Chapter 2.10

Inspection and Attendance

Section 1  OV flexible attendance
Section 2  PIA guidance
Section 3  Annexes
1. OV Flexible attendance

1.1 Introduction

1.2 Flexible attendance general issues

1.3 Implementation of flexible attendance

1.4 Specific requirements: red meat slaughterhouses

1.5 Specific requirements: game handling establishments

1.6 Specific requirements: poultry establishments with MHI inspection

1.7 Monitoring of establishments with flexible attendance

1.8 Review/ removal of flexible attendance

1.9 FSS role

1.1 Introduction

1.1.1 Objective

This document sets out guidance for Veterinary Managers (VMs), to enable them to identify slaughterhouses and game handling establishments (GHEs) that do not require the full time presence of an Official Veterinarian (OV) during post-mortem inspection and to assess the OV hours required. The objective of the procedure is to provide a risk based framework to aid consistent decision making in respect of OV attendance.

1.1.2 Legislation

Regulation (EC) No 854/2004 requires the competent authority to ensure that an OV is present at slaughterhouses throughout ante-mortem and post-mortem inspection and at GHEs throughout post-mortem inspection.

Regulation (EC) No 1244/2007 allows for some exceptions to this requirement in establishments carrying out discontinuous slaughter or game handling activities.

In accordance with point 2(b) of Chapter II of Section III of Annex I to Regulation (EC) No 854/2004, the competent authority may decide that the
OV need not be present at all times during post-mortem inspection, provided that the following conditions are complied with:

- the establishment concerned is one which has undergone a risk assessment and has sufficient facilities to store meat with abnormalities until a final post-mortem inspection by the official veterinarian can take place
- an official auxiliary carries out the post-mortem inspection
- the OV is present in the establishment at least once a day when slaughter activities take place or have taken place
- the competent authority has put in place a procedure to assess on a regular basis the performance of official auxiliaries in these establishments, including:
  - monitoring individual performance,
  - verification of documentation with regard to inspection findings and comparison with the corresponding carcases
  - checks of carcases in the storage room

Reference: Regulation (EC) No 1244/2007 Annex II 2(a)

1.2 Flexible attendance general issues

1.2.1 Definitions

Discontinuous slaughter activities – activities do not take place continuously (i.e. all day, every day).

Flexible attendance – a risk assessment shows that the OV’s continuous presence during post-mortem inspection is not required.

Full time attendance – the OV is required to be continuously present at the premises throughout ante and post-mortem inspection.

For the purposes of applying OV flexibilities at all qualifying premises, EU regulations permit reduced OV presence on the basis of a risk assessment which shall cover public health, animal health and welfare assessments.

100% OV attendance (throughout post-mortem inspection) is not required when the Meat Hygiene Inspectors (MHIs) carry out post-mortem inspection at establishments meeting the flexible attendance risk assessment criteria.

1.2.2 Business Agreements

The Business Agreements (BA) meetings between FSS and Food Business Operators (FBOs) capture the service requirements for official controls. This
guidance will help assess these service requirements and best options for delivery.

BAs must capture the flexibility arrangements agreed with the FBO in the other business information section of the BA template. FSS Operations Managers (OMs) should capture the OV flexibility requirement on the BA as follows:

- capture broadly any flexible start/finish time of the OV as authorised by the VM.

OMs must make business decisions for the BA to establish the most cost efficient service which may result from OV Flexibilities at individual premises. The OV may be retained on site carrying out other inspection duties.

1.2.3 Inspection tasks

The OV must be allowed sufficient time to carry out the inspection tasks required by Regulation (EC) No 854/2004 Annex I, Section I, Chapter II:

**Note:** For details, please check sub-topic 1.3.7 on ‘Daily OV tasks’ and sub-topic 1.3.8 on ‘Team tasks’ in topic 1.3 on ‘Implementation of flexible attendance’.

In relation to flexible attendance, it is important to note that OVs, when present, will be checking on compliance with the Hygiene Regulations and, where necessary, carry out enforcement. However, the Regulations do not require OVs to remain at an establishment specifically to carry out hygiene checks once they have completed their responsibilities as above unless they have identified public, animal health and/or welfare issues that require their continued presence.

1.2.4 Cold inspection

‘Cold inspection’ occurs when there is no official presence during dressing of carcases. The OV leaves after ante-mortem inspection and either an MHI or OV returns later to carry out post-mortem inspection. The Guidance is set in Annex 4 of this chapter.

1.2.5 Risk analysis

The Regulations require a risk analysis to be carried out to determine whether flexible attendance can be implemented at specific premises. The risk analysis is primarily carried out to assess the risk that unfit meat might be placed on the market if the OV is not present to supervise post-mortem inspection. The following points are to be taken into account when carrying out the risk assessment:
1.2.6 Comparison between full time and flexible attendance

The following chart shows the comparison between full time and flexible attendance requirements:

<table>
<thead>
<tr>
<th></th>
<th>AM</th>
<th>PM</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Full time Attendance</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Slaughterhouses</td>
<td>OV</td>
<td>OV/ MHI/ PIA</td>
</tr>
<tr>
<td>GHEs</td>
<td>N/A</td>
<td>OV/ MHI</td>
</tr>
<tr>
<td><strong>Flexible Attendance</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Slaughterhouses</td>
<td>OV</td>
<td>MHI/ OV part time</td>
</tr>
<tr>
<td>GHEs</td>
<td>N/A</td>
<td>MHI/ OV</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(An OV must attend at least once a month or every operating day if conditionally approved)</td>
</tr>
<tr>
<td>Premises with cold inspection</td>
<td>OV</td>
<td>OV/ MHI (end of operations)</td>
</tr>
</tbody>
</table>

1.3 Implementation of flexible attendance

1.3.1 FBO role

FBOs wishing to apply for flexibility in OV attendance need to discuss their eligibility with their FSS OM in the first instance during BA meetings. The OM should then contact the VM and inform them of the FBO’s request. Any risks identified to the OV not being on site during production must be fully considered by the FBO before requesting OV flexibility in their establishment.
1.3.2 Veterinary Manager (VM) role

All establishments within the VM’s span of control must undergo an OV flexibility assessment utilising the outcome of the last 2 completed FBO full audits. For establishments where a flexible attendance arrangement was implemented, this assessment will be used for monitoring purposes (see topic 1.7 on ‘Monitoring of establishments with flexible attendance’). The VM should actively look for opportunities to implement flexibility liaising with service delivery partners and local inspection teams to identify opportunities available. The VM is responsible for the co-ordination of tasks necessary to implement flexible attendance. Once informed about FBO’s interest in flexible attendance the VM should make contact with the FBO and explain the process and requirements. The VM will carry out a desktop check to confirm the premise’s eligibility based on previous audits, enforcement entries and prior documented information related to the premise’s compliance with hygiene and animal welfare requirements. The VM will request the FBO to produce in advance the relevant procedures to accommodate any OV flexibility. Once the procedures have been drafted to the VM’s satisfaction, the VM should agree a date with the FBO, (informing the OV and the contract Area Veterinary Manager) to visit the premises and to carry out the assessment necessary to evaluate suitability of the premises for implementation of the flexible arrangement.

1.3.3 Examples where flexible attendance should be considered

Each establishment is different and opportunities for flexible attendance will vary. There are, however, common aspects that should be considered when looking at the operational pattern, process details and options for reduced level of official controls. The following operational examples could indicate to the local FSS team and FBOs that there are opportunities for flexible attendance:

- scheduled arrivals of animals allowing for planning of operations and official auxiliaries carry out PM
- inspection, for example, the OV can leave early or arrive late depending on the plant production and FBO requirements
- establishments in a local geographical area which may be served by one roving OV (serving multiple premises), with official auxiliaries carrying out PM inspection

1.3.4 General requirements for implementation of flexible attendance

All establishments wishing to implement flexible attendance arrangement must meet the following general requirements:
Compliance history (full audit period utilised) – Implementation of flexible attendance will only be considered in establishments with good compliance history utilising the outcomes from the last 2 completed FBO audits. The audits and compliance assessment must provide evidence of:

- ‘Good’ or ‘Generally satisfactory’ outcome
- any non-compliances raised by the FSS team are promptly resolved by the FBO (no need to routinely escalate to formal enforcement, HINs, RANs)
- robust procedures for AMI positive release systems with no failures in the last audit period
- good welfare standards (e.g. no ‘critical’ welfare non-compliances)
- implemented and maintained food safety management system based on HACCP principles (including adequate controls over removal and disposal of SRM)

Throughput/animals slaughtered – The daily species/ type of animals slaughtered, the throughput of the establishment and the line speed should not compromise food safety. Specifically, the official auxiliary should have enough time to inspect all animals and put aside meat with uncommon conditions for OV inspection. The FBO should ensure that only young and healthy animals are slaughtered, or adequate arrangement should be in place for slaughter of older animals. The FBO should not accept animals originating from farms under movement restrictions due to diseases or on farm emergency slaughter unless a provision is made for the post-mortem to be carried out by the OV.

Ante-mortem arrangement – Positive ante-mortem release system has to be implemented and maintained to ensure that only animals that have undergone ante-mortem inspection have been slaughtered for human consumption.

Facilities for storage of meat – Adequate facilities have to be in place for storage of meat with uncommon conditions for OV inspection for all species slaughtered.

Ante and post-mortem inspection records (last 3 month period) – FSS ante and post-mortem records for the establishment wishing to implement a flexible attendance arrangement should not indicate frequent and regular findings that would require OV consultation / inspection.

1.3.5 Specific requirements

In addition to the general criteria, the specific requirements applicable to certain types of establishments must be taken into consideration. (See topic 1.4 on ‘Specific requirements: Red meat slaughterhouses’, topic 1.5 on
‘Specific requirements: Game handling establishments’ and topic 1.6 ‘Flexible attendance: Poultry establishments with MHI inspection’.

1.3.6 Assessment of premises

The VM should carry out an assessment of each premise taking into consideration the operating practices and agreed operating hours, using ‘Assessment for OV Flexible Attendance’ at Annex 1.

The plant documentation should be requested by VM in advance and the FBO should send it prior to the reality check taking place.

<table>
<thead>
<tr>
<th>Assessment process steps</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 VM agrees a date with the FBO, informing the OV and contractor Area Veterinary Manager and visits the premises to carry out the assessment.</td>
</tr>
<tr>
<td>2 VM uploads Annex 1 ‘Assessment for OV Flexible Attendance’ form to the area SharePoint site</td>
</tr>
<tr>
<td>3 VM informs the area OM and HOD on the recommendation, in writing.</td>
</tr>
<tr>
<td>4 OM notifies SDP Area Veterinary Manager and FBO about the recommendation and agrees BA.</td>
</tr>
<tr>
<td>5 VM populates the OV Flexibility information specific to the establishment in the OV flexibility Database on eRDM</td>
</tr>
</tbody>
</table>

1.3.7 Daily OV tasks

When assessing the premises the VM must be satisfied that the OV will have enough time to carry out the daily OV tasks, which include:

**Food chain information** – all FCI records provided by the FBO must be assessed by the OV prior to slaughter.

**Ante-mortem inspection** – all animals slaughtered for human consumption must undergo ante-mortem inspection carried out by the OV less than 24 hours before slaughter.

**Welfare checks** – the OV should assess the welfare of animals at intake or in the lairage and ensure a system is established to verify welfare up to and including the stun/ stick/ bleed process. Daily welfare checks can be carried out by the Official Auxiliary as per the instruction in chapter 2.3 on ‘Animal welfare’.

**Post-mortem inspection** – the OV should carry out the PMI verification check as per the detailed instruction in chapter 2.4 on ‘Post-mortem, health and identification marking’. In the case of emergency slaughtered animals, the OV must personally carry out the post-mortem inspection.
Enforcement – the OV should spend as much time as needed to take an enforcement action (or further investigate) when their daily checks, or checks carried out by other members of the FSS team, indicate that the FBO is not in compliance with relevant requirements of food hygiene/animal welfare law.

Paperwork/records – sufficient time should be provided to the OV to complete all daily paperwork and records, as required by FSS policies and procedures. Administrative tasks however, can be delegated to the MHI team.

1.3.8 Team tasks
Before flexible arrangement is implemented, the VM must be satisfied that there are adequate and suitably trained staff and FSS procedures that cover:

- post-mortem inspection – all animals slaughtered for human consumption must be subject to post-mortem inspection

- SRM removal and handling – the OV is expected to use the ‘Risk Based Decision Tool for SRM Inspections’ on a regular basis to set the frequency of checks as per chapter 2.7 on ‘Specified risk material controls’. Depending on the frequency that was set (daily/every 5 days), the FSS team must carry out all SRM removal, handling and disposal verification checks as per details in chapter 2.7 on ‘Specified risk material controls’

- animal-by-products – the OV is expected to use the ‘Risk Based Decision Tool for ABP Inspections’ on a regular basis to set the frequency of checks. FSS team must verify that all animal by-products are correctly identified, stained and stored until collection as per the instruction in chapter 2.8 on ‘Animal by-products’

- animal identification – daily FSS cattle ID checks must be carried out to the frequency set by the OV (based on FBO’s compliance history) as per chapter 2.5 on ‘Animal identification’, section 4

- sampling – all required sampling takes place and samples are appropriately identified and handled and sent to the appropriate laboratory for testing

- records keeping and data input – a system must be in place to ensure that all records are kept and maintained and all data is correctly and timely inputted into relevant systems (for example: FSS IT system, SharePoint etc.)

1.3.9 Hours of attendance by OV
The times set out by the VM in the flexibility assessment are only indicative. The OV is expected to respond to issues as they arise as they would in a plant without OV flexibility.
1.3.10 Appeals

Appeals by the FBO against the decision of the VM should be made through the Business Agreement appeal system, as detailed in the charging guide.

1.3.11 Unforeseen unavailability of the OV

In the event of an emergency that makes the OV unable to attend a premise during operating hours, emergency measures could be implemented by the FBO, in consultation with the VM and OM. The measures should be adopted safeguarding animal welfare, public health and animal health as key priorities.

With the exception of the first requirement (i.e. last 2 FSS audits with a Generally Satisfactory or Good outcome), all other items from Annex 1 should have been previously assessed by the VM and found satisfactory. A list of all slaughter premises assessed will be retained centrally by FSS and referred to when OM/VM is approached by an FBO in exceptional circumstances. The exceptional circumstances translate into the request to clear the line, not to continue the slaughter of other animals.

1.4 Specific requirements: red meat slaughterhouses

1.4.1 Flexible OV attendance at red meat slaughterhouses

Meat with pathological changes that may indicate a notifiable disease will trigger veterinary advice to be sought immediately. Arrangements must be in place for the OV to examine uncommon abnormal meat identified at PM inspection, including where slaughter does not take place on sequential days. More about abnormal common/uncommon meat can be found in chapter 2.4 on ‘Post-mortem, health and identification marking’.

1.4.2 OV attendance at post-mortem inspection in red meat premises

The activities and circumstances which require OV attendance at post-mortem inspection in red meat premises are:

- where facilities are insufficient to hold carcasses and offal with uncommon conditions for OV inspection
- for post-mortem inspection of:
  - animals that have undergone emergency slaughter
  - animals that are suspected of having a disease or condition that may adversely affect human health or animal health
  - cattle from herds not declared officially free of TB
• cattle, sheep and goats from herds that have not been declared officially free of brucellosis

• in the case of an outbreak of a notifiable animal disease to which the animals concerned are susceptible and which come from the affected region

• to confirm identity and verify correct disposal of carcases when a non-negative BSE test result is received

1.4.3 Red meat premises with cold inspection

The OV should make scheduled PMI visits to check on the accuracy of the post-mortem inspection by the MHI at a frequency outlined in the instructions for PMI in chapter 2.4 on ‘Post-mortem, health and identification marking’.

1.5 Specific requirements game handling establishments

1.5.1 Flexible OV attendance at game handling establishments

Game Handling Establishments are eligible to be considered for flexible OV attendance during post-mortem inspection. Refer to previous topic 1.2 on ‘Flexible attendance: General issues’ and the previous sub-topic 1.3.4 on ‘General requirements for implementation of flexible attendance’.

If the establishment is conditionally approved, the plant should not be considered for OV flexibility until full approval is granted.

1.5.2 OV attendance at post-mortem inspection in game handling establishments

The suitability of a GHE for OV flexibility will be assessed at the final approval visit and a recommendation made to the HOD via the VM.

The activities and circumstances which require OV attendance at post-mortem inspection in game handling establishments are:

• where facilities are insufficient to hold all carcases and offal with uncommon abnormalities and OV inspection (only uncommon abnormal findings need be held for OV inspection not common PM findings)

• for post-mortem inspection of animals suspected of having a disease or condition that may adversely affect human health or animal health

• in the case of an outbreak of a notifiable animal disease to which the animals concerned are susceptible and which come from the affected region.
1.6 Flexible attendance: Poultry establishments with MHI inspection

1.6.1 Flexible OV attendance at Poultry establishments with MHI PM Inspection

Flexible OV attendance during PM inspection does not apply in poultry premises at times when PIAs are assisting with post-mortem inspection.

Reference: Regulation (EC) No 854/2004 Article 5, 6 (a)

Reference: Regulation (EC) No 854/2004 Annex 1, Section II Chapter III

Poultry slaughterhouses with MHIs are eligible to be considered for flexible OV attendance during post-mortem inspection. Refer to previous topic on ‘Flexible attendance: General issues’ and the previous sub-topic 1.3.4 on ‘General requirements for implementation of flexible attendance’.

The MHI may discard abnormal poultry meat. Uncommon abnormal meat does not need to be systematically inspected by the OV; however:

- the OV must have time to complete their specific inspection duties to inspect the viscera and body cavities of a representative sample of birds each day (statistically a minimum of 300 birds per day)
- the OV must have time to undertake a detailed inspection of a random sample of rejected carcases/ parts of carcases from each batch of birds

1.6.2 OV attendance at post-mortem inspection in poultry slaughterhouses

The activities and circumstances which require OV attendance at post-mortem inspection in poultry slaughterhouses are:

- for post-mortem inspection of birds suspected of having a disease or condition that may adversely affect human health or animal health
- in the case of an outbreak of a notifiable animal disease to which the birds concerned are susceptible and which come from the affected region.

1.6.3 Poultry premises with delayed evisceration

The OV/ MHI/ PIA shall inspect all carcases and viscera following delayed evisceration. Where PIAs are utilised the OV must attend at all times during the process.

Where the MHIs are carrying out PM inspection, the VM shall establish an OV site visit routine to verify operations dependant on throughput and general assessment.
The FBO must contact the Operations Manager/ OV with sufficient notice, so that FSS can arrange for adequate supervision levels.

1.7 Monitoring establishments with flexible attendance

1.7.1 Monitoring

FBOs in establishments with flexible attendance arrangements in place should have their performance regularly monitored. For that purpose FSS will use as indicators the information gathered during the official control tasks (for example, audit outcomes and enforcement action records).

FBOs must be able to demonstrate that all public health, animal health and welfare risks are controlled and that the flexible attendance does not create any additional risks associated with their process.

As part of FSS monitoring, the VM is required to carry out three types of assessments:

1. post implementation assessment – to be carried out four weeks after implementation of flexible attendance; following this assessment, the VM must complete the form ‘Post implementation assessment’ at Annex 2 and upload it to the local SharePoint site.

2. on-going annual review – this will be done for the GHEs at the time of the VM annual reality check. For SHs, there is no requirement for this, as point 3 below covers the scenarios where a review should be triggered.

3. triggered assessment – to be carried out by the VM, if there is evidence that an establishment no longer fulfils the criteria to maintain a flexible attendance arrangement (based on audit outcome, compliance history or changes to operational procedures); the VM should complete ‘Assessment for OV Flexible Attendance’ at Annex 1 and upload it to the local SharePoint site. Monitoring and triggers for review are as follows:

- Audit outcome (Improvement Necessary/ Urgent Improvement Necessary) – plants who have previously been assessed as suitable for OV flexibilities falling in to Improvement Necessary/ Urgent Improvement Necessary FBO audit outcome categories must have OV flexibilities removed. The VM is responsible for monitoring FSS audit data to assess performance of establishments and for triggering a removal of flexibility.
Manual for Official Controls | Amendment 14

- Compliance of FBO – Establishments where formal notices have been issued for hygiene non-compliances or critical welfare non-compliances have been found will have the flexibility assessment arrangement reviewed.

- Changes to operational procedures – the level of flexibility might need to be assessed if the FBO or OV notifies the VM of changes to operational procedures at the establishment (for example, changes in pattern, animal delivery, type of animals processed). The VM will review the flexibility arrangements in such circumstances.

1.7.2 Outcome of VM assessments

Following the completion of any assessment, the VM should confirm to the OM if the levels of attendance can be maintained (or further decreased).

In cases where the VM finds sufficient evidence that criteria for flexible attendance are no longer met, they can recommend to increase the level of attendance or remove the flexible attendance arrangement as detailed in the topic 1.8 on ‘Review/Removal of flexible attendance’.

1.7.3 Assessment of performance of official auxiliaries

The performance of official auxiliaries deployed in establishments with a flexible attendance arrangement in place should be regularly assessed by the OV as follows:

- PMI verification checks which will allow OVs to monitor post-mortem performance and accuracy of judgement

- OV should verify on a monthly basis that PM records are accurate and all procedures are followed. Records of that verification should be kept in the FSS day book

1.8 Review/Removal of flexible attendance

1.8.1 Review

The flexible attendance arrangement can be reviewed if the VM finds during monitoring sufficient evidence that requirements for flexible attendance are no longer met, the VM can increase the level of attendance (including complete removal of FA arrangements). In those cases the VM should follow the process steps below.

Note: The OV hours will be reviewed at each Business Agreement meeting.
1.8.2 **Process steps**

The table below details process steps that should be followed during the review of flexible attendance arrangement by the VM:

<table>
<thead>
<tr>
<th>Process steps</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Outcome of VM assessment indicates that the requirements for flexible attendance are not met.</td>
</tr>
<tr>
<td>2. VM discusses the outcome of the visit and evidence gathered with the relevant AVM and OV</td>
</tr>
<tr>
<td>3. VM informs the OM and HOD about the recommendation to increase attendance, in writing</td>
</tr>
<tr>
<td>4. OM notifies FBO about the recommendation and agrees BA</td>
</tr>
<tr>
<td>5. VM updates the OV flexibility information specific to the establishment</td>
</tr>
</tbody>
</table>

1.8.3 **Appeals**

Appeals by the FBO against the decision of the VM should be made through the Business Agreement appeal system.
2. PIA System

2.1 Introduction

2.2 Legislation

2.3 Assessment arrangements

2.4 Roles and responsibilities

2.5 Establishments assessment process

2.6 Establishment permit assessment

2.7 Establishment monitoring assessment

2.8 Withdrawal of establishment permit

2.9 Hybrid PIA / FSS systems

2.10 TUPE considerations

2.11 Assessment process for poultry establishments wishing to move to PIA system

2.12 Assessment process for poultry establishments already using PIAs

2.1 Introduction

This section outlines a standardised process to assess suitability of poultry slaughterhouses to use Poultry Inspection Assistants (PIAs) to carry out official control duties.

2.2 Legislation

Chapter III A (a) of Regulation (EC) No 854/2004 states:

‘Where the establishment has used good hygiene practice in accordance with Article 4(4) of this Regulation and the HACCP procedure for at least 12 months, the competent authority may authorise staff of the establishment to carry out tasks of official auxiliaries. This authorisation may only be granted if
the staff of the establishment have been trained, to the satisfaction of the competent authority, in the same way as the official auxiliaries for the tasks of official auxiliaries or for the specific tasks they are authorised to perform.

This staff must be placed under the supervision, direction and responsibility of the official veterinarian. In these circumstances, the official veterinarian shall be present at ante-mortem and post-mortem examinations, shall supervise these activities and carry out regular performance tests to ensure that the performance of the slaughterhouse staff meets the specific criteria laid down by the competent authority, and shall document the results of those performance tests.

Where the level of hygiene of the establishment is affected by the work of this staff, where this staff does not carry out the tasks properly or where in general this staff carries out its work in a manner that the competent authority considers unsatisfactory, this staff shall be replaced by official auxiliaries.’

2.3 Assessment arrangements

FSS must demonstrate that it has a standardised and robust system in place to assess those premises wishing to move from a MHI to a PIA system. This is known as an establishment permit assessment.

In order to ensure a consistent approach, for those premises already using PIAs, assessments must also be completed on their suitability to continue with PIA systems. This is known as an establishment monitoring assessment. This assessment should be based on FBO food safety management systems, PIA performance and capability of the PIAs to address hygienic and process issues.

The required establishment PIA assessment is separate to the approval assessment that will already have been completed in poultry slaughterhouses. For example, for PIA systems to be introduced, amongst other areas, the FBO must have had an appropriate HACCP procedure in place for at least 12 months. This is not something that would be considered as part of the approval assessment for start-up premises.
2.4 Roles and responsibilities

2.4.1 Head of Operational Delivery
The HOD is the owner of this process with the Veterinary Managers having responsibility for all technical aspects.

2.4.2 Operations Manager
The decision making process will take place at a business area level. OMs, with the ultimate support of the HOD, will manage operational implications and will determine timescales for introduction of any changes, in consultation with the FBO and VM. Human resources colleagues will provide support on staffing issues.

2.4.3 Veterinary Manager
VMs will be required to carry out necessary technical assessments in their clusters, on behalf of the HOD.

The VM will use information provided by the OV and local FSS Team on the day-to-day running of the business by the FBO when making their assessment. They should discuss any resource implications with the OM.

Where further assurance or guidance is required (for example, where the FBO does not agree with the VM decision), another VM may provide additional technical advice.

The VM will also carry out the establishment assessments or provide advice to the OM/ HOD on the best course of action if technical issues arise.

2.4.4 Approvals and Certification Team
The Approvals and Certification Team will be responsible for the administration of the establishment permit process. They will maintain copies of the permit visit reports and keep records of all assessed establishments centrally. Following a successful establishment assessment, a letter will be sent from the Approvals and Certification Team to the FBO confirming the establishment’s PIA permit. They will also be responsible for coordinating establishment permit withdrawal process.

2.4.5 Official Veterinarian
The Official Veterinarian (OV) is responsible for PIA assessments and constant monitoring of their performance. Where PIA performance is found to be inadequate, the OV should record the findings on the form PIA PM-1 at Annex 5.
2.5 Establishment permit assessment

2.5.1 Notify OM

An FBO should make a request to transfer to a PIA system to the OM, who should inform the VM at the earliest opportunity. The OM will need to consider staffing implications and impact on existing FSS staffing at the premises.

2.5.2 VM action

The VM must visit the establishment and complete relevant parts of the ‘Assessment of PIA systems in poultry slaughterhouses’ PIA 4 form (Annex 3). A technical decision is required on whether the necessary systems are in place. This assessment should be completed in accordance with deadlines established by the VM and OM (in consultation with the FBO).

2.5.3 Suitable outcome

In this instance the OM and VM will discuss timescales and operational management of the process with the FBO.

The VM should email a copy of the completed PIA 4 form to the Approvals and Certification Team. The team should update the central record of assessed establishments, send an authorisation letter to the FBO and notify Approvals and Certification Team of the outcome.

2.5.4 Unsuitable outcome

The VM should share their findings with the FBO and OM and include the reasons behind their decision in writing. An action plan should be provided by the VM of the areas that need improvement and timescales discussed with the FBO. The VM should monitor progress towards addressing the necessary requirements. Once corrective actions are implemented, the VM must carry out a further assessment, upon the request of the FBO.

After the further assessment has been completed, the VM should notify the FBO and OM of the outcome and email a copy of the completed PIA 4 form to the Approvals and Certification Team for information and filing. The Approvals and Certification Team should update the central record of assessed establishments and send a copy of the report to the FBO.
2.5.5 **Appealing the outcome of a refused establishment permit assessment**

Where the FBO does not agree with the VM decision, they may appeal to the Head of Operational Delivery (HOD). The HOD is responsible for appointing a VM from a different area as an Investigating Officer.

The Investigating Officer will have 14 days to gather the required evidence, conduct the investigation and submit a report with findings and conclusions to the HOD.

The Investigating Officer might consider visiting the premises before concluding the report.

Upon completion of the investigation the HOD will advise the FBO of the outcome of the appeal in writing.

2.6 **Establishment monitoring assessment**

2.6.1 **Monitoring**

All establishments permitted to use PIA system shall undergo a regular monitoring assessment to determine if the level of hygiene of the establishment is not affected by the work of PIA staff.

The frequency of the monitoring assessment will be risk based and correlated with the audit frequency of the establishment.

At least one plant assessment should be carried out by VM between full FBO audits. The frequency of the monitoring assessments is based on the current audit system outcome; establishments with the lowest audit score should be assessed at least once every two months and the best performing plants once every 18 months.

<table>
<thead>
<tr>
<th>Audit outcome</th>
<th>Full audit frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Good</td>
<td>18 months</td>
</tr>
<tr>
<td>Generally satisfactory</td>
<td>12 months</td>
</tr>
<tr>
<td>Improvement necessary</td>
<td>3 months</td>
</tr>
<tr>
<td>Urgent Improvement necessary</td>
<td>2 months</td>
</tr>
</tbody>
</table>

An additional establishment monitoring assessment can be triggered, regardless of the audit frequency, if serious concerns are raised by FSS field team regarding poor level of compliance (for example, sudden decline in hygiene standards, insufficient staffing levels, serious HACCP failures).
For establishments awarded poor audit scores ('Improvement Necessary’ or ‘Urgent Improvement Necessary’) an assessment should be carried out as soon as possible from the date of the audit report being sent to FBO.

During the assessment the VM should complete relevant parts of the establishment assessment PIA 4 form.

Where the VM already has a good knowledge of the establishment, it may be possible to complete the monitoring assessment as a desktop exercise, in consultation with the establishment OV. Establishments falling within the Improvement Necessary/ Urgent Improvement Necessary categories should be visited.

### 2.6.2 Suitable outcome

The establishment is considered suitable to continue with its PIA system. In this instance, the VM will complete the establishment assessment PIA 4 form and discuss their findings and decision with the FBO, also informing the OM of the outcome. A copy of the PIA 4 form should be sent to the Approvals and Certification Team.

### 2.6.3 Minor deficiencies outcome

The establishment has minor deficiencies that must be addressed to allow the FBO to continue using PIA systems. The VM should advise the FBO in writing on corrective actions that are considered necessary to ensure that the PIA inspection system can continue. The VM should also agree a reasonable timescale for the completion of such actions.

In conjunction with the establishment OV, the VM will monitor progress to ensure that the identified deficiencies are addressed. The VM should use their professional judgement to decide if a further establishment visit is necessary. A copy of the PIA 4 form should be sent to the Approvals and Certification Team.

### 2.6.4 Major deficiencies outcome

The establishment has major deficiencies that must be corrected to allow the FBO to continue using PIA systems. Where there are major deficiencies – such as serious or multiple hygiene breaches, poorly implemented/ maintained food safety management system, PIAs failing to perform their duties to the required standard and/ or allowing unhygienic / unfit product to enter into the food chain - the VM should discuss findings with the FBO and OM.
A support MHI may be introduced onsite as an interim measure until the necessary deficiencies are addressed. This will need to be within a short timescale, depending on the nature of the risks.

The VM should provide the FBO with a written summary of identified deficiencies and a clear timeframe to rectify them.

In conjunction with the slaughterhouse OV, the VM should monitor the establishment to ensure that the identified deficiencies are addressed.

The VM should carry out an additional monitoring assessment within an agreed timeframe. In this assessment, the VM must consider whether:

- the FBO has remedied the deficiencies;
- an extension to the MHI support role is needed; or
- a full reversion to an MHI system is necessary.

The OM will need to consider operational implications, and should liaise with their HOD and VM as appropriate. A copy of the PIA 4 form should be emailed to the Approvals and Certification Team.

**Note:** Reverting back to a MHI system should only happen where it is clear that arrangements are unsatisfactory and that the FBO is not taking appropriate responsibility to implement corrective actions and ensure that public health is safeguarded.

### 2.7 Withdrawal of establishment PIA permit

Where very serious deficiencies are identified during the routine monitoring assessment visit, the FSS local management might consider increasing the level of official controls in the premises and deployment of additional FSS staff.

1. VM communicates to the FBO the deficiencies identified during the monitoring assessment and provides a timeframe for rectification. All identified issues and non-compliances have to be communicated to the local FSS management (OM, HOD) at the same time.

2. VM is required to reassess the establishment within the agreed timeframe to evaluate improvement.

3. VM must communicate the outcome of the second assessment to the FBO and confirm the suitability of the PIA system or recommend to the HOD a withdrawal of establishment PIA authorisation if the observed improvement was not satisfactory.
4. Findings of the reassessment and recommendation made by VM must be discussed within the local FSS OMT. Sufficient evidence supporting the recommendation should be presented to the HOD.

5. HOD assesses the evidence and advises the FBO and the local FSS team in writing of his decision.

2.8 Hybrid PIA/FSS systems

Hybrid PIA/FSS systems may be acceptable under exceptional circumstances, for example, in larger industrial slaughterhouses where MHIs carry out online inspection duties at certain inspection points, and others are manned by PIAs. Typically though, an FBO would be expected to have an OV only; an OV plus MHI team or OV plus PIA(s) model in place.

As described above, use of support MHIs may also be accepted as an interim measure at slaughterhouses using PIAs where it is judged that premises have major measurable deficiencies which must be corrected to allow the FBO to continue using PIA systems.

2.9 TUPE considerations

The Transfer of Undertakings (Protection of Employment) (TUPE) 2006 Regulations preserve employees’ terms and conditions when a business or undertaking, or part of one, is transferred to a new employer. FSS has received legal advice that the transfer from FSS MHI to PIA systems (or reverse) could be challenged under the TUPE 2006 Regulations.

OMs must be aware of possible implications of TUPE when discussing staffing options with FBOs of poultry slaughterhouses and should consult with Human Resources colleagues in this event. Opportunities for redeployment within FSS will still need to be considered, in the normal way.

It remains a commercial decision for the FBO in determining whether to move to a PIA system. FBOs wishing to implement a PIA system must seek their own legal advice on the impact of TUPE.
# 2.10 Assessment process for poultry establishments wishing to move to PIA system

<table>
<thead>
<tr>
<th>FBO</th>
<th>Start → 1. FBO makes a request to OM to transfer to PIA System → 7. FBO appeals decision.</th>
</tr>
</thead>
<tbody>
<tr>
<td>VM</td>
<td>2. OM considers staffing implications and informs VM → 3. VM carries out assessment &amp; completes PIA form. → 4. VM informs FBO (and OM) of the outcome. → 6.1 Premises not suitable to have PIA System: action plan and timescales agreed with FBO to improve. → 6.2 Premises suitable to have PIA System: agree timescales and management of process with FBO &amp; VM 2 = IO → 10. VM amends PIA form as necessary, depending on outcome.</td>
</tr>
<tr>
<td>OM</td>
<td>5.1 Approvals and Certification Team receives a copy of VM's assessment (PIA) form. → 5.2 Approvals and Certification Team sends establishment authorisation letter to FBO and keeps a central record of all authorised establishments. Approvals notify Operations.</td>
</tr>
<tr>
<td>VM 2 = IO</td>
<td>9. VM (IO) conducts investigation and reports findings to HOD → 8. HOD nominates VM (different area) as IO and notifies FBO of outcome of appeal.</td>
</tr>
<tr>
<td>Head of Operational Delivery</td>
<td>End</td>
</tr>
<tr>
<td>Approvals and Certification Team</td>
<td></td>
</tr>
</tbody>
</table>

---

*Chapter 2.10 Inspection attendance*
*Food Standards Scotland*
2.11 Assessment process for poultry establishments already on the PIA system

OM

<table>
<thead>
<tr>
<th>VM</th>
</tr>
</thead>
<tbody>
<tr>
<td>2. VM carries out the assessment according to schedule (or reassesses if deficiencies were found during scheduled assessment).</td>
</tr>
<tr>
<td>3. VM informs FBO and OM of the outcome of assessment.</td>
</tr>
<tr>
<td>4.1 Premises have major deficiencies to rectify.</td>
</tr>
<tr>
<td>4.2 Premises have minor deficiencies to rectify.</td>
</tr>
<tr>
<td>4.3 Premises suitable to have PIA System.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>HOD</th>
</tr>
</thead>
<tbody>
<tr>
<td>5.1 VM agrees action plan and timescale with FBO/OM to rectify deficiencies.</td>
</tr>
<tr>
<td>5.2 OM considers introduction of supporting MHIs based on VM's advice.</td>
</tr>
<tr>
<td>5.3 VM agrees action plan and timescale with the FBO to rectify deficiencies and reassesses (if necessary revisits).</td>
</tr>
<tr>
<td>6. VM recommends withdrawal of authorisation if no improvement is observed during reassessment.</td>
</tr>
<tr>
<td>7. HOD considers the recommendation and communicates the decision to FBO, FSS team and Approvals.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Approvals and Certification Team</th>
</tr>
</thead>
<tbody>
<tr>
<td>8. Approvals team notifies the FBO about the withdrawal of the establishment’s PIA permit in writing and updates the record of establishments with implemented PIA system.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Approvals and Certification Team</th>
</tr>
</thead>
<tbody>
<tr>
<td>Start</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Approvals and Certification Team</th>
</tr>
</thead>
<tbody>
<tr>
<td>Finish</td>
</tr>
</tbody>
</table>

1. FSS Operations keeps record of plants requiring assessment, passes the list/schedule to VM. |

3.1 FSS Operations keeps centrally record/copy of assessment (PIA form) and updates the schedule.
3. Annexes

Annex 1  OV Flexible Attendance – assessment
Annex 2  OV Flexible Attendance – post implementation assessment
Annex 3  PIA – assessment of PIA systems in poultry slaughterhouses (PIA 4)
Annex 4  Cold inspection guidance
Annex 5  PIA performance monitoring (PIA PM-1)