



progressive

Food Standards Scotland

Evaluation of the
Official Controls Verification Pilot

Final Report
28 March 2019





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1. Introduction

This report sets out the findings of the Evaluation of the Official Controls Verification Pilot (the Pilot), undertaken by Progressive Partnership for Food Standards Scotland during 2018.

1.1 Background

Food Standards Scotland (FSS) is the public sector food body for Scotland. In April 2015 FSS was established by the Food (Scotland) Act 2015 as a non-ministerial office, part of the Scottish Administration, alongside, but separate from, the Scottish Government.

The fundamental goal of FSS is consumer protection – making sure that food is safe to eat and ensuring consumers know what they are eating.

Approved Food Establishments

Regulation (EC) No 853/2004 of the European Parliament and of the Council of 29 April 2004 lays down specific hygiene rules for food of animal origin; which requires that all establishments involved in the handling, preparation, or production of products of animal origin are approved by a Competent Authority (CA). This includes establishments involved in handling, preparing, and producing products of animal origin – including fish or fish products, shellfish, meat products, minced meat and meat preparations, dairy products and egg products.

In Scotland, Regulation (EC) No 853/2004 is enforced by one of two CAs: Food Standards Scotland or Local Authorities (LAs), depending on the nature of the food business:

- FSS is responsible for approving slaughterhouses, cutting plants and game handling establishments; as well as associated meat-processing activities carried out on these sites. If a plant has additional on-site cold stores, minced meat, meat preparation or meat products establishments, FSS also approves these.
- LAs are responsible for the approval of establishments that process or handle food using other products of animal origin, including: meat processing not co-located with a FSS approved premises, fishery products, milk and dairy products and live bivalve molluscs and eggs.

The CA carry out routine Interventions at the approved establishments within their remit to ensure that the food businesses are complying with food law requirements, and are operating within relevant standards of animal health and welfare.

Approvals in Scotland: Concerns

Previous Third Country, European and Food Standards Agency in Scotland (now FSS) audits identified some areas of concern in the delivery of official controls in approved establishments across Scotland. In response to these concerns, FSS in partnership with the Scottish Food Enforcement Liaison Committee (SFELC), implemented a programme of work to improve the delivery of interventions in approved establishments.

Subsequently, the SFELC Approved Establishments Working Group (AEWG) reviewed the interventions work associated with approved establishments and suggested a system of enhanced direction through new and updated guidance and bespoke training.

The proposed new system comprises:

- Training: five-day, intensive, bespoke Official Control Verification (OCV) training;
- Updated guidance: the '*Scottish National Protocol*';
- New guidance: the '*Verification of Food Safety Management Systems – Principles for Official Controls in the Approved/Manufacturing Sector*'.

The SFELC Approved Establishments Working Group Pilot

The new system was a substantive change in officer practice. Therefore, before rolling out the new system, a Pilot was required. The aims of the Pilot were to:

- Determine proof of concept when applying the document principles, i.e. is it fit for purpose;
- Evaluate the impact (time/resource/financial) of the new system on food businesses;
- Evaluate the CA resource (time/staff) required to deliver the new system, inclusive of resources before, during, and after inspections, considering specialist food and general environmental officers;
- Assess if the new system:
 - Increases food business compliance;
 - Increases CA confidence in food control.

Ten CAs (that is, nine local authorities and FSS) volunteered to take part in the Pilot, which would involve approximately 50 approved establishments.

The Pilot was scheduled to run between late 2017/early 2018 and run for about a year. However delays in starting meant the Pilot did not get underway until the spring 2018, effectively reducing the project time Pilot time to just six months.

1.2 Objectives of the evaluation study

A key strand of the Pilot was to undertake an independent evaluation of the Pilot objectives, focussing on the process and implementation of the Pilot. A number of research questions were set for this piece of work:

- Is the new system fit for purpose?
- What is the impact of the new system on food businesses? E.g.
 - Time
 - Resource
 - Financial
- What CA resource (time/staff) is required to deliver the new system?
 - Resources needed before inspections
 - Resources used during inspections
 - Resources needed after inspections
- Does the new system?
 - Increase food business compliance
 - Increase CA confidence in food control.

Two broad limitations of the study are noted:

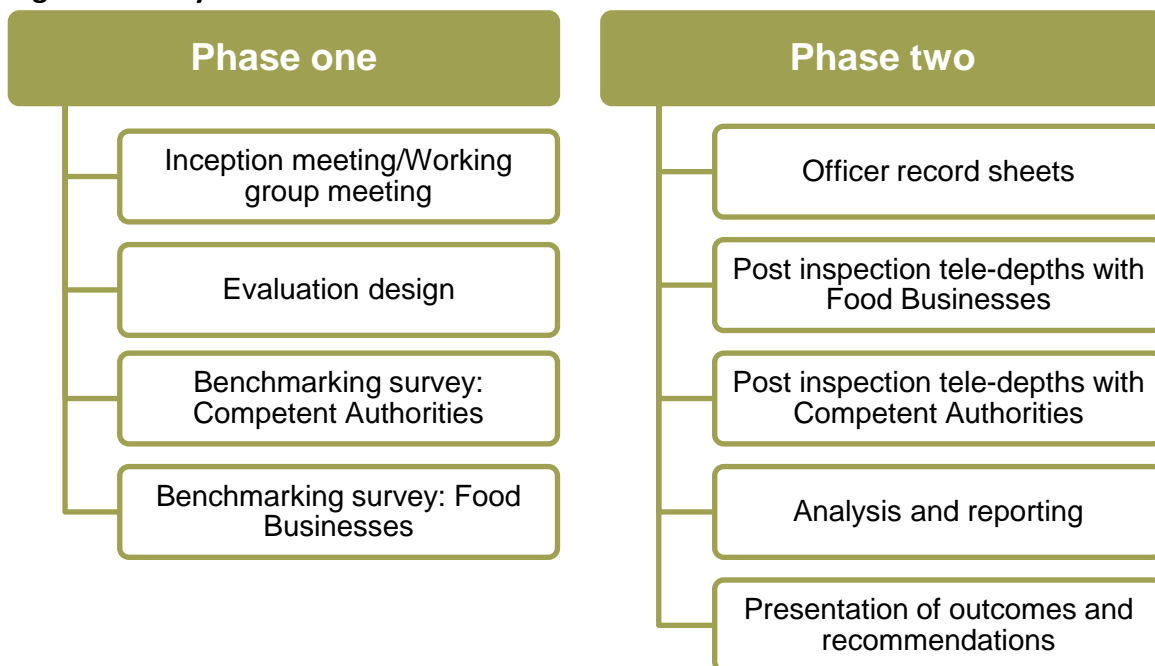
- First, the study is designed to evaluate the impact on compliance. It does not/cannot test this empirically, in terms of changes in levels of compliance achieved as a consequence of the new system. Instead, the evaluation measure is officer and business views of impact on compliance, together with the reasons for that impact.
- Second, it is noted the evaluation findings relate to the Pilot, and any conclusions relate to the participating authorities. We cannot comment on the extent to which these views can be extrapolated to the whole of Scotland.

2. Approach

The Pilot ran throughout 2018, and was carried out in two phases. The first phase focussed on scoping and set-up; and was largely undertaken between December 2017 and March 2018 (with extensions allowed for late returns of questions through April). The second phase was concerned with data collection, analysis and reporting; and was undertaken from March 2018 to January 2019.

The key elements of each phase are summarised in the figure, and the core components of the study are described below.

Figure 1: Study Outline



2.1 Benchmarking surveys

A benchmarking exercise was undertaken to underpin the analysis, and provide an understanding of the nature and direction of change as a consequence of the new system. It had been anticipated sufficient information for this task would have been available from secondary sources. However, following discussions with the Working Group and a review of the published data¹, it was concluded a short bespoke data collection exercise would be required. Consequently, two short survey instruments were designed:

- The first to collect information from the authorities (CAs);
- The second to collect information from food businesses (FBs) about their practice, experience and views of the approvals system pre-Pilot.

¹Annex 5 of the Food Law code of practice:

http://www.foodstandards.gov.scot/downloads/Food_Law_Code_of_Practice_Scotland_.pdf

Table 1: Benchmarking surveys: sample

	Competent Authorities	Food Businesses
Description of the survey	Survey of the FSS and local authority officers working on the Approvals Pilot.	Survey of all the food businesses included in the Approvals Pilot
Type of survey	On-line	On-line
Sample frame	The contacts provided by FSS project team.	Provided by Working Group. This ensured FSS was unaware which businesses had participated in the study. Correspondence containing information referencing participant FBs remained confidential at all times, and was not copied to FSS project officers.
Sample	45 officers across the 10 competent authorities were invited to take part. The target was for all invited officers to participate.	Details of 53 businesses selected for inclusion in the Pilot were invited to take part in the survey*.
Maximising the response	Reminder emails were issued by Progressive at intervals during the fieldwork. The Working Group reminded staff to complete the Survey. The closing date was extended to enable as many staff as possible to complete.	Reminder emails were issued at intervals during the fieldwork. Food officers contacted Pilot businesses and asked them to complete the survey
Response	39 officers completed the survey (87% response rate).	29 businesses responded to the survey (55% rate)**
Key topics	Inspection activities – undertaken and contribution Resources Importance and role of the Approvals Inspection and of third party inspections Preparation for the Approvals Pilot	Documentation – required and ease of provision Inspection – activities and usefulness Resources Importance and role of the Approvals Inspection and of third party inspections
Fieldwork	16 March and 27 April 2018	16 March and 27 April 2018
<p>*There were some minor changes in the businesses included in the Pilot as the Pilot progressed. When the benchmarking survey was issued, 53 contacts were available. **There was a delay in one CA securing permission to share contact details for the Pilot FBOs in their local authority area. This meant that invitations to the FBOs were issued later than elsewhere: 20 April 2018.</p>		

2.2 Officer record sheets

Information was collected about the officers' experience undertaking the Pilot. Officers were asked to complete a record sheet for each food business inspected during the Pilot, providing information on the preparation and planning stage, activities during each of the visits, and inspection outcomes (including resources required). The new system was designed to be undertaken in stages, over an extended period of time, the record sheets were set up so that they too could be completed in stages (or modules).

The record sheets allowed for completion by more than one officer, on the presumption that different officers could be involved at different stages of the inspection process. Each record was therefore assigned an ID and password, to enable the CAs to maintain confidentiality within the records while they were in use.

Table 2: Officer record sheets: sample	
	Competent Authorities
Description of the survey	Online exercise completed by officers within FSS and local authorities undertaking the Pilot. The records sheets were modular, designed to be completed by the officers on an ongoing basis, as the officers completed each stage/visit within the new system.
Type of survey	Online
Sample frame	Provided by the Working Group and LAs. 57 businesses initially included the Pilot Across the 10 Competent Authorities
Process	<ul style="list-style-type: none"> Regular reminders were sent to Lead Officers during the Pilot, to remind them of the evaluation requirements (i.e. to open and complete record sheets) Records sheets were submitted once inspection cycle was complete and record sheet was completed. At close of fieldwork, all outstanding record sheets were submitted
Sample size and response	The time available to the project was significantly reduced. As a consequence, the number of inspections started was reduced, and the number completed reduced. This was reflected in the final sample for the officer record sheets: <ul style="list-style-type: none"> Total sample: 51 Cycle complete: 21 Cycle incomplete: 30
Response	All CAs participated in the ORS exercise.
Fieldwork	Commenced in May. A final completion date was set for 27 Oct 2018.

By the end of September, 14 record sheets had been completed and submitted. It was appreciated that the delayed start to the Pilot would prevent some of the scheduled Pilot inspections being completed within the evaluation timescale. To ensure sufficient time for data analysis, authorities were asked to submit their record sheets by middle of October² as follows:

- Submit Officer Record Sheets for completed inspections;
- Submit incomplete Officer Record Sheets, for all inspections that has been started as part of the Pilot (completing all relevant modules, including the final “reflections” sections);
- Update on food businesses that had been withdrawn from the Pilot/inspections.

Some 57 businesses had been listed within the Pilot business database. However, some were removed over the Pilot period, and a total 51 record sheets were finally submitted by the authorities. Reasons for removing businesses from the pilot included rationalising/streamlining the number of businesses in the pilot, and business-related related reasons (changes to the business process, plant, personnel, which would greatly increase the complexity of the exercise).

Of these 51 records, 21 were in relation to inspection cycles that were complete, and 30 were in relation to inspection cycles that were incomplete. Only one of the authorities completed all of the

² The deadline was extended to end of October to accommodate full completion of the record sheets

(six) inspections they had planned for the Pilot, while three of the authorities did not complete any of the inspections they had planned.

2.3 Post-inspection Interviews

To complement the detailed data collection being undertaken using the officer record sheets, qualitative work was undertaken to explore the views of all parties involved in the Pilot process. This covered two groups: food businesses and the lead officers in competent authorities.

2.3.1 Food business interviews

A telephone survey of the food businesses (FBs) inspected under the Pilot system was undertaken. The FBs were contacted and invited to take part in the interview either:

- Following completion of the Pilot inspection cycle for business;
- At the end of the Pilot period.

All the businesses involved in the Pilot were contacted, and invited to participate in a post-Pilot interview. All the businesses who agreed to be interviewed (10 of the 51 in the Pilot) were businesses whose inspection cycle was complete. This should be borne in mind when considering the evidence collected from these interviews.

These interviews were directed by using a semi-structured topic guide, and took between 20 and 40 minutes to complete. The interviews included questions designed to gauge the impact of the new system on the food business in terms of time, costs and resources. They also explored views on the likely impacts on compliance, effectiveness (in control) and support.

2.3.2 Competent authority interviews

Finally we conducted a series of semi-structured telephone interviews with the appropriate lead officers/head of service in each of the 10 CAs. These interviews were undertaken towards the end of the fieldwork period, and were designed to capture information on the impacts of the new system at a more strategic level, both on the service as a whole within that CA and any knock-on impacts on other services; explore unintended impacts; and collect feedback on effectiveness and suggestions for improvements.

All the interviews were carried out by the senior researchers involved in the study; and were recorded with the permission of respondents³.

³ All but one of the respondents granted permission for recording.

Table 3: Post inspection interviews		
	Food Businesses	Competent Authorities
Description	Interviews with food businesses following Pilot inspection, to collect their views and experiences of the new system	Interviews with lead officers following Pilot inspection, to develop a strategic overview of the new system
Method	Semi-structured telephone interviews	Semi-structured telephone interviews
Sample frame	Business contact details provided by Working Group (see benchmarking Surveys above)	Contacts provided by FSS project team
Sample size and response	Businesses were contacted once the Officer Record Sheet was completed* 10 businesses agreed to be interviewed – a response of 20%	The contact/lead officer in each of the competent authorities was interviewed. In some cases, the officer also involved colleagues from their Pilot team. Lead officers from all 10 authorities were interviewed – 100%
Key topics	Information provision pre-inspection Information requests The OCV approach: - Planning - Methods - Reporting - Impact on business Assessment - Resources - Impact on compliance	Preparation for the Pilot: e.g. staff training, procedures and systems, documentation, resourcing The OCV approach: - Planning - Documentation – collection and review - Methods - Outcomes Assessment - Resources - Impact on compliance - Assessment and way forward
Fieldwork	3 September and 16 November 2018	22 October and 16 November 2018
* 51 record sheet were returned, 1 of whom indicated they did not want to be contacted by Progressive with respect to further research.		

3 Findings

3.1 Pre–Pilot benchmarking⁴

The benchmarking surveys were undertaken to provide context to the Pilot evaluation. The surveys captured information on practice under the current system, the level of resource that both business and officers expended undertaking inspections, and their views on compliance under the current system.

3.1.1 Document provision and inspection planning

When asked about previous experiences of providing documentation Businesses said they were always asked to provide information on the Food Safety Management System by their Food officer. Most (more than 80%) were also asked to provide information on pest control arrangements, cleaning and disinfection arrangements, water supply testing, record keeping, products, and product testing. All businesses were asked for some documentation as part of the Inspection process.

Generally businesses found it easy to pull together the documents requested by the officer: 21% found it very easy and a further 55% fairly easy. It may be worth noting that the post-inspection interviews clarified that these document requests were almost always fulfilled when the officer visited the business, and there was not an expectation that the business would provide/send the information to the officer in advance.

Table 4: Documents requested by Food officers		%
The food safety management system		100%
Pest control arrangements		93%
Cleaning and disinfection arrangements		90%
Water supply quality testing arrangements		86%
Arrangements for record keeping		86%
A description of the products to be produced		86%
Arrangements for product testing		83%
Traceability arrangements for ingredients, packaging and products		79%
A detailed scale plan		76%
Waste collection and disposal arrangements		76%
A description of the water supply		76%
Arrangements for applying the ID mark to product packaging		76%
Arrangements for monitoring staff health		66%
Equipment maintenance arrangements		62%
Base		29

Q1: Which of the following food safety documentation has the inspecting officer requested from you?

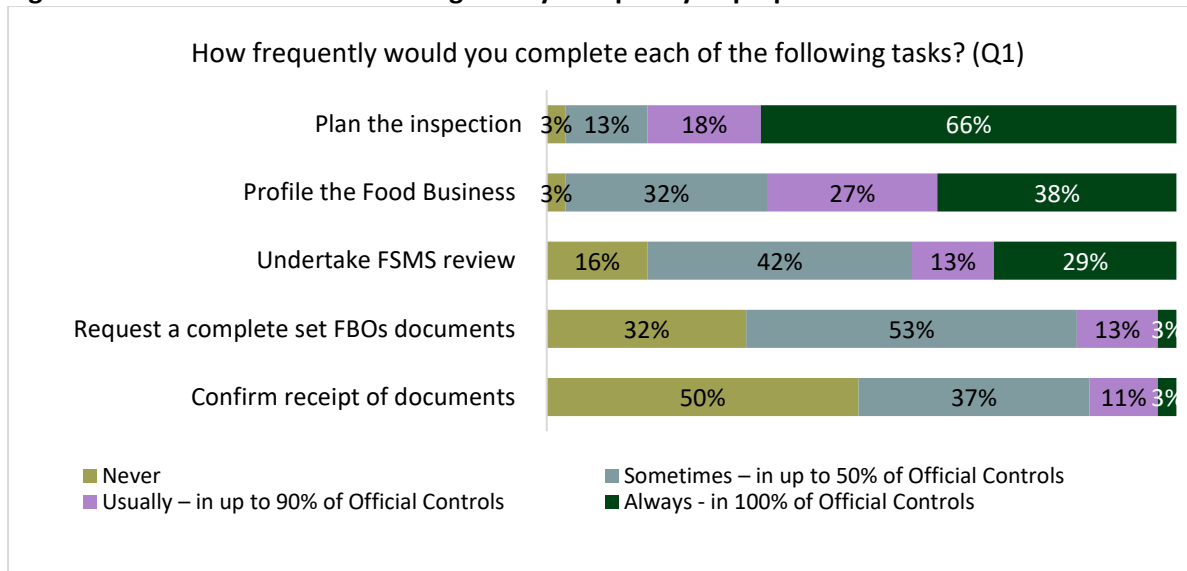
Food officers almost always planned the inspection (66% always, a further 18% usually). The other main activities undertaken by officers in preparation for the inspection were producing a profile of the

⁴ This section of the report draws on evidence from the Benchmarking Survey: Food Business; and Benchmarking Survey: Local Authority Food Officer

business (38% always, 27% usually) and a review of the business’s food safety management system (38% always, 27% usually).

While few officers always/usually requested a complete set of documentation, 69% of officers did so at least occasionally.

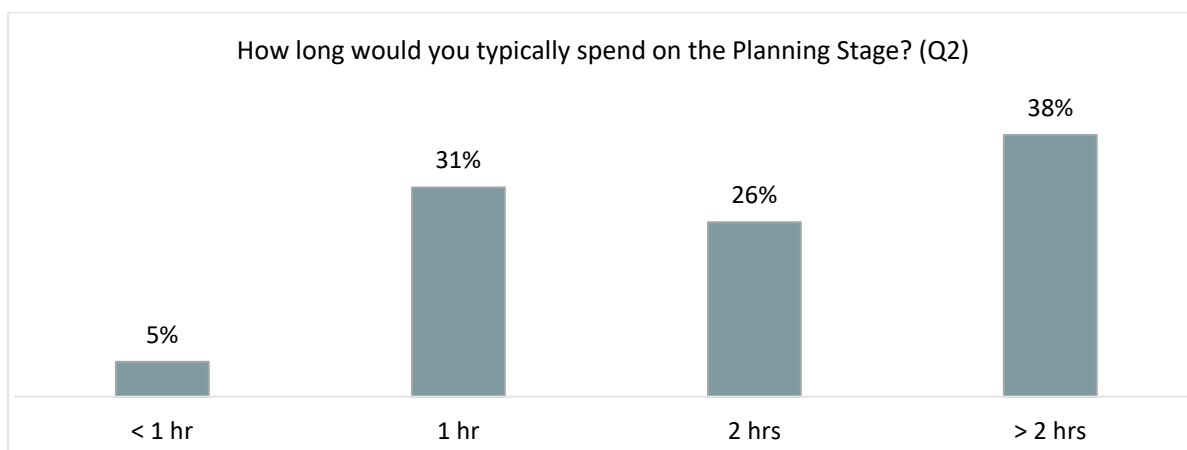
Figure 2: Food Officers Benchmarking Survey: Frequency of preparation activities



Base (all excluding don't knows) 37-38

The time Food officers spent preparing for Official Controls varied between none (2 officers) and 14 hours (1 officer). The average time spent preparing was about 2.75 hours.

Figure 3: Food Officers Benchmarking Survey: Typical planning time



Base (all) 39

3.1.2 Inspection Stage

Food Businesses

Businesses generally reported that Food officers undertook the inspection activities ‘usually’ or ‘all of the time’. Indeed almost all (97%) businesses always had an opening meeting with Food officer, and most (86%) always received a final report setting out inspection findings and actions required.

Lowest reported rates were for “review of documentation”: 66% said the officer always reviewed documentation, while 13% said the officer only sometimes/occasionally reviewed documentation.

Food businesses tended to find the inspection activities beneficial. In particular, almost all (93%) said they found the initial meeting which set out the inspection process the closing meeting, and final report beneficial.

Businesses were less positive about the inspection of the processes: just 46% considered review of documentation very beneficial, while 13% felt it was not very helpful; and just 43% considered the inspection of processes, practices and records very beneficial, while 7% felt this was not very helpful.

Almost all (86%) of the Food Businesses spent between 1 and 10 hours preparing for Official controls, with most spending in the region of 3 to 4 hours (41%). The average (mean) time spent was about 9.4 hours⁵.

Most (76%) of businesses consider the time preparing to be appropriate, while 10% think it not very appropriate. None said it was not at all appropriate.

Food officers

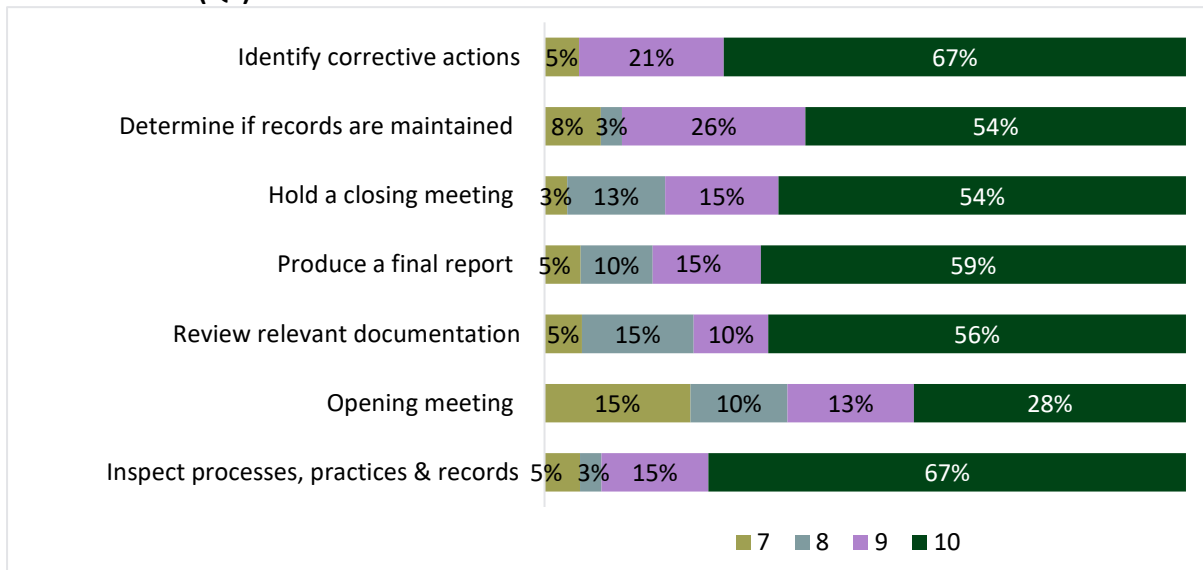
When undertaking inspections, officers almost always: produce a final report (95%), review records (87%), undertake a closing meeting (87%) and have an opening meeting (84%). There is no inspection activity that officers **always** undertake.

The opening and closing meetings are the only activities that officers may occasionally **not** undertake

Officers were positive about the contribution made by each of the activities outlined in the figure 4 in delivering the official controls: when asked to rate their contribution on a scale of 1 to 10, almost invariably (85%) activities scored at least a 7. Two thirds (67%) of officers rated ‘identifying corrective actions’ and ‘inspecting processes, etc.’ at a 10. Notably, officers tended to place highest weight on assessing processes and documentation, as well as determining corrective actions whereas businesses tended to value activities that involved highest levels of engagement (opening closing meeting, final report – as shown above).

⁵ One of the respondents said they spent 100 hours preparing, considerably longer than the others. If this case is removed from the analysis, the average time falls to 6.2 hours.

Figure 4: Food Officers Benchmarking Survey: The contribution of each activity in delivering the Official Control (Q4)



Base (all): 39

When asked about the time requirements for inspections the time reported ranged between less than one hour (cited by two of the officers) and eight hours (also by two officers). The average time was four hours – this was both the mean, and the median (cited by 15 officers).

3.1.3 Importance of Approval

Food Businesses

Food Businesses were asked how important the inspections are to their businesses. For many (79%) businesses, the inspection was a business essential – they need it in order to trade.

It was also considered either very or fairly important in providing assurance for food safety (82% of businesses), food authenticity (62%) and for providing customer assurance (66%).

Just 31% indicated that the inspection was required to enable them to export; a further 45% said this was not applicable.

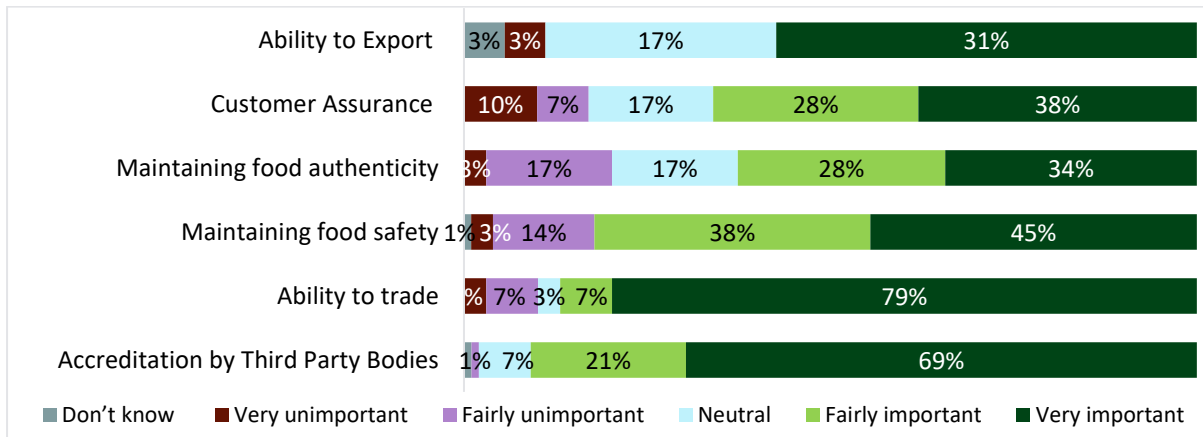
Notably, 69% of Food Businesses noted accreditation by other organisations – such as specific trade bodies, was very important and a further 21% said fairly important – this in line with the level for the Food Law inspections.

Food businesses were also asked how well they considered the current system supports key aspects of their business.

- Almost all felt that the system enabled the Inspector to understand their business (52%: very well and 45% fairly well).
- Around four-fifths felt that the system supported maintaining food safety and good advice from the Inspector (both 55% very well and 28% fairly well). Businesses with a quality management team were more likely than those without to say the current system supports them very well in maintaining food safety (70% vs 22%).
- Some 41% of businesses considered the current system supports the maintenance of food authenticity very well, while a further 17% said fairly well. Businesses with a quality

management team were more likely than others to say the current system supports them well in maintaining food authenticity (75% vs 22%).

Figure 5: Food Business Benchmarking Survey: Importance of the Inspections to Food Businesses (Qs7 and 9)



Base (all): 29 - Note for ability to export, 45% noted 'not applicable'

Food officers

Food officers were asked their opinion on how important the Food Law inspections were to Food Businesses.

On the whole, they considered the inspections were of value to businesses: 72% consider inspections were either very or fairly important with respect to maintaining food authenticity, to 92% considering inspections very or fairly important for export.

Notably, some 72% of officers considered the inspections very important to businesses in terms of food safety. (For comparison: some 45% of businesses said this was very important).

Just over half of officers recognise that ability to trade was a very important role for the Food Law inspections for businesses, whereas almost four fifths of businesses (79%) said this. Likewise, officers were much less likely to mention the importance of third party accreditation to businesses (36% said it was very important to businesses, compared with 69% of businesses).

Officers generally considered the current system to support Food officers well in their role: 21% felt it supported them very well and 56% fairly well in maintaining food safety.

Just under half of officers felt the current approach supports food authenticity (13% very well, 33% fairly well).

Around two-thirds of officers felt the current approach supports them with knowing their food businesses (15% very well, 54% fairly well); while around half of officers think it equips them to do their job (13 very well, 38% fairly well).

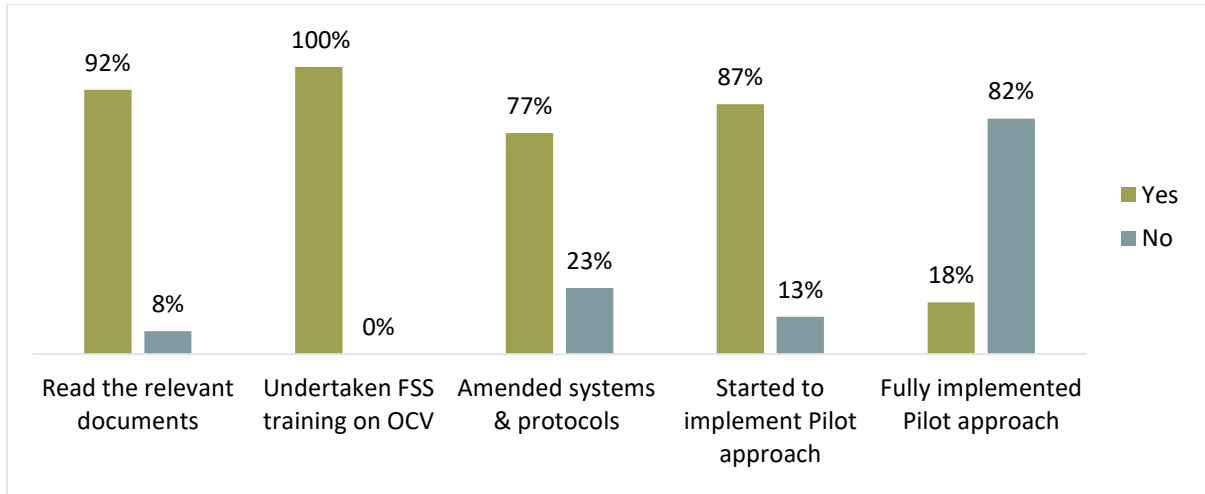
3.1.4 Early Implementation of the enhanced approach

Due to development work on the new system having been ongoing for a number of years the pilot authorities we asked what preparations they had made. The authorities involved in the Pilot had all begun to make some preparations for the Pilot at the time of completing the benchmarking survey (end March/April 2018).

All of the officers who would be undertaking official controls using the enhanced approach had undertaken the OCV training, and almost all (92%) have read the relevant documentation. Just over three quarters (77%) of CAs had undertaken some work to amend systems and protocols in preparation for the Pilot.

Over three quarters (87%) had started to implement the enhanced approach. This includes the 18% who said they had fully implemented the enhanced approach, covering three of the CAs. In all cases where the enhanced approach has been fully implemented, this has been for less than six months.

Figure 6: Food Officers Benchmarking Survey: Pilot approach implementation (Q9)



Base (all): 39

3.2 Preparation for the Pilot⁶

The Pilot was scheduled to run from late 2017 to the end of 2018. During this time, the Pilot authorities would be expected to develop an understanding of the new guidance materials; train all the staff who would be contributing to the Pilot; make changes necessary to internal systems and processes; and, of course, undertake the Pilot.

3.2.1 Staff organisation

Most authorities set up internal working groups to manage and oversee the Pilot typically towards the end of 2017. These met regularly throughout the Pilot (sometimes virtually) to plan the Pilot, discuss issues arising, share experiences and solutions, and so on. Typically at least one member of the internal group participated in national Pilot Working Group/Sub-Groups. Here information and knowledge was shared from the wider Pilot LAs. The authorities considered the formation of these groups in themselves an additional benefits to staff working on the Pilot.

Staff were selected to take part in the Pilot by a number of factors including:

- Eligibility for the official Control Verification (OCV) training. Participating staff generally had HACCP level 4. In a small number of cases staff completed the training specially; some had grandfather rights under the protocol;
- Mix of skills and experiences across the team. In the larger authorities, there was also a desire to ensure a spread across geographical areas;
- Opportunity for staff development;
- Fit with the Pilot businesses – in terms of specialism and location. In some cases the selection of businesses and staff was an iterative process, so that businesses and staff were a good match;
- In the smaller authorities staffing options were more limited, with participation often determined by skills and experience.

3.2.2 Selection of food businesses

Each authority determined which of its food businesses should be included in the Pilot. The criteria used to select the businesses included:

- Businesses due an inspection at an appropriate point within the Pilot timeframe: this was a guiding criteria, providing the 'pool' of businesses which could be included in the Pilot, and a rough timeline for their inspections;
- Ensuring a mix of sectors across the Pilot as a whole;
- Ensuring representation across the local authority – by geography and sector: to reflect EHO skills and experience and the nature and type of businesses in the area;
- Intervention-ready business (defined the CAs as a business already audited by SALSA, BRC, etc., so able to easily respond to the demands of the Pilot system): most authorities selected this type of business for inclusion in the Pilot.

⁶ This section of the report draws on evidence from the Post-inspection officers interviews

3.2.3 Documentation and systems

Authorities developed a familiarity with the OCV manual, together with the standard forms for documenting the system, during the planning phase. Across CAs there were two broad approaches to adoption of the standard forms:

- Some authorities adopted the forms largely ‘as was’ within the guidance manual, possibly (“topping and tailing” with the LA’s own branding.) Almost invariably these authorities found the forms in this format were not fit for purpose, cumbersome, and time-consuming to use.
- In some cases, the authority revised the forms:
 - to streamline the forms for the benefit of officers/FBs;
 - to facilitate use of handheld devices – to facilitate writing on-screen, embedding photographic evidence from the site, photos of live documents, and so on.

IT systems

Most authorities reviewed the capacity of their IT systems, but few made any changes in preparation for the Pilot. However, a number of issues were considered by authorities:

- One authority was concerned that food businesses would face problems uploading information data to their systems because of its security protocols. It therefore spent time developing a secure data sharing facility (Sharepoint) which allows businesses to upload and share information with the authority. This is a simpler solution than emailing files. This approach has now been shared with the other Pilot authorities, and may prove helpful as the Pilot rolls out.
- There was a GDPR-related concern, about the type of information held on CA systems; and so seeks to limit the type of information requested and held.
- One authority mentioned that improvements in case management systems will be required as the system is rolled out.

3.2.4 Training

All the authorities undertook the OCV training that was delivered in the early stages of the Pilot (this was a requirement of participating in the Pilot). Without exception, all considered the training to be of a very high standard. It was considered high quality, intensive and thorough; all officers who took part were very complimentary around delivery and content. For example, one said *“It was really intensive, the most intense training course I’ve ever been on. And it was just so completely different to anything we’ve ever done before getting right into the way you plan for inspections, and the way you think about how the process works”*. Advanced HACCP Level 4 or equivalent experience⁷ was a pre-requisite for the OCV course; notably those who undertook the OCV course with a Level 4 ‘equivalent’ typically found the OCV course particularly challenging.

Proposals for improvement were limited to expanding the range of examples/case studies to better reflect the profile of businesses across the country and developing models of delivery.

The training was identified as a positive force for change: in changing attitudes; and developing news skills, approaches and ways of working. Critically, in many authorities, the lessons from the training

⁷<https://www.foodstandards.gov.scot/publications-and-research/publications/approved-establishments-scottish-national-protocol>.

were being applied more widely within departments, impacting on the inspection of approved and manufacturing businesses across the authority.

3.2.5 Resource Impact

Authorities could not account precisely for the resource impact of preparing for the Pilot, although many said there had been an impact. In some cases, the broad estimates suggested were substantial:

- Generally the resource costs related to the staff time spent developing the Pilot at the local level, undertaking training, and participation in the national steering groups. However, (as noted above) there were clear benefits to much of this work, in terms of skills and knowledge development.
- There were some financial costs – in terms of the costs of training and IT development (one authority estimated these at c£12k). This comprised around £5k to bring 4 officers up to HACCP Level 4, £2k for OCV training for 4 officers, and £5k IT costs (provisional).
- It was noted by some authorities that, while IT systems had coped for the Pilot, were the new system to be rolled out across all approved and manufacturing premises, a review and development of IT would be required, resulting in costs for their systems. These authorities commented that, while their systems had coped with the requirements of the Pilot, they were unsure/doubted if they had the capacity to meet the demands of a full roll-out.
- A number of authorities noted that, while their IT systems (and staffing to a lesser extent) had coped with the demands of the Pilot, they may not cope were the system rolled out across all approved and manufacturing businesses. Increased resources would be required to enable authorities meet these information and staffing requirements.

3.3 Implementing the new system⁸

3.3.1 Document requests and preparation: officers

As part of the new system officers requested documentation from businesses before visiting the establishment. Typically they asked for the FSMS, traceability arrangements, product descriptions, and cleaning arrangements. Waste collection and disposal arrangements documents were the only type not to be requested for over half of inspections with officers requesting food safety management systems documents for almost all inspections.

There was some variation in the type and number of documents requested across the authorities:

- Some of the authorities requested all/most of the documents in advance of the inspections: one of the CAs requested all documents, one requested 13 out of the 14 listed documents, and one requested 12 of the 14 documents.
- In contrast in one of the CAs officers typically only requested around four of the documents prior to each inspection, with the documents requested varying by inspection – the authority interview noted that they tailored the information request to the business. They also timed the information request, depending on whether the first visit was to be announced (used to collate information) or unannounced (site inspection based on the information already provided).
- Some (3) officers mentioned that in some cases, they had only requested updates, rather than the full documents, since they had information from a previous inspection from businesses.

Officers noted that in approximately a quarter of cases (27%) food businesses had queries about the documents requested of them. These queries related to clarification (on documentation required /how far back records were needed, etc.), because of difficulties collating and sending the volume of documentation requested (both these aspects were mentioned in 5 Food Business queries) and to ask why it was necessary to provide customer details (3 queries).

In most cases (61%) the document requests did not require a reminder to be sent. In 9 cases (18%) a single document reminder was sent and in a further 9 cases, two reminders were sent. In one case, more than 5 reminders were sent. The average number of days taken to provide documents was 54.9.

In almost half of cases food businesses did not send all the information that was requested of them. The interviews confirmed that much of this was information that businesses were unable/unable easily to email/upload to the authority. Officers typically reviewed this information on site.

⁸ This section of the report draws on evidence from the Post-inspection Officers Interviews, the Post-inspection Food Business Interviews and the Officer Record Sheets

Table 5: Documents not sent (type)*	No. of inspections
Traceability arrangements for ingredients, packaging & final products	8
A description of the water supply	8
Waste collection & disposal arrangements	8
Arrangements for record keeping	7
Arrangements for applying the ID mark to product packaging or wrapping	7
Water supply quality testing arrangements	6
A description of the products to be produced	5
Arrangements for product testing	5
Equipment maintenance arrangements	5
Establishment, equipment & transport cleaning and disinfection arrangements	4
Detailed scale plan	4
Pest control arrangements	4
Arrangements for monitoring staff health	3
The food safety management system	2
Other	7

*Q18: Which documents were not provided?

Base (all) 51

Most authorities recorded spending more time than before engaging with the businesses on document collection. As well providing information about the Pilot process, this engagement provided an opportunity to provide information about the documentation requirements, and provide advice and support about the requirements. Some authorities considered this a useful investment in time – both in terms of the information provided, and in developing their relationship with their local businesses. For example, one officer noted on their record sheet that they expected the document collection to be a lot quicker next year, as the majority of the longer paperwork will have been done by that point.

In some cases additional support was required to enable document provision. Some authorities used electronic submission – with measures ranging from provisions of encrypted memory sticks through to the establishment of a secure download facility (Sharepoint). Some accommodated review from paper documents, by undertaking an additional (pre-) visit to access information on-site.

“We’ve gone to businesses with you know, secure memory sticks and got it from them that way. We’ve kind of worked round, so a little bit of hassle for them at the beginning to be able to give us all the food safety management system...” Officer

“It did take us a lot longer than before, and it took us longer probably than the resource calculation suggested it would. Again, we were looking at a lot of these businesses afresh or for the first time, so hopefully going back next year, the time to review the documentation will take much less time.” Officer

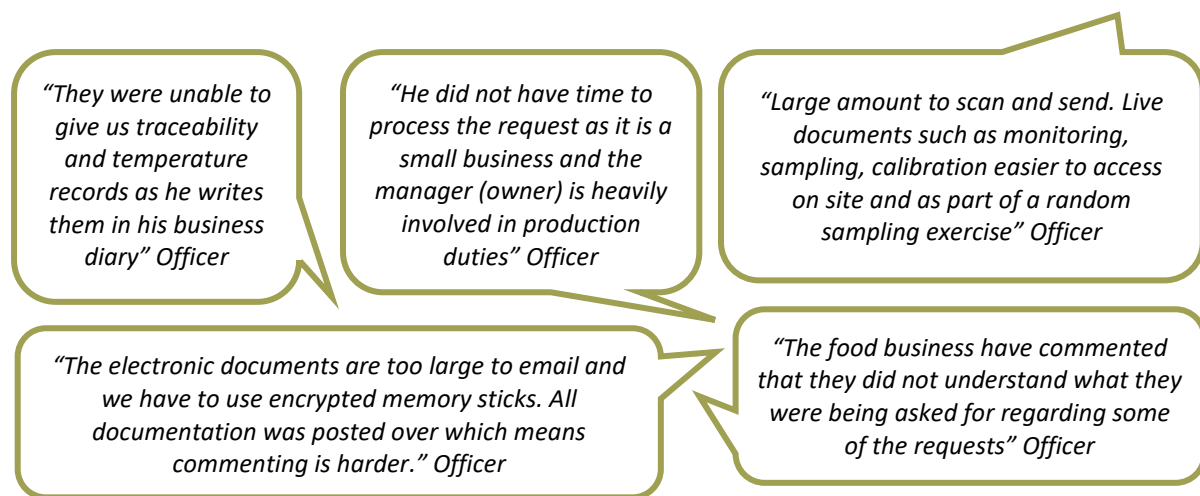
In some cases, there was additional administrative time to log documentation on return to the office where information was provided on-site – adding upwards of a day to each inspection.

The volume of information collected was considered, in some cases, onerous. A number of suggestions were brought forward to better manage this as the process moves forward, including:

- Introducing more flexibility into the data collection, so that authority specifies key data sets for each business/premises;
- Adopting a risk-based approach, which collects less information from low-risk premises/premises that are already subject to strict accreditation by an industry body;
- Collecting a set of core information, and then focus on updating this in following cycles.

Feedback showed that some difficulties were experienced by both food businesses and officers in sending and receiving documentation. When asked: What, if any, difficulties did you or the Food Business experience sending or receiving the necessary documents? (Q19) 35 comments mentioned issues relating to difficulties or delay. The main issues encountered related to:

- Enabling businesses to provide documents by email:
 - Files were too big;
 - Business data was in hard copy, so either needed to be scanned (see point below) or simply couldn't be sent electronically;
- Time required for businesses to provide the information – collating and emailing the listed documentation was time consuming. Smaller businesses, and those with staffing issues (sickness, holidays, vacancies), reported particular difficulties.



3.3.2 Document requirements: Food businesses

The shift to providing documentation to the officer in advance of the inspection was reported as a major change by the food businesses.

Food businesses noticed a significant increase in the time it takes them to collect the inspection documentation and to submit to the officer before the visits. Under the current system they had provided most/all of this information on-site, so there was little or no time requirement.

The businesses all collected the information they were asked to provide. However they did note a number of issues in being able to provide it to the authority:

- Format of the information – this applied especially to live data, which in some cases they collected as hard copy records on the floor/manufacturing line. These records needed to be scanned before being sent to the EHO. One business, who was asked for a year's worth of such records, mentioned spending a total of 6 days scanning the requested documents, so they could be emailed to the authority;
- Information being available, but laid out differently (e.g. daily figures rather than weekly, or shown by sub-groups not totals) as it was collected for a different purpose;
- Large data files, and not amenable to emailing. In some cases, the businesses held the required information electronically, but the files were either numerous, or very large. This was particularly the case in large, complex businesses; and in businesses that were accredited by an industry bodies (which meant the firm held detailed records).

Officers generally worked closely with the businesses to develop workable solutions.

- In some cases food businesses reached a compromise with the officer, whereby some or all of the information was reviewed on-site (requiring an extra “meeting”).
- One business has indexed all their information, and in future will just ask businesses to provide evidence of changes.

“All our records are held on paper and handwritten. We have live records on a daily basis. We couldn't spend two days in the post-office photocopying and scanning everything. Just not possible.

We spoke to them and they said they would just come and sit in our coffee shop and go through everything. Go through the paper files. So that's what they did. They sat for an entire day, and we brought them the all the folders, and they worked through them.” Business

“It wasn't a big job, but finding the time to do it wasn't easy.” Business

“Not a problem. Most of the information was already available electronically, so could be emailed. Some was in hard copy, so had to be scanned in first.” Business

“There wasn't anything missing as such. However, our information is collected to meet the audit and verification needs of our customers. These systems are designed to be “one size fits all” across the whole of the food manufacturing sector - it is not surprising that there is some lack of fit” Business

3.3.3 Planning for Visits

The new system is designed to enable officers to develop a plan for the OCV inspections. The research asked which, if any, tools/methods officers used to assist in planning the inspection cycle.

For most (90%) of inspection cycles at least one tool/method was used to assist the planning stage, with general preparatory research used in around two-thirds of the cycles, and a literature review in more than half the cycles. Inspections where officers did not use any planning tools/methods were more likely to be meat and poultry inspections (71% of meat and poultry inspections did not involve any planning tool use and only one out of 7 involved ‘research’). ‘Other’ tools used were ladders (mentioned by 2 officers), mind maps, spreadsheets, file and premises history records, open source research (web, local distribution etc.), sampling results, Specialist Cheesemaker CoP, and regulations checks (each mentioned by one person only).

Table 6: Planning tools/methods used by officers	Number	%
Research	34	67%
Literature Review	30	59%
Gantt charts	22	43%
Random sampling	14	27%
Concept maps	6	12%
PERT charts	4	8%
Statistics software	2	4%
Other	4	8%
None	5	10%
Q11: During the planning stage did you use any of the following tools?		

The document review did identify issues affecting the nature or scope of food businesses approval in 11 out of the 51 cases. Issues appear more likely to have been identified in cases where the cycle is not yet complete (9 vs 2) – however as the number of cases is very small, the difference is not statistically significant.

Further actions were required as a result of the document review in nine cases – again most of these cases relate to inspections that were incomplete at the end of the end of the evaluation (8 vs 1).

On average officers spent 3.9 days (FTE) on document review activities. There was no significant difference in the time spent on the businesses where the inspection cycle was complete/incomplete⁹ (3.7 versus 4.0 days). As discussed further below, this is substantially more than estimated in the Resource Calculation.

⁹ From discussions with CAs, we can assume the document review stage of the OCV system had been completed in almost all cases.

3.4 Official verification visits

3.4.1 Visits

The officer record sheets indicate a total 110 visits were made during the Pilot period. Just over half of these (59) relate to the 21 OCV official control that were completed within the Pilot period, the remaining 51 relate to the 30 OCV official controls that had not been completed.

On average, there were 2.2 visits per OCV official control cycle. Just looking at the completed pilot food businesses, there were 2.8 visits per OCV official control cycle, with the incompletes currently running at 1.7. It is possible once all the visits are completed the overall figure will be higher, as the incompletes may, at least in some cases, have included more time-consuming, risky processes, that require more attention.

On average 1.8 officers participated in each visit. In total the visits for each OCV official control cycle (in/complete) took an average of 3.0 days (FTE). There were, as might be expected, differences observed across records relating to complete and incomplete OCV official control cycle (3.7 days versus 2.4 days). We might therefore assume that **3.7 days** is a more reasonable estimate of the number of days spent on visits per inspection cycle and, for the reasons set out above, may be an under-estimate. As discussed further below, this is broadly in-line with estimates in the Resource Calculation.

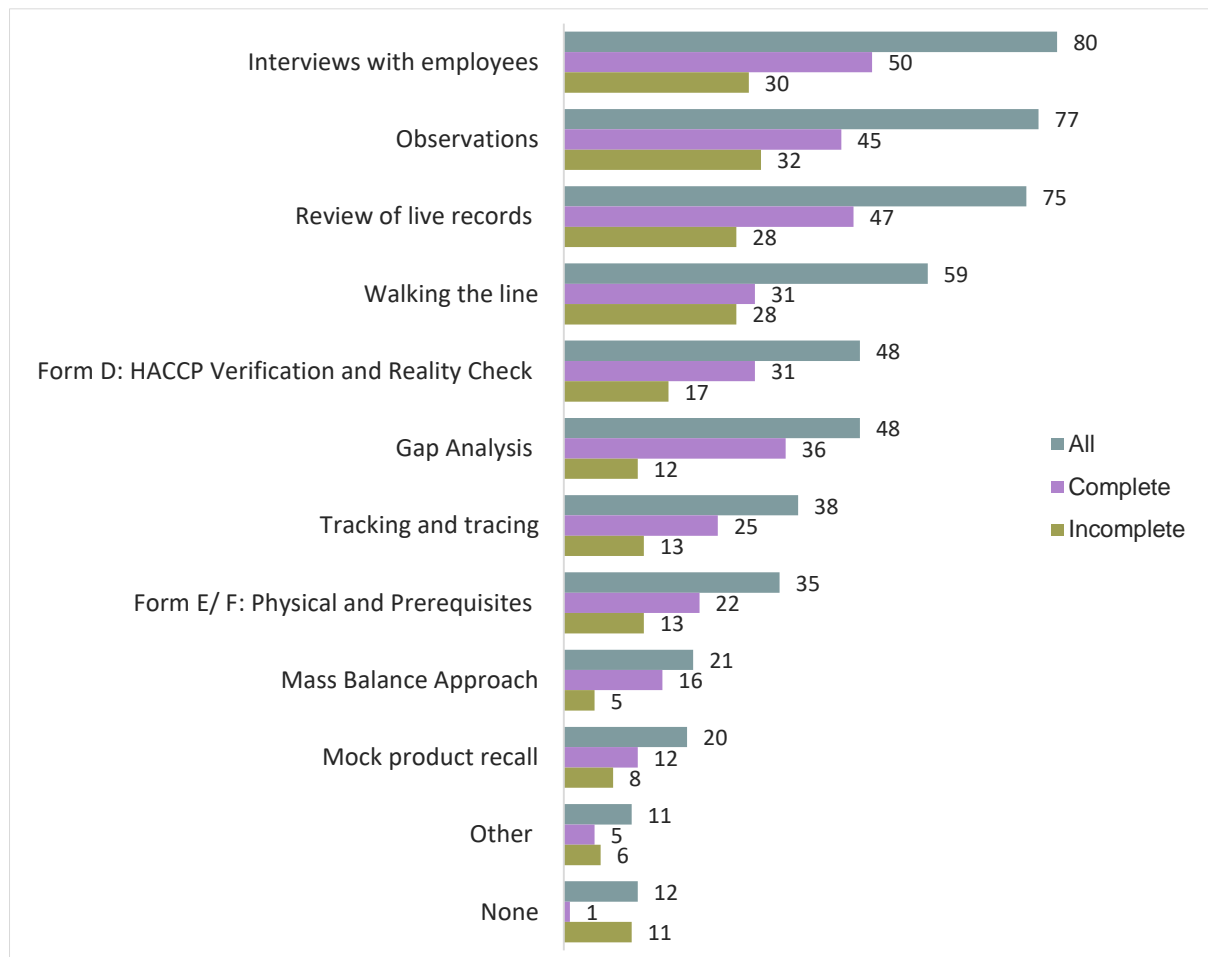
Visits had a high success rate in achieving their objectives. However, the visit objectives were not met in 13% of cases (14 visits): for example, one officer mentioned a planned unannounced visit to undertake a 'reality check' and interview staff members had been cancelled due to workload issues and time constraints.

Visits were most likely to result in informal action (in 52% of visits). "No action" was necessary after 39% of visits and "formal action" was taken after 9% of visits.

3.4.2 Tools, method and forms used during visits

The chart below shows which of the OCV tools/methods were used by officers during their visits. Across all the visits interviews with employees, observation, review of live records were the most common activities. The techniques listed towards the top of the table tended to be used during more than one visit, those at the bottom of the table less often (at a single visit or not at all).

Figure 7: Officer Record Sheet: Tools used during OCV (Q32)



Base (all visits): 110

Officers and authorities were particularly supportive of the triangulation/gap analysis approach – once the technique had been mastered, they found it intuitive, easy to apply, informative and valuable in the field/office.

“Triangulation preferred method of documenting inspection findings.” Officer

“I would not modify them [the tools/methods] and I think they are useful. I cannot think of any improvements at the moment.” Officer

“Tools generally okay, being modified as we go along and gain more experience of new system.” Officer

“Mass balance tool in particular work very effectively in this case.” Officer

OCV forms

Officers and authorities were overwhelmingly positive about the new system forms– they provided a real step-change in delivering an evidence-based, systematic, scientific approach to their work. Critical comments were, therefore, provided in the spirit of improving the approach/system.

There were several comments (10) that the forms, in the OCV manual, were too long to complete during visits. A number of strategies were being adopted, including;

- Pre-populating parts of the forms to make completion on-site easier;
- Identifying/managing duplication across the forms;
- Adapting processes depending on the type of visit or nature and size of the business being visited.

“Duplication of information on forms, require clarity of which form is essential at each stage as/some dubiety due to repetitive questions etc.” Officer

“Request HACCP documentation index to facilitate ease of HACCP review.” Officer

“Have already modified Forms D and E to better meet our needs” Officer

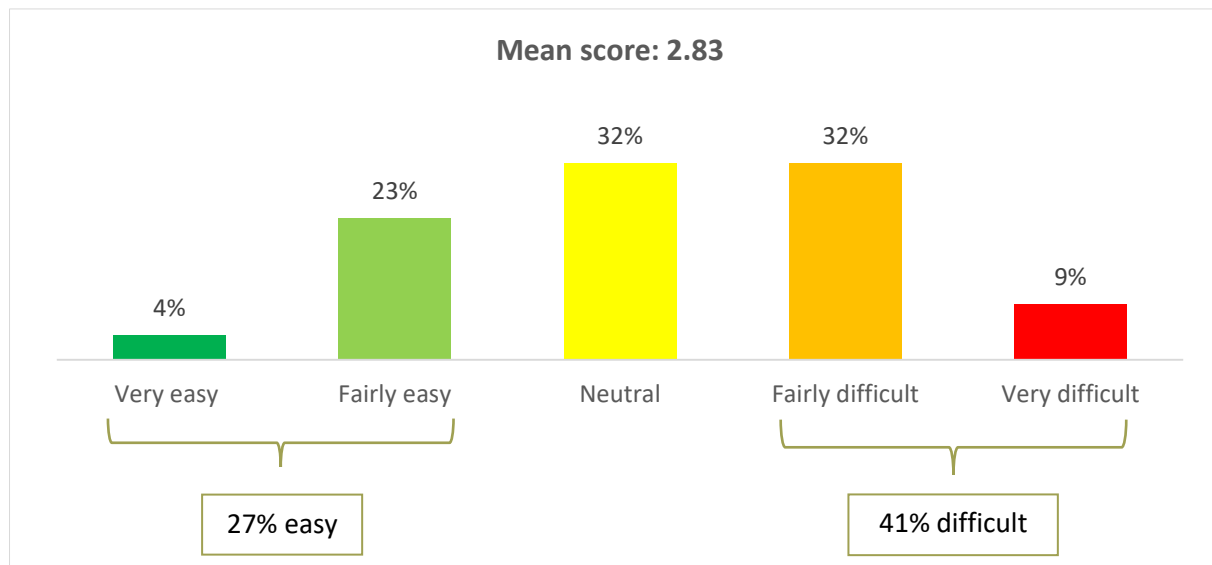
“Use form D only as checklist as far too cumbersome to complete for each PI” Officer

3.5 Implementation of OCV approach

3.5.1 Implementation the new approach – officers’ experience

Some 41% of officers found the OCV approach of food businesses submitting records ‘difficult’ to implement, while around a quarter (27%) of officers found it ‘easy’. The mean score (if we say very easy = 5...very difficult =1) was 2.83. Perhaps not surprisingly, the mean scores that relate to inspections that have completed the cycle was higher (3.24) than for those yet to complete (2.50); that is, officers tended to find it easier to implement the system in businesses that have completed the cycle than in those that have yet to complete.

Figure 8: Officer Record Sheet: Ease of implementing the new approach (Q40)



Base: 47

The types of support officers considered would assist them to implement the approach were reported as:

- Additional time to prepare and to implement the new approach – the most frequently mentioned comment (16);
- Improved support materials, particularly at the planning stage (12 comments), with key suggestions including a centralised database enabling access to research evidence (information included industry specific material, scientific evidence, case studies, information on specialist premises, access to other officers’ knowledge of processes etc.);
- Training requirements (10 comments), mainly around HACCP & OCV training, as well around specialist areas;
- Management commitment/support (8 comments) – often mentioned in relation the need for additional time;
- Improvements to processes and documentation – to streamline processes (4 comments);
- Improved networking and support for staff working on the OCV: suggestions included workshops (x 3), peer support networks to be able to share best practice (x 2) and additional staffing the support the process (x 3).

3.5.2 Implementation of the new approach – Businesses' experience

Businesses on the whole were comfortable with the implementation of the Pilot system. In particular, most businesses felt that the OCV approach gave officers had a much better understanding of their business. A small number of businesses said this had led to improved advice and guidance; however most businesses said there had been no difference in the advice or guidance received.

Businesses noted that the number of visits had increased. Most were accepting of this, although it did significantly increase their time commitment. As with the requirements for documentation preparation, businesses generally expected that the time required for OCV visits would diminish as the system bedded in.

Businesses were generally aware that the new type of visits was different from the previous approach – more detailed, systematic, and thorough. Several of the businesses commented that the officers focussed on procedures – and testing awareness and adherence to procedures – rather than evaluation of processes at the frontline.

*“The type of inspection was very different from before. As explained at the pre-meeting, they are following the gap analysis approach: they get information from me; research it themselves; then compare it with what is happening.”
Business*

“There was a lot of time spent assessing procedures - with each other, with the legislation and with practice on the floor. So the balance of the inspection time has shifted from the floor to the boardroom. They definitely did get a good feel for the business, especially from a technical side and from a procedural side.” Business

However, businesses were unsure as to whether all the extra time and effort had had much, if any, impact on them/their business. That is not to say the businesses had not received detailed feedback from the officers.

The businesses welcomed the feedback and ideas provided by the officers, but most mentioned that the points raised were generally no different to those being raised under the previous system.

Most were resigned to this extra time spent during the Pilot – they had been content to take part in the pilot, and appreciated as such this would involve a degree of learning curve. However, none of the businesses had identified any benefits as a consequence of the inspection. The additional time was, in their opinion, not yielding any additional gains. They were, therefore, very clear that they expected the additional time requirements, and in particular the burden of data provision to be substantially reduced if/when the system is rolled out across all businesses. This was particularly the case where the business was covered by one of the key industry accreditors (e.g. SALSA, BRC).

*“Does take up more of my time - about 2 days – for the actual inspection. I don't spend time preparing for them. Our paperwork has to be on point all the time. I'd be confident if they walked in tomorrow with what they'd see.”
Business*

“Definitely spent more time on the inspection overall. It's a Pilot scheme, so it's relevant to spend the time in year one. But if it were to continue, then it would be over the top. A week's worth of prep, then the inspections, then the follow-up... If things don't change as a result of the new approach, there's no need for all that work” Business

A number of benefits to the new system were identified by the businesses:

- **Officer knowledge:** Almost all the businesses mentioned that the main benefit was that officers had a much a much better understanding of the businesses. They had had more time to learn about the business and relevant processes, from the pre-visit document and research; and spent more time on-site during the OCV visits.
- **Approach:** Several businesses considered the “bite-size-chunks” approach to undertaking visits appropriate and beneficial – enabling officers to develop their understanding of the business, focus on key processes and information, and use their (and the businesses) time efficiently. However, the number of visits was considered excessive by some of the businesses – one business noted that a programme of three visits had been scheduled. While ultimately ‘just’ two had been required, he still felt this too many, given he was also accredited by a third party.
- **Contact:** Most of the businesses welcomed the opportunity to develop a better relationship with the officer.

3.6 Impact of the new approach

3.6.1 Resources

There was a clear view that the new approach increases the level of resource required to undertake approval official controls.

Resource Formula

The OCV system provides a systematic approach to estimating time requirements for the new approach. The officer records sheets indicated that, at the planning stage, officers estimated an average of 6.5 (FTE) days would be required for each OCV cycle, with the time broken down as shown on the table below. The estimates split broadly equally between preparation and time on-site.

Notably, there is no difference at the planning stage in the time estimates between the businesses that went on to complete/not complete within the Pilot period.

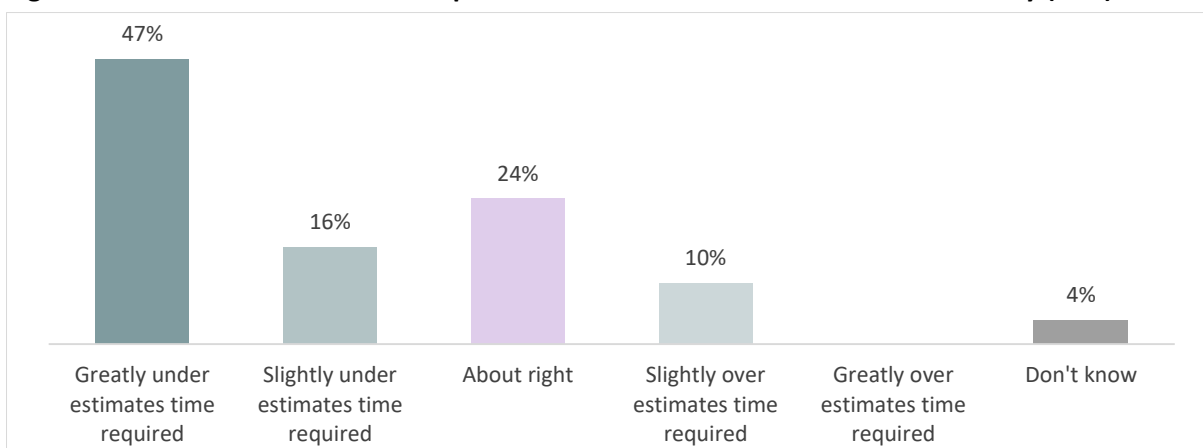
Table 10: Calculations of time required for completion using the Resource Formula calculation: Estimate of time needed (days - FTE): all records and by complete/incomplete inspection cycles

Inspection stage	Inspection cycle complete (ave no. days)	Inspection cycle incomplete (ave no. days)	All records (ave no. days)
Document Review time	1.5	1.4	1.5
Additional Document Review time	1.0	1.0	1.0
Onsite Official Control Verification time	2.4	2.4	2.4
Additional Onsite time	1.5	1.5	1.5
Factor for Absence of FSMS	0.0	0.1	0.1
Additional factor for number of employees	0.8	0.5	0.6
Total inspection time	6.6	6.4	6.5

Q9: Referring to the Resource Formula calculation (see p81 of the OCV document) how long do you estimate you will spend on each stage of the inspection?

Approximately a quarter of officers considered that the Resource Formula provided a realistic estimate of the time that would be needed for each OCV cycle. However, most (63%) considered it to be an under-estimation (either 'slight' or 'great') and none thought the time estimate reached using the formula greatly overestimated the actual time needed.

Figure 9: Officer Record Sheet: Perceptions of Resource Formula calculation accuracy (Q10)



Base (all) 51

Further, the Resource Formula appears to be more accurate for the pilot OCV cycles that were completed (43% were considered to be about right), and less accurate for those that did not complete during the Pilot (just 10% were considered about right).

Adopting a team approach

Several authorities implemented the OCV system using a team approach to undertaking official controls. In particular, there appeared to be an understanding that tasks should be undertaken by pairs of staff working together. This clearly had an impact on staff resources.

However, the authorities appreciated the benefits that doubling-up brought to their practice:

- Especially for large, complex and/or high risk premises;
- To promote knowledge and skill sharing/training.

One authority had taken a team approach for all pilot businesses – each premises had a lead and second officer. The interviewee noted that the lead inspections officer undertook the main duties; while the second officer participated in the physical visits. This also offered a second pair of eyes during the HACCP/document review stage.

Not all authorities were able to adopt a team approach to the OCV. Key constraints were:

- Lack of staffing appropriate resource – too few staff with OCV training, although some looked to take on the opportunity to include staff working towards HACCP4/OCV training in a secondary role;
- Linked to this: geography, with small, rural authorities most resource limited, and unable accommodate doubling up, despite recognising the value it would bring to the process.

It was noted that some authorities had not taken this team approach into account in the Pilot resource calculations (it is not a requirement of the system). The guidance and/or training may need to be amended to clarify how the calculation is used to accommodate different ways of working.

3.6.2 Impact on compliance¹⁰

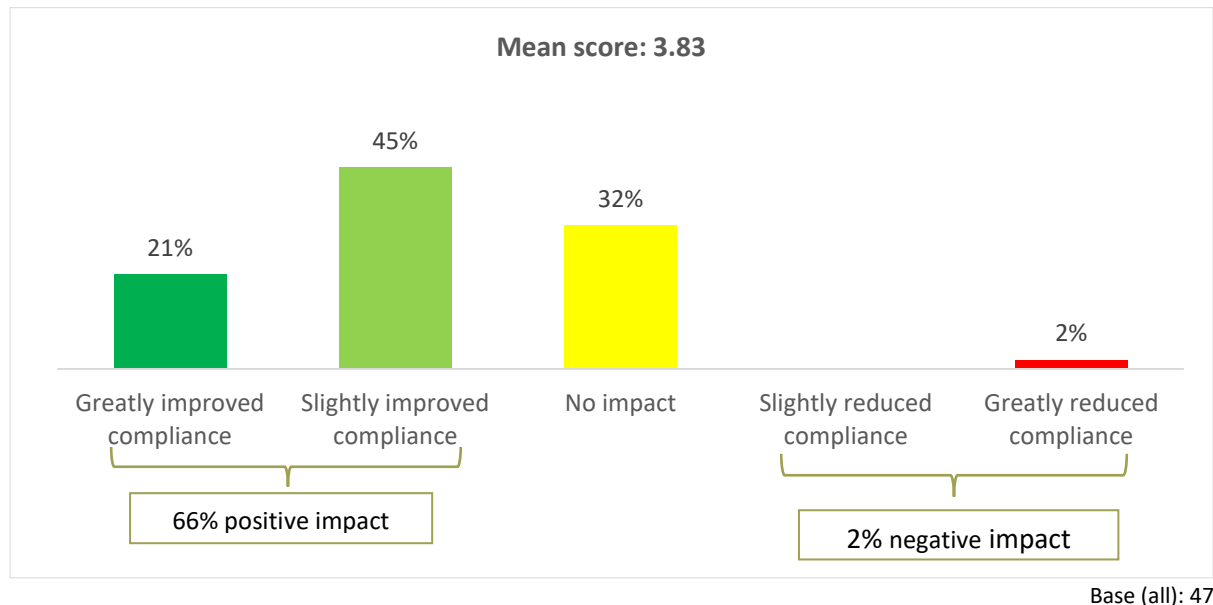
Impact on food safety and standards: Officer Perspective

Officers considered the OCV approach would have improved compliance in most (66%) of the Pilot businesses. Officers reported that OCV had resulted in a slight improvement in compliance in 45% of businesses, and greatly improved compliance in 21% of businesses. In around a third businesses there would be no change; and just 2% (one case) there would be a deterioration in compliance¹¹. Officers stressed, that in many cases the businesses being inspected were already of a high standard; therefore the new system may not have scope to identify non-compliance/only have scope to identify to minor instances of non-compliance.

¹⁰ This section of the report draws on evidence from the Post-inspection Officers Interviews, the Post-inspection Food Business Interviews and the Officer Record Sheets

¹¹ The officer provided no further details on why compliance deteriorated in this case.

Figure 10: Officer Record Sheet: Impact of the enhanced approach on Food Business’s compliance (Q42)



Officers highlighted that visits are now much more detailed. This means that officers understanding of the business is greatly enhanced, enabling them to provide advice and support, and to identify areas of non-compliance.

Critically, the new system had improved their wider relationships with Businesses.

“I better understand the business and their practices, and can give the business better advice. The inspections are also shorter but more frequent which means we have better communications” Officer

“The FBO recognises the importance of having a live management system, and why it needs to be maintained, how the system supports him, and it shows that he remains in control of his product.” Officer

“Much more detailed inspection which is highlighting issues which have been missed previously “Officer

“FBO has taken on board where faults have been identified in his system. In reality has become aware that he is less likely to get away with noncompliance, as tools used such as mass balance and traceability highlight noncompliance much more effectively.” Officer

Impact on food safety and standards: CA Perspective

The CAs reported that the Pilot system had the potential to impact positively on food safety, although none was able to measure these impacts quantitatively. They pointed to their increased understanding and time spent with each of the businesses as critical factors in delivering this. Of particular relevance was the ongoing relationship with the businesses, the new approach of multiple visits over throughout the cycle supported a sustained deeper understanding of the business.

However, views were more mixed with respect to the impact of the new system on food standards. All considered the system has the potential to be positive – in particular with respect to the tools available to assess food standards, relationships and frequency of inspections, enabling officers to keep on top of the new the products. However, most felt much more work was needed to deliver significant impacts in this area.

“Yes, very much so. Because of the depth of what we’re doing, the fact we’re going more frequently so we’re keeping up to date with things with them, we’ve got this ongoing relationship with them, so we hope that means they’ll come to us and talk to us about issues.” Officer

“We may be picking up issues, more detailed HACCP points than what we were previously. You may not identify that actually a business is more or less compliant than you thought it was a year ago. From a local authority point of view, we probably have more evidence to say that it is compliant than what we did before. Or on the other hand, when we feel a business is non-compliant, the tools allow us to evidence the non-compliance letter more easily.” Officer

“I think it’s really opened our eyes to how much we were missing, before. We really weren’t giving it the scrutiny that it deserves. Certainly in terms of things like provenance, and authenticity, we’ve given that a lot more attention as well. Finding a lot more, in terms of that - the labelling, control of allergens and thing like that.” Officer

“I think it’s just started to scratch the surface of that [compliance with food standards]. There’s more work needs to be done, I think we’re only just really beginning to come round to doing that properly.” Officer

Impact on food safety and standards: Business perspective

Businesses were less likely than officials to attribute positive impacts to the Pilot system. All were supportive of the inspection process and considered the detailed inspection process would contribute to ensuring food safety was maintained.

However, they noted that that the inspection reports from the Food officers were similar to those under the previous system, and that the type and level of non-compliances identified were similar (minimal). It was also noted that advice provided by the officers during and after the visits was of limited value, but some thought this might improve as officers’ understanding of the sectors/ individual businesses grew as the new system bedded in.

Many noted that large businesses tend to be covered by industry accreditation schemes, which tend to work to a higher standard than the OCV system. They felt that these played a greater role in securing food safety and authenticity standards across the relevant industries. However, most stressed that the Pilot system will be important in managing food safety (but possibly not authenticity, without further development) in the small, high risk businesses, which are not accredited by organisations like BRC and SALSA.

"The new system won't affect our standards of food safety. It may impact on other businesses that don't have external accreditors coming in anyway." Business

"Increase confidence in food safety. Inspection was very in-depth. Like the BRC, It goes though all your procedures and processes." Business

"Confidence in food safety probably going to increase. You can see these guys are looking at your processes. They can see you are doing things properly." Business

"Impact on food standards? No change for us. For us, the impact will come from SALSA which has introduced changes in its standard." Business

"That's hard to say - the focus [of OCV] is on food safety, so I'm not sure they can say much about authenticity.... There's not even a standard about it. It [food standards guidance/method] is different everywhere you go, there's no consistency." Business

4. Summary and conclusions

4.1 Fit for purpose

The authorities working with the new system were on the whole enthusiastic about the approach and motivated to roll the system out across their approved (and eventually manufacturing) businesses. It was generally considered superior to the previous system: because it is systematic, evidence-based and logical.

It was appreciated that the system would benefit from some revision to enable it to be adopted and to enable businesses to better respond to its requirements. These modifications principally related to:

- The forms used to collect data from businesses;
- The ways in which information is collected from businesses: how much, and in which format;
- The evidence available to officers during the planning stage;
- The documentation officers used to record information during inspection visits;
- Competent Authority IT systems;
- Review of the resource formula calculation, so that it better reflects the officer time/other resources required.

4.2 Impact of the new system on businesses

Businesses were generally comfortable with the implementation of the Pilot system. They felt that Food officers had a much better understanding of their business than previously: in some cases this had led to improved advice and guidance, while in other cases there had been no perceptible difference. Notably, some businesses appreciated the opportunity to develop an improved relationship with the Food officer.

The OCV system increased the time commitment on businesses, both in terms of document/data preparation and the number of visits.

- **Documents:** There has been little/no change in the information required from businesses, but under the old system officers accessed most/all of the required information on-site, so there was little or no time requirement from businesses. Under the new system, the businesses have to provide the required information before the first visit, which can be a substantial task. In some cases officers have put in place solutions to mitigate these problems, including accessing files on-site.
- **Visits:** The number of visits has increased, and in many cases the time spent at each visit is not significantly shorter than before. As a consequence, the overall time spent on visits is a great deal longer. Most businesses accepted this.

Overall, businesses were spending significantly longer on the inspection cycle than previously. Businesses reported improved relationships with the Food officer, but no impacts on food safety of standards. There was a commonly held view that the increase in time requirements resulted from the 'Pilot' not the new system itself, and there was a clear expectation that in subsequent cycles these time requirements would reduce substantially.

4.3 Impact of the new system on CAs

On the whole, the Competent Authorities were supportive of the OCV approach; it represented a positive step-change in the way they undertook approvals, and many of them had developed substantive changes to their working practices.

A number of key points were raised:

- **OCV forms:** Officers welcomed the robust, systematic, evidence-based approach. However, there were real concerns that the documentation underpinning the approach was excessive: there were too many forms, some information was duplicated across forms, the forms did not easily support electronic media, and they did not always fit well with local systems. There were also concerns that in some cases they were ‘one-size-fits-all’, and lack the flexibility to reflect key requirements of specific industries.
- **Training:** The training was identified as a positive force for change: in changing attitudes; and developing new skills, approaches and ways of working. Advanced HACCP Level 4 was considered essential for undertaking the OCV training.

Critically, in many authorities, the lessons from the training were being applied more widely within departments, impacting on the official controls in approved and manufacturing businesses across the authority.

- **Organisation:** Most authorities set up working groups to oversee the Pilot – these met regularly throughout the Pilot (sometimes virtually). The formation of these groups in themselves – knowledge sharing, etc. – conveyed additional benefits to staff working on the Pilot, and provided a forum to share information from the national Working Group.
- **IT systems:** Most authorities reviewed their IT systems, but few made any changes in response to the Pilot. However, some authorities indicated that while their systems had coped with Pilot, they may not cope once the OCV approach is rolled out. Clearly, the ‘burden’ may not be as great as suspected, if further work is undertaken to review data requirements, options for data provision (including on-site, Sharepoint, etc.). Nonetheless, a key issue may be the extent to which authorities will be able to support the data requirements as the OCV approach is implemented.
- **Staffing:** All the CAs reported the OCV system to be resource-intensive: they considered they were spending much more time on tasks such as document review, document administration (logging documents received from businesses), the number of visits required, and team working. They reported spending much more time on these tasks than under the previous system, and more time than they had anticipated at the start of the Pilot¹².

¹² The inspection cycle took around a day under the previous system; using the RFC officers thought it would take about 6.5 days for an OCV cycle; the officer record sheets suggest it takes about 8 days to complete the cycle. This may be under-estimate as the Inspection Cycles that have been completed are possibly the more straightforward.

All of the authorities saw value in the extra time spent: a much deeper understanding and knowledge, a more systematic, evidenced assessment of processes, and opportunities to identify non-compliance.

Most noted there had been opportunity costs as a consequence of undertaking the Pilot – the number of inspections undertaken during the course of the year had been reduced, officers' workloads had been reallocated to accommodate working on the Pilot (and away from other work), and so on.

- **Resources:** There was a significant resource impact. Authorities identified only minimal “real costs” – in relation to the costs of training and IT development. However, it was also noted by some that introducing OCV across the authority could/would have resource impacts in these areas. The same would apply in relation to staffing resources.

The resource impacts of the new system were greater than had been anticipated. To some extent, it is appreciated this is a function of being a pilot; and time requirements might reasonably be expected to reduce over time as officers become more familiar and experienced with the new system. Nonetheless, further work may be required to review the resource planning approach, to ensure it fully accommodates the additional work required by new working practices.

4.4 Increased confidence in food safety and food standards

The evaluation did not evaluate impact on compliance. Instead, it collected the views of officers and businesses on impact of the new system.

Officers were confident that the OCV system would have a positive impact on food business compliance. It was appreciated that in some cases, businesses were already operating to a high standard of food safety, and in these cases the OCV system had little opportunity to make improvements – but across the board, the system ensured officers had an in-depth understanding of business processes.

Officer views were more mixed with respect to food standards. Some authorities were comfortable and confident applying the OCV system to improving food authenticity, while some felt there was more work to be done in this area.

The food businesses interviewed were less likely to see additional compliance benefits from the OCV approach. However, most qualified this and commented that other businesses – those not accredited by an industry body, for example¹³ – would benefit from being audited under the OCV system.

¹³ Notably, almost all (90%) of the businesses in the baseline survey said that third party accreditation was important to the business: 69% said it was very important, and a further 21% said was fairly important. This is similar to those saying that the food law inspection was important to their business being able to trade (86%) 79% said it was very important, and a further 7% fairly important (Qs7/9).

4.5 Recommendations

If the OCV system is moving forward we would recommend the following:

- Review documentation and OCV forms so as to streamline the document/data requested from businesses and the information officers record during visits.
- Review how businesses provide information: ensure that appropriate systems are in place to collect the required information. This may, at least in the early rounds, include supporting businesses to provide the information, and reviewing information on-site.
- Linked to this, review authorities' IT systems/capacity to cope with OCV data requirements.
- Assess the impact of the changes in document provision on businesses. Provision of documentation and data prior to the OCV visit was a shift change for businesses, and one that many within the Pilot found a substantial challenge. The Pilot focused on largely 'audit-ready' businesses. Even after work has been done to streamline the data requests and provide support, it is possible businesses will find the task onerous. Further work to assess the impact of the OCV approach on businesses, and to consider measures to minimise adverse impacts might therefore be warranted.
- Clarify role for team working – a number of the Pilot authorities understood this was a requirement of the system and found it a beneficial approach. The working group may wish to further review how and where team working could be used within the OCV system, and assess the associated resource implications. Where team/paired working is recommended for all/some of the OCV system (based on the stage/type of business), this should be reflected in the resource calculation.
- Put in place resources to support officers delivering the OCV system. These are likely to include:
 - A repository of up-to-date research evidence, to support the analysis stages;
 - Peer support to enable knowledge transfer and shared learning.
- Maintain an ongoing OCV training programme, to ensure appropriately trained officers to staff the OCV system. We would strongly recommend that all officers are required to have advanced Level 4 before undertaking the OCV training.
- Clarify the OCV guidance with respect to food standards, and strengthen where necessary. Both businesses and, to a lesser extent, officers, found it difficult to clearly express the OCV approach with respect to improving food standards.

Appendices

[Separate volume]