

## SAFER Programme Update: Programme Board – 12 February 2026

### 1 Purpose of the paper

- 1.1 To update the FSS Board on outcomes from the SAFER Programme Board (PB) held on 12 February 2026.
- 1.2 The PB approved the Programme Plan, Research and Evidence Strategy, Pilot for Voluntary Third-Party Assurance (vTPA) and outlined the governance arrangements for the Technical Advisory Groups (TAGs).
- 1.3 The Board is invited to:
  - **Discuss** next steps, including the approach to engagement, through the Technical Advisory Groups (TAGs)
  - **Note** the key PB outcomes from 12 February 2026.
  - **Note** that the next PB will take place on 12 May 2026.

### 2 Strategic aims

- 2.1 This work supports the following FSS Strategic Outcomes:
  - Outcome 1 – Food is safe and authentic
  - Outcome 3 – Responsible food businesses are enabled to thrive
  - Outcome 5 – FSS is trusted and influential

### 3 Background

- 3.1 SAFER is a multi-year reform programme funded through the Scottish Government's (SG's) Public Service Reform strategy. The PB provides strategic direction, oversight and assurance.
- 3.2 SAFER has 4 key pillars, linked to its vision statement and objectives:
  - Food Law Delivery – Reviewing and reforming the food law delivery model for Scotland.
  - Sustainable Funding – Considering options to sustainably fund delivery of official controls and developing a transparent and proportionate cost recovery system.
  - Dynamic Regulation and Assurance – Exploring innovative regulatory strategies for reform, focused on risk, assurance and increased efficiency.

- Data and Digital Enablement – Utilising new technologies to support food safety professionals, incentivise business compliance and enhance consumer protection.
- 3.3 FSS secured SAFER funding for 2025/26 through the SG Invest to Save (ISF) initiative (confirmed 21 May 2025), with reinvestment of any savings permitted and no requirement to repay the initial allocation.
- 3.4 A further ISF bid for 2026/27 is being developed, and confirmation of funding remains a key dependency for programme delivery. Pending confirmation of ISF funding, a £1M bridging loan from the Governance and Communities Directorate is expected from 01 April 2026. Further updates will be provided to the Board on funding for 2026/27 as discussions with SG progress.

## 4 Discussion

- 4.1 Ian McWatt, SRO, updated the PB on concerns raised by Environmental Health colleagues regarding representation and suggestions of predetermined outcomes. The PB reaffirmed that no outcomes are predetermined, that there is no centralisation agenda, and that all viable options will be assessed transparently and decisions taken will be based on evidence. This issue will be directly addressed through the Food Law Professionals TAG, ensuring transparent engagement and early sight of evidence and option development.
- 4.2 **Programme plan**
- 4.2.1 The programme plan was approved by the PB. It outlines what SAFER aims to achieve and how it will deliver its objectives and benefits, and will provide clear direction, guide implementation and support coordination, whilst enabling monitoring and evaluation.
- 4.2.2 Bryan Campbell, Head of the SAFER programme also highlighted that the milestones for Tranche 2, should be viewed as broadly indicative at this stage and will be further refined following completion of Tranche 1 and the options analysis phase.
- 4.2.3 Detailed below is a high-level overview of the programme brief, critical path, timelines and outcomes (Figure 1).

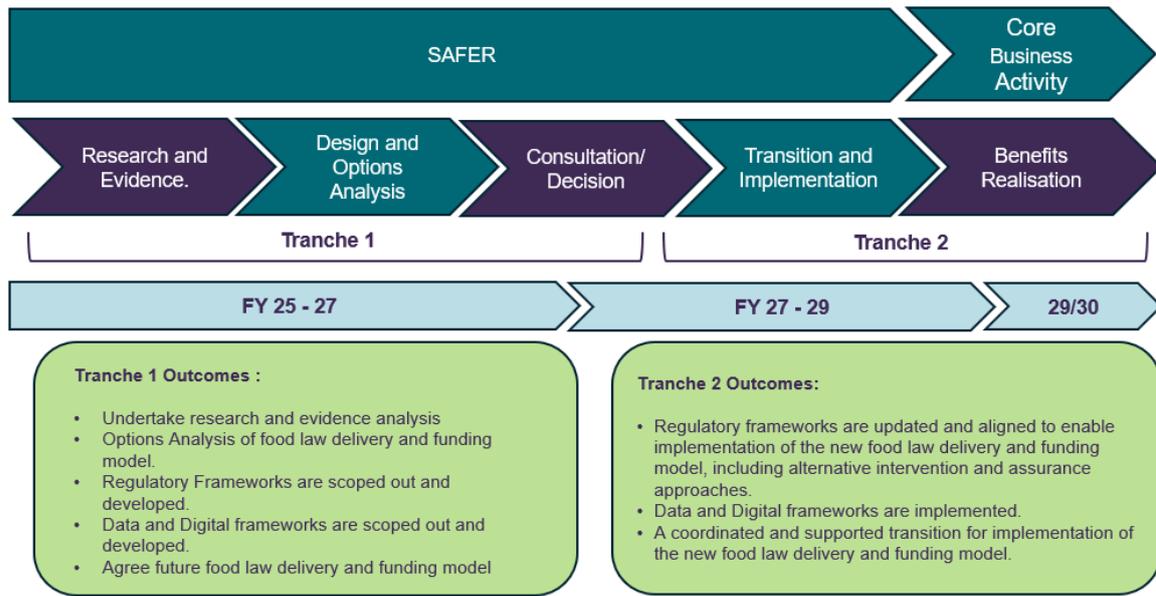


Figure 1

4.2.4 The Programme timeline is also dependent on various elements that may impact on the delivery or outcome of the programme. The main dependencies are:

- SG Public Sector Reform strategy
- Funding for the programme life cycle
- Resourcing for the programme life cycle
- Outcomes and timelines of stakeholder consultation.
- Timings of decision making by the PB.
- Continued stakeholder engagement
- Legislative change timelines (if applicable)
- SPS (Sanitary and Phytosanitary) policy work
- FSA/ UKG Reform programme

**4.3 Research and evidence strategy**

The PB reviewed and approved the programme’s research and evidence strategy, and associated plan. The strategy includes the phased research activity, principles, criteria and methodologies, that will be used throughout the programme life cycle and is designed to ensure that the options analysis and consultation process is grounded in robust evidence and transparent assessment. It will consider

operational, workforce and business impacts to support the options for an effective, proportionate and risk-based food law delivery system. A copy of the strategy has also been published on the SAFER page of the FSS website.

#### 4.4 Voluntary Third-Party Assurance (vTPA) pilot

4.4.1 The PB approved the project brief for discovery work and a pilot of voluntary Third-Party Assurance (vTPA). The pilot will gather evidence on how vTPA could complement regulatory controls within Scotland's food law framework. The project will be in three phases:

- Setting governance and validation criteria
- Piloting vTPA with assurance providers, industry, and local authorities
- Evaluating outcomes to inform recommendations

4.4.2 If successful and viable, vTPA could support and strengthen assurance and improve regulatory efficiency across Scotland's food law delivery system.

4.4.3 Further updates will be provided on the vTPA discovery work as the project progresses.

#### 4.5 Technical Advisory Groups (TAGs)

4.5.1 The PB approved plans to establish four Technical Advisory Groups (TAGs) to strengthen operational and stakeholder input. The TAGs will cover:

- Food businesses
- Food law professionals
- Communications
- Cross government issues

4.5.2 The TAGs will support research, evaluation and options development, with a co-chairs model to ensure shared ownership. PB members welcomed the approach and emphasised the importance of clarity around governance, scope and expected commitments. The programme team will provide further detail to stakeholders at the meetings in March (detailed below; Table 1) to support meaningful engagement with representative organisations and ensure expectations are clear.

4.5.3 TAGs are advisory rather than decision-making bodies; their outputs will inform PB deliberations, and areas of consensus or disagreement will be transparently surfaced to support evidence-based decision-making. Detailed below is a high-level outline of the governance arrangements for the TAGs, including their interaction with the SAFER PB and delivery teams (Figure 2).



Figure 2

**4.6 Stakeholder considerations**

- 4.6.1 At the inaugural PB on 7 October 2025, the SAFER communications and engagement strategy and associated plan were approved.
- 4.6.2 Detailed below is an overview of the engagement since the inaugural programme board and the planned engagement ahead of the 3rd SAFER programme board on 12 May 2026 (Table 1).

Communication and engagement events	Date
SFELC	October 2025
Issuing of SAFER Communications Bulletin –1, outlining the key outputs from the inaugural programme board, links to the SAFER landing page and publication of the Terms of Reference of the programme board.	November 2025
Meetings with Food Standards Agency to update on respective reform programmes	
Meeting and update to REHIS	December 2025
FSA meeting to update on respective reform programmes	January – February 2026
Two meetings with the SoCOEHS	
Update to Scottish Ministers on progress with SAFER	
Update to FSS Board (SAFER Sponsoring Group)	
Meeting with Chairs of Food Liaison Groups to discuss future engagement and the food law professionals TAG	March 2026
Meeting with Chairs of Food Liaison Groups	
Update meeting with REHIS to discuss food law professionals TAG	
Update meeting with SFELC to discuss food law professionals TAG	

Meeting with Industry representatives to discuss the food business interests TAG	
Inaugural meeting of food law professionals TAG	April 2026
Inaugural meeting of food business interests TAG	
SAFER Programme Board No. 3	May 2026

Table 1

## 5 Options appraisal

- 5.1 A formal options appraisal is not presented at this stage. Outputs from the research and evidence strategy and associated plan will inform future options appraisal work.

## 6 Identification of risks and issues

- 6.1 The SAFER Programme has identified 6 risks that pose a potential threat to successful delivery and a summary of the risks presented to the PB is outlined below (Table 2):

Date of Review: 29/01/2026		CURRENT Risk Impact & Likelihood			
Last updated by: Programme Team					
Risk ID.	Risk owner	Risk Description	Likelihood	Impact	CURRENT Risk Score
1	Bryan Campbell	<b>Programme Scope and governance</b>	2	25	50
2	Bryan Campbell	<b>Programme Resource</b>	4	50	200
3	Kate Smith	<b>Stakeholder Engagement</b>	2	50	100
4	Ian McWatt	<b>Financial Support</b>	4	50	200
5	Bryan Campbell	<b>Industry Assurance</b>	2	25	50
6	Kate Smith	<b>Stakeholder Fragmentation</b>	2	50	100

Table 2

- 6.2 Suitable controls and mitigation actions are currently underway to mitigate these risks, with programme scope and governance already mitigated to the target level.
- 6.3 In terms of the overall risk management strategy, programme-level risks will be continuously monitored and managed by risk owners in collaboration with the PMO. Each risk will be tracked against agreed mitigation actions, with regular reviews and updates captured in the programme risk register. Significant risks and trends will be highlighted to the PB for oversight and decision-making, ensuring governance and accountability. Furthermore, project level issues that could impact overall programme delivery will be escalated by the Delivery Managers to the Head of SAFER Programme and PMO.

## 7 Equality Impact Assessment and Fairer Scotland Duty

- 7.1 There are no specific issues relevant to this paper as it is an overview of the approach of the SAFER PB on the 12 May with the programme in tranche 1 focussing on the research, evidence and analysis work. The outcomes from the programme will clearly have considerations in this area and will form part of specific project planning activity.

## 8 Consumer Duty

- 8.1 The SAFER programme proposes reform to the way in which food official controls are delivered in Scotland, which clearly intersects with our consumer duty. Future programme outcomes and discussions will therefore need to take this into account.

## 9 Conclusion/Recommendations

- 9.1 The Board is asked to:
- **Note** the key outcomes from PB on the 12 February 2026 and progress to date.
  - **Note** the timeline and milestones for Tranche 2, should be viewed as broadly indicative at this stage and will be further refined following completion of Tranche 1 and the options analysis phase.
  - **Note** approval for vTPA discovery and pilot, ahead of evaluated options.
  - **Provide a view** on TAG governance and engagement approach.
  - **Note** that options appraisal work will commence following completion of the research and evidence phase, and will follow the agreed evaluation principles as outlined within the SAFER Research and Evidence Strategy.
  - **Note** the next SAFER PB is on the 12 May 2026.

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