Incident Management Plan for Non-Routine Incidents
Ownership and maintenance of this plan and internal supporting documentation is the responsibility of the Resilience Team, part of the Incidents and Resilience Unit of the Food Standards Agency. This Plan is reviewed on an annual basis. This document was reviewed in April 2021 and is Version 8.

Version 7 of the Non-Routine Incident Management Plan was reviewed in September 2019 for publication in April 2020. However, due to the Covid-19 Pandemic this was delayed. This document has undergone a further review to integrate lessons learned and best practice developed as part of that response.
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Chief Executive Foreword

At the Food Standards Agency’s we are committed to ensuring there is food you can trust. Reacting swiftly and effectively to food and feed incidents is a key part of delivering on that goal.

In 2020/21 the FSA investigated 1,978 food, feed, food contact material and environmental contamination incidents in England, Northern Ireland, and Wales. This decline in the number of notified incidents, from 2478 in 2019/20, was due to the pandemic response and closure of the hospitality sector.

The majority of incidents are dealt with using routine incident management procedures, but when the nature and/or scale of an incident exceeds this scope and meets the criteria for escalation to non-routine, this plan will be invoked.

This plan provides the necessary structures and governance arrangements to enable the FSA to scale up its incident response to manage all types of incident. It also sets out how we now communicate food or feed safety issues with Europe and internationally since the UK exited the EU.

We continue to improve our incident response arrangements through testing and conducting lessons learnt activities. The FSA also routinely participates in cross-government emergency exercises. This plan will continue to evolve to reflect our learning and changes to central government emergency preparedness arrangements. I’m very proud of the way that the FSA handles incidents and learns and embeds lessons from them.

We welcome feedback on the plan as this will contribute to regular reviews and ensure this document continues to be fit for purpose. Should you wish to comment please email the Resilience Team at resilience.planning@food.gov.uk.

Emily Miles
Chief Executive
Food Standards Agency
1: Aim, Objectives and Scope of Plan

1.1 Aim

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, which may arise in connection with the consumption of food (including risks caused by the way it is produced or supplied) in order to protect consumers.

The IMP defines the FSA’s response to a non-routine incident where the FSA takes responsibility, either by statutory requirement (as set out in the Food Law Code of Practice), in its role of Lead Government Department (LGD), following an actual or potential threat to the safety, quality or integrity of food and/or animal feed, or as a supporting department.

The strategic, tactical and operational command structure and the key principles as set out in this plan will also be followed for other incidents, including those that fall outside of our remit, but that require tactical and strategic measures. For example, a business continuity incident; pandemic or other events that disrupts our business.

1.2 Objectives

The plan provides a framework to meet the following objectives:

- ensure robust command and control procedures are in place
- escalation mechanisms are clearly defined
- there is the ability to determine the key parties and resources required to develop, co-ordinate, implement and recover an effective response
- ensure effective communication and co-ordination across all parties.

1.3 Scope of Plan

This plan summarises key activities to be undertaken during a response to a non-routine food and/or feed-related incident or outbreak. Response to other (routine) outbreaks is as set out in the current communicable disease outbreak management: operational guidance. From the 1 October
2020, The UK Health and Security Agency (UKHSA)\textsuperscript{1} will assume health protection operations as part of its remit. The plan establishes common procedures (to be followed by all FSA offices across England, Wales and Northern Ireland) for the command and control set up for the management of the response to a non-routine incident or outbreak. Routine incidents are dealt with using the FSA’s Routine Incident Management Plan (RIMP). The detailed processes which support this IMP are set out in a series of internal Standard Operating Procedures (SOP) and guidance (see Annex A).

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.

\textsuperscript{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.
2: Definition of an incident

The 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 consumers’ interests. Quality should be considered to include food standards, authenticity and composition”.

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.

2.1 Alerting of an incident

Initial alerts may originate from many sources as described below.

**Internal:** An incident may be notified by internal divisions, such as Field Operations or Receipt and Management Team (RAM). An incident may also be identified from intelligence received or generated by the National Food Crime Unit (NFCU). Relevant information which may indicate a food incident should be shared with 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, for example, if a current safety concern relating to food on the market becomes apparent.

**External:** Industry and food business operators (FBOs) report incidents directly to the incidents teams across England, Wales and Northern Ireland via email or via the on-line reporting tool and use the equivalent reporting process for FSS. FSA incidents teams in England, Wales, and Northern Ireland operate a 24/7 response to food and/or feed-related and environmental contamination incidents and can be contacted by telephone and e-mail.

Information on incident reporting is available on the FSA’s website [report an incident](#). FSS has its own reporting process in place as detailed within the [Food Standards Scotland Incident Management Framework](#). Members of the public can report food safety concerns to
the FSA helpline (020 7276 8829) or via email helpline@food.gov.uk.

**Local Authorities (LAs):** LAs have a responsibility under the Food 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.

**Other Government Departments (OGDs):** Some incidents, such as serious outbreaks may also be notified by the public health authority. The FSA is also informed of incidents via OGDs and the emergency services if they consider an incident may potentially impact on food and/or feed safety.

**International:** Another source may be via the International Food Safety Authorities Network (INFOSAN) or Import of Products, Animals, Food and Feed System (IPAFFS). Since the EU Transition on 1 January 2021, the UK is no longer an active member of the EU Commission Rapid Alert System for Food and Feed (RASFF) network. However, the FSA still receives food and feed safety related information where the UK is affected.

On receipt of an incident notification, classification of the incident is carried out by means of an Incident Classification Assessment (ICA), as set out in **section 2.2**.

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 on whether to escalate to non-routine incident classification levels.

### 2.2 Classification of incidents

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.

An incident response may also be activated for food chain integrity, food authenticity, food crime issues 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...
The FSA 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.

This plan recognises four levels of incident classification: routine, serious, severe and major, based on the principle of escalation of management. The higher the level of magnitude of an incident, the greater the involvement of senior FSA staff, and the more tactical and strategic measures are required. Non-routine incidents are routine incidents that have met the required criteria to be escalated to serious or severe. This may be required even when the FSA is not the Lead Government Department (LGD).

2.3 Classification description

Incidents dealt with by the FSA are routine and 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 barn fires or oil and chemical spills, which have an actual or potential impact on food and feed. In some cases, the public or media are likely to express some concern. Non-routine incidents are classified as serious, severe or major.

**Serious** incidents are classified as those matters 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 3.5.

**Severe** incidents are classified as those which require strategic level input and support by the invocation of the Strategic Incident Oversight Group (SIOG) see section 3.8. Incidents of this type requires significant cross-departmental collaboration and a communications strategy and are often longer in duration and have significant impact on resources.

**Major** incidents are classified as those 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.

FSA incident classification relates to the central government emergency classification. Table 1, below, shows responsibilities for leading incidents, escalation decisions and lines of accountability for incident classification levels. The strategic direction, tactical and operational management during an incident is subject to continuous review and adjustment.
### Table 1: Lines of accountability for incident classification ² level

<table>
<thead>
<tr>
<th>Classification</th>
<th>Who is the Incident Lead?</th>
<th>Who decides escalation and classification?</th>
<th>Accountability</th>
</tr>
</thead>
<tbody>
<tr>
<td>Routine</td>
<td>- Incident Manager</td>
<td>- Head of IRU (England and national impact incident)</td>
<td>- FSA Chief Operating Officer (England and national impact incident)</td>
</tr>
<tr>
<td></td>
<td>- Heads of Incidents/Consumer Protection Division (CPD) in England, Northern Ireland &amp; Wales</td>
<td>- Head of Incidents / Incident Management or CPD (Wales and Northern Ireland)</td>
<td>- FSANI and FSAW directors (Northern Ireland and Wales)</td>
</tr>
<tr>
<td></td>
<td>- Equivalents in FSS</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Serious</td>
<td>- IMCG</td>
<td>- IMCG</td>
<td>- FSA Chief Operating Officer (England and national impact incident)</td>
</tr>
<tr>
<td></td>
<td>- Chair of the IMCG</td>
<td>- Chair of IMCG</td>
<td>- FSANI and FSAW Directors (Northern Ireland and Wales)</td>
</tr>
<tr>
<td></td>
<td>- Incident Manager</td>
<td>- Incident Manager</td>
<td></td>
</tr>
<tr>
<td>Severe</td>
<td>- SIOG (strategic)</td>
<td>- Civil Contingencies Secretariat (CCS) to be notified</td>
<td>- FSA Chief Operating Officer</td>
</tr>
<tr>
<td></td>
<td>- Strategic Incident Director (SID) (this can be a Devolved Director)</td>
<td>- SIOG</td>
<td>- SID</td>
</tr>
<tr>
<td></td>
<td>- IMCG (tactical)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Chair of IMCG</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Incident Manager</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Major</td>
<td>- SIOG (strategic)</td>
<td>Not applicable</td>
<td>- FSA Chief Executive</td>
</tr>
<tr>
<td></td>
<td>- Strategic Incident Director (SID)</td>
<td>- Westminster government ministers and devolved government ministers</td>
<td></td>
</tr>
<tr>
<td></td>
<td>- IMCG (tactical)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Chair of IMCG</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>- Incident Manager</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### 2.4 Incident assessment

The purpose of assessing the risk associated with an incident is to determine the potential

² FSS equivalent classifications referred to as Levels 1 – 4.
scale, scope, nature and impact of the incident. There are several components of incident assessment, the main part is the Incident Classification Assessment (ICA).

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.

**Incident Classification Assessment (ICA)**

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.

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:

- Food integrity risk
- Media perceived risk
- Political engagement
- Concern levels
- Number of product or distribution
- Tracking and withdrawal of product
- Consumers affected
- Known incident type
- Health effects.

The assessment may require input from policy experts, risk assessment and analytical experts both internal and external (internal FSA policy teams and Other Government Departments (OGDs)). The ICA will be updated 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.
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.

**Risk management**

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. Done in consultation with all interested parties, considering risk assessment and other factors relevant for the health protection of consumers and for the promotion of fair-trade practices, and, if needed, selecting appropriate prevention and control options.

**Health-based risk assessment**

A scientific risk assessment will be undertaken in order 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. They liaise with the relevant policy teams, who will commission a risk assessment from the Risk Assessment Unit (RAU), if required. The involvement of ODGs such as Department of Health and Social Care (DHSC) or Department of Environment and Rural Affairs (DEFRA) may be required. 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.
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**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 probability 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.

### 2.5 Criteria for escalation

Making sure the incident is managed at the appropriate level is key to a successful incident response.

Escalation of incident response levels is driven by the nature, scale, scope and impact of incidents coupled with the expectations of the FSA to respond. Escalation to non-routine should be considered even when the FSA is not the LGD as a strategic/tactical response may still be required (with SIOG alerted). An example of this may be an animal health related incident (for example, infectious and/or notifiable disease). The flowchart (Figure 1) below displays the incident escalation process from routine to non-routine and includes:

- Incident notification
- Risk assessment and Risk management (if required)
- Consider whether to escalate the incident to non-routine based on the evidence
- Where escalation is not required, the incident continues as routine and follows the usual process
- Where Escalation to non-routine incident has been agreed and its classification status (Severe or Major) is decided.
**Figure 1: Incident escalation process**

**Rapid escalation:** In the case of an obvious severe incident the escalation steps may be taken rapidly. The Head of Incidents and Resilience Unit (IRU) will notify the Chief Operating Officer, the Chief Executive and the directors for Wales and Northern Ireland. It is still important in these instances to make sure the correct incident set up process is carried out.

**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 welfare or serious damage to the environment. 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 Civil Contingencies Secretariat (CCS) who then decide whether a central co-ordinated government response is required, and Cabinet Office Briefing Room
Food Standards Agency – Non-Routine Incident Management Plan (COBR) should be activated or devolved equivalents.

Escalation to International stakeholders: In the event of a major food- or feed- related incident, occurring at international level, the Incident teams are responsible for the coordination of communication at an EU and international level.

Table 2 provides an illustration of how scale of impact affects the scale of the FSA’s response. The table offers indicative examples to demonstrate how influences apply.

**Table 2: Matrix showing how FSA incident classification may be applied with examples of impacts.**

<table>
<thead>
<tr>
<th>Issue/classification</th>
<th>Routine</th>
<th>Serious</th>
<th>Severe</th>
<th>Major</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Media</strong></td>
<td>Short lived local interest requiring brief statement</td>
<td>Increasing regional interest requiring co-ordinated briefings and statements</td>
<td>Prolonged, national interest requiring intense media monitoring and frequent briefings and statements</td>
<td>Sustained national and/or international interest requiring government level statements</td>
</tr>
<tr>
<td><strong>Public health</strong></td>
<td>Localised or serious or widespread cases of illness, some requiring short term and/or low numbers of hospitalisation</td>
<td>UK widespread or multi-country cases of serious or prolonged illness, some requiring short term hospitalisation</td>
<td>UK wide or multi-country serious and prolonged illness, high number of deaths or isolated deaths in vulnerable groups</td>
<td>Widespread national and/or international deaths</td>
</tr>
<tr>
<td><strong>Industry product</strong></td>
<td>Can be 1 small batch affected from a single source requiring simple remedial action or several batches affected from</td>
<td>Several batches affected and/or more widespread issues with compliance from several sources requiring closure</td>
<td>Numerous to widespread batches affected, requiring several plant closures for detailed investigation or</td>
<td>Widespread national and/or international closures threatening import/export markets and loss</td>
</tr>
<tr>
<td>Issue/classification</td>
<td>Routine</td>
<td>Serious</td>
<td>Severe</td>
<td>Major</td>
</tr>
<tr>
<td>----------------------</td>
<td>----------------------------------------------</td>
<td>---------------------------------------------------</td>
<td>--------------------------------------------------</td>
<td>--------------------------------------------------</td>
</tr>
<tr>
<td></td>
<td>several sources requiring remedial action to remove from food chain</td>
<td>of plant(s)</td>
<td>multi-country impact</td>
<td>of confidence in integrity of food supply chain in the UK</td>
</tr>
<tr>
<td>Consumer concern</td>
<td>Short term, local consumer concern requiring routine investigation and a brief statement of reassurance</td>
<td>Heightened regional loss of confidence in one or some aspects of the food chain requiring specific internal investigations</td>
<td>Significant national loss of confidence in aspects of the integrity of the food supply chain in the UK requiring co-ordinated defensive briefings and statements and/or FSA wide investigation</td>
<td>Widespread loss of public / industry / international confidence in the integrity of the food supply chain in the UK</td>
</tr>
</tbody>
</table>

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

3.1 Command and Control set up for non-routine incident

Once an Incident has been escalated and/or declared as non-routine the following basic principles apply when setting up the command-and-control structure. These arrangements can be scaled up to manage large incidents that fall outside our remit but require both a tactical and strategic response.

The FSA operates a uniform incident response structure, applying these procedures coherently across England, Wales and Northern Ireland. The FSA incident response teams located in each FSA’s office lead the response to routine or serious incidents within their area.
Food Standards Agency – Non-Routine Incident Management Plan depending on the geographical area affected. FSS, following their own procedures, lead on incidents within their country and work closely with the FSA.

If an incident originates in Scotland or is initially led by FSS and escalates to a UK-wide incident, the FSS will continue to lead the incident, unless it is mutually agreed that it is more appropriate for the FSA to lead. This arrangement ensures the FSA/FSS maintains the capability and credibility to access local intelligence and liaise on cross-border issues. The Food Standards Scotland Incident Management Framework, defines how incidents contained within Scotland are managed. For UK-wide outbreaks Public Health England (PHE) takes the lead, working closely with health departments in other UK Nations.

The roles and responsibilities for non-routine incidents sets out the various roles that may be required during a non-routine incident and sets out the purpose of each of those roles.

### 3.2 Incidents Team response

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.

The Head of Incidents / Incident Management/ Consumer Protection will usually act as the Incident Manager (depending on the nature of the incident) and ensures that the relevant Teams meet their responsibilities for incident handling throughout the duration of an incident.

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 in order to manage and co-ordinate the response at a tactical level.

### 3.3 Incident Manager

Depending on the nature of an incident, one of the following may be appointed as the Incident Manager: the Head of Incident and Resilience Unit (IRU), the Head of Incident Management in Wales, to the Head of Consumer Protection in Northern Ireland; the Head of Division or the head of a policy team with responsibility for the issue. The Incident Manager is
If links are made with an ongoing NFCU investigation, it may be that the lead for this investigation and the Incident Manager need to establish a close working relationship in terms of ensuring that the respective objectives of risk mitigation and effective investigative progression can both be met.

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.

The role of the Incident Manager is deliberately separate to that of the IMCG Chair, although the same person can carry out both roles depending on the scope and scale of an incident. The Incident Manager will work in synergy with the IMCG Chair.

### 3.4 Incident Response Meeting Secretariat

For **non-routine incidents**, the Incident Response Meeting Secretariat will issue a calling notice for the IMCG meeting or a SIOG meeting. Representation from the FSA offices in Wales and Northern Ireland will be included.

Meetings are virtual by default, and the standard calling notice includes details of conference call dial in procedures or video conference arrangements. The incident response meeting secretariat instructions contains more information on the Incident Secretariat.

### 3.5 Incident Management and Co-ordination Group (IMCG)

The IMCG manage and co-ordinate the response at a tactical level for non-routine incidents. For Severe and Major incidents, the IMCG will have a role in implementing the strategy directed by the Strategic Incident Oversight Group (SIOG). Membership of the IMCG will be decided depending on the classification level and location of the incident (I.E. FSS will be invited if the UK-wide incident has an impact in Scotland). The higher the level of
For serious incidents and above, the IMCG will consider the battle rhythm/meeting frequency, make decisions on the setting up of the Briefing Cell and the Emergency Call Handling Centre (also known as the incidents hotline) as required and the set-up of any stakeholder liaison meetings. In addition, it will also consider creating operational leads, staff resourcing, financing; and setting taskforces to manage operational work streams.

The IMCG may consider further escalation or notification to the Civil Contingencies Secretariat (CCS). The IMCG will be maintained for the duration of non-routine incidents.

The purpose, membership, and example agenda for the IMCG are set out in the Incident Management & Co-ordination Group Standard Operating Procedure.

### 3.6 Briefing Cell

The purpose of the Briefing Cell (BC) is to provide a dedicated resource to support senior managers in responding to the incident. The BC will collate all the relevant information for the incident, develop the situation report (SitRep), as well as standard lines to take for responding to other government departments, wider stakeholders and industry. In addition, the BC will draft briefing documents, prepare ministerial submissions and respond to Parliamentary questions as required.

### 3.7 Incident Management Co-ordination Group Chair (IMCG)

The IMCG chair will be the Head of IRU, or one of the following - the Head of Incidents, the Head of Incident Management in Wales or Head of Consumer Protection in Northern Ireland.

For serious incidents where there is no Strategic Incident Overview Group (SIOG) established and therefore no Strategic Incident Director (SID), the IMCG chair will be appointed by and accountable to the Chief Operating Officer.

In severe and major incidents where SIOG is established with a SID, the IMCG chair will be
Food Standards Agency – Non-Routine Incident Management Plan accountable to the SID. The IMCG chair will work with the appointed Incident Manager to agree the key determinants of the incident management process.

The IMCG chair shall also ensure that plans for communications with external stakeholders, for example, OGDs, LAs, Primary Authorities (PAs) - where appropriate, industry and consumer groups, are in place so that they are engaged, as and where appropriate. For more information on FSA Communications and Engagement see Section 5.

3.8 Strategic Incident Oversight Group (SIOG)

The objective of the group is to set strategy and have oversight of incidents classified as Severe and above. The group’s deliberations are around six key and predefined strategic questions. The SIOG strategy will be passed to the IMCG for implementation and any requirements for update reports will be set.

SIOG will be involved in decisions such as interaction with Cabinet Office Briefing Room (COBR) (or its devolved equivalent) attendance and will establish strategic level cross-government lines of communication.

The purpose, membership, example agenda and template meeting note for the group are set out in the Strategic Incident Oversight Group Standard Operating Procedure. Senior members of FSS will be invited to attend where appropriate.

3.9 Strategic Incident Director (SID)

The SID is responsible for the strategic oversight of the incident. The SID is appointed by the Chief Executive and will usually be the director most relevant to the incident. The SID is responsible for activating the strategic management structure, including convening the SIOG which they will then chair and providing updates to the Chief Executive.

The SID will convene briefing or stock-take meetings with their counterparts in OGDs as necessary and in co-ordination with SIOG meeting timings and the incident response battle rhythm.
3.10 Operational cascade briefings

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 sharing the outcomes of these briefings with their colleagues.

As part of the battle rhythm, 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.

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

3.11 Battle rhythm

The battle rhythm is the daily 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. The battle rhythm sets out the sequence of events preceding meetings and the processes that follow meetings at the tactical and strategic levels. Although the battle 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 their control and command structure.

It should be noted that when COBR or its equivalents in Wales and Northern Ireland are convened, the battle 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 Central Government Concept of Operations (CONOPs).
3.12 Resilience during protracted incidents

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 such that staff can be rotated, and rest periods provided for key staff. Rotation of staff should be co-ordinated, with handover procedures put in place.

A flexible approach will be employed between FSA Incidents Teams in the three countries (and in liaison with the FSS) to address resource shortfalls. 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 a decision may be taken to secure additional external resource from outside the FSA.

3.13 De-escalation and closure

As the incident draws towards resolution, it may be appropriate to de-escalate to a lower Level, to return completely to routine business or close the incident. De-escalation will be based upon agreed criteria and the agreed criteria being met to inform the decision to de-escalate. The decision will be taken by SIOG and IMCG collectively. The flowchart (Figure 2) below displays the incident de-escalation process from non-routine to routine or closure and includes:

- Consider whether the incident has met the criteria for de-escalation from non-routine
- The de-escalation criteria has not been met the incident continues as non-routine and follows the usual process
- Where the de-escalation criteria has been met and agreed by SIOG and IMCG, the incidents classification status will return to routine or, if appropriate, closed.

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.

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
Food Standards Agency – Non-Routine Incident Management Plan
consideration, are radiological incidents and other environmental contamination affecting
food. Recovery for major incidents should follow the procedures set out in the CONOPs
using command and control arrangements in place for a major incident.

Once closed, all non-routine incidents are subject to incident review – see Section 6 incident
review and planning.

If an incident is closed (owing to the mitigation of any risk to the public from unsafe food
being on the market), it is possible that an investigation by NFCU may continue to explore
any potential criminal offences associated with the subject of the incident. This should not
require the continuation of IMCG or incident management processes, but the potential
requirement to procure and exhibit material held by FSA staff and others, which could be
relevant to the ongoing investigation, should be held in mind. A form of regular ongoing co-
ordination or briefing between incidents team and NFCU may be appropriate.

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![Incident de-escalation process](image_url)

**Figure 2: Incident de-escalation process**
Food Standards Agency – Non-Routine Incident Management Plan

**Information management**

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.

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

**Table 3: Command and control arrangements for FSA incident response at all levels**

<table>
<thead>
<tr>
<th>Incident classification</th>
<th>Command and control arrangements</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Central Government Emergency Response (major)</strong></td>
<td>• Co-ordinates the central government response.</td>
</tr>
<tr>
<td></td>
<td>• CRIP</td>
</tr>
<tr>
<td></td>
<td>• Cabinet Office convene COBR and invite FSA. FSA attendance decided by SIOG.</td>
</tr>
<tr>
<td></td>
<td>• DHSC Minister leads. FSA officials brief ministers and attend officials meeting.</td>
</tr>
<tr>
<td><strong>Strategic Incident Oversight Group (severe)</strong></td>
<td>• Chaired by Strategic Incident Director – appointed by CEO.</td>
</tr>
<tr>
<td></td>
<td>• Sets FSA strategy (severe and major) and has a stocktake role.</td>
</tr>
<tr>
<td></td>
<td>• Answers the six strategic questions to establish FSA’s strategic response.</td>
</tr>
<tr>
<td></td>
<td>• Meets according to battle rhythm</td>
</tr>
<tr>
<td></td>
<td>• Liaises with OGDs equivalents as required.</td>
</tr>
<tr>
<td><strong>Incident Management and Co-ordination Group (serious)</strong></td>
<td>• Chair agreed by CEO.</td>
</tr>
<tr>
<td></td>
<td>• Sets incident’s battle rhythm.</td>
</tr>
<tr>
<td></td>
<td>• Tactical application of SIOG’s strategy (when severe or major incident)</td>
</tr>
<tr>
<td></td>
<td>• Reviews risk assessment and risk management advice</td>
</tr>
<tr>
<td></td>
<td>• Decides risk management strategies</td>
</tr>
</tbody>
</table>
### Incident classification

<table>
<thead>
<tr>
<th>Command and control arrangements</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Agrees the need for a Briefing Cell</td>
</tr>
<tr>
<td>• Establishes the need for stakeholder and OGDs meetings</td>
</tr>
<tr>
<td>• Receives SitRep.</td>
</tr>
<tr>
<td>• Decides a communications strategy</td>
</tr>
<tr>
<td>• Confirms operational leads</td>
</tr>
<tr>
<td>• Confirms financial resources – rotation and deployment</td>
</tr>
<tr>
<td>• Review’s media lines and clears media strategies for tactical level incidents.</td>
</tr>
</tbody>
</table>

### Routine incidents and operational management

<table>
<thead>
<tr>
<th>Command and control arrangements</th>
</tr>
</thead>
<tbody>
<tr>
<td>• The Incidents team: issues INFOSAN; issues notices (Food Alerts for Action [FAFAs], recalls and allergy alerts); logs incidents; and provides IMCG administrative support.</td>
</tr>
<tr>
<td>• Operating the Briefing Cell (SitRep owner, Q&amp;A, briefing).</td>
</tr>
<tr>
<td>• Developing Comms strategy and reactive and proactive lines.</td>
</tr>
<tr>
<td>• Conduct sampling/surveillance including surveys and monitoring.</td>
</tr>
<tr>
<td>• Involvement of Field Operations as required.</td>
</tr>
<tr>
<td>• Involvement of NFCU where there is organised crime or food fraud concerns or where online investigations may be required.</td>
</tr>
</tbody>
</table>

### 4: Major incidents - UK government response

If an incident is serious enough to threaten a wide and/or prolonged impact requiring central
Food Standards Agency – Non-Routine Incident Management Plan

government co-ordination and support from several departments and agencies the central
government response would be co-ordinated from the Cabinet Office under the leadership of
a Lead Government Department (LGD). Central government will manage this response in
accordance with the Central Government Concept of Operations (CONOPs), 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.

The Cabinet Office, in consultation with No.10 and the LGD, will decide whether an
emergency response should be co-ordinated by central government. The SIOG with input
from the IMCG, decide when during an incident to notify the Civil Contingencies Secretariat
(CCS).

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).

Activation of the Cabinet Office Briefing Rooms (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.

The FSA Chief Executive 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 will decide who will attend.

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 CCS.

Where FSA is considered the LGD for an incident affecting Wales or Northern Ireland, the
FSA Director with responsibility for Wales/Northern Ireland may attend the relevant COBR
Food Standards Agency – Non-Routine Incident Management Plan equivalent. There may be also occasions where another department is lead but the FSA presence at COBR is required to support the cross-government response.

Further detail on central government emergency response arrangements is set out in Annex B – UK Government Response: description of emergency response arrangements and how they apply. The Annex 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 1: FSA command and control interface with national emergency structures

How the FSA command and control structure links to central government response is shown in the above diagram (Figure 3), which sets out the emergency response mechanisms across central government in relation to the FSA’s incident response at strategic, tactical and operational levels.
5: Communications and engagement

5.1 Communications

Communication during an incident is key, not just to the public but to other stakeholders too, whether they are industry, consumer groups, the media, LAs, Government Ministers or other national or international agencies. The FSA is committed to being as open as possible about what we do and why we are doing it. The FSA will, as a principle:

- give consumers and stakeholders suitable information where they need to act
- be open about emerging incidents and what the FSA is doing to investigate them, even if we do not know the source
- provide 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

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 OGDs, Non-Government Organisations (NGOs) and LAs.

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 FSS to ensure that messages are consistent.

Communications approaches
In any high profile incident that relates to food or feed, there are a variety of people who need to be kept informed. They include:

**Consumers**

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

The FSA will also consider whether to give the public information about an ongoing incident even if the cause is not known, if 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.

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 FBO involved has taken/is taking (for example, to remove the product from sale) and give advice if they have the affected product or have already consumed it.

**Industry and local authorities**

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.

On occasion, the FSA may still feel it necessary to publish a news story when the relevant FBOs are taking all the appropriate action in withdrawing or recalling an affected product. This may be the case if, for instance, public interest is high.

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

**FSA staff and FSA Board**

We will use our internal communications channels to ensure we keep staff informed of
Food Standards Agency – Non-Routine Incident Management Plan
developments in major incidents.

We will provide updates to the FSA Board as necessary and through agreed channels.

5.2 Engagement

Linking to Other Government Departments (OGD) and Agencies

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.

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.

Often, OGDs will lead on specific incidents, for example DHSC and relevant public health authority will lead on the public health impacts of foodborne illness outbreaks. In these instances, the FSA command and control structure will 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 when dealing with food contamination during a foodborne outbreak.

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 or arranging exchange of information through sharing of incident Sit-Reps. The Stakeholder Management Plan contains further details.

5.3 Linking to Local Authorities (LA)

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

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.

The decision on taking legal action against an FBO will need to be made in accordance with 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.

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

Enforcement action may take place through activity linked to a food crime investigation by NFCU, whether undertaken with partners or unilaterally.

There are instances where enforcement activities may be required in liaison with other government operational partners, such as DEFRA’s agencies or DAERA. In these cases, the FSA will work closely with partners through the mechanisms outlined above.
Figure 2: FSA enforcement partners

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.

**International links**

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.

The FSA’s Incidents Team is the national contact point 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.
INFOSAN, is used to exchange information on serious risks to public health in relation to food and feed which might impact on other countries, its function is based on International Health Regulations 2005, is an international system operating outside of the EU law.

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.

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.

### 6: Incident Review and Exercise Planning

#### 6.1 Incident review

A review process, including RCA methodology, will take place for those non-routine incidents where lessons have been identified.

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

It delegates functions relating to incident review planning 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.

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

Table 4: Timescales for incident review type

<table>
<thead>
<tr>
<th>Review type</th>
<th>Timescale</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hot wash up or hot debrief</td>
<td>Within two weeks after the incident has been closed or period of duty if incident is protracted with responders (at each location).</td>
</tr>
<tr>
<td>Organisational debrief (cold debrief)</td>
<td>Within eight months post-incident.</td>
</tr>
<tr>
<td>Multi-agency debrief (cold debrief)</td>
<td>Within four to six weeks post-incident.</td>
</tr>
<tr>
<td>Third party post-incident report</td>
<td>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.</td>
</tr>
</tbody>
</table>

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.

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

6.2 Root Cause Analysis

Root Cause Analysis (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. Thus, it provides a better understanding of when, why, and how food safety incidents occur in accordance with the Food Law Code of Practice (England) 5.2.5.

Alongside other bodies of work, the FSA encourages FBOs to conduct RCA after a food incident has occurred (especially when a recall of a product(s) was required) and share the
Food Standards Agency – Non-Routine Incident Management Plan

Learnings. This helps the FSA to identify emerging incident causal factors, best practice and working with industry/enforcement bodies to mitigate future incidents.

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.

6.3 Exercise Planning

The FSA builds and embeds lessons learned from exercising and drilling as well as from reviews of incidents to continuously improve organisational-wide incident resilience and capability.

The EPRRB oversees the FSA’s emergency exercise programme which includes a training and drilling programme. The programme includes participation in exercises led by OGDs.

The FSA exercise programme has two basic aims:

- to exercise the FSA IMP and associated 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.

Post exercise reports are produced, and any actions added to the Central Actions Log (CAL) which is monitored by EPRRB.
Glossary

- AAC Administrative Assistance and Co-operation platform
- APHA Animal Health and Plant Health Agency
- BAU Business as Usual
- BEIS Business Energy and Industrial Strategy
- CAL Central Actions Log
- CCGNI Civil Contingencies Group Northern Ireland
- CCS Civil Contingencies Secretariat
- CEFAS Centre for Environment, Fisheries and Aquaculture Science
- CMG Crisis Management Group
- CPD Consumer Protection Division
- COBR Cabinet Office Briefing Room
- CONOPs Central Government Concept of Operations
- 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 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
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- HO Home Office
- ICA Incident Classification Assessment
- IMP Incident Management Plan
- INFOSAN International Food Safety Authorities Network
- IMCG Incident Management & Co-ordination Group
- IRSG Incident Review Sub-Group
- ISR Incident Situation Report
- IRU Incident and Resilience Unit
- LA Local Authority
- LGD Lead Government Department
- 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
- PHE Public Health England
- 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
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: operational guidance – with separate guidance for:

- England
- UKHSA
- Wales
- Northern Ireland
- Scotland

Public health authorities in UK nations: UKHSA³, Public Health Wales, Public Health Agency (NI), Public Health Scotland.

³ responsible for health protection operations.
Annex A – Standard Operating Procedures and guidance that supports the Incident Management Plan for Non-Routine incidents

- Bird Table Meetings
- Briefing Cell
- Foodborne Outbreaks
- Food Defence
- Incident Escalation Assessment Hotline (Emergency Call Centre)
- Incident Management & Coordination Group (IMCG)
- Incidents Response Meeting Secretariat Instructions
- International Food Safety Authorities Network (INFOSAN) Operational Communications
- Operational Cascade Briefings
- Stakeholder Liaison Meetings
- Strategic Incident Oversight Group (SIOG)
- Radiological
- Roles and Responsibilities for Non-Routine Incidents
- Routine Incidents Management Plan (RIMP)
Annex B – UK government response – description of main structures and arrangements

The Cabinet Office Briefing Rooms (COBR) may be activated in order to facilitate rapid coordination of the central Government response and effective decision making. Where COBR has been activated and there are food safety issues, the Parliamentary Under-Secretary of State for Public Health will normally represent the FSA at Ministerial level COBR meetings.

The FSA Chief Executive or designated deputy will brief the Minister in advance of that meeting. The FSA will also seek an invitation for the FSA Chair to attend Ministerial meetings.

If an Officials-Level COBR is set up, then FSA participation would be expected at the meeting and an invitation would be received from the CCS. FSA representation at a COBR Officials meeting would be similar to that provided for the Ministerial COBR briefing.

How COBR operates depends on the nature of the incident. The FSA is listed by the Cabinet Office as the government department responsible for planning, response and recovery for food contamination emergencies in all four UK Nations. In England, this responsibility is shared with DHSC.

Where FSA is considered the LGD, the expectation is that FSA will have a presence at both COBR meetings and equivalents in all UK Nations. As a non-ministerial department, it is likely that the FSA will be designated as the lead agency for a food contamination event but will be unlikely to chair COBR. This is likely to be the department most impacted by the event and where another Department takes the lead the FSA’s presence will be required to support the cross-Government response.

The Home Office (HO) is the LGD for terrorist related emergencies in England, Scotland and Wales and will lead, at least initially, on wider impacts of the incidents in England with support from OGDs, as necessary. This includes incidents where food is involved or implicated although FSA expertise will be required to support the response. For terrorist
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related emergencies taking place in Scotland, Wales, or Northern Ireland, then the Secretary of State for Scotland, Wales or Northern Ireland will attend any resulting meetings of COBR.

The LGD performs a number of roles and the Cabinet Office publishes guidance on the **Role of the Lead Government Department in Planning and Managing Crisis**. The Cabinet Office also carries out routine Central Government Emergency Response training courses and it is recommended that officials who may represent the FSA at COBR undertake this training.

A key role for the LGD is, in partnership with the Cabinet Office, to create and update a CRIP for discussion at COBR. The FSA will be responsible for producing Incident SIT REPs which Cabinet Office will use to formulate its CRIPs. The **Incident Situation Reports SOP** contains the template showing the required format for the SITREPs.

Once the FSA is involved in a central Government led response there are a number of co-ordination groups and functions which may require FSA participation. The level of FSA engagement in COBR will be a subject for discussion at SIOG. A summary is given below of some of the main cross-government strategic coordination groups and functions, where FSA participation may be required.

**Scientific Advisory Group for Emergencies** – Chaired by the Government Chief Scientist and/or the Chief Medical Officer. SAGE can be activated by COBR in the event of an emergency or significant disruptive challenge. It is responsible for co-ordination of scientific and technical advice in order to inform decision making during an emergency response. It also provides a peer review mechanism.

The decision to activate SAGE sits with the LGD or the Government Chief Scientist. Where food is implicated, the FSA will be represented at SAGE normally by the FSA Chief Scientific Advisor or a nominated deputy. SAGE science guidance for an emergency impacting on food and/or feed is available and held by GO Science.

The **Scientific and Technical Advisory Cells** provide advice to local responders to deal with the local consequences of an incident and manage local recovery efforts. Where food and/or feed safety is a potential issue, the FSA will attend STAC meetings. The FSA
Food Standards Agency – Non-Routine Incident Management Plan attendee would normally be a senior expert from the ‘lead’ division. The Department for Levelling-up, Housing and Communities (DLUHC) Resilience and Emergencies Division (RED) will provide the FSA with dial in details for STAC meetings in the event of a local response to an emergency.

**News Co-ordination Centre** – the central NCC can be set up at during a level 1 (or above) Emergency. The NCC role is to advise the LGD on media handling. The NCC also compiles and maintains briefing lines and messages for distribution to Ministers and others and provides briefing to COBR. The decision to activate an NCC will be taken by the Cabinet Office in consultation with the LGD and the Prime Minister's Office.

Other groups, functions and roles that may be relevant to the FSA during a Central Co-ordinated Government Response are described in the Central Government CONOPs.

**Liaison between COBR and the devolved administrations**

The **Central Government Concept of Operations** document describes in detail the mechanism of COBR interaction with Devolved Administrations. The level of engagement depends on the nature of the incident and where the incident occurs. There is scope for Devolved Ministers to attend COBR in person where the incident affects their territories, with officials from the Devolved Administrations invited to attend COBR Officials meetings.

In general, for non-terrorist emergencies the Devolved Administrations have lead responsibility for managing the consequences of a non-terrorist emergency as far as it affects their territory using their own corporate response arrangements. Guidance on emergency preparedness arrangements across the Devolved Administrations are set out on the [Cabinet Office Emergency Preparedness website](#).

**Scotland**

When the scale or complexity of an incident is such that some degree of central government co-ordination or support becomes necessary, Scottish Government will activate its emergency response arrangements through the SG Resilience Room (SGoRR). In the event of a major food incident, Senior FSS representatives would be expected to attend SGoRR.
SGoRR is also responsible for liaising and working in partnership with the UK Government and the Cabinet Office Briefing Room (COBR).

The Food Standards Scotland Incident Management Framework provides more detail on the Scottish response to a Major Incident.

Wales

In Wales, the Emergency Co-ordination Centre Wales (ECCW) engages with COBR and is set up by Welsh Government with the FSA in Wales providing input, depending on the nature of the emergency.

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

Northern Ireland

In Northern Ireland, the Crisis Management Group (CMG) is a Ministerial led strategic co-ordination group responsible for setting the overall strategy for the NI Administration’s response to a level 2 or level 3 emergency as defined by Cabinet Office.

The Civil Contingencies Group NI (CCGNI) is the public service strategic emergency planning policy review and development group. The CCGNI in its role in emergency preparedness supports the CMG and co-ordinates strategy when Ministerial involvement is not required. FSA in NI is represented on the CCGNI, and the Food and Feed Incident Management Group (FFIMG) is a subgroup of CCGNI.