3. PIA system

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

3.2 Legislation
Chapter III A (a) of Regulation (EC) 854/2004 states:

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

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

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

3.3 Assessment arrangements

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

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

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

3.4.1 Head of Field Operations / Operations Head Veterinarian
The Head of Field Operations is the owner of this process with the Operational Head Veterinarian having the ultimate responsibility for all technical aspects.

3.4.2 SDM
The decision making process will take place at a cluster/business area level. SDMs, with the ultimate support of their HOD, will manage operational implications and will determine timescales for introduction of any changes, in consultation with the FBO and FVC / FVL. Human resources colleagues will provide support on staffing issues.

3.4.3 FVC
FVCs will be required to carry out necessary technical assessments in their clusters, on behalf of the HOD.

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

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

The FVL may also carry out the establishment assessments or provide advice to the SDM / FVC / HOD on the best course of action if technical issues arise.

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

3.4.6 Business support team (BST)

BST will be responsible for keeping records of the establishment monitoring assessment visits and linking these to the audit frequency.

In addition, BST will be responsible for the administration of the PIA authorisation and withdrawal processes.

3.4.7 OV

The Official Veterinarian (OV) is responsible for PIA assessments and constant monitoring of their performance.

3.5 Establishment permit assessment

3.5.1 Notify SDM

An FBO should make a request to transfer to a PIA system to the SDM, who should inform the FVC / FVL at the earliest opportunity. The SDM will need to consider staffing implications and impact on existing FSA staffing at the premises.

3.5.2 FVC / FVL action

The FVC must visit the establishment and complete relevant parts of the ‘Assessment of PIA systems in poultry slaughterhouses’ PIA 4 form (Annex 10). A technical decision is required on whether the necessary systems are in place. This assessment should be completed in accordance with deadlines established by the FVC (FVL) and SDM (in consultation with the FBO).

3.5.3 Suitable outcome

In this instance the SDM and FVC / FVL will discuss time-scales and operational management of the process with the FBO.

The FVC / FVL should email a copy of the completed PIA 4 form to the Approvals and Registrations Team. The team should update the central record of assessed
establishments, send an authorisation letter to the FBO and notify Business Support Team of the outcome.

3.5.4 Unsuitable outcome

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

After the further assessment has been completed, the FVC / FVL should notify the FBO and SDM of the outcome and email a copy of the completed PIA 4 form to the Approvals and Registrations Team for information and filing. The Approvals and Registrations Team should update the central record of assessed establishments and send a copy of the report to the FBO.

3.5.5 Appealing the outcome of a refused establishment permit assessment

Where the FBO does not agree with the FVC / FVL decision, they may appeal to the Operations Head Veterinarian. The Operations Head Veterinarian is responsible for appointing an FVL / FVC from a different area as an Investigating Officer.

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

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

Upon completion of the investigation the Operations Head Veterinarian will advise the FBO of the outcome of the appeal in writing.
3.6 Establishment monitoring assessment

3.6.1 Monitoring

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

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

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

<table>
<thead>
<tr>
<th>Audit outcome</th>
<th>Full audit frequency</th>
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<tr>
<td>Good</td>
<td>18 months</td>
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<tr>
<td>Generally satisfactory</td>
<td>12 months</td>
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<tr>
<td>Improvement necessary</td>
<td>3 months</td>
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<tr>
<td>Urgent Improvement necessary</td>
<td>2 months</td>
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An additional establishment monitoring assessment can be triggered, regardless of the audit frequency, if serious concerns are raised by FSA field team regarding poor level of compliance (e.g. sudden decline in hygiene standards, insufficient staffing levels, serious HACCP failures etc.).

For establishments awarded poor audit scores (‘Improvement Necessary’ or ‘Urgent Improvement Necessary’) an assessment should be carried out as soon as possible from the date of the audit report being sent to FBO.

During the assessment the FVC / FVL should complete relevant parts of the establishment assessment PIA 4 form.

Where the FVC / FVL already has a good knowledge of the establishment, it may be possible to complete the monitoring assessment as a desk-based exercise, in consultation with the establishment OV. Establishments falling within the Improvement Necessary / Urgent Improvement Necessary categories should be visited.
3.6.2 Suitable outcome
The establishment is considered suitable to continue with its PIA system. In this instance, the FVC / FVL will complete the establishment assessment PIA 4 form and discuss their findings and decision with the FBO, also informing the SDM of the outcome. A copy of the PIA 4 form should be sent to the Business Support Team.

3.6.3 Minor deficiencies outcome
The establishment has minor deficiencies that must be addressed to allow the FBO to continue using PIA systems. The FVC / FVL should advise the FBO in writing on corrective actions that are considered necessary to ensure that the PIA inspection system can continue. The FVC / FVL should also provide a reasonable time-scale for the completion of such actions.

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

3.6.4 Major deficiencies outcome
The establishment has major deficiencies that must be corrected to allow the FBO to continue using PIA systems. Where there are major deficiencies – such as serious or multiple hygiene breaches, poorly implemented / maintained food safety management system, PIAs failing to perform their duties to the required standard and / or allowing unhygienic / unfit product to enter into the food chain - the FVC / FVL should discuss findings with the FBO and SDM.

A support MHI may be introduced onsite as an interim measure until the necessary deficiencies are addressed. This will need to be within a short timescale, depending on the nature of the risks.

The FVC / FVL should be provided the FBO with a written summary of identified deficiencies and a clear timeframe to rectify them.

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

The FVC / FVL should carry out an additional monitoring assessment within an agreed timeframe. In this assessment, the FVC / FVL must consider whether:
the FBO has remedied the deficiencies;
• an extension to the MHI support role is needed; or
• a full reversion to an MHI system is necessary.

The SDM will need to consider operational implications, and should liaise with their HOD and FVC / FVL as appropriate. A copy of the PIA 4 form should be emailed to the Business Support Team.

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

### 3.7 Withdrawal of establishment PIA permit

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

1. FVC / FVL communicates to the FBO the deficiencies identified during the monitoring assessment and provides a timeframe for rectification. All identified issues and non-compliances have to be communicated to the local FSA management (SDM, HOD) at the same time.
2. FVC / FVL is required to reassess the establishment within the agreed timeframe to evaluate improvement.
3. FVC / FVL must communicate the outcome of the second assessment to the FBO and confirm the suitability of the PIA system or recommend to the Operations Head Veterinarian a withdrawal of establishment PIA authorisation if the observed improvement was not satisfactory.
4. Findings of the FVC / FVL reassessment and recommendation made by FVC / FVL must be discussed within the local FSA team. Sufficient evidence supporting the recommendation should be presented to the Operations Head Veterinarian.
5. Operations Head Veterinarian assesses the presented evidence and advises the FBO and the local FSA team in writing of his decision.
3.8 Hybrid PIA / FSA systems
Hybrid PIA / FSA systems may be acceptable under exceptional circumstances, e.g. in larger industrial slaughterhouses where MHIs carry out online inspection duties at certain inspection points, and others are manned by PIAs. Typically though, an FBO would be expected to have an OV only; an OV plus MHI team or OV plus PIA(s) model in place.

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

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

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

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

1. FBO makes a request to SDM to transfer to PIA System.

2. SDM considers staffing implications and informs FVC.

3. FVC carries out assessment, completes PIA form.

4. FVL provides guidance and advice, as required.

5. FVC informs FBO (and SDM) of the outcome.

6.1 Premises not suitable to have PIA System. Action Plan and timescales agreed with FBO to improve.

6.2 Premises suitable to have PIA System. Agree timescales and management of process with FBO/SDM.

7. FBO appeals decision.

8. Operations Head Veterinarian nominates FVL (different area) as IO and notifies FBO of outcome of appeal.

9. FVL conducts investigation and reports findings to Operations Head Veterinarian.

10. FVC Amends PIA form as necessary, depending on outcome.

Back to 3
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FBO
FVC
SDM
FVL
Operations Head Veterinarian
Approvals and Registrations Team

Chapter 2.10 Inspection attendance
Food Standards Agency
# 3.11 Assessment process for poultry establishments wishing to move to PIA system

<table>
<thead>
<tr>
<th>SDM</th>
<th>FVC</th>
<th>Operations Head Veterinarian</th>
<th>Approvals and Registration Team</th>
<th>Business Support Team</th>
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<td></td>
<td>2. FVC carries out the assessment according to schedule (or reassesses if deficiencies were found during scheduled assessment).</td>
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<td>1. Business Support keeps record of plants requiring assessment, passes the list/schedule to FVC.</td>
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<td>3. FVC informs FBO (and (SDM) of the outcome of assessment.</td>
<td>4.1 Premises has major deficiencies to address.</td>
<td>3.1 Business Support keeps centrally record/copy of assessment (PIA form) and updates the schedule.</td>
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<td>4.2 Premises has minor deficiencies to address.</td>
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<td>4.3. Premises suitable to have PIA System</td>
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<td>5.2 SDM considers introduction of supporting MHIs based on FVC’s advice.</td>
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<td>5.1 FVC agrees action plan and timescale with FBO/SDM to rectify deficiencies. Back to 2</td>
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<td>5.3 FVC agrees action plan and timescale with the FBO to rectify deficiencies and reassesses (if necessary revisits). Back to 2</td>
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<td>6. FVC recommends withdrawal of authorisation if no improvement is observed during reassessment.</td>
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<td>7. Operations Head Veterinarian considers the recommendation and communicates the decision to FBO, FSA team and Approvals.</td>
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<td>8. Approvals team notifies the FBO about the withdrawal of the establishment’s PIA permit in writing and updates the record of establishments with implemented PIA system. Notifies Business Support Team</td>
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4. Annexes

Annex 1  OV Flexible Attendance - Assessment
Annex 2  OV Flexible Attendance - Post implementation assessment
Annex 3  Intervention Protocol - FVL Review of Approval Report
Annex 4  Intervention Protocol - Process flowcharts
Annex 5  Intervention Protocol - FBO audit outcome letters note
Annex 6  Intervention Protocol - Meeting templates
Annex 7  Intervention Protocol - HOD FVL Meeting Template
Annex 8  Intervention Protocol - Example intervention log
Annex 9  Intervention Protocol - FSA intervention record
Annex 10  PIA - Assessment of PIA systems in poultry slaughterhouses (PIA 4)
Annex 11  Cold Inspection guidance