

# Audit of the Operational Delivery Division

Official Veterinarian (OV) and Meat Hygiene  
Inspector (MHI) Training

December 2021 – January 2022

Report issued: April 2022



## Foreword

Audits of Food Standards Scotland's Operational Delivery team are part of the arrangements to improve consumer protection and confidence in relation to food and feed.

The audit scope was detailed in the audit brief and plan issued to Operational Delivery on the 24 November 2021. The aim of the audit is to maintain and improve consumer protection and confidence by ensuring that Operational Delivery are providing an effective food law enforcement service.

Food Standards Scotland audits assess conformance against retained Regulation (EU) 2017/625 of the European Parliament and of the Council of 15 March 2017 on official controls and other official activities performed to ensure the application of food and feed law and the FSS Manual for Official Controls. The provisions for conducting audits are provided for in Article 6 of retained Regulation (EU) 2017/625.

The Audit scheme also provides the opportunity to identify and disseminate good practice and provide information to inform Food Standards Scotland policy on food safety, standards and feeding stuffs.

Specifically, this audit aimed to establish:

- Verification that official controls are carried out in compliance with planned arrangements.
- Verification that planned arrangements are applied effectively.
- Verification that planned arrangements are suitable to achieve the objectives of official controls.

Following the audit, it is expected that for any recommended points for action, Operational Delivery will prepare and implement an action plan which will incorporate a root cause analysis of any non-compliance. A list of recommendations is provided in the action plan template at the end of this report.

# Table of Contents

1.0	Introduction.....	4
2.0	Executive Summary.....	5
3.0	Audit Findings.....	7
	<b>Retained Regulation (EU) No 2017/625 of the European Parliament and of the Council on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules as amended.....</b>	<b>7</b>
3.2	Article 5. General obligations concerning the competent authorities and the organic control authorities.....	7
3.3	Article 18. Specific rules on official controls and for action taken by the competent authorities in relation to the production of products of animal origin intended for human consumption .....	13
3.4	Annex II. Training of staff of the competent authorities.....	14
	<b>Regulation (EU) No 2019/624 concerning specific rules for the performance of official controls on the production of meat.....</b>	<b>14</b>
3.5	Article 1. Subject matter and scope.....	14
3.6	Article 13. Specific minimum requirements for the official veterinarian, the official auxiliary (MHI) and the staff designated by the competent authority...	15
3.7	Annex II, Chapter I. Specific minimum requirements for the official veterinarian.....	15
3.8	Annex II, Chapter II. Specific minimum requirements for the official auxiliary (MHI).....	16
4.0	Annex A – Action Plan.....	18
5.0	Acknowledgements.....	23

## 1.0 Introduction

- 1.1 This report records the outcomes of the audit of Food Standards Scotland's (FSS) Operational Delivery Division, with regard to their delivery of Official Veterinarian (OV) and Meat Hygiene Inspector (MHI) Training.
- 1.2 The overarching criteria which detail the standards that the assessment has been made against are contained within the relevant sections of [retained Regulation \(EU\) No 2017/625](#) and [retained Commission Implementing Regulation \(EU\) 2019/624](#).
- 1.3 The guidance relating to the current planned arrangements and referred to throughout this report will be the primary policy implementation and procedural references within:
  - **Chapter 10 of the [FSS's Manual for Official Controls](#)**, referred to as the SMOC and the associated [Action Notes](#)
- 1.4 OV and MHI training procedures are run in parallel, sharing similarities in various areas but operate separately. In view of this, the audit was divided into two parts to capture the different procedures and specific legal requirements for the OV and MHI roles. The OV part was conducted in December 2021 and the MHI part in January 2022.
- 1.5 This was a virtual audit due to Covid-19 restrictions. It consisted of a desktop exercise of reviewing all evidence provided, and nine interviews between Operations Field Staff and Managers. Five of these interviews were part of the OV element of the audit, and four of the MHI part.
- 1.6 The audit focused on the arrangements for meeting certain operational criteria, particularly guidance, procedures, records and monitoring interventions.

### **Reason for the Audit**

- 1.7 As detailed in the Foreword, Article 6 of retained Regulation (EU) 2017/625 requires Competent Authorities to carry out internal audits or have audits carried out on themselves.
- 1.8 The audit programme covering the official controls delivered by FSS is carried out as an internal audit by FSS's Audit Assurance Division. This audit forms part of that audit programme.

### **Scope of the Audit**

- 1.9 With the current, and future, constraints in place as a result of Covid-19 restrictions, it was agreed that the audit scope would cover:

- An assessment of policies, plans and procedures for compliance with relevant legislation.
- The verification of application of, and adherence to, documented policies, plans and procedures in training delivery.
- An assessment of the arrangements, methods and systems in place whereby training and competency records are maintained, monitored and reviewed.
- An assessment of the capacity and capability of those delivering the training.
- The identification and dissemination of good practice.
- The provision of information to aid future FSS policy and operational development.

## 2.0 Executive Summary

### Procedures and Arrangements

- 2.1 The control and delivery of staff training lies within the Operational Delivery Division. However, there are significant differences between OV and MHI training procedures, and the overall management coordination and structure. Based on this, the audit was conducted in two separate stages (OV and MHI).
- 2.2 The auditors were made aware of ongoing work taking place on the development of a new OV training proposal; this proposal will be reflected within the recommendations made in the OV part of this audit report.
- 2.3 As a common factor for both parts of the audit, there is a need to develop and implement a clear Learning and Development strategy. This should provide strategic direction, but must also be linked to staff personal development based on levels of competence, performance and training needs.
- 2.4 There are a total of 15 recommendations made in this report, nine specific to the OV part, five to the MHI part, and one common to both parts of the audit.
- 2.5 Planned arrangements are in place for both OV and MHI training, but they do not reflect current legislation that was implemented post-2019. Specifically, and most significantly, the SMOC has not been updated in accordance with Regulation (EU) 2017/625 and 2019/624.
- 2.6 The training material received by Novice Official Veterinarians (NOVs) and Trainee Meat Hygiene Inspectors (TMHIs) was found suitable in terms of content to perform the official controls activities stated in legislation. In particular, the MHI training course was deemed to be robust and well implemented by the auditors.
- 2.7 This report will refer to NOVs when describing the procedures assessed under the previous OV training delivery model and TOVs when acknowledging the recent changes.

- 2.8 The probationary period for a NOV (under the previous model), was not found to be compliant with all the requirements of retained Regulation (EU) 2019/624, in particular, with reference to visits to holdings and the need to work supervised by OVs, during the period before starting to work independently. The procedures to assess competencies of NOV's during this probationary period were inconsistent and weak. The auditors consider the procedures would benefit from further review to address these issues and acknowledge the new TOV programme should address these concerns.
- 2.9 There was no evidence of procedures to ensure the assessment of the competency of MHI's returning to field work after a period of non-service, and MHI's working in unfamiliar areas, being established.
- 2.10 Areas of good practices were identified in the MHI part of the audit as noted in the report.

**Level of Assurance**

- 2.11 As detailed in the FSS's Official Feed and Food Controls Delivery Audit Charter (FSS/ENF/18/001), the audit has been assigned as below:
- 2.12 The Recommendations within this report detail the weaknesses in the controls that the Operational Delivery Division should address.

<p><b>Limited Assurance</b></p> <p><b>Controls are developing but weak.</b></p>	<p>There are weaknesses in the current risk, governance and/or control procedures that either do, or could, affect the delivery of any related objectives. Exposure to the weaknesses identified is moderate and being mitigated.</p>
---	---

**Audit Opinions**

- 2.13 The rating above is based upon four categories of audit assurance level that is applied in relation to individual reports.

<p><b>Substantial Assurance</b></p> <p><b>Controls are robust and well managed</b></p>	<p>Risk, governance and control procedures are effective in supporting the delivery of any related objectives. Any exposure to potential weakness is low and the materiality of any consequent risk is negligible</p>
--	---

<p><b>Reasonable Assurance</b></p> <p><b>Controls are adequate but require improvement</b></p>	<p>Some improvements are required to enhance the adequacy and effectiveness of procedures. There are weaknesses in the risk, governance and/or control procedures in place but not of a significant nature.</p>
<p><b>Limited Assurance</b></p> <p><b>Controls are developing but weak</b></p>	<p>There are weaknesses in the current risk, governance and/or control procedures that either do, or could, affect the delivery of any related objectives. Exposure to the weaknesses identified is moderate and being mitigated.</p>
<p><b>Insufficient Assurance</b></p> <p><b>Controls are not acceptable and have notable weaknesses</b></p>	<p>There are significant weaknesses in the current risk, governance and/or control procedures, to the extent that the delivery of objectives is at risk. Exposure to the weaknesses identified is sizeable and requires urgent mitigating action</p>

## 3.0 Audit Findings

- 3.1 The findings reported below detail both corrective and preventive actions which are not confined to addressing specific technical requirements, but also include system-wide measures. Conclusions address the compliance with the planned arrangements, the effectiveness of their implementation and the suitability of the planned arrangements to achieve the stated objectives as appropriate.

**Retained Regulation (EU) No 2017/625 of the European Parliament and of the Council on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules as amended.**

- 3.2 Article 5. General obligations concerning the competent authorities and the organic control authorities

Article	Audit Findings
1 (a, b)	<p><b><u>OV PART.</u></b></p> <p>For the purpose of this audit, the planned arrangements presented and cross-checked are given in Chapter 10 of the SMOC. The content of this chapter was found to be out of date with references to repealed EC Regulation (Regulation No 854/2004), and there was no evidence that current legislative requirements in retained regulation 2017/625 and 2019/624 are embedded within these written arrangements. Action Note 2020/08/02 was provided; this covers changes in the hours spent in each type of establishment by NOVs, during their probationary period.</p> <p>In general, the content of Chapter 10, specifically the sections referring to NOV supervision and the probationary period, were found to be incomplete. They do not provide the assurance needed during the practical part of OV training. Further guidance as to the Supervisory Official Veterinarian (SOV) role is given in the SOV job description document. However, clear guidance on how relevant tasks of SOVs are planned and delivered is required.</p> <p>Interviews and evidence provided indicated that procedures described in these planned arrangements have not consistently been followed. In one case, the recommended period between the NOV course and the assessment was greatly exceeded, also the learning logs forms used by NOVs differed, with no document control evidenced.</p> <p>The learning logs used to capture and describe the material covered by NOVs in each establishment could improve from further review to include sections for Lead OVs to record comments and notes. In particular, by allowing the Lead OV to record more effectively the progress of a NOV.</p> <p>Full delivery of the OV course (in relation to the scope of the Audit) was made by two providers: the University of Bristol School of Veterinary Science, and the mixed course: FSS/University of Glasgow, School of Veterinary Medicine. The theoretical material covered in both courses was compliant with the minimum requirements stated in retained Regulation (EU) 2019/624. In the case of the University of Bristol School of Veterinary Science course, there was no evidence of FSS obtaining the external validation of this course, or having carried out verification exercises of the content of the course, for instance on emerging official controls issues, or particular Scottish legislative requirements. Interviews indicated that these points were cascaded during the NOV probationary period, although this was not supported by records and documentation.</p>



	<p>It is acknowledged by the auditors that the current arrangements are a combination of the existing written arrangements and those in development, which embed the new requirements of the above (EU) Regulations. The auditors were briefed by the Operational Delivery Division on the future proposal regarding OV training, including an in-house Scottish Qualifications Authority (SQA) accredited course, and changes in the procedures related to the TOV probationary period. The effort and resources devoted by FSS towards these forthcoming arrangements indicated potential positive developments in this area in the future.</p> <p><b><u>MHI PART.</u></b></p> <p>The planned arrangements included in the SMOC do not describe the arrangements for the training of MHIs, other than those referred to in the “Unannounced Inspection” section. Further documentation was provided in relation to the Royal Society for Public Health (RSPH) Level 4 course, though it was not considered as planned arrangements by the auditors per se, but only the content and delivery method of the current MHI training course.</p> <p>Nevertheless, it was noted that the existing arrangements for the delivery of the MHI training course are robust and are fully implemented throughout all the operational areas.</p> <p>MHI Assessors obtain a NVQ (National Vocational Qualification) Level 3 qualification and receive continuous support and monitoring from the Service Level Agreement (SLA) partner (the Food Standards Agency (FSA)). There are arrangements in place for the external assurance on the delivery of the course and the Assessor’s performance through audits by RSPH and the SLA. There was also evidence of continuous communication between the SLA’s representative, Assessors and Trainees. An area for suggested improvement highlighted to the auditors was the defective condition of some laptops provided to Trainees.</p> <p>There was no evidence of procedures being established to ensure that the assessments of the competencies for MHIs returning to fieldwork after a period of non-service, and MHIs working in unfamiliar areas, are undertaken.</p>
1 (e)	<p><b><u>OV PART.</u></b></p> <p>The auditors were informed that post-Brexit changes have had a severe impact on OV recruitment, with requirements to service new emerging official controls tasks and the diversification of the OV role. However, there was evidence that the current strategy is sufficiently robust to ensure adequate OV capacity is maintained. FSS is aiming to recruit and train</p>

two new OVs in each of the three operational areas per year. In addition, Private (locum) Veterinarian Surgeons (PVSs) (authorised as OVs), are being incorporated into the structure to cover remote and low throughput establishments. There was no evidence of any service failure during the period audited.

However, there could be areas of concern regarding the provision of experienced OVs who do not have robust support structures in place to provide NOVs with the level of supervision required in the plant environment.

The auditors were made aware that up to nine NOVs were trained and supervised at the same time by the same SOV in one of the operational areas. This might have resulted in insufficient levels of NOV supervision and additional workload to this SOV to conduct these tasks. This issue raised concerns with regards to the level of expertise of these NOVs at the time of being deployed and working with limited supervision. In the case of one of these NOVs, the period of time between the completion of the OV course and deployment as a NOV was 18 months. In such a situation, there is a risk of reputational damage to FSS by deploying an inexperienced NOV without a robust support structure in place, particularly in highly complex establishments, and when the induction training could be compromised due to rota demands.

The auditors acknowledge the significant progress made by FSS in improving the number of qualified OV staff in the past two years. In September 2019 when FSS took over direct management, 75% of OV staff were NOVs and by January 2022, this figure had reduced to 10%, the main reason for this was because more OVs have undergone the (Bristol) OV course, becoming NOVs.

#### **MHI PART.**

Arrangements to maintain the capacity of MHIs were found to be robust, with provisions to train two new MHIs in each area per year. In addition, OVs can be diverted into MHI positions if needed in exceptional circumstances. There was no evidence of any service failure during the period audited.

2	<p><b><u>OV and MHI PARTS.</u></b></p> <p>There was insufficient evidence of robust procedures to ensure OV conflict of interest disclosure. There was reassurance through Senior Management that these checks are conducted, however, this was not consistently supported by records and evidence gathered through the interviews. This has not been raised as a recommendation as the main scope of this audit was to assess training procedures. The auditors are aware that the governance of conflict of interest procedures lies within Human Resources as Scottish Government policy. As evidenced, a conflict of interest was taken into consideration within one of the MHI training courses audited, where a Trainee was assigned a different Assessor due to an identified conflict of interest.</p> <p>The authorisation process for both OVs and MHIs was found to be documented and robust. Processes for all members of staff interviewed were adequately followed. Authorisations presented as evidence were up to date and related to tasks for which the appointment was made.</p>
4(a)	<p><b><u>OV PART.</u></b></p> <p>There were issues identified regarding the levels of supervision and communication during the NOV practical probationary period. Evidence was presented in relation to communication from SOVs to NOVs, to arrange meetings and to allow NOV progress review to take place, however, evidence of the outcomes and discussions of these meetings was not provided to the auditors. In addition, there was no evidence provided that SOV observation of NOVs was carried out sufficiently regularly to fully assess the competence of the NOV during this practical period, and when this occurred, the outcome was not recorded. Findings indicated that SOV supervision work tends towards a focus on desktop exercises such as reviewing essays, learning logs, NOV practical hours completed, and checklists, rather than the actual assessment of the NOVs' practical competence.</p> <p>Final assessment of NOVs is carried out by a panel consisting of FSS Field Veterinary Managers (FVMs) and the candidate. This process is a thorough exercise combining theoretical tests, practical scenarios and general questions. However, the auditors considered that this exercise should not replace, but work in conjunction with ongoing assessment.</p> <p><b><u>OV and MHI PARTS.</u></b></p> <p>There was sufficient evidence to indicate that the training material received by OV and MHI Trainees was adequate to enable them to acquire the required knowledge for the delivery of official controls in meat establishments.</p> <p>In order to ensure competencies are maintained, there is a process in</p>

	<p>place for both OVs and MHIs in which individual performance is recorded in a Performance Appraisal form and discussed at a Performance Management Review meeting. The process to obtain each individual's performance information varies from OV and MHI roles, and appeared to be dependent on the individual FVM and the Operational Manager (OM) respectively. The internal monitoring procedure presented as evidence was mainly focussed on Operational Key Performance Indicators (KPIs) and the status of the equipment used by field staff, with no clear link to individual performance. The auditors found that these processes could benefit from further improvements to ensure consistency and recording are maintained, as well as a clear link between performance and training.</p>
4 (b) (c)	<p><b><u>OV and MHI PARTS.</u></b></p> <p>Once in post there was evidence of compulsory training material and the issue of action notes for all staff in response to new emerging changes in legislative requirements and technical issues. Some of these courses and training material covered key topics such as imports, microbiology, sampling procedures, CCTV, and post-mortem requirements. There is also a list with optional training material and courses focussed on personal development which all members of staff can access, and complete upon approval by the relevant line manager. These points are well documented and recorded.</p> <p>The auditors acknowledged the sustained effort and good work carried out by FSS in this regard, including the provision of accredited courses and external training consultants.</p> <p>However, the auditors could not link the training material to the specific training needs for each individual to ensure that the individual's competence is maintained. Also, evidence examined indicated that there is not a clear documented Learning and Development strategy in place, detailing a logical career path for staff, based on competence and training needs, not only for FSS as an organisation but for each individual.</p>

**Good Practice**

It was noted that TMHIs in one of the courses set up an interactive workspace between them to exchange experiences, and discuss issues during the course.

**Good Practice**

It was noted that internal training has been set up in slaughterhouses in Operational Area 2, to ensure that the delivery of official controls by all attending TMHIs is done in a consistent manner.

Recommendations	<u>OV PART</u>
1.	The requirements of the SMOC Chapter 10 are to be updated to accurately reflect the legal requirements and the planned arrangements for the process of training OVs, including SOV tasks (or any other support mechanism in place), and the ongoing assessment of performance during TOV training.
2.	Internal monitoring procedures for TOV training to be put in place to ensure and demonstrate training and supervising/coaching procedures are being followed, as described in the planned arrangements
3.	A document control procedure to be applied, in particular to ensure that TOV recording forms are used as per the latest version.
4.	Forms to record the progress and competence of TOVs to be reviewed to ensure these capture the inputs of the OVs supervising TOVs, during the probationary period.
5.	When the OV course is externally delivered, FSS should obtain external validation and conduct internal verification exercises as to the content of the course.
6.	To ensure there is a sufficient number of SOVs and/or OVs within the operational structure to provide TOVs with the levels of supervision and support required for the plant environment.

Recommendations	<u>MHI PART</u>
7.	The requirements of the SMOC Chapter 10 are to be updated to accurately reflect the legal requirements and the planned arrangements for the process of training MHIs, including Assessor tasks.
8.	Trainees to be provided with IT equipment that is suitable and in good condition.
9.	Procedures for MHIs returning to field work after a period of non-service and MHIs working in unfamiliar areas to be reviewed, to ensure assessment of the level of competence is carried out, and, if needed, suitable (re) training given.

Recommendations	<u>OV and MHI PARTS</u>
10.	A Learning and Development strategy to be developed and implemented. In particular, to include that performance management is linked to individual training needs and the strategy.

3.3 Article 18. Specific rules on official controls and for action taken by the competent authorities in relation to the production of products of animal origin intended for human consumption.

Article	Audit Findings
18	This article was mainly included in the initial scope of the audit to capture the training needs of slaughterhouse staff assisting in the performance of

	<p>tasks relating to official controls, however, this part was removed from the final Audit Scope.</p> <p>Verification of compliance with official controls described in this Article can be undertaken by OV's and MHIs through the knowledge acquired in the training programme. The evidence examined indicated that the material of the training programme is suitable to deliver the required official controls.</p>
--	---

<b>Recommendations</b>
No recommendations for Article 18.

### 3.4 Annex II. Training of staff of the competent authorities.

Chapter	Audit Findings
I and II	Sufficient evidence was presented to support the suitability of the training content in relation to the official controls performed by the competent authority.

<b>Recommendations</b>
No recommendations for Annex II.

### Regulation (EU) No 2019/624 concerning specific rules for the performance of official controls on the production of meat.

#### 3.5 Article 1. Subject matter and scope.

Article	Audit Findings
1(c)	<p><b><u>OV and MHI PARTS.</u></b></p> <p>FSS has established specific minimum requirements, including training requirements for an O.V and a MHI designated to ensure adequate performance of the tasks described in Article 18 of Regulation (EU) 2017/625.</p>

<b>Recommendations</b>
No recommendations for Article 1.

3.6 Article 13. Specific minimum requirements for the official veterinarian, the official auxiliary (MHI) and the staff designated by the competent authority.

Article	Audit Findings
13.1	<p><b><u>OV PART.</u></b></p> <p>Specific minimum requirements for an OV performing tasks provided for in Article 18 of Regulation (EU) 2017/625 are given in Chapter I of Annex II of this Regulation. Evidence provided indicated compliance with the points of this chapter relevant to this audit, other than those mentioned <a href="#">below</a> (see recommendations 11, 12 and 13).</p>
13.3	<p><b><u>MHI PART.</u></b></p> <p>Specific minimum requirements for MHIs are given in Chapter II of Annex II of this Regulation. Evidence provided indicated compliance with the points of this chapter relevant to this audit, other than those mentioned <a href="#">below</a> (see recommendations 14, and 15).</p>

### Recommendations

Recommendations for Article 13 are embedded in recommendations for Annex II Chapter I and II below.

3.7 Annex II, Chapter I. Specific minimum requirements for the official veterinarian.

Chapter I	Audit Findings
1,2,3,4.	<p>As supported by the evidence examined, after the conclusion of the OV course, candidates must undertake a test to demonstrate knowledge of the training material as stated in the legislative minimum training requirements. The OVs interviewed presented the certificate obtained on passing this test. Appointment only takes place upon successfully passing the test.</p>
5.	<p>Through evidence gathered, it is the auditors understanding that, under the previous delivery model, NOV's were working independently during the probationary period, and that the levels of additional support from the SOV was inconsistent due to SOV unavailability. The auditors consider this level of supervision insufficient and it does not comply with the requirement for supervision cited in this article.</p> <p>In addition, the practical training for the probationary period does not fully meet the requirements of point 5 of this Annex, as NOV's, under the previous system, did not undertake any practical training at holdings.</p>

	The auditors were made aware of ongoing work taking place on the development of a new OV training proposal, which will be reflected within the recommendations made in the OV part of this audit report.
6.	Continuing Professional Development (CPD) records were presented as evidence. Line Manager's procedures include the review of these records at the time of the Performance Review. The evidence examined during the audit indicated that sufficient CPD hours were being carried out, but the content did not necessary link to a Learning and Development strategy.

Recommendations. OV Part	
11.	Visit to holdings to be considered as forming a practical training element for TOVs.
12.	During the probationary period and before starting to work independently, TOVs to be supervised by Official Veterinarians, as per legislative requirements.
13.	CPD material to be linked to Learning and Development strategically, to ensure that there is a clear and visible link between CPD material and a Learning and Development strategy (O.V part).

### 3.8 Annex II, Chapter II. Specific minimum requirements for the official auxiliary (MHI)

Chapter II	Audit Findings
II, 1 to 8	<p><b><u>MHI Part.</u></b></p> <p>There was sufficient evidence to support the adequacy of the training course and procedures in place to ensure that only candidates who have completed and passed the test are appointed as an MHI.</p> <p>The content of the training material and the assessment test covers all minimum requirements. In particular, the content of the unit F/617/0789 – Principles of Microbiology and Parasitology in Meat Production, and the related assessment documents, were forwarded to FSS's Science Division for review, with a very positive outcome.</p> <p>Both TMHIs interviewed commented that they could have benefited from visits to holdings within the practical side of their training. These visits are stated in point 5 (a.ii) of the Article as a requirement, hence this has been included as a recommendation in this report.</p> <p>Evidence examined indicated that MHIs are kept up to date on technical matters through action notes and compulsory training material. All MHIs are required to join the Institute of Food Science &amp; Technology (IFST) and record training activities on this platform. The auditors were also presented with a management spreadsheet with staff records of training completed on the EssentialSkillz platform. Similarly, to the OV part of this audit, the auditors found that the contents of the</p>



	training material did not necessary link to a Learning and Development strategy.
--	--

Recommendations MHI Part	
14.	Practical part of the MHI training to include attendance at holdings.
15.	CPD material to be linked to Learning and Development strategically, to ensure that there is a clear and visible link between CPD material and a Learning and Development strategy (MHI part).

## 4.0 Annex A – Action Plan

### Action Plan for Operational Delivery’s Division - Official Veterinarian (OV) and Meat Hygiene Inspector (MHI) Training, December 2021 – January 2022

Recommended Point for Action	Planned actions	Target date for completion	Responsible Officer(s)
<b>2017/625 Article 5</b>			
<p>1. The requirements of the SMOC Chapter 10 are to be updated to accurately reflect the legal requirements and the planned arrangements for the process of training OVs, including SOV tasks (or any other support mechanism in place), and the ongoing assessment of performance during TOV training.</p> <p><b><u>Priority - High</u></b></p>	SMOC Chapter 10 will be reviewed and updated.	July 2022	Veterinary Advisor
<p>2. Internal monitoring procedures for TOV training to be put in place to ensure and demonstrate training and supervising/coaching procedures are being followed, as described in the</p>	Internal Monitoring Policy will be reviewed and will include planned arrangements for management verification of TOV training programme delivery.	July 2022	Head Veterinarian

planned arrangements. <b><u>Priority - High</u></b>			
<b>3.</b> A document control procedure to be applied, in particular to ensure that TOV recording forms are used as per the latest version. <b><u>Priority - Low</u></b>	All documents/forms part of the TOV programme will be drafted/reviewed and version control applied. These latest versions will be included in SMOC Chapter 10 as annexes.	July 2022	Veterinary Advisor
<b>4.</b> Forms to record the progress and competence of TOVs to be reviewed to ensure these capture the inputs of the OV's supervising TOVs, during the probationary period. <b><u>Priority - High</u></b>	Supervising OV's comments will be added to the forms, in a specific section.	July 2022	Veterinary Advisor
<b>5.</b> When the OV course is externally delivered, FSS should obtain external validation and conduct internal verification exercises as to the content of the course. <b><u>Priority - Low</u></b>	Noted – if/when required (although the Division does not envisage delivering this externally anymore).	July 2022	Veterinary Advisor
<b>6.</b> To ensure there is a sufficient number of SOVs and/or OV's within the operational structure to provide TOVs with the levels	TOVs will never be deployed on their own; they are not authorised and will only be authorised upon successful completion of the programme. This will be articulated in the revised SMOC Chapter.	July 2022	Veterinary Advisor

<p>of supervision and support required for the plant environment.</p> <p><b><u>Priority - High</u></b></p>			
<p>7. The requirements of the SMOC Chapter 10 are to be updated to accurately reflect the legal requirements and the planned arrangements for the process of training MHIs, including Assessor tasks.</p> <p><b><u>Priority - High</u></b></p>	<p>SMOC Chapter 10 will be reviewed and updated to reflect the legal requirements and the planned arrangements for the process of training MHIs, including Assessor tasks.</p>	<p>July 2022</p>	<p>Veterinary Advisor</p>
<p>8. Trainees to be provided with IT equipment that is suitable and in good condition.</p> <p><b><u>Priority - Low</u></b></p>	<p>This will be formally raised to the IT team and Business Continuity Team/Department.</p>	<p>April 2022</p>	<p>Head Veterinarian</p>
<p>9. Procedures for MHIs returning to field work after a period of non-service and MHIs working in unfamiliar areas to be reviewed, to ensure assessment of the level of competence is carried out, and, if needed, suitable (re) training given.</p> <p><b><u>Priority - High</u></b></p>	<p>A section on this will be included in the SMOC, as part of the first action: the SMOC Chapter 10 will be reviewed and updated.</p>	<p>July 2022</p>	<p>Veterinary Advisor</p>

<p><b>10.</b> A Learning and Development strategy to be developed and implemented. In particular, to include that performance management is linked to individual training needs and the strategy. <b><u>Priority - High</u></b></p>	<p>Learning and Development strategies specific for the Operational Delivery Division will be drafted and likely included in the SMOC, rather than a separate document.</p>	<p>June 2022</p>	<p>Head Veterinarian</p>
<p><b>2019/624, Article 13, Annex II, Chapter 1</b></p>			
<p><b>11.</b> Visit to holdings to be considered as forming a practical training element for TOVs. <b><u>Priority - Medium</u></b></p>	<p>Visits to holdings will be provided as part of the training, the training programme reflects that the Animal and Plant Health Agency (APHA) colleagues have already confirmed they are happy to support FSS. The Division will send evidence to the audit assurance team once the two current TOVs have been on holdings.</p>	<p>July 2022</p>	<p>Head Veterinarian</p>
<p><b>12.</b> During the probationary period and before starting to work independently, TOVs to be supervised by Official Veterinarians, as per legislative requirements <b><u>Priority - High</u></b></p>	<p>The TOV training programme will specify that. Furthermore, TOVs will not even be authorised by FSS until completion of training, so in effect they will always be under qualified OVs during their training period. The SMOC will be updated to reflect this and new forms/ procedures/training timetable etc. will be included as Annexes.</p>	<p>July 2022</p>	<p>Veterinary Advisor</p>
<p><b>13.</b> CPD material to be linked to Learning and Development strategically, to ensure that</p>	<p>Learning and Development strategies specific for the Operational Delivery Division will be drafted and likely included in the SMOC, rather than as a separate document.</p>	<p>June 2022</p>	<p>Head Veterinarian</p>

there is a clear and visible link between CPD material and a Learning and Development strategy (O.V part). <b><u>Priority - High</u></b>			
<b>2019/624 Annexe II Chapter II</b>			
<b>14.</b> Practical part of the MHI training to include attendance at holdings. <b><u>Priority - Medium</u></b>	MHI practical training will include this going forward. FSS will engage with APHA and request their support.	July 2022	Head Veterinarian
<b>15.</b> CPD material to be linked to Learning and Development strategically, to ensure that there is a clear and visible link between CPD material and a Learning and Development strategy (MHI part). <b><u>Priority - High</u></b>	Learning and Development strategies specific for the Operational Delivery Division will be drafted and likely included in the SMOC, rather than as a separate document.	June 2022	Head Veterinarian
<b>All actions were completed following the receipt of evidence from the Operational Delivery Division – November 2022</b>			

## 5.0 Acknowledgements

The Audit Assurance Team would like to acknowledge the help and co-operation of FSS officers for their assistance with the conducting of this audit.

Auditors:     Pepe Martinez  
                  Graham Forbes  
                  Aine Phelan  
                  Tony Sykes  
                  Lindsay Matthew

Administration: Neil Douglas

Food Standards Scotland  
Audit Assurance Division

# Abbreviations

<b>APHA</b>	The Animal and Plant Health Agency
<b>CPD</b>	Continuing Professional Development
<b>EU</b>	European Union
<b>FBO</b>	Food Business Operator
<b>FSA</b>	Food Standards Agency
<b>FSS</b>	Food Standards Scotland
<b>FVM</b>	Field Veterinary Manager
<b>IFST</b>	Institute of Food Science & Technology
<b>KPI</b>	Key Performance Indicator
<b>MHI</b>	Meat Hygiene Inspector
<b>NOV</b>	Novice Official Veterinarian
<b>NVQ</b>	National Vocational Qualification
<b>OM</b>	Operations Manager
<b>OV</b>	Official Veterinarian
<b>PVS</b>	Private Veterinarian Surgeon
<b>SLA</b>	Service Level Agreement
<b>SMOC</b>	Scottish Manual for Official Controls
<b>SOV</b>	Supervisory Official Veterinarian
<b>SQA</b>	Scottish Qualifications Authority
<b>RSPH</b>	Royal Society for Public Health
<b>TMHI</b>	Trainee Meat Hygiene Inspector
<b>TOV</b>	Trainee Official Veterinarian