

Food crime prevention strategic plan 2024-27

A model for the identification, analysis and implementation of measures to reduce or prevent the occurrence or re-occurrence of food crime and the identification and mitigation of related future food crime risks in the Scottish food and feed chains.

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At Food Standards Scotland We have a unique role, working independently of Ministers and industry to provide advice which is impartial, and based on robust science and data.

Our remit covers all aspects of the food chain which can impact on public health – aiming to protect consumers from food safety risks and promote healthy eating.

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Abbreviations

ESRG	External Stakeholder Reference Group
FBO	Food Business Operator
FSA	Food Standards Agency
FSS	Food Standards Scotland
LAs	Local Authorities
RCA	Root Cause Analysis
SFCIU	Scottish Food Crime and Incidents Unit
TTCG	Tactical and Tasking Co-ordination Group

1. Introduction

Food Standards Scotland's [Strategy to 2026](#) sets out a vision for a safe, healthy and sustainable food environment that benefits and protects the health and well-being of everyone in Scotland. Three of the priority outcomes are that Food is Safe and Authentic, responsible food businesses are able to thrive and FSS is trusted and influential.

Food crime prevention is crucial to this strategy. Its application is the attempt to prevent, reduce and deter crime and criminals impacting on the food supply chain. It creates the opportunity to develop an approach to food crime and criminals which encourages an emphasis on proactivity towards identifying vulnerabilities and learning so as to reduce crime occurrence or re-occurrence. Part of this will be identifying areas for improvement through analysis of information from a variety of sources that then allows preventative measures to be established and implemented, enabling food businesses to consider target hardening and other techniques to thrive.

FSS long term goal is to have a process that will enable effective and efficient analysis of information which will inform FSS and partner proactive prevention activity with an emphasis on protecting consumers and helping food businesses reduce their vulnerability to food crime.

2. The importance of food crime prevention in the delivery of FSS strategic objectives

FSS is intelligence led in its approach to tackling food crime, focussing on a model built around the assessment and management of risk. It continues to put evidence first and, as with its guiding principles and values, FSS will ensure work is underpinned by robust data, establishment of trust ensuring regulatory objectives and decision making is transparent and that actions are consistent and timely. FSS will give advice and recommendations alongside an evidence base to enable those impacted to understand the issue.

FSS will work closely with industry in a collaborative manner to ensure risks and mitigations can be identified, shared and implemented. It is important to identify learning from criminality accompanied by horizon scanning with a focus on identifying solutions to prevent food crime from occurring or its reoccurrence. This information will be captured and shared with stakeholders and industry to develop an information sharing ethos with the ultimate aim of preventing crime.

3. What is food crime prevention?

Food crime prevention is the process of making plans and preparations and the implementation of these plans to prevent crime or avoid its re-occurrence. For FSS, it is a term used to identify effective long-term preventative actions to help mitigate occurrence and/or recurrence of food crime to protect consumers and food businesses.

4. Aim and scope of the strategy

This strategy sets out a framework for the analysis of criminal intelligence, information and data in relation to food crime, with the aim of identifying effective long term preventative actions. An integral part of this is the sharing of information and learning between FSS, industry and key stakeholders.

FSS will look to identify potential issues through horizon scanning and intelligence capture, coupled with identifying common themes, best practice and lessons learned from criminality as well as utilising information and intelligence shared by industry. This strategy will take cognisance of other food crime prevention work elsewhere in the UK and around the world to help ensure the furthest reaching data sets and prevention activity feed into FSS analysis and preventative action.

It is important to understand how the use of our data can be optimised across industry to prevent crime. There is a need for FSS to develop more proactive engagement and interaction with industry, in particular, through communication and information sharing.

5. Developing a food crime prevention model for Scotland

FSS and key stakeholders, including industry, academia, Local Authorities (LAs) and other regulators and law enforcement partners hold crucial information which can be used to help identify specific opportunities, issues and wider trends. With appropriate analysis, this information can be developed and used to establish preventative measures and identify future challenges that could be mitigated.

Analysis of the available data sources, whether internal or external, will be reviewed under the governance of the SFCIU Food Crime Tactical Tasking and Co-ordination Group (TTCG). The TTCG will consider and prioritise crime prevention activity in line with the current FSS food crime control strategy and, where required, in response to emerging threats/risks. The TTCG will consider and analyse data to establish mitigating opportunities and develop a food crime prevention approach to benefit the wider food and feed sectors.

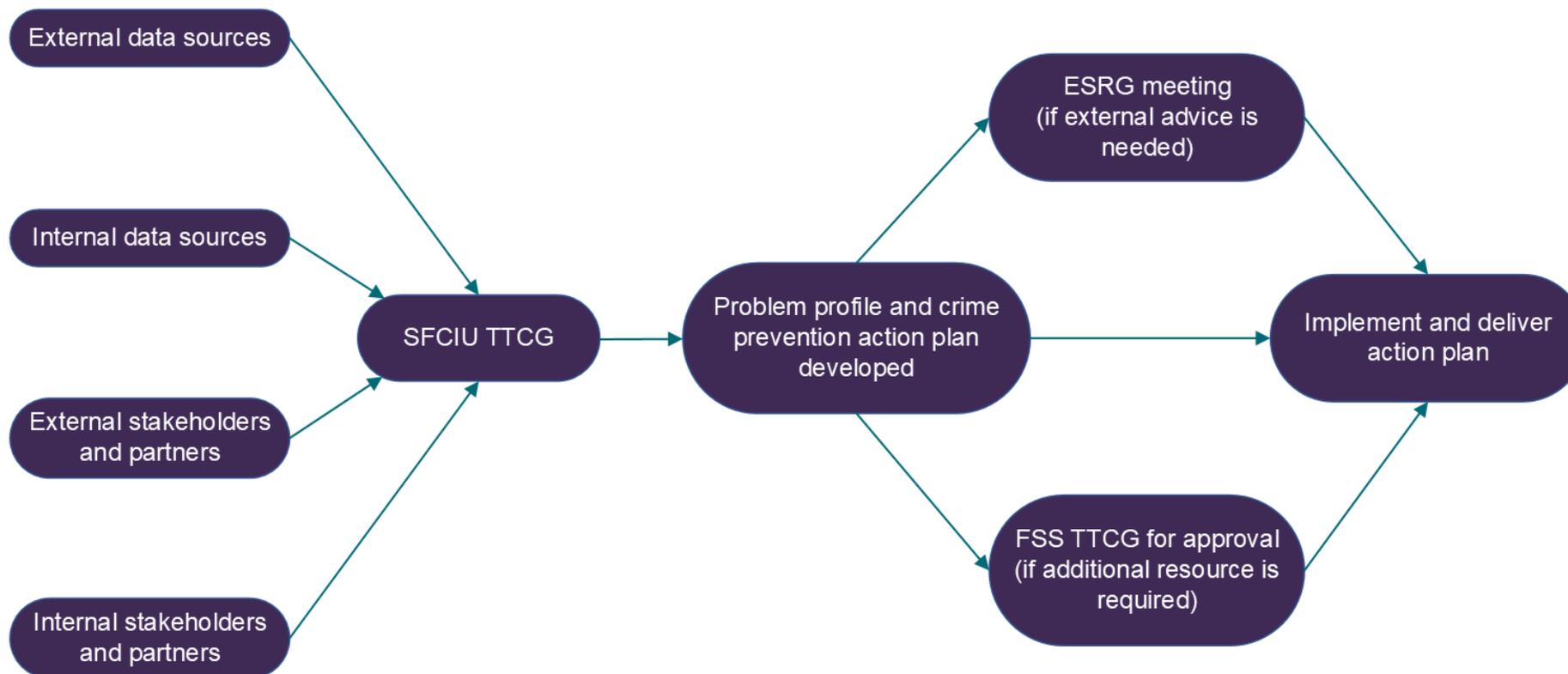
In practical terms, the SFCIU TTCG will consider and authorise crime prevention activity based on recommendations contained within food crime problem profiles which the group has commissioned, the FSS food crime control strategy and related delivery plan or other food crime prevention profile reports submitted to the TTCG for consideration. All agreed activity will be supported by an approved individual food crime prevention plan. Where issues are of organisational significance, but can be resourced and actioned by the SFCIU, these may be highlighted to the FSS TTCG for information only, where appropriate. Where additional funding or non SFCIU resources are required to deliver the food crime prevention activity, this will be referred to the FSS TTCG for consideration and approval.

Where appropriate, plans will be shared with an External Stakeholder Reference Group (ESRG) where continuous improvement learning can be shared.

The ESRG will also provide the governance route for industry and stakeholders to share with FSS their data, issues and recommendations in respect of the prevention of food and feed crime.

FSS will utilise a number of routes to share food crime prevention learning with key stakeholders including meetings/events and a dedicated section on the FSS website.

Food crime prevention model



Information from external and internal data sources, stakeholders and partners feeds into the Scottish Food Crime and Incidents Unit (SFCIU) and will be analysed under the governance of the Food Crime Tactical and Tasking Co-ordination Group (TTCG). Based on this information, the group develops a problem profile and crime prevention plan. At this point, if external advice is needed, a meeting will then be held with the External Stakeholder Reference Group (ESRG). If additional resource is needed, the matter will be referred to the FSS TTCG. Once these are complete, the plan is implemented.

6. Collaboration and partnership working

The vision for food crime prevention described by this strategy cannot be delivered by FSS in isolation. Effective communication and collaboration with external stakeholders including industry, academia, LAs and other law enforcement partners is critical to its success.

FSS will continue to build on the trust and strong partnerships that already exist with stakeholders to support the efficient and effective sharing of information and data with the ultimate aim of supporting industry in food crime prevention in order to protect consumers.

FSS will look to establish an ESRG to enable the two way sharing of information with the combined purpose of identifying continuous improvement.

7. FSS strategic objectives

The ultimate FSS objective is to work collaboratively with key stakeholders to reduce vulnerability to food crime across the supply chain by identifying trends and understanding and effectively assessing risk. Such activity will support the food industry by creating opportunities to increase authenticity and improve fraud resilience, with the ultimate aim of protecting consumers.

Goal 1: Identifying Stakeholders

Outcomes: Food is safe and authentic, responsible food business are enabled to thrive, FSS is trusted and influential

To achieve this we will:

- identify stakeholders who can assist in food crime prevention and develop collaborative arrangements for both the sharing of information and data and the participation in planning and delivery of crime prevention activity

Goal 2: Improve data analysis processes for review of data to identify trends and aid food crime prevention

Outcomes: Food is safe and authentic, responsible food business are enabled to thrive, FSS is trusted and influential.

To achieve this we will:

- review existing reporting mechanisms and information and intelligence channels to make sure they are fit for purpose
- explore digital solutions to help aid data capture and analysis in order to maximise its potential.
- develop innovative practices to identify and monitor food crime trends and detect risks.
- link datasets together to enhance our evidence base
- enhance data quality and availability

- strengthen our digital and data capability, so that we can be a “data rich” organisation in terms of food crime.

Goal 3: Improve stakeholder and consumer engagement

Outcomes: Food is safe and authentic, responsible food business are enabled to thrive, FSS is trusted and influential

To achieve this we will:

- raise awareness of food crime in general, the work of the unit and the existence of the Scottish Food Crime Hotline amongst stakeholders, in order to improve opportunities for information and intelligence capture that can feed into food crime prevention planning.
- raise awareness, consult and gather stakeholder and consumer views on food crime priorities and food crime prevention, highlighting why this work is important and how it can help the Scottish economy to flourish, how it can protect businesses and consumer health and their other interests.
- develop a constructive feedback loop process to improve information sharing between FSS and stakeholders around food crime prevention.
- work collaboratively with key stakeholders to help implement efficient and effective root cause analysis for use with those Food Business Operators who have been the victim of food crime.
- creation of a ESG along with terms of reference

Goal 4: Introduce communication channels between FSS and Industry for sharing of lessons learned and best practice

Outcomes: Food is safe and authentic, responsible food business are enabled to thrive, FSS is trusted and influential.

To achieve this we will:

- research current internal and external sharing platforms
- research new and innovative information sharing platforms
- carry out further considerations in relation to having a technological solution to share information

Goal 5: Develop a collaborative approach to food crime prevention with the FSA, wider UK stakeholders and international partners to capture consistent data, identify food crime trends and emerging threats in order to deliver collaborative food crime prevention activity.

Outcomes: Food is safe and authentic, responsible food business are enabled to thrive, FSS is trusted and influential.

To achieve this we will:

- develop consistent RCA and other data categorisation in relation to food crime to allow efficient and effective analysis
- ensure regular engagement with FSA and other stakeholders/partners in relation to sharing information and intelligence relevant to food crime in order to plan and deliver collaborative food crime prevention activity.
- ensure that a current UK food crime strategic assessment is developed, published and used as foundation for food crime prevention planning and activity.
- ensure appropriate and timely FSS involvement in incident prevention work streams to help shape future developments that benefit and protect Scottish food businesses and consumers.
- ensure regular engagement with international partners, such as members of the Global Alliance on Food Crime, to share best practice in relation to crime prevention, share information and intelligence on trends and emerging food crime threats, in order to design and implement effective crime prevention activity