

# Incident Management Plan: Annex A – Routine (Operational) incident management

Incidents Team response to routine incidents.

## Incidents Team response to routine incidents

1. The Incident Team in England, Consumer Protection Teams in Wales and Northern Ireland provide the administrative and investigative lead for all food and/or feed-related incidents.
2. The Head of Incidents / Incident Management/ Consumer Protection will usually act as the Incident Manager (depending on the nature or scope of the incident) and ensures that the relevant Teams meet their responsibilities for incident handling throughout the duration of an incident.
3. The Head of IRU (or equivalent position in Wales and Northern Ireland) will decide, based on the information available, 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.
4. The scale and impact of an incident will affect the level of the FSA's response, even at routine and operational management level. At the routine incident response level the following actions may be required by the relevant teams in order to respond to and remediate an incident:
  1. The Incidents team issues notices (Food Alerts for Action [FAFAs], Product Recalls and Allergy Alerts); issues INFOSAN; logs incidents; and provides IMCG administrative support such as development of the Situational Report.
  2. Developing Comms strategy and reactive and proactive lines.
  3. Requirement for a Questions & Answers (Q&A) document
  4. Conduct sampling/surveillance including surveys and monitoring.
  5. Involvement of Field Operations as required.
  6. Involvement of NFCU where there is organised crime or food fraud concerns or where online investigations may be required.

## Incident Classification Assessment (ICA)

5. The ICA prioritises and classifies an incident. It is a decision-making process that ensures all the factors relevant to determining the nature of an incident are considered. It is auditable and allows strategic and tactical decisions to be recorded in a structured way. It is not a scientific methodology for assessing and quantifying risk.
6. The initial assessment will be largely down to the Incident Team in England and consumer protection teams in Wales and Northern Ireland, with oversight from the Incident Manager. They make decisions by applying a process of set criteria indicators and using their professional judgement. The ICA criteria indicators are:
  - Ability to implement interventions to reduce concern.
  - Concern levels
  - Consumer groups affected.
  - Efficacy of product identification and withdrawal or recall of product.

- Food integrity risk
- Health impacts
- Health security risk
- International engagement
- Known incident hazard type.
- Media perceived risk
- Number of product or scale of distribution
- Political concern

7. The assessment may require input from policy experts, risk assessment and analytical experts both internal and external (internal FSA policy teams, Other Government Departments (OGDs, and key stakeholders). The ICA will be updated and reviewed as further evidence and information becomes available. For all incidents (routine and non-routine) the Incident Manager oversees the ICA to help assess the impact and scale of the incident.

8. The presence, or suspected presence, of food crime issues might not impact on the seriousness of an incident from a food safety perspective. However, it may present heightened complexities from a point of view of evidence capturing or operational co-ordination, both internally and externally. In such circumstances, NFCU would get involved at an early juncture to allow for a joined-up approach and appropriate consideration of evidence capture and other aspects of the investigative approach to be carried out in an appropriate way.

## Incident classification description

9. An incident response may also be activated for food chain integrity, food authenticity, food crime issues, Business Continuity, health security risks arising as a result of food or as part of a co-ordinated response to a serious localised or non-localised (for example, national) outbreak. Such outbreak responses are led by the [public health authority](#) in each UK nation and those relating to animal health are led by the Animal Health and Plant Health Agency (APHA).

10. The FSA Incidents Teams assigns an 'incident classification' by recognising and understanding the suspected impact of an incident and then considering how the incident should be managed in terms of levels of resource and authority.

11. Based on the principles of escalation in incident management, this plan recognises three levels of non-routine incident classification. These are categorised as "Major", "Severe" and "Serious". The level of magnitude of an incident will see a greater involvement of senior FSA staff, and strategic measures that are required in addition to the tactical and operational measures that are required during an incident categorised as serious, or routine. Escalation under to non-routine may be required even when the FSA is not the Lead Government Department (LGD).

## Classification description

12. Routine incidents are the vast number of incidents that are reported to the FSA that are managed at an operational level using everyday resources and procedures. They may involve evidence of illness, impact on vulnerable groups, breaches of statutory limits or non-compliance. They may also include pollution events, cases of Animal disease infection, contamination etc which have an actual or potentially serious impact on food and feed. In some cases, the public or media are likely to express some concern.

13. Non-routine incidents in the FSA are classified as serious, severe, or major.

14. Serious incidents are those incidents which cannot be dealt with using everyday resources and procedures. They require decision making and resource allocation to be made at a higher level and require the invocation of the Incident Management & Co-ordination Group (IMCG) see

section 3.7. These are usually dealt with at a tactical response level.

15. Severe incidents are those incidents which require strategic level input and support by the invocation of the Strategic Incident Oversight Group (SIOG) see section 3.15. Incidents of this type requires significant cross-departmental collaboration and a communications strategy. These have a significant impact on resources and may need strategic direction to remediate.

16. Major incidents are those incidents of such significance they require a central government co-ordinated response. Depending on the nature of the incident the FSA may assume various responsibilities including acting as the LGD.

17. FSA incident classification relates to the central government emergency classification. The responsibilities for leading incidents, escalation decisions and lines of accountability for incident classification levels are shown below. The strategic direction and tactical management during an incident is subject to continuous review and adjustment.

## **Lines of responsibility, accountability and command and control arrangements for incident classification in England, Wales and Northern Ireland [\(footnote 1\)](#)**

### **1. Routine:**

Who is the Incident lead?

- Incident Manager
- Heads of Incidents/Consumer Protection Division (CPD) in England, Northern Ireland & Wales

Who decides escalation and classification of incident?

- Head of IRU (England and national impact incident)
- Heads of Incidents / Incident Management or CPD (Wales and Northern Ireland).

Who is accountable for escalation and classification of incident?

- FSA Director of Operations (England and national impact incident)
- FSA Director for Northern Ireland and/or FSA Director of Wales.

Command & Control arrangements (at operational stage):

- Issues notices (Food Alert for Action [FAFA], recalls and allergy alerts)
- INFOSAN
- Routine IMCG administrative support
- Production of SitRep, briefing and Q&A
- Developing communications strategy (including proactive and reactive lines)

### **2. Serious:**

Who is the Incident lead?

- IMCG
- IMCG Chair
- Incident Manager.

Who decides escalation and classification of incident?

- IMCG
- Chair of IMCG
- Incident Manager.

Who is accountable for escalation and classification of incident?

- FSA Director of Operations (England and national impact incident)
- FSA Director for Northern Ireland and/or FSA Director of Wales

Command & Control arrangements:

- IMCG chair will be relevant subject matter expert agreed by Director of Operations or other appointed Strategic Incident Director
- Tactical application of operational strategy set by SIOG (when severe or major)
- Sets Daily Meeting Rhythm
- Reviews risk assessment and risk management advice
- Decides risk management strategies.
- Establishes the need for stakeholder and OGDs meetings.
- Co-ordinates situational awareness and Situational Report (SitRep).
- Decides a communications strategy.
- Confirms operational leads.
- Confirms financial resources – rotation and deployment.
- Review's media lines and clears media strategies for tactical level incident.

### 3. Severe:

Who is the Incident lead?

- SIOG (strategic)
- Strategic Incident Director (SID / SIOG Chair) (this is a Director most relevant to the incident)
- IMCG (tactical)
- Chair of IMCG
- Incident Manager

Who decides escalation and classification of incident to SIOG?

- Strategic Incident Director (SID)
- IMCG Chair provides written problem statement that sets out the facts, impacts and the evidence base or data being used as the rationale for the escalation to inform the discussion

If further escalation is required to COBR - COBR Unit (to be notified by FSA SID if appropriate)

Who is accountable for escalation and classification of incident?

- Strategic Incident Director (SID)

Command and Control arrangements:

- Chaired by Strategic Incident Director – appointed by CEO.
- Sets FSA strategy (severe and major) and has a stock take role.
- Answers strategic questions [Daily Rhythm](#) to establish FSA's strategic response.
- Meets according to daily rhythm.
- Liaises with (and includes) OGDs equivalents as required.

### 4. Major:

Who is the Incident lead?

- SIOG (strategic)
- Strategic Incident Director (SID) (The CEO may appointment themselves at this level)
- IMCG (tactical)
- Chair of IMCG
- Incident Manager

Who decides escalation and classification of incident?

- COBR Unit

Who is accountable for escalation and classification of incident?

- FSA Chief Executive Officer
- Westminster government ministers and devolved government ministers.

Command and Control arrangements:

- Co-ordinates the central government response.
- CRIP
- Cabinet Office convene COBR and invite FSA. FSA attendance decided by CEO/Chair.
- DHSC Minister leads. FSA officials' brief ministers and attend officials meeting
  
- In the event of a COBR (O) or COBR (M), the most relevant party with expertise to the situation would attend.

## **How the scale of impact affects the level of the FSA's response**

18. The information below can assist in determining when an incident should be escalated. A written problem statement should be produced setting out the issue, impacts and options for next steps to aid remediation:

### **1. Media:**

- Serious - increasing regional interest requiring coordinated briefings and statements.
- Severe - Prolonged, national interest requiring intense media monitoring and frequent briefings and statements.
- Major - Sustained national and/or international interest requiring government level statements.

### **2. Public Health:**

- Serious - UK widespread or multi-country cases of serious or prolonged illness, some requiring short term hospitalisation.
- Severe - UK wide or multi-country serious and prolonged illness, high number of deaths or isolated deaths in vulnerable groups
- Major - Widespread national and/or international deaths.

### **3. Industry product:**

- Serious - Several batches affected and/or more widespread 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.
- Major – Widespread national and/or international closures threatening import/export markets and loss of confidence in integrity of food supply chain in the UK.

#### **4. Consumer concern:**

- Serious – Heightened regional loss of confidence in 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 coordinated defensive briefings and statements and/or FSA wide investigation.
- Major – Widespread loss of public / industry / international confidence in the integrity of the food supply chain in the UK.

1. Not an exhaustive list. FSS equivalent classifications referred to as Levels 1 – 4. In line with the FSA/FSS MOU, there may be occasions where FSS lead a UK wide serious incident. In such circumstances, the FSS Incident Management Plan will be followed.