

# FSA 22-06-18 - Veterinary Resourcing Update

This paper provides an update on the latest developments in relation to the provision of Official Controls (OCs) in abattoirs in England and Wales and the work underway to prevent service disruptions in the food chain and risks to both food safety and animal health and welfare.

Report by Junior Johnson.

## 1. Introduction

1.1 This paper provides an update on the latest developments in relation to the provision of Official Controls (OCs) in abattoirs in England and Wales and the work underway to prevent service disruptions in the food chain and risks to both food safety and animal health and welfare.

This is against a backdrop of overall resource shortages in the veterinary profession. The work in this area can be grouped into three main areas of activity, all with significant inter-dependencies. These are:

- Financial negotiations with our Service Delivery Partner.
- Our move to a partially insourced resource model.
- Temporary Registration of Novice Official Veterinarians by the Royal College of Veterinary Surgeons.

1.2 The Board is asked to:

- Note and comment on the progress in each of these key areas of work.
- Comment on the extent to which this work mitigates the risks to service delivery.

## 2. Background

2.1 The FSA delivers Official Controls in abattoirs and the regulations require an Official Veterinarian (OV) to be present during processing. The OV's work is vital in monitoring and assuring food safety and animal health and welfare and underpins international trade in products of animal origin.

2.2 The FSA has a contract with a Service Delivery Partner (SDP) to provide almost all abattoir OVs in England and Wales. The SDP currently employs around 95% of their OVs from overseas due to there being insufficient capacity within the UK veterinary profession and the job being perceived as less attractive than other veterinary work. Covid-19, EU Exit, and other resourcing challenges have created a recruitment crisis in the UK veterinary sector, significantly impacting the availability of veterinarians in all sectors of the profession.

2.3 The FSA's Corporate Risk Register includes the risk of FSA "failing to deliver Official Controls we are directly responsible for due to a heavy reliance on others including the Service Delivery Partner". Furthermore, it states that, "over the last few years, the political and economic climate has had an increasingly adverse effect on the ability of the SDP to recruit and retain contractors. The SDP employs all of the Official Veterinarians required to deliver OCs in

abattoirs, and approximately 60% of the overall Meat Hygiene Inspectors. Therefore, if the SDP were to fail to deliver, it would have a catastrophic effect on the FSA.”

2.4 The Royal College of Veterinary Surgeons (RCVS) is the statutory body and regulator of veterinary surgeons in the UK and only veterinarians registered with the RCVS can practice as vets in the UK. To register with the RCVS, veterinarians need to have completed either a degree recognised by the RCVS or passed a statutory examination.

2.5 Prior to the end of the EU Exit Transition Period, veterinarians from EU Member States benefitted from automatic mutual recognition of professional qualifications and did not have to meet a specific language requirement. At the end of the transition period, the RCVS started to recognise European Association of Establishments for Veterinary Education (EAEVE) accredited veterinary degrees rather than Veterinary Schools from EU countries and apply Level 7 English language requirements for those vets who are not taught in English. This has made recruitment much more challenging as most of these vets hold up to Level 5 English. The FSA has therefore worked with the RCVS to apply their Temporary Registration scheme for these roles which is discussed in more detail later in this paper.

2.6 During the Covid-19 pandemic and since the end of the EU Exit transition period, demand on the veterinary profession has intensified. For example, pet ownership has increased rapidly, and consignments of products of animal origin placed on the NI market from GB (unless exempt under the current Standstill arrangements) or exported to EU now require OV's, authorised by the Animal and Plant Health Agency, to deliver Export Health Certification. These demands have in turn pushed up salaries and, along with the overall decline in the number of vets arriving from the EU, have impacted the SDP's ability to recruit and retain veterinary staff. Further data on the numbers of vets registering with the RCVS can be seen in Appendix 1.

### **3. Negotiations with our Service Delivery Partner**

3.1 The impact of the changes in the wider veterinary market outlined above has led to an increase in the cost of providing the FSA Delivery of Official Controls (FSADOC) service. The changes were not forecast in any of the bids from the marketplace at tender stage, as neither the impact of EU Exit nor the onset of the Covid-19 pandemic were known.

3.2 Without this variation agreement, the risk of service delivery failure would have remained unacceptably high. Such service failure would severely impact the meat industry causing disruption to production, increase food safety and animal welfare risks and pose a reputational risk to the FSA. The additional funding therefore represents value for money to mitigate this critical risk.

3.3 As part of the due diligence performed on the contract variations, we have independent assurance provided by an external consultancy that the additional funding will directly support the increased recruitment and retention costs. In addition, as part of the agreement, the SDP will actively support the FSA's move to a new resourcing model, which is a strategic priority and focuses initially on directly employing around 25% of OV roles by April 2023.

### **4. Direct employment of Official Veterinarians**

4.1 As referenced in the Chief Executive's Report at the March 2022 Business Committee, FSA is planning to directly employ 25% of OV's by April 2023, with an ambition to increase this further, subject to incorporating any lessons learned and completion of further feasibility studies. This will support delivery of a more flexible, sustainable, and resilient approach to recruiting, managing, and maintaining the OV workforce and aims to increase the attractiveness of the OV role within the recruitment market, both in the UK and internationally.

4.2 A modified operating model has been developed to facilitate the direct employment of OVs, underpinned by a set of design principles which include:

- FSA OV resource should be built to support long-term sustainability, flexibility, and resilience of service delivery, with the ability to respond quickly and effectively to short term changes in Food Business Operator (FBO) operating requirements
- FSA OVs should be recruited and trained to cover all aspects of OV service delivery
- Future outsource contracts will ensure that the SDP is able to provide cover for the directly employed OV cohort when absences occur due to planned leave, training or other deployment and short notice absences.

4.3 Our Field Operations Division are currently considering the locations in which the directly employed OVs will be deployed to ensure a smooth transition and minimal disruption to services. It is anticipated that a Transfer of Undertakings (Protection of Employment) also known as TUPE will apply, and that some SDP OVs will transfer to the FSA by April 2023. The number of staff transferring will be dependent on the agreed locations and the way in which our SDP organises their employees. Field Operations are also developing the OV management structure to ensure that FSA OVs have the required level of support and supervision in place.

4.4 In addition, HR colleagues are planning to design and run an OV recruitment campaign, with the ambition of generating reserve lists from which future appointments can be made once the number likely to transfer via TUPE is confirmed. This will also allow FSA to undertake some early market testing for both domestic and targeted international recruitment. Work is underway to agree a set of OV terms and conditions that provide a balance between attracting applicants (competitive salary, flexible working, pension, career development, onboarding support) and ensuring the appropriate resilience and flexibility that our operating model requires. HR colleagues have also submitted a business case to Cabinet Office to seek bulk approval for an Alien Exemption Certificate for candidates who do not meet the civil service nationality rules. A bulk approval will significantly speed up the recruitment and onboarding process.

4.5 The project team have set up a dedicated stakeholder engagement workstream to deliver targeted engagement with key stakeholders both externally and internally. Industry bodies have been broadly supportive of our ambition to move more towards direct employment, and we will continue to engage constructively with them over the coming months as more details are agreed. We are planning integrated communications to industry, our staff, and other important stakeholders which we expect to take place in early to mid-July.

## **5. RCVS and Temporary Registration**

5.1 To support the recruitment of OVs, the RCVS agreed to a joint Defra/FSA proposal to enable veterinarians with degrees recognised by the RCVS, and who have achieved the International English Language Testing System (IELTS) level 5 English standard, to temporarily register (TR) and work as a Novice Official Veterinarian (NOV). IELTS is an internationally recognised qualification for the English language. This allows them to undertake a restricted range of Official Control duties with appropriate support and supervision, whilst further developing their English language skills. This was triggered on 1 June 2021 and the first Temporarily Registered Novice Official Veterinarians (TRNOVs) were deployed to abattoirs in August 2021.

5.2 The proposal outlined that an individual's TR would last for 12 months, with the possibility of an extension of six months, during which time the temporary registrant would be expected to reach the IELTS level 7 English standard.

5.3 A review of the TR scheme was completed and presented to RCVS in December 2021. The FSA was able to reassure the RCVS that the scheme was working as intended and TRNOVs were relieving pressure on the system and helping to maintain the food supply chain. A

further update on progress was given to RCVS on 31 March 2022.

#### Current situation

5.4 The FSA SDP OV numbers declined considerably between February 2021 and November 2021 to 20% below optimum levels, putting FSA service delivery at risk. From August 2021, thanks to Temporary Registration, OV numbers have steadily increased and reached the level required to provide full-service delivery with only minimal use of contingency measures in April 2022.

5.5 As of 29 April 2022, 100 vets have applied for TR with the RCVS and 83 have already been deployed to abattoirs in England and Wales making up 32% of our front line OVs. The SDP reports that 77% of all TRNOVs are on track to achieve the IELTS level 7 English standard in the first 12 months, with 4 who have already achieved this and moved to full registration with the RCVS.

5.6 Those TRNOVs have been successfully supported in their operational function by both the FSA and the FSA's SDP through robust management and assurance processes to ensure performance and standards in the delivery of Official Controls.

5.7 The SDP expects to submit a further 31 TR applications by 31 May 2022, and this is forecasted to bring OV capacity to optimum levels at that point, ensuring full and ongoing service delivery without the need for any contingency measures. However, the challenges of recruitment and retention across the whole veterinary profession show no signs of stabilising and TR remains the most effective contingency and mitigation to delivering OV-led Official Controls and managing recruitment and retention issues in the short-term.

#### Next Steps

5.8 Acceptance of new entrants to the TR scheme is scheduled to come to an end on 31 May 2022. FSA will discuss our plans to move away from a reliance on this contingency measure at the RCVS Council meeting on 9 June 2022, through a proportionate and measured exit strategy, which includes a request for the TR scheme to be continued whilst these initiatives are implemented. They include:

- FSA directly employing OVs (up to 25% by April 2023)
- Initiatives to attract and retain vets in the abattoir OV role:
  - Funding to improve pay and conditions for the OV role
  - Role variation, flexible contracts, and clear career progression routes
  - Further engagement with UK vet schools to promote roles in Government Veterinary Services
  - Development of a graduate programme for recent veterinary graduates wishing to become government vets
- The work of the Operational Transformation Programme supporting OVs to focus on veterinary activities and further developing the role of Meat Hygiene Inspectors (MHI),
- Developing recruitment campaigns in the UK and overseas, including working with overseas universities to encourage formal English language development alongside veterinary degrees.

5.9 We will present our case to the RCVS on 9 June, highlighting the importance of the TR scheme and outlining potential risks to the whole veterinary profession resourcing chain, where FSA OVs deliver a relatively small but vital part of the agri-food chain. It is important to note that if TR ceases from June, we will not experience an immediate negative impact on OV resource and service delivery. We would expect to see a gradual decline of OV numbers influenced by natural attrition and disruption to the recruitment pipeline, with numbers falling to critical levels by January 2023 without other actions.

5.10 In that event, the FSA will also progress and implement emergency contingency measures which include:

- Reviewing the potential route to employ overseas vets as MHIs allowing vets, with degrees recognised by the RCVS, to work as MHIs until they achieve IELTS level 7 English standard and can register with the RCVS.
- Utilising the contingency options deployed during FSA's emergency response to the Covid-19 pandemic, primarily the use of FSA veterinary staff, and SDP veterinary management staff to work as OV's in abattoirs.
- Considering the acceleration of the direct employment of OV's into the FSA.

5.11 In the short and medium term none of these contingencies will be as effective in supporting and increasing OV capacity as the TR scheme. If the resource pressures in the profession remain as serious as they are, we could soon return to the conditions that resulted in the triggering of TR in June 2021.

## 6. Summary

6.1 This paper describes the key activities that are underway to help FSA to address the significant challenges posed by veterinary resourcing in a professional landscape that, whilst traditionally complex, has become even more so with recent domestic and international developments.

6.2 The OV role is, and will remain, critical for the FSA in continuing to deliver its regulatory responsibilities and it is essential that we do everything possible to secure resources in this area in the short, medium, and long term.

6.3 The Board is asked to:

- Note and comment on the progress in each of these key areas of work
- Comment on the extent to which this work mitigates the risks to service delivery

## Annex 1

Resource challenges have been exacerbated because fewer veterinarians, particularly EU graduates, are registering in the UK and there is a gap between the numbers of UK graduates and the wider resource demands of the profession.

This is most apparent by looking at 2018, when 1,159 new UK-practising registrants had qualified in the EU, whereas in the year to November 2021, only 239 EU graduates had registered with the RCVS.

The number of registrants from the UK has increased slightly since 2018 (from 810 in 2018, to 998 in 2020, and 948 in 2021), but not by enough to make up the large shortfall left by overseas registrants.

This graph shows how the proportions of UK, EU and other overseas graduates registering with the RCVS has changed since 1980 and is extracted from the Nov 2021 RCVS report - [Recruitment, retention and return in the veterinary profession](#)

Note the % changes reflect the proportion of UK, EU and Rest of the World graduates registering with the RCVS but do not reflect the absolute number of registrants which has decreased (as above).