



Food Standards Scotland Science, Evidence and Information governance statement

October 2022 (update)

What is Science, Evidence and Information governance?

Science, Evidence and Information Governance is:

'the methods by which all our staff assure and demonstrate that science, evidence, information and analysis are obtained, interpreted, used and communicated appropriately and effectively by FSS'

Food Standard Scotland's values and guiding principles¹ are:

Consumer Focussed

- Keep public health and consumer protection at the heart of what we do
- Ensure our actions are targeted, recognising the diversity of people in Scotland and taking account of health inequalities

Evidence Based

- Ensure our work is underpinned by robust science and data
- Maintain an understanding of the issues that matter most to consumers in Scotland

Fair and Proportionate

- Protect public health and support economic growth – promote compliance by regulating fairly, firmly and proportionately
- Establish trust, ensuring regulatory objectives are transparent and our actions are consistent and timely

Independent

- Preserve our independence, working at arm's length from government and industry
- Influence UK policy development through robust risk analysis, recommending decisions which are in the best interests of consumers in Scotland

Inclusive and Open

- Respect the rights of every individual, organisation and business to have a say in the matters that affect them, and work collaboratively to achieve the greatest benefit for the people of Scotland
- Ensure transparency in our decision making, advice and recommendations, by publishing our evidence base and enabling those impacted to understand the issue.

Put simply, science, evidence and information (SEI) governance is what our staff do to ensure we live up to these core values in practice, and to show how we do this. Our SEI strategy sets out for all our staff five key principles to ensure we gather and use SEI effectively to achieve our mission to be Scotland's leading authority on food safety, standards and healthy eating. It aims to direct how our staff identify and prioritise our SEI needs, how our staff will work with others on SEI gathering and interpretation, enable us to enhance, manage and communicate risks to public health effectively and to ensure that our SEI support's our six

¹ [Healthy, Safe, Sustainable: Driving Scotland's Food Future \(foodstandards.gov.scot\)](https://www.foodstandards.gov.scot)

strategic outcomes. Our SEI governance statement will support transparency in how we deal with uncertainty in current evidence, and how our staff weigh evidence and balance both risks and benefits to both consumers and other stakeholders in how we make our decisions.

Scope

FSS is an organisation that manages current and future risks in food and feed in Scotland using the principles of the Scottish Government risk framework.

This statement focuses on how our staff gather and use SEI in our policy development and decision making. As a science and evidence-based organisation, FSS regards SEI governance as part of our governance and assurance arrangements².

Principles

The starting point for our SEI governance is our commitment to, all our staff, basing decisions upon sound SEI and being open and transparent in all our work with the public, stakeholders and partners. This means:

- basing our policies, decisions and advice on the best available SEI and analysis, including independent expert advice;
- being open about the SEI and analysis underpinning our decisions, including any uncertainties, gaps and assumptions, and how we have used scientific evidence and analysis, and any other factors (political, economic, social, legal, environmental, technological, security), in our decision-making and advice;
- ensuring that our SEI and analysis is informed by input, scrutiny and challenge from experts and other stakeholders; and
- making our SEI and analysis available, where possible as open data, for further use by the science community and by other stakeholders.

All our staff will follow the internationally established principles for risk analysis as set out in the **Codex Working Principles for Risk Analysis**³, to ensure that risks and benefits are identified, assessed, managed and communicated properly and transparently. Our [risk analysis process](#) sets out how all our staff approach the management of risk as an organisation and under different circumstances.

Roles and responsibilities: risk assessment and risk management

Good SEI governance relies on having clear, distinct roles for risk assessment and risk management and, more broadly, for using independent scientific advice and decision-making. This helps to ensure that scientific aspects of risk assessment are not influenced inappropriately by risk management considerations, or by risk managers, and that risk assessors do not seek to give decision-makers answers that reflect just political objectives rather than scientific facts. However, there must be a clear and informative dialogue between risk assessment and risk management, and between expert advice and decision-making.

² [Corporate Governance | Food Standards Scotland](#)

³ <http://www.fao.org/docrep/006/y4800e/y4800e0o.htm>

Independent expert advice on risk assessment and on other aspects of evidence gathering and use of science can be provided to FSS by independent UK Scientific Advisory Committees (SACs), and accessed through risk assessments and opinions published by international authorities including the European Food Safety Authority (EFSA), and other expert advisory bodies and independent experts, as necessary. In-house risk assessment can be carried out by FSS experts e.g. during an incident and where previous independent assessments provide an agreed, relevant guideline value for exposure. Where necessary we check our interpretation is consistent with the established assessment.

Decisions on risk management are made by the FSS Executive and Board, drawing on risk assessments, other scientific evidence and advice, and other relevant factors as defined by the SG risk framework within our corporate guidance⁴. This process operates transparently. The FSS Board hold meetings in open session, and publish their agendas, papers and minutes.

Procedures, tools and guidance for science and evidence governance and policy making in Government

We follow established principles and guidelines agreed by Scottish Government, across the UK and internationally, which may be supplemented by procedures and guidelines we have developed ourselves. We follow cross-government guidance on good policy-making and the use of scientific evidence, including:

- The ***Guidelines on the use of scientific and engineering advice in policy-making***⁵ and the ***Principles for Scientific Advice to Government***⁶ developed by the Government Chief Scientific Adviser and the Government office for Science;
- Guidance on appraisal and evaluation provided by HM Treasury in the ***Green book***⁷ and ***Magenta book***⁸; and
- The ***Universal Ethical Code for Scientists***⁹, ***The Joint Code of Practice for Research***¹⁰ and ***the Government Social Research code***¹¹ for the social science professions in Government

FSS Science, Evidence and Information Checklist. Our SEI checklist is a key tool for all our staff and underpins our SEI governance. It sets out the points that should be considered by our staff when commissioning all work using SEI, when preparing and communicating papers and proposals which deal with science and evidence-based issues (including social science) or draw on advice of independent scientific assessments. It provides a framework for assurance and challenge of this work by the FSS Chief Scientific Adviser, the FSS Executive and ultimately by the FSS Board.

Risk assessments in food incidents The ***FSS Incident Management framework***¹² highlights key issues to be considered in developing and communicating risk assessment

⁴ [http://saltire/my-workplace/Pages/My-Workplace.aspx#Corporate governance](http://saltire/my-workplace/Pages/My-Workplace.aspx#Corporate%20governance)

⁵ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/293037/10-669-gcsa-guidelines-scientific-engineering-advice-policy-making.pdf

⁶ <https://www.gov.uk/government/publications/scientific-advice-to-government-principles>

⁷ <https://www.gov.uk/government/publications/the-green-book-appraisal-and-evaluation-in-central-government>

⁸ <https://www.gov.uk/government/publications/the-magenta-book>

⁹ <https://www.gov.uk/government/publications/universal-ethical-code-for-scientists>

¹⁰ <https://www.gov.uk/government/publications/joint-code-of-practice-for-research-jcopr>

¹¹ <https://www.gov.uk/government/organisations/civil-service-government-social-research-profession>

during incidents, reflecting the particular challenges arising from the lack of time and information that may characterise them particularly in their early stages. The framework defines clear, distinct roles for risk assessment and risk management and, more broadly, for the use of independent scientific advice and decision-making.

Ensuring our SEI is current and robust

We will be open and transparent in identifying issues and defining our SEI needs

We identify the evidence we need through the expertise of our staff and input from SACs, other experts and stakeholders, through regular dialogue, attending workshops/meetings, and peer review of our research ideas and requirements. We will prioritise our evidence needs annually and publish a forward evidence plan setting out the work we plan to commission and inviting comments including on evidence and information that may already exist and can address the identified needs, on opportunities for collaboration, and whether we have defined our evidence needs in the best way.

We will use quality assurance in commissioning and gathering SEI

We ensure the quality and fitness-for -purpose of the work we commission by peer review of research proposals, final reports and outputs. The guidance within the **Scottish Government Public Sector Procurement in Scotland** ¹³ sets out the process that governs our purchasing of goods and services including SEI. We will procure our SEI, wherever appropriate, and as determined by the financial cost of the project, through open competition.

We ensure and evaluate the quality of our commissioned SEI through appropriate quality assurance (including accreditation of methods). We require all research we fund to comply with the **Joint Code of Practice for Research** which sets out standards for the quality of science and the quality of research processes that contractors who carry out research on behalf of FSS. The joint code was developed with Scottish Government, other Government Departments such as the Food Standards Agency, the Department for Food and Rural Affairs, and UK research councils such as the Biotechnology and Biological Sciences Research Council (BBSRC) and the Natural Environment Research Council (NERC).

We will ensure evaluation of our SEI

An evaluation plan for commissioned SEI will be built in and agreed internally at the onset of the commissioning process. We will evaluate the quality, the use and impact on policy of our completed projects and programmes, through internal and or external independent peer review. Evaluation of our policies and programmes includes consideration of the use and impact of all our SEI and analysis, within the framework of policy evaluation.

We will welcome and seek challenge

We will ensure that our SEI and analysis is informed by input, scrutiny and challenge by experts and other stakeholders through direct liaison and appropriate consultation. We will invite comments, annually, on our forward SEI needs.

¹² [Incident Management Framework - 2022.pdf \(foodstandards.gov.scot\)](#)

¹³ <http://www.gov.scot/Topics/Government/Procurement>

Publication and use of our SEI

We will ensure that we publish details of all the SEI that we are funding, full reports and results of our completed work (after peer review or evaluation) on our website at www.food.scot and where appropriate, in open access academic journals, as open data, or data archives.

Assurance and evaluation: how do we know we are getting it right?

The **governance and guidance** set out in this document provide the first strand of SEI assurance by setting out the clear principles and objectives, to help all our staff achieve these in practice.

The **FSS Chief Scientific Adviser (CSA)** champions the use of SEI and analysis in FSS, and provides independent assurance and challenge on how this is done. The CSA is involved in all significant policy decisions by the FSS Executive and attends all Board meetings.

Papers for the **FSS Board** set out clearly the SEI and analysis, how this has been used in developing proposals and any peer review and impact analysis. The SEI checklist sets out for our staff and for the Board how this should work in detail. Board decisions are published and clearly set out how SEI and any other information is considered and used, in formulating decisions and recommendations.

Underpinning all of these, FSS's commitment to open publication, where possible, ensures that our use of SEI and analysis is open to scrutiny and challenge by all.