

Incident Management Plan: incident review and exercise planning

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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.