

## Reprioritisation Update – overall priorities and impact on corporate plan deliverables

### 1 Purpose of the paper

- 1.1 In Autumn 2021, post EU Exit, FSS published its first Strategic Workforce Plan 2022-26 which took full account of the implications relating to EU Exit and the significant impact on UK and Scotland's food and feed industries and the transformative effect on the way that the food chain was to be regulated.
- 1.2 The need for new trading arrangements, and the transfer of functions currently undertaken by the EU Commission to Westminster and the devolved UK Governments required the development of new reporting structures and additional resource.
- 1.3 This led to a business case submitted to Scottish Government (SG) for an additional 56 posts and £2.8m for 2022/23 rising to £3.1m in 2024/25. This was subsequently rejected early 2022 with no additional monies forthcoming
- 1.4 As a consequence of the financial gap the FSS CEO instigated a prioritisation exercise.
- 1.5 The 2022 prioritisation exercise resulted in a list of FSS activities proposed as stopped, paused, continued with an exit strategy or scaled appropriately (as articulated in the 07 December 2022 FSS Board paper).
- 1.6 This paper brings details of those Year 2 (Y2) and planned Year 3 (Y3) Corporate Plan deliverables that have been recommended as stopped, paused or scaled back as a result of the prioritisation exercise.
- 1.7 The FSS Board is asked to:
  - **Note** those Y2 and Y3 priority deliverables that have been proposed as stopped, paused or scaled back as a consequence of the 2022 prioritisation exercise.
  - **Note** the next steps recommendations noted in **para 8**.

## 2 Strategic aims

2.1 This work supports all of the FSS Strategic outcomes.

## 3 Background

3.1 As FSS Board members may be aware, prioritisation was assessed against a set of FSS organisation descriptors, principles and associated weightings [**Annex A**]. The resulting scores alone did not determine priorities and a number of other factors were taken into consideration. These include interdependencies with other functions, statutory and contractual requirements, whether the function is an organisational enabler, produces an efficiency or seeks to address a FSS strategic risk.

3.2 The prioritisation exercise resulted in a list of FSS activities proposed as stopped, paused, continued with an exit strategy or scaled appropriately. The exercise also agreed seven priority areas, as noted in **para. 3.3**, underpinned by a resilient and innovative Corporate Services support function. Heads of Division were requested to undertake a SWOT analysis on these priorities and these were presented to the 08 February 2023 FSS Board Seminar.

3.3 Seven priority areas:

- The Regulatory Strategy & Scottish Authorities Food Enforcement Rebuild (SAFER) programme
- Food crime and incidents
- Data and digital transformation
- Official Controls (OC) for food and feed
- Scottish Veterinary Service (SVS)
- Retained European Union law (REUL)
- Diet and nutrition

3.4 FSS also continues to work with other SG delivery bodies on potential rationalisation of support services and considering other options around support services.

## 4 Discussion: Organisational Reconfiguration

4.1 In light of the seven priority areas (**para. 3.3**), FSS undertook a review of the current organisational structure. This resulted in a reconfigured organisation, as of 01 February 2023, which will be in place for an initial period of six months. The reconfiguration is driven by organisational need and the intention is to drive efficiency and effectiveness to deliver on our agreed priorities whilst presenting

development opportunities across FSS. In addition, it will create capacity and increase diversity of expertise at a senior level which will improve organisational resilience and strategic focus both internally and externally.

- 4.2 The six month duration is essential given that the impacts of various external factors, i.e. REUL and SVS, are still very uncertain. At time of writing the REUL Bill receives Royal Assent in April / May 2023 and Ministers are currently scheduled to consider SVS in May 2023.
- 4.3 These changes will create the initial capacity at a senior level to allow a full review of the impact of the prioritisation work, and consideration of the implications of decisions made to stop/pause/scale back work, with a view to looking to develop a more sustainable structure/ways of working. The main points to note in the reconfiguration are:
- The introduction of two new TRS C3 posts (Director of Policy and Science and Director of Corporate Services).
  - A new C2 post created within Diet and Nutrition (initially on TRS)
  - A new C1 post (Head of Digital) created within the Corporate Services Directorate.
  - Ian McWatt's directorate will now encompass SFCIU, Audit Assurance and LA Delivery and SAFER (including Regulatory Strategy)
  - Julie Hesketh-Laird's Directorate will now encompass Operational Delivery and Diet and Nutrition.

## 5 Discussion: Prioritisation Update

- 5.1 An exercise took place to determine the impact of the prioritisation exercise on the FSS three year corporate plan, and five year strategy, through identifying those remaining Y2, and proposed Y3, deliverables that are now recommended as stopped, paused or scaled back. The exercise also captured the impact on FSS resources.
- 5.2 As this paper is detailing the impact of the prioritisation process on the delivery of the Corporate Plan, Heads of Division were requested to assign a Red Amber Green (RAG) status (**para. 5.3**) on those items proposed as stopped, paused or scaled back. It should be noted the RAG status reflects impact on Corporate Plan delivery only and not, for example, the impact on FSS being unable to fulfil statutory obligations as not all the work that FSS undertakes is captured in the Corporate Plan or seven priorities.

### 5.3 Red Amber Green (RAG) descriptors:

- **R:** item being stopped / paused / scaled back has a **significant negative impact** on the successful delivery of the FSS Corporate Plan and ultimately the 5 year strategy
- **A:** item being stopped / paused / scaled back has a **some negative impact** on the successful delivery of the FSS Corporate Plan and ultimately the 5 year strategy
- **G:** item being stopped / paused / scaled back has a **no/minimal impact** on the successful delivery of the FSS Corporate Plan and ultimately the 5 year strategy

### 5.4 The result of this exercise is presented in this paper, and in Annexes, which detail:

- **Annex B:** The remaining Y2 priority deliverables, and the planned Y3 priority deliverables, that are now, as a result of the prioritisation exercise, proposed as stopped, paused or scaled back.

### 5.5 As part of the exercise those 2022/23 items that did not go through the prioritisation exercise (as they were deemed BAU or did not meet the criteria of being a specific time-bound deliverable) were revisited to identify whether they could, in light of the prioritisation results, be paused, stopped or scaled back. The results of this exercise are noted in **Annex C**.

### 5.6 When reviewing the paper, and the annexes, it should be noted that:

- The exercise did not take account of business as usual activities for 2023/24. It is considered appropriate that a similar exercise be undertaken at Divisional / Branch level when we develop our 2023/24 Business Plans.
- This does not include impacts on resources determined by the actual prioritisation exercise results.
- The information collated may need to be reviewed in light of the reconfigured organisational structure as it beds in.

## 6 Identification of risks and issues

### 6.1 Although the impacts of stopping, pausing and scaling back priority deliverables, and other activities, are noted in Annexes B, C and D, further work is recommended to fully articulate the unintended consequences of the decisions taken.

## 7 Equality Impact Assessment and Fairer Scotland Duty

### 7.1 Completion of an Equality Impact Assessment and Fairer Scotland Duty Assessment are not required for this paper.

## 8 Next steps

- 8.1 Once the FSS Board note the work being proposed as stopped, paused or scaled back, and agree the Y3 deliverables, it is intended to progress forward with the following key activities:
- 8.1.1 assess and identify structure and resources required for Divisions to successfully deliver the priority areas (**para 3.3**), alongside BAU and Corporate Plan activities.
  - 8.1.2 determine the profile of the Corporate Services Directorate, and resources required, to support FSS and the Divisions in delivery of the priority areas.
  - 8.1.3 determine potential efficiencies available when Divisions and Branches develop their 2023/24 Business Plans in order to build on the prioritisation work undertaken.

## 9 Conclusion

- 9.1 This paper articulates the impact of the prioritisation exercise on the Corporate Plan and priority deliverables (alongside an opportunity to review those items that did not go through the prioritisation exercise).
- 9.2 As stated earlier in this report, the workforce plan recognised that an additional 56 staff posts were required to successfully deliver the remaining Y2 and Y3 priority deliverables, as well as further EU consequential work. As a result of the prioritisation exercise we have identified a number of priority deliverables which can be stopped, scaled back or paused which in real terms translates to 29 FTE posts. It does however have to recognised that due to financial challenges a number of these posts were never recruited or have been gapped for many months or redeployed to other priority business activities.

	FTEs	Financial Impact
Resources required as of 01/04/22 and beyond to deliver the EU consequential and Corporate Plan (as identified in the Workforce plan)	56	£3.1 Million
Resources no longer required as of 01/04/23 to deliver the Corporate Plan (as identified through prioritisation)	29	£1.5 Million

- 9.3 Work is now ongoing with HR to agree a suitable process and timeline which meets business demand and the needs of our staff.
- 9.4 The FSS Board is asked to:

- **Note** those Y2 and Y3 priority deliverables that have been proposed as stopped, paused or scaled back as a consequence of the 2022 prioritisation exercise.
- **Note** the next steps recommendations noted in **para 8**.

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## Annex A

**Organisational Descriptors and weightings** (of which a maximum of 3 could be chosen when mapping functions against these)

	<b>Organisational descriptor</b>	<b>Weight</b>
<b>1</b>	Regulator	25
<b>2</b>	Science/evidence gatherer	20
<b>3</b>	Government advisor	18
<b>4</b>	Policy developer	15
<b>5</b>	Stakeholder influencer	12
<b>6</b>	Consumer influencer	5
<b>7</b>	Trade assurer	5

**Principles and weightings** (no maximum)

	<b>Principle</b>	<b>Weight</b>
<b>A</b>	Our efforts will be focused on activities with greatest impact on safety & standards to protect consumers in Scotland	38
<b>B</b>	We will prioritise investment to deliver increased effectiveness & efficiency	20
<b>C</b>	We will meet statutory requirements following an assessment of the minimum standards that achieve that outcome	15
<b>D</b>	*We will undertake new in year activities only if they can be shown to be more important than existing plans	15
<b>E</b>	We will consider decisions through the lens of reputational risk to & influence of FSS	12

\* was parked as a process question rather than applicable now



Annex B: Outstanding Y2 & Proposed Y3 Priority Deliverables proposed as stopped, paused, scaled back

Goal	SO	Division	Year	Priority Deliverable	Status	RAG Status Reasoning (where Red or Amber)
1	1	Audit Assurance	2	<b>Audit Assurance</b> Deliver a risk-based programme of audit focussed on the dissemination of best practice and continuous improvement covering the delivery of Official Controls by local authorities and FSS.	scale back	<b>RED RAG:</b> These are statutory functions and part of GOAL 1.
3	1, 3, 4, 5	Science	2	<b>Laboratory Capacity and Capability</b> Review national capacity and capability for statutory food and feed testing and surveillance in Scotland, and develop a proposal for safeguarding laboratory provision of these services into the future.	pause	<b>RED RAG:</b> The sustainability of PA labs in Scotland continues to be a significant risk for FSS.
6	5	C&M	2	<b>Education and community</b> Delivery of a refreshed communications, marketing and engagement strategy for reaching young people and the education sector.	Pause	<b>RED RAG:</b> Increased talk internally and within political circles (HSC&S committee recently) that educating and influencing the younger generation is the most effective way to shift behaviours and positively influence future obesity levels in Scotland. That said, it has been done at a micro level in the past and in order to properly influence we need to step back and develop a alongside a comms plan that will require significant budget/resource to deliver. Currently the school resources/tools on the FSS website contribute significantly to the high traffic volumes the site sees. Dropping these may result in loss of engagement from a currently active audience of teachers. We also have a teacher's Facebook page that we will need to phase out and if the REHIS funding is not available in future years it poses a risk to our relationship with them.
1	1	Audit Assurance	2	<b>Imports – International Assurance:</b> Input into the new UK strategy for providing assurance over the safety and standards of food and feed imported into Scotland; working with Scottish Government, the FSA and DEFRA to ensure the appropriate SPS checks are carried out prior to approval of new imports.	Scale back	<b>AMBER RAG:</b> Although not referenced in the strategic plan, imports are clearly referred to in the Corporate Plan (ensure products imported from other countries are safe and meet the high standards expected by Scottish consumers), and this is part of the wider imports work.
4	4	LA Delivery	2	<b>Allergens</b> Establish a project, in partnership with LA's & Academics in the University of Glasgow, to look at anaphylaxis and it's reporting in the education setting.	scale back	<b>AMBER RAG:</b> This has an impact on our ability to identify more effectively adverse effects to allergens in the general population and link this to food business establishments
4	4	LA Delivery	2	<b>Allergens</b> Promote, in partnership with FSA, the UK Anaphylaxis Registry In Scotland.	scale back	<b>AMBER RAG:</b> Promotion of this register would provide a valuable source of information that could be used to tailor guidance to industry and consumer messaging. In effect scaling this back means that there will be limited value to the work. The FSA have also scaled back their work in this area - therefore minimised the risk that Scotland may get left behind or pressured into delivering some work in this area. Also not without reputational risk given allergens is the biggest issue when it comes to recalls.
5	5	UK&IR	2	<b>Partnerships</b> Create opportunities to develop international partnerships, identifying common ambitions and scope for collaboration.	pause	<b>AMBER RAG:</b> May have some impact on ambitions under goal 5 of CP to develop impactful relationships internationally (Goal 5, activity 4).
5	5	UK&IR	2	<b>Engagement</b> Complete a programme of engagement with international food regulators to identify common interests and scope for collaboration.	pause	<b>AMBER RAG:</b> May have some impact on ambitions under goal 5 of CP to develop impactful relationships internationally (Goal 5, activity 4).
5	5	UK&IR	2	<b>Engagement</b> Develop a framework which supports teams to prioritise stakeholder engagement at domestic, EU and wider international levels. Provide practical tools to help staff evaluate engagement opportunities and share information and knowledge arising from connections.	pause	<b>AMBER RAG:</b> May have some impact on ambitions under goal 5 of CP to develop impactful relationships internationally (Goal 5, activity 4).
6	2, 4, 5	NSP	2	<b>Campaigns</b> Develop a follow up healthy eating campaign highlighting developments with the dietary guidance tool	Stop	<b>AMBER RAG:</b> Risks a decrease in our visibility with respect to consumer facing advice on healthy eating.
MOE	All	G&I	2	C/F Financial Management Plan 2022 - 26.	pause	<b>AMBER RAG:</b> FMP outlines the longer term budget position for FSS and supports the delivery of the CP and strategy
4	4	Science / Reg. Policy	2	<b>Labelling Sustainability</b> Deliver a new campaign with ZWS to raise awareness of the role of food labelling in food safety and waste prevention.	pause	<b>AMBER/GREEN RAG:</b> Does not impact on essential BAU/statutory work but will impact on commitments in our strategy with respect to sustainability.
1	5	UK&IR	2	<b>UK Frameworks</b> Implement the common frameworks where agreed by Ministers and facilitate effective partnership working to ensure these agreements are clearly understood and applied.	scale back	
5	5	UK&IR / Reg. Policy	2	<b>Partnerships</b> Review and refresh relevant agreements/MOUs/SLAs with strategic partners, ensuring they are fit for purpose in the post-EU exit landscape.	pause	
1	1	Reg. Policy	3	<b>Regulated Products</b> Engage and work with the FSA to understand the impact on any reviews of changes to the various regulated products frameworks to ensure they can work effectively on a three and four country basis now and in the future.	scale back	<b>AMBER/RED RAG:</b> if FSS is not involved (and do not currently have resource) then it will be driven by FSA and likely end up in a position where we have divergent approached or SM's are being asked to decide on changes based on FSA policy development / advice.



Goal	SO	Division	Year	Priority Deliverable	Status	RAG Status Reasoning (where Red or Amber)
3	2,4,5	NSP	3	<b>Nutrition Advice</b> Develop Eat Well Your Way stakeholder dissemination and engagement plan	pause	<b>AMBER RAG:</b> Risks to consumers in terms of a lack of advice around healthy eating. However, a scaled back approach to stakeholder engagement can be taken forward with health professionals and their networks.
3	2,4,5	NSP	3	<b>Nutrition Advice</b> Update Eat well your way with links to affordability	pause	<b>AMBER RAG:</b> Stakeholders will likely see this as a priority given the cost of living crisis, however some work can be done in house to mitigate the impact of stopping this work entirely.
3	2,4,5	NSP	3	<b>Nutrition Campaign</b> Develop Healthy Eating campaign linking to Eat Well Your Way	stop	<b>AMBER RAG:</b> Risks a decrease in our visibility with respect to consumer facing advice. However, existing assets can be reused and promoted organically.
3	2,4,5	NSP	3	<b>Nutrition Campaign</b> Vitamin D campaign	stop	<b>AMBER RAG:</b> Risks a decrease in our visibility with respect to consumer facing advice. However, existing assets can be reused and promoted organically.
5	5	C&M	3	<b>Marketing</b> D&N consumer follow up campaign	stop	<b>AMBER RAG:</b> The investment of development of the initial healthy eating campaign was intended to have longevity but not doing a follow up means that is lost. However, given current circumstances in relation to the rising cost of living it is deemed inappropriate to rerun this campaign, regardless of any budgetary constraints. The loss of any campaign activity reduces FSS share of voice and may negatively impact awareness levels with key audiences.
5	5	C&M	3	<b>Sustainability</b> Development and promotion of the sustainability strategy	Pause	<b>AMBER RAG:</b> Pausing this stream of activity means that there will be no monitoring, development or further promotion of the existing sustainability strategy. There is an expectation from SG that we take sustainability seriously but without resource to drive it this will be difficult.
6	5	C&M	3	<b>Events</b> Royal Highland Show	stop	<b>AMBER RAG:</b> FSS will still have a presence, it simply won't be as big or as costly. The focus will be on business engagement rather than consumer facing messages. The risk posed is again one of reduced awareness levels with the consumer audience.
5	5	C&M	3	<b>Marketing</b> Vitamin D campaign	stop	<b>AMBER RAG:</b> We can continue to promote the vitamin D messages without budget simply by using organic channels such as social media, blogs and press. The creative assets exist, have been translated and the messages are unlikely to change so, whilst this is a 'stop' it is more specifically in regards to big media spend and not the stopping of messages overall. Obviously this carries a caveat that effectiveness will be impacted negatively as our audience reach will be reduced significantly, in addition the loss of any external media campaigns may negatively impact awareness levels of FSS with key audiences.
2	1,3,5	Op. Delivery	3	<b>Official Controls:</b> Delivery of Export Health Certificates in Fish Export Hubs	scale back	<b>AMBER RAG:</b> Reputational risks to FSS in terms of expectations of Seafood Industry and Ministers with regards to Trade, in particular for Salmon, which is the largest Scottish export. Also potential for significant impact on Local Authority delivery if the Hubs model is removed in its entirety and provision of EHCs is not undertaken by a private COs and the responsibility falls back to LAs.
3	4	Science	3	<b>Social Research</b> Disseminate findings of consumer research on attitudes relating to New Breeding Techniques in food production	scale back	
3	4	Science	3	<b>Social Research</b> Disseminate findings of social research relating to allergens (a) the impacts of allergen labelling in foods which are pre-packed for direct sale (PPDS) in Scotland for FBOs and LAs, (b) impacts of allergen labelling in foods which are PPDS in Scotland for consumers with allergens, and (c) social research with consumers with allergens	scale back	
3	1, 2, 3, 4, 5	Science	3	<b>Social Research</b> Finalise a social research plan for FSS linked to themes in FSS's FHRP and key evidence needs to support the delivery of risk analysis, SAFER/ regulatory strategy and communications activities across the organisation	scale back	
1	1, 5	SFCIU	3	<b>Food Crime</b> Implement the food crime prevention strategy, in relation to food and feed crime through analysis, education and a partnership working structure.	scale back	

### ANNEX C: Assessment of those items that did not go through the prioritisation process

Division	FUNCTION / TASK	Status	RAG Status Reasoning (where Red or Amber)
UK&IR	Monitoring and coordination of FSS international activity	pause	<b>AMBER RAG:</b> May have some impact on ambitions under goal 5 of CP to develop impactful relationships internationally (Goal 5, activity 4).
UK&IR	Identification of international conference opportunities	pause	<b>AMBER RAG:</b> May have some impact on ambitions under goal 5 of CP to develop impactful relationships internationally (Goal 5, activity 4).
UK&IR	Seeking opportunities for international regulatory cooperation with food safety authorities in 3rd countries.	pause	<b>AMBER RAG:</b> May have some impact on ambitions under goal 5 of CP to develop impactful relationships internationally (Goal 5, activity 4).
C&M	University Fresher's Fairs (Nice to have)	stop	<b>AMBER RAG:</b> Reduced awareness levels with a key audience. Loss of momentum with previously developed campaigns and activity to ensure safety in the kitchen.
Op Delivery Feed	Conduct formal actions, investigate feed incidents, complaints and breaches across Scotland	scale back	<b>AMBER RAG:</b> This is a statutory function which as Competent Authority for Feed we are directly responsible for. In Scaling back we risk serious incidents occurring.
Op Delivery Feed	Manage Earned recognition schemes related to Feed and coordinate with FSA, VMD and Industry	scale back	<b>AMBER RAG:</b> Statutory Function in priority area. Embedding ER schemes in the feed delivery model has the potential to reduce our burden of inspection and affect the goodwill of industry and their professional bodies who are very keen to work with us in ensuring that intervention is targeted and effective and eliminates as far as possible any burden associated with dual inspection.
LA Delivery	Lead and/or attend relevant cross office working groups	scale back	<b>AMBER RAG:</b> This has an impact on some cross office groups being able to effectively function. These groups need to have a representative from the Division and where this is not possible outputs are unlikely to be delivered.
LA Delivery	Food and Feed Enforcement support relating to all aspects of the framework/MOU	scale back	<b>AMBER RAG:</b> This may impact upon the accuracy of the framework which will lack input from an enforcement perspective.
LA Delivery	Updating, writing content and ensuring website and other messaging routes are up to date, clear, concise and effective	stop	<b>AMBER RAG:</b> Outdated and inaccurate advice and guidance on our website risks businesses and consumers being misinformed or going to FSA as an alternative source of information. It affects the trust that Industry and consumers have in FSS.
LA Delivery	Provide support, input to and lead relevant pieces of work for the Regulatory Strategy	stop	
LA Delivery	Management of Scottish National database	scale back	
LA Delivery	Lead enforcement response to Import and Export efforts and projects of work	scale back	
LA Delivery	Management of Food Hygiene Information Scheme and Eatsafe	scale back	
UK&IR	Provide guidance & support through frameworks & RA processes to embed 4C/EU alignment considerations	scale back	
UK&IR	Engagement – supporting teams in FSS to engage more productively with stakeholders	pause	
UK&IR	Ongoing monitoring of EU exit related issues via EUXSG	stop	
UK&IR	Supporting FSS to participate in international food forums (e.g. IHFAF)	pause	
C&M	Healthy Eating Roadshow (Nice to have)	pause	
C&M	Sustainability/COP follow up conference (Nice to have)	stop	
C&M	Scottish Learning Festival (Nice to have)	stop	
C&M	Careers events (allowed for prior to the current situation and no longer relevant) (Nice to have)	stop	
G&I	HR: Organisational development /transformation programme - HR Change Manager, lead organisational design, agile working, restructure	pause	
Op Delivery Feed	Manage DSLA arrangements with relevant LAs	scale back	
Op Delivery Feed	Input into assessment and approval of BCP engaged in import of high risk feed not of animal origin	stop	
Op Delivery Feed	Conduct Import control checks at BCP not covered by DSLA who import high risk feed not of animal origin	stop	<b>RAG STATUS N/A</b> There are no checks as yet until TOM is ready for application
Reg. Policy	Review of Food Scotland 2015 Act	pause	<b>RAG STATUS N/A</b>
Reg. Policy	Supporting cross office working groups such as allergens, enforcement portal, SND, RSP, feed, shellfish, horizon scanning	TBC	<b>RAG STATUS N/A</b>
Reg. Policy	Joint Annual Report production	scale back	<b>RAG STATUS N/A</b>