

Incident Procedure

Introduction

This procedure describes the system in place designed to manage incidents and enable the withdrawal and recall of products wherever it may be required.

An incident is defined as an event or occurrence and for the purposes of this procedure an incident is an event or occurrence that has the potential to effect food safety, legality, authenticity or quality. Such incidents must be managed to minimise the likelihood of consumers having a negative experience.

Incidents, and potential emergency situations, to be considered include:

1. Disruption to services such as water, energy, transport, temperature control, staff and communications
2. Fires, floods and natural disasters
3. Malicious damage or sabotage
4. Failure of or attacks against digital cyber security

Consideration will always be given to the need for withdrawal or recall and an incident will always take priority. This procedure will be capable of being operated at any time and will always be available to the Incident Management Team should they need to refer to it.

Incident Management Team

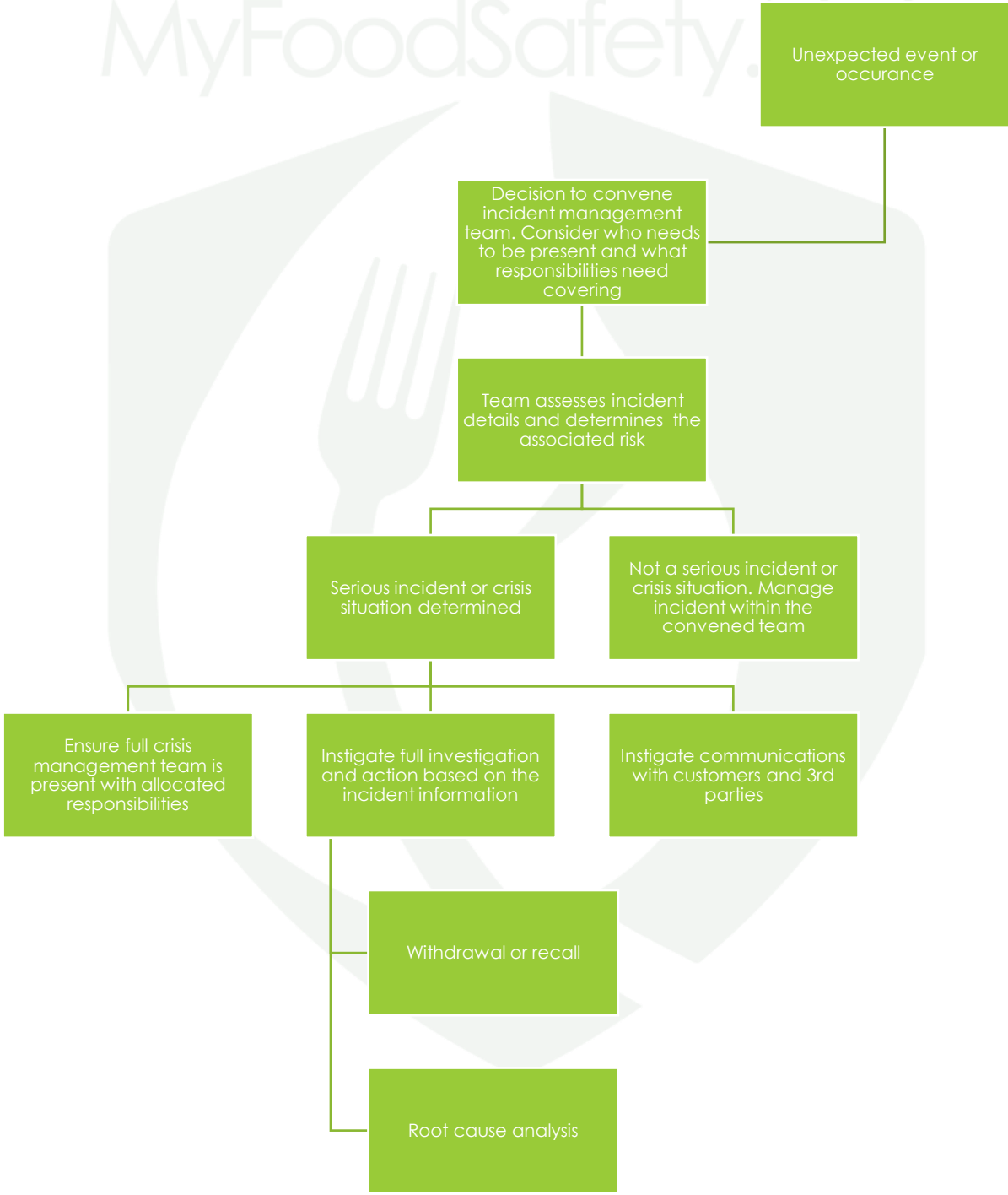
In the event of an incident the incident management team will be consulted. The members present to review an incident will depend on the incidents severity and the subsequent risk associated with it. The full Incident Management Team comprises of:

The team should comprise of the Managing Director and the heads of each function represented in the business. Each function will also have a nominated deputy and other team members listed as appropriate. Responsibilities should also be detailed; such as chairman, secretary, communications and any specific responsibilities according to areas of expertise.

MY FOOD SAFETY.NET INCIDENT PROCEDURE TEMPLATE

Incident Decision Tree

The following points will be used as a basis for the incident decision tree and will be used each time an incident occurs. This will help to plan next steps and develops consistency in the management of incidents. The workings through each step of the decision tree will be documented for future reference.



MY FOOD SAFETY.NET INCIDENT PROCEDURE TEMPLATE

Key Contacts

List all key contacts that may need to be called upon in the event of an incident. Ideally these will be business issued mobile telephone numbers and email addresses and include any additional out of hours information. The full contact list should include the incident management team, emergency services, customers, suppliers, external agencies, certification bodies, and regulatory authorities. Where it is not suitable to provide a full list within this procedure reference must be made to where the contact information can be found.

Also consider data protection and ideally obtain consent for contact information to be recorded and distributed.

Communications

All communications will be made in a timely manner and progressed in accordance with the incident's severity and impact. Where required; customers, consumers and regulatory authorities will be alerted quickly and certification bodies will be alerted within 3 working days. All relevant internal parties will also be kept informed and a communication plan outlined for all.

Traceability

The Incident Management Team will allocate resource to trace the records relating to the incident. A plan for product traceability will be devised and will subsequently result in the location of the affected product(s), reconciliation of quantities and recovery or disposal. Key timings of the traceability will be recorded and kept with the records and root cause analysis will be conducted with plans to implement corrective actions to avoid recurrence.

Root Cause Analysis

Root cause analysis must be used to determine cause so that improvements can be implemented to prevent recurrence of non-conformities. Records of this process will be maintained.

May want to outline here the businesses approach to root cause analysis and provide examples; for example using a **fishbone diagram** and a **5 why** approach to the root cause.

Following this a corrective action plan will be formed to address the root cause; records of which will also be maintained. The plan will be updated with notes on the actions taken and by whom and ideally include evidence to support closure.

Mock Recall

This procedure will be tested annually to ensure it remains robust and effective. All members of the Incident Management Team will be familiar with it and will be involved in the mock recall. All records relating to the test will be retained and will include timings of key activities and any contact checks to ensure full communication is possible. As with an actual incident, the results and root cause will be used to review current procedures and implement any improvements as deemed necessary.

