responsible for implementing food policy? Where is this policy set? What are the mechanisms for doing so? Is anyone involved in interpreting policy before its implementation?
- Are there ever times when other policies impede the successful implementation of food policy?
- Have you encountered any areas of policy coherence good practice?

The researcher will work with you to find a suitable time for the interview to take place. Interviews will take place over Microsoft Teams. They will be recorded and transcribed.

## What are the possible disadvantages and risks of taking part?

There are no risks to not taking part.

## What are the possible benefits of taking part?

We hope that the completed research will be of use to all participants and the organisations they represent, in helping them to navigate the complex network of actors involved in setting and implementing food policy in the UK.

## Expenses and Payments

For the avoidance of doubt, no payments or expenses will be paid for participation in the research.

## Funding

The project is self-funded by the researcher.

## Conflicts of interest

There are no conflicts of interest declared.

## How to take part

Participants will be invited to take part by email. Please confirm your willingness to participate by email.

## Data privacy statement

City, University of London is the sponsor and the data controller of this study based in the United Kingdom. This means that we are responsible for looking after your information and using it properly. The legal basis under which your data will be processed is City's public task.

Your right to access, change or move your information are limited, as we need to manage your information in a specific way in order for the research to be reliable and accurate. To safeguard your rights, we will use the minimum personal-identifiable information possible (for further information please see <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/public-task/>).

City will use your name and contact details to contact you about the research study as necessary. If you wish to receive the results of the study, your contact details will also be kept for this purpose. The only people at City who will have access to your identifiable information will be the lead researcher, Rob Kidd. City will keep identifiable information about you from this study for one year after the study has finished.

You can find out more about how City handles data by visiting <https://www.city.ac.uk/about/governance/legal>. If you are concerned about how we have processed your personal data, you can contact the Information Commissioner's Office (IOC) <https://ico.org.uk/>.

## What will happen to the results?

The research will be used to inform a masters dissertation. It may be published in whole or in part to promote the findings of the study and inform future research. Participants will receive a copy of the published research, if they would like it.

## Who has reviewed the study?

This study has been approved by the School of Health and Psychological Sciences Food Policy Proportionate Review Committee, City, University of London.

## What if there is a problem?

If you have any problems, concerns or questions about this study, you should ask to speak to a member of the research team. If you remain unhappy and wish to complain formally, you can do this through City's complaints procedure. To complain about the study, you need to phone 020 7040 3040. You can then ask to speak to the Secretary to Senate Research Ethics Committee and inform them that the name of the project is **Food policy coherence in local government**.

You can also write to the Secretary at:

Annah Whyton  
Research & Enterprise Office  
City, University of London  
Northampton Square  
London, EC1V 0HB  
Email: [senaterec@city.ac.uk](mailto:senaterec@city.ac.uk)

## Insurance

City University London holds insurance policies which apply to this study, subject to the terms and conditions of the policy. If you feel you have been harmed or injured by taking part in this study you may be eligible to claim compensation. This does not affect your legal rights to seek compensation. If you are harmed due to someone's negligence, then you may have grounds for legal action.

## Further information and contact details

For more information about this study, or to volunteer, please contact:

**Rob Kidd** [rob.kidd@city.ac.uk](mailto:rob.kidd@city.ac.uk)

The research is supervised by Christian Reynolds ([Christian.Reynolds@city.ac.uk](mailto:Christian.Reynolds@city.ac.uk)) and Rebecca Wells ([Rebecca.Wells.1@city.ac.uk](mailto:Rebecca.Wells.1@city.ac.uk)).

Thank you for taking the time to read this information sheet.

## Appendix 4: Recruitment Flyer



## Centre for Food Policy City, University of London

### **PARTICIPANTS NEEDED FOR RESEARCH IN LOCAL GOVERNMENT FOOD POLICY**

We are looking for volunteers to take part in a study of food policy coherence in UK local government.

As a participant in this study, you would be asked to share your professional knowledge, experience and recommendations on who makes, interprets and implements food policy in UK local authorities.

Your participation would involve one interview, lasting up to one hour.

In appreciation for your time, you will receive a summary of the research.

For more information about this study, or to volunteer, please contact:

**Rob Kidd** [rob.kidd@city.ac.uk](mailto:rob.kidd@city.ac.uk)

The research is supervised by Christian Reynolds ([Christian.Reynolds@city.ac.uk](mailto:Christian.Reynolds@city.ac.uk)) and Rebecca Wells ([Rebecca.Wells.1@city.ac.uk](mailto:Rebecca.Wells.1@city.ac.uk)).

This study has been reviewed by, and received ethics clearance through the School of Health & Psychological Sciences Research Ethics Committee, City, University of London.

*If you would like to complain about any aspect of the study, please contact Annah Whyton, Secretary to the Senate Research Ethics Committee at [senaterec@city.ac.uk](mailto:senaterec@city.ac.uk).*

*City, University of London is the data controller for the personal data collected for this research project. If you have any data protection concerns about this research project, please contact City's Information Compliance Team at [dataprotection@city.ac.uk](mailto:dataprotection@city.ac.uk).*

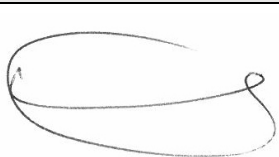
## Appendix 5: Consent Form Template

Name of principal investigator/researcher: **Rob Kidd**

REC reference number: **ETH2223-1982**

Title of study: **Food policy coherence in local government: who does what and why?**

		✓
1.	I confirm that I have read and understood the participant information v0.1 for the above study. I have had the opportunity to consider the information and ask questions which have been answered satisfactorily.	
2.	I understand that my participation is voluntary and that I am free to withdraw without giving a reason without being penalised or disadvantaged.	
3.	I understand that I will be able to withdraw my data up to the time of transcription.	
4.	I agree to the interview being video recorded and transcribed.	
5.	I agree to City recording and processing this information about me. I understand that this information will be used only for the purpose(s) explained in the participant information and my consent is conditional on City complying with its duties and obligations under the General Data Protection Regulation (GDPR).	
6.	I would like to be informed of the results of this study once it has been completed and understand that my contact details will be retained for this purpose.	
7.	I agree to the use of direct but anonymised quotes (I understand my words may be reproduced in the report, but that they will not be attributed to me).	
8.	I agree to take part in the above study.	

Name of researcher	Signature	Date
Rob Kidd		18 April 2023
Name of participant	Signature	Date

When completed, 1 copy for participant; 1 copy for researcher file.

## Appendix 6: Cold Email Template to Representative Organisations



**Subject:** Food Policy dissertation research

**Date:** Sunday, 11 June 2023 at 11:39:24 British Summer Time

**From:** PG-Kidd, Rob

Dear XXX,

I'm studying for an MSc in Food Policy at City, University of London, and am working on my dissertation. The title is *Food Policy Coherence in Local Government: Who Does What and Why?* The goal is to research the stakeholders and relationships in local government food policy, by interviewing representatives of local authorities and related organisations (like yours).

I'm approaching a range of representative organisations that cover the various functions of local government, to find out where the links are with food policy. I'm particularly interested in the functions that sometimes overlap or conflict, such as the tension between planning, economic development and public health in the siting of fast-food restaurants near schools (to name but one example).

Please could you let me know whether your organisation has any involvement in making, interpreting or implementing policy in relation to food? It may be that you have little or no interest in food policy, in which case, that would be really helpful to know so that I can narrow down my research. However, if your organisation or its members *do* have an interest in food policy (even if a tangential link) I would be so grateful if you could let me know.

I will be conducting interviews with some stakeholders to explore the links in more detail, but for now it would be helpful to get your steer on what (if any) links you have with food policy.

Don't hesitate to get in touch if you have any questions or would like to discuss it in more detail.

Best wishes,

**Rob Kidd**

Student, MSc Food Policy

City, University of London

[LinkedIn](#)

## Appendix 7: Interview Questions Template

# Interview questions

Interviewer	Rob Kidd
Interviewee	
Organisation	
Date	
Time	

<p>Please describe your role; <b>in what capacity does your role relate to food policy</b> in the local government context?</p>
<p>Which <b>local government functions</b> have responsibility for developing, interpreting and/or implementing food policy? For example: planning, waste, economic development, social care, tourism and so on.</p>
<p>What kinds of <b>food policy issues</b> are these local government functions engaged in? For example: public health / obesity; food fraud / adulteration; food security and resilience; food tourism.</p>
<p>What other stakeholders are involved in making, interpreting or implementing food policy in relation to the functions you described above?</p>
<p>Have you come across any <b>areas of good practice</b> where the local government functions described have worked in a particularly successful, innovative or noteworthy way?</p>
<p>Have you identified any areas where local government functions have <b>struggled to implement</b>, or themselves impeded the implementation, of food policy interventions?</p>
<p><i>Interviewee specific question – refer to any known research, existing work or other relevant issues for this interviewee.</i></p>

## Appendix 8: Summary of research coding and frequency of responses

### Interviewees mentioning the devolved nations of the UK

<b>Devolved nations</b>	<b>Count of interviewees</b>
Northern Ireland	4
Scotland	6
Wales	7

### Interviewees mentioning different local government functions

<b>Function</b>	<b>Count of interviewees</b>
Public health	23
Economic development	20
Planning	20
Environmental health	17
Education and skills	16
Sustainability, climate change	16
Waste collection and recycling	13
Trading standards	12
Waste disposal	10
Highways and roads	8
Social care	8
Sports centres and parks	7
Children's services	6
Housing	6
Licensing	6
Tourism	6
Transport	5
Arts and recreation	4
Markets and fairs	4
Council tax and business rates	3
Libraries	3
Births, marriages, deaths	2
Emergency planning	1
Museums and galleries	1

## Interviewees mentioning various food policy issues

<b>Food policy issues</b>	<b>Count of interviewees</b>
Sustainability, ethics, climate change, food waste	23
Healthy eating, nutrition	20
National Food Strategy, national government	20
Poverty, equality, food insecurity	20
Growing, production, allotments	19
Catering, procurement	18
Early years, school food, Healthy Start	17
Obesogenic food environments	17
Legislation, regulation, powers	15
Covid response	12
Food banks, emergency food aid	12
Food security, resilience	12
Obesity	10
Free school meals	9
Education	8
HFSS marketing	8
Food safety, hygiene, adulteration	7
Out-of-home advertising	7
Labelling	5
Allergens	4
Innovation, NPD	3

## Stakeholder groups

<b>Stakeholders</b>	<b>Count of interviewees</b>
Private sector	25
Voluntary sector	21
Local healthcare	14
Academia	10
Defra	8
Dept of Health and Social Care	6
Food Standards Agency	6
CTSI, NTS	4
Department for Education	2

## Success factors

<b>Success factors</b>	<b>Count of interviewees</b>
Capacity, resources, funding	26
Political leadership, cross-council support	22
Priority	22
Localism, devolution	18
Partnerships	18
Named champion	16
Systems thinking	16
Coalition of support, stakeholder engagement	15
Personalities	12
Relationships	9
Good food culture	8
Long-term thinking	8
Cocreation	6
Luck, coincidence	4
Timing, window of opportunity	2