

Food Standards Scotland

For safe food and healthy eating

**Strategic Risk Register:
Q4 2024/25**



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. SLG 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

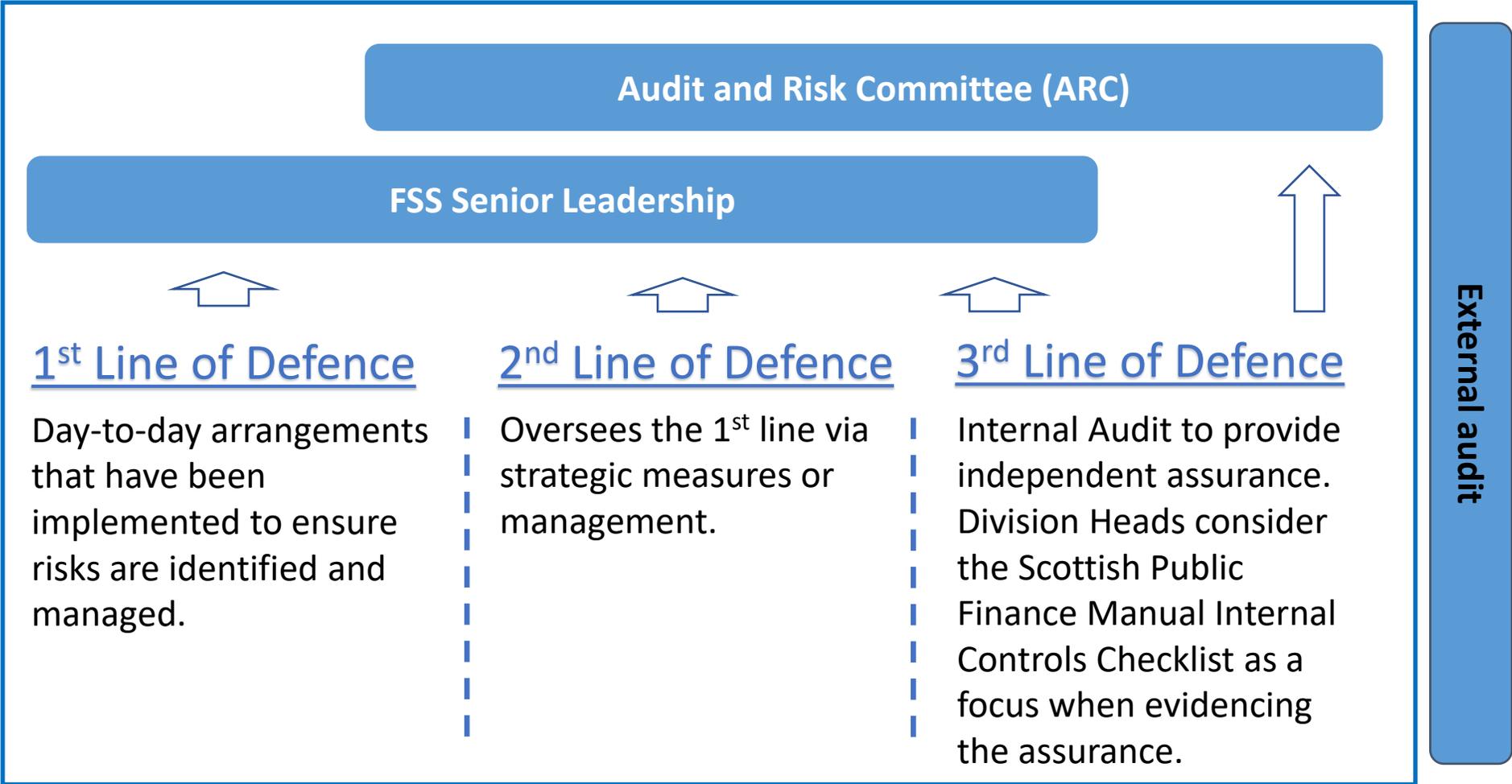
RISK MATRIX

IMPACT	Multiplier	1	2	3	4	5	Total	Trend
Very High	50		R7				1	↔
High	25			R12	R11 R10		3	↔
Medium	10						0	↔
Low	5						0	↔
	Multiplier	1	2	3	4	5		
	Likelihood	Rare	Low	Medium	High	Very High		

QUARTERLY SCORE TRENDS

	2023-24				2024-2025			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
7. Changes to FSS Roles & Remit	100 ↔	200 ↔	200 ↔	150 ↓	100 ↓	100 ↔	100 ↔	100 ↔
10. Official Controls Delivery				200 New	150 ↓	150 ↔	100 ↓	100 ↔
11. Public Service Reform				100 New	100 ↔	100 ↔	100 ↔	100 ↔
12. Maintaining an effective food surveillance capability				75 New	75 ↔	75 ↔	75 ↔	75 ↔

Integrated Assurance – the 3 lines of defence



Integrated Assurance – the 3 lines of defence

Risk	1 st Line	2 nd Line	3 rd Line	Gaps in Assurance*
7. Changes to FSS roles and remit	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.	CEO weekly SG Directors call to collaborate and define ways forward.	SLT meetings with SG/FSA opposite numbers ensuring alignment.	
10. Official Control Delivery	A dedicated delivery model consisting of in house, and delegated delivery partners covering the whole of Scotland. A recruitment and retention strategy for all field staff. An FSS contingency plan to ensure service delivery at times of stress to the delivery model. SLAs and Contracts with relevant delivery partners.	Internal monitoring policy and procedures to verify systems and protocols are being followed.	Independent assurance provided by the Audit and Assurance branch in FSS through regular internal audits.	
11. Public Service Reform	Director of CSD attends a monthly PSR Information Sharing Network where he is briefed on Scottish Government plans.	Monthly briefing to Executive Management Board members- by Director of CSD on PSR development.	<ul style="list-style-type: none"> Monthly briefing to Senior Leadership team on any strategic PSR developments CEO attends Delivery Bodies Group meeting where PSR discussions features 	Nothing at this juncture however this may change as PSR Programme matures

* Areas identified as absent and/or requiring improvement which would support and/or alleviate identified risk.

Integrated Assurance – the 3 lines of defence

Risk	1 st Line	2 nd Line	3 rd Line	Gaps in Assurance*
12. Maintaining an effective food surveillance capability	<ul style="list-style-type: none"> • Dedicated team to deliver a horizon scanning and food surveillance programme, involving regular engagement with Public Analyst laboratories. • Regular engagement with FSA, PHS and SG on strategies for strengthening food surveillance and safeguarding laboratory services and the role of food sampling in wider ambitions for One Health and biosurveillance capability. • Promotion of food surveillance activities through regular reporting to enforcement community and published reports 	<ul style="list-style-type: none"> • Prioritisation of food sampling projects in FSS’s Food and Health Research Programme, and support by EMT and SLT for funding to deliver MVP – a national food surveillance programme comprising 16 priorities targeted through evidence generated through horizon scanning activities on potential risk. • On-going review of PA services in Scotland and the production of situation reports on sampling trends, financial viability and staffing. • Collaboration with SG’s Chief Scientific Advisor on mechanisms for engaging senior LA and SG officials in solutions for safeguarding the Public Analyst service in Scotland. 	<ul style="list-style-type: none"> • Regular review by SLT and the board and escalation to ministers on the need to strengthen surveillance and laboratory provision for food and feed through correspondence from the FSS Chair. • Internal audit to review FSS strategy for ensuring compliance with its obligations under Regulation 2017/625 regarding official laboratory provision and surveillance. 	<ul style="list-style-type: none"> • FSS has no formal management role or financial authority for the delivery of PA services. • There is no centralised ring-fenced budget for the delivery of food surveillance in Scotland, or for the maintenance of public sector capacity and capability for food and animal feed testing. • The current synopsis of the SAFER programme makes reference to the role of food sampling and PA laboratories but a formal programme structure and budget allocation to fully address this risk has yet to be defined.

* Areas identified as absent and/or requiring improvement which would support and/or alleviate identified risk.



Strategic Risk No 7:

Changes to FSS roles and remit

Change to FSS's Role & Remit

Risk No: 7	Executive Lead: IMcW / G Purdon	Version: 2.0	Date risk reviewed: Apr-25
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 could be on the horizon with the recent change in UK Government and as Scottish Ministers understand the implications from this.</p> <p>Event: Changes to FSS strategy and work plan are needed based on Ministerial decision on our roles and responsibilities.</p> <p>Effect: There may be an expectation that more be delivered by FSS to support implementation, for example, of the Good Food Nation (GFN) ACT. Any further decisions from a new UK Government are yet unknown.</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		
2	50	100	Decreasing	Approaching	4	10	40		
CONTROLS IN PLACE									
Quarter 4									
Goal	Mitigating Actions					% Complete	Status	Original Completion Date	Revised Completion Date
	<p>Good Food Nation: Maintain regular contact with SG GFN team, through both Public Health Nutrition (PHN) and UKIRT for wider FSS interests. In July 2024, the FSS Chair met with the Cab Sec (Ms Gougeon) to discuss in July where she provided reassurance regarding our respective roles and responsibilities in terms of FSS and the food commission (and mitigated against the risk to FSS). In August 2024, Dennis Overton was appointed as the first Chair of the Scottish Food Commission (SFC). In December 24 recruitment of the SFC members commenced, with the CE recruitment to follow early 2025. Risk scoring remains at a likelihood to 2 with impact remaining unchanged at 50 whilst uncertainty remains around the role of new Food commission. The score will be revisited once the body has been launched and there is clarity around how the body will operate.</p>					Ongoing		Dec-22	Ongoing



Strategic Risk No 10:

Official Control Delivery

Official Control Delivery

Risk No: 10	Executive Lead: Ian McWatt/Bryan Campbell	Version: 1.0	Date risk reviewed: Apr-25
Risk Title		Risk Description	
Official Control Delivery		<p>Event: The short-, medium- and long-term outlook for Official Control delivery, for which FSS is the Competent Authority (CA), in accordance with the Official Control Regulations (OCR), for meat, shellfish, feed and wine, is extremely challenging, with a predicted shortfall of suitably qualified officials available, to allow FSS to fulfil its statutory obligations.</p> <p>Cause: There is a significant resource challenges facing FSS with regards to the recruitment of suitable qualified and competent staff necessary to undertake the delivery of Official Controls. This is relevant to all sectors for which FSS is CA, however this is particularly acute in the meat sector, with regards to the recruitment of OV's and MHIs. Since EU exit the ability to recruit OV's has become increasingly difficult, due to multiple factors, with the rise of private certification services, and the introduction of stringent immigration policies by the UKG.</p> <p>Effect: This presents a critical challenge for FSS to deliver it's statutory functions as regulator and CA, with the potential to impact its reputation, trade (both domestic and export), and subsequent risks to animal welfare, the protection of consumers, and wider public health. If we are unable to meet our recruitment requirements, we may fail to fulfil our statutory obligations and/or risk legal challenge and claims for compensation from FBOs.</p>	
Strategic Objective(s)		Strategic Goals	
<p>Food is Safe and Authentic</p> <p>Responsible Food Businesses are enabled to Thrive.</p> <p>FSS is trusted and Influential</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. 	

Official Control Delivery

Current Risk					Target Risk		
Likelihood	Impact	SCORE	(threat) Trend	Proximity	Likelihood	Impact	SCORE
4	25	100	Decreasing	Approaching	2	25	50

CONTROLS IN PLACE

Quarter 4

Goal	Mitigation Actions	% Complete	Status	Original Completion Date	Revised Completion Date
1,2	<p>Meat Delivery : Detailed below is a summary of the key actions that are either in progress or being explored to address the issue of OV capacity.</p> <ul style="list-style-type: none"> Overseas recruitment/ presence – presentations at Vet Schools recognized by RCVS, advertising with “Royal Colleges”, testimonials/ library being collated from existing FSS OVs Succession planning for retiring locum OVs. Formal agreement to be set up with APHA, for mutual support, independent of SVS happening or not. So far we have helped them with Avian Influenza Exploring the possible set-up of a “recruitment agency” arrangement, to obtain suitable candidates, for us to then fully onboard and train Activities for OV role enrichment – support for APHA (disease response, market inspections etc.), collection of samples for other FSS Divisions or external stakeholders (SRUC, Moredun etc.), creation of deputy Veterinary Advisor role, pig farm inspections to assess Trichinella Controlled Housing status etc. Quality CPD (renewal of contract for HACCP 4 course delivery, attendance at relevant conferences etc.) and career progression avenues (e.g. deputy Vet Advisor) Following a new revised recruitment campaign, we are in the process of onboarding new trainee OVs and trainee MHIs, however with significant reliance still on agency backfill due to convoluted and lengthy SG recruitment processes. Onboarding process has been successful and looking to recruit fully qualified Ovs during 2025-26. Overall reliance on agency staff is reducing. 	80 90		Jan-24	Mar-25 Jul-25

Official Control Delivery

Current Risk					Target Risk				
Likelihood	Impact	SCORE	(threat) Trend	Proximity	Likelihood	Impact	SCORE		
4	25	100	Decreasing	Approaching	2	25	50		
CONTROLS IN PLACE									
Quarter 4									
Goal	Mitigation Actions					% Complete	Status	Original Completion Date	Revised Completion Date
1,2	<p>Feed Delivery: Good progress is being made to address the key recommendations contained in the action plan from the internal audit of the delivery of Feed Official Controls within the outlined time scales. Detailed below is a summary of the actions that are being progressed.</p> <ul style="list-style-type: none"> • A fully resourced FSS Feed Delivery Branch has been appointed consisting of a Lead Feed officer, 3 Senior Feed officers, overseeing a team of Feed Officers, working towards Level 1 and 2 inspection levels, and administrative support. • Subsequently the Lead Feed Officer, a Feed Officer and an administration support officer have been off on long term sick. The Feed Officer has subsequently returned to their role and the Lead Feed Officer and Administration Support Officer are due to return W/C 21 Oct. 2 members of the team, including a senior feed officer, have left FSS and one member of staff is on a TP to Scottish Government until January 2024. • A new inspection and sampling programme has been implemented for Official Control delivery covering the whole of Scotland. • A Competency Framework for all Feed Officers has now been implemented. • Further reductions in the team at senior and field officer level are imminent. • An additional Senior Feed Officer has subsequently left FSS. The Lead Feed Officer has also indicated they intend to retire in the summer. • Recruitment for 2 X Senior Feed Officers is at an advanced stage and consideration of the replacement of the Lead Feed Officer role will be considered in due course. 					30		Mar-25	Mar-26



Strategic Risk No 11:

Public Service Reform

Public Service Reform

Risk No: 11	Executive Lead: G McEwan / A Skowron	Version: 1.0	Date risk reviewed: Apr-25
Risk Title	Risk Description		
<p>Scottish Government drive forward the Public Service Reform agenda in collaboration with FSS and other stakeholders</p>	<p>Event: The medium to long term projections of demand and cost for all Scotland’s public services are extremely challenging. The Scottish Government has committed to a 10-year Public Service Reform Programme to:</p> <ul style="list-style-type: none"> • ensure public services remain fiscally sustainable, by reducing the costs and reducing long-term demand through investment in prevention. • improve outcomes, which will improve lives and reduce demand. • reduce inequalities of outcome among communities in Scotland, recognising the need not just for improved outcomes, but a focus in policy and delivery on those most disadvantaged. <p>Cause: The medium to long term projections of demand and cost for all Scotland’s public services are extremely challenging with a projected £1 billion shortfall in funding of public services from 2024 and beyond.</p> <p>Effect: The immediacy of this means we must continue to deliver efficiencies and make more effective use of resources to deliver services in a fashion that reduces demand , cost and improves outcomes for communities. This provides opportunities to collaborate better as well as share services between similar delivery bodies. a challenge of delivering regulatory, statutory and business as usual functions whilst committing time effort and resources to the Public Service Reform agenda</p>		
Strategic Outcome(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. 5. Engage with all parts of society in Scotland; understanding the issues that matter to consumers and providing information that is tailored to their needs 		

Public Service Reform

Current Risk					Target Risk				
Likelihood	Impact	SCORE	(threat) Trend	Proximity	Likelihood	Impact	SCORE		
4	25	100	Static	Approaching	3	10	30		
CONTROLS IN PLACE									
Quarter 4									
Goal	Mitigation Actions					% Complete	Status	Original Completion Date	Revised Completion Date
All	Head of Corporate Services Directorate is a member of the SG-PSR Network Board					65 100		ongoing	2026
	CEO attends monthly Delivery bodies Meeting where PSR updates are discussed and debated by senior officials					30 100		ongoing	2026
	FSS are in the process of preparing its new 2026-31 Strategy. A key feature of this will be Public Service Reform and the opportunities and benefits it provides.					35 55		Apr-26	Feb-26
	SG-Digital have made an initial commitment for significant digital investment to work with FSS on the discovery phase of a National Food Law Database to support the delivery of SAFER. The discovery phase will run until June 2025 with build thereafter. The inaugural meeting took place last year with a project team now looking at a business registration digital system. Work with IT suppliers & SG Digital teams is continuing in earnest now that developments for their primary SG directorates are nearing completion. Zudu undertook some preliminary user research and their report is due shortly. They intend to deliver a proof of concept of a business registration digital system by September 2025. FSS are now being asked to sign on to the Civtech programme as formal Challenge Sponsors and we are currently investigating the impacts of this. FSS is actively engaging with Zudu and SG Digital teams to map out additional core requirements for the new business registration digital system post the delivery of the MVP in September 2025.					10 20		Sep 25	
	FSS is working with another delivery body in sharing service provision specifically for all finance related matters. If supported this will mean FSS take on the finance responsibilities for another smaller delivery body in Scotland. This is being considered as best practice and in line PSR principles.					70		Sep-25	



Strategic Risk No 12:

Maintaining an effective food surveillance capability

Maintaining an effective food surveillance capability

Risk No: 12	Executive Lead: Jacqui McElhiney	Version: 1.0	Date risk reviewed: Apr-25
Risk Title Failure to deliver a robust food surveillance strategy Increasing pressures on FSS budget allocation and lack of Local Authority investment results in compromised surveillance capability which is unable to keep pace with emerging risks to Scotland's food chain.		Risk Description Event: FSS is unable to deliver a food surveillance sampling strategy for Scotland as defined by our organisational strategy (see page 15: We will continue to develop our horizon scanning and surveillance capabilities to ensure we are able to predict and identify risks, including those emerging from changes to global food trade and the regulations that are in place to protect our supply chains). Cause: <u>There are two causative factors for this risk:</u> <ul style="list-style-type: none"> • Sampling activities at local and regional levels have failed to recover to pre-pandemic levels due to issues with the current Local Authority delivery model and lack of investment in Public Analyst laboratories. • On-going resource pressures and competing demands across FSS have limited the budget for research and surveillance, preventing implementation of the sustainable food sampling surveillance strategy agreed by the FSS Board in March 2022 Effects: <ul style="list-style-type: none"> • Inadequate food sampling will result in gaps in the evidence base needed to ensure Scotland's interests are covered in UK risk analysis and provide assurance for consumers and trading partners. • Failure to maintain a robust baseline level of sampling presents a significant risk to the sustainability of scientific (Public Analyst) services in Scotland with concomitant impacts on FSS's statutory responsibilities for delivering animal feed controls and our ability to design an evidence led approach to the future delivery of official controls. 	
Strategic Outcome(s) Impacts upon FSS's ability to delivery on all Strategic Objectives: <ul style="list-style-type: none"> • Food is Safe and Authentic – to provide assurance to consumers by monitoring known issues in the food chain and identifying the impact of emerging risks picked up through horizon scanning • Consumers Have Healthier Diets – to assess the accuracy of nutritional and calorie labelling in foods on sale in Scotland • Responsible Food Businesses are enabled to thrive – to generate evidence that supports the targeting of enforcement measures and helps Scottish food producers to verify safety and standards for export. • Consumers are empowered to make positive choices about food – to generate publishable evidence on food safety, standards and labelling which supports consumer choice • FSS is trusted and influential – to generate the primary evidence base on food safety and standards in Scotland 		Strategic Goals Food surveillance capability is intrinsic to Goal 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. <u>However, the evidence base generated by surveillance is used to underpin the remaining 5 Goals:</u> <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. By providing data to support risk analysis 2. A regulatory system that engages with businesses to educate and enable compliance, rewards best practice, and applies appropriate sanctions when laws are broken. By providing data to support the targeting of enforcement to areas of risk 4. A food environment which empowers consumers to make safe, healthy, and sustainable choices. By providing data that informs our understanding of the accuracy of food labelling 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. By providing data that can be shared with partners in government, academia and the food industry 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. By providing data that can be used to engage with consumers and help us to understand their concerns. 	

Maintaining an effective food surveillance capability

Current Risk					Target Risk				
Likelihood	Impact	SCORE	(threat) Trend	Proximity	Likelihood	Impact	SCORE		
3	25	75	Static	Distant	1	25	25		
CONTROLS IN PLACE									
Quarter 4									
Goal	Mitigation Actions					% Complete	Status	Original Completion Date	Revised Completion Date
3	Ring-fence an allocation from FSS's food and health research programme to support a national targeted sampling programme into FY 2024/25 and beyond					80		Mar-24	May-26
3	Develop and implement proposals for a new shopping basket sampling approach aimed at strengthening our evidence base and levels of assurance on the safety and standards of foods commonly purchased by consumers in Scotland					50 70		Oct-25	Mar 26
3, 5	Deliver a horizon scanning programme through in-house analysis and collaboration with Local Authorities, FSA, international food bodies and industry which promotes the sharing of data and insights to support our evidence base on potential risks to Scotland's food chain from imported foods					75		Mar-24	Mar-25 Mar-26
1, 3	Work with FSA, SG and other partners to explore options for maintaining future access to scientific services for food and feed safety and standards, through the provision of support for Public Analyst laboratories and new routes for accessing the analytical expertise required to deliver food surveillance and official control verification					40 60		Mar-24	Mar-26
1, 2, 3, 4, 5	Ensure actions are taken within the SAFER programme to safeguard scientific services for food and feed, either through the existing LA operated structure or a new model					5		2025/26	2027-28