

Food Standards Scotland

For safe food and healthy eating

Strategic Risk Register: Q2 2022/23



Background



The Strategic Risk Register is designed to reflect threats posed to the delivery of the Strategy (which the strategy itself identifies) and the most important risks to FSS are those which may affect the delivery of the strategic objectives and key goals. ELT are responsible for identifying the Strategic Risks linked to the risk areas identified within the strategy ([FSS Strategy 2021-2026](#)).

This approach aims to lay out a clear and direct line between the risks identified in the strategy and each of the goals and strategic objectives. There is a cross link with business planning and progress to help inform the management off the risks. In other words, the mitigations and management of the risks in the strategy is through successful delivery of the corporate plan.

The FSS Strategic Risk Register exists to ensure that:

- Strategic risks are identified and assessed.
- The effectiveness of existing controls is evaluated.
- Residual risk is assessed.
- Risk treatment options are considered.
- Actions are determined and prioritised and action plans are implemented.
- The Strategic Risk Register supports the FSS Strategic Plan.

The FSS Risk Management Policy and Framework has been agreed as of Mar-22.

The Strategic Risk Register has been updated to include Integrated Assurance using the Three Lines of Defence Model. This helps to align and optimise FSS assurance with the management of risk and core business activities in line with the risk appetite, and exists to support The ARC and The Board's risk oversight. This approach is designed to replace the previous separate Assurance Mapping Exercise carried out by Branch Heads twice yearly.

Risk Score Guidance Keys

Likelihood Criteria

5 - Very High	>75% chance of occurring - almost certain to occur.
4 – High	51-75% chance of occurring - more likely to occur than not.
3 – Medium	26 - 50% chance of occurring - fairly likely to occur.
2 – Low	6 - 25% chance of occurring - unlikely to occur.
1 - Rare	1 - 5% chance of occurring - extremely unlikely to occur.

Risk Proximity

Imminent	IMM	Immediate threat of risk within the next month
Close	CLS	Threat of risk within the next 3 months
Approaching	APP	Threat of risk within the next 6 months
Distant	DIS	Threat of risk within the next 12 months
Very Distant	VDI	Threat over 12 months away

Risk Impact Matrix Key

IMPACT	Multiplier	1	2	3	4	5
Very High	50					
High	25					
Medium	10					
Low	5					
	Multiplier	1	2	3	4	5
	LIKELIHOOD	Rare	Low	Medium	High	Very High

Mitigation Actions - Status

Completed	
On target	On target for completion
Ongoing	Delayed/delay anticipated but no negative impact on risk mitigation
Ongoing	Delayed/delay anticipated with negative impact on risk mitigation

Strategic Risk Scores & Trends

RISK MATRIX

IMPACT	Multiplier	1	2	3	4	5	Total	Trend
Very High	50			R 2 R 5			2	↓
High	25				R 7	R 1	2	-
Medium	10						0	-
Low	5						0	-
	Multiplier	1	2	3	4	5		
	LIKELIHOOD	Rare	Low	Medium	High	Very High		

QUARTERLY SCORE TRENDS

	2021-22			2022-23	
	Q2	Q3	Q4	Q1	Q2
1. Food Security			125	125 ↔	125 ↔
2. Delays in Recruitment	200 ↔	200 ↔	150 ↓	150 ↔	150 ↔
4. Emerging Technology (de-escalation to level 2 risk register proposed)		150	150 ↔	150 ↔	150 ↔
5. Misinformation	150 ↔	150 ↔	150 ↔	150 ↔	150 ↔
6. Public Sector Resourcing (proposed moved to Strategic Issue Register)	100 ↔	200 ↑	200 ↔	250 ↑	250 ↔
7. Changes to FSS roles and remit	100 ↔	100 ↔	100 ↔	100 ↔	100 ↔

Integrated Assurance

The Three Lines of Defence Model

- **First line:** contains the day-to-day arrangements that have been implemented to ensure risks are identified and managed
- **Second line:** oversees the first line via strategic measures or management
- **Third line:** comes from Internal Audit providing independent assurance. Division Heads should consider the Scottish Public Finance Manual (SPFM) Internal Controls Checklist as a focus

Risk	First Line	Second Line	Third Line	Gaps in Assurance (Area's identified as absent or requiring improvement which would support & / or alleviate identified risk)
1. Food Security Slides (6-8)	<ul style="list-style-type: none"> • Currently monitored through the Incidents Management Process for continual review of risks identified as not only a food safety issue but a food fraud issue also. 	<ul style="list-style-type: none"> • Monitored through the TTCG process where food crime as a result of the Ukraine crisis has been recorded as an emerging risk and that will be fed through the intelligence collection process. 	<ul style="list-style-type: none"> • Quarterly review of the Strategic Risk Register via the Strategic Risk Management Forum. 	
2. Delays in Recruitment Slides (9-11)	<ul style="list-style-type: none"> • Weekly meetings between FSSHR and SGHR to discuss recruitment challenges and/or blockages • Monthly meetings between Head of SGHR and Head of G to unpick any challenges and plan for future recruitment strategies • Fully established HR business partnering model designed to improve greater understanding and communication between HR and other FSS Divisions 	<ul style="list-style-type: none"> • Monthly HR updates to members of DGG and a forum for feedback to G and I Division • CEO attends Chief Exec delivery body group which is a forum that enables scrutiny and engagement on recruitment issues. • Revised set of HR metrics to be presented to 6 weekly FSS People Board and 6 monthly to DGG for review. • Monthly Resourcing panel (chaired by CEO) enabling FSS vacancies to be reviewed and considered within a strategic forum 	<ul style="list-style-type: none"> • 6 monthly HR update presented to Finance & Business Committee for scrutiny • Chair of Business Committee briefs FSS Board on HR Recruitment Issues • ARC reviews SG recruitment delays as part of Strategic Risk discussion 	
5. Misinformation Slides (12-14)	<ul style="list-style-type: none"> • Early connections and relationship building to be undertaken with the new Scottish Government team of Cabinet Secretaries, Ministers, Special Advisers and others with responsibility for delivering on the Programme for Government. • Restructure of our Communications and Marketing team to boost capability and significantly increase resource capacity. 	<ul style="list-style-type: none"> • Metrics to be put in place to measure and therefore manage penetration and impact of our messaging, FSS' reputation with key stakeholders and comms impact. 	<ul style="list-style-type: none"> • Independent assurance supplied Internal Audit. To ensure that the first two lines are operating effectively and advise how they could be improved. 	
7. Changes to FSS roles and remit Slides (15-17)	<ul style="list-style-type: none"> • Early connections and relationship building to be undertaken with the Scottish Government team of Cabinet Secretaries, Ministers, Special Advisers in addition to OGDs such as FSA and UKG to define a strategic forward look and anticipate issues that affect our remit. 	<ul style="list-style-type: none"> • CEO weekly SG Directors call to collaborate and define ways forward. 	<ul style="list-style-type: none"> • ELT meetings with SG/FSA opposite numbers ensuring alignment. 	



Strategic Risk No 1:

Impacts of the cost of living and food production (e.g. caused by Ukraine invasion by Russia, energy costs, EU Exit) and likely impact on our food and feed supply chains, leading to new or increased risks to consumer interests and public health

Food Security

Risk No: 1	Executive Lead: I McWatt / R McNaughton	Version: 2.0	Date risk reviewed: Nov-22
Risk Title		Risk Description	
<p>Impacts of the cost of living and food production (e.g. caused by Ukraine invasion by Russia, energy costs, EU Exit) and likely impact on our food and feed supply chains, leading to new or increased risks to consumer interests and public health</p>		<p>Cause: Events such as the Ukraine invasion by Russia, energy costs and EU Exit impacting on the cost of living and food production.</p> <p>Event: Disruptions in the supply chain across the food industry.</p> <p>Effect: The integrity of our food supply chain is compromised, introducing food safety risks and opportunities for food crime.</p>	
Strategic Objective(s)		Strategic Goals	
<ul style="list-style-type: none"> • Food is Safe and Authentic • Responsible Food Businesses are Enabled to Thrive • Consumers are empowered to make positive choices about food • FSS is Trusted and Influential 		<ol style="list-style-type: none"> 1. A food safety and standards assurance system that commands international respect and consumer confidence, supporting the Scottish economy beyond EU Exit. 2. A regulatory system that engages with businesses to educate and enable compliance, rewards best practice, and applies appropriate sanctions when laws are broken. 3. A research and data science capability which enables us to detect risks, monitor public health trends and consumer behaviours, and translate evidence into action. 5. Be respected as an authority on food protection and public health nutrition, promoting change through impactful relationships within and beyond Scotland that enable us to influence, learn and collaborate. 	

Food Security

Current Risk					Target Risk		
Likelihood	Impact	SCORE	(threat) Trend	Proximity	Likelihood	Impact	SCORE
5	25	125	Increasing	Imminent	3	25	75

CONTROLS IN PLACE

Quarter 1

Goal	Mitigating Actions	% Complete	Status	Original Completion Date	Revised Completion Date
ALL	<p>FSS have established a internal Incident Management Team with Ian McWatt as Chair to oversee the Ukraine situation and any implications for Scotland’s food and feed supply chain. He has set in place a number of organisational objectives and a series of mitigating actions.</p> <p>Objectives</p> <ol style="list-style-type: none"> 1. To safeguard consumer’s interests by ensuring food and feed supply is safe, protecting consumers by minimising potential public health risks arising from, or as an indirect, consequence of Russia’s attack on Ukraine. 2. To respond in line with SG’s plan, supporting OGD’s effort ensuring that the importation of food and feed does not present a risk to Scottish public health and that the importance of food and feed safety and biosecurity is clearly understood across governments. 3. To provide information , guidance and support to FSS staff, Food businesses, consumers and other stakeholders who are concerned and / or impacted, by the ongoing incident. 4. To minimise potential opportunities for fraudulent activity in relation to the economic impact as a result of Russia’s attack on Ukraine. 5. To contain and handle the incident within FSS’ organisational capacity. 	N/A	IMcW	ongoing	



Strategic Risk No 2:

Delays in recruitment.

Delays in Recruitment

Risk No: 2	Executive Lead: J Hesketh-Laird / G McEwan	Version: 1.0	Date risk reviewed: Nov-22
Risk Title		Risk Description	
<p>DELAYS IN RECRUITMENT</p> <p>There is a risk that the continued inconsistent delivery of shared services provision toward FSS by SG HR could lead to further negative implications upon delivery of FSS Operational services across Scotland.</p>		<p>Cause: Lack of Scottish Government investment in HR Resource, outdated IT, Silo working between SG Recruitment and On-boarding teams and a general failure to modernise its approach to recruitment.</p> <p>Event: Continual inconsistent and inadequate service provision provided to FSS from SG Shared Services.</p> <p>Effect: Significant delays in FSS recruitment and On-boarding has led to a high number of vacancies and vulnerabilities which has placed acute pressures on FSS ability to deliver upon Operational services. This ineffective system could lead to severe criticism and reputational damage from Business Owners, Politicians and National Media.</p>	
Strategic Objective(s)		Strategic Goals	
<p>Resourcing Impacts upon FSS’s ability to delivery on all Strategic Objectives</p>		<ol style="list-style-type: none"> 1. A food safety and standards assurance system that commands international respect and consumer confidence, supporting the Scottish economy beyond EU Exit. 2. A regulatory system that engages with businesses to educate and enable compliance, rewards best practice, and applies appropriate sanctions when laws are broken. 3. A research and data science capability which enables us to detect risks, monitor public health trends and consumer behaviours, and translate evidence into action. 4. A food environment which empowers consumers to make safe, healthy, and sustainable choices. 	

Delays in Recruitment

Current Risk					Target Risk				
Likelihood	Impact	SCORE	(threat) Trend	Proximity	Likelihood	Impact	SCORE		
3	50	150	Static	Imminent	3	25	75		
CONTROLS IN PLACE									
Quarter 4									
Goal	Mitigating Actions					% Complete	Status	Original Completion Date	Revised Completion Date
All	New Scottish Government Recruitment platform in place since January 22 which is easing recruitment delays. Marked as ongoing until teething issues resolved.					100		Apr-22	Complete
	SDBG have established a working group to review all recruitment issues and find solutions with Scottish Government. FSS have the SG Head of HR as part of the group.					100		Apr-22	Complete
	SG shared Services Transformation Programme.					50		Apr-23	
	Undertake a HR Department review – redefine roles and responsibilities to support People Strategy.					40		Dec-22	Mar-23



Strategic Risk No 5:

Misinformation.

Misinformation

Risk No: 5	Executive Lead: J Hesketh-Laird / K Bullock	Version: 1.0	Date risk reviewed: Nov-22
Risk Title		Risk Description	
<p>MISINFORMATION</p> <p>Strengthen FSS brand and reputation to cut through misinformation, stand out in a noisy landscape and be the trusted source for information based on science and evidence.</p>		<p>Cause: Negative publicity, unforeseen events or food related incidents, businesses with contradictory messages looking for commercial gain. The risk applies mostly to digital channels, for example social media.</p> <p>Event: Spread of third party false or negative information in the public domain reaching, or targeted at, FSS audience segments.</p> <p>Effect: Brand and reputational damage impacting FSS’ authority as a trusted source.</p>	
Strategic Objective(s)		Strategic Goals	
<ul style="list-style-type: none"> Consumers are empowered to make positive choices about food. FSS is trusted and influential. 		<p>5. Be respected as an authority on food protection and public health nutrition, promoting change through impactful relationships within and beyond Scotland that enable us to influence, learn and collaborate.</p> <p>6. Engage with all parts of society in Scotland; understanding the issues that matter to consumers and providing information that is tailored to their needs.</p>	

Misinformation

Current Risk					Target Risk				
Likelihood	Impact	SCORE	(threat) Trend	Proximity	Likelihood	Impact	SCORE		
3	50	150	Increasing	Approaching	3	25	75		
CONTROLS IN PLACE									
Quarter 4									
Goal	Mitigation Actions					% Complete	Status	Original Completion Date	Revised Completion Date
5/6	Deliver a refreshed Incident Communications plan aligned with the incident prevention strategy.					30		Sept-22	Feb-23
5/6	Review of current practice, processes, language and technology. Consider wider audience segments than simply BSL.					50		Jun-22	BAU
5/6	Deliver a social media strategy to elevate FSS' position, levels of following and engagement.					85		Dec-22	
5/6	Deliver media engagement plan to cement existing relationships and build new one's positioning FSS as a trusted source of information and a 'go to' for comment.					80		Jun-22	Ongoing
5/6	Development of a public affairs and stakeholder engagement strategy when resource is in place.					20		July-23	
5/6	SEMs strategy to improve data quality and increase e-communications for direct engagement with audience segments.					20		Sept-23	



Strategic Risk No 7:

Changes to FSS roles and remit.

Change to FSS's Role & Remit

Risk No: 7	Executive Lead: J Hesketh-Laird	Version: 1.0	Date risk reviewed: Nov-22
Risk Title		Risk Description	
<p>Scottish Ministers drive changes in FSS Strategy and delivery responsibilities.</p>		<p>Cause: FSS is directed by Ministers to deliver on new responsibilities or that we have responsibilities relieved from us. Presently potential changes include a risk that the proposed Scottish Veterinary Service (SVS) announced by Mairi Gougeon would remove or change our meat hygiene inspection functions. Given financial constraints, Scottish Ministers (SM) may defer setting up a Food Commission under the Good Food Nation Act and expect FSS to pick up the function pending its creation.</p> <p>Event: Changes to FSS strategy and work plan are needed based on Ministerial decision on our roles and responsibilities.</p> <p>Effect: For SVS a reduction in our staffing and budget for OVs or an expectation that more be delivered by FSS on Good Food Nation (GFN), additional work may flow to FSS should a Food Commission be deferred whilst GFN plans continue to be developed</p>	
Strategic Objective(s)		Strategic Goals	
<p>Impacts upon FSS's ability to delivery on all Strategic Objectives</p>		<ol style="list-style-type: none"> 1. A food safety and standards assurance system that commands international respect and consumer confidence, supporting the Scottish economy beyond EU Exit. 2. A regulatory system that engages with businesses to educate and enable compliance, rewards best practice, and applies appropriate sanctions when laws are broken. 3. A research and data science capability which enables us to detect risks, monitor public health trends and consumer behaviours, and translate evidence into action. 4. A food environment which empowers consumers to make safe, healthy, and sustainable choices. 6. Engage with all parts of society in Scotland; understanding the issues that matter to consumers and providing information that is tailored to their needs. 	

Change to FSS's Role & Remit

Current Risk					Target Risk				
Likelihood	Impact	SCORE	(threat) Trend	Proximity	Likelihood	Impact	SCORE		
4	25	100	Increasing	Approaching	4	10	40		
CONTROLS IN PLACE									
Quarter 4									
Goal	Mitigating Actions					% Complete	Status	Original Completion Date	Revised Completion Date
All	<p>SVS: FSS involvement and influence through the SVS Programme Board (attended by I McWatt) and Steering Group (attended by B Campbell and E Gafenco). Programme Board has agreed a notional Programme timescale up to April 2025 however milestones potentially affecting FSS will be ongoing).</p>					25		Dec-22	Apr-25
	<p>Good Food Nation: Maintain contact with GFN Bill team, through both Nutrition Science & Policy (NSP) team in terms of input to draft plan/public health intersect (NSP team) and UKIRT for wider FSS interests.</p>					30		Dec-22	
	<p>Establishing a new Head of Public Affairs role in FSS to ensure the importance of FSS and our roles, responsibilities and achievements have visibility and understanding by MSPs - post filled start date Feb 2023. Will develop an engagement plan with key Parliamentarians to grow understanding of our role and functions and challenges. And plans are in place to monitor our regard and visibility in the Parliament – a baseline survey being commissioned for Q3 2022 and regular monitoring and tracking thereafter. Research/ monitoring piece is complete presentation of the findings in Decembers ELT.</p>					70		Jun-22	Aug-23
	<p>Developing a wider stakeholder engagement plan to grow understanding of our role and functions and challenges.</p>					50		Dec-22	



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Risk proposed as:

**Moved to the Strategic Issue
Register**



Public Sector Resourcing

Risk No: 6	Executive Lead: I McWatt / L Murray	Version: 3.0	Date risk reviewed: Oct-22
Risk Title		Risk Description	
<p>PUBLIC SECTOR RESOURCING</p> <p>Increasing pressures on Local Authorities and FSS result in a delivery model which lacks the resilience needed to meet future challenges.</p>		<p>Cause: The Public Sector has failed to invest in the training and supply of professional resource, mainly due to funding cuts.</p> <p>Event: Local Authorities are unable to deliver food law requirements as prescribed in the Food Law Code of practice.</p> <p>Effect: The demand for professionally qualified staff within Local Authority Environmental Health and Public Analyst Services far outstrips supply risking the ability to meet statutory food law intervention requirements.</p>	
Strategic Objective(s)		Strategic Goals	
<ul style="list-style-type: none"> • Food is Safe and Authentic • Responsible Food Businesses are Enabled to Thrive • Consumers are empowered to make positive choices about food • FSS is Trusted and Influential 		<ol style="list-style-type: none"> 1. A food safety and standards assurance system that commands international respect and consumer confidence, supporting the Scottish economy beyond EU Exit. 2. A regulatory system that engages with businesses to educate and enable compliance, rewards best practice, and applies appropriate sanctions when laws are broken 5. Be respected as an authority on food protection and public health nutrition, promoting change through impactful relationships within and beyond Scotland that enable us to influence, learn and collaborate. 	

Public Sector Resourcing

Current Risk					Target Risk				
Likelihood	Impact	SCORE	(threat) Trend	Proximity	Likelihood	Impact	SCORE		
5	50	250	Static	Imminent	3	25	75		
CONTROLS IN PLACE									
Quarter 3									
Goal	Mitigating Actions					% Complete	Status	Original Completion Date	Revised Completion Date
1	Imports (International Assurance): Revised - Deliver a new 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 checking regimes are in place by 2023.					20		Jul-22	Dec-23
2	Animal Feed Delivery Establish a fully resourced animal feed delivery team and ensure a plan is in place to implement new inspection and sampling regimes at producers and BCPs in Scotland. Feed Team not yet adequately resourced					20		Aug-22	Resource dependent
2	LA Delivery: Work with Local Authorities to monitor the reinstatement of official control delivery at food establishments across Scotland including the gathering of re-start data via regular temperature check questionnaires and data on estimated future resource requirements. Resource calculation tool updated and will be communicated via ENF to all LAs. Implementation groups being established to ensure consistent delivery.					30		Mar-23	2023-24
2	LA Delivery: Consider areas of simplification to the current delivery model developing a system that targets resources towards the highest risk. Blue print development underway, series of workshops delivered and planning for phases on track. Papers being prepared for relevant stakeholder and partners as well as ELT and the Board.					10		Dec-22	Dec-25
2	LA Delivery: Provide an effective Food Law Business Portal to assist business compliance and assist LAs in management of new businesses and in the provision of support and education.					15		Mar-25	
3	Public Analyst Laboratory Service: An initial review of issues affecting the current PA laboratories has been undertaken and a proposal for a nationally funded delivery model for food and feed laboratory services has been agreed by the FSS Board. The Chair will engage with Scottish ministers on the need for a formal business case to assess how this function can be delivered at national level alongside wider strategy for strengthening public health laboratory infrastructure in Scotland.					20		Mar-23	Mar-24

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Risk proposed as:

De-escalated



Emerging Technology

Risk No: 4	Executive Lead: I McWatt / G Mournian	Version: 1.0	Date risk reviewed: Oct-22
Risk Title		Risk Description	
<p>EMERGING TECHNOLOGY</p> <p>Ensuring regulation and assurance keeps pace with new products and e-commerce and the expansion of online food markets.</p>		<p>Cause: FSS failure/inability to adapt and develop suitable regulatory responses or measures that keep pace with, and take account of changes in technology in the food chain or at point of sale etc.</p> <p>Event: Divergent regulatory frameworks across the UK or regulatory frameworks in Scotland that are not fit for purpose and not based on science and evidence.</p> <p>Effect: Lack of clarity for FBOs, industry, enforcers and consumers. Unintended consequences with regards to the operation of the Internal Market Act in Scotland</p>	
Strategic Objective(s)		Strategic Goals	
<ul style="list-style-type: none"> Responsible businesses are enabled to thrive. 		<ol style="list-style-type: none"> 1. A food safety and standards assurance system that commands international respect and consumer confidence, supporting the Scottish economy beyond EU Exit. 2. A regulatory system that engages with businesses to educate and enable compliance, rewards best practice, and applies appropriate sanctions when laws are broken 3. A research and data science capability which enables us to detect risks, monitor public health trends and consumer behaviours, and translate evidence into action 4. A food environment which empowers consumers to make safe, healthy, and sustainable choices. 	

Emerging Technology

Current Risk					Target Risk				
likelihood	Impact	SCORE	(threat) Trend	Proximity	Likelihood	Impact	SCORE		
3	50	150	Increasing	Close	3	25	75		
CONTROLS IN PLACE									
Quarter 4									
Goal	Mitigation Actions					% Complete	Status	Original Completion Date	Revised Completion Date
1	Engagement with FSA and SG with regards to impact any England only reviews (genome editing, novel foods regulatory review, anticipatory regulation) will have on the regulatory frameworks in Scotland and how FSS can engage with UKG matters.					20		n/a	
1	Discussions with SGLD on potential legislative vehicles that could introduce regulatory regimes across GB, initially developed as UKG only initiatives.					10		n/a	
1	Liaison with Ministers and CUKR on matters where there are increased sensitivity (genome editing).					20		n/a	
3	Development and commissioning of targeted consumer research, undertaken by Social Science, to fill evidence gaps around emerging technologies and how they will impact the future regulatory landscape. This research can also be used to inform and support any recommendations to ELT, Board, Ministers.					20		n/a	