



For safe food and
healthy eating

**Strategic Issue
Register:
Q1 2026/27**



Background



The Strategic Issue Register is designed to record and monitor issues impacting on the successful delivery of the [FSS Strategy 2026-31](#). The most important issues to FSS are those which will affect the delivery of the strategic objectives and priorities.

This approach aims to lay out a clear and direct line between the issues identified to strategy delivery and each of the strategic priorities.

The FSS Strategic Issue Register exists to ensure that:

- Strategic issues are identified and managed.
 - Actions are determined, prioritised and action plans are implemented.
 - The effectiveness of existing actions are evaluated.
 - The Strategic Issue Register supports the FSS Strategic Plan.
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Strategic Issue: Key

STATUS KEY: Severity

Very High	Destructive and unacceptable impact on FSS/business operations that will result in a major change to overall approach. Large resource consequences.
High	Significant and unacceptable impact on FSS/business operations that will require material change to critical approach, procedure or process. Challenging resource implications.
Medium	Moderate impact on FSS/business operations that will require multiple changes in approach, procedure or process. Acceptable level of resource consequences
Low	Minor impact on FSS/business operations, will require little overall change in approach. Few resource consequences.

STATUS KEY: Actions

Completed	
On target	On target for completion
Ongoing	Delayed/delay anticipated but no negative impact on successful issue resolution
Ongoing	Delayed/delay anticipated with negative impact on successful issue resolution

STATUS KEY: Priority

Very High
High
Medium
Low
Very Low

Strategic Issue Trends

QUARTERLY ISSUE TRENDS

	2025-2026								2026-2027							
	Q1		Q2		Q3		Q4		Q1		Q2		Q3		Q4	
	Priority	Severity	Priority	Severity	Priority	Severity	Priority	Severity	Priority	Severity	Priority	Severity	Priority	Severity	Priority	Severity
1. FSS Budget Allocation	Very High ↔	Very High ↔	Very High ↔	Very High ↔	Very High ↔	Very High ↔	Very High ↔	Very High ↔	Very High ↔	Very High ↔						
2. LA Food Law Delivery Model	Very High ↔	Very High ↔	Very High ↔	Very High ↔	Very High ↔	Very High ↔	Very High ↔	Very High ↔	Very High ↔	Very High ↔						
3. Cyber Security Breach			High New	High New	High ↔	High ↔	High ↔	High ↔	High ↔	High ↔						
4. Public Service Reform							High New	High New	High ↔	High ↔						



Strategic Issue No 1:

FSS BUDGET ALLOCATION

FSS Revenue budget allocation is no longer adequate to meet all its regulatory and statutory functions and responsibilities as set out within the Act and OCR

FSS Budget Allocation

Issue No: 1	Executive Lead: G McEwan	Version: 3.0	Date issue raised: Aug-22	Date issue last reviewed: Aug-26
Issue Title		Issue Description		
FSS BUDGET ALLOCATION		Full issue description FSS Revenue budget allocation is no longer adequate to meet all its regulatory and statutory functions and responsibilities as set out within the Act and OCR Escalation history FSS was heavily impacted when the UK left the EU and actual experience post-exit brought significant financial and staffing pressures on pre-existing and ongoing operational delivery. Resourcing gaps are affecting the organisation's ability to fully deliver core statutory functions across FSS despite previous reprioritisation exercises and service improvements. For financial year 2026/27 FSS has commenced the year with a notably financial deficit which will require further reduction in service and a SG financial uplift at ABR to address the resourcing gaps. Analysis for the years ahead with SPS obligations, as well as increase in official control delivery, show the budget deficit will grow exponentially in the years ahead.		
FSS Strategic Priority (s) (please select the most appropriate priority/s this issue aligns too)				
Public health and consumer protection				Y
Evolving and reforming the regulatory landscape				Y
Providing an effective public service for the people of Scotland				Y

Priority	VERY HIGH	Severity	VERY HIGH
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FSS Budget Allocation

ACTIONS IN PLACE	Quarter: 1 2026/27				
Actions	% Complete	RAG Status	Original Completion Date	Revised Completion Date	Action Owner
The new FSS Strategy whilst ambitious remains realistic in its expectation for delivery taking cognisance of budget pressures and resourcing gaps. FSS are in the process of agreeing 3 bespoke delivery plans in support of the strategy. These will be reviewed bi-annually by FBC to monitor progress.	80 60		Oct-26		
Monthly meetings are ongoing between FSS and SG Finance to monitor spend of resource budget allocation and discuss any in year ABR/SBR uplift requirements.	ongoing		Ongoing across the year		
FSS Board have agreed to write to Ministers post election to highlight significant budgetary pressures and impacts on official control delivery and SPS transition arrangements.	100 75		Jun-26		
SG have, at the Autumn Budget Review, agreed to transfer £190k capital and £323k revenue to support delivery of SPS and data & digital improvements.	75		Oct-26		
SG have agreed to support delivery of SAFER (year 2) via the invest to save fund. These monies are expected imminently.	90		Oct-26		



Strategic Issue No 2: Local Authority Food Law Delivery Model

Increasing pressures, including on finance and resource, for Local Authorities, has resulted in in some LAs being unable to deliver all food law activities required under Food Law.

Local Authority Food Law Delivery Model

Issue No: 2	Executive Lead: B Campbell, M McArthur	Version: 3.0	Date issue raised: Oct-22	Date issue last reviewed: Aug-26
Issue Title		Issue Description		
Local Authority Food Law Delivery Model		Full issue description Increasing pressures, including on finance and resource, for Local Authorities, has resulted in some LAs being unable to deliver all activities required under Food Law. In addition, the current framework is outdated and requires modernisation to ensure the continued protection of public health and the food and drink sector of Scotland can be provided the necessary levels of assurance for trade.		
		Escalation history The Public Sector collectively has failed to invest in the training and supply of professional resource, mainly due to funding cuts, therefore Local Authorities are unable to deliver food law requirements as set out in the Food Law Code of practice. The demand for professionally qualified staff within Local Authority Environmental Health and Public Analyst Services, therefore, far outstrips supply risking the ability to meet statutory food law intervention requirements.		
		The recommendation of the Strategic Risk Management forum is that risk 6 has effectively materialised and should be managed as an ongoing issue.		
		FSS Strategic Priority (s) (please select the most appropriate priority/s this issue aligns too)		
Public health and consumer protection				Y
Evolving and reforming the regulatory landscape				Y
Providing an effective public service for the people of Scotland				Y

Priority	VERY HIGH	Severity	VERY HIGH
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Local Authority Food Law Delivery Model

ACTIONS IN PLACE		Quarter: 1 2026/27			
Actions	% Complete	RAG Status	Original Completion Date	Revised Completion Date	Action Owner
Local Authority Delivery Division (LADD) The continued deterioration of LA capacity and capability in delivering food law interventions has resulted in a programme of reform (known as SAFER) to review the existing delivery model for food law, including the scope for charging, third party assurance and use of digital and data. Funding for 2025/26 has been provided through the SG Invest to Save Fund (ISF) and success of the programme is incumbent on the future funding for 2026/27, 2027/28 and 2028/29. While the Local Authority Delivery Division advanced several projects in 2025/26, a prioritisation exercise to support FSS Strategic Priorities within SAFER and SPS resulted in much of this work being placed on hold. The team is now reassessing and redefining priorities, with a view to resuming elements of this work through 2026/2027. Projects for 2026/2027 include: Review of the Food Law Code of Practice Approved Establishments Project to address issues raised during audit and to improve consistency. Redefine Local Authority Engagement	10		2025/26	2028/29	M McArthur
LADD Short-term: • Work has commenced to review the Food Law Code of Practice with a view to issuing for formal consultation during Q4 of 2026/2027. Completion of this work will be dependent on availability of legal input. • Approved Establishments – Official Control Verification (OCV) Guidance has been reviewed and will be issued (July) in draft form to allow for a 12-week informal consultation with all LAs. • LA Engagement Strategy – work due to commence during Q2.			Mar-27 Mar-27 Mar-27		MMcA MMcA MMcA

Local Authority Food Law Delivery Model

ACTIONS IN PLACE		Quarter: 1 2026/27				
Actions		% Complete	RAG Status	Original Completion Date	Revised Completion Date	Action Owner
SAFER Medium-term: A public service reform programme, SAFER, has been created to modernisation and reform food law delivery in Scotland. SAFER is FSS strategic response to the risks and issues that surround the food law delivery model in Scotland and supports Ministerial commitments to wider public service reform. Strategic intent to secure improved public health outcomes through model review, developing and embracing new and more efficient ways of working, through better use of data and digital technologies, and ensuring financial sustainability. Tranche 1 of the programme has commenced with 3 programme boards having now taken place, Key highlights to date include agreement on scope, funding, timelines, milestones, research and evidence and staffing. Outcomes : • Undertake research and evidence analysis strategy • Options Analysis of food law delivery and funding model. • Regulatory Frameworks are scoped out and developed. • Data and Digital frameworks are scoped out and developed. • Agree future food law delivery and funding model		50		Mar-27		BC
SAFER Long-term: • Tranche 2 - Realisation of Tranche 1 outcomes and implementation of a new TOM for food Law delivery in Scotland.		0		Mar-29		BC



Strategic Issue No: 3

CYBER SECURITY BREACH

FSS's ambition to become a data-driven and digitally enabled regulator increases its reliance on digital technologies, data and interconnected systems, thereby increasing exposure to cyber threats. Failure to maintain effective cyber security controls and capabilities could result in the compromise of information assets, disruption to critical services, regulatory failure and reputational damage.

The focus on transformation in FSS corporate, data and digital strategies, positions FSS as a data driven and digitally enabled regulator but also increases the organisation's exposure to cyber threats. As such, we must ensure that we have appropriate cyber security protocols to provide us with greater confidence in navigating the potential cyber threats that we may face in the future.

Cyber Security Breach

Issue No: 3	Executive Lead: R Simson	Version: 1.0	Date issue raised: Aug-25	Date issue last reviewed: Aug-26
Issue Title		Issue Description		
Cyber Security Breach		Full issue description FSS's ambition to become a data-driven and digitally enabled regulator increases its reliance on digital technologies, data and interconnected systems, thereby increasing exposure to cyber threats. Failure to maintain effective cyber security controls and capabilities could result in the compromise of information assets, disruption to critical services, regulatory failure and reputational damage. The focus on transformation in FSS corporate, data and digital strategies, positions FSS as a data driven and digitally enabled regulator but also increases the organisation's exposure to cyber threats. As such, we must ensure that we have appropriate cyber security protocols to provide us with greater confidence in navigating the potential cyber threats that we may face in the future.		
		Escalation history In September 2024 ARC discussed the risks presented by a Cyber-attack across FSS, at which time they felt the risk was being properly managed and mitigated by FSS. As such the risk remained stable within the EMT level 2 risk register. It was agreed at SRMF on 13 August 2025 to re-table the Cyber Security risk to ARC where it was agreed as a strategic issue.		
		FSS Strategic Priority (s) (please select the most appropriate priority/s this issue aligns too)		
		Public health and consumer protection		N
Evolving and reforming the regulatory landscape				N
Providing an effective public service for the people of Scotland				Y

Priority	HIGH	Severity	HIGH
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Cyber Security Breach

ACTIONS IN PLACE	Quarter: 1 2026/27				
Actions	% Complete	RAG Status	Original Completion Date	Revised Completion Date	Action Owner
Enhance FSS cybersecurity posture - Working with HEFESTIS to implement a comprehensive and structured cyber risk management program that implements the Chief Information Security Officer (CISO) -share program at FSS. The program will review and assess FSS cyber maturity and risk posture for 12 months – August 2025 to March 2027. - Monitor and report on number of email phishing attempts and provide appropriate training and staff awareness - FSS annual Cyber Essentials reaccreditation by March 2026 - spill into April 2026 - Registered interest to pilot and subsequently use the new Scottish Government cyber security procurement tool – ‘Supply 25’ for supplier assurance evaluation and management. Not yet onboarded.	50 45		Dec-26	Mar-27	T Daspan
Protect sensitive data - Monitor and report on FSS applications to ensure FSS systems and data are protected - Work with SG iTECS to ensure that all FSS digital assets have updated antivirus software and receive regular security patches - Collaborate with system owners to map out and conduct entitlement review of FSS applications - Develop a data warehouse on FSS Azure cloud environment to host FSS key databases for enhanced data analysis/reporting dashboards - Monitor and manage 3rd party penetration testing of key FSS bespoke systems.	60		Dec-26		T Daspan A Robins
Strengthen incident response and recovery capabilities - Review and enhance FSS incident response plan - Participate in Scottish Cyber Coordination Centre (SC3) events and training programme to implement lessons learned in FSS and improve FSS Cybersecurity posture - Implement lessons learned from FSS 2025 tabletop cybersecurity exercise.	70		Apr-26	Sept-26	T Daspan C Ikejiofor



Strategic Issue 4:

PUBLIC SERVICE REFORM

A Public Service Reform (PSR) Strategy was published in 2025 and set out a vision for all public services to transform and make efficiencies and improvements to deliver the best services for the people of Scotland.

Public Service Reform

Issue No: 4	Executive Lead: G McEwan	Version: 1.0	Date issue raised: May-26	Date issue last reviewed: Aug-26
Issue Title		Issue Description		
Challenges with resource to support delivery of the PSR Strategy		Full issue description: The successful delivery of the Public Service Reform Strategy is dependent on adequate organisational capacity, hunger and a willingness to exploit any and all opportunities. Current resource pressures within FSS remain acute and require careful consideration to ensure a balance between core service delivery and enabling service improvements.		
		Escalation history: It was agreed at the 03/06/26 ARC that our PSR strategic risk has now materialised and should be progressed as a strategic issue.		
		FSS Strategic Priority (s) (please select the most appropriate priority/s this issue aligns too)		
		Public health and consumer protection		
Evolving and reforming the regulatory landscape		Y		
Providing an effective public service for the people of Scotland		Y		

Priority	HIGH	Severity	HIGH
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Public Service Reform

ACTIONS IN PLACE	Quarter: 1 2026/27				
Actions	% Complete	RAG Status	Original Completion Date	Revised Completion Date	Action Owner
The SAFER programme of work aligns closely to PSR principles and is covered in detail elsewhere with an established Programme Board having conveyed in October 2025. SG have agreed to support delivery of SAFER (year 2) via the invest to save fund. These monies are expected imminently. Invest to save monies have been approved sought for this current financial year. In the interim DG Communities have supported progress of SAFER with a 1 Million contribution.	30		Apr-28		B Campbell
A key driver of PSR is improved data sharing and enhanced digitally enabled services across the Public Sector. FSS has strengthened its digital capability over the last 18 months with a view to making further investment where possible in the financial years 2025-27. A new Head of Data and Digital has been appointed (21/04/26) and is in the process of taking stock of FSS including a full organisational assessment of data and digital roles and infrastructure. This has resulted is likely to result in a new bespoke Data and Digital division.	70		Oct-27		R Simpson