

Food Standards Scotland

Strategic Risk and Issue Register Report

1 Purpose of the paper

- 1.1 To provide the Audit and Risk Committee (ARC) with an update on the Quarter 3 2024/25 Strategic Risk and Issue Registers.
- 1.2 The ARC is asked to:
- **Note and review** the updated Q3 2024/25 Strategic Risk Register (**Annex A**) which explains the risks in more detail. All changes are marked in red.
 - **Note and agree** the decrease in score for risk 10 'Official Control Delivery' from 150 to 100.
 - **Note and review** the updated Q3 2024/25 Strategic Issue Register (**Annex B**). All changes are marked in red.
 - **Note and agree** the increase to priority and severity of issue 3 'External Policy Pressures' from high to very high.

2 Background


- 2.1 Risks and issues continue to be discussed at Directorate Level and the Strategy Forum for proposed escalation with subsequent review at the Strategic Risk Management Forum (SRMF), before submission to the ARC. This is in line with the FSS Risk Management Policy and Guidance.

3 Summary: Strategic Risk Register

- 3.1 The Strategic Risk Register was last reviewed by the ARC 27 November 2024, with the following noted:
- **Agreed** the de-escalation of Strategic Risk 9 Shared Services Programme. This risk was originally a high strategic risk due to the uncertainty around the move to Oracle Cloud. The migration took place 01/10/2024 and FSS HR and Finance teams are working through the anticipated issues. It was agreed to be managed as an issue on the Corporate Services divisional issue register.
- 3.2 The SRMF met 17 February 2025 where senior managers, subject matter experts and risk owners discussed risks and issues across FSS. The group discussed and agreed the following movement in score for the reporting period which is noted below (**para. 3.3**).
- 3.3 **Risk 10 (Figure 1)**. ARC to note and agree the decrease in risk score from 150 to 100. The majority of the mitigation actions for meat delivery have moved to completed or near completion which has influenced the decrease in score. The mitigation actions for Feed have regressed with another Senior Feed Officer leaving their role. FSS have no senior technical or field operational support to undertake high risk inspections. This is also the 4th staff member to exit the team

within the last year. As sole Competent Authority in Scotland for Feed, it puts FSS at a higher risk of failing to deliver its statutory Official Control functions as well as contribute to critical work on feed trials, Local Authority performance, supervision/line management of existing feed officers and any response to an incident. Action has already been taken with the Operational Delivery team due to recruit for 2 Senior Feed Officers imminently and explore alternative measures to reduce this resource gap in the interim period; recent management changes to support feed delivery will also remain in place. The mitigation actions will be reviewed in the next quarter, which may result in a further change in score.

Figure 1: Risk 10 Official Control Delivery



Risk description	Score / trend
<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 OVs and MHIs. Since EU exit the ability to recruit OVs 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 its 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>	<div style="text-align: center;">  </div> <p style="text-align: center; color: red;">4*25 = 100</p> <p style="text-align: center;">(was 3*50 = 150)</p>

4 Summary: Strategic Issue Register

- 4.1** Post discussion with issue owners, relevant subject matter experts and the SRMF, the following changes are noted below (**para 4.2**).
- 4.2 Issue 3 (Figure 2).** ARC to note and agree the increase in priority and severity to very high as the majority of the work FSS carries out is driven by UK Government and external pressures. The controls in place listed on slide 13

(**Annex B**) are the priority items but there are a variety of other important policy matters to consider, particularly around regulated products and risk analysis.

Figure 2: Issue 3 External Policy Pressures

Issue description	Score	
	Priority	Severity
The legacy of the UK Government's post-EU Exit deregulatory statute book will continue to impact FSS. The policy and regulatory environment is now significantly more complex due to the interaction of the UK Internal Market Act, UK Common Frameworks, the Retained EU Law Act, and a potential future UK-EU SPS/Veterinary Agreement, outlined in the Labour party manifesto, may bring additional change. FSS's ability to remain fully engaged across UKG led policy initiatives within existing resource constraints will remain challenging, with consequent risks around GB/UK divergence, impact on delivery of core statutory obligations, and staff wellbeing, should work on specific areas for reform be ramped up by UKG.		
	<p style="text-align: center;">Very High</p> <p style="text-align: center;"></p> <p style="text-align: center;">(Was: High)</p>	<p style="text-align: center;">Very High</p> <p style="text-align: center;"></p> <p style="text-align: center;">(Was: High)</p>

5 Conclusion

5.1 The ARC is asked to

- **Note and review** the updated Q3 2024/25 Strategic Risk Register (**Annex A**) which explains the risks in more detail. All changes are marked in red.
- **Note and agree** the decrease in score for risk 10 'Official Control Delivery' from 150 to 100.
- **Note and review** the updated Q3 2024/25 Strategic Issue Register (**Annex B**). All changes are marked in red.
- **Note and agree** the increase to priority and severity of issue 3 'External Policy Pressures' from high to very high.

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 19/02/25

Annex A – Strategic Risk Register – see attached

Annex B – Strategic Issue Register – see attached