

Incident Management Plan for Non-Routine Incidents



DOCUMENT CONTROL

Ownership and maintenance of this Plan and internal supporting documentation is the responsibility of the Resilience Team, part of the Incidents and Resilience Unit of the Food Standards Agency. It will be reviewed on an annual basis.

Version	Date	Reason for change
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Chief Executive Foreword

The main objective of the Food Standards Agency (FSA) in carrying out its functions is to protect public health from risks which may arise in connection with the consumption of food, including risks caused by the way in which it is produced or supplied, and otherwise to protect the wider interests of consumers in relation to food.

Our five year Strategic Plan describes how we will work to achieve our goal of 'food we can trust' and how we will continue to put consumers first in everything we do. Responding effectively to emergencies is critical to meeting these commitments, protecting consumers and building consumer confidence in food.

As the Chief Executive of the Food Standards Agency, I have ultimate responsibility for ensuring that we respond effectively to all food and/or feed incidents.

Investigating and managing incidents to ensure food and feed safety has been, and will continue to be, a crucial aspect of our work. The FSA has investigated over 22,000 food and feed incidents since the year 2000, acting promptly to protect public health and consumer interests. The majority of incidents are dealt with using routine incident management procedures, but when the nature and/or scale of an incident exceeds this scope, this plan will be invoked.

We continue to improve incident response arrangements through continuous testing, conducting lessons learnt exercises and reflection. In addition to our own internal exercise programme the FSA routinely participates in cross-Government emergency exercises. This plan will continue to evolve as part of this learning process.

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

Jason Feeney MBE

Chief Executive Food Standards Agency

1. Aims, Objectives & Scope of Plan

Aim

This Incident Management Plan (IMP) outlines the FSA's procedures for fulfilling its responsibilities in response to <u>non-routine</u> food or feed-related incidents (routine and non-routine incidents are explained in section 2.1 Classification of Incidents). The FSA's objective is to protect public health from risks which may arise in connection with the consumption of food (including risks caused by the way in which it is produced or supplied) and otherwise to protect the interests of consumers in relation to food. The IMP defines the FSA's response to an incident where the FSA takes responsibility, either by statutory requirement, in its role of Lead Government Department, following an actual or potential threat to the safety, quality or integrity of food and/or animal feed or as supporting Department.

AIM

To set out the strategic and tactical arrangements for effective incident management during non-routine incidents affecting food and / or feed in order to protect consumers.

OBJECTIVES

The Plan provides a framework to meet the following objectives:

- Ensure robust command and control procedures are in place;
- Ensure effective mechanisms for escalation are in place;
- Ensure the ability to determine the key parties and resources required to develop and implement an effective response; and
- Ensure effective communication across all parties.

Scope of Plan

This plan provides a comprehensive framework which summarises key activities undertaken during a response to a food and / or feed-related non-routine incident. The Plan establishes common procedures to be followed by all FSA offices across England, Wales and Northern Ireland. Routine incidents are dealt with using a Routine Incident Management Plan (RIMP). The detailed processes which support this IMP are set out in a series of Standard Operating Procedures and guidance (see Annex A).

A Memorandum of Understanding with **Food Standards Scotland (FSS)** is in place to ensure liaison arrangements continue to deliver a coordinated incident handling response across Scotland, England, Northern Ireland and Wales. The Food Standards Scotland Incident Management Plan defines how FSS led incidents are managed (http://www.foodstandards.gov.scot/business-and-industry/safety-and-regulation/food-incidents/incident-management-plan).

2. Definition of an Incident

The FSA defines an incident as:

"any event where, based on the information available, there are concerns about actual or suspected threats to the safety, quality or integrity of food and/or feed that could require intervention to protect consumers' interests".

2.1 CLASSIFICATION OF INCIDENTS

The FSA is responsible for responding to all food and feed incidents and in the initial stages all incidents will be regarded as a potential risk to public health until there is evidence to the contrary. An incident response will be activated for food chain integrity, food authenticity or food fraud issues.

The FSA assigns an 'incident classification' by recognising and understanding the potential impact of an incident and then considering how the incident should be managed in terms of levels of resource and authority. This plan recognises four levels of incidents classification, Routine, Serious, Severe and Major based on the principle of escalation of management. The higher the level of magnitude of incident, the greater the involvement of senior FSA staff, and the more tactical and strategic measures are brought to bear. This may be required even when the FSA is not the Lead Government Department (LGD).

Classification Description

<u>Routine</u> incidents which are dealt with at the operational level using everyday resources and procedures. They make up the majority of incidents dealt with by the FSA. They may involve evidence of illness, impact on vulnerable groups and breaches of statutory limits. They also include incidents such as barn fires or oil spills that have an actual or potential impact on food and feed. In some cases the public or media are likely to express some concern.

<u>Serious</u> incidents are those which cannot be dealt with using everyday resources and procedures and require decision making and resource allocation to be made at a higher level and require the invocation of the incident Management & Co-ordination Group (IMCG) **see section 4.4**.

<u>Severe</u> incidents are those which require Strategic level input and support by the invocation of the Strategic Incident Oversight Group (SIOG) **see section 4.6**. Incidents of this type require significant cross-departmental collaboration and communications strategy and are often longer in duration and have significant impact on resources.

<u>Major</u> incidents are of such significance they require a Central Government coordinated response. Depending on the nature of the incident the FSA may assume various responsibilities including acting as the Lead Government Department. An example would be a nationwide outbreak of a food-borne *E. coli* infection posing a high risk to public health. The *E. coli* outbreak in Germany in 2009 is an example of this. How FSA incident classification relates to the central Government emergency classification is shown in **Annex B.** Other equivalent structures will apply in the Devolved Administrations (for further details see **Annex F**).

3. Alerting, Activation, Escalation and Closure

This section covers the alerting process for the FSA to respond to an incident and also the activation and escalation process which ensures the incident is managed at the appropriate level of authority.

3.1 INITIAL ALERTING

Initial alerting may originate from many sources as shown in the diagram below. Incidents may also be notified via the EU Commission's Rapid Alert System for Food and Feed (RASFF) or the International Food Safety Authorities Network (INFOSAN).

Local Authorities (LAs) have a responsibility under the **Food Law Code of Practice** (with separate codes for England, Scotland, Wales and Northern Ireland) to inform the FSA / FSS of national or serious localised incidents.

The FSA is also informed of incidents via other Government Departments and the emergency services if they consider an incident may potentially impact on food safety. Members of the public can report food safety concerns to the FSA helpline (020 7276 8829) or email helpline@foodstandards.gsi.gov.uk.

Industry, food businesses and enforcement officers should report incidents direct to the Incidents teams across England, Wales and Northern Ireland and the equivalent reporting process for FSS. FSA Incidents teams in England, Wales, and Northern Ireland operate a 24/7 response to food/feed and environmental contamination incidents and can be contacted by telephone and e-mail. Information on incident reporting is available on the FSA website — **'report an incident'.** FSS has its own reporting process in place as detailed within the FSS Incident Management Plan.



3.2 ACTIVATION AND INCIDENT ESCALATION

On receipt of an incident notification, classification of the incident is carried out by means of an Incident Classification Assessment (see **Section 3.3 Risk Assessment in Response to an Incident**).

If during the course of a routine incident it is considered that successful management requires levels of resources and authority beyond those available for normal incident handling, then a decision will be made whether to escalate to non-routine incident classification levels, (as set out under **Section 4 Management of an Incident)**. The table below shows responsibilities for incident lead, the decision to escalate and the lines of accountability, for the incident classification levels. The strategic direction, tactical and operational management during the course of an incident is subject to continuous review and adjustment.

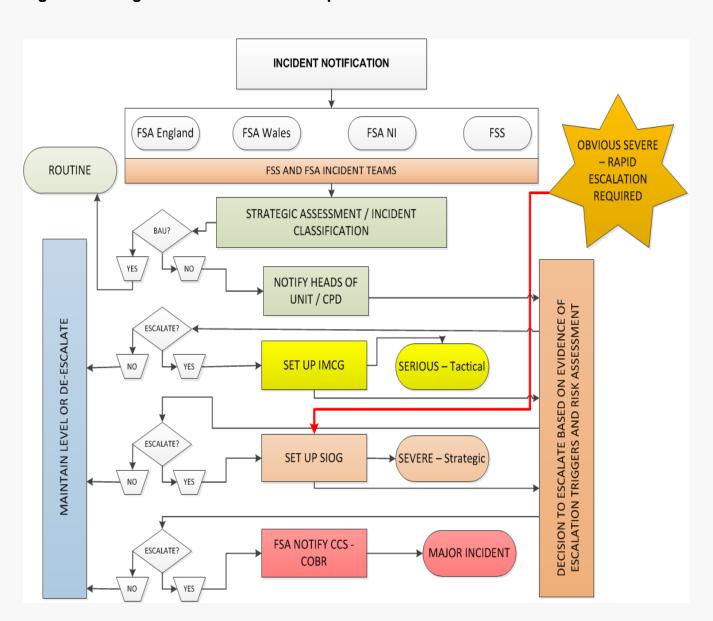
Who is Incident lead?	Who decides escalation and classification?	Accountability
Routine - Incident Manager - Heads of Incidents in England, Northern Ireland & Wales - Equivalents in FSS	Routine to Serious England & National impact incident - Head Incidents and Resilience Unit Devolved Authorities - Heads of Consumer Protection	Routine England & National impact incident - FSA Chief Operating Officer Devolved Authorities - FSA NI and FSA Wales Directors
Serious - The Incident Management and Co-ordination Group (IMCG) - Chair of the IMCG - Appointed Incident Manager	Serious to Severe As for Serious Incident Lead: - IMCG - Chair of the IMCG - Appointed Incident Manager	Serious England & National impact incident - FSA Chief Operating Officer Devolved Authorities - FSA NI and FSA Wales Directors
Severe Strategic Lead - Strategic Incident Oversight group (SIOG) - ¹Strategic Incident Director (SID). Tactical Leads - IMCG - Chair of the IMCG - Appointed Incident Manager	Severe to Major (decision to notify the Civil Contingencies Secretariat) - SIOG - SID	Severe - FSA Chief Executive Officer - SID
Major FSA response is the same as for Severe		Major - FSA Chief Executive - Westminster Government and Devolved Government Ministers

¹ This can be a Devolved Director.

Rapid Escalation: In the case of an obvious severe incident the escalation steps may be taken rapidly. The Head of Incidents and Resilience Unit will immediately notify the Chief Operating Officer, the Chief Executive and the Devolved Administration Directors. It is still important in these instances to make sure the correct incident set up process is carried out.

Major Incidents: Escalation to a Major incident will occur if the severity of the incident is such that it may threaten serious damage to human welfare or serious damage to the environment. In such cases it may be classed as an 'Emergency' in the terms of the Civil Contingencies Act (2004). Those with FSA strategic oversight responsibility will communicate with Cabinet Office and Civil Contingencies Secretariat who then decide whether a central co-ordinated Government response is required and COBR is activated.

Figure showing the escalation decision process



3.3 RISK ASSESSMENT IN RESPONSE TO AN INCIDENT

The purpose of assessing the risk associated with an incident is to determine the potential scale, scope, nature and impact of the incident. There are two components of risk assessment: The Incident Classification Assessment which prioritises and classifies an incident and a Scientific Assessment which determines food safety risks and informs the Incident Classification Assessment. The assessment is co-ordinated by the FSA's Incidents Team with input from relevant policy teams.

Incidents Classification Assessment (ICA)

The Incident Classification Assessment (ICA) is a decision making process that ensures all the factors relevant to determining the nature of an incident are considered. It is auditable and allows strategic and tactical decisions to be recorded in a structured way. It is not a scientific methodology for assessing and quantifying risk.

Guidance on the assessment process is provided in the **Escalation Standard Operating Procedure**. The assessment may require input from scientific and policy experts both internal and external (internal FSA policy teams and external Other Government Departments).

The initial assessment will be largely down to professional judgment of Incidents Team staff, with oversight from the Incident Manager. The ICA will be updated as further evidence and information becomes available. For all incidents (routine and non-routine) the Incident Manager oversees the ICA to help assess the impact and scale of the incident.

The assessment includes indicators of

- health effects
 food integrity risk
 numbers of products or distribution
- consumers affected
 concern levels
 media perceived risk
- tracking and withdrawal
 known incident type
 political engagement

Scientific Risk Assessment

A scientific risk assessment will be undertaken in order to determine risks associated with an incident and informs the ICA. This is commissioned by the Incidents Team and is carried out by the science and policy experts from within the FSA and Other Government Departments such as Department of Health or Public Health England (and their equivalent in Northern Ireland, Scotland and Wales) as required. The scientific risk assessment encompasses the following principles:

- Hazard Identification
- Hazard Characterisation
- Exposure assessment
- Risk characterisation.

3.4 CRITERIA FOR ESCALATION

Key to successful incident response is making sure the incident is managed at the appropriate level. The decision to escalate can seldom be made in empirical terms and judgement and experience will always be brought to bear on the process. Ultimately, it is for those managing the incident to make relevant decisions.

Escalation through the incident response levels is driven by the nature, scale, scope and impact of incidents coupled with the expectations of the FSA to respond. Further information on criteria used to assist the decision on escalation can be found in the **Escalation Standard Operating Procedure**. Escalation to non-routine should be considered even when the FSA is not the LGD as a strategic /tactical response may still be required (with Strategic Incident Oversight Group (SIOG) alerted).

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

MATRIX SHO	MATRIX SHOWING HOW FSA INCIDENT CLASSIFICATION MAY BE APPLIED WITH EXAMPLES OF IMPACTS							
Issue/ classification	Routine	Serious	Severe	Major				
Media	Short lived local interest requiring brief statement	Increasing Regional interest requiring co- ordinated briefings and statements	Prolonged, National interest requiring intense media monitoring and frequent briefings and statements	Sustained national and/or international interest requiring Government level statements				
Public Health	Very localised, isolated cases of short term minor illness	Widespread cases of illness, some requiring short term hospitalisation	UK wide serious and prolonged illness, isolated deaths	Widespread national and/or international deaths				
Industry product	Only 1 small batch affected from a single source requiring simple remedial action	Several batches affected and/or from several sources requiring short term closure of plant(s)	Numerous batches affected industry wide requiring several plant closures for detailed investigation	Widespread national and/or international closures threatening import/export markets				

Consumer Concern	Short term, local consumer concern requiring routine investigation and a brief statement of reassurance	Heightened regional loss of confidence in one or some aspects of the food chain requiring specific internal investigations	Significant National loss of confidence in aspects of the integrity of the food supply chain in the UK requiring co-ordinated defensive briefings and statements and/or Agency wide investigation	Widespread loss of public / industry / international confidence in the integrity of the food supply chain in the UK
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3.5 DE-ESCALATION AND CLOSURE

As the incident draws towards resolution, it may be appropriate to de-escalate to a lower level or to return completely to routine business. The decision to de-escalate will be taken by the Incident Manager and the Chair of the IMCG. If a decision is made that a FSA response is no longer appropriate, then a process will be initiated to close the incident. All response level changes will be communicated formally to those involved in the response, internally and externally. Options to be considered during incident closure should include handing over to FSA teams that can carry out surveillance or monitor corrective measures.

Any decision to de-escalate or close an incident may need to take into account any specific requirements for recovery and the IMCG should consider the necessary strategy, resources and authority for successful recovery. Incidents where recovery is a consideration are radiological incidents and other environmental contamination affecting food. Recovery for major incidents should follow the procedures set out in the Central Government Concept of Operations (CONOPs) using command and control arrangements in place for a major incident.

Once closed, all non-routine incidents are subject to incident review – **See Section 7 Incident Review and Planning**.

4. Management of an Incident

4.1 COMMAND AND CONTROL SET UP FOR NON-ROUTINE INCIDENTS

Once a non-routine Incident has been declared the following basic principles apply when setting up command and control structure:

Which Country takes the lead? The FSA operates a uniform incident response structure, applying these procedures coherently across England, Wales and Northern Ireland. The FSA incident response teams located in each FSA office, lead the response to **routine** incidents within their area. Food Standards Scotland (FSS), following their own procedures, lead on incidents within their country and work closely with the FSA and may handover the incident to the FSA where issues have a UK wide impact. This arrangement ensures the FSA maintains the capability and credibility to access local intelligence and liaise on cross-border issues.

Annex C shows which FSA office leads for different scales of incident.

Incident Meeting Secretariat: For non-routine incidents, the Incident Secretariat will issue a calling notice for the Incident Management and Co-ordination Group meeting or a Strategic Incident Oversight Group meeting. Representation from the Devolved Administrations (and Field Operations), will be included in these meetings. The default physical meeting location is the FSA London office. However, most meetings are now virtual and the standard calling notice includes details of conference call dial in procedures or VC arrangements. For further information see the Non-routine Incident Secretariat Standard Operating Procedure.

Role descriptions during a non-routine Incident are set in the **Roles and Responsibilities SOP**, they include:

Strategic Incident Director	Chief Operating Officer	Chief Scientific Advisor	Note Taker
Incident Manager	Briefing Cell Manager	Communications Director	Policy Expert
Field Operations Manager	Legal Advisor	Head of Science and Evidence	Press Officer
Incident Officer	Media Spokesperson	IMCG Chair	Operational Leads

4.2 INCIDENT TEAM RESPONSE

The detailed characteristics of the Incident Team response are set out in the FSA Routine Incident Management Plan. The Head of Incidents, based on information available, will decide whether an incident is put forward for escalation. They will act as Incident Manager until an incident has been escalated. The Head of Incidents will ensure the Incident Team meet their responsibilities for incident handling. The Incident Manager may decide to convene a meeting of the Incident Management and Co-ordination Group (IMCG) for routine incidents where a co-ordinated response is needed.

4.3 INCIDENT MANAGER

The Incident Manager for Serious and above incidents is appointed by the IMCG and is accountable to their Group Director. The Incident Manager may be the Head of Incidents, the Head of the Incidents and Resilience Unit, the Head of Consumer Protection in the Devolved Administrations; the Head of Division or Head / Head of Team with policy responsibility for the issue.

The purpose of the Incident Manager is to take responsibility for the incident classification and the risk management of the incident, making sure the FSA is effective in taking corrective action. The Incident Manager will need to be able to understand the technical issues and the nature of the risk management strategies needed.

The role of the Incident Manager is deliberately separate to that of the Incident Management Co-ordination Group Chair, although the same person can carry out both roles. The Incident Manager will work in synergy with the Incident Management Co-ordination Group Chair.

4.4 INCIDENT MANAGEMENT & CO-ORDINATION GROUP (IMCG)

The purpose of the IMCG is to manage and co-ordinate the response at a tactical level for non-routine incidents.

For Severe and Major incidents the IMCG will have a role in implementing the strategy directed by the Strategic Incident Oversight Group (SIOG).

Membership of the IMCG will be decided depending on the classification level of the incident. The higher level the classification the greater the expectation for more senior staff to attend. The IMCG will appoint an Incident Manager and will confirm any Operational Leads.

For Serious and above incidents the IMCG will make decisions on Battle Rhythm (for definition and examples of Battle Rhythm see **Annex E**), setting up of the Briefing Cell and the Emergency Call Handling Centre (as required), set up of any stakeholder liaison meetings, establishment of operational leads, staff resourcing and financing; setting taskforces to manage operational work streams.

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

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

4.5 INCIDENT MANAGEMENT AND CO-ORDINATION GROUP CHAIR

The IMCG Chair will be the **Head of Incidents and Resilience Unit**, or the **Head of Consumer Protection in the Devolved Administrations**.

For serious incidents where there is no SIOG established and therefore no SID, the IMCG chair will be appointed by the Chief Operating Officer the chair who will be accountable to the Chief Operating Officer for serious incidents. In severe and major incidents where SIOG is established with a SID the IMCG chair will be accountable to the SID.

The IMCG chair will work with the appointed Incident Manager to agree the key determinants of the incident management process.

The IMCG Chair shall also ensure that plans for communications with external stakeholders (e.g. other Government Departments, Local Authorities, industry and consumer groups) are in place so that they are engaged, as and where appropriate. For more information on **FSA Communications Planning see Annex G**.

4.6 STRATEGIC INCIDENT OVERSIGHT GROUP (SIOG)

The objective of the Group is to set strategy and have oversight of incidents classified as Severe and above. The Group's deliberations will be around six key and predefined strategic questions (**see Annex D**). The SIOG strategy will be passed to the IMCG for implementation and any requirements for update reports will be set.

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

The purpose, membership, example agenda and template meeting note for the group are set out in the **Strategic Incident Oversight Group Standard Operating Procedure**.

4.7 STRATEGIC INCIDENT DIRECTOR

The Strategic Incident Director (SID), appointed by the Chief Executive, is responsible for the strategic oversight of the incident. The SID will activate the strategic management structure, including convening the SIOG which they will then chair.

The SID will convene briefing or stock-take meetings with their counterparts in other Government Departments (OGDs) as necessary and in co-ordination with SIOG meeting timings and the incident response battle rhythm.

4.8 OPERATIONAL CASCADE BRIEFINGS

Any Operational leads will be confirmed by the IMCG. They are responsible for specific areas of the FSA's emergency response and will be expected to attend IMCG meetings and other related meetings.

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

For further information see the **Operational Cascade Briefing Standard Operating Procedure.**

4.9 RESILIENCE IN PROTRACTED INCIDENTS

During an incident with a prolonged response phase, it is the responsibility of the IMCG, the Incident Manager, and when necessary, the Strategic Incident Director to establish robust resourcing arrangements such that staff can be rotated and rest periods provided for key staff. Rotation of staff would be co-ordinated, with handover procedures put in place.

A flexible approach will be employed between FSA Incident teams in the three countries (and in liaison with the FSS) to address resource shortfalls. Further to this the FSA will muster suitable resource from across its structure to support and undertake specific roles and functions as the response dictates. Where necessary a decision may be taken to secure additional external resource from outside the FSA.

Command and control arrangements for FSA incident response at all levels are show in the table below:

Central Government Emergency Response (Major)					
Co-ordinates the Ce response	ntral Government	٠		vene COBR and invite nce decided by SIOG	
Common Recognise Picture (CRIP)	ed Information	•			
Stra	tegic Incident O	ver	sight Group (Seve	ere)	
 Chaired by Strategic Incident Director appointed by CEO Sets FSA strategy (severe and major) and has a stocktake role 		•	establish FSA response strategy (see Annex D)		
Incident M	anagement and	Co-	ordination Group	(Serious)	
 Chair agreed by Chief Operating Officer Appoints an Incident Manager Sets incident battle rhythm Tactical application of SIOG's strategy (when Severe or Major incident) Reviews risk assessment Decides risk management strategies 		 Sets up Briefing Cell Establishes the need for Stakeholder & OGD Meetings Receives Sit-Reps Decides a communications strategy Confirms operational leads Confirms financial resources required Considers staff resources – rotation and deployment 			
Management	of Incidents (Ro	utin	e) & Operational	Management	
Incident Response Team: • issues RASFFs • issues Notices – withdrawal, recall and allergy • incident logging					
Other operational aspects of FSA emergency response could include for example:					
Briefing Cell sit-rep owner; Q & A; briefing Sampling / Surveillance Surveys/ monitoring Field Operations Rapid Response Team (FORRT) meat concerns or local monitoring			pid Response am (FORRT) eat concerns or	National Food Crime Unit (NFCU) organised crime / food fraud / online investigations	

5. Major Incidents - UK Government Response

If an incident falls into the central Government emergency classification then a central Government response will be initiated. Central Government will manage this response in accordance with the Cabinet Office **Concept of Operations**', which sets out arrangements for responding to and recovering from emergencies requiring co-ordinated central Government action. FSA incident response arrangements will operate within the Central Government Emergency response structure.

The Cabinet Office Civil Contingencies Secretariat (CCS) decide whether an emergency response should be co-ordinated by Central Government. The SIOG with input from the IMCG, decide when during an incident to notify the CCS.

The CCS will decide which of the central Government emergency response arrangements are needed for a given incident and may choose to call a meeting of a sub-committee of the National Security Council (NSC THRC) and to activate the Cabinet Office Briefing Rooms (COBR – Ministerial or Officials) (for further information see Annex F). Activation of COBR is carried out to facilitate decision making and allow rapid execution of the co-ordinated central Government response. Where COBR (Ministerial) is activated for a food or feed related incident and FSA is considered the Lead Government Department, the Parliamentary Under-Secretary of State for Public Health will normally represent the FSA at Ministerial level COBR meetings. The FSA Chief Executive or designated deputy will brief the Minister in advance of the meeting. The FSA will also seek an invitation for the FSA Chairman/Chairlady to attend Ministerial meetings.

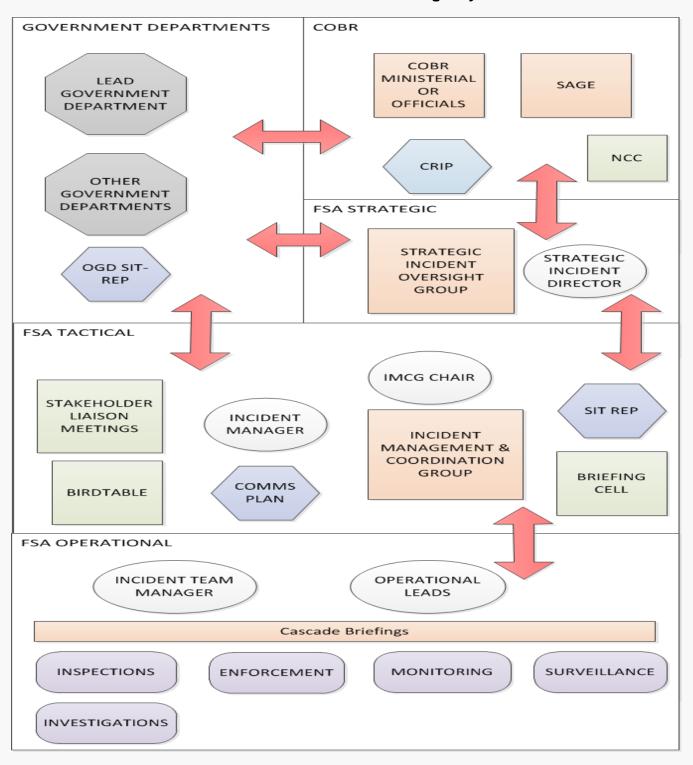
Similar FSA representation to those carrying out Ministerial COBR briefing would be expected at COBR (Officials) meetings. Invitations for the FSA to attend COBR (Ministerial or Officials) are sent by CCS.

Where FSA is considered the Lead Government Department for an incident affecting the Devolved Administrations, the FSA Devolved Director will attend the COBR equivalent for that Administration. There may be also occasions where another Department is lead but the FSA presence at COBR is required to support the cross Government response

Further detail on central Government emergency response arrangements is set out in Annex F – UK Government Response: Description of emergency response arrangements and how they apply across the Devolved Administrations. The Annex provides information on the Cabinet Office Briefing Rooms (COBR), the Scientific Advisory Group for Emergencies (SAGE), the Common Recognised Information Picture (CRIP); the Lead Government Department (LGD); the Scientific and Technical Advisory Cells (STACs) and the News Coordination Centre (NCC). Information is also provided on equivalent structures for the Devolved Authorities including: the Scottish Government Resilience Room (SGoRR); the Emergency Coordination Centre Wales (ECCW); and the Civil Contingencies Group Northern Ireland (CCGNI).

How the FSA command and control structure links to central Government response is shown in the following diagram which sets out the emergency response mechanisms across central Government in relation to FSA incident response at strategic, tactical and operational levels.

FSA command and control interface with national emergency structures



Key



6. Communication Strategy

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

- Give consumers suitable information where they need to act
- Be open about emerging incidents and what the FSA is doing to investigate them, even if we don't know the source
- Protect enforcement action or legal proceedings by not publishing information that may prejudice investigations, unless the need to protect consumers would require immediate release of information.

Further information on the FSA Communications Strategy can be found in **Annex G**.

6.1 COMMUNICATIONS MANAGEMENT

When a food or feed incident is particularly widespread and/or poses an immediate risk to people's health, the FSA will co-ordinate communications. This will involve being the focal point for advice to the public, industry, Non-Government Organisations (NGOs) and local authorities, and also keeping the public informed via the web, press releases, social media and FSA spokespeople. The FSA's role would not extend to compiling or assembling lists of affected products, but the FSA would consider publishing any lists provided on its website. The FSA applies the same approach to risk assessment and risk management across the UK and will manage its communication in the same proportionate and considered manner, co-ordinating communications across all UK countries to ensure that there is uniformity of approach.

During a non-routine incident a plan for communications including identification and mapping of stakeholders will be established as part of the IMCG remit with strategic input from SIOG.

6.2 TACTICAL COMMUNICATION OPTIONS

The Incident Management and Co-ordination Group may decide to invoke various communication mechanisms depending on the nature scope and scale of the incident – these are as follows (Standard Operating Procedures exist for the functions listed below).

Briefing Cell

Depending on the scale and nature of the incident and the amount of briefing required (press enquiries, briefing demands, ministerial interest etc., it may be appropriate to set up a dedicated briefing cell. This ensures that information collation, the development of the situation report (SIT REP), and work to develop standard lines to take, Q and A's and other briefing documents, is given proper priority. The IMCG, with advice from the Incident Manager, will appoint a lead for the briefing cell.

The briefing cell plays a vital role in the FSA's incident response. The work done by the cell can be much in demand and can quickly become a limiting step if not properly resourced. Leadership and membership of the cell should rotate on a regular basis to avoid incident fatigue. IMCG will ensure that the cell is adequately resourced.

Bird Table Meetings

The IMCG may decide to call a bird table meeting or set up a regular series of bird table meetings as part of the battle rhythm. The purpose of the bird table meeting is to facilitate effective incident management by ensuring regular proactive communication between all major stakeholders and partners. The bird table Standard Operating Procedure sets out the strict rules that apply to these meetings to make sure they meet their rapid update function. If more in-depth discussion is required on an issue, then the use of another forum, such as a stakeholder liaison meeting, would be more appropriate.

Stakeholder Liaison Meetings

The IMCG may decide to call a stakeholder liaison meeting. This may be a one off or they may be held as part of battle rhythm. The stakeholder meeting should have aims distinct from the bird table meeting. These may be linked to solving a particular technical issue – for example, getting a range of industry views on a defined issue, or obtaining a greater understanding of consumer concerns. Operational teams working most closely to an issue may identify membership and the aims of the meeting.

When the meetings are held with industry, reference to Chatham House rules may be considered and if teleconference facility is offered, care should be taken to ensure the identity of all callers is known.

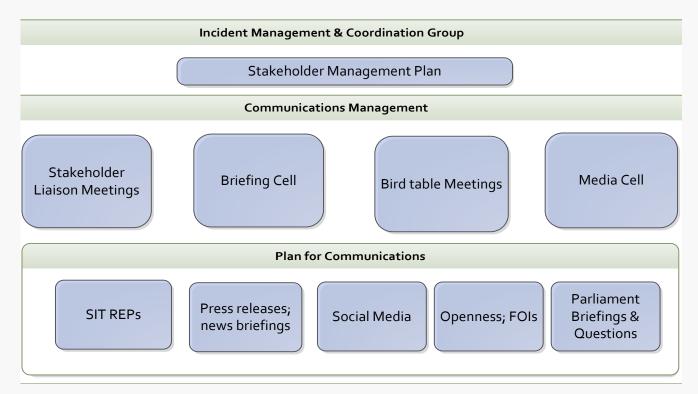
Media Cell

A media cell may be set up to ensure the co-ordination of lines of communication across organisations such as OGDs, FSS. These would be attended by communications colleagues who would be expected to represent the FSA lines to take. FSA communications may also be required to attend communication cells organised by the Lead Government Department when the FSA is not in the lead.

Stakeholder Management Plan

The stakeholder management plan is used to determine FSA stakeholder engagement during an incident. The plan helps determine communication requirements for individual stakeholders and identifies areas of mutual interest. The Stakeholder management plan is an Incidents and Resilience Teams document that helps determine stakeholder engagement in peace time and during incidents.

Tactical Communication Strategies - The below diagram sets out characteristics of the tactical communications strategies.



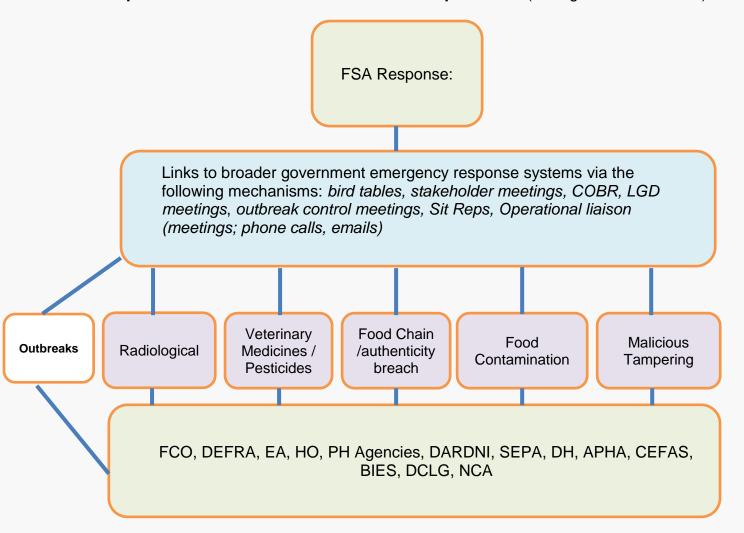
6.4 LINKING TO OTHER GOVERNMENT DEPARTMENTS AND AGENCIES

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

In the event of a non-routine food or feed related incident, there will be a need to involve other Government departments or agencies as appropriate. The nature and scale of the incident will determine which organisations need to be involved and in what capacity. Often, another Government department will lead on specific incidents, for example the Department of Health and Public Health England will lead on the public health impacts of foodborne illness outbreaks in England (similar Departments will lead for the Devolved Administrations in their territories). In these instances, the FSA command and control structure will be set up to inform the OGD's response and to cover FSA's the areas of responsibility – FSA escalation should reflect their Lead government responsibilities in dealing with food contamination during a foodborne outbreak.

The IMCG, in liaison with the Incident Manager, will consider options for communication including hosting meetings with relevant Government officials across the UK, setting up bird table meetings or arranging exchange of information through sharing of incident Situation Reports. The Stakeholder Management Plan contains further details.

FSA Response in relation to Other Government Departments (Listing is not exhaustive)



6.5. LINKING TO ENFORCEMENT

Consideration of enforcement action required will be carried out as part of the FSA command and control processes. The below diagram shows the FSA links to enforcement partners. The list of enforcement partners shown is not exhaustive.

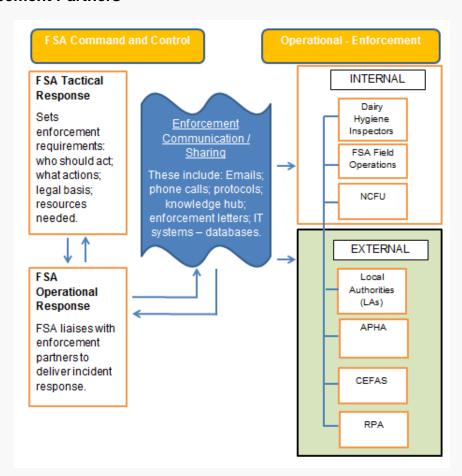
The FSA works with Local Authorities (LAs) through statutory codes of practice. Expectations for enforcement by LAs are communicated by various mechanisms. Plans for broad enforcement controls, such as sampling plans and advice to business, may be decided at FSA strategic or tactical levels and funding considered. The decision on taking legal action against a business will need to be made at LA level but often in close liaison with the FSA. During a FSA Major incident, the LAs may enact their local emergency procedures (via their own Local Resilience Forums) setting up their own strategic co-ordination mechanisms, which the FSA may be invited to attend.

The FSA has direct control over enforcement actions taken by Dairy Hygiene Inspectors and Meat Hygiene Teams. In certain circumstances, the FSA Field Operations Rapid Response Team (FORRT) may be deployed to assist with some areas of meat hygiene enforcement. The FSA's National Food Crime Unit (NFCU) may also be involved as it works with partners to protect consumers from food and drink that is either unsafe or not authentic because of serious

criminal activity. The NFCU works alongside the Incidents Unit as part of the Consumer Protection Division.

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

FSA Enforcement Partners



6.6 INTERNATIONAL LINKS

The FSA liaises with the EU Commission on Crisis Management and the need for Member States to respond to Emergencies as set out in EU legislation (Article 5 178/2002; Article 13 of 882/2004 and Council Decision 2004/478/EC – General Plan for Food & Feed Crisis Management).

The FSA is the national contact point for the European Commission's Rapid Alert System for Food and Feed (RASFF), and it uses the system to exchange information on measures taken to address serious risks detected in relation to food and feed.

This system is also used to inform Member States, the European Commission and originating third countries of incidents or outbreaks caused by a food and/or feed whose distribution is beyond the UK's national borders.

The FSA is also the national contact point for INFOSAN (International Food Safety Authorities Network) for communication between national food safety authorities regarding urgent events.

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

7. Incident Review and Planning

7.1 INCIDENT REVIEW

A review process, including root cause analysis methodology, will take place for those non-routine incidents were lessons have been identified.

The FSA's Emergency Preparedness Resilience & Response Board (EPRRB) has oversight responsibility for making sure the FSA identifies lessons from incident review and emergency exercises to ensure FSA capability in this respect is maintained. It delegates functions relating to incident review planning to the Incident Review Sub-Group (IRSG). Joint reviews may be undertaken with partner organisations.

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

Review type	Mechanism
Hot wash up or Hot debrief	One week after the incident or period of duty if incident is protracted with responders (at each location). Informal meetings or questionnaires
Organisational debrief (cold debrief)	Within eight months post incident. Workshop, meeting or questionnaire
Multi-agency debrief (cold debrief)	Within four to six weeks post- incident where there has been multi- agency involvement. Workshop, meeting or questionnaire.
Third party post-incident report	For protracted or high impact incidents, the FSA may commission a third party post-incident report. These will be supported by terms of reference and output will be in the form of a report with recommendations.

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

Debrief reports are submitted to the EPRRB or the IRSG.

7.2 EXERCISE PLANNING

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

The FSA exercise programme has two basic aims:

- To exercise the FSA Incident Management Plan annually to ensure its fitness for purpose,
- To involve FSA staff in emergency exercises as part of maintaining a capable cadre of staff trained to take on incident roles and maintain FSA competency in this area.

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

Glossary

APHA Animal Health and Plant Health Agency

BAU Business as Usual

BEIS Business Energy and Industrial Strategy
CCGNI Civil Contingencies Group Northern Ireland

CCS Civil Contingencies Secretariat

Cefas Centre for Environment, Fisheries and Aquaculture Science

CMG Crisis Management Group
CPD Consumer Protection Division
COBR Cabinet Office Briefing Room

CONOPs Cabinet Office Concept of Operations
CRIP Common Recognised Information Picture

DA Devolved Administration

DARDNI Department of Agriculture and Rural Development Northern Ireland

DCLG Department of Communities and Local Government

Defra Department for Environment and Rural Affairs

DH Department of Health EA Environment Agency

ECCW Emergency Co-ordination Centre Wales

EPRRB Emergency Preparedness Response and Resilience Board

FCO Foreign and Commonwealth Office

FFIMG Food and Feed Incident Management Group FORRT FSA Field Officer Rapid Response Team

FSA Food Standards Agency

FSAE Food Standards Agency England

FSANI Food Standards Agency Northern Ireland

FSAW Food Standards Agency Wales

FSS Food Standards Scotland

HO Home Office

IMP Incident Management Plan

INFOSAN International Food Safety Authorities Network IMCG Incident Management & Co-ordination Group

ISR Incident Situation Report

LA Local Authority

LGD Lead Government Department

NCA National Crime Agency
NCC News Co-ordination Centre
NFCU National Food Crime Unit

NGOs Non-Government Organisations

OGDs Other Government Departs

PHE Public Health England

RASFF Rapid Alert System for Food and Feed

RPA Rural Payments Agency

SAGE Scientific Advisory Group for Emergencies SEPA Scottish Environment Protection Agency SGoRR Scottish Government Resilience Room

SID Strategic Incident Director

SIOG Strategic Incident Oversight Group

SIT REP Situational Report

SOP Standard Operating Procedures

STAC Scientific and Technical Advisory Cells

VC Video Conference

WRF Welsh Government Resilience Forum

Annex A – List of Standard Operating Procedures and Guidance that supports the Incident Management Plan

Bird Table Meetings

Briefing Cell

Chemical Incidents

Communications (External and Internal)

Food Alert (Issuing a...)

Foodborne Outbreaks

Food Supplement Incidents

Incident Escalation Assessment

Incidents Hotline

Incident Response

Meeting Secretariat

Microbiological Routine Incidents

On-farm Incidents

Operational Cascade Briefings

Physical Contamination Incidents

Shellfish Incidents

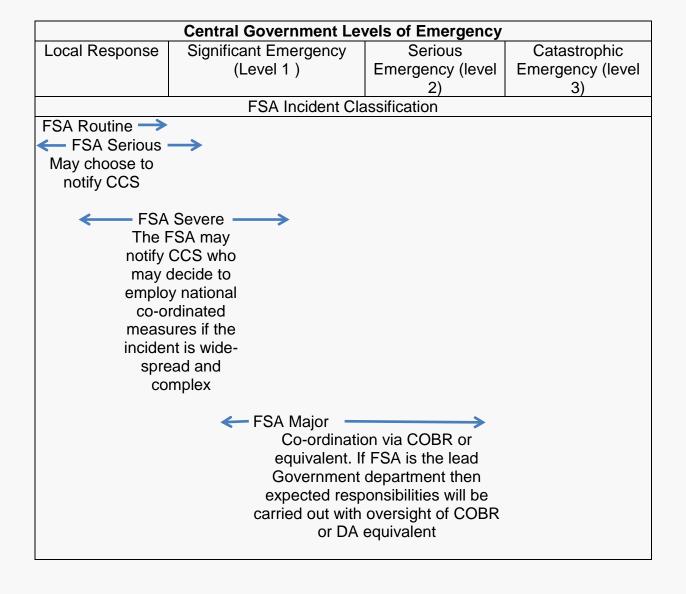
Strategic Incident Oversight Group (SIOG)

Stakeholder Liaison Meetings

Incident Management & Coordination Group (IMCG)

Roles and Responsibilities

Annex B - Central Government Emergency Levels compared with FSA Levels



Annex C - Which FSA Office leads?

The table below shows which FSA Office leads for routine, serious or severe incidents depending on the geographical area affected.

The FSA / Food Standards Scotland arrangements are also detailed below.

Scenario	National scale – National Impact		Devolved Authorities – National Impact		Devolved Authorities – No National Impact	
Routine	FSA England (FSAE) Incident Team Lead – input from DAs		Case by Case decision FSAE Incidents Team or DA lead		DA Leads and Notifies other countries notified.	
Serious	Tactical Lead FSAE – input from DAs		Tactical lead FSAE - input from DAs		Tactical Lead DA – other countries input	
Severe	FSAE Lead – input from DAs		FSAE Lea from DAs	ad – input	Case by C decision of whether F DA lead	on
	Strategic	Tactical	Strategic	Tactical	Strategic	Tactical
	FSAE lead DA input	FSAE lead DA input	FSAE lead DA input	FSAE lead DA input	FSAE & DA	DA – FSAE input

Arrangements with Food Standards Scotland

The Food Standards Scotland Incident Management Plan, defining how incidents contained within Scotland are managed, can be found at http://www.foodstandards.gov.scot/business-and-industry/safety-and-regulation/food-incidents/incident-management-plan.

Where the scope of an incident does not extend beyond England, Wales or Northern Ireland, the incident will be managed by FSA and information about such incidents shared with FSS.

Where the scope of an incident does not extend beyond Scotland, the incident will be managed by FSS and information about such incidents shared with FSA.

When an incident escalates from a FSA or FSS incident to a UK-wide incident, FSA will manage the incident, although in some cases, it may be managed by FSS by mutual agreement

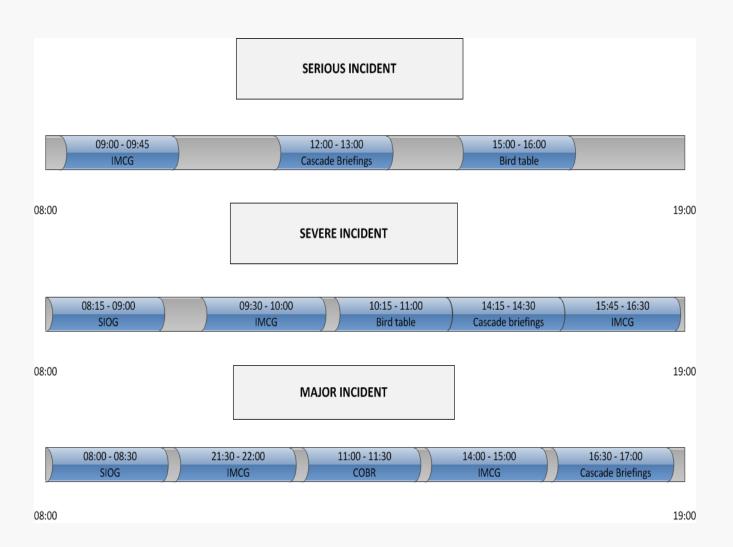
Annex D – Six Strategic Questions

The Strategic Incident Oversight Group (SIOG) sets overall FSA strategy for the response to incidents classified as Severe and above. The SIOG asks the following six strategic questions to help set that strategy.

- 1. What are the facts and impacts?
- 2. What's our strategic intent?
- 3. What tasks need to be done to achieve the intent?
- 4. What's our main effort now?
- 5. What resources and co-ordination are needed?
- 6. Who needs to know what and when?

Annex E - Battle Rhythm

Battle rhythm is the daily routine of events (briefings, teleconferences, meetings etc.) at set times that are designed to flow from one to another thereby providing a sense of continuity and familiarity to the handling of an incident. The battle rhythm sets out the sequence of events preceding meetings and the processes that follow meetings at the tactical and strategic levels. Although the battle rhythm is usually set early in an incident, it can change as the incident develops. It should be noted that when COBR or its equivalents are convened, the battle rhythm should take account of the requirement to submit information for the Common Recognised Information Picture (CRIP), two hours before COBR or its equivalent meet. The procedures to be followed when COBR or its equivalents are invoked are contained in the Cabinet Office Concept of Operations and will be available to SIOG members as necessary. Examples of a Battle Rhythm are shown below The Battle Rhythm should take into account meetings held by FSS as part of their command and control structure.



Annex F – UK Government Response – Description of Main Structures and Arrangements across the Devolved Authorities.

Cabinet Office Briefing Rooms or COBR, may be activated by the Cabinet Office Civil Contingencies Secretariat in order to facilitate rapid co-ordination of the central Government response and effective decision making. Where COBR has been activated and there are food safety issues, the Parliamentary Under-Secretary of State for Public Health will normally represent the FSA at Ministerial level COBR meetings and the FSA Chief Executive or designated deputy will brief the Minister in advance of that meeting. The FSA will also seek an invitation for the FSA Chairman/Chairlady to attend Ministerial meetings.

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

How COBR operates varies depending on the nature of the incident. Non-terrorist related emergencies are normally led by the Civil Contingencies Secretariat. The FSA is listed by the Cabinet Office as the **government department responsible for planning, response and recovery for food contamination emergencies** in all four UK countries. In England, this responsibility is shared with Department of Health. Where FSA is considered the Lead Government Department, the expectation is that FSA will have a presence at both COBR and COBR Officials meetings and equivalences in the Devolved Administrations. There may be also occasions where another Department takes the lead and FSA presence is required to support the cross-Government response.

Terrorist related incidents are led by the Home Office with support from the police – this will include incidents where food is involved or implicated although FSA expertise will be required to support the response. For terrorist events taking place in Scotland, Wales or Northern Ireland, then the Secretary of State for Scotland, Wales or Northern Ireland will attend any resulting meeting of COBR.

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

A key role for the Lead Government Department is, in partnership with the Cabinet Office, to create and update a Common Recognised Information Picture (CRIP) for discussion at COBR. The FSA will be responsible for producing Incident Situation Reports which Cabinet Office will use to formulate its CRIPs. The **Incident Situation Reports SOP** contains the template showing the required format for the Incident Situation Reports.

Once the FSA is involved in a central Government led response there are a number of coordination groups and functions which may require FSA participation. The level of FSA engagement in COBR will be a subject for discussion at SIOG. A summary is given below of

some of the main cross-government strategic coordination groups and functions, where FSA participation may be required.

Scientific Advisory Group for Emergencies (SAGE) – Chaired by the Government Chief Scientist and/or the Chief Medical Officer. SAGE can be activated by COBR in the event of a Cabinet Office classified emergency. It is responsible for co-ordination of scientific and technical advice in order to inform decision making during an emergency response. It also provides a peer review mechanism. The decision to activate SAGE sits with the lead Government Department or the Government Chief Scientist. Where food is implicated, the FSA will be represented at SAGE normally by the FSA Chief Scientific Advisor or a nominated deputy. SAGE science guidance for an emergency impacting on food and/or feed is available and held by GO Science.

The Scientific and Technical Advisory Cells (STACs) provide advice to local responders to deal with the local consequences of an incident and manage local recovery efforts. Where food and/or feed safety is a potential issue FSA will attend STAC meetings. The FSA attendee would normally be a senior expert from the 'lead' division. The Department for Communities and Local Government (DCLG) Resilience and Emergencies Division (RED) will provide the FSA with dial in details for STAC meetings in the event of a local response to an emergency.

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

Other groups, functions and roles that may be relevant to the FSA during a Central Coordinated Government Response are described in the Cabinet Office **Concept of Operations** (CONOPs).

LIAISON BETWEEN COBR AND THE DEVOLVED ADMINISTRATIONS

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

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

Scotland

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

Food Standards Scotland Non-Routine Incident Management Plan provides more detail on the Scottish response to a Major Incident.

Wales

In Wales, the Emergency Co-ordination Centre Wales (ECCW) engages with COBR and is set up by Welsh Government with FSA Wales providing input, depending on the nature of the emergency. The Welsh Government Resilience Forum (WRF) promotes good communication and the enhancement of emergency planning across agencies and services in Wales by providing a forum for Chief Officers to discuss with Welsh Ministers strategic issues of emergency preparedness.

Northern Ireland

In Northern Ireland, the Crisis Management Group (CMG) is a Ministerial led strategic coordination group responsible for setting the overall strategy for the NI Administration's response to a level 2 or level 3 emergency as defined by Cabinet Office (see **Annex B**). The Civil Contingencies Group NI (CCGNI) is the public service strategic emergency planning policy review and development group. The CCGNI in its role in emergency preparedness supports the CMG and co-ordinates strategy when Ministerial involvement isn't required. FSA in NI is represented on the CCGNI, and the Food and Feed Incident Management Group (FFIMG) is a subgroup of CCGNI.

Annex G - FSA Communications Planning

In any food incident, there are various communications areas that need to be addressed. Communications include: internal FSA, wider Government and communications across the Devolved Administrations. Other communications strategies are required for consumers, industry and enforcement partners. This Annex sets out how the FSA will develop its communications approach with the various stakeholders. A **Communications (External and Internal) Standard Operating Procedure** provides two checklists for communications: 1) an action checklist and 2) a checklist of stakeholders to communicate with

Consumers

When an incident is considered serious and the risk posed immediate, the FSA will publish a news story in the first instance and proactively engage the public through the media, including social media. The intention would be to reach a large number of consumers rapidly and to give context and further explanation of the risk.

The FSA will also consider informing the public about an ongoing incident the cause of which is at the time unknown but which the FSA, sometimes in conjunction with other bodies, is investigating. A good example of this might be an outbreak of food poisoning spread over several weeks or months where there is a spike in cases linked to a common strain of pathogen. Often, the actual source takes time to investigate and even establishing a link to food can be difficult to prove. However, information should be given to the public about the outbreak and what government agencies are doing to discover the cause.

Although the FSA remains of the view that it is *preferable* to give consumers specific information that they can act on, it may not be possible to give specific information, especially during an ongoing outbreak, and it is clearly unhelpful to give information which later turns out to be wrong.

The FSA aims to tell consumers the facts about an ongoing incident, even if sometimes it is not able to identify specific products or recommend specific actions.

The FSA will be open and factual in its communications about the potential risk, the products affected and the advice given. The FSA will state what actions the Food Business Operator involved have taken/are taking (e.g. to remove the product from sale) and advice if they have the affected product or have already consumed it.

Alongside our traditional media routes such as news stories, our social media channels will also be a primary means of communication. We will post regular updates in the tone appropriate for each channel and respond to questions quickly and accurately.

Although probably not possible in the first hours of an incident, we will consider proactive social media outreach from senior voices during ongoing incidents, such as tweet chats or longer blog posts which could offer background and reassurance to consumers.

Industry - businesses/trade bodies

Many incidents will require close collaboration with the industry on communications.

We will work with companies on steps they are taking to highlight a recall, such as placing advertisements in local news or displaying point of sale notices.

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

The FSA will always show news stories to relevant companies in advance of publication. All information sent to companies before going into the public domain is supplied to confirm factual accuracy. The FSA will be prepared to consider new information or additional comments if they are relevant, but will retain full editorial control.

The FSA will consider sharing its internal Q&As on request with companies, local authorities and other relevant bodies involved in an incident. It will, however, not disclose information which could prejudice current or future investigations.

FSA staff and FSA Board

We will use our internal communications channels (Foodweb and Yammer) to ensure we proactively keep staff informed of developments in major incidents. This can be supplemented in special circumstances by email cascades to staff and, in exceptional circumstances, text messages to mobile phones. We will provide updates to the FSA Board via the weekly circulation, or in daily email updates if necessary.