# Table of Contents

1  About this plan  
   - Objectives and scope  
   - Incident definition  
   - Strategy and priorities  
     
2  Notification of potential incidents  
   - Sources of notifications  
   - Notifications from local authorities  
   - Notifications from businesses, trade bodies and emergency services  
   - Notifications from consumers  

3  OPSS processing of notifications  
   - Initial processing  
   - Assessment of the notification  
   - Determination of lead role  
   - Case Conference  
     
4  Local authority led response  

5  OPSS led response  

6  OPSS command and control arrangements  
   - Figure C – OPSS Command Structures  
   - Groups and committees  
     - Strategic Coordination Group (SCG)  
     - Emergency Response Capabilities and Operations (ERCO)  
     - Tactical Coordination Group (TCG)  
     - Bird table / stand up meetings  
     - Ad-hoc groups  
   - Roles and responsibilities  
     - TCG Functional Teams  
     - TCG Functional (Operational) Teams  
     - Operational Partners  
     - OPSS Incident Management Team (IMT)  
   - Schedule of events  

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2
OPSS Incident Management Plan

Escalation, de-escalation and closure 21

7 Engagement 22
   Strategy 22
   International links 23

8 Incident review 24

9 Readiness for incidents 25
   Plans and operational instructions 25
   Training 25
   Exercises 25
   Surveillance 26

Appendix A: Glossary 27

Appendix B: Example planning assumptions for risk assessment of notifications 28
1 About this plan

1.1 This plan describes how the Office for Product Safety and Standards (OPSS) will manage incidents involving consumer products for which the Department for Business, Energy & Industrial Strategy (BEIS) holds policy responsibility\(^1\), in conjunction with local authorities, government, operational and industry partners.

Objectives and scope

1.2 This plan sets out OPSS’ framework for recognising and responding to a consumer product safety incident. The plan explains the role that all parties involved have in managing incidents to deliver on OPSS’ wider purpose of protecting consumers and building public confidence in the product safety system.

1.3 The objectives of this plan are to:
- highlight the responsibilities and interfaces between OPSS, local authorities\(^2\) and businesses for dealing with incidents;
- ensure there is a coherent, transparent and accountable process for responding to an incident;
- ensure effective mechanisms for escalation are in place;
- ensure robust command and control procedures are in place;
- provide the capability to determine the key parties and resources required to develop and implement an effective response;
- ensure effective engagement across all parties; and
- highlight incident de-escalation and lessons to be learnt processes.

1.4 This plan can be flexibly deployed. In particular, the principles described under command & control could be deployed for emergency responses that OPSS may be called to undertake, for example when handling non-consumer product safety incidents or as part of a multi-agency response.

Incident definition

1.5 OPSS defines a consumer product safety incident as:

\[
\text{an event, where, based on the information available, the effectiveness of the OPSS response is likely to have a significant impact on the risk to the safety or confidence of consumers, industry and/or Ministers.}
\]
Strategy and priorities

1.6 The OPSS Strategy 2018-2020 commits us to providing additional capacity to the United Kingdom (UK) product safety system, including supporting our regulatory partners in the local authorities to enable them to focus their own limited resources upon activities that maximise the strength of local enforcement.

1.7 To optimise this commitment, this plan provides details for how OPSS will classify potential incidents, so Government and local authorities are clear as to their respective roles in addressing a product safety case.

1.8 The plan recognises that where the lead responsibility for managing an incident is held by local authorities, they will have their own emergency response protocols to follow, including incident management plans, for managing unsafe products. OPSS may still have a significant supporting role in a local authority led response, for example by providing access to testing or specialist technical expertise.

1.9 Businesses play a key role in protecting people from harm and are responsible for ensuring consumer products they make, import, distribute or sell in the UK are safe for consumers to use and following the legal requirements in relation to labelling. Products should only be sold if their compliance with product safety regulations has been demonstrated appropriately. OPSS have published advice for businesses on .GOV.UK.

1.10 Businesses could face action if a product is found to be unsafe or causes harm to consumers, including legal action. As such, businesses need to monitor the safety of their products and act promptly if a potential safety issue arises. OPSS have backed the Code of Practice - Publicly Available Specification 7100 (PAS 7100) to help businesses plan for and deal with product safety issues. PAS 7100 also covers best practice on how regulators can effectively monitor incidents.

1.11 Business preparedness, in line with PAS 7100, supports incident management plans held by local authorities and OPSS as illustrated in Figure A.

1.12 In the event of a consumer product safety incident requiring intervention, OPSS will act swiftly and decisively, in partnership with industry, regulatory partners, operational partners and other stakeholders to:

- protect the public and property;
- make the best use of scientific and technical evidence, product testing, incident data, risk analysis and intelligence in decision making;
- use the full range of tools and powers to manage the incident in a proportionate, fair and accountable manner; and
- restore public confidence.
Figure A – Interrelationship between incident management plans
2 Notification of potential incidents

Sources of notifications

2.1 Notifications of potential product safety incidents originate from a range of internal OPSS and external sources, as shown below.

![Diagram showing sources of notifications]

2.2 While an incident response will typically be triggered by a notification, it is also possible for the trigger to be a discovery during routine business activity, such as analysis of gathered intelligence or market surveillance. Other triggers could include a product being identified by an official investigation as the cause of an emergency (e.g. fire) or where an OPSS is already handling an incident and activities reveal further triggers.

Notifications from local authorities

2.3 Local authorities are a key source of information about potential incidents. If they become aware that a product on the market poses a serious risk or is incompatible with the general safety requirement under the General Product Safety Regulations 2005 as preserved in UK law, they must immediately notify the Secretary of State who has delegated responsibility to the OPSS. If the product is in any other way non-compliant with the relevant product specific legislation, they should notify OPSS as soon as practicable.

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3 General Product Safety Regulations 2005

5. General Product Safety Regulation

1. No producer shall place a product on the market unless the product is a safe product.
2. No producer shall offer or agree to place a product on the market or expose or possess a product for placing on the market unless the product is a safe product.
3. No producer shall offer or agree to supply a product or expose or possess a product for supply unless the product is a safe product.
4. No producer shall supply a product unless the product is a safe product.
2.4 Local authorities should use the Product safety database for notifications. Notifications should include sufficient information to identify:

- the seriousness of the risk;
- the producer, importer or distributor in the UK;
- the product in question;
- test results of the product;
- any risk assessment undertaken; and
- the details of action taken to prevent risk to the consumer.

2.5 Once entered, local authorities should assign the case to OPSS.

2.6 Questions about use of the database should be addressed to opss.enquiries@beis.gov.uk.

2.7 Should the database be unavailable, local authorities should email opss.enquiries@beis.gov.uk with the subject line “Urgent: Serious risk”.

**Notifications from businesses, trade bodies and emergency services**

2.8 Notifications should be directed in the first instance to the local authority or primary authority.

2.9 The local or primary authority will triage the case and if appropriate, notify OPSS.

**Notifications from consumers**

2.10 Notifications should be directed in the first instance to the Citizens Advice service who in turn will liaise with local authorities as appropriate.
3 OPSS processing of notifications

Initial processing
3.1 Notifications that have been incorrectly routed to OPSS will be forwarded to the appropriate contact points.

3.2 Notifications logged on the Product safety database are used for monitoring and intelligence purposes to create a more informed and accurate picture of product safety risk.

3.3 Notifications are routed to the Incident Management Team (IMT), who provide a single point of contact and coordination of incident activities.

3.4 IMT will undertake a review of the information supplied, liaising with the originator and others as appropriate, to ensure the information supplied is sufficient to commence an assessment.

Assessment of the notification
3.5 IMT will co-ordinate with relevant experts to assess the potential impact of a notification and consider if and how it should be managed.

3.6 Checks against existing data held on the Product safety database will form part of the assessment process. Product test results and intelligence analysis will also inform future OPSS product surveillance activities.

3.7 Consumers, businesses, trade associations and the relevant primary authority or local authority may be contacted to obtain more information.

3.8 The following is a non-exhaustive list of indicators that may be considered to assess the potential severity, scale and impact of a notification:
   a) Harm severity (the type and severity of the harm that could be caused by the product)
   b) Number of consumers that are, or could be, affected (e.g. number of products in households)
   c) Usage of product (e.g. frequency of use, foreseeable use, unforeseeable use)
   d) Impact on vulnerable consumer groups
   e) Product failure history
   f) Complexity of action needed to reduce risk (remedial action)
   g) Consumer concerns and perceptions
   h) Political and media interest
   i) Impact on wider industry.

3.9 Appendix B provides example planning assumptions for the risk assessment of notifications.

3.10 The assessment and any required information gathering could require surveillance of the situation over a period of time.
3.11 Following the assessment, OPSS will determine if intervention is required. If none is required, interested parties will be informed.

**Determination of lead role**

3.12 Where intervention is required, OPSS will determine who should initially lead a response.

3.13 To ensure that Government and local authorities focus their resources and are clear as to their respective roles, OPSS identifies three criteria to delineate OPSS and local authority led activity. This means that the OPSS will generally lead in tackling risk on those cases that are:

- **Nationally Significant** – resourcing and expertise needed to investigate is beyond the capacity of a local authority, there is a high level of public concern and national interest; and/or
- **Novel** – the risks of the usage of a product are unknown and unquantified; and/or
- **Contentious** – instances in which a single, centrally delivered answer is required to minimise the potential for dispute between industry, regulator and other stakeholders.

3.14 Where these criteria are not met, the case will generally be led by the local authority.

3.15 This approach includes flexibility on a case by case basis to determine who is best placed to lead with appropriate support from the other party. The decision will take into consideration whether the business has an effective primary authority partner that could potentially lead, or if no primary authority is in place, whether there is a suitable local authority with the capacity to lead the required regulatory response.

3.16 In assessing the capacity of the local authority to lead, OPSS will have regard to the number of businesses that need to act; for example, where several businesses need to coordinate their messages to consumers, it may be more appropriate for OPSS to lead the incident response even in the absence of nationally significant, novel or contentious issues.

3.17 Figure B provides an outline process map for how OPSS will handle notifications of potential incidents and subsequent actions.

**Case Conference**

3.18 Throughout the evaluation processes, OPSS may hold a series of case conferences.

3.19 A case conference is a decision-making forum for determining next steps. They take place when:

- an initial investigation has concluded with a recommendation on enforcement action with potentially significant impacts on the business and/or OPSS or wider population (e.g. legal, business continuity, multi/national company).
- grounds exist to suggest that the current case could become an incident.
- significant impact on budget (outside thresholds).
• when recommended by the OPSS Grade 6 enforcement lead, a deputy director or higher.

3.20 Depending on the circumstances, there may be one or a series of case conferences to discuss emerging issues. Each case conference will consider the background to the case, updates of investigations and testing (if applicable), Science and Technical Advice, Intelligence, communications and to agree next steps.

3.21 The likely outcome of a case conference may be to:
• undertake further action (enforcement action/further testing/intel etc);
• declare an incident (and set up associated teams); or
• record and take no further action.
Figure B - Incident management process map

OPSS receives notification

Processing team assign notification to the Incident Management Team

Incident Management Team review information for completeness

Incident Management Team co-ordinate assessment

Is intervention required?

Who will initially lead response?

Local authority leads response

OPSS monitor activities

Has the response ended?

Yes

End

End

No

Does the lead remain appropriate?

Incident Management Team inform interested parties

End

Has the response ended?

Yes

End

No

OPSS leads response

OPSS monitor activities

Has the response ended?

Yes

End

No

Does the lead remain appropriate?
4 Local authority led response

4.1 Where it has been determined that a response will be led by a local authority, OPSS will:

- inform the local authority of the decision and agree whether any scientific and technical support and/or testing from OPSS would be beneficial;
- inform other local authorities and market surveillance authorities of the case via the Product safety database. Should the database be unavailable, local authorities will receive information via email;
- liaise with the local authority to ensure support is provided;
- request regular updates from the local authority to monitor the progress of the corrective action (if appropriate); and
- evaluate progress to determine if the most appropriate lead is in place, escalating or de-escalating as appropriate.
5 **OPSS led response**

5.1 Where it is decided that OPSS will lead the response, OPSS will:

- inform the local authority of the decision and that OPSS will be contacting the business;
- inform other local authorities and market surveillance authorities of the case via the Product safety database. Should the database be unavailable, local authorities will receive information via email;
- work closely with the local authority(s) as part of a coordinated effort;
- conduct appropriate operational activities;
- work with the local authority(s) as appropriate;
- keep the local authority(s) informed of progress; and
- evaluate progress to determine if the most appropriate lead is in place, escalating or de-escalating as appropriate.

5.2 Where corrective actions and product recalls are an appropriate response, OPSS will use the General Product Safety Regulations 2005, the Regulation on Accreditation and Market Surveillance (765/2008), product sector specific regulations and PAS 7100 to manage these, ensuring coherence and consistency.

5.3 OPSS will co-ordinate its response as described in section 6 onwards.
### 6 OPSS command and control arrangements

#### 6.1 In response to an incident, OPSS will identify the most appropriate lead and decision makers for the assessed risk level, as illustrated in the following table.

<table>
<thead>
<tr>
<th>Risk level</th>
<th>Description</th>
<th>Incident lead</th>
<th>Who decides escalation / classification?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Medium</td>
<td>An incident which cannot be dealt with via business-as-usual resources and procedures, and requires decision making and resource allocation to be made at a higher level. May require the input of external partners, e.g. National Trading Standards, trade representative bodies, British Retail Consortium, London Fire Brigade, other external stakeholders.</td>
<td>OPSS Tactical Coordination Group (TCG) Chair of the TCG Appointed incident manager</td>
<td>Medium to High: TCG, chair of TCG, appointed incident manager</td>
</tr>
<tr>
<td>High</td>
<td>An incident which requires strategic level input and support, potentially through significant cross-government cooperation and coordination. They usually require an enduring response and resource reallocation.</td>
<td>Strategic Coordination Group (SCG) Strategic incident director (SID) Tactical leads: TCG, chair of TCG, appointed incident manager</td>
<td>High to Critical: SCG, strategic incident director (SID)</td>
</tr>
<tr>
<td>Critical</td>
<td>Require a central government coordinated response. OPSS assumes various responsibilities, and BEIS might act as the lead government Department. The incident may involve COBR.</td>
<td>BEIS Emergency Response Team (ERT) BEIS Gold/Strategic Incident Director (SID) COBR, with the SCG and TCG feeding in as for severe</td>
<td>The decision to activate COBR will be taken by the Cabinet Office CCS, in conjunction with BEIS and No. 10. Once activated, CCS is responsible for running the COBR mechanism to co-ordinate the cross-government in support of the lead government department.</td>
</tr>
</tbody>
</table>
6.2 OPSS will establish three levels of command operating at a strategic, tactical or operational level as shown in Figure C.

6.3 Flexibility and proportionality of the response is important. For smaller incidents, it may not be necessary to establish all the structures described below, however most of the activities and functions delivered through the response structures will still need to be delivered.

**Figure C – OPSS Command Structures**

Groups and committees

**Strategic Coordination Group (SCG)**

6.4 The SCG when initiated, will be constituted with a Strategic Incident Director (SID). This is usually the OPSS CEO (or deputy) or BEIS Gold (the senior civil servant acting as gold commander for the incident) appointed.

6.5 The SCG is an OPSS body, while the Emergency Response Team (ERT) will have cross-BEIS membership and is likely to be constituted only when there are cross-sector impacts. The objective of the SCG/ERT is to set the overall strategy for the response. In doing so they will consider:

- What has happened (facts and impacts)?
- The strategic aim
- What tasks are needed to achieve our aim?
- What are the immediate priorities?
• What support is required to deliver the priorities (resources, information, authority, finance)?
• Who needs to know what and when through the creation of a stakeholder engagement plan?
• Planning the exit strategy.

6.6 Throughout an incident response, the SCG or ERT will liaise with counterparts in BEIS, other government departments, local authorities and industry as necessary to gather situational awareness and respond effectively to the incident. The SCG or ERT will set clear deadlines for updates, which must be met by partners.

Emergency Response Capabilities and Operations (ERCO)

6.7 ERCO was established within BEIS to improve the way the Department coordinates its preparation for and response to emergencies.

6.8 For the purposes of incident response, OPSS will engage with ERCO in the case of an incident that is, or could develop to be, risk assessed as High or Critical. If ERCO establishes an ERT, OPSS will provide policy advice, links to industry and ensure that subsequent implications are considered.

6.9 The ERT works within central government response mechanisms, potentially as the Lead Government Department (LGD).

6.10 OPSS, on advice from ERCO, will decide when to notify the Cabinet Office Civil Contingencies Secretariat (CCS) of an incident of concern. CCS in liaison with the Lead Government Department (LGD) will decide whether an emergency requires a coordinated by central government response. CCS, the LGC and No.10 may choose to activate Cabinet Office Briefing Rooms (COBR) to facilitate decision making and allow rapid execution of the coordinated central government response.

Tactical Coordination Group (TCG)

6.11 The TCG manages and coordinates the response at a tactical level through the application of the strategy set by the SCG.

6.12 It will usually be chaired by the deputy director responsible for the OPSS Incident Management Team (IMT) providing advice and guidance to the SCG and guidance and instruction to operational teams.

6.13 The TCG will decide the schedule of events, review risk assessments and agree management strategies, agree an engagement strategy, confirm financial resources and consider staff resources.

6.14 An incident manager will be appointed by the TCG and is accountable to the TCG Chair. The incident manager will usually be either the Head of the IMT or OPSS’ Product Safety Enforcement Team and is responsible for incident classification and management, providing assurance that OPSS, local authorities and businesses are taking necessary actions.

6.15 In the event of a protracted incident, it may be necessary to remain in response mode for an extended period. The incident manager will lead the establishment of a succession plan to ensure continuity of capability.
6.16 Relevant Functional Team Leaders (FTLs) will sit on the TCG and are accountable to the TCG chair. FTLs are responsible for specific areas of OPSS' incident response and will be expected to attend TCG and other related meetings. FTLs will hold cascade briefings on a regular basis with their team members, covering relevant output from the TCG and SCG meetings, assigning tasks to the team, agreeing timescales, and setting quality standards.

**Bird table / stand up meetings**

6.17 Bird table meetings are conducted to:

- provide a structure for the management of the incident by meeting regularly;
- facilitate the effective management of the incident by ensuring communication between all policy, operational, and communications functions involved;
- provide brief situation reports on all aspects of the operation to those concerned in its management;
- encourage a coordinated and cooperative response;
- identify key emerging issues and allocate responsibility for resolving them and reporting back.

6.18 Participants will be from all the areas involved in the management of the incident.

6.19 Updates include a strategic overview, short situation reports from each team, including any issues they are coming across and communication of key items from the schedule of events.

**Ad-hoc groups**

6.20 In addition to regular meetings of groups such as the TCG which form an established part of the incident response command and control structure, it may be appropriate to hold ad-hoc expert groups.

6.21 A Product Safety Expert Group will be convened where there is a need to obtain specialist advice or independent verification of OPSS considerations. Attendees will reflect the issues under consideration and may include representatives from OPSS, modelling experts, economists and scientists in the required fields. These may be sourced within government, its agencies or from external organisations such as academia.

6.22 The SCG or TCG may require the creation of a Product Safety Evidence Group. Attendees would be drawn from the main analytical teams in OPSS. The group would ensure coordinated and timely scientific, technical and analytical advice is made available to SCG, TCG, policy and enforcement colleagues and/or others as required.

**Roles and responsibilities**

**TCG Functional Teams**

6.23 Tactical leads may be drawn from the following teams, some or all of which may also have a role in the operational response:

- **Analysis**: evaluates and models product-related data to help drive decision-making and interventions.
• **Borders Policy**: leads policy engagement on borders with government departments, other border agencies and trading standards.

• **Business Engagement**: provides the main point of contact between OPSS and businesses and trade associations.

• **Consumer and Business Insights**: develops mechanisms to understand how consumers, businesses and regulators behave, to develop and evaluate interventions.

• **Intelligence**: provides intelligence-gathering and analytical capability to assist with incident assessment and targeting of resources.

• **Legal Process**: provides expertise on legal process for Primary Authority and Enforcement teams enabling them to carry out regulatory duties in a legally compliant manner. Provides the primary link between OPSS and BEIS legal teams.

• **Local Delivery**: supports implementation and development of Primary Authority and brings together national regulators, local authorities and businesses to address regulatory issues.

• **Policy and Briefing**: provides policy expertise in the relevant legislation and lead on ministerial and parliamentary business.

• **Risk**: provides expert risk advice and reviews of product risk assessments.

• **Scientific and Technical Advice**: provides scientific and technical expertise and ability to commission academic and industry-specific specialist expertise.

• **Stakeholder Engagement**: manages the approach to relationships with key stakeholders.

• **Technical Services**: provides technical services including product regulation testing that underpin operations.

• **Trading Standards Coordination**: leads on engagement with local trading standards in relation to product safety and metrology.

**TCG Functional (Operational) Teams**

• **Borders Operations**: provides coordination of border and ports enforcement activity.

• **Connections**: develops key messages, communicates live issues and delivers engagement tools. Provides the primary link between OPSS and BEIS Press Office.

• **Digital and Technology**: develops new digital systems for use by OPSS, local authorities and other market surveillance authorities to share data and information about product risks and receive rapid alert notifications.

• **Enforcement**: provides capability to conduct investigations and take necessary enforcement action.

• **People and Management Support**: supports and advises on recruitment, training and development, HR and performance management. Provides the primary link between OPSS and BEIS HR functions.
• **Processing**: logs and tracks enquiries and concerns as part of role as OPSS’ key public-facing team.

• **Resource Management**: provides advice for procurement and spend.

**Operational Partners**

6.24 Depending on the nature, scale and severity of an incident, the TCG may include representation from operational partners and other government departments to provide a coordinated response. These may include:

• Home Office
• Cabinet Office, Civil Contingencies Secretariat (CCS)
• Ministry for Housing, Communities and Local Government (MHCLG)
• Health and Safety Executive (HSE)
• Local authority trading standards product safety teams
• Association of Chief Trading Standards Officers (ACTSO)
• Chartered Trading Standards Institute (CTSI)
• Fire services

**OPSS Incident Management Team (IMT)**

6.25 IMT provides a number of functions that support emergencies specifically:

• Secretariat - Undertakes secretariat functions for specific meetings within OPSS and sets the schedule of meetings, including timings, in conjunction with the chair of the TCG.

• Management Information - Collates management information from OPSS and the wider operational teams (trading standards).

• Reporting – collates updates from teams involved to provide management information and reports to OPSS, BEIS and wider government as required.

• Forward planning and horizon scanning.

• Agrees the schedule of meetings including timings.

• Issues resolution - Provides advice and guidance on emergency management and takes forward issues for resolution, ensuring the correct people are involved in solving the issue.

**Schedule of events**

6.26 A schedule of events is established to allow all participants to be aware of the incident activities and meetings, so they can better plan their involvement.

6.27 The schedule will be agreed by the TCG depending on the size and scale of the issues being faced and may change over time. The schedule set out below is indicative. Where events are slow moving a more condensed schedule will be appropriate. The main point is to ensure that a schedule is set and understood by all.
### Time Level Event

<table>
<thead>
<tr>
<th>Time</th>
<th>Level</th>
<th>Event</th>
</tr>
</thead>
<tbody>
<tr>
<td>09:00</td>
<td>Strategic</td>
<td>SCG</td>
</tr>
<tr>
<td>10:00</td>
<td>Tactical</td>
<td>TCG</td>
</tr>
<tr>
<td>12:00</td>
<td>Tactical/Operational</td>
<td>Bird table / Stand up meeting</td>
</tr>
<tr>
<td>14:00</td>
<td>Tactical</td>
<td>Comms Group</td>
</tr>
<tr>
<td>16:00</td>
<td>Strategic/Tactical</td>
<td>Sitrep contributions required</td>
</tr>
<tr>
<td>18:00</td>
<td>Strategic</td>
<td>Sitrep issued</td>
</tr>
<tr>
<td>Ad-Hoc</td>
<td></td>
<td>Product Safety Expert Group</td>
</tr>
<tr>
<td>Ad-Hoc</td>
<td></td>
<td>Product Safety Evidence Group</td>
</tr>
</tbody>
</table>

#### 6.28
The IMT will produce regular situation reports (‘sitreps’) on an agreed template. The TCG will set the frequency for production of the sitreps taking into consideration the reporting needs of wider BEIS and Government response structures.

#### 6.29
If CCS activate COBR, OPSS sitreps will be used to provide specific OPSS information into any Commonly Recognised Information Picture (CRIP). The timings for these contributions will be agreed with CCS.

### Escalation, de-escalation and closure

#### 6.30
The management of an incident at the appropriate level will help to ensure an effective and proportionate response. A decision whether to escalate an incident through the differing response levels will be driven by its severity, scale and impact, and the expectations of OPSS to respond. The IMT lead decides whether to flag an incident for escalation at the appropriate level.

#### 6.31
As an incident draws towards resolution, it may be appropriate to de-escalate to a lower level, or to return completely to routine business. This decision will be taken by the incident manager and the chair of the TCG in consultation with the SCG. Once closed, all OPSS led incidents are subject to incident review as described in section 9 of this plan.
7 Engagement

Strategy

7.1 OPSS will, when appropriate create a stakeholder engagement plan which will ensure we:

- provide local authority trading standards with timely information about our actions, the actions of the businesses involved and what they need to do;
- provide consumers and businesses with appropriate information where they need to act (this includes publishing safety messages on the government’s product recall website);
- work with business(es) and local authorities as appropriate, ensuring safety messages get to the right consumers, including focusing on vulnerable consumers;
- 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;
- notify ERCO in the case of an incident that is, or could develop to be, risk assessed as High or Critical;
- keep other government agencies and the devolved administrations informed where they have a significant interest in the incident; and
- inform BEIS press office at the earliest opportunity and liaise with it throughout for the development and authorisation of key lines. BEIS press office will lead on external communications.

7.2 OPSS has the ability, through procurement of an external call centre service, to quickly scale up its emergency call handling operations to process commensurate levels of consumer enquiries. This will ensure OPSS is able to provide timely and accurate advice and reassurance to consumers.

7.3 Engagement with the business(es) involved in the supply chain of the affected products will be led by OPSS or local authorities depending on operational decisions.

7.4 OPSS will work with appropriate BEIS teams to engage with national consumer groups, trade associations and other national or international agencies, media and other national stakeholders.

7.5 In addition to the meetings which form part of the daily routine for managing incidents, the TCG may decide to call other stakeholder meetings that have their own distinct aims, for example, seeking industry views on a specific technical issue. The TCG will work with the operational team closest to an issue to identify appropriate membership.

7.6 There may be incidents with a product safety element, but where another government department or agency is leading on the overall response. In these instances, OPSS’ incident management plan will be put into place to feed into the overall response, and to cover OPSS’ areas of responsibility.
International links

7.7 The RAPEX (Rapid Exchange of Information System) online system is the EU rapid alert system for dangerous consumer products – with the exception of food, pharmaceutical and medical devices which are covered by other mechanisms. It facilitates the rapid exchange of information between member states and the Commission on measures to prevent or restrict the marketing or use of products posing a serious risk to the health and safety of consumers. The system is built on procedures and guidance for the formal assessment and determination of product safety risks.

7.8 OPSS is the UK’s RAPEX national contact point and is responsible for informing the European Commission about dangerous products, the risks they pose, and preventative measures taken. The European Commission will disseminate this information to the other EU national contact points. In the same way, the UK national contact point will receive information via the European Commission about dangerous products, and if these are present on the UK market, OPSS will take necessary actions including alerting the necessary market surveillance authorities.

7.9 Local authorities and members of the public can access the publicly available information about products on the EU market on the Safety Gate site.

7.10 The UK Product safety database provides alerts to local authorities about products which are unsafe or pose a serious risk on the UK market. Should the database be unavailable, local authorities will receive information via email.
8 Incident review

8.1 A review process will take place for all OPSS led incidents to identify areas for improvement and ‘lessons to be learned’. These will be fed back into the Incident Management Plan to adapt and improve incident response procedures.

8.2 Reviews may involve stakeholders and examine any element of the incident response including detection, notification, assessment, mobilisation, response strategy, response effectiveness, command and control structure, communications/engagement, and stakeholder relations.
9 Readiness for incidents

9.1 The Head of IMT is responsible for ensuring that OPSS is prepared to respond to product safety incidents by ensuring that:

- Suitable plans are in place and exercised;
- Staff are suitably trained;
- Notifications are monitored and emerging trends / risks are highlighted;
- Effective relationships exist with key operational partners; and
- Contingency planning best practice is shared with OPSS teams and local authorities.

Plans and operational instructions

9.2 OPSS will conduct annual reviews of this plan to ensure it remains fit for purpose. These reviews will ensure that the incident assessment and classification process is effective, and that there is a robust command and control structure, with roles and responsibilities correctly assigned. In addition, lessons learned from invocations and feedback received will be reviewed for incorporation into the plan. Feedback on this plan should be sent to opss.enquiries@beis.gov.uk for the attention of “Incident Management”.

9.3 To ensure resources can be made available to invoke and implement this incident management plan, OPSS has identified its critical business activities and planned for the prioritisation of its business as usual activities. Deputies for key personnel have also been identified.

9.4 This incident management plan is supplemented by instructions maintained within the key OPSS teams.

9.5 IMT is working with OPSS teams to ensure a consistent approach is taken when writing, presenting and maintaining operational instructions to maximise familiarity and flexibility of the workforce.

Training

9.6 Functional team leaders are responsible for ensuring staff identified for response roles receive adequate training to enable a rapid deployment into that role.

9.7 IMT will co-ordinate training needs analysis to identify training opportunities across OPSS.

9.8 In addition, staff will be expected to play active roles in the exercising of the incident management plan and associated procedures.

Exercises

9.9 OPSS is developing a programme of coordinated exercises to refine and demonstrate emergency preparedness to deal effectively with product safety incidents. The programme will be designed to ensure all capability can be assessed.
9.10 Each exercise will be evaluated to produce a report. These reports will be used to highlight and promote best practice, lessons identified and to update plans as appropriate.

**Surveillance**

9.11 In addition to passive surveillance carried out through formal notifications from local authorities, OPSS routinely monitor RAPEX as well as publicly available international databases (including, OCED Global portal on product recalls, United States Consumer Product Safety Commission, Health Canada Consumer Product Safety Program, Australian Competition and Consumer Commission, European Commission Safety Gate, etc.) and the media to identify potentially unsafe products that may available on the UK marketplace.

9.12 Where a potentially unsafe products is identified, OPSS will request the relevant local authority follows up with the business to ensure corrective action is being taken and recorded on the appropriate reporting systems.
# Appendix A: Glossary

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Description</th>
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<tbody>
<tr>
<td>ACTSO</td>
<td>Association of Chief Trading Standards Officers</td>
</tr>
<tr>
<td>BEIS</td>
<td>Department for Business, Energy and Industrial Strategy</td>
</tr>
<tr>
<td>CCS</td>
<td>Civil Contingencies Secretariat</td>
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<tr>
<td>CEO</td>
<td>Chief Executive Officer</td>
</tr>
<tr>
<td>COBR</td>
<td>Cabinet Office Briefing Rooms</td>
</tr>
<tr>
<td>CRIP</td>
<td>Common Recognised Information Picture</td>
</tr>
<tr>
<td>CTSI</td>
<td>Chartered Trading Standards Institute</td>
</tr>
<tr>
<td>ERCO</td>
<td>Emergency Response (Capabilities and Operations)</td>
</tr>
<tr>
<td>ERT</td>
<td>Emergency Response Team</td>
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<tr>
<td>EU</td>
<td>European Union</td>
</tr>
<tr>
<td>FTL</td>
<td>Functional Team Leader</td>
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<tr>
<td>HSE</td>
<td>Health and Safety Executive</td>
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<tr>
<td>IMT</td>
<td>Incident Management Team</td>
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<tr>
<td>LGD</td>
<td>Lead Government Department</td>
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<tr>
<td>MHCLG RED</td>
<td>Ministry for Housing, Communities and Local Government Resilience and Emergencies Division</td>
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<tr>
<td>OGD</td>
<td>Other government departments</td>
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<tr>
<td>OPSS</td>
<td>Office for Product Safety and Standards</td>
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<tr>
<td>PAS 7100</td>
<td>Publicly Available Specification 7100 - Code of Practice on Consumer Product Safety Related Recalls and Other Corrective Action</td>
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<tr>
<td>RAPEX</td>
<td>Rapid Exchange of Information System</td>
</tr>
<tr>
<td>SCG</td>
<td>Strategic Coordination Group</td>
</tr>
<tr>
<td>SID</td>
<td>Strategic Incident Director</td>
</tr>
<tr>
<td>Sitrep</td>
<td>Situation report</td>
</tr>
<tr>
<td>TCG</td>
<td>Tactical Coordination Group</td>
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<tr>
<td>UK</td>
<td>United Kingdom</td>
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Appendix B: Example planning assumptions for risk assessment of notifications

Risk assessments provide a tool to identify and quantify the threat posed by a notification to provoke considerations to either accept or mitigate that risk.

The table below provides examples for to help categorise the risk and consider the need for action:

- Critical risk – their potential consequences are such that they must be treated as a high priority by developing strategies to reduce or eliminate the risk.
- High risk – their potential consequences are sufficiently serious to warrant appropriate consideration be given to develop strategies to reduce or eliminate the risk.
- Medium risk – are less significant and should be monitored to ensure that they are being appropriately managed.
- Low risk – may not be significant in their impact so require minimal monitoring and control.

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Low Risk</th>
<th>Medium Risk</th>
<th>High Risk</th>
<th>Critical Risk</th>
</tr>
</thead>
<tbody>
<tr>
<td>Safety of the public</td>
<td>A safety risk to consumers exists, isolated examples of consumer harm may have occurred, but this risk can be mitigated effectively.</td>
<td>High numbers of consumers have experienced moderate harm, or several related cases of more serious harm have occurred, or it is possible that this type/scale of harm may be caused imminently.</td>
<td>A number of consumers have been severely harmed, or it is likely that severe harm to a number of consumers will be caused imminently.</td>
<td>Severe harm to large numbers of consumers has been caused or severe harm to large numbers of consumers is highly likely to be caused imminently.</td>
</tr>
<tr>
<td>Remedial Action (Complexity)</td>
<td>Remedial action is underway and is being well managed by the business overseen by local authority trading standards and/or OPSS.</td>
<td>Urgent remedial action is required that may be complex, require action by multiple businesses or where a business is not conducting the necessary urgent actions.</td>
<td>Urgent remedial action is required that may necessitate action from a large number of businesses. Remedial action to reduce product safety risk impacts on other types of risk.</td>
<td>Urgent cross-government action required to make the necessary remedial action effective in reducing the risk.</td>
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</tbody>
</table>
## OPSS Incident Management Plan

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Low Risk</th>
<th>Medium Risk</th>
<th>High Risk</th>
<th>Critical Risk</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Consumer Confidence</strong></td>
<td>Short-term or small numbers of consumers concerned requiring investigation and a brief statement of reassurance.</td>
<td>Heightened loss of confidence in consumer product requiring specific investigation.</td>
<td>Significant national loss of confidence in aspects of product safety requiring coordinated investigations and defensive briefings and statements.</td>
<td>Widespread loss of public/industry/international confidence in product safety and/or the integrity of the UK supply chain.</td>
</tr>
<tr>
<td><strong>Media Interest</strong></td>
<td>None or short-lived interest requiring brief statement.</td>
<td>Increasing interest requiring coordinated briefings and statements.</td>
<td>Prolonged interest requiring significant media monitoring and frequent briefings and statements.</td>
<td>Sustained national and/or international interest requiring UK-government-level statements.</td>
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</tbody>
</table>