

Incident Management Plan for Non-Routine Incidents

Incident Management Plan: Chief Executive's foreword

Reacting swiftly and effectively to food and feed incidents is a key part of the Food Standards Agency objectives.

Document control

Ownership and maintenance of this plan and internal supporting documentation is the responsibility of the Operational Resilience Team, part of the Incidents and Resilience Unit at the Food Standards Agency. This plan is reviewed biannually.

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Chief Executive's foreword

Delivering the Food Standards Agency's mission requires more than strong regulation; it depends on our ability to anticipate, withstand and respond effectively to disruption. In an operating environment characterised by increasing complexity, interconnected risks and heightened expectations, organisational resilience is a core strategic capability.

This Incident Management Plan for Non-Routine Incidents underpins that capability. It provides a clear framework for leadership, decision making and assurance when the Agency faces significant incidents or crises that may threaten our objectives, reputation or ability to operate effectively. The Plan supports a structured, proportionate response, aligns with cross government standards and is designed to enable well governed action.

Continuous learning is integral to our approach in revising our plans. Insights from incidents, exercises and formal reviews have been embedded within this version of the Plan, ensuring that lessons are translated into tangible improvements. This cycle of learning and adaptation strengthens our readiness and supports continuous alignment with best practice and evolving risk. The Plan has been reinforced to support the broader risk horizon and has been successfully applied as a framework for responding to those wider disruptive events, demonstrating its value as a flexible framework and reflects our whole organisation approach to risk and resilience, ensuring preparedness for scenarios that extend beyond our statutory responsibilities.

Effective incident management is a shared organisational responsibility and a key enabler of confidence, both internally and externally. This Plan provides the foundation for that responsibility, supported by training, exercising and collaboration across the Agency and with partners.

Together, these arrangements ensure that the Food Standards Agency is well positioned to manage non routine incidents in a way that safeguards public trust, supports delivery of our strategic objectives and strengthens long-term organisational resilience.

Katie Pettifer
Chief Executive
Food Standards Agency

Incident Management Plan: aim, objectives, scope and purpose of plan

This Incident Management Plan (IMP) outlines the FSA's strategic, tactical and operational arrangements in response to non-routine food and/or feed-related incidents.

Aim

1.1 This document sets out the framework for the Food Standard Agency's (FSA) response to all non-routine incidents, crisis and emergencies. The "Plan" defines the FSA's response arrangements to those non-routine incidents where the FSA will takes responsibility, either by statutory requirement (as set out in the [Food Law Code of Practice](#)), and/or in its role of Lead Government Department (LGD), following an actual or potential threat to the safety, quality or integrity of the food and/or animal feed chain, or as a supporting department. This may also include outbreaks of animal disease or a business continuity event.

1.2 The strategic and tactical command structures and key principles set out in this plan will be followed for all incidents, crisis and emergencies events, including those that fall outside of our remit, but that may require the FSA's strategic and tactical measures to aid the FSA response and/or recovery of that emergency event. For example, a non-routine policy or trade issue; or a business continuity incident that has the potential to disrupt our business; or a pandemic (where for example a 2-fold response is required; such as food safety advice and the management of the FSA's own response).

Objectives

1.3 This plan provides a framework to meet the following objectives that are required across government:

- ensure robust command and control procedures are in place that align to [The Amber Book – Managing Crisis in Central Government](#) (previously known as UK's Concept of Operations (CONOPs))
- ensure effective communication across all stakeholders, strategic and tactical responses are consistent and co-ordinated
- escalation and de-escalation mechanisms and criteria are clearly defined
- the ability to determine the key stakeholders (internal and external) and resources required to prepare, respond and recover from an effective response

Scope and purpose of Plan

1.4 This plan summarises those key activities to be undertaken during the FSA's response to a non-routine incident or emergency. The plan sets out the strategic and tactical command and control structure and procedures for responding to and managing crisis management issues. As

well as food and feed safety incidents, these may also include an animal disease outbreak, which are led by other government departments but require a number of interventions by FSA in the course of the response or a business continuity event that impacts on the delivery of our business or falls outside of the FSA's remit but may still require a tactical and/or strategic response. The framework is followed by all FSA offices across England, Wales and Northern Ireland.

1.5 The detailed processes which support this IMP are set out in a series of internal Standard Operating Procedures (SOP) and guidance.

1.6 Routine incidents and outbreaks are not within the scope of this plan. They are dealt with using the FSA's internal Routine Incident Management Plan and current communicable disease outbreak management guidance. The [UK Health and Security Agency \(UKHSA\) \(footnote 1\)](#) is responsible for health protection operations as part of its remit.

1.7 A [memorandum of understanding with Food Standards Scotland \(FSS\)](#) is in place to ensure liaison arrangements continue to deliver a co-ordinated incident handling response across Scotland, England, Northern Ireland and Wales. [The Food Standards Scotland Incident Management Framework](#) defines how FSS led incidents are managed. This document will be used should FSS lead a non-routine food/feed incident.

1. The UK Health Security Agency (UKHSA) will be responsible for planning, preventing and responding to external health threats, and providing intellectual, scientific and operational leadership at national and local level, as well as on the global stage. UKHSA will ensure the nation can respond quickly and at greater scale to deal with pandemics and future threats.

Incident Management Plan: Definition of an incident

This plan sets out the strategic, tactical, and operational command and control structure and procedures for managing food and feed safety incident.

2.1 The Food Standards Agency (FSA) defines an incident as:

“any event where, based on the information available, there are concerns about actual or suspected threats to the safety, quality or integrity of food and/or feed that could require intervention to protect public health and/or consumers' interests. Quality should be considered to include food standards, authenticity and composition.”

2.2 The following section covers the alerting process for the FSA to respond to an incident, as well as the activation and escalation process which ensures the incident is managed at the appropriate level of authority.

Detection of an incident

2.3 Initial incident detection may originate from many sources. An incident may be notified by an internal division, such as Field Operations, FSA surveillance, horizon scanning or signal monitoring. Additionally, an incident may be identified through intelligence received or generated by the National Food Crime Unit (NFCU). Relevant information indicating a food or feed incident

is communicated to the Incidents Team; this may be immediately after the receipt of information, or at a later point in the development of a strand of intelligence, particularly if a current safety concern relating to food (or feed) on the market becomes apparent. Any incident with potential indications of food crime is promptly referred to the National Food Crime Unit (NFCU).

2.5 External notifications such as those from Industry and food business operators (FBOs) are reported directly to the incidents teams across England, Wales and Northern Ireland. Incidents can be reported to the FSA incidents teams in England, Wales and Northern Ireland regarding food and/or feed-related and environmental contamination incidents on a 24/7 basis. Members of the public can report food safety concerns to the FSA General enquiries helpline (0330 332 7149) or [submit an enquiry](#) via email.

2.6 Information on incident reporting is available on the FSA's website [report an incident](#) page. Food Standards Scotland (FSS) has its own reporting process in place as detailed within the [Food Standards Scotland Incident Management Framework](#).

2.7 Local Authorities have a responsibility under the [Food Law Code of Practice and Feed Law Code of Practice](#) (with separate codes for England, Scotland, Wales and Northern Ireland) to inform the FSA/FSS of national (non-localised) or serious localised incidents. Find the relevant [Scotland Codes of Practice](#) on the FSS website.

2.8 Some incidents, such as serious foodborne, feed borne or animal health related outbreaks may also be notified by the public health or animal health authorities in each nation. The FSA is also informed of incidents via Other Government Departments (OGDs), including FSS, and the emergency services if they consider an incident or cross cutting issues may potentially impact on food and/or feed safety.

2.9 The International Food Safety Authorities Network (INFOSAN) and Import of Products, Animals, Food and Feed System (IPAFFS) are also important sources. Since the EU Transition on 1 January 2021, the UK has third country access to the EU Commission Rapid Alert System for Food and Feed (RASFF) network. This allows the UK to only receive food and feed safety related information where the UK is affected.

Classification of incidents

2.10 The FSA is responsible for responding to all food and feed incidents that it is notified of and in the initial stages all incidents will be regarded as a suspected risk to public or animal health until there is evidence to the contrary.

2.11 On receipt of an incident notification, classification of the incident is carried out by means of an Incident Classification Assessment (ICA), Figure 1 below.

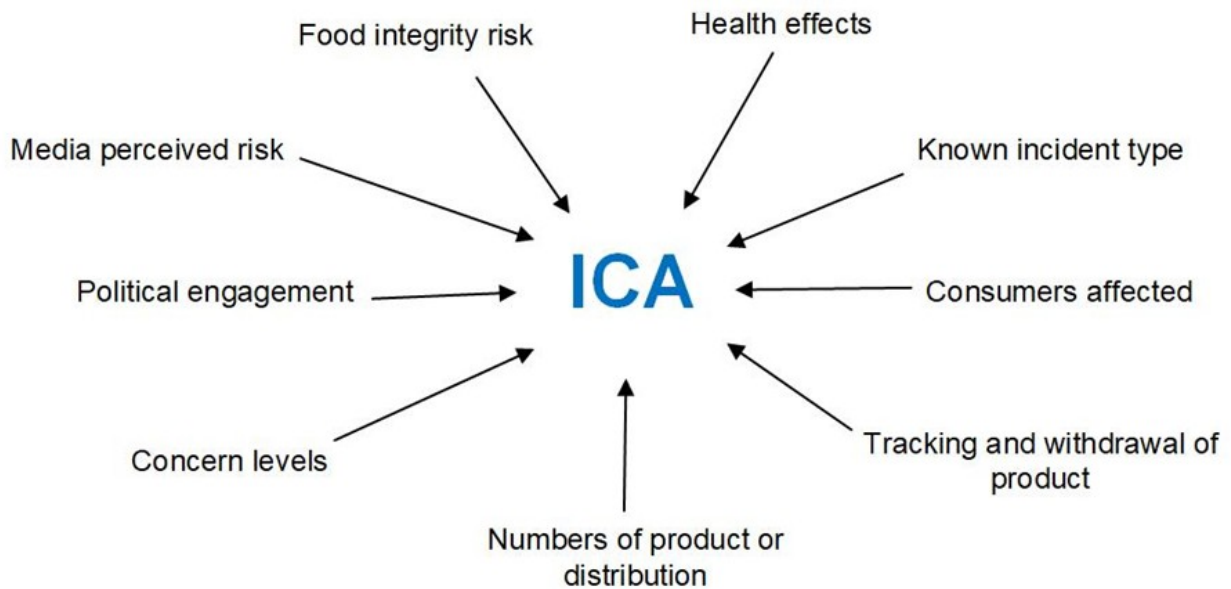


Figure 1: Incident Classification Assessment

2.12 If during a routine incident it is considered that successful management requires levels of resources and authority beyond those available for normal incident handling, then a decision will be made based on set criteria whether to escalate to non-routine incident classification levels.

2.13 An incident response may also be activated for issues relating to food chain integrity, food authenticity, food crime, business continuity or as part of a multi-agency response to an emergency or crisis.

2.14 Further information on incident classification and assessment can be found in [annex A](#).

Escalation criteria

Incident assessment

2.15 In responding to an Incident, there is an assessment of the risk associated with the incident, the purpose of which is to determine the potential scale, scope, nature and impact of the incident. There are several components of incident assessment, the main part is the Incident Classification Assessment (ICA).

2.16 Risk management advice and food or feed safety risk assessment can contribute to the classification of an incident; they are, however, rarely conducted for the purposes of incident classification, and would more likely be performed during the incident response. Further information on how the ICA prioritises and classifies an incident can be found in [annex A](#).

Risk management

2.17 The process, distinct from risk assessment, is the weighing of policy alternatives to accept, minimize or reduce assessed risks and to select and implement appropriate options. Risk Management is carried out in consultation with all interested parties, considering risk assessment, and other factors that are relevant for the health protection of consumers or animals and for the promotion of fair-trade practices, and, if needed, selecting appropriate prevention measures.

Scientific risk assessment

2.18 A scientific risk assessment will be undertaken to determine human and/or animal health risks associated with an incident and informs the ICA. The risk assessment is co-ordinated by the FSA's Incidents Team in England and Consumer Protection teams in Wales and Northern Ireland and in liaison with APHA, Defra and FSS Scientific Risk Assessment Teams where appropriate. They liaise with the relevant policy teams, who will commission a risk assessment from the Risk Assessment Unit (RAU), if required internally. The involvement of OGDs such as Department of Health and Social Care (DHSC) or Department of Environment and Rural Affairs (Defra) may be required. Risk assessment may also be commissioned by other government departments, to inform FSA response, for example, by the National Response Centre (NRC) who are responsible for UK public health security. In general, FSA risk assessment involves the following steps:

Hazard identification

Involves identifying biological, chemical, radiological, physical agent(s) and/or allergens capable of causing adverse health effects. In toxicology, hazard identification involves identifying the type and nature of adverse effects that an agent has an inherent capacity to cause in an organism, system or (sub)-population.

Hazard characterisation

Involves evaluating the nature of the adverse health effects associated with the hazards. In toxicology, hazard characterisation involves describing the inherent properties of an agent or situation having the potential to cause adverse effects.

Exposure assessment

Characterises the amount of a hazard that may be consumed by members of the exposed population(s). It evaluates the likely intake of hazards via food as well as exposures from other sources if relevant.

Risk characterisation

This step draws together the information from the stages of hazard identification, hazard characterisation and exposure assessment to give an overall assessment of the nature of the hazard and the extent to which people are likely to be exposed. It estimates the likelihood and severity of known or potential adverse health effects in a given population to produce an overall risk estimate. The overall uncertainty associated with the risk estimate is described during this stage.

Criteria for escalation

2.19 Whilst many incidents and outbreaks are dealt with using routine arrangements, there are incidents that, due to their complexity, scope, scale and impact require strategic leadership and additional resource. These incidents are escalated to non-routine status and defined as non-routine serious, severe or major; in line with escalation criteria set out in the supporting Incident Management Co-ordination Group Standard Operating Procedures. Escalation of incidents within FSA meet a combination of impact threshold triggers and is confirmed in a written problem statement, to be agreed by the Strategic Incident Director and/or the Chief Executive. An example of escalation criteria within FSA is demonstrated in Figure 2 below. Further detail on Incident classification can be found at [annex A](#).

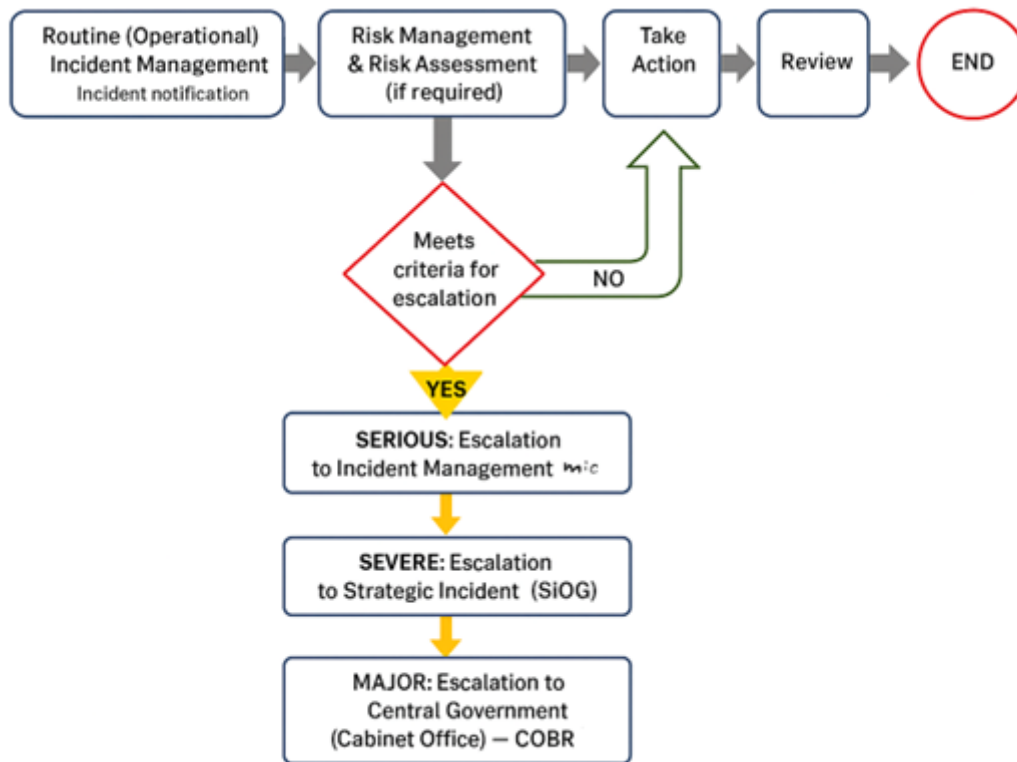


Figure 2: Incident escalation process

2.20 There are also levels of emergency response, set out in the Amber Book (previously known as UK Central Government Concept of Operations (CONOPs)) that may necessitate FSA involvement in a co-ordinated central government response. This could include leading a central response as the lead government department (LGD) for food or, where FSA may be required to provide input to ensure the remediation of that incident/emergency and the longer-term recovery. For example, through providing guidance, co-ordination, people, expertise or specialised advice depending on the nature of the emergency and its impact.

2.21 Making sure an incident, emergency or business continuity event is managed at the appropriate level is key to a successful response. Depending on the issue it is the responsibility of the following individual to consider escalation:

- Food and feed safety incidents - Incident Manager or Head of Incidents / Consumer Protection Division (CPD)
- Business Continuity – Head of Resilience
- Emergency – Any member of the senior or Executive Management Team

2.22 Escalation to non-routine status may be considered even when the FSA is not the LGD. A strategic and/or tactical response from FSA may be required for the co-ordination and remediation of that incident, despite being led by another Government Department. An example of this may be an animal health related incident (for example, infectious and/or notifiable disease) or a pandemic. Figure 2 above sets out the incident escalation process.

2.23 Rapid escalation: In the case of an obvious severe incident the escalation steps may be taken rapidly. The CEO and other relevant Directors may be responsible for escalation.

2.24 Major incidents: Escalation to a Major incident will occur if the severity of the incident is such that it may threaten serious damage to human and/or animal health, or serious damage to the

environment or have long term impacts on the food/food supply chain. In such cases it may be classed as an ‘Emergency’ in the terms of the Civil Contingencies Act (2004). Those with FSA strategic oversight responsibility will communicate with Cabinet Office and the COBR Unit who will then decide whether a central co-ordinated government response is required, and Cabinet Office Briefing Room (COBR) should be activated or devolved equivalents. This level of emergency is defined in The Amber Book as Serious Level 2.

2.25 Escalation to International stakeholders: In the event of a major food or feed related incident occurring at international level, the FSA’s UK and International Affairs Directorate are responsible for the coordination of communication and engagement at cross-government, EU and international level.

2.26 Refer to [annex A](#) for further information on how the scale of impact affects the level of the FSA’s response. The table below sets out an example of escalation triggers that would need to be met for escalation purposes. These are required to be a combination of impacts rather than a singular trigger.

Escalation triggers / Classification	Serious	Severe	Major
Media	Increasing regional interest requiring co-ordinated briefings, statements, media monitoring and engagement with OGDs.	Continuous national interest necessitating comprehensive media monitoring, regular briefings and statements, as well as coordinated engagement with other government departments.	Sustained national and/or international interest requiring government level statements.
Public health	Widespread (UK) or multi-country cases of serious or prolonged illness, some requiring hospitalisation, or isolated deaths in vulnerable groups.	UK wide or multi-country serious and prolonged illness, high number of deaths or isolated deaths in vulnerable groups.	Widespread national and/or international deaths.
Industry Products / impact	Number of batches affected / widespread complex food supply chain involving numerous manufacturers / issues with compliance from several sources requiring closure of plant(s).	Numerous to widespread batches affected, requiring several plant closures for detailed investigation or multi-country impact, food supply issues.	Widespread national and/or international closures threatening import/export markets and loss of confidence in integrity of food supply chain in the UK.
Consumer concern	Heightened loss of consumer confidence in one or some aspects of the food chain requiring specific internal investigations.	Significant national loss of confidence in aspects of the integrity of the food supply chain in the UK requiring co-ordinated cross government briefings/statements and/or FSA wide investigation / reputational risk to role of FSA as a regulator.	Widespread loss of public / industry / international confidence in the integrity of the food supply chain in the UK.

Incident Management Plan: Management of a non-routine incident, de-escalation and closure

The Food Standards Agency operates the same incident response structure, applying the procedures coherently, across England, Wales and Northern Ireland.

Command and Control set up for non-routine incident

3.1 [The Amber Book](#) and [ISO Standards: 22361:2022 Security and Resilience](#) are the legal and doctrinal framework that Central Government operate from for emergency response arrangements and are the default starting position for emergencies irrespective of cause. These set out guidelines that help plan, establish, maintain, review, and continually improve a strategic crisis management capability. All departments across HM Government (HMG) have a

responsibility to plan, train and exercise for handling incidents and emergencies, maintaining a state of readiness and building resilience.

3.2 In the Food Standards Agency (FSA), once an Incident has been declared as non-routine the basic principles apply in setting up the command-and-control structure. These arrangements can be scaled up to manage large incidents as well as those incidents that fall outside our remit but may require both a tactical and strategic response from the FSA in their approach.

3.3 The FSA operates the same incident response structure, applying the procedures coherently, across England, Wales and Northern Ireland. Depending on the extent of the geographical area(s) affected, the relevant FSA incident response team located in each of FSA's offices usually leads the response to serious incidents within their country. Food Standards Scotland (FSS), follow their own procedures, and will lead on incidents within their country and work closely with the FSA. In line with the FSA/FSS memorandum of understanding (MOU), there may be occasions where FSS lead a UK wide incident using the FSS Incident Management Plan. However, in some circumstances, depending on the nature and scope of the incident, the FSS and FSA will mutually agree that the FSA should lead the non-routine incident using the FSA's Plan.

The daily rhythm

3.4 The daily rhythm is the routine of events (briefings, teleconferences, meetings etc.) at set times that are designed to flow from one to another, providing a sense of continuity and familiarity to the handling of an incident. It does not need to be taken literally, in that meetings must occur daily but sets out the sequence of events preceding meetings and the processes that follow meetings at the tactical and strategic levels. Although the daily rhythm is usually set early in an incident, it can change as the incident develops and should consider meetings held by FSS as part of the control and command structure.

3.5 It should be noted that when Cabinet Office briefing room (COBR) or its equivalents in Wales and Northern Ireland are convened, the daily rhythm should take account of the requirement to submit information for the Common Recognised Information Picture (CRIP), two hours before COBR or its equivalent meet. The procedures to be followed when COBR or its equivalents are invoked are contained in the Amber Book.

3.6 The Agency has internal standard operating procedures (SOPs) that set out the roles and responsibilities that may be required during a non-routine incident and the purpose of each of those roles.

3.7 The following sections provide an overview of some of the key roles within the response to a non-routine incident.

Incident Manager

3.8 Depending on the nature or scope of an incident, one of the following may be appointed as the Incident Manager: the Head of Incidents, from the Incidents and Resilience Unit (IRU), the Head of Incident Management in Wales, the Head of Consumer Protection in Northern Ireland; the head of a division for the relevant operational area; or the head of a policy team with responsibility for the issue.

3.9 The Incident Manager takes responsibility for the ICA and the risk management of the incident, making sure the FSA is effective in taking corrective action. The Incident Manager will need to be able to understand the technical issues and the nature of the risk management strategies needed and co-ordinate situational awareness to inform the Incident Management and

Co-ordination Group (IMCG).

Incident Management and Co-ordination Group (IMCG)

3.10 The objective of an IMCG is to manage, co-ordinate and deliver a proportionate response at a tactical level for non-routine incidents classified as serious. The IMCG will co-ordinate and manage the incident at the tactical level and determine or agree the need for a risk assessment. For incidents classified as severe and major, the IMCG will, in addition, support and deliver the strategic direction and decision making provided by the Strategic Incident Oversight Group (SIOG).

3.11 Membership of the IMCG will be decided on the classification level and location of the incident. Other government departments may have input into the incident if there are cross cutting issues and may be invited to be members of the IMCG. The higher the level of classification, the greater the expectation for more senior staff or Other Government Department (OGD) representation to attend.

3.12 For serious incidents and above, the IMCG will consider the meeting frequency or '[daily rhythm](#)', be responsible for producing a Situational Awareness Report (SitRep), make decisions on the implementation of the Emergency Call Handling Centre (also known as the incidents hotline) if required, and the set-up of any stakeholder liaison meetings. In addition, it will also consider creating operational leads, staff resourcing, financing; and establishing taskforces to manage work streams.

3.13 Decisions and issues that require strategic input and direction will be escalated by the IMCG Chair to SIOG.

3.14 The IMCG will be maintained for the duration of non-routine incidents and de-escalate as quickly as possible once the incident response has met the criteria requirements for routine handling.

3.15 The purpose, membership and example agenda for the IMCG are set out in the internal IMCG SOP.

Incident Management Co-ordination Group (IMCG) Chair

3.16 Depending on the nature of the incident or emergency response the IMCG should be chaired by a senior individual responsible for the subject matter concerned. Where an individual cannot be immediately identified one of the following will act as the default chair: the Head of Incidents and Resilience Unit, the Head of Delivery in Wales, or Head of Food Safety Policy and Delivery in Northern Ireland.

3.17 The IMCG chair is appointed by and accountable to the Strategic Incident Director (SID). If there is no SID in place the IMCG Chair is appointed by the Director of Operations. The IMCG Chair responsibilities include oversight of and managing the tactical response, updating the SID, owning the SitRep and attending and updating SIOG when set up. If there is no SIOG set-up, the IMCG Chair will provide updates at an agreed frequency to the SID, Chief Executive (CE) and FSA Board.

3.18 The IMCG chair must make sure that plans for communications with external stakeholders, for example, OGDs, Local Authorities (LAs), Primary Authorities (PAs), and where appropriate, industry and consumer groups, are in place to ensure engagement, where suitable. For more information on FSA Communications and Engagement see [section 5](#).

Strategic Incident Oversight Group (SIOG)

3.19 The overarching objective of the SIOG is to provide strategic leadership and decision-making. This includes setting the strategic direction for the IMCG to enable a proportionate response to an incident classified as severe or major to be delivered. Once the strategy is set, the SIOG will direct, support, and provide oversight for the implementation of operational delivery by the IMCG.

3.20 The SIOG are responsible for making strategic decisions based on the risk management advice to enable the IMCG to deliver the response. If the actions, as a result of the incident response, would exceed the Board's agreed risk appetite the CE or Strategic Incident Director (SID) will consult the FSA Chair as soon as possible.

3.21 The purpose, membership, example agenda and template meeting note for the group are set out in the SIOG SOP. Senior members of FSS will be invited to attend.

Strategic Incident Director (SID)

3.22 The SID is responsible for the strategic oversight of the incident. The SID is appointed by the CE and will usually be the director most relevant to the incident. Depending on the nature of or severity of the incident, the CE may decide to assume the role of SID themselves. The SID is responsible for activating the strategic management structure, including convening the SIOG that they will then usually chair. They will also be responsible for providing updates to the CE (if the CE is not attending SIOG), FSA Chair and Board.

3.23 The SID is also responsible for convening any briefing or stock-take meetings with their counterparts in OGDs, co-ordinating these with the incident [daily rhythm](#) as required and establishing strategic level cross-government lines of communication. The SID will also lead on the liaison with the COBR Unit or its devolved equivalent.

3.24 The FSA's internal roles and responsibilities SOP sets out the role and responsibilities of the SID and SIOG Chair during a non-routine incident.

FSA Chief Executive (CE)

3.25 The CE has overall responsibility for decision making and resolution of incidents.

3.26 In a major incident or emergency the CE will chair the SIOG assuming the role of the SID. In less complex incidents or when the situation has stabilised, the CE can decide to delegate this role including the 'power of decision' to the director most relevant to the incident who then becomes the SID.

3.27 The CE and SIOG Chair (if the CE is not the SIOG Chair) are responsible for keeping the FSA Chair informed of non-routine incident developments; the frequency will be determined by the incident [daily rhythm](#). These discussions are also opportunities for consulting the Chair ahead of possible major decisions, recognising that the formal decision-maker is the CE.

3.28 When the FSA are the LGD it is normally expected that the most relevant party, or party requested by the COBR Unit, with expertise on the situation would attend. In the event of a COBR (O) or COBR (M), the most relevant party with expertise of the situation would attend. The CE and/or SID (if role has been delegated) will be responsible for providing any briefing or preparation for the attending Minister. Briefing or verbal preparation for the attending party would be prepared by IMCG.

3.29 The FSA's internal roles and responsibilities SOP sets out the role and responsibilities of the CE during a non-routine incident.

FSA Chief Scientific Advisor

3.30 The Chief Scientific Advisor (CSA) as being closest to the scientific evidence surrounding the incident, is responsible for the rigour and reliability of the risk assessment produced by the FSA and is responsible for providing challenge and comment, as necessary. The CSA is responsible for assuring that any published statement regarding the risk assessment is understood by a lay audience. The FSA's internal roles and responsibilities SOP sets out the role and responsibilities of the CSA during a non-routine incident.

FSA Chair and FSA Board

3.31 The FSA Chair and Board will be kept updated at an agreed frequency on non-routine incidents by the CE (or SIOG Chair) through existing channels. The CE (or SIOG Chair) will update the FSA Chair, in advance, wherever possible on issues that carry significant risk.

3.32 As is normal between meetings of the Board, the FSA Chair has the delegated authority to act on behalf of the Board in order to deal with the business of the FSA. The FSA Chair will update the Board at the earliest opportunity, as part of responding to any incident. Where, in the opinion of the Chair, significant operational matters go beyond the Board's risk appetite, the Chair shall report to the Board at the earliest opportunity on any action that he/she may take. The Board may decide to hold an extraordinary meeting to assess risk if it is intended to go beyond the Board's risk appetite. The CE or SID, informed by the SIOG, will consider the possible impacts of such a decision and, where possible consult the Chair for their view on potential consequences.

3.33 The FSA's internal SOPs provides further information on the role of the FSA Chair and Board during a non-routine incident.

IMCG Meeting Secretariat

3.34 For non-routine incidents, the IMCG Secretariat will issue a calling notice for the IMCG meeting or a SIOG meeting and set the [daily rhythm](#), in collaboration with the IMCG Chair. Representation from the FSA offices in Wales, Northern Ireland and FSS are included, and additional representation from other government departments may be included when required, depending on the nature and cross-cutting remit of the incident.

3.35 Meetings are virtual by default and the standard calling notice will include details of call/dial-in procedures, as well as a meeting agenda. The IMCG's secretariat operating instructions sets out the detail on the role of the Secretariat.

FSA Emergency Response Support Team (FERST)

3.36 The FSA Emergency Response Support Team (FERST) provides a flexible surge capability to strengthen the Agency's response during non routine incidents or emergencies. FERST comprises trained volunteers drawn from across the organisation, enabling rapid mobilisation of skilled personnel when additional capacity is required. This resource supports the IMCG and SIOG by undertaking tasks such as administrative support, data handling, stakeholder liaison, and other functions essential to scaling up the incident response effectively.

Operational cascade briefings

3.37 Any operational leads will be confirmed by the IMCG. They are responsible for specific areas of the FSA's emergency response and will be expected to attend IMCG meetings and other related meetings. Operational leads are responsible for briefing their team members on the outcomes of these meetings.

3.38 It is important for operational leads to hold cascade briefings on a regular basis with their team members (this may be on a daily or more frequent basis). The briefings will cover relevant outputs from the IMCG, SIOG or bird table meetings. Tasks for the team will be assigned, timescales agreed, quality standards set and clearance routes for work sign off will be established.

3.39 Further information on Cascade Briefings is contained in the Operational cascade briefing standard operating procedure.

Resilience during protracted incidents

3.40 During an incident with a prolonged response phase, it is the responsibility of the IMCG, the Incident Manager, and when necessary, the SID to establish robust resourcing arrangements to ensure that staff involved in the response can be rotated and rest periods taken. Rotation of staff should be co-ordinated, with handover procedures put in place.

3.41 A flexible approach is employed between FSA Incidents Teams in the three countries (and in liaison with the FSS) to address resource shortfalls and ensure the well-being of staff. Further to this, the FSA will muster suitable resource from across its structure to support and undertake specific roles and functions as the response dictates. Where necessary decisions may be taken to secure additional external resource from outside the FSA.

De-escalation and closure

3.42 As an incident draws towards resolution, it is appropriate to de-escalate to a lower level, to handle the response as routine business or close the incident. De-escalation will be based upon agreed criteria set out by SIOG and/or IMCG and the agreed criteria being met to inform the decision to de-escalate. The decision will be taken by IMCG collectively, and the recommendation to de-escalate will be notified to the SID or SIOG if stood up, for agreement. The incident de-escalation process from non-routine to routine or closure includes considering whether the incident has met the agreed criteria for de-escalation from non-routine in consultation with the relevant subject matter expert (SME). Where:

- the de-escalation criteria have been assessed but have not been met the incident will continue as non-routine and follows the usual process
- the de-escalation criteria are met and SIOG (if stood up) or SID agree with IMCG recommendation to de-escalate, the incident will then return to routine or if appropriate closed

3.43 All response level changes will be communicated formally to those involved in the response, internally and externally. Options to be considered during incident closure should include handing over to FSA teams that can carry out surveillance or monitor corrective measures.

3.44 Any decision to de-escalate or close an incident may need to consider any specific requirements for recovery. The IMCG should consider the necessary strategy, resources and authority for successful recovery. The examples of incidents, where recovery is a consideration, are radiological incidents and/or other environmental contamination affecting food. Recovery for major incidents should follow the procedures set out in the Amber Book using command and control arrangements in place for a major incident.

3.45 Once closed, all non-routine incidents are subject to incident review – see [section 6](#) incident review and planning.

Information management

3.46 All information relating to an incident is accurately documented and captured on the FSA records management system to ensure that decisions can be justified, and activities can be evidenced.

3.47 All key business information/official record sets are information assets and must be listed on the information asset register.

Incident Management Plan: Major incidents - UK government response

The Cabinet Office, in consultation with No.10 and the LGD, will decide whether an emergency response should be co-ordinated by central government.

4.1 If an incident is serious enough to threaten a wide and/or prolonged impact requiring central government co-ordination and support from several departments and agencies, the central government response will be co-ordinated from the Cabinet Office under the leadership of a LGD. Central government will manage this response in accordance with the Amber Book, which sets out arrangements for responding to and recovering from emergencies requiring co-ordinated central government action. FSA incident response arrangements will operate within the central government emergency response structure. Cabinet Office, in consultation with No.10 and the LGD, will decide whether an emergency response should be co-ordinated by central government.

4.2. The SIOG with input from the IMCG will decide if/when during an incident that the COBR Unit should be notified and inform the COBR Unit. This will normally be undertaken by the SID.

4.3 Depending on the severity of an event, discussions will take place between the LGD, the Cabinet Office and No.10 regarding which of the central government emergency response arrangements are required, which may result in an activation of COBR (for further information see Annex B).

4.4 Activation of COBR facilitates decision making and allows the rapid execution of the co-ordinated central government response. Where COBR (Ministerial) is activated for a food and/or feed-related incident and the FSA is considered the LGD, the Parliamentary Under-Secretary of State for Public Health will normally represent the FSA at Ministerial level COBR meetings.

4.5 The FSA Chair, CEO or designated deputy will brief the Minister in advance of the meeting. The FSA may receive an invitation to attend COBR Ministerial meetings and the FSA Chair and FSA Chief Executive Officer will decide who will attend. This will normally be the most relevant party with expertise to the situation.

4.6 Similar FSA representation to those carrying out Ministerial COBR briefing could be expected at COBR (Officials) meetings. Invitations for the FSA to attend COBR (Ministerial or Officials) will be circulated by the COBR Unit.

4.7 Where FSA is considered the LGD for an incident affecting Wales or Northern Ireland solely, then the FSA Director with responsibility for Wales/Northern Ireland may be required to attend the relevant COBR equivalent as the designated Deputy. There may be also occasions where

another department is lead but the FSA presence at COBR is required to support the cross-government response.

4.8 Further detail on central government emergency response arrangements is set out in Annex B – UK Government Response and how they apply. Annex B provides information on COBR, the Scottish Government Resilience Room (SGoRR); the Emergency Co-ordination Centre Wales (ECCW), the Civil Contingencies Group Northern Ireland (CCGNI), the [Scientific Advisory Group for Emergencies \(SAGE\)](#), the Common Recognised Information Picture (CRIP); the LGD; the [Scientific and Technical Advisory Cells \(STACs\)](#) and the News Co- ordination Centre (NCC).

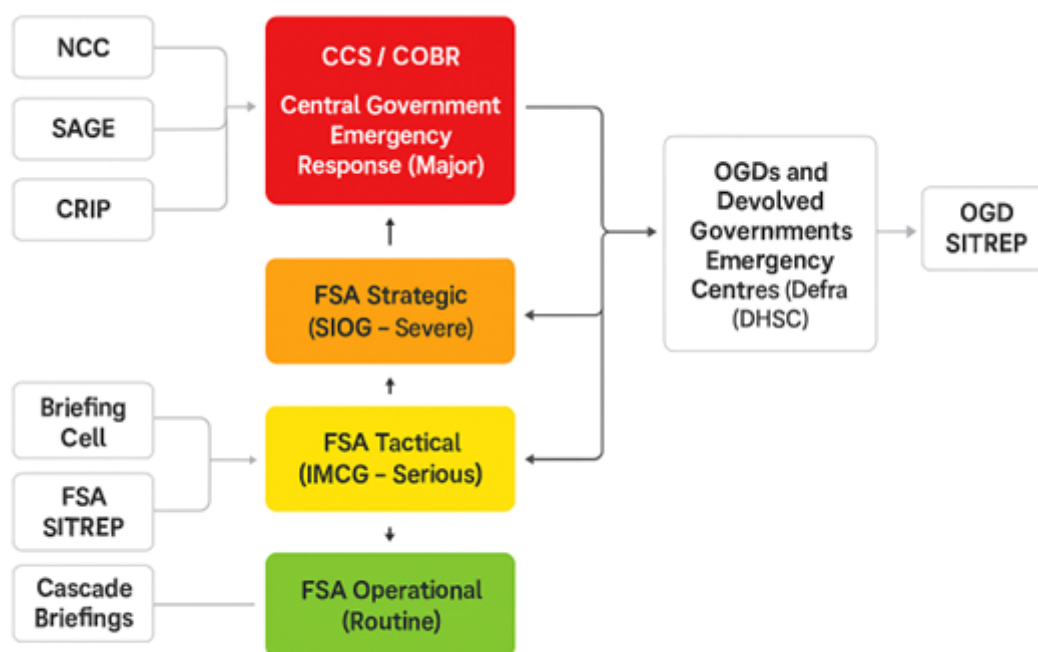


Figure 3: FSA command and control interface with national emergency structures

4.9 How the FSA command and control structure links to central government response is shown in the above diagram (Figure 3). This sets out the emergency response mechanisms across central government in relation to the FSA's incident response at strategic, tactical, and operational levels. See Annex B for devolved arrangements.

Incident Management Plan: communications and engagement

The FSA is committed to being as open as possible about what we do and why we are doing it.

Communications

5.1 Communication during an incident is key, not just to the public but to other stakeholders too, whether they are industry, consumer groups, the media, local authorities (LAs), government

ministers or other national or international agencies.

The Food Standards Agency (FSA) is committed to being as open as possible about what we do and why we are doing it.

The FSA will:

- give people and stakeholders suitable information where they need to act and to keep them informed
- be open about emerging incidents and what the FSA is doing to investigate them, even if we do not have the full details, including the source
- provide timely response as appropriate to media enquiries
- protect enforcement action or legal proceedings by not publishing information that may prejudice investigations, unless the need to protect consumers would require immediate release of information

Communications management

5.2 When a high-profile incident is particularly widespread or poses an immediate risk to people's health, the FSA will issue communications, including news stories, sharing information on social media, and responding to requests for information from the media and the public. The FSA will act as the main source of information on food and feed related issues during incidents and will work collaboratively with others to cascade information to the public, industry, and businesses as well as Other Government Departments (OGDs), Non-Government Organisations (NGOs) and LAs.

5.3 Where OGDs are leading the investigation, the FSA will work closely with them. The FSA applies the same approach to risk assessment and risk management across England, Wales and Northern Ireland, and will manage its communications in the same proportionate and considered manner. The FSA also works closely with Food Standards Scotland (FSS) to ensure that messages are consistent.

Communications approaches

5.4 In any high-profile incident that relates to food or feed, there are a number of groups who need to be kept informed. They include:

Consumers

5.5 When an incident is considered serious with an immediate risk to the public, the FSA will seek to rapidly reach people using a mix of channels, appropriate to the audience, to give context and further explanation of risks.

5.6 The FSA will also consider whether to give the public information about an ongoing incident even if the cause is not known if it is appropriate to do so. An example of this might be an outbreak of foodborne illness spread over several weeks or months, where there is a spike in cases linked to a common strain of pathogen. Often, the actual source takes time to investigate and even establishing a link to food can be difficult to prove.

5.7 The FSA will be open and factual in its communications about the potential risk, the products affected, and the advice given. The FSA will state what actions the food business operator (FBO) involved has taken or is taking (for example, to remove the product from sale) and give advice on what to do if they have the affected product or have already consumed it.

Industry and local authorities (LAs)

5.8 Many incidents will require close collaboration with industry and LAs on communications. We will work with FBOs on steps they are taking to highlight a recall through social media, displaying point of sale notices or other means.

5.9 On occasion, the FSA may still feel it necessary to publish a news story or undertake social media activity even when the relevant FBOs are taking all the appropriate action in withdrawing or recalling an affected product.

5.10 The FSA will, where appropriate, show news stories to relevant FBOs and LAs in advance of publication to confirm factual accuracy. The FSA will be prepared to consider new information or additional comments, if they are relevant, but will retain full editorial control.

Media handling

5.11 The FSA spokesperson will be the person who will give the public the most confidence in the FSA's response to the incident. This will be agreed by Strategic Incident Oversight Group (SIOG) based on advice from the FSA Communications team. Although each incident is different, the spokesperson is most likely to be either the Chief Executive or Strategic Incident Director (SID) if the request is about our response, and/or we have an 'ask' for the business or the public, and/or the CSA if the request is about the risk assessment or science. If it is about commenting to the public on the role of the FSA and its handling of the incident, this is more likely to be the FSA Chair.

FSA board and staff

5.12 We use our internal communications channels to ensure we keep FSA staff updated during non-routine incidents as agreed in the Incident Management Co-ordination Group (IMCG) / SIOG incident communications strategy.

5.13 The SID as SIOG chair will be responsible for providing updates and agreeing the frequency of updates between the FSA Board, the FSA Chair and SIOG.

Ministerial Communications

5.14 The SID through the SIOG will lead on updates to Ministers working across the Devolved Administrations as appropriate. Frequency is determined by SIOG as part of the incident Daily Rhythm. Further information on FSA's communications with Ministers is included in the FSA's internal standard operating procedures (SOPs).

FSA in support

5.15 In multi-agency incidents or emergencies where the FSA is not the lead department, the agency adopts a supporting role. In such cases, the FSA will contribute risk assessments, scientific evidence and risk management advice through Strategic Coordination Groups (SCG) as per the emergency response framework set out in the Civil Contingencies Act 2004.

5.16 When the FSA is in a multi-agency supporting role, the Amber Book principles as laid out in the FSA's non-routine incident management plan will apply.

5.17 Where there are wider political and public policy considerations, Ministers may want to make final decisions on risk management although the FSA reserves the right to publish independent advice if deemed appropriate.

Engagement

Linking to Other Government Departments (OGDs) and Agencies

5.18 To ensure clear understanding of roles and responsibilities across UK government, the FSA has close working relationships with all the relevant government departments and agencies.

5.19 In the event of a non-routine incident, we will work with OGDs or agencies, as appropriate. The nature and scale of the incident will determine which organisations need to be involved and in what capacity.

5.20 Often, OGDs will lead on specific incidents, for example Department for Health and Social Care (DHSC) and the relevant public health authority will lead on the public health impacts of foodborne illness outbreaks. In these instances, the FSA command and control structure may be set up to inform the OGD's response and to cover the FSA's areas of responsibility. The FSA escalation process should reflect its lead government responsibilities or supporting role, when dealing with food contamination during a foodborne outbreak.

5.21 The IMCG, in liaison with the Incident Manager, will consider options for communication including hosting meetings with relevant government officials across the UK, setting up 'bird table' meetings, inviting representatives from OGDs to be a member of IMCG or arranging exchange of information through sharing of incident Sit-Reps. The FSA's Stakeholder Management Plan contains further details.

Linking to Local Authorities (LA)

5.22 Consideration of enforcement action required will be carried out as part of the FSA command and control processes.

5.23 The FSA works with LAs as set out in [The Food and Feed Law Codes of Practice and practice guidance](#). The expectations for action taken by LAs are communicated by various mechanisms. Plans for broad enforcement controls, such as sampling plans and advice to FBOs, may be decided at FSA strategic or tactical levels and funding considered. IMCG will engage with those LAs on decisions made during a serious incident.

5.24 The decision on taking legal action against an FBO will need to be made in accordance with relevant legal requirements, the LA's own enforcement policy and the Food and Feed Law Codes of Practice, at LA level and in close liaison with the FSA. During an FSA major incident, the LAs may enact their local emergency procedures (via their own Local Resilience Forums) setting up their own strategic co-ordination mechanisms, which the FSA may be invited to attend.

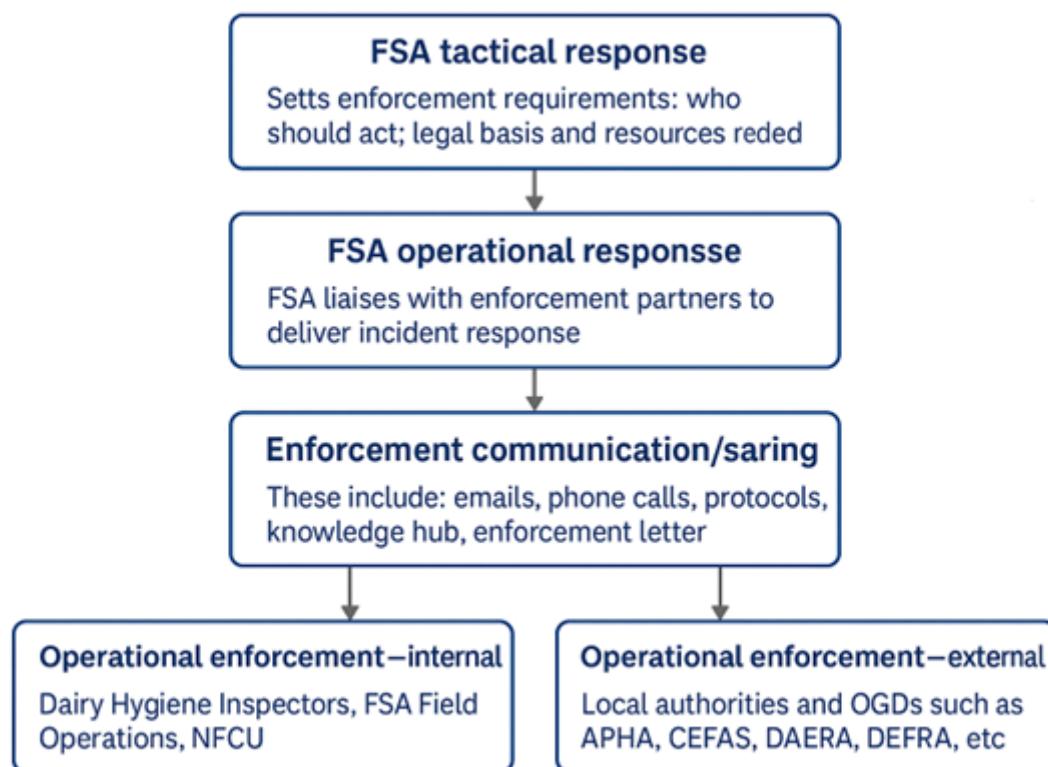
5.25 The FSA is responsible for actions taken by dairy hygiene inspectors, wine inspectors and meat hygiene teams.

5.26 Enforcement action may take place through activity linked to a food crime investigation by the National Food Crime Unit (NFCU), whether undertaken with partners or unilaterally.

5.27 There are instances where enforcement activities may be required in liaison with other government partners, such as Defra's agencies or DAERA. In these cases, the FSA will work closely with partners through the mechanisms outlined above.

5.28 Figure 4 displays the FSA's response at a tactical and operational levels and the tools it uses to communicate and share information with internal and external enforcement partners.

Figure 4: FSA enforcement partners



International links

5.29 Although the UK has left the EU, the FSA continues to liaise with the EU Commission on Crisis management as a matter of best practice and following the UK's international obligations.

5.30 The FSA's Incidents Team in England is the national contact point in the International Food Safety Authorities Network (INFOSAN) – run by World Health Organisation (WHO) and the Food and Agriculture Organisation of the United Nations (FAO) for communication between national food safety authorities regarding urgent events. FSA Northern Ireland continues to use RASFF and TRACES for international incidents.

5.31 INFOSAN, is used to exchange information on serious risks to public health in relation to food and feed which might impact on other countries, this function is based on International Health Regulations 2005.

5.32 The UK shares a land border with the Republic of Ireland (RoI), and the FSA and the Food Safety Authority of Ireland (FSAI) work closely together to ensure the effective management of food incidents occurring in either or both jurisdictions. This arrangement is formalised by a Memorandum of Understanding between the two organisations. The FSA also works with the Department of Agriculture, Food, and the Marine (DAFM) in the RoI, via the established links with FSAI. A multi-agency approach is taken involving the relevant UK and RoI authorities to address non-routine incidents affecting either or both jurisdictions.

5.33 Where appropriate (for example where deception or fraud in another country is suspected as being a contributing factor to the root cause of an incident), the NFCU currently has the capability to share requests for assistance with EU member state food fraud contact points, via a protected section of the AAC IT platform while available or via established bilateral country contacts.

Incident Management Plan: incident review and exercise planning

A review process takes place for those non-routine incidents where lessons have been identified.

Incident review

6.1 A review process, including root cause analysis (RCA) methodology, will take place for those non-routine incidents where lessons have been identified.

6.2 The FSA's Emergency Preparedness Resilience & Response Board (EPRRB) has oversight responsibility for making sure the Food Standards Agency (FSA) identifies lessons from incident review and emergency exercises to ensure FSA capability in this respect is maintained.

6.3 It delegates functions relating to incident reviews to the Incident Review Sub-Group (IRSG). This is to ensure incident handling continually improves and to understand the root cause of incidents to help prevent future incidents of a similar nature. The FSA may undertake joint reviews with partner organisations.

6.4 Various mechanisms for review exist and a single review may include more than one of the mechanisms shown in the table below.

Timescales for incident review type (table 2)

Review type	Timescale
Hot wash up or hot debrief	Within two weeks after the incident is de-escalated, or after the response period if the incident is prolonged.
Organisational debrief (cold debrief)	Within eight months post-incident.
Multi-agency debrief (cold debrief)	Within four to six weeks post-incident.
Third party post-incident report	For protracted or high impact incidents, the FSA may commission a third-party post-incident report. Timescales for these would need to be agreed and would be supported by terms of reference. Output will be in the form of a report with recommendations.

6.5 The IRSG advises on case-by-case basis, on the method of review. In general, cold debrief workshops are mainly used for multi-agency incidents involving external stakeholders, and questionnaires are used for review of incidents managed internally.

6.6 Review reports are submitted to IRSG and may be submitted to the EPRRB.

Root cause analysis (RCA)

6.7 RCA allows food businesses to identify the initiating cause(s), which led to the food incident and, additionally, the stage at which intervention could reasonably be implemented to mitigate risk and prevent future recurrence. Therefore, it provides a better understanding of when, why, and how food safety incidents occur in accordance with the [Food Law Code of Practice \(England\), Chapter 5](#).

6.8 Alongside other bodies of work, the FSA encourages food business operators (FBOs) to conduct RCA after a food incident has occurred (especially when a recall of a product was required) and share the learnings. This helps the FSA to identify emerging incident causal factors, best practice and working with industry and enforcement bodies to mitigate future incidents.

6.9 Where an element of food crime is involved, or suspected to be involved, in the RCA of a food incident, it will be necessary for evidence gathering opportunities to be considered before a food business is requested to perform such an analysis, if it is even appropriate in these circumstances for such an analysis to be requested. This evidence gathering could include the procurement of witness accounts or exhibits in a prompt and evidentially sound manner.

Exercise planning

6.10 The FSA builds and embeds lessons identified from exercising and practicing (repetitive activities that focus on specific skills) as well as from reviews of incidents to continuously improve organisational-wide incident resilience and capability.

6.11 The EPRRB oversees the FSA's emergency exercise programme which includes a training and drilling programme. The programme also includes participation in exercises led by Other Government Departments (OGDs).

6.12 The FSA exercise programme has two basic aims:

- to exercise the FSA Incident Management Plan (IMP) and associated standard operating procedures (SOPs) to ensure its fitness for purpose
- to involve FSA staff in emergency exercises as part of maintaining a capable cadre of staff trained to take on incident and emergency response roles and maintain FSA competency in this area

6.13 Post exercise reports are produced, and any actions added to the Lessons Identified Management Register (LIMR) which is governed by EPRRB.

Incident Management Plan: annex A – routine (operational) incident management

Incidents Team response to routine incidents.

Routine incident response

The Incident Team (England) and Consumer Protection Teams (Wales, Northern Ireland) lead the administrative and investigative response to all food/feed incidents.

The Head of Incidents / Consumer Protection usually acts as Incident Manager and ensures all teams meet their incident handling responsibilities.

The Head of Incidents and Resilience Unit (IRU) (or equivalent position in Wales and Northern Ireland), and the Head of Resilience and Prevention (or an equivalent) who can advise on incident protocols and offer an independent opinion, will decide, based on the written problem statement, whether an incident meets the criteria for escalation. The Incident Management Co-ordination Group (IMCG) will be convened during a non-routine incident to manage and co-ordinate the response at a tactical level.

The Food Standards Agency (FSA) response varies with incident scale. Routine responses may include:

- issuing Food Alerts For Actions, Product Recall Notices, Allergy Alerts, INFOSAN notices; incident logging; and IMCG administrative support
- developing communications strategies and question and answer materials
- conducting sampling, surveillance and monitoring
- involving Field Operations and, when relevant, National Food Crime Unit (NFCU) for food crime or online investigative needs

Incident classification assessment (ICA)

The incident classification assessment (ICA) is an auditable decision-making tool used to classify incidents and record strategic and tactical considerations. It does not quantify scientific risk.

Initial assessment is led by England's Incident Team or devolved Consumer Protection Teams, overseen by the Incident Manager. Key ICA criteria include:

- ability to apply interventions to reduce concern
- concern levels and affected consumer groups
- efficacy of product identification and withdrawal or recall of product
- food integrity
- health impacts
- health security risks
- international engagement
- known incident hazard type
- media perception risk
- number of products or scale of distribution
- political concern

ICA updates may require input from internal policy teams, risk assessors, analysts, Other Government Departments (OGDs) and stakeholders. The Incident Manager oversees the ICA for all incidents.

Food crime may not increase food safety severity but increases investigative complexity. NFCU engagement should occur early to support evidence capture and operational coordination.

Incident classification

An Incident response can be activated for food chain integrity, authenticity, food crime, business continuity, or health security risks related to food or feed, including local or national outbreaks. Outbreaks are managed by the public health authority in each UK nation, while animal health issues are handled by the Animal Health and Plant Health Agency (APHA).

Incident classification reflects the suspected impact and required levels of resource and authority.

Three non routine classifications are recognised: Serious, Severe, and Major, each with increasing magnitude and senior oversight and strategic involvement. Escalation may occur even if the FSA is not the Lead Government Department.

Classification descriptions

Routine incidents are the most common and are managed with standard processes. They may involve outbreaks of illness, statutory breaches, contamination, animal disease implications, or

pollution, and may generate public or media concern.

Serious incidents exceed routine capacity and require short term, tactical decision making for the resolution of the incident and resource allocation to be made by the Incident Management Coordination Group (IMCG). These tend to be the majority of our non-routine incidents and are usually quite complex.

Severe incidents require strategic leadership and decision making and to set the longer term, strategic direction of an incident for the IMCG. Escalation to this level leads to the invocation of the Strategic Incident Oversight Group (SIOG). Incidents of this type usually require significant cross-departmental communications strategy and collaboration. These usually have a significant impact on resources which may require reprioritisation of priorities

Major incidents are those which require a central government led co-ordinated response. The FSA may take on various roles, including acting as the Lead Government Department.

FSA classifications align with central government emergency classifications and responsibilities. The strategic direction and tactical management during an incident is subject to continuous review and adjustment

Responsibilities, accountability and command & control arrangements in England, Wales and Northern Ireland

Routine

- **lead:** Incident Manager; Heads of Incidents/Consumer Protection Division in England, Wales and Northern Ireland
- **escalation:** Head of IRU / devolved equivalents and other internal parties
- **accountability:** Director of Operations (England and national impact incidents) / Northern Ireland & Wales Directors
- **operational tasks:** Issue notices (Food Alert for Action [FAFA], recalls and allergy alerts), INFOSAN, SitReps, developing comms lines, Q&A, IMCG support

Serious

- **lead:** IMCG and Incident Manager
- **escalation:** Strategic Incident Director (SID) / IMCG Chair / IMCG
- **accountability:** Strategic Incident Director (SID), Director of Operations (England and national impact incidents) / Northern Ireland & Wales Directors
- **tasks:** Tactical response, daily rhythm, risk assessment and risk management, stakeholder coordination, SitRep co-ordination, Communications and media strategy approval

Severe

- **lead:** SIOG (strategic), IMCG (tactical)
- **escalation:** Strategic Incident Director (SID) / IMCG. IMCG Chair provides a 1-page briefing note that sets out the facts, impacts and next steps to inform SIOG's discussion
- **accountability:** SID and / or CEO
- **tasks:** Answers the strategic questions to establish FSA's strategy response, liaise with (and includes) OGD equivalents as required

Major

- **lead:** SIOG (Strategic) / SID (CEO may act as SID), IMCG (Tactical), IMCG Chair
- **escalation:** COBR Unit
- **accountability:** FSA CEO and Ministers
- **tasks:** central government coordinated response, COBR participation, CRIP, ministerial briefings. In the event of a COBR(O) or COBR(M), the most relevant party with expertise to the situation would attend

How scale of impact drives escalation

Media

- **serious:** increasing regional interest requiring co-ordinated briefings, statements, media monitoring and engagement with OGDs
- **severe:** continuous national interest necessitating comprehensive media monitoring, regular briefings and statements, as well as coordinated engagement with other government departments
- **major:** sustained national and/or international interest requiring government level statements

Public health

- **serious:** widespread (UK) or multi-country cases of serious or prolonged illness, some requiring short-term hospitalisation, or isolated deaths in vulnerable groups
- **severe:** UK wide or multi-country serious and prolonged illness, high number of deaths or isolated deaths in vulnerable groups
- **major:** widespread national / international deaths

Industry impact

- **serious:** number of batches affected, widespread complex food supply chain involving numerous manufacturers, issues with compliance from several sources requiring closure of plant(s)
- **severe:** numerous to widespread batches affected, requiring several plant closures for detailed investigation or multi country impact, food supply chain issues
- **major:** widespread national / international closures threatening import / export markets and loss of confidence in the integrity of food supply chain in the UK

Consumer concern

- **serious:** heightened loss of consumer confidence one or some aspects of the food chain requiring specific internal investigations
- **severe:** significant national loss of confidence in aspects of the integrity of the food supply chain in the UK requiring co-ordinated cross government briefings/ statements and/or FSA wide investigation / reputational risk to role of FSA as a regulator
- **major:** widespread loss of public / industry / international confidence in the integrity of the food supply chain in the UK

Incident Management Plan: annex B - UK Government response

This section describes the UK government response to incidents and provides a description of the main structures and arrangements.

COBR activation and FSA representation

Cabinet Office Briefing Rooms (COBR) may be activated to coordinate the central government response. Where food safety issues arise, the Parliamentary Under Secretary of State for Public Health normally represents the Food Standards Agency (FSA) at ministerial COBR meetings. The FSA Chief Executive (or deputy) briefs the minister; the FSA Chair may attend if their presence is beneficial.

At Officials level COBR, the FSA is invited by the COBR Unit and is normally represented by the Strategic Incident Director (SID). However, the COBR Chair has delegation to name a representative they chose.

COBR operations vary by incident type. The FSA is listed by the Cabinet Office as [the department responsible for planning, response and recovery for food contamination emergencies across all UK nations](#). In England this responsibility is shared with the Department of Health and Social Care (DHSC).

Where the FSA is the Lead Government Department (LGD), it performs a number of roles which the Cabinet Office guidance on the Role of Lead Government Department in Planning and Managing Crisis outlines. The FSA is expected to be present at COBR and equivalent structures across the UK, though as a non ministerial department it is unlikely to chair COBR.

Lead Government Department (LGD) responsibilities

The Home Office is LGD for terrorist related emergencies in England, Scotland and Wales, with support from Other Government Departments (OGDs). Food related terrorist incidents will require FSA expertise. In devolved nations, the relevant Secretary of State represents Scotland, Wales, or Northern Ireland in COBR.

The Cabinet Office guidance '[role of the Lead Government Department in planning and managing crisis](#)' sets out LGD responsibilities. Officials representing FSA at COBR are encouraged to undertake Cabinet Office emergency response training.

A key Cabinet Office task is producing the Central Government Response Information Picture (CRIP). The FSA may produce a Situational Report (SitRep) for an incident, this will follow the SitRep standard operating procedure (SOP) template, which inform the Common Recognised Information Picture (CRIP).

Cross government coordination mechanisms

Depending on the incident, FSA engagement in COBR related structures is determined by Strategic Incident Oversight Group (SIOG) or Incident Management and Co-ordination Group (IMCG). Key groups include:

[Scientific Advisory Group for Emergencies \(SAGE\)](#)

Can be activated by COBR, the LGD, and Chaired by the Government Chief Scientist and/or Chief Medical Officer. Scientific Advisory Group for Emergencies (SAGE) coordinates scientific and technical advice and provides peer review.

If food is implicated, the FSA is represented by the FSA Chief Scientific Advisor or deputy. SAGE guidance on food and/or feed emergencies is held by GO Science.

Scientific and Technical Advisory Cells (STACs)

Provide scientific advice to local responders. The FSA attends Scientific and Technical Advisory Cells (STACs) where food and/or feed safety is relevant, normally represented by a senior expert from the lead division. The Department for Levelling-up, Housing and Communities (DLUHC) RED provides the FSA with STAC dial in details.

News Coordination Centre (NCC)

Activated during Level 1 (or above) emergencies. Advises the LGD on media handling, maintains briefing lines, and supports COBR. Activation is decided by the Cabinet Office in consultation with the LGD and the Prime Minister's Office.

Further cross government functions are described in Central Government Amber Book.

Liaison between COBR and the devolved administrations

COBR engagement with devolved nations is set out in the Amber Book. Devolved Ministers are invited to attend COBR where their territory is affected; officials attend Officials level COBR.

For most non terrorist emergencies, devolved governments lead consequence management in their territories. Guidance on preparedness is available on the [Cabinet Office Emergency Preparedness website](#).

Scotland

For large scale or complex incidents that require some degree of central government co-ordination or support, the Scottish Government activates Scottish Government Resilience Room (SGoRR). In the event of a major food incident senior Food Standards Scotland (FSS) representatives are expected to attend.

Further guidance:

- [FSS Incident Management Framework](#)
- [Scottish Government Ready Scotland website](#)

Wales

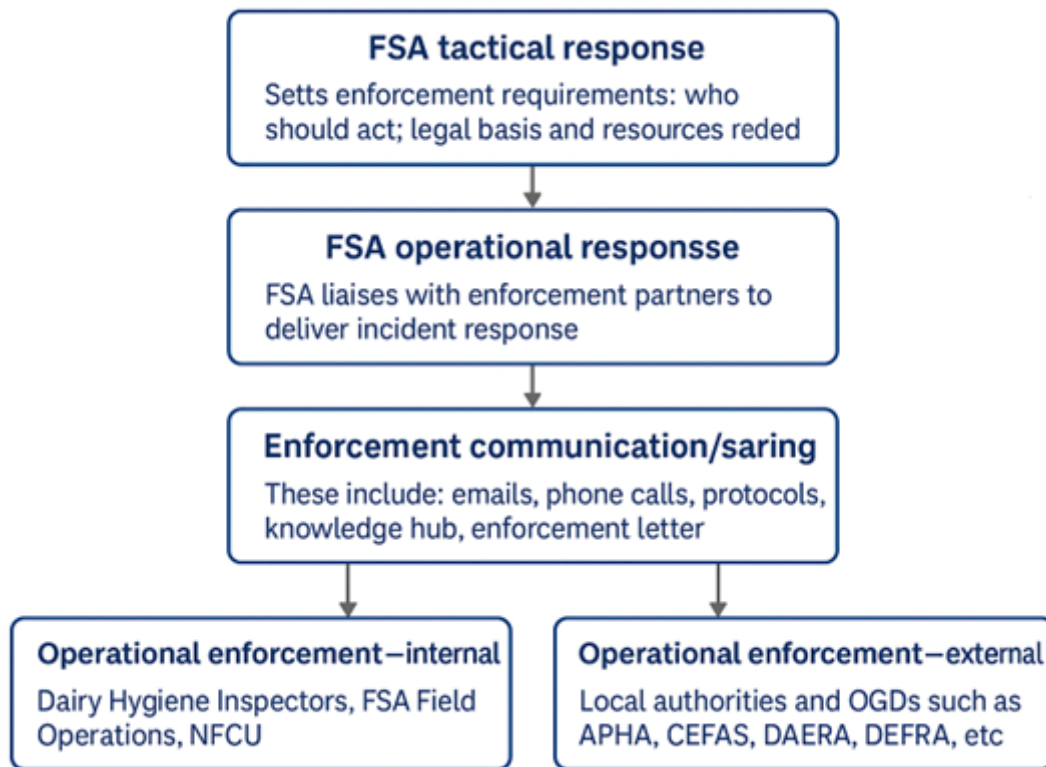
The Emergency Co ordination Centre Wales (ECCW) engages with COBR. FSA Wales contributes depending on the nature of the emergency.

The Welsh Resilience Forum (WRF) promotes good communication and the enhancement of emergency planning across the agencies and services in Wales. The WRF provides forum for Chief Officers to discuss with Welsh Ministers strategic issues of emergency preparedness.

Northern Ireland

Civil contingency policy is led by The Executive Office (TEO) which provides the NI Executive with immediate oversight of cross-cutting civil contingency arrangements for devolved matters. The Northern Ireland Office (NIO) has responsibility for national security matters and will lead the strategic response to such emergencies.

Northern Ireland Central Crisis Management Arrangements (NICCMA) for response to an emergency situation are detailed in the following figure:



- the FSA participates across NICCMA, including the Civil Contingencies Group, NI Hub, C3 Leads, and Departmental Operations Centres. NICCMA structures link into UK Government contingency systems and COBR

Find [further information on NICCMA](#).

Incident Management Plan: Glossary

Glossary for the Incident Management Plan for Non-Routine Incidents.

AAC: Administrative Assistance and Co-operation platform

The Amber Book: Previously known as CONOPs – UK Central Government Concept of Operations

APHA: Animal Health and Plant Health Agency

BAU: Business as Usual

BEIS: Business Energy and Industrial Strategy

CCGNI: Civil Contingencies Group Northern Ireland

CEO: Chief Executive Officer

CEFAS: Centre for Environment, Fisheries and Aquaculture Science

CMG: Crisis Management Group

CPD: Consumer Protection Division

COBR: Cabinet Office Briefing Room

COBR Unit: Cabinet Office Briefing Room Unit

CRIP: Common Recognised Information Picture

DAERA: Department of Agriculture, Environment and Rural Affairs

DAFM: Department of Agriculture, Food, and the Marine

DCLG: Department of Communities and Local Government

Defra: Department for Environment and Rural Affairs

DHSC: Department of Health and Social Care

DLUHC: Department for Levelling-up, Housing and Communities

EA: Environment Agency
ECCW: Emergency Co-ordination Centre Wales
EPRRB: FSA's Emergency Preparedness, Resilience and Response Board
FAFA: Food Alert for Action
FBO: Food Business Operator
FCO: Foreign and Commonwealth Office
FSA: Food Standards Agency
FSAI: Food Safety Authority of Ireland
FSANI: Food Standards Agency Northern Ireland
FSAW: Food Standards Agency Wales
FSS: Food Standards Scotland
HMG: His Majesty's Government
HO: Home Office
ICA: Incident Classification Assessment
IMP: Incident Management Plan
INFOSAN: International Food Safety Authorities Network
IMCG: Incident Management and Co-ordination Group
IRSG: Incident Review Sub-Group
ISR: Incident Situation Report
IRU: Incident and Resilience Unit
LA: Local Authority
LGD: Lead Government Department
LIMR: Lessons Identified Management Register
Teams: Microsoft Teams
NCA: National Crime Agency
NCC: News Co-ordination Centre
NFCU: National Food Crime Unit
NGOs: Non-Government Organisations
NSC: National Security Council
OGDs: Other Government Departments
PA: Primary Authority
PHW: Public Health Wales
PHA: Public Health Authority
RAU: Risk Assessment Unit
RAM: Receipt and Management System
RCA: Root Cause Analysis
RIMP: Routine Incident Management Plan
RoI: Republic of Ireland
RPA: Rural Payments Agency
SAGE: Scientific Advisory Group for Emergencies
SEPA: Scottish Environment Protection Agency
SGoRR: Scottish Government Resilience Room
SID: Strategic Incident Director
SIOG: Strategic Incident Oversight Group
SIT REP: Situational Report
SOP: Standard Operating Procedures
STAC: Scientific and Technical Advisory Cells
UKHSA: United Kingdom Health Security Agency
WHO: World Health Organisation
WRF: Welsh Government Resilience Forum

Outbreak: "an incident in which two or more people experiencing a similar illness are linked in time or place; a greater than expected rate of infection compared with the usual background rate for the place and time where the outbreak has occurred; a single case for certain rare diseases such as diphtheria, botulism, rabies, viral haemorrhagic fever or polio."

Public Health England Communicable disease outbreak management – with separate guidance for:

- [England](#)
- [UKHSA](#)
- [Wales](#)
- [Northern Ireland](#)
- [Scotland - guidance on the management of outbreaks of foodborne illness in Scotland](#)

Public health authorities in UK nations: UKHSA ([footnote 1](#)), Public Health Wales, Public Health Agency (NI), [Public Health Scotland](#). For UK-wide outbreaks United Kingdom Health Security Agency (UKHSA) usually takes the lead, working closely with health departments in other UK Nations, unless mutually agreed otherwise.

1. Responsible for health protection operations

[Yn ôl i'r brig](#)