

Food Standards Scotland

For safe food and healthy eating

Strategic Risk Register: Q2 2023/24



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. SLT 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			R2 R8	R7		3	-
High	25			R5			1	-
Medium	10						0	-
Low	5						0	-
	Multiplier	1	2	3	4	5		
	LIKELIHOOD	Rare	Low	Medium	High	Very High		

QUARTERLY SCORE TRENDS

	2022-23				2023-24			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
2. Delays in Recruitment	150	150	100	100	150	150		
	↔	↔	↓	↔	↑	↔		
5. Misinformation	150	150	150	150	100	75		
	↔	↔	↔	↔	↓	↓		
7. Changes to FSS roles and remit	100	100	100	100	100	200		
	↔	↔	↔	↔	↔	↑		
8. External Policy Pressures			200	150	150	150		
			↔	↓	↔	↔		

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 consider the Scottish Public Finance Manual (SPFM) Internal Controls Checklist as a focus when evidencing the assurance.

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)
2. Delays in Recruitment	<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	<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	<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. 	

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)
8. External policy pressures	<ul style="list-style-type: none"> Weekly team and divisional meetings to assess policy pressures across the division. Recruitment of additional B grade resource into the division. Review of longer term divisional structure in light of current 6 month interim structure and new delegated staff budget authority arrangements. 	<ul style="list-style-type: none"> Monthly C1/C2 and Directorate meetings to review business plan and current divisional priorities. 	<ul style="list-style-type: none"> Quarterly review of the Strategic Risk Register via the Strategic Risk Management Forum. SG REUL programme and SGLD engagement and oversight 	8. External policy pressures



Strategic Risk No 2:

Delays in recruitment.

Delays in Recruitment

Risk No: 2	Executive Lead: G McEwan	Version: 2.0	Date risk reviewed: Nov-23
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 as well as recent developments around AI 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	Increasing Static	APP	3	25	75		
CONTROLS IN PLACE									
Quarter 2									
Goal	Mitigating Actions					% Complete	Status	Original Completion Date	Revised Completion Date
All	SG shared Services Transformation Programme (in Jul-23 SG have delayed launch due to programme technical difficulties)					70		Apr-23	April-24
All	FSS now embarking upon a period of intense recruitment which requires significant input and oversight from recruiting managers & HR monitoring					100		Oct-23	Complete
All	FSS have highlighted concerns to SG HR of the recent impacts of AI and are in the process of considering appropriate firewalls. SG have since established a joint working artificial intelligence team to explore opportunities and threats presented by AI.					20		2028	
All	FSS are working closely with SG HR and Transformation Services to try and mitigate the impact of HR systems migrating to Oracle Cloud April 2024					70		Sept-23	Apr-24



Strategic Risk No 5:

Misinformation.

Misinformation

Risk No: 5	Executive Lead: G McEwan/ K Smith	Version: 2.0	Date risk reviewed: Nov-23
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		
(2) 3	(50) 25	(100) 75	Increasing Decreasing	Approaching	3	25	75		
CONTROLS IN PLACE									
Quarter 2									
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.					100		Sept-22	Complete
5/6	User research phase of the new website design and CRM to ensure it is developed with users front of mind taking into consideration accessibility, technology, language and information hierarchy.					20		Jun-22	Jan-24
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	Nov-23
5/6	Development of a public affairs and stakeholder engagement strategy when resource is in place. 15/03/23 resource now in place. Strategic plan has been approved and implementation in underway.					100		July-23	Complete
5/6	SEMs strategy to improve data quality and increase e-communications for direct engagement with audience segments.					20		Sept-23	Mar-24
5/6	The Head of Press and Media is developing a proactive press and media strategic plan.					20		Apr-24	



Strategic Risk No 7:

Changes to FSS roles and remit.

Change to FSS's Role & Remit

Risk No: 7	Executive Lead: G McEwan/ K Smith	Version: 2.0	Date risk reviewed: Nov-23
Risk Title		Risk Description	
<p>CHANGES TO FSS ROLE AND REMIT</p> <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) 50	(100) 200	Increasing	Approaching	4	10	40		
CONTROLS IN PLACE									
Quarter 2									
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 Apr-25 however milestones potentially affecting FSS will be ongoing). Ministerial decision expected by Oct-23 and next steps in terms of cessation or continued programme activity will flow from that.</p>					30		Dec-22	Apr-25
	<p>Good Food Nation: Maintain regular contact with GFN Bill team, through both Public Health Nutrition (PHN) team in terms of input to draft plan/public health intersect and UKIRT for wider FSS interests.</p>					Ongoing		Dec-22	Ongoing
	<p>With the Head of Public Affairs role in place work is ongoing to ensure FSS have visibility and understanding by MSPs. Baseline survey with MSPs and local authorities is complete and results go to the board in May. Public affairs strategy currently being developed.</p>					100		Jun-22	Complete



Strategic Risk No 8:

External policy pressures

External Policy Pressures

Risk No: 8	Executive Lead: G Mournian / S Hardie	Version: 3.0	Date risk reviewed: Nov-23
Risk Title		Risk Description	
<p>EXTERNAL POLICY PRESSURE</p> <p>UK Government drive forward a deregulatory agenda</p>		<p>Event: Decision to deregulate taken by UK Government in pursuit of EU Exit Benefits; legislation lost or reformed (intentionally or otherwise) – all pursued under very restricted timeline.</p> <p>Cause: Retained EU Law (Revocation and Reform) Act 2023 has received Royal Assent which provides reform / deregulatory powers that must be used by 2026 IMA makes divergence difficult</p> <p>Effect: Public health protections are lost or undermined, FSS resource diverted from other priorities to mitigate; unintended legislative consequences due to lack of impact assessment</p>	
Strategic Objective(s)		Strategic Goals	
<p>To be defined once workstreams agreed.</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. 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. 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. 	

External Policy Pressures

Current Risk					Target Risk				
Likelihood	Impact	SCORE	(threat) Trend	Proximity	Likelihood	Impact	SCORE		
3	50	150	Static	APP	4	10	40		
CONTROLS IN PLACE									
Quarter 2									
Goal	Mitigation Actions					% Complete	Status	Original Completion Date	Revised Completion Date
1, 2, 4, 5	Co-ordination: UKIRT team to co-ordinate FSS inputs to UK/SG programmes including SI programme in liaison with policy team and agreed Board position, guidance for staff developed. Pivot coordination effort towards managing any UKG plans for revocation of retained EU law in FSS policy areas and shift of focus to regulatory reform.					70		Dec-23	Jun-26
1, 2, 4, 5	Resourcing: CEO engaging with SG to try to secure additional resource; FSS prioritisation work to secure additional internal capacity. Additional policy recruitment now underway.					50		Sep-23	Dec-23
1, 2, 4, 5	Engagement: Continue to engage and influence external stakeholders (consumer facing orgs, MSPs, MSPs) both during course of Bill and during delivery phase. Ensure proactive policy engagement with FSA, Defra and DHSC in line with agreed Board position.					Ongoing		Ongoing	