

Final Report from the Science Council Working Group On Risk And Uncertainty and FSA Response

Report by Steve Wearne

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Summary

1. The Board is asked to:
 - **consider** the Working Group's report;
 - **agree** that the best practice principles are consistent with and provide a basis for the FSA's risk analysis framework; and
 - **agree** the proposed FSA response to the recommendations.

Introduction

2. This paper:
 - presents the final report and recommendations from the FSA Science Council's Working Group on Risk and Uncertainty, at Annex 1;
 - sets out the Executive's analysis of the Working Group's recommendations together with our proposed response to these, including which actions we see as priorities, with targets and deadlines.

Working Group report

3. The Science Council Working Group on Risk and Uncertainty was established to answer the question set by the FSA in June 2016: *'What does the Council advise to be best practice in establishing and communicating risk and uncertainty?'*. The Working Group's full report is at Annex 1.
4. The Working Group noted that the FSA is already following globally recognised risk analysis frameworks (notably the Codex Principles) but agreed there was a need to draw together an overarching FSA framework to show how it does this and demonstrate consistency in approach across different types of risks.
5. The Working Group has produced:
 - Fifteen principles on best practice on establishing and communicating risk and uncertainty which cover the overall process and governance of risk analysis and of its component parts (risk assessment, risk management and risk communication);

- Seventeen high-level recommendations, for putting these principles into practice and on opportunities for continuous improvement.

Discussion

Executive's analysis of the Working Group's recommendations

6. The Executive welcomes the best practice principles produced by the Working Group. We consider they have the benefit of:
 - amplifying the globally recognised frameworks (notably the Codex Principles) which the FSA is already following;
 - being tailored specifically to the FSA;
 - having been developed with input from a wide range of FSA staff working on risk analysis and with input from the FSA's Scientific Advisory Committees.
7. The Working Group's 17 recommendations are by nature high-level due to the strategic nature of the Science Council's remit. The Executive considers the recommendations are well-founded. We expect their implementation will be resource neutral and can be through existing FSA workstreams, as they are all covered in things we are already doing, or planning.
8. Our immediate priorities focus on preparing for EU Exit and this work provides the main vehicle for implementing the Working Group's recommendations.

Executive's proposed response to the Working Group's recommendations

9. The FSA should welcome and accept the Working Group's 17 recommendations.
10. We consider the immediate priorities are to reflect those recommendations that map onto and feed into our plans to develop risk analysis approaches and capability in preparation for EU Exit.
11. Our detailed proposal for taking forward the recommendations is described below in more detail under five priority work areas outlined in the September 2018 Board paper on Risk Analysis: approach to risk analysis; organisational design; capacity and capability; risk communication; governance and assurance. All of the 17 recommendations are covered in these proposals.
12. The Executive will provide a report to the Science Council on implementation of the FSA's response to the recommendations within 12 months.

Approach to risk analysis

13. The Board papers on Risk Analysis (18-09-09¹; 18-12-11) set out the developments we are making to risk analysis in the FSA as part of the EU Exit

¹ https://www.food.gov.uk/sites/default/files/media/document/fsa-18-09-09-risk-analysis-process-governance-communication_1.pdf; <https://www.food.gov.uk/sites/default/files/media/document/fsa-18-09-09-board-risk-analysis-sep-18-amended-final.pdf>

programme. The approaches we are taking to evolve risk analysis processes reflect the Working Group's recommendations, as follows:

- The best practice principles for establishing and communicating risk and uncertainty, which have been drawn from international normative texts and amplified by the Working Group, provide the structure for articulating our framework for risk analysis [Recommendation 1];
 - We will invite input from the FSA's Scientific Advisory Committees as this framework develops [Recommendations 2, 7 and 17];
 - The new approach to risk analysis is on track to deliver by March 2019. Implementation of the framework will be subject to ongoing review and adaptation as necessary to ensure it is embedded effectively in our post-EU Exit approaches and processes. We will ensure that the principles and the way they are implemented are kept under review [Recommendation 5];
 - The recommendation on an annual workshop with advisory committees will be picked up in our plans for review [Recommendation 7].
14. The Working Group's recommendation for the FSA to consider whether the principles for health risks might apply or be adaptable to other types of risks such as those related to food authenticity and fraud, is not essential for day one of EU Exit [Recommendation 8].
15. This is therefore considered a lower priority and will be picked up later as part of the work to consolidate and build further on our risk analysis approach, in light of experience and developments post EU Exit. We will do this in close collaboration with activities already underway to strengthen links between the National Food Crime Unit and the wider FSA, especially in surveillance, horizon scanning and data science. This work with the NFCU is referred to in the Board paper on capability and assurance (18-12-09), as it addresses recommendations from that Working Group.

Organisational design

16. A key principle for the governance of risk analysis is that there should be a functional separation of risk assessment and risk management. As outlined in the September Board paper on risk analysis (18-09-09) we are currently reviewing our organisational design to better position the FSA for a post-EU Exit world and this work includes the clear functional separation of risk assessment and risk management.

17. These changes to our organisational design, and implementation of the risk analysis framework, are on track to deliver by March 2019 and will:
- increase the frequency and depth of communication and iteration between risk assessors and risk managers [Recommendation 4];
 - help ensure activities relating to risk analysis are fully joined up across the FSA [Recommendation 7];
 - provide clear check points and lead roles in terms of assuring that the process is working as it should [Recommendation 3].

Capacity and capability for risk assessment and risk management

18. The September paper on risk analysis (18-09-09) outlined our plans to bring in relevant skills and expertise that are currently underrepresented internally; and on development of training to build and maintain capability. It also outlined plans for reviewing the structure, roles and governance of our Scientific Advisory Committees (SACs) and other inputs from external expertise and how these work together, to ensure that we can continue to access the science we need to support risk assessment. An update on our plans for the SACs is provided in the December paper on Risk Analysis (18-12-11).
19. The process of recruiting 36 additional full time equivalent staff to our science and policy teams is well underway and this will bring in relevant skills and expertise that are currently underrepresented internally. We are also developing a programme of training to build and maintain capability.
20. These plans for enhancing capacity and capability will address the Working Group's recommendation on the need for: timely adoption of new innovations; maintaining a high level of technical capability and competence; and for capacity to monitor and adopt state-of-the-art approaches to risk analysis [Recommendation 6].

Risk communication

21. The Working Group's recommendations 9 to 17 provide high-level recommendations for developing best practice approaches to communicating risk and uncertainty.
22. Our approaches to risk communication are being informed by:
- the Working Group's principles and recommendations;
 - the Advisory Committee on Social Science's (ACSS) Risk Communication Working Group, which has been established to assist the FSA in responding to and implementing the report's

recommendations and to reflect them in a practical risk communication framework [Recommendations 9 and 17].

23. The activities we are taking forward as part of the development of a practical risk communication framework, which forms part of the overarching framework for risk analysis, reflect the Working Group's recommendations as follows:

- Our new risk analysis framework allows for evidence from social science as to the potential emotional and value-driven responses to the risk management decision, alongside evidence of consumer preferences and acceptability, to form part of the 'other legitimate factors' presented in support of risk management and communication decisions [Recommendation 10].
- The risk communication framework will include practical/situational examples of risk communications tested with audiences [Recommendation 11].
- We have plans and budget in place to extend further our programme for testing approaches to risk communication to inform our communication functions at a strategic level [Recommendation 12].
- We will continue to consult with audiences on planned communications [Recommendation 13].
- We are engaged with and drawing on other organisation's approaches and tools (including those recommended by the Working Group, government frameworks and the academic literature) in considering our approach [Recommendation 14].
- Our approach is informed by, and will continue to be informed by, our evidence base on trust. For example, we have recently published a literature review and report from qualitative research with consumers on trust in the FSA and the food system² [Recommendation 15]
- FSA risk communication workstreams are integrated at senior level across the FSA. The risk communication framework will provide for training for staff involved in risk communications to ensure consistency of approach [Recommendation 16].
- The ACSS Risk Communication Working Group recently discussed the Science Council's principles and recommendations and their commentary on these has been published at www.acss.food.gov.uk. The ACSS welcomed the Council principles and recommendations and advised on a number of actions which will help the FSA to operationalise them [Recommendation 17].

Governance and assurance

² <https://www.food.gov.uk/research/research-projects/trust-in-a-changing-world>

24. The September paper on Risk Analysis (18-09-09) proposed plans for development of appropriate assurance mechanisms that assure the outputs from risk analysis, their timeliness and their quality.
25. Further details on the FSA's proposals for principles that govern each stage of risk analysis and for a framework for science assurance are covered in other papers for this meeting (18-12-09; 18-12-11).
26. These plans draw on and reflect the Working Group's recommendations, in particular to develop an appropriate form of documenting compliance with the overarching approach for establishing risk and certainty to ensure operational transparency, consistency and quality management [Recommendation 3]. The risk analysis process provides clear check points and lead roles in terms of assuring that the process is working as it should. This will function as a way of documenting compliance with the overarching approach.

Conclusions

27. The Board is asked to:
 - **consider** the Working Group's report;
 - **agree** that the best practice principles are consistent with and provide a basis for the FSA's risk analysis framework; and
 - **agree** the proposed FSA response to the recommendations.

Annex 1 Final report from the Science Council Working Group on Risk and Uncertainty

This report is provided separately