

OFFICIAL CONTROL VERIFICATION

OCV IMPLEMENTATION GUIDE

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Overview

Figure 1 below outlines the proposed strategy for implementation of the OCV approach in Approved Establishments throughout Scotland. This strategy takes into consideration recommendations from the pilot, the roll out of the OCV training programme and the proposed Approvals chapter of the Code of Practice. It also aims to minimise the anticipated increase in resources through a phased implementation.

It should be emphasised that this strategy is the recommended approach to achieve the anticipated full implementation date of April 2022. Local Authorities may chose an alternative approach, however, this may result in a more noticeable impact on resources if the implementation period is significantly reduced.

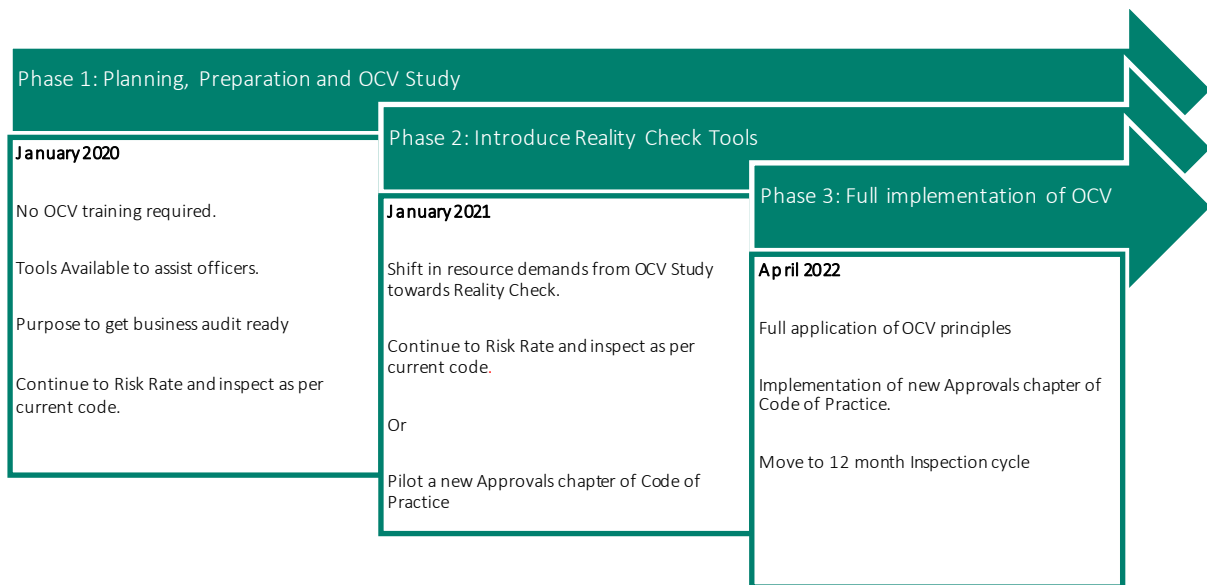


Figure 1: OCV Phased Implementation

Phase 1 Overview

Phase 1 involves carrying out an OCV Study for each approved establishment. This should assist the officer in assessing the validity of the FBO's FCMS i.e. does the FBO intend to do the right thing?

The tasks involved at this stage are primarily information gathering, research and HACCP assessment. Therefore, it is not necessary for an officer to have attended OCV training to carry out an OCV study. Guidance on carrying out an OCV Study can be found in the OCV Guidance. There is also a separate guidance document on the HACCP Study aspect of the OCV Study.

In terms of the physical inspection and reality check, officers may continue to carry this out as they did prior to OCV. Once officers have completed the OCV training they may then start to introduce reality check tools at their own pace to familiarise themselves with the process.

During this phase it is recommended that officers begin to utilise the OCV Forms, including the Business Profile Form, FCMS Review and Physical and Prerequisites forms.

Where an inspection is not due within Phase 1, there is no expectation that this be brought forward.

In the case of an establishment which has multiple or complex processes officers may find it beneficial to initially focus the OCV study on the highest risk process or product.

Phase 2 Overview

It is anticipated that by the start of Phase 2, all Local Authorities will have a number of officers trained in the OCV process.

The OCV study carried out in phase 1 will require to be reviewed to consider changes to the business, documented procedures or knowledge and understanding in relation to the processes and products.

The key development in phase 2 will be the introduction of reality check inspections using OCV tools. This may naturally lead officers to break the inspection up into multiple, focused visits, however, inspections will continue to be risk rated as per the existing Code of Practice.

Phase 3 Overview

Officers will continue to build on the work of phase 1 and 2 by reviewing OCV studies and carrying out reality check inspections using OCV tools.

By this stage it is anticipated that the Approvals Chapter of the Code of Practice will be in place. This should allow for the resource calculation referred to in the guidance to be implemented, thereby replacing the existing risk rating process with an estimated annual resource requirement. The officer will have flexibility as to how best to allocate the estimated resource to a specific establishment.

Planning and Preparation

Officer Knowledge and Experience

OCV is strongly linked to an establishment's Food Control Management System and therefore requires a good knowledge and understanding of the HACCP principles and their application in approved establishments.

Knowledge equivalent to Level 4 HACCP is considered essential, however, it is recognised that officers may develop this knowledge without having attended a Level 4 HACCP training course.

Where officers do not have experience in assessing FCMSs in approved establishments, it is recommended that they are given the opportunity to do so by accompanying suitably experienced officers.

The OCV training programme is being rolled out and, as officers complete this, it is recommended that they begin to introduce reality check tools into their inspections as soon as possible in order to gain confidence and experience in their use.

However, there is nothing to prevent officers using reality check tools prior to attending the training course if they wish to do so.

Communication with businesses

It is recognised that the OCV approach will have an impact on businesses as well as Local Authorities. Whilst feedback during the consultation was positive, it is recommended that businesses are advised of the likely impact on them.

Template letters are available which can be issued to businesses outlining the background to OCV and impact it may have on them. Alternatively, officers may choose to discuss the changes at their first on site meeting with the business.

IT requirements

Officers may find that, on occasion, they need to request more information from businesses than they have done in the past. In such circumstances it is possible that existing IT systems may block the transfer of this information due to size restrictions.

Recommendations are given later in this guidance as to how this problem can be mitigated. However, if it is anticipated that large amounts of information will still be required beyond current limits, it is recommended that contact is made with the LAs IT services to determine whether there is access to file sharing websites or whether IT systems would permit officers access to an FBOs own file sharing system.

Resource Allocation

The resource requirements for an OCV inspection cycle can be estimated using the resource calculation within the OCV Guidance. A template spreadsheet will be developed to assist officers in calculating and documenting the resource calculation and this will be made available on Knowledge Hub.

Experience from Local Authorities involved in the pilot indicates that during the initial inspection cycle, the time required for the OCV study is likely to be greater than the time estimated in the calculation, however, this significantly reduced by the second inspection cycle.

It is recognised that in most cases the resource requirements for an establishment will increase compared with the existing inspection process. However, the phased implementation of the OCV process is intended to minimise this anticipated impact on resources.

Inspections

OCV Study and Document Review

It is recommended that officers only request the business information required for the specific aspect of the inspection being carried out at any particular time. This has the benefits of ensuring the officer has current information whilst reducing the potential burden on the business in relation to provision of the information. It also minimises the need for the Local Authority to store unnecessary information.

Prior to starting the OCV Study it will be necessary to ensure that the Business Profile is up to date. This will then allow the officer to determine the highest priorities for the OCV Study such as high risk products or any which may have been missed in the scope of the FSMS.

Resources to assist officers in carrying out an OCV Study and Document Review can be found on SFELC OCV Implementation Working Group pages on the Knowledge Hub at <https://khub.net/group/sfelc-approvals-pilot-working-group>

Inspection Planning

The OCV approach of multiple, focused inspections allows officers to adapt their approach to suit each business. However, the following points may be worth considering, particularly during the initial implementation of OCV:

Recommendations	Benefits
Announced visit at start of inspection cycle	Allows officer to complete/update business profile During first inspection cycle allows officers to discuss OCV approach with business
In larger/complex businesses, focus first OCV inspection on highest risk products or processes only.	Targeted use of resources, particularly if large numbers of Approved Establishments or small number of staff carrying out these inspections. Risk Based Allows officers to focus on specific product/process whilst gaining experience in OCV process

Recording of Evidence

The OCV approach places emphasis on evidence and therefore recording of this is important.

The OCV Guidance includes template forms which are available in word format in order to allow Local Authorities to adapt them to suit their own circumstances.

It is anticipated that as more officers carry out reality check inspections additional template forms may be developed and these will be made available through Knowledge Hub where appropriate.

Recommendations	Benefits
Use of photographs to document evidence	Reduces time recording information. Acts as a reference for more detailed review off site.
Use of highlighting or different colour text on forms for concerns/problems/non-compliances etc.	Need to positive record as well and this allows easy distinction between positive and negative evidence.
Type Forms which have review sections included	Time saving as much information will remain consistent
Hand write reality check forms	These will be completed new each inspection cycle and so little benefit in typing.

Administration

Risk Rating

Approved Establishments fall outwith the scope of FLRS and so should not be risk rated using this system.

The OCV Guidance includes a resource calculation which estimates the time which will be required for each inspection cycle. The proposed inspection cycle length is 12 months, however, it is anticipated that this will be clarified in the approvals chapter of the Food Law Code of Practice.

In the interim period, officers should continue to risk rate Approved Establishments for both food hygiene and food standards using Annex 5 of the Food Law Code of Practice.

Where officers start to introduce multiple, focused inspections as referenced in the OCV guidance it is recommended that the establishment is risk rated on the initial inspection based on the available evidence. Additional visits are then recorded as revisits and the initial risk rating reviewed retrospectively if required.

Reporting

Where the inspection cycle is broken up into multiple partial inspections, it is recommended that a report be provided following each partial inspection.

Q&As

Can we apply OCV to non-approved establishments?

The OCV tools are likely to be useful in the inspection of many non-approved establishments and officers are encouraged to apply them where they consider it appropriate to do so.

However, non-approved establishments should continue to be rated using FLRS. During the planning phase both food safety and food standards aspects should be scheduled into the initial visit in order to facilitate an FLRS score.

How does OCV relate to Food Standards?

The OCV approach integrates food standards with food hygiene considerations. As with food hygiene inspections, rather than carrying out a single inspection it is likely that the food standards aspects will naturally be broken up and raised during the relevant focused inspections.

OCV tools such as Mass Balance and Evidential Triangulation are particularly useful for food standards, for example in the verification of labelling accuracy.

Review

This guidance will be reviewed periodically during the early implementation phase of OCV. Please contact the OCV Implementation Working group via sfelc@fss.scot in relation to:

- Additional implementation resources you feel may be beneficial on Knowledge Hub
- Examples of implementation which may be beneficial to share with other officers
- Questions you would like added to the Q and A section of this document.