

ANNEX C: PROGRESS TOWARDS COMPLETION OF DELOITTE INCIDENT MANAGEMENT REPORT RECOMMENDATIONS

FSS’s state of incident preparedness was assessed by Deloitte against ten principles and 24 recommendations for improvement were outlined in their Incident Preparedness Review Report.

Table A1 below provides a brief update on the progress with each recommendation of the Deloitte Incident Review Report

A guide to **progress**, as assessed by FSS officials, is provided against each recommendation in a graphical format representing five indicative progress categories as follows:







FSS’s Senior Management Team has assessed the importance of delivering each of the recommendations and has allocated a High, Medium or low **priority** as follows:



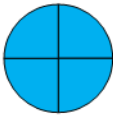



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Table A1



Progress category	Recommendation	Priority	Forecast completion date(s)	Progress towards completion
Principle 1	Framework, Plan & Procedures.	<i>Incident Management requires known procedures and tools that appropriately support an organisations response</i>		
	<p>Recommendation 1: Further develop FSS' incident management processes and structures to align more with the structure and size of the new organisation. Once complete, develop a framework which clearly describes FSS' incident management processes, principles, definitions and structures, and signposts the relevant SOPs in order to make the response workflow easier to follow</p>		End March 2018	<p>A new Incident Management documentation set consisting of an Incident Framework, Policy and Plan has been developed.</p> <p>The Framework clearly outlines our approach to incident management, the structures & teams which will be established to manage an incident and an overview of how these teams will operate in different classification.</p>
	<p>Recommendation 2: Review and revise the NRIMP to include more detailed guidance on the:</p> <ul style="list-style-type: none"> • Incident categories and the response each level requires • Risk assessment and risk management processes and roles and responsibilities of those involved • Protocols for responding when FSS is not the lead organisation • Information management and exchange process 		Q1 FY 2018/2019	<ul style="list-style-type: none"> • New Level 1 - 4 Incident Classifications have been devised with clear expectations of what response structures (IAT, OIT, SIT) will be established for each level. • The Risk assessment process has been designed, based on a concept of pre-determined Risk Assessments being available to expedite the process. Work is continuing with FPSS and SFCIU to agree the situations where pre-determined Risk

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	<ul style="list-style-type: none"> Stakeholder management process Shift handover process <p>Tools, templates and SOPs should be included where possible to support the responders and make the process more user friendly. Each process should be clearly documented and well understood by the relevant staff.</p>			<p>assessments are suitable.</p> <ul style="list-style-type: none"> Stakeholder management process is to be outlined in Crisis Communications Plan.
	<p>Recommendation 3: Develop a clearly defined workflow to support FSS' response to 'routine' incidents and how this links into the NRIMP. This will enable a clearer pathway from day to day 'routine' incident management and 'non-routine' incident management via clear assessment and escalation.</p>		End March 2018	Level 1 Escalation process on pg 21 Section 3.3 outlines this.
	<p>Recommendation 4: Consider creating a 'Facilitator' (or Chief of Staff) role to support the incident management process and 'drive' the team process. Experience shows that such roles are very useful in teams that respond on a regular basis and are required to manage</p>		Complete	This role has been incorporated in the OIT/SIT team structures to be established during non-routine incidents .



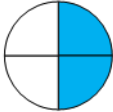

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	<p>complex information and situations. This role would become a permanent member of the operational team, and is responsible for ensuring the plan and procedures are being used throughout the response, and ensuring discipline and good practice is being adhered to throughout the response. For example, this could include: informing response team members of the times of upcoming meetings; managing the running of meetings (e.g. monitoring attendance, duration and making sure the agenda is followed), and; ensuring meetings actions are circulated following each meeting.</p>			



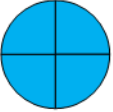

Principle 2 Governance		<i>Effective incident management is enabled by good governance and clear accountability, with active assurance driving performance.</i>		
	<p>Recommendation 5: Develop an incident response policy, which clearly outlines accountabilities – leadership, ownership and management, reporting lines, budgets, training and exercising requirements and suitable assurance processes to allow ongoing assessment and continuous improvement.</p>		<p>End March 2018</p>	<p>Being developed and contained within Incident Management Framework.</p>

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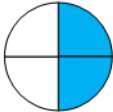

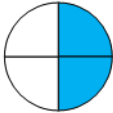

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	The policy should also align with any mandated requirements as a regulatory body or as laid down by Scottish Government			

Principle 3	Response Organisation	<i>Effective incident management requires a clearly-defined structure and authorities</i>		
	Recommendation 6: Review the incident management teams' membership, roles and responsibilities documented and update, to ensure the teams are appropriately resourced and all roles are represented on the teams in line with good practice. Each role should have clear responsibilities and appropriate training requirements to ensure that the responder is aware and understands expectations of the role, and is capable of fulfilling it		Complete	Outlined in Incident Management Framework
	Recommendation 7: Clearly define the broader, supporting roles of branch teams – assisting the response but not necessarily performing a core role - to ensure there is no confusion over their role and remit during an incident and their importance to the response. Consider including incident management-related		Q2 FY 18/19	Core roles cards have been developed to clarify what is expected of staff assuming these responsibilities. All Staff Training is scheduled for w/c 19 th March, with a Desktop Exercise taking place on 23 rd March. SMT considering the development of an





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	objectives to relevant employee's annual objectives.			incident management objective for all staff into 2018/19 Objectives.
Principle 4 <i>Assessment & Escalation</i>		<i>Incident management requires effective assessment and escalation all levels supported by clearly defined triggers, authorities and systems to deliver a fast and effective response</i>		
	<p>Recommendation 8: Establish an 'Incident Assessment Team' as part of the escalation process, which consists of a small group of people who can rapidly form to triage a potential incident and determine whether the NRIMP is invoked. This will enable more rapid classification of the incident and appropriate response.</p>		Complete	Outlined in Incident Management Framework
	<p>Recommendation 9: Expand on the existing incident classification matrix to clarify the key trigger points for when the NRIMP is invoked. Review the terminology used to classify incidents and clearly outline the required FSS response for each level of incident, ensuring reputational risk is incorporated into the matrix</p>		Complete	Outlined in Incident Management Framework & reputational risk has been incorporated in the Incident Classification Matrix.

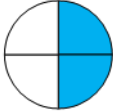

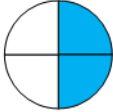

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Principle 5	Information Management & Situational awareness	<i>Good decision making based on clear and well managed information.</i>		
	Recommendation 10: Refine/Redevelop a clearly defined incident management process, defining roles and outputs, and include in the incident management framework		Complete	Outlined in the Incident Management framework.
	Recommendation 11: Identify a dedicated pool of employees who can form the 'Secretariat Support Staff' as outlined in Annex A of the NRIMP. This team should include roles such as a Log Keeper and Information Manager. Develop specific role checklists for each member of the Secretariat Support Staff outlining their responsibilities and include these in the NRIMP		End March 2018	Core roles cards have been developed to clarify what is expected of staff assuming these responsibilities & identification of suitable employees has begun.
Principle 6	Stakeholders	<i>Incident management requires a good understanding of the parties who may be impacted or influential depending on the situation.</i>		
	Recommendation 12: Further develop the stakeholder identification and engagement process and document this in the Crisis Communication Plan. This should include an overview of FSS' potential stakeholders during an incident		End March 2018	A key stakeholder checklist and a description of roles and responsibilities in terms of contacting and managing stakeholders is detailed in the FSS Incident Communications





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	and a clear description of the roles and responsibilities involved i.e. the Comms Manager is responsible for coordinating the process during an incident and maintaining the stakeholder matrix; the Briefing Manager is responsible for contacting industry stakeholders etc			Plan.
	<p>Recommendation 13: Work with Scottish Government to hold a review of FSS' powers in relation to working with local authorities and other statutory bodies during an incident – particularly in cases where there may be a requirement for FSS to be more involved due to its level of experience of managing large- scale and national incidents</p>		End of May 2018 for discussion with SG but if legislation is required (quite possible) difficult to predict a completion date.	Some discussion already held informally with SG on the need to review current situation, but more formal discussion to take place once the Board have agreed the recommendations.
	<p>Recommendation 14: Review the process for working with partner organisations where FSS is not the lead organisation. For example, if responding to a health-led incident, consider how the FSS response should work to make the response as effective and efficient as possible.</p>		End of March 2018	<p>The Incident Management Framework outlines how incidents are managed when FSS is not the lead organisation.</p> <p>Separately, FSS are members of a Scottish Health Protection Network (SHPN) Working Group, developing <i>Supplementary Guidance on the investigation and control of outbreaks of foodborne illness in Scotland</i>, which clarifies the specific roles of FSS, Local</p>

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				Authorities, Public Analyst Labs, Health Protection Scotland etc during a foodborne outbreak which is led by HPS.
Principle 7	Communication	<i>Incident management requires an ability to communicate effectively, to appropriate audiences, in a timely manner.</i>		
	<p>Recommendation 15: Develop an internal communications process for the Communications Team during an incident and include in the Crisis Communications Plan. Include an alert on the checklist for the Head of Communications to ensure internal communication takes place during the early phases of an incident and identify the role responsible for this task.</p>		End March 2018	The principles, processes and mechanisms for internal communication are detailed in the Incidents Communication Plan.
	<p>Recommendation 16: Document the incident communication response in an updated Crisis Communications Plan which outlines the role and responsibilities of the team during an incident. This plan should contain role checklists and other tools and templates, such as holding statements, Q&As and fact sheets, to support the team's response.</p>		End March 2018	A full and detailed Incident Communications Plan has been developed and training on its guiding principles as well as the tactical checklists and tools for the Communications team and OIT and SIT members has been arranged.

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	<p>Recommendation 17: Develop a guidance note on what information can and cannot be communicated to the public during an incident. While data protection is paramount during any response involving people, FSS should work with HPS to understand how this situation can be avoided in the future.</p>		End March 2018	<p>This guidance forms an integral component of the new FSS Incident Communications Plan.</p> <p>Meetings between Head of Communications at FSS and HPS, as well as broader FSS/HPS bilateral meetings have been undertaken to discuss this point, as it is recognised that FSS can only have full control of communications flow in an Incident where FSS have sole lead.</p> <p>Meeting with the new FSA Director of Comms and Head of External Comms being arranged between FSS DCEO and Head of Comms.</p> <p>This was raised at the SHPN WG and FSS comms teams to agree text in MPHI supplementary guidance. Issue of % certainty also been raised.</p>
	<p>Recommendation 18: Utilise existing expertise available within FSS to carry out specific tasks, such as developing the ministerial briefings, rather than taking on too much activity on the SMT. This will free the team up to focus on the strategic response</p>		End of March 2018	<p>The re-allocation of Tactical and operational tasks to the Operational Incident Team (OIT) allows the Strategic Incident Team (SIT) to focus on the strategic response.</p> <p>The Ministerial Briefing process is also</p>

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				captured within the Incident communications plan.

Principle 8	Capability	<i>Incident management requires trained, skilled and experienced professionals to fulfil specific responsibilities.</i>		
	<p>Recommendation 19: Conduct Training Needs Analysis (TNA) for each member of the Operational and Strategic teams. As part of this process, it would be useful to:</p> <ul style="list-style-type: none"> • Develop a competency framework which identifies the skills, knowledge, authority and experience required to assume the roles outlined in the incident management framework • Consider who in FSS could assume each role (primary and deputy) • Conduct TNA for each role within the Operational and Strategic team and, if further training is required, this should be noted and a training plan developed • Any remaining gaps should be escalated to the SMT and a discussion to take place whether it is prepared to accept this risk 		Q2 FY 2018/2019	Initial consideration of the skills required to undertake some key roles was undertaken with Deloitte in Q3 FY 17/18 but further development is required independently by FSS.

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	Recommendation 20: Train response staff in the refined incident response processes, responsibilities and activities to raise awareness. Ensure training is role-specific and held regularly. Ensure new joiners receive adequate training. To build live incident experience, consider bringing in less experienced staff to observe incidents and how they are managed.		End March 2018	Staff training on the new Incident Management Framework, Policy and Plan is scheduled for w/c 19 th March with a Desktop exercise scheduled for 23 March 2018.
	Recommendation 21: Undertake succession planning to identify suitable candidates to support the competency and availability of incident management experts within FSS and build a sustainable workforce.		Q1 FY 18/19	Recognition that a succession planning exercise is required.
Principle 9	<i>Culture and Discipline</i>	<i>Effective incident response supports teams through learning, training and exercising to build competency and capability. It should include a highly disciplined team who understand and follow due processes appropriately deliver effective and timely response.</i>		
	Recommendation 22: Establish a regular programme of training and exercising which includes an annual assessment, to ensure capability is being maintained at the desired levels and in line with the policy.		End of March 2018	Agreement that new Incident Management processes need to be rehearsed in FY 18/19 which will be considered within Brexit, Diet & Nutrition, Regulatory Strategy Programmes and ECA.

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Principle 10	Resources and Facilities	<i>Incident management requires sufficient, appropriate and pre- defined resources and facilities to support the response.</i>		
	<p>Recommendation 23: Develop a contingency plan with the Corporate Leadership Team, to enable resource capacity in the event of a severe incident to establish adequate staffing throughout the response. Instruct staff to maintain up-to-date diaries to enable HR to know who is available to support when an incident arises</p>		Q1 FY 18/19	This needs to be considered as part of the Business Planning & Programme prioritisation process by branch heads.
	<p>Recommendation 24: Work with the relevant organisations to develop a contingency plan in the event reference laboratories become overloaded and are unable to meet demand</p>		31 March 2020	This is contingent on the resilience of official control food microbiology services which are currently provided through Local Authority funded Public Analyst food examiner services and as such are outwith FSS's direct control. FSS has been engaging with the Shared Scientific Services project which aims to protect and strengthen existing LA laboratories and has highlighted the need to ensure future contingency with regard to laboratory provision with Scottish Government Health. FSS is also collaborating

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				through the Scottish Health Protection Network (SHPN) on the development of a Public Health Microbiology Strategy for Scotland, which aims to strengthen existing infrastructure for the investigation of infectious diseases, including those caused by foodborne pathogens. This strategy aims to strengthen reference microbiology services through the roll out of whole genome sequencing and improved collaboration and co-ordination between clinical and food testing laboratories in Scotland.