

Incident Management Framework

Version 2.0

August 2022

Version Control

The Resilience Manager within the Enforcement Delivery branch at Food Standards Scotland (FSS) is responsible for maintaining this Incident Management Framework (IMF) which will be reviewed on an annual basis. Any queries/feedback relating to this document should be emailed to: resilience@fss.scot

| Version | Date | Last review carried out | Next review due | Comments |
|---------|-------------|-------------------------|-----------------|--|
| 1.0 | August 2018 | N/A | August 2019 | First Version |
| 2.0 | August 2022 | August 2018 | August 2023 | Lessons learned from COVID-19 response |

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Foreword

As outlined in the Food Standards Scotland (FSS)'s <u>Strategy for 2021 – 2026</u>, our mission is to be Scotland's leading authority on food safety, standards and healthy eating; using data and evidence to provide assurance and advice that inspires consumer confidence and improves public health.

Our statutory objectives are defined in the Food (Scotland) Act 2015 and as Chief Executive of Food Standards Scotland, it is my responsibility to ensure that FSS acts to protect the public from risks to health which may arise in connection with the consumption of food. Therefore, it is vital that FSS responds in a collaborative and timely manner during food or feed incidents which may have an impact on consumers. It is our role to work closely with Local Authorities, Public Health Scotland and other health professionals, Scottish Government, Industry, Retailers and Trade Associations to minimize quickly the risk to consumers in the event of a food incident.

However, the food supply chain is a global one and FSS works closely with colleagues at the Food Standards Agency to manage incidents across the UK and internationally. A Memorandum of Understanding is in place between Food Standards Scotland and the Food Standards Agency to ensure liaison arrangements continue to deliver a coordinated incident handling response based on aligned principles.

Investigating and managing incidents to ensure that consumers are protected has been, and will continue to be, a crucial aspect of all our work. Protection of public health will always be a top priority and maintaining confidence in the food supply system is integral to that. We accept that meeting those objectives can cause tension with businesses involved in incidents. While we are committed to working and supporting businesses involved in incidents our approach is, and always will be, determined by levels of uncertainty: the more uncertainty there is, the more precautionary we are likely to be to protect public health. However, businesses should be assured that our response will also be proportionate and determined by the evidence we have.

This FSS Incident Management Framework (IMF) has been developed in recognition of the size and structure of our organisation and will be reviewed regularly to ensure the document continues to be fit for purpose.

Geoff Ogle

Chief Executive

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Food Standards Scotland

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Abbreviations

APHA Animal and Plant Health Agency

BAU Business As Usual

BIMF Business Incident Management Framework

CPHM Consultant in Public Health Medicine

COBR Cabinet Office Briefing Rooms **DGG** Directorate Governance Group ELT Executive Leadership Team **FBO** Food Business Operator **FSA** Food Standards Agency **FSS** Food Standards Scotland IAT Incident Assessment Team **ICM** Incident Classification Matrix **ICP** Incident Communications Plan **IMA** Incident Management Approach IMF Incident Management Framework

IMP Incident Management Plan

IMT Incident Management Team (external)

LA Local Authority

OGD Other Government Department
OIT Operational Incident Team
PHS Public Health Scotland

PRIN Product Recall Information Notice

RASFF Rapid Alert System for Food and Feed RIMP Routine Incident Management Plan

RMDMM Risk Management Decision Making Model
SEPA Scottish Environmental Protection Agency
SFCIU Scottish Food Crime and Incidents Unit
SGLD Scottish Government Legal Department
SGORR Scottish Government Resilience Room
SHPN Scottish Health Protection Network

SIT Strategic Incident Team

SITREP Situation Report

SOP Standard Operating Procedure

TNA Training Needs Analysis

SRA Scientific Risk Assessment

UKHSA United Kingdom Health Security

WRA Wider Risk Assessment

1. Introduction

1.1 Purpose

This document outlines Food Standards Scotland (FSS)'s principles, processes and structures to be established when leading in the management of a Level 2 or above food or feed incident. In the event of a Level 1 incident, the FSS Incidents team will follow routine incident management processes.

Other documents and Standard Operating Procedures (SOP) and routine incident management processes exist which also contribute to incident management.

Together, these will provide the structure and guidance for the organisation to respond effectively and appropriately to any incidents or issues that have the potential to significantly impact public health, undermine confidence in the food supply system; impact adversely on FSS's reputation or ability to operate.

The IMF sits alongside the Business Incident management Framework (BIMF) which is in place for responding to non-food/feed business incidents which FSS needs to respond to, such as business continuity or reputational incidents. Both frameworks are underpinned by FSS's overarching Incident Management Approach (IMA)¹ to ensure the consistent and effective management of both business related and food/feed incidents.

The components of FSS's incident management documentation and related components are as follows in figure 1. It should be noted that separate arrangements² are in place for the multi-agency investigation and control of public health incidents in Scotland, which includes outbreaks of foodborne illness. In such cases, FSS is a member of the multi-agency Incident Management Team (IMT) established to investigate the outbreak. As shown below in figure 1, FSS's Approach and framework complement other industry specific plans and guidance.

(iii)

¹Incident Management Framework | Food Standards Scotland

²https://www.hps.scot.nhs.uk/web-resources-container/management-of-public-health-incidents-guidance-on-the-roles-and-responsibilities-of-nhs-led-incident-management-teams/

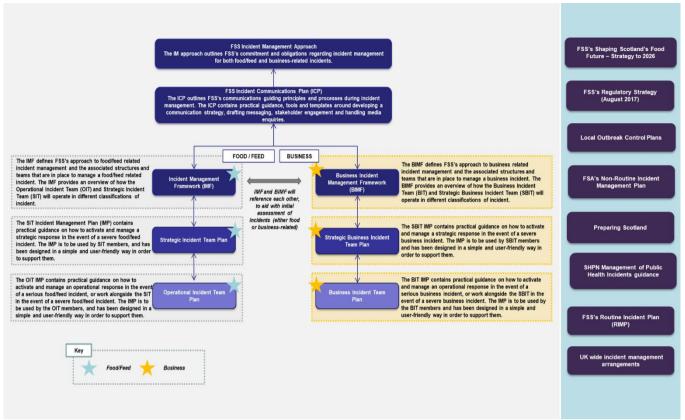


Figure 1: FSS incident management documentation & supporting documentation

1.2 Scope of response

Food/Feed incidents have the potential to impact on any individual nation within the UK or any combination of two or more. A Memorandum of Understanding³ is in place with the Food Standards Agency (FSA) to ensure liaison arrangements deliver a coordinated incident response across the UK. For the purposes of FSS or FSA-led Incident Management, only two jurisdictions are defined:

- FSS Scotland
- FSA England, Wales and Northern Ireland

The scope of an individual incident will be considered as FSA. FSS or UK-wide. Where the scope of an incident does not extend beyond either England, Wales or Northern Ireland, the incident will be managed by FSA, and information about such incidents shared with FSS. Where the scope of the incident does not extend beyond Scotland. the incident will be managed by FSS, and information about such incidents shared with FSA.

If an incident originates in Scotland or is initially led by FSS, and escalates to a UKwide incident, FSS will continue to lead the incident by mutual agreement, unless it is agreed that it is more appropriate for FSA to lead. The FSA's Incident Management plan defines how incidents led by FSA will be managed. 4There are also specific

³https://www.foodstandards.gov.scot/publications-and-research/publications/corporategovernance

⁴http://www.food.gov.uk/business-industry/food-incidents

arrangements in place outlining FSS's involvement in incidents led by other agencies (ie .FSA, Public Health Scotland etc)

1.3 Governance

1.3.1 Accountability

Ultimate accountability for incident management at FSS sits with the Chief Executive. All Heads of Divisions have a responsibility to ensure the Incident Management Framework and Incident Management Plans are followed and adhered to by their staff.

The FSS Board is responsible for the strategic direction of the organisation and for supporting the Executive Leadership Team (ELT) in its leadership function. An overview of the role of the Board in incident management can be found in Annex B.

1.3.2 Ownership

Changes and updates to the IMF/Incident Management Plans (IMPs) will be conducted by the Resilience Manager, who is also responsible for coordinating a regular training and emergency exercising programme. Any changes to the IMF must be passed to the Directorate Governance Group (DGG) and approved by the ELT at their monthly meetings.

1.3.3 Responsibility

Local Authority (LA) Environmental Health Professionals have responsibility for enforcing legal food safety and standards requirements and verifying compliance with the appropriate regulations in the majority of food businesses across Scotland. From 1 April 2021, Food Standards Scotland is responsible for carrying out official controls and enforcement of feed law in Scotland as stated in The Feed (Transfer of Functions) (Miscellaneous Amendments) (Scotland) Regulations 2020. This piece of legislation provides FSS the power to delegate functions to a qualifying third party therefore in some areas of Scotland, FSS is delegating feed official control delivery to local authorities on its behalf. Food establishments which require additional veterinary supervision (i.e. abattoirs, cutting plants, and game handling establishments) are approved and subject to enforcement by FSS. The Food Safety Act 1990 and Regulation (EC) 178/2002 provide the framework of food law applicable in Scotland commonly used by LA Environmental Health Professionals and FSS.

1.3.4 Delivery

FSS has issued a Code of Practice⁵ on behalf of Scottish Ministers which provides directions and clear guidance to LAs on the execution and enforcement of Food Law, including the investigation of incidents and outbreaks of food borne illness. Food Standards Scotland is responsible for carrying out official controls (this includes

⁵https://www.foodstandards.gov.scot/publications-and-research/publications/food-law-code-of-practice-scotland-2019



sampling and inspections) and enforcement of feed law. The Official control delivery section of the FSS website outlines the OC procedures for Feed Delivery⁶.

Food Business Operators (FBOs) are required to inform the LA (or FSS in the case of an FSS enforced establishment) immediately when they have reason to believe that food which it has imported, produced, processed, manufactured or distributed does not comply with food safety requirements, and/or when it may be injurious to human health. Competent authorities should also be notified in the event of a breach of food information law and there are similar requirements in the legislation which apply to feed. This can be done by completing the incident report form found on the FSS website⁷.

1.4 Definitions

The following definitions are used by FSS:

<u>Food/Feed Incident</u>: any event where, based on the information available, there are concerns about actual or suspected threats to the safety, quality or integrity of food/feed or fraud that could require intervention to protect consumers' interests.

FSS's existing definition

1.5 Objectives

The overarching principle guiding FSS's incident management response is the protection of public health with respect to food and feed intended to be placed on the market.

The objectives of incident management at FSS are to:

- Successfully identify and manage food or feed incidents
- Provide informative advice to consumers during a food or feed incident
- Act as the coordinating body and work closely with key stakeholders when leading food or feed incidents

⁷https://www.foodstandards.gov.scot/business-and-industry/scottish-food-crime-and-incidents-unit/food-incidents/reporting-a-food-incident-guidance



⁶Official control delivery and enforcement of feed | Food Standards Scotland

1.6 Guiding principles

The overarching purpose of incident management at FSS is public health and consumer protection. To ensure FSS responds in line with the objectives outlined in Section 1.5, the following principles will guide all incident management response activities and is applicable to each and every level of the response.

Consumer Focused

eople

Public health and consumer protection in relation to food safety, standards & authenticity will be at the forefront of every response. All decisions will revolve around their safety, and response teams will remain empathetic throughout the incident and commit to providing the necessary welfare to those affected.

Plans and procedures

Preparedness

FSS shall have effective plans and procedures in place to guide them in the event of food/feed incidents affecting Scotland, or reputational incidents affecting the organisation. These plans shall be reviewed on a regular basis to ensure they remain fit for purpose.

Professionally trained and competent staff

For all those who may be involved in managing an incident, FSS will ensure that staff are sufficiently trained and competent to undertake the role they have been given. Appropriate training will take place on a regular basis.

Precautionary principle

At FSS, the precautionary principle should guide all elements of incident management, including the decision to activate the incident response teams. Levels of precaution will be determined by the degree of uncertainty but be proportionate. It is better to over-react, then stand-down resources as more information becomes available, rather than delay mobilisation and the tactical/strategic response.

Transparency

spons

As far as it is possible, without releasing confidential information, FSS's incident management response will be driven by transparency and openness to ensure effective and proactive communication flows with all stakeholders are in place.

Speed of response

All aspects of the incident response (i.e. decision-making, communication and information flow) should be conducted in a timely manner. Our decisions and actions should support compliant businesses and be effective at dealing with non-compliant ones. Incident response teams may be required to make difficult decisions, often on the basis of partial or incomplete information. While a speedy response is vital, it is crucial that decision-making is evidence-based, transparent and recorded.

Regulation and policy

In line with FSS's Strategy⁸, FSS will ensure all legal obligations are considered and there is consistent and proportionate application of the law when making risk management decisions.

Considering our stakeholders

At FSS, stakeholders should be factored into the strategic decision-making process required to manage an incident at all times. Consideration must also be given to how these decisions will impact stakeholders critical to FSS's success (including, although not limited to, the general public, employees, Scottish Government, HPS, LAs, media etc.).

Proactive communication

Where possible, FSS will take a proactive approach to incident management, ensuring that the organisation is seen by key stakeholders as the authoritative source of information in relation to the situation.

⁸ Our strategy: 2021 to 2026 | Food Standards Scotland V2.0



2. Structure, roles and responsibilities

FSS manages many food incidents every year. FSS operates a two tier incident management structure, as shown in Figure 2 below. In many cases, the Incidents Team will respond to incidents using their Level 1 routine procedures. However, if a more coordinated operational response is required, an Operational Incident Team (OIT) may be invoked. In the event strategic direction is required to coordinate and manage the situation, a Strategic Incident Team (SIT) may be formed. The Food Incidents section of the Food Law Code of Practice⁹ outlines the roles of LAs during incident management. The FSS Feed Manual outlines the role of FSS as competent authority for feed incidents.

2.1 Response structure

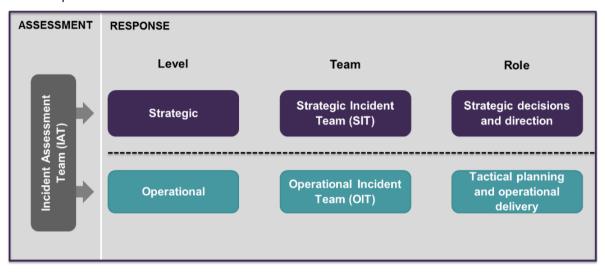


Figure 2: Food Incident Management structure

2.2 Team descriptions

IAT: The role of the Incident Assessment Team (IAT) is to consider the potential implications of a situation, including threat to public safety, FSS's operations and reputation. The IAT then agrees on the classification of the incident if required, and follows the processes in place to activate the OIT as needed.

OIT: The role of the OIT in the initial stage of the incident will be to support and manage the operational and tactical response to the incident, including incident management, information gathering, tactical planning, internal and external communications, and stakeholder engagement.

⁹https://www.foodstandards.gov.scot/publications-and-research/publications/food-law-code-of-practice-scotland-2019



SIT

SIT: The SIT primarily consists of FSS Senior Managers from the ELT and DGG and, where necessary, representatives from central and local Government groups and strategic industry stakeholders. The SIT provides high-level strategic leadership and direction to the OIT, evaluating future risks and ensuring appropriate actions are taken.

The SIT supports the OIT in managing its response including strategic communications, reputation management, senior stakeholder engagement, keeping Ministers informed, preparing for any legal implications, leading the recovery, and horizon scanning to identify any upcoming or potential risks. The SIT is also responsible for liaising with and briefing the FSS Board on incidents.

2.3 Incident Assessment Team (IAT)

The IAT may be activated in the event that it is unclear what level an incident is (following completion of the Classification Matrix) and when further information, discussion and clarification is required. The role of the IAT is to:

- Form as required to identify the situation and consider the potential implications, including threat to public safety, FSS' operations and reputation.
- Agree on the classification of the incident using the matrix, as necessary.
- Consider the activation the OIT, as required and liaise with Facilitator as appropriate.
- If you decide not to activate a formal response, **document the rationale** supporting the IAT's decision.

2.3.1 Membership of the IAT

The IAT comprises core team members, additional team members and optional external support, as shown in Figure 3 below. The IAT is usually chaired by the Incident Manager, who may instead nominate a senior experienced member of the Incident teams to chair in his/her/their place.

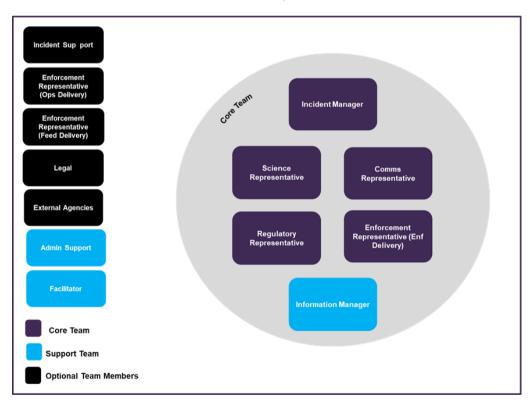


Figure 3: IAT membership

2.4 Operational Incident Team (OIT)

Once the Incident Manager or IAT decide an OIT is required due to the incident classification (Level 2 or above), the Facilitator is then responsible for mobilising the OIT. During a Level 2 incident, where the OIT is the most senior incident team to be established, the OIT's responsibilities are to:

- Coordinate the **tactical and operational** response to the incident.
- Hold an initial meeting to understand the situation, set team objectives and identify the salient issues.
- Formulate a plan of how to manage the incident.
- **Inform** the DGG and the ELT that the OIT has been mobilised and provide the rationale.
- **Set the 'battle rhythm'** (page 43) for the response and communicate this to the team (i.e. when meetings will take place and when updates are expected).
- Carry out operational tasks to manage the incident i.e. traceability mapping, development of food sampling plans in conjunction with LAs, liaising with FBOs and retailers as appropriate.
- Identify and engage with stakeholders, including the use of 'Birdtable' briefings for stakeholders.
- Consider the communication response required.
- Ensure that information is captured and managed using CLIO by liaising with the Information Manager/Facilitator.
- **Ensure that high quality updates** and briefings are provided to the ELT and DGG throughout the response via SFCIU Daily Management meeting documentation.
- Sign off communication lines/press releases as per the ICP
- Continue to assess the incident throughout the response to determine:
 - If the incident classification remains the same (or whether escalation/deescalation is required).
 - Whether FSS should remain the lead organisation.
- Decide when to stand down the response and communicate to the team and wider business, as appropriate.

Additionally, in the event of a Level 3 or 4 incident (where a SIT is established to manage strategic considerations), the OIT should also:

- Ensure the OIT Chair attends SIT meetings in the role of Incident Director to act as the link between the OIT and SIT teams.
- Complete the actions as directed by the SIT.
- Identify appropriate people to attend externally led incident meetings, if required i.e. Public Health Scotland (PHS), FSA, Animal and Plant Health Agency (APHA).

STRUCTURE & ROLES

2.4.1 Membership of the OIT

The OIT comprises of core team members, optional team members, as shown in Figure 4 below. For each OIT role a primary, secondary and reserve staff member has been identified and these are listed in the FSS Critical response role Master document. When the primary staff member is not available, the secondary staff member should be contacted and so on. It is important to note the roles listed below are roles to be adopted during an incident, and should not be confused with Business as Usual (BAU) job titles.

It is expected that the Head of Scottish Food Crime and Incidents Unit (SFCIU) will assume the role of OIT Chair and the Incident Director at the SIT. Each Manager attending the OIT may also decide to invite a deputy manager from their branch to support operational discussions.

In the event of a multi-agency response, or if specialist expertise is required to advise the team, the OIT is able to invite Subject Matter Experts (SMEs) from external agencies into the OIT as additional resource.

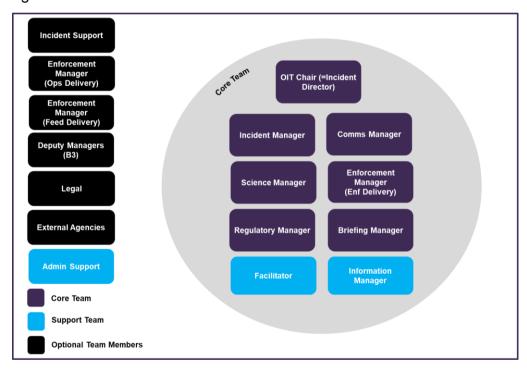


Figure 4: OIT Membership

2.4.2 OIT Members Roles and Responsibilities

A brief overview of the responsibilities of OIT members can be found below. Full role cards and a list of nominated personnel who could assume these roles can be found in the OIT IMP. Support team roles can be found in **section 2.6**.

| OIT Chair (= Incident Director) | At a OIT meeting, the OIT Chair is responsible for leading the team and chairing OIT meetings. The Chair sets the overall operational objectives for the OIT. The role should be assumed by a senior figure who has the authority to approve decisions, actions and messaging. The OIT Chair has ultimate responsibility for decision making in the OIT. The OIT Chair attends SIT meetings in the role of Incident Director, to act as the link between the OIT and SIT teams. |
|---|---|
| Incident Manager | The Incident Manager is responsible for the operational management of the incident and for the implementation of relevant incident decisions taken by the OIT, and for the delivery of the incident investigation. This role should be fulfilled by the Head of Incidents or an experienced member of SFCIU. |
| Enforcement Manager (Enforcement Delivery) | The Enforcement Manager (Enforcement Delivery) is responsible for recommending appropriate Risk Management options on which the OIT can act. This role should be fulfilled by a senior manager from the Enforcement Delivery branch during all incidents. |
| Enforcement Manager (Operational Delivery) | The Enforcement Manager (Operations Delivery) is responsible for recommending appropriate Risk Management options on which the OIT can act. This role is only required during an incident involving an FSS approved establishment, or where specialist Veterinary advice is required by the OIT. This role should be fulfilled by a senior representative from the Operational Delivery branch (i.e. Head Veterinarian or Field Veterinary Advisor), as required. |
| Enforcement Manager (Feed Delivery) | The Enforcement Manager (Feed Delivery) is responsible for recommending appropriate Risk Management options on which the OIT can act. This role is only required during an incident involving animal feed. This role should be fulfilled by a senior manager of Feed Delivery team |

| Science Manager | The Science Manager is responsible for identifying the relevant scientific evidence required to produce the Scientific Risk Assessment (SRA). This role is responsible for developing the SRA which establishes the potential risk of a food/feed incident to human health. This is considered by the Incident Manager (or the IAT, if mobilised) when carrying out the incident classification, and by the OIT to determine the most suitable risk management options. This role will be fulfilled by a Scientist from the Risk Assessment team within the Science Division (SD) or a suitably qualified Scientist from an external organisation ie. Radiological risk assessment (as required). |
|-----------------------|--|
| Comms Manager | The Communications Manager is responsible for overseeing all aspects of FSS's communication response, including the development of messaging, communication materials and coordinating the stakeholder engagement matrix. This role should be fulfilled by a senior manager of the communications team. |
| Regulatory Manager | The Regulatory Manager is responsible for representing the Regulatory Policy division on the OIT and inputting into the operational risk management from a policy perspective by providing information on legislative requirements/breaches. This role should be fulfilled by a senior manager of the Regulatory Policy division. |
| Briefing Manager | The Briefing Manager is responsible for providing briefings for ministers and stakeholders as required, and establishing Birdtable meetings. This role should be fulfilled by Head of Private Office (or nominated deputy). |
| Deputy Managers | The OIT managers may decide to invite an additional colleague with some to facilitate detailed discussions at the OIT. The Deputy Managers (B3) are responsible for providing operational and technical expertise and support to the OIT Managers throughout the response, as required. |
| Incident Support | Incident Support is responsible for investigating the incident, acting as the main point of contact within the Incidents Team and supporting the Incident Manager in any way required. This role must be fulfilled by a member of SFCIU trained in Incident Management. |

| Legal | The Legal representative is responsible for providing any necessary legal advice to the OIT in relation the incident or the impacts of any decisions made by the OIT. |
|--------------------|--|
| | This role will be fulfilled by a representative from the Scottish Government Legal Department (SGLD). The SGLD representative's role is to provide legal advice to FSS during the incident management response. |
| External Agency | External Agency representatives are responsible for providing any intelligence, information or expertise required to the OIT. Their attendance at an OIT also aims to facilitate effective liaison and management of a multi-agency incident. |
| | These roles will be fulfilled by members of relevant agencies as required (e.g. FSA, PHS, Local Food Authorities, APHA, PR agency etc.) |

2.5 Strategic Incident Team (SIT)

The SIT is mobilised by the Facilitator during an incident which is classed as a Level 3 or above. The SIT's responsibilities are to:

- Provide **leadership and direction** in the effective and timely response and management of a Level 3 or 4 incident.
- Identify **strategic issues** (i.e. reputation, political, industry etc.) and establish any key areas where further information is needed.
- Conduct scenario planning in order to establish any worst case options and possible remediation.
- Develop response strategy based on issues identified.
- Develop and agree communication strategy and sign off key messages and communications materials.
- Provide strategic direction to the OIT.
- Identify strategic stakeholders and develop stakeholder engagement strategy.
- Review briefing materials i.e. ministerial briefings.
- Ensure the OIT is performing and sufficiently resourced to respond effectively.
- Consider impacts of incident on BAU activity and take decision about how this will be managed.
- Decide when to **stand down** the response and communicate to the team and wider business.

2.5.1 Membership of the SIT

The SIT comprises of core team members, additional team members and optional external support, as shown in figure 5 below. Each SIT role has an identified primary and secondary member as outlined in the FSS Critical Response Role Master V2.0

Document. It is important to note the roles listed below are incident roles, and should not be confused with BAU job titles.

The Chief Executive Officer (CEO) will not be responsible for chairing the SIT meetings in order to allow for his/her/their focus to remain on stakeholder engagement if required. If not acting as SIT Chair, the second deputy chief executive will remain available to lead business as usual activities.

In the event that specialist expertise is required to advise the team, the SIT is able to invite experts into the SIT as additional resource.

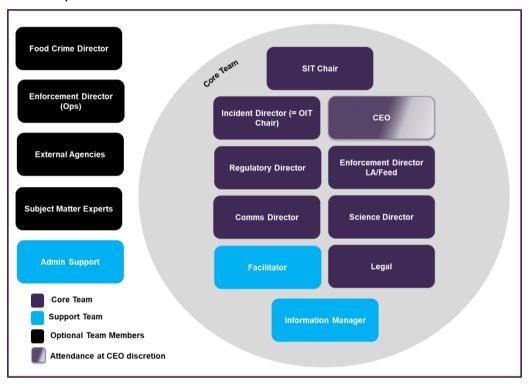


Figure 5: SIT membership

2.5.2 SIT Members Roles and Responsibilities

A brief overview of the responsibilities of SIT members is below. Full role cards can be found in the SIT IMP. Support team roles can be found in section 2.6.

The SIT Chair leads the SIT and chairs the meetings. The Chair sets the overall strategy and objectives for the SIT. The role should be assumed by a senior figure within the business who has the authority to approve strategy, actions and messaging. They should have extensive leadership experience and remain calm under pressure. In the CEO's absence, the SIT chair is responsible for briefing the chair/vice-chair of the FSS Board after each meeting.

This role will ordinarily be assumed by. Deputy Chief Executive & Director of Policy, Science and Operations.

| Incident Director (=OIT Chair) | The Incident Director is responsible for the overall tactical and operational management of the incident during a level 3 or 4 incident. During a level 3 or 4 incident, they will request a SIT is convened. The Incident Director will also chair the OIT and act as the liaison between the SIT and OIT. This role should be assumed by the Head of SFCIU. |
|--|--|
| CEO | If in attendance, the CEO is responsible for briefing strategic stakeholders, acting as the organisation's spokesperson (if appropriate) and leading the organisation as a whole. The CEO is responsible for briefing the chair/vice-chair of the FSS Board |
| Enforcement Director | The Enforcement Director (LA/Feed Delivery) is responsible for representing the LA Delivery team on the SIT. |
| (LA/Feed Delivery) | This role is also required during an incident involving animal feed. This role should be fulfilled by the Head of LA Delivery, as required. |
| Enforcement Director (Operational Delivery) | The Enforcement Director (Operational Delivery) is responsible for representing the Operational Delivery branch on the SIT. This role is only required during an incident involving an FSS-approved establishment, or where specialist Veterinary advice is required by the SIT. This role should be fulfilled by the Head of the Operational Delivery branch, as required. |
| Science Director | The Science Director is responsible for representing Science Division on the SIT and advising on the scientific risk assessment. This role will be fulfilled by the Head of the Science Division. |
| Comms Director | The Communications Director is responsible for representing the Communications team on the SIT and for developing the communications strategy in Level 3 & 4 incidents. This role will be fulfilled by the Head of Communications (or nominated deputy). |
| Regulatory Director | The Regulatory Director is responsible for representing the Regulatory Policy division on the SIT. This role will be fulfilled by the Head of the Regulatory Policy (or nominated deputy). |
| Food Crime Director | The Food Crime Director is responsible for representing the SFCIU on the SIT. This role is only necessary if the SFCIU Director is not the Incident Director (i.e. In the event of a parallel criminal investigation etc.). This role will be fulfilled by the Head of SFCIU (or nominated deputy). |

| Legal | The Legal representative is responsible for providing any necessary legal advice to the SIT in relation to the incident or the impacts of any decisions made by the SIT. |
|------------------------------|---|
| | This role will be fulfilled by a representative from the SGLD. The SGLD Representative's role is to provide legal advice to FSS during the incident management response. |
| External Agency | External Agency representatives are responsible for providing any intelligence, information or expertise required to the SIT. |
| | These roles will be fulfilled by members of relevant agencies as required (e.g. FSA, PHS, APHA, Local Food Authorities & PR Agency etc.) |
| Subject Matter Experts | Subject Matter Experts can attend SIT meetings as required to provide specialist advice. |
| | These roles can be fulfilled by internal or external subject matter experts as required (e.g. FSS's Chief Scientific Advisor). |

2.6 Support team roles

The roles below are present in both the OIT and SIT, and are critical to the success and smooth running of the operation.

| | The Facilitator is the guardian of the incident management process, and acts as the 'right-hand' to the OIT and SIT chairs to ensure the functional running of both meetings. |
|-------------|--|
| Facilitator | The Facilitator supports the OIT and SIT meeting chairs as required and ensures all information is captured (i.e. decisions are recorded and actions are logged by the Information Manager). The Facilitator will ensure the team has the correct representation, as requested by the chair. The Facilitator will also make sure the information management process is being followed to support with effective decision-making. |
| | The Facilitator also maintains the Information Board & Objectives Board in both the OIT and SIT. |
| | This role may be assumed by a senior member of the team, who has received training in the role. |

| Information Manager | The Information Manager maintains the Issues & Actions Log and Decision Log for the OIT and SIT. The Information Manager is responsible for recording the issues raised by the incident and assigning the corresponding actions with clear owners and deadlines. The Information Manager also records decisions made by the OIT/SIT alongside the rationale supporting those decisions. This role should be assumed by a trained member of staff. |
|------------------------|--|
| Admin Support | The Admin Support role is responsible for conducting any additional administrative tasks on behalf of the OIT/SIT to ensure the meetings run smoothly. This role should be assumed by a trained member of staff. |

2.7 Branch involvement

The branch teams will provide appropriate resource, support and advice to the incident response teams, as required. Incident Management is a fundamental priority for FSS and should be prioritised over non-urgent business as usual work.

The Scottish Food Crime and Incidents Unit (SFCIU) is the incidents, investigations and intelligence gathering arm of FSS. It focuses on tackling food crime and maintaining consumer protection. The Unit comprises of:

- a dedicated **Incidents team**, which ensures that FSS acts in a timely manner during incidents which may have an impact on consumers
- a dedicated Food Crime Intelligence Bureau, which analyses, develops and deals with information intelligence received from members of the public, food business operators and industry whistle-blowers
- an Investigations Team which investigates reports of food crime and non-compliance

SFCIU's responsibilities include working closely with a range of stakeholders including LAs, Public Health professionals, Scottish Government, Industry, FBOs and Trade Associations to quickly minimise the risk to consumers in the event of a food incident.

During an incident, members of SFCIU will fulfil the Incident Manager, Incident Support, OIT chair/Incident Director roles where possible. SFCIU is responsible for supporting the incident response as necessary.

Science Division (Risk Assessment)

The Science Division - Risk Assessment team is responsible for developing strategies for reducing foodborne illness in Scotland; generating and evaluating evidence to support FSS's remit relating to food safety and consumer protection, and; ensuring FSS policy and operational functions are underpinned by robust scientific evidence.

During an incident, members of Science Division will fulfil the roles of Science Manager/Director. The Science Division - Risk Assessment team is responsible for providing the Scientific Risk Assessment (SRA) during incidents. Where additional input is required to complete the SRA, the Science Division — Risk Assessment team will act as the main scientific point of contact with any subject matter experts (i.e. Chief Scientific Advisor etc.) in order to obtain the necessary information to complete the SRA.

Regulatory Policy

The Regulatory Policy division is responsible for: developing Scottish legislation and influencing emerging updates to retained EU law to provide a legislative risk management framework to protect Scottish consumers interests with respect to the safety and authenticity of food and feed; providing regulatory policy advice to Scottish Ministers, internal and external stakeholders on the requirements of EU and Domestic Food and Feed law, and; internal engagement within FSS supporting the other branches as required.

During an incident, senior members of the Regulatory Policy division will fulfil the roles of Regulatory Manager/Director depending on the nature of the incident. It is also responsible for providing appropriate regulatory policy advice to determine effective and appropriate risk management options to the OIT and SIT.

Operational Delivery

The Operations Delivery branch is responsible for approving and enforcing slaughterhouses, cutting plants and game handling establishments, as those facilities require the presence of an Official Veterinarian. Operations Delivery also approves plants with on-site cold stores, minced meat, meat preparation or meat products establishment. However, if they're stand-alone establishments, LAs will assess them.

During an incident involving an approved establishment where FSS is the enforcing authority, Operational Delivery is responsible for assuming the role of the Enforcement Manager/Director in the OIT/SIT.

Operational Delivery will lead veterinary risk assessments and it is also responsible for liaising with the relevant external agencies (e.g. APHA, VMD) in order to acquire a SRA when Veterinary information is required.

Operational Delivery is also responsible for providing appropriate Risk Management options when an FSS-enforced establishment is involved. Operational Delivery will also liaise with relevant partner agencies, such as APHA, to obtain any necessary scientific assessments.

\ Deliver

The LA Delivery division is responsible for: ensuring effective delivery of official controls relating to food safety, feed safety and food standards by working with local authorities and delivery bodies; developing an enforcement framework for Scotland to ensure delivery of policy relating to food safety, feed safety, food standards, authenticity and labelling, and; leading projects specific to delivery of local authority functions.

During an incident, LA Delivery is responsible for providing appropriate expertise and advice to the OIT and SIT in determining effective risk management options in the context of existing food and feed regulation.

mmunication

The Communications team is responsible for: developing and delivering all internal and external communications for FSS and for managing FSS's reputation.

During an incident, members of the Communications Team are responsible for fulfilling the roles of Communications Manager/Director in the OIT and SIT. These roles will produce proactive and reactive communication material relating to the incident to inform the public and consumers, while assessing the communication and potential reputational risk for FSS.

3. Escalation and mobilisation

3.1 Notification

Incident notification could originate from a range of different sources including internally by FSS Authorised Officers in the field, FSA, LAs, Emergency services, Other Government Departments (OGD), Industry, FBOs & Consumers. Incident notification may also originate from the EU Commission, as well as the International Food Safety Authorities Network (INFOSAN).

3.2 Incident classification

The incident level descriptions diagram below outlines the four potential types of incident.

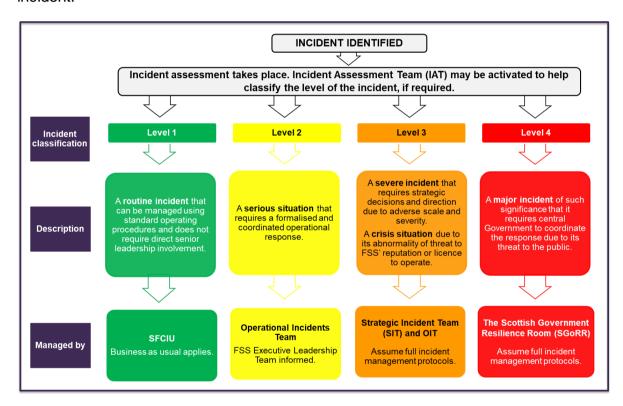


Figure 6: Incident Level descriptions

Once notified of an incident, the Incidents Team should classify the incident using the Incident Classification Matrix (ICM). This tool should be used to help assign a level to the incident and determine the most appropriate response (i.e. if an OIT is required). In the event the classification cannot be assigned due to lack of information or where clarity is required, an IAT should be established to discuss the matter further and seek advice from a multi-disciplinary team.

While considering the most appropriate incident classification, the precautionary principle should always be applied to ensure our statutory objectives to protect public health and other consumer interests from food-related risks are met.

3.3 Declaring an incident

Any member of the Incidents Team can classify an incident. However, if there is uncertainty over the level of an incident, the IAT can be formed to gain a more complete assessment of the situation from the information available. The role of the IAT Chair will be assumed by the Incident Manager who will classify the incident with the help of the IAT.

The decision to declare a Level 4 can be made only by SIT and will be based on evidence, size, scale and impact on public health, and is likely to be in response to liaison with multi-agency partners (i.e. Scottish Government, Police Scotland etc.). In the event a Level 4 is provisionally assigned by FSS not as a direct response of notification by a multi-agency partner, the SIT Chair will contact SGoRR immediately.

3.4 Escalation

The incident escalation flowchart detailed in Figure 7 below details the process for escalating an incident after notification.

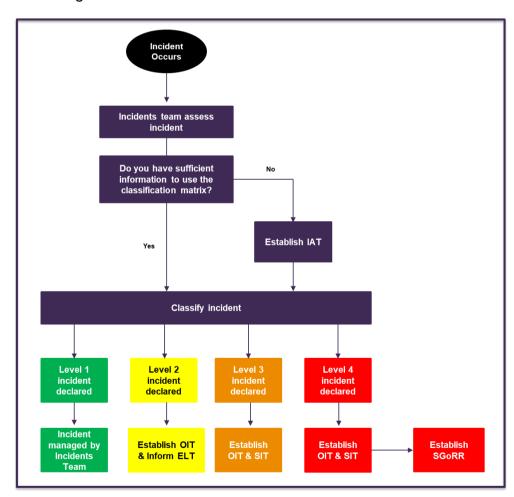


Figure 7: Incident escalation flowchart

As outlined in the sections above and depicted in this diagram, the Incidents Team should use the ICM to classify the incident or decide if an IAT is needed. Once a classification has been confirmed, the appropriate team(s) should follow the process flow outlined in sections. If the incident is classified as a **Level 1** the IAT disbands and no further action is needed. If the incident is classified as a **Level 2** or above the IAT disbands and forms an OIT (and SIT if required).

4. Risk Analysis

4.1 Risk Analysis Process

The Risk Analysis process is central to FSS's incident management process. Its effective application helps prevent, mitigate and manage food and feed incidents in Scotland.

In line with Retained Regulation (EC) 178/2002¹⁰, Risk Analysis at FSS consists of a three stage process:

- Risk assessment: The risk assessment process consists of two phases:
 - The Scientific Risk Assessment (SRA) involves scientifically assessing the risk of the hazard(s) presented by the incident. This process is undertaken by the Risk Assessment Team in FSS Science Division who may request support from FSA's risk assessment team depending on the nature of the incident.
 - As outlined in Regulation 178/2002, in some cases a SRA alone cannot provide all the information on which a risk management decision should be based and other factors should also be considered. Therefore, the Wider Risk Assessment (WRA), which involves assessing other legitimate factors like the wider political, reputational, regulatory and commercial aspects of the situation will also take place. During a Level 2 incident, this process is undertaken collectively by other members of the OIT. In a Level 3 or above incident, this is done collectively between the OIT and SIT.
- Risk management: this process involves the consideration of the control and
 prevention measures available, based on the results of the risk assessments
 and in liaison with the relevant LA. The most proportionate and appropriate risk
 management option should be decided upon by the OIT collectively. However,
 if a risk management decision cannot be made at the OIT or if strategic
 oversight is required, this should be escalated to the SIT.
- **Risk communication:** sharing of information to interested parties (such as consumers, FBOs, other responding agencies etc.) in regards to the risk management decision including the findings of the risk assessment process.

4.2 Scientific Risk Assessment

While carrying out the scientific risk assessment, FSS will operate in line with the Codex Alimentarius (Retained Regulation 178/2002) and the process will consist of the following four steps: hazard identification; hazard characterisation; exposure assessment, and risk characterisation.

The Science Division (Risk Assessment) will complete/act as the main scientific point of contact for the SRA. In an event where veterinary risk assessment is required Operational Delivery will lead in liaison with the Risk Assessment team. This process

¹⁰ http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2002:031:0001:0024:en:PDF V2.0

may be ongoing throughout the incident depending on the evidence available and the complexity of the science.

The Science Manager/Director (fulfilled by members of the Science Division) on the OIT/SIT is responsible for updating the teams on the status of the SRA during meetings.

Depending on the nature of the incident and the contaminant involved, specific scientific expertise may be required. A list of specialists is included in the OIT IMP.

4.3 Risk Management

Once the relevant risk assessments have been undertaken, the OIT should work together to decide on the most appropriate risk management decision.

The Risk Management Decision Making Model in Figure 8 below has been developed to guide the OIT through the process of gathering information, assessing the risks, considering other contextual factors and making a risk management decision. Effective risk management is the responsibility of the whole OIT. However, accountability sits with the OIT Chair.

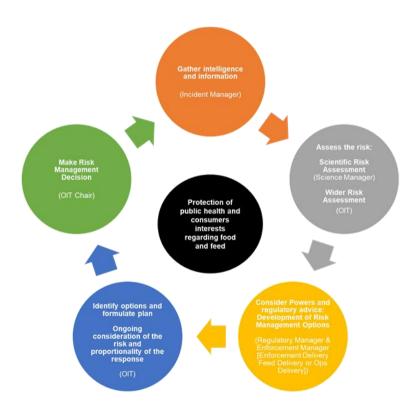


Figure 8: Risk Management Decision Making Model

1. Gather intelligence and information [Incident Manager]

The Incidents team is responsible for gathering the necessary incident information.

2. Assess the risk

- Scientific Risk Assessment [Science Manager]

Using the information gathered by the Incidents team, the Risk Assessment Team in the Science Division should complete a SRA based on the available information and specific questions asked by the Incident Manager.

- Wider Risk Assessment [OIT]

In a Level 2 incident, the remainder of the OIT should conduct the WRA to inform risk management decision making. In a Level 3 or above incident, this should be done alongside the SIT. If the risk includes the potential for food fraud, consider obtaining input from a public analyst to help determine any potential risks.

3. Development of risk management options [Enforcement Delivery, Feed Delivery, Operational Delivery & Regulatory Policy]

The Enforcement Delivery, Feed Delivery, Operational Delivery and Regulatory Policy teams are then responsible for considering the appropriate powers, policy and legislation, and providing appropriate risk management options to the OIT for consideration.

4. Identify options and formulate the risk management plan [OIT]

The OIT should then discuss Risk Management options available regarding the protection of public health and wider consumer interest in relation to food and feed. Representatives from different branches that form the OIT are responsible for helping to formulate the plan, and ensuring the risk management options available remain appropriate and proportionate.

5. Make risk management decision [OIT Chair]

The OIT Chair is then responsible for making a risk management decision based on the evidence and advice available.

4.4 Risk Communication

FSS will communicate with its stakeholders using a number of communication channels, including but not limited to:

- Email and Text Alerts
- Website statements
- Social media platforms
- Ministerial briefings
- Media releases
- Press conferences / media briefings
- Internal communications channels

The communication process is coordinated by the Communications Branch, although other members of the response may be responsible for carrying out the communication with stakeholders. Further information on this process is included in FSS's Incident Communications Plan (ICP).

5. Mode of operation

5.1 Activating teams

Once an incident has been declared, the Incident Manager should notify the Facilitator, and request they activate the appropriate teams. The Facilitator should then notify the primary (or deputy/reserve if the primary is unavailable) for all core team members, and any required optional/external attendees. They should also then book relevant rooms, if required and inform all team members of meeting times and assist the OIT/SIT chairs to establish the 'battle rhythm'.

5.2 Facilities

FSS has identified and equipped rooms in key locations to serve as incident management rooms should the need arise. Unless otherwise stated, the designated incidents room for both the OIT and SIT will be located permanently at:

Incidents Room, 3rd Floor, Pilgrim House, Old Ford Rd, Aberdeen AB11 5RL

In conjunction with the other support role functions, it is the responsibility of the Facilitator to ensure the incidents room is set up with the appropriate resource and equipment once a Level 2 or above incident has been declared.

5.3 Working Remotely

If a response is to be mobilised remotely, the following should take place:

The Facilitator should set up a 'battle rhythm' of meetings for the OIT and SIT (which will be agreed by the relevant Chair and reviewed throughout the incident). The Facilitator should set up a recurring calendar invite aligned with the agreed 'battle rhythm'. The Facilitator will provide the joining instructions either conference call dial-in or Microsoft Teams details.

The Facilitator should monitor participants' responses to each meeting and work with team members to ensure each role is represented at each meeting, and assign deputies where required.

5.4 Setting ground rules

The Facilitator will inform OIT/SIT members who are mobilised of the incident room location, time and frequency of meetings. Meetings should be scheduled with as much notice as possible and prioritised by all FSS employees, taking priority over BAU meetings. The Facilitator should also ensure all team members are aware of the meeting time and location (by MS Teams chat/SMS/phone calls if no reply is received from the calendar invitation).

The Facilitator should aim to allow 60 minutes for all meetings, and should use discretion to delay/postpone meetings if required (e.g. urgent/critical information is due/key people cannot make the meeting). The first meeting may also take longer to gather all relevant incident information.

The following meeting etiquette principles should be adhered to in all SIT/OIT meetings:

- Attendance: All required team members should prioritise OIT/SIT meetings over BAU activities and attend all meetings as required. If you are unable to attend a meeting for any reason, the Chair and Facilitator should be informed, and a deputy nominated to fulfil the role.
- Timekeeping: All team members should arrive promptly to OIT/SIT meetings.
- Respect: All team members should have the opportunity to speak without being interrupted, and be allowed to fulfil the role they have been assigned.
- **Technology:** No mobile phones or laptops should be in use during meetings unless necessary (e.g. to aid the meeting/response such as to access CLIO).
- Cooperation: All team members should ensure they help and assist the support team in the Information Management process. This means speaking clearly and the OIT Chair pausing the meeting as required to clarify decisions, issues, actions, owners and deadlines. Members are encouraged to introduce themselves clearly using their preferred gender pronouns.

5.5 Agendas

Agendas should be followed for all OIT and SIT meetings. These can be found in **sections 8.1, 8.2, 8.3** and the OIT/SIT IMPs.

5.6 Information management

The Facilitator is responsible for overseeing the information management process during a Level 2 or above incident. The Facilitator, alongside the meeting Chair, should ensure all logs/boards and the Situation Report have been completed fully, signed off and recorded on FSS's information management tool (CLIO) at the end of every meeting.

5.6.1 Information management cycle

The information management cycle below in Figure 11 details the information management process in both the OIT and SIT.

MODE OF OPERATION

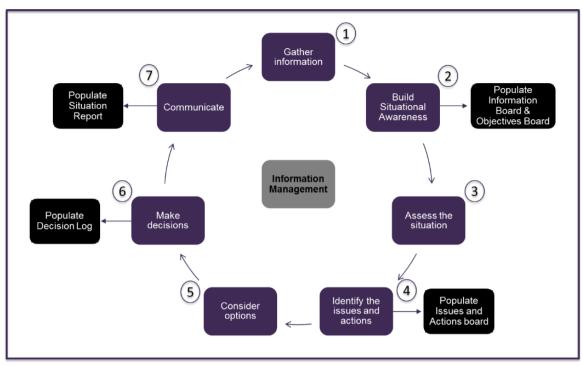


Figure 11: Information management cycle

5.7 Battle rhythm

The OIT and SIT Chairs, in liaison with the Facilitator, must establish a 'battle rhythm' that defines **when & how meetings are to be held**, and when the team will conduct updates, briefings, etc. This may follow one of the following options:

- Meeting on a pre-defined basis i.e. every 90 minutes, 09:00 daily etc., or
- At a different time and pace depending on the nature and speed of the incident

Incident responders must be provided with clarity and direction as to what they are expected to action or achieve in the time between planned meetings.

Although the battle rhythm is usually set early in an incident, it can change as the incident develops and should consider meetings held externally as part of their control and command structure.

5.8 Concept of operation

The process below is an example battle rhythm for a Level 3 incident with an externally led IMT active. This is an example of how the processes could work.

Follow standard agenda for OIT

- Formulate tactical distribute actions to

Use Situation Report template

Follow standard agenda for SIT

Follow external IMT agenda

Follow standard agenda for OIT

Follow Situation Report template

OIT Meeting 09:00 -09:45



Situation Report produced 11:00

SIT meeting 12:00 -12:45

External

Meeting 14:00 -15:30

IMT

OIT Meeting 16:00 -16:45

Situation Report produced 18:00

Example of matters discussed

- SFCIU has received further information on the affected
- team has received 9 media calls and over 3,000 mentions on

The SITREP contains

Distribution of which is limited to those managing the incident.

Example of matters discussed

- The Incident resource to support
- Impact of the

Example of matters discussed

- HPS has identified that the results of the microbiological presence of an

Example of matters discussed

- The Comms team discusses its
- SFCIU discusses whether a product recall shouİd be

The SITREP contains

Distribution of which is limited to those managing the incident.

5.9 Managing Concurrent Incidents

FSS may need to manage multiple incidents at any given time, requiring additional resources and requiring response teams to balance competing priorities. This is particularly true for senior leadership roles where individuals may be members of multiple response teams (e.g. the Strategic Business Incident Team (SBIT) and the SIT) when responding to food/feed and business incidents simultaneously, or where two separate incidents require strategic decisions and direction. The uncertain and pressurised nature of incidents mean that it is difficult to recommend a prescriptive solution to manage concurrent incidents. However, there are guiding principles that should be considered:

- The Facilitators in each response team will liaise with the respective Chair to allocate resources, resolve any conflicting demands, and identify cross-cutting issues that may require collaboration between the different response teams.
- Ultimately, all decisions related to the prioritisation and resources during concurrent incidents will be made by the ELT.
- Every role within FSS's response teams (for food/feed and business incidents)
 have assigned capable deputies (primary, secondary and reserves), which are
 outlined in the internal critical roles response document. This will provide further
 resilience for FSS to resource the response to multiple incidents if required.

Figure 10 below illustrates a possible approach to managing concurrent incidents through the establishment of daily response rhythms – in this case for two different Level 3 incidents as an example. This approach is indicative, and the Facilitator, in agreement with the OIT/SIT chairs, should consider the requirements of each response and set the appropriate 'battle rhythm'.

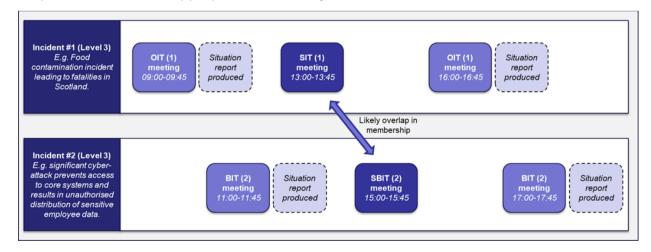


Figure 10: Indicative daily response rhythm when responding to concurrent incidents. This includes the response teams (SBIT/BIT) set up to manage a business related incident in the BIMF.

5.10 Communication

The ICP should be consulted for all internal/external communication processes and materials. The ICP can be found here and is maintained by the FSS Communications team.

5.11 Ministerial Briefings

The Briefing Manager is responsible for developing ministerial briefings with the OIT Communications Manager as required. Once developed, ministerial briefings should be approved by the SIT Chair. If the SIT has not been activated, the briefing should be approved by the OIT Chair.

5.12 Stakeholder management

The OIT Communications Manager is responsible for the coordination of stakeholder communication and maintaining the stakeholder engagement matrix. This does not mean they are responsible for contacting all stakeholders, but are responsible for the coordination and updating of the documentation. The Communications Manager should attend each OIT meeting with a populated stakeholder matrix, and assign OIT members (and SIT where needed) as owners for each stakeholder. Individuals are then responsible for contacting relevant stakeholders in a timely fashion. In the event that it is deemed beneficial to brief Stakeholders collectively, a Birdtable meeting may be established.

5.12.1 Birdtable Meetings

Birdtable meetings facilitate the effective management of the incident by ensuring communication between all major stakeholders and partners. The aim of these meetings is to provide brief situation reports on all aspects of the incident to those concerned in its management, which may include OGDs, delivery partners and external stakeholders, to encourage a coordinated and cooperative response.

The Briefing Manager is responsible for establishing Birdtable meetings in liaison with the OIT Comms Manager. During a Level 2, the OIT Chair is responsible for chairing Birdtable meetings when the SIT has not been activated. More information can be found in the OIT IMP.

5.13 Clearance process

The OIT/SIT Chair has ultimate sign off and decision making capability within each team during incident management for Level 2 and 3 incidents.

During Level 4 incidents, where SGoRR is established, it is likely that external communication and stakeholder messaging would be discussed with the Scottish Government and cleared in conjunction with the SIT chair and SGoRR.

5.14 Resource

As outlined in the FSS/FSA MoU, support can be can be obtained from FSA to support incident response roles, if required. In addition, specialist advice may be sought from FSA, SEPA, SG, DEFRA or APHA, depending on the incident type.

During a prolonged event it will be necessary to consider staff welfare and wellbeing as a priority due to potential changes in circumstances and working arrangements. All OIT and SIT members deputies and reserves can support surge capacity and long running incident responses. The responsibility to ensure sufficient resourcing sits with both OIT and SIT Chairs and the Facilitator who can liaise with FSS's HR team should additional support be required.

5.15 Lead Agency

Depending on the nature of the incident, FSS may or may not be the 'Lead Agency'. This depends on a number of factors, some of which are outlined in the table below.

- In situations when FSS is the lead agency, the battle rhythm can be set by the Facilitator, in conjunction with OIT/SIT chairs, early in the response (day 2 onwards).
- When **FSS** is <u>not</u> the lead agency, the Facilitator must take external IMT/FSA/SGoRR meetings (as applicable) into account when setting the internal battle rhythm. A suggested battle rhythm during a Level 3 incident with an external IMT formed is detailed in section 5.8 above.

The below table outlines the designated lead agencies in a variety of potential incident scenarios.

| Situation | Lead Agency | FSS's role |
|---|---|--|
| A Scottish outbreak of foodborne illness, which leads to the activation of the Incident Management Team (IMT) | PHS leads the response A Consultant in Public Health Medicine (CPHM) is appointed to lead the IMT If it is a UK wide incident UKSHA will lead the response. | Coordinates the Scottish food incident response with Local Authorities. Attend IMT meetings/ chairs food sub-group as required |
| UK wide incident with distribution across the UK including Scotland. | FSA leads the response in accordance with FSA Non- routine Incident Management Plan | FSS are core representatives at FSA incident meetings from the outset following establishment of incident response structure in line with . UK-Wide incident management arrangements |
| An incident which originates in Scotland with no distribution outside Scotland | FSS leads the response | Manage the incident in accordance with FSS's incident management procedures |
| An incident which originates in Scotland with distribution outside Scotland | FSS will continue to lead the incident, unless it is mutually agreed that it is more appropriate for the FSA to lead. | Manage the incident in accordance with FSS's incident management procedures / FSS representatives join FSA incident meetings, as required (whichever is applicable) |
| A level 4 incident that requires the activation of the Scottish Government Resilience Room (SGoRR) | SGoRR leads the response | Adhere to FSS's incident management procedures and to provide food safety advice to SGoRR |



5.15.1 Scottish Government central response

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 SGoRR in line with Preparing Scotland Guidance¹¹. Ministers would expect senior FSS representation at this meeting with the relevant authority and accountability. This is likely to be the FSS Chief Executive or nominated deputy. They will be expected to provide detailed information about the ongoing incident and are encouraged to invite a colleague who will have a full understanding of the tactical & operational issues.

5.15.2 Cross border incidents

Cross border incidents require constant communication and coordination between FSS and FSA. Liaison between the teams should be made immediately, and at the appropriate levels. The precautionary principle should be applied here, in order to ensure sufficient resource and expertise early on in an incident.

5.15.3 Out of hours response

A member of the ELT, the Incidents team and Communications team are all on call 24/7 as standard. For the remaining branches (Science Division, LA Delivery, Operational Delivery and Regulatory Policy Division) there is no formal permanent on call provision but branch heads are contactable as required.

In the event of a long running Level 2 or above incident, an on-call rota will be introduced for both the OIT and SIT core team members. This is a decision made by the OIT Chair for operational staff in the event of a Level 2, and the SIT Chair for Senior Management staff in the event of a Level 3/4 incident.

5.15.4 Shift handover

The template in section 8.11 can be used to provide timely, consistent and comprehensive updates to all team members, particularly during handover for a change of shift. It can either be completed in detail or the template can be used as an agenda/prompt for a verbal handover if needed.

The shift handover should be staggered in order to ensure all team members are not lost at the same time. It is also advisable to have the person coming on shift shadow the outgoing team member for an agreed period of time in order to familiarise themselves with the incident updates and latest information.

¹¹ https://www.readyscotland.org/ready-government/preparing-scotland/ V2.0



6. Stand down and Post - Incident Review

6.1 De-escalation

The classification of an incident should be re-assessed throughout the response. In the event that the classification of an incident changes or the requirements for managing the incident reduce, a de-escalation plan should be considered by the teams. The decision to de-escalate will be taken by the most senior team that was set up to lead the response i.e. If a SIT was established, then the SIT will decide whether it is appropriate to de-escalate.

The chair of the most senior team leading the response will review any outstanding actions to ensure it is appropriate to de-escalate and/or close the incident.

If a decision is made that a FSS response is no longer appropriate, the stand down process will be initiated. All response level changes will be communicated formally both internally and externally to those involved in the response and with FSS staff, if required.

6.2 Post Incident Review

Upon return to business as usual, each significant incident should be used as an opportunity to assess, learn, rebuild and adapt where necessary.

Post-incident reviews take place for 10% of Level 1 incidents and will take place for all Level 2 and above incidents. Members of the associated IAT, OIT and SIT will be responsible for participating in and contributing to these reviews. Additional participants (ie. stakeholders, FSA etc.) may also be invited to contribute as appropriate.

This activity will assist FSS's ability to secure long-term recovery from the incident and further enhance its incident preparedness capability.

6.2.1 Hot Debrief

A post incident review using the hot debrief template (section 8.10) should take place as soon as possible after the incident is closed.

Additional questions below can guide a team discussion and they can also be used in conjunction with, or as an alternative to, completing individual forms:

- What did not work well, causing problems, unplanned events and failings?
- How effective was communication within and between teams handling the incident?
- In what ways, if at all, could the incident have been avoided or reduced in magnitude from a reputation management perspective?
- What worked well during the incident response?



- Which actions/resources made a difference in our response? Which actions/resources might have made a difference if they had/had not been available?
- How did you feel during the response e.g. in relation to the shift length, strain on resources, allocation of business as usual responsibilities etc.?
- How well did our Business Incident Management plans work? Does anything need to change to make the process/tools more effective?
- To what extent was our communication and stakeholder engagement strategy/approach successful in managing this incident? How could it have been improved?
- What is our assessment of any news media coverage generated as a result of the incident and its impact on the organisation: staff? general public? Scottish and/or UK Governments? Reputation?
- In what ways, if at all, could we have managed media coverage more effectively?
- What would we do differently if we had to do it all over again?

6.2.2 Lessons Learned

All team members will be encouraged to consider any lessons learned when the topic is covered as a standing agenda item at OIT and SIT meetings. This is to address any issues that may require immediate action during an incident.

All lessons captured during and after the incident will be incorporated into <u>FSS</u> <u>Lessons Learned Log</u> (section 8.10), which is managed by the Resilience team in the Enforcement Delivery team. The log is reviewed quarterly by the DGG as part of our continuous improvement approach and will ensure relevant actions are taken forward in a timely manner to support any recovery phase or future incident.

7. Preparedness

7.1 Training

Training Needs Analysis (TNA) will identify the requirements for training, from initial induction training through to regular training activity for all FSS staff. This will allow FSS to identify and train all staff who have a role to play in responding to an incident. Those nominated as primaries, secondary or reserves staff at the OIT/SIT are required to undergo mandatory incident management training before fulfilling a role on either team.

Those required to be part of the OIT or SIT should have this reflected in their business roles & responsibilities and objectives. All individuals nominated to fulfil a role on the OIT or SIT must participate in mandatory incident management training before they fulfil any role on the team. They are also required to take part in the exercise programme on a basis defined by the TNA.

This training requirement applies to all relevant existing FSS staff, staff promoted into new roles, and all staff recruited in the future.

Training will be the responsibility of the Resilience Manager and will aim to take place annually.

7.2 Exercising

An annual programme of selective training exercises (internal & external) will be established and delivered to ensure FSS is prepared to deal with incidents. These exercises will build on the initial familiarisation training and provide progressive exercises, from desktop discussions to full scale simulations. These sessions will be followed by a detailed exercise report, and any recommendations for further improvement will be captured in the master lessons learned log for action.

7.3 Review

The Incident Management Framework and other documentation will be reviewed as follows:

- An administrative review of the FSS Critical Response Roles document, key contacts and phone numbers every three months by the Resilience Manager.
- Following its invocation and in the event that any areas for development have been identified.
- Following an exercise in the event that any areas for development have been identified.
- In the event that significant re-structuring take places within the organisation.
- A management review of the IMF principles & policies by the ELT as result of any
 of the above activities.
- A record of the reviews will be held in the Document Review section of the Incident Management Framework on Page 2.



8. Tools and templates

8.1 IAT Meeting Agenda

The IAT Meeting Agenda should be used by the Incident Manager (as the meeting chair) during every IAT meeting.

The agenda will support the team to build situational awareness, obtain initial thoughts on incident classification and receive key updates from IAT team members. This will enable team members to agree the final incident classification and decide the appropriate course of action (i.e. whether an OIT or SIT should be activated).

The IAT Meeting Agenda can be found internally here.

At the end of every meeting, a list of actions and assigned owners/deadlines should be completed and captured in the Decision Log and the Issues & Actions Log (see section 8.6 & 8.7). A SitRep should also be completed by the Information Manager at the end of each IAT meeting (see section 8.8).

| Item | De | Description | | | | | | |
|------------------|--|--|--|--|--|--|--|--|
| | Roll call – is everyone present that is required? | | | | | | | |
| 1. Open Meeting | Confirm team roles – new members to introduce themselves (including gender pronoun if desired) | | | | | | | |
| | Gain update from the Incident Man | ager on the situation | | | | | | |
| 2. Situation | What? Where? When? Who? How? W | hy? | | | | | | |
| | Current status of the Scientific Risk Assessment | | | | | | | |
| | Receive updates from each role: | | | | | | | |
| 3. Updates from | 1. Science Representative | 2. Communications Representative | | | | | | |
| IAT members | 3. Regulatory Representative | 4. Enforcement Representative | | | | | | |
| 4. Incident | Based on the information known, wh | at should the incident classification be at this | | | | | | |
| Classification | stage? Review the Incident Classifica | tion Matrix. | | | | | | |
| 5. Issues | Identify the salient issues in relation | to the incident | | | | | | |
| 6. Actions | Assign owners and deadlines | | | | | | | |
| 7 Decisions | Should the OIT/SIT be notified and mobilised? | | | | | | | |
| 7. Decisions | Has any risk communication been iss | ued? | | | | | | |
| 8. Close Meeting | Confirm date and time of next meeting | ng (if applicable) | | | | | | |

8.2 OIT Meeting Agenda

The OIT Meeting Agenda should be used by the OIT Chair during every OIT meeting. The agenda will support the team to build situational awareness, obtain initial thoughts on incident classification and receive key updates from branch representatives/external agencies as required. The agenda also prompts the OIT to consider the appropriate course of action (i.e. whether the current incident classification is appropriate, or whether further escalation/de-escalation is required).

The OIT Meeting Agenda can be found internally here.

At the end of every meeting, a list of outstanding issues, actions and assigned owners/deadlines should be completed and captured in the Issues & Actions Log (see section 8.7). Decisions with the associated rationale should also be captured in the Decision Log (see section 8.6). A SitRep should also be produced (or updated) by the Information Manager at the end of each OIT meeting (see section 8.8).

| Item | D | escription | | | | |
|-----------------------------|---|--|--|--|--|--|
| 1. Open Meeting | Roll call – is everyone present that is required? Confirm team roles – new members to introduce themselves (including gender pronoun if desired) | | | | | |
| 2. Situation Update | Gain update from the Incident Manager on the situation What? Where? When? Who? How? Why? Review of Risk Management decisions made to date | | | | | |
| 3. Actions Review | If necessary, run through the Action List from the previous OIT meeting | | | | | |
| 4. Objectives | Reconfirm our objectives? Confirm the role of the team. Why are we here? | | | | | |
| | Receive updates from each role: | | | | | |
| | 1. Science Manager | 2. Regulatory Manager | | | | |
| 5. Role Updates | 3. Communications Manager (including stakeholder matrix) | 4. Enforcement Manager | | | | |
| | 5. Briefing Manager | 6. Additional Roles (if present) | | | | |
| 6. Risk Communications | Review the Communications Strategy and key | messages. | | | | |
| 7. Issues | Identify the salient issues in the incident (cons | sider the Wider Risk Assessment) | | | | |
| 8. Actions | Identify the associated actions against each is: | sue. Ensure each action has an owner and a deadline | | | | |
| 9. Decisions | Identify any decisions made based on the in Decision Making Model | formation currently known. Consult the Risk Management | | | | |
| 10. Incident Classification | Review the incident classification based on escalation/de-escalation required? | the known information – is it still the same? Or, is | | | | |
| 11. Resources/Impact on BAU | Additional resource required? What is the im and Pause template to assess the situation) | pact on FSS BAU? (Please, consider using the Stop, Start | | | | |
| | Briefly take note of any recent learnings from | the current response. | | | | |
| 12. Lessons Learned (if | Consider scheduling a more structured hot debrief to identify lessons learned. | | | | | |
| appropriate) | What's working well? | | | | | |
| | What's not working well? | | | | | |
| | ' | r for consideration after the incident? | | | | |
| 13. Close Meeting | Confirm date and time of next meeting | | | | | |

8.3 SIT Meeting Agenda

The SIT Meeting Agenda should be used by the SIT Chair during every SIT meeting.

The agenda will support the team to build situational awareness, obtain initial thoughts on incident classification and receive key updates from branch representatives/external agencies as required. The agenda also prompts the SIT to consider the appropriate course of action (i.e. whether the current incident classification is appropriate, or whether further escalation to SGoRR/de-escalation is required).

The SIT Meeting Agenda can be found internally here.

At the end of every meeting, a list of outstanding issues, actions and assigned owners/deadlines should be completed and captured in the Issues & Actions Log (see section 8.7). Decisions with the associated rationale should also be captured in the Decision Log (see section 8.6). A SitRep should also be produced (or updated) by the Information Manager at the end of each SIT meeting (see section 8.8).

| Item | | Description | | | | | | |
|--------------------------------|---|--|--|--|--|--|--|--|
| | Roll call - is everyone present that is requ | ired? | | | | | | |
| 1. Open Meeting | Confirm team roles – new members to introduce themselves (including gender pronoun desired) | | | | | | | |
| 2. Situation Update | ain a situation update from the Incident Director (=OIT Chair) That are the facts and impacts of the incident? | | | | | | | |
| 3. Actions Review | If necessary, run through the actions list f | necessary, run through the actions list from the previous meeting. | | | | | | |
| 4. Objectives | What is our strategic intent? | | | | | | | |
| | Receive updates from each role: | | | | | | | |
| | 1. Science Director | 2. Communications Director | | | | | | |
| 5. Role Updates | 3. Regulatory Director | 4. Enforcement Director | | | | | | |
| | 5. Legal | 6. Additional Roles (if present) | | | | | | |
| 6. Risk Communications | Review the Communications Strategy and | Key messages | | | | | | |
| 7. Issues | Identify the salient issues in the incident | | | | | | | |
| 8. Strategy & priorities | Consider the worst-case scenario. Consider future implications. | | | | | | | |
| | What's our main effort right now? Review the stakeholder matrix - who needs to know what and when? | | | | | | | |
| 9. Stakeholders | | | | | | | | |
| 5. Stakenolders | Does the SIT need to engage with any stakeholders? Does the Board need to be briefed? | | | | | | | |
| 10. Actions | Identify the actions. Ensure each action ha | as an owner and a deadline | | | | | | |
| 11. Decisions | Identify any decisions made based on the | information known | | | | | | |
| 12. Incident Classification | Review the incident classification based o escalation/de-escalation required? | n the known information – is it still the same? Or, is | | | | | | |
| 13. Resources/Impact on BAU | What resources and coordination are n consider using the Stop, Start and Pause t | eeded? What is the impact on FSS BAU? (Please, template to assess the situation) | | | | | | |
| | Briefly take note of any recent learnings fr | rom the current response. | | | | | | |
| | Consider scheduling a more structured ho | t debrief to identify any lessons learned. | | | | | | |
| 14. Lessons Learned (if | What's working well? | | | | | | | |
| appropriate) | What's not working well? | | | | | | | |
| | What needs to be improved now or for consideration after the incident? | | | | | | | |
| 15. Close Meeting | Confirm date and time of next meeting | | | | | | | |

8.4 Information Board

This should be referred to during the course of the meeting by the chair, to ensure the team objectives are driving the response to the incident.

| Information Board | Incident No: |
|--|--|
| Facilitator: | Date/Time: |
| Situation | Risk Communication |
| What do we know? | What has been issued? |
| • | • |
| Assumptions What do we think we know ? | Missing Information What do we need to know? |
| • | • |

8.5 Objectives Board

The Objectives Board should be populated and managed by the Facilitator and uploaded into CLIO. This should be visible throughout the response (either in the Incident room for OIT/SIT meetings or in CLIO if being managed remotely) room, and updated in line with FSS's operational and strategic incident objectives. The template is available internally here.

| | | Objective | es Board | |
|-----------|---|-----------|--------------|--|
| Team: | | | Incident No: | |
| | | 1. | | |
| | | 2. | | |
| response? | r objectives in this trying to achieve? | 3. | | |
| | | 4. | | |
| | | 5. | | |

8.6 Decision Log

The Decision Log should be populated and managed by the Information Manager and uploaded onto CLIO after every meeting. The template is available internally here.

The Decision Log should have the decision made by the OIT/SIT, as well as the rationale/justification for the decision based on the information known at that time. New Information should also be captured in the log, which provides a record of the known information at the point at which a decision was made.

The Decision Log should be signed by the Chair (with the signature printed/provided electronically) and then uploaded into CLIO following every meeting. This serves as an audit log of decisions made during an incident.

| | Decision Log | | | | | | | | | | |
|-------|--------------|----------|---|-------------|-------------|--|----------------|-----|--------------------|--|--|
| Infor | rmation | Manager: | | | | | Incident No: | | | | |
| Date | | | | Time: | | | Meeting type & | No: | | | |
| # | D/NI | | D | ecision/New | Information | | | | Rationale/Comments | | |
| 1 | | | | | | | | | | | |
| 2 | | | | | | | | | | | |
| 3 | | | | | | | | | | | |
| 4 | | | | | | | | | | | |
| 5 | | | | | | | | | | | |
| 6 | | | | | | | | | | | |
| 7 | | | | | | | | | | | |
| 8 | | | | | | | | | | | |
| 9 | | | | | | | | | | | |
| Mee | ting Cha | ir: | | | | | Date: | | | | |
| Sign | ied: | | | | | | Time: | | | | |

8.7 Issues & Actions Log

The Issues & Actions Log should be populated and managed by the Information Manager (and Admin Support as required) during each SIT and OIT meeting. The template log is available internally here which includes a list to keep track of meeting attendance to assist with the allocation of an action owner and a section to summarise the key issues. Each action should have a deadline and its status kept updated using the drop down list on the template. Many teams (and meeting Chairs) find it useful to have the Issues & Actions Log displayed in the response room to keep track of the actions during the meeting and then recap at the end of the meeting.

The Information Manager should download this document and save as a new version in eRDM to be edited and saved in CLIO once complete after each meeting.

| | Issues and Actions Log | | | | | | | | | | | |
|---|------------------------|--------------------------|----------------------|--------|-----------|---------|----------|--|--|--|--|--|
| | Incide | nt Number: | | | | | | | | | | |
| Fond | Date/Time | file updated: | | | | | | | | | | |
| Standards Scotland Inbhe Bìdh Alba | | endance sponse Role): | | | | | | | | | | |
| BIGIT AIDG | Summary | of key issues: | 1. 2. 3. 4. | | | | | | | | | |
| Date | Time 🕝 | Meeting type | Issue 🔽 | Action | By when 🔽 | By whom | Status 🔽 | | | | | |
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8.8 Situation Report

The Situation Report (SitRep) PowerPoint template is available internally here and is designed to provide an overview of the current situation. This includes a snapshot of the incident; key issues and potential risks that each team faces; current actions and response activities, collate any enquiries received in relation to the incident (if required) and; the time of the next meeting and report. The SitRep should be populated and updated by the Information Manager (and Admin support as required). This will include input from each role in the OIT/SIT team as needed.

During an Incident the OIT and/or SIT Chairs should agree with the Facilitator when the SitRep should be updated and distributed i.e. after each incident meeting, at set times throughout the day or when significant new information is received for example. Once completed, the Information Manager should upload the SitRep to CLIO and circulate to the agreed distribution list.

8.9 Stakeholder Management Matrix

The Stakeholder Management Matrix provides an overview of the internal and external stakeholders involved in the incident and it is available internally here. The Communications Manager is responsible for populating and maintaining the matrix. It should be stored and circulated electronically using CLIO.

It is not the Communications Manager's responsibility to make contact with all stakeholders. This task will be delegated to the most appropriate person within FSS.

The Communications Manager will bring the most up-to-date matrix to OIT meetings to update the team on the current stakeholder engagement status.

| Stakeholder Management Matrix | | | | | | | | |
|-------------------------------|-------|----------|----------------------|--------|--|--|--|--|
| Communications Manager: | | | Last Updated: | | | | | |
| Stakeholder | Owner | Priority | Method of engagement | Status | | | | |
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8.10 Hot Debrief and Lessons Learned Template

A blank version of the hot debrief and lessons learned templates are available internally here. The Facilitator is responsible for completing the templates with input from all team members when the topic is covered as an agenda item during and after an incident.

The Facilitator should download this document and save as a new version in eRDM to be edited and saved in CLIO once complete



| S | andards |
|---|------------------|
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Lessons Learned - Hot Debrief Template

| Туре | What's working well? | What's not working well? What could be improved on? | What needs to be improved now? | What needs to be considered for improvement after the incident is over? | Suggested recommendation/action? |
|--|----------------------|--|--------------------------------|---|----------------------------------|
| Activation/notification of the incident | | | | | |
| Communications (Internal and External) | | | | | |
| Decision Making | | | | | |
| Facilities/Equipment | | | | | |
| Governance | | | | | |
| Information Management (Internal and External) | | | | | |
| Procedures (Plans, Protocols and Tools) | | | | | |
| Recovery (to be considered as part of recovery planning after an incident) | | | | | |
| Resourcing/Teams/Roles (staff and structures) | | | | | |
| Stakeholder Management | | | | | |
| Strategic Response | | | | | |
| Training | | | | | |
| Other | | | | | |

| Stand Scotla Inbhe Bìdh | ards nd | | | Less | ons Learned Log | | | | | | | | | |
|----------------------------------|------------|--------------|--|------|-----------------|------|--------------------------------|------------------------------------|---|---|----------------------------|----------------------|--|--|
| | | | | | | | | | | | | | | |
| LESSON NO. | DATE | BY (name) | INCIDENT/EXERCISE (name of incident or exercise) | | observation) | TYPE | PRIORITY (Low,Med,Hig h) | SUGGESTED RECOMMENDATION/ACTION | SUGGESTED OWNER (branch or group) | TIMESCALE TO ACHIEVE (Short,Med,Lon g) | COMMENTS / ACTION TAKEN | RESPONSIBLE OWNER | STATUS (Not started,Underway,Complete) | |
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8.11 Shift Handover Log

OIT and SIT team members should use the Shift Handover Log to support them as they handover to a team member and it is available internally here. The template is designed to provide structure to the handover process and prompt the team members to give a full briefing when they handover.

| Shift Handover Log | | |
|---------------------------------|---------|--|
| Role: | | |
| Time and Date of Handover: | | |
| Outgoing: | Signed: | |
| Incoming: | Signed: | |
| Overview: | | |
| Actions Completed: | | |
| Actions Outstanding: | | |
| Potential Challenges/Issues: | | |
| Additional Information: | | |

Annex A - Role Profiles

The following role profiles provide an overview of the required experience, skills and level of seniority required for each incident management position as part of FSS's Incident Management Framework.

| Role | Profile |
|------------------------|---|
| OIT Chair (= Incident | Senior figure within the Incidents Team |
| Director) | Good leadership skills with the ability to effectively and efficiently run team meetings |
| | Calm under pressure |
| | Well established relationships with the Incidents Team and Incident Support Team |
| Incident Manager | Good level of knowledge and experience of food and feed incidents |
| | Is able to provide a succinct brief on the incident situation |
| | Holds good relationships with operational stakeholders |
| | Remains calm under pressure |
| Communications Manager | Member of the Communications branch |
| | Considers incidents and crises through the lens of the public |
| | Is able to provide the OIT with a succinct brief on any communication or reputation issues |
| | Has good communication skills and is able to effectively act as the link between the OIT and the supporting branch team |
| | Experience of risk mapping and scenario planning |
| | Extensive knowledge of FSS's stakeholder external landscape |
| | Able to assess the potential reputational impact for FSS |
| Science Manager | Member of the Science Division |
| | Has extensive scientific knowledge and experience in relation to food and feed incidents |
| | Is able to provide the OIT with a succinct brief on any scientific issues |
| | Has good communication skills and is able to effectively act as the link between the OIT and the supporting branch team |
| Enforcement Manager – | Member of the Enforcement branch/Feed Delivery/Operational Delivery |
| Enforcement Delivery | Has extensive enforcement knowledge and experience in relation to food and feed incidents |

| Role | Profile |
|---|--|
| Enforcement Manager – Feed Delivery | Is able to provide the OIT with a succinct brief on any enforcement issues Has good communication skills and is able to effectively act as the link between the OIT and the supporting branch team |
| Enforcement Manager – Operational Delivery | |
| Regulatory Manager | Member of the Regulatory Policy Division Has extensive regulatory knowledge and experience in relation to food and feed incidents Is able to provide the OIT with a succinct brief on any regulatory issues Has good communication skills and is able to effectively act as the link between the OIT and the supporting branch team |
| Briefing Manager | Member of the Private Office Has extensive experience writing ministerial briefings Excellent writing and communication skills |
| Deputy Managers | Extensive knowledge of the operational detail in their division/branch. Excellent communications skills Able to support their manager at the OIT |
| Incident Support | Good experience in food/feed incidents Able to support the Incident Manager at the OIT |







| Role | Profile |
|---------------------------------|---|
| SIT Chair | Must be Deputy Chief Executive & Director of Policy, Science and Operations or nominated deputy. Extensive leadership experience with the ability to lead the SIT through the process of making decisions efficiently Remains calm under pressure Has the ability to adapt their leadership style to bring the best out of the team during challenging periods Authority to approve strategy, actions and messaging Relationship with priority external stakeholders Good level of understanding of food and feed incidents Good level of understanding of business functions and their responsibilities |
| Incident Director (= OIT Chair) | Senior figure within the business or SFCIU Good leadership skills with the ability to effectively and efficiently run team meetings Has good communication skills and is able to provide the SIT with a succinct brief on the situation Has good organisational skills and is able to effectively act as the link between the SIT and OIT Well established relationships with the Incidents Team and Incident Support Team Remains calm under pressure |
| CEO | Extensive leadership experience with the ability to support the SIT Chair through the process of making decisions efficiently Remains calm under pressure Extensive knowledge of their business functions/subject areas to advise on strategy, actions and messaging in relation to these functions Relationship with key stakeholders Good level of understanding of food and feed incidents |







| Role | Profile |
|---|---|
| Communications Director | Senior representative of their branch Thinks strategically and is alive to the potential impact of an incident on industry and the wider economy Considers issues and crises through the lens of the public and what is in the best interests of consumers Able to advise on the strategic direction of communications during an incident and how the media narrative may impact on FSS's reputation Extensive knowledge of FSS's stakeholder external landscape Strong relationships with operational personnel within their branch |
| Enforcement Director – Enforcement Delivery (including feed) Enforcement Director – Operations Delivery | Senior representative of their branch Subject matter expert Strong relationships with operational personnel within their branch Ability to apply strategic perspective to the incident |
| Science Director | Senior representative of their branch Subject matter expert Strong relationships with operational personnel within their branch Ability to apply strategic perspective to the incident |
| Regulatory Director | Senior representative of their division Subject matter expert Strong relationships with operational personnel within their branch Ability to apply strategic perspective to the incident |
| Food Crime Director | Role fulfilled by the Head of SFCIU (and only required if the Head of SFCIU is not the Incident Director. |







| Role | Profile |
|-----------------------|---|
| Legal | Senior member of the SGLD |
| | Considers issues and crises from a legal perspective |
| | Understanding of FSS objectives, and how these can be achieved within the constraints of legal considerations |
| | Good writing skills |
| | Confident – able to deal with objections to advice provided to FSS, and advise against suggested actions that may pose a legal risk |
| | Well organised, with a high attention to detail |
| Facilitator | Visible and well respected figure within the organisation |
| | Excellent organisational skills with a high attention to detail |
| | Relationship with, and understanding of, key internal branches |
| | Good time management |
| | Able to summarise information efficiently |
| | Confident and competent in handling several tasks simultaneously |
| | Is comfortable engaging with the senior level of the organisation |
| | Has an excellent understanding of FSS's incident management processes |
| Information Manager / | Good communication and writing skills |
| Admin Support | Able to summarise information efficiently |
| | Well organised with a high attention to detail |
| | Good level of IT proficiency and adept at using CLIO |
| | Good time management |
| | Confident and competent in handling several tasks simultaneously |
| | Uses initiative – able to assess and address administrative requirements without direction |







| | Responsibilities |
|--|---|
| Role of the Board - Incident Management | Risk: Review and agree FSS' incident risk appetite annually for the Executive and how this may be impacted during an incident |
| | Governance: Review and approve FSS' Incident Management Framework to determine the appropriate response structure and be assured that procedures are in place to deliver consumer protection |
| | Assurance: gain assurance that FSS can effectively manage incidents through receiving updates on: |
| | training and exercising takes place as appropriate to build incident management capability within the organisation |
| | continuous improvement is in place and lessons are learnt from recent incidents and reflected in future updates of the Incident Management Framework and plans. |
| | Board preparedness: participate in incident management exercises |
| | During incidents, the Board supports the Executive and receives assurance in the following ways: Stakeholders: where appropriate, support with stakeholder engagement, for instance with Ministers, Members of Scottish Parliament or industry Reputation: support Executive actions to protect public health during an incident, whilst ensuring |
| | FSS's reputation as a trusted organisation remains intact. |
| | • Assurance: Through the Chair, or deputy, receive assurance that the incident is being prosecuted in accordance with the Incident Management Framework. |
| Role of the Chair | The responsibilities of the Chair, or their deputy, are as follows: |
| The Chair acts as the | Act as the link between the Executive and the Board |
| key liaison between the Executive and the remainder of the Board during incident management. | In discussion with the Chief Executive, determine if and when the Board should be briefed on issues and incidents that constitute a level 3 and above or may escalate to cause significant concern |
| | Support the Executive in strategic stakeholder management (i.e. Members of Scottish Parliament) on incident and crises, as required |
| | Act as FSS' media spokesperson during certain incidents, as required. |







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• Act as a sounding board for the Chief Executive, as required.









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