

Field Audit of Official Veterinarians Categories of Non-Compliance with Procedures

PART 1

Nature of non-compliance (more than one may apply)	Corrective Action	Examples
Minor	<ul style="list-style-type: none"> • Advice or coaching on the spot. • Followed up by letter which is kept on file for future reference. • Consider at increased risk for further checks. • APHA will consider and document if there are any 'exceptional circumstances' which may affect corrective action (including whether there has been discussion with APHA). 	<ul style="list-style-type: none"> • Failure to have a thermometer and stethoscope for clinical examination (Not Lay Testers who should refer any suspect case for a veterinary opinion). • Failure to have surgical spirit and cotton wool. • Arrival on the holding with unhygienic protective clothing. • Use of unhygienic equipment. • Failure to use TB-approved disinfectant. • Failure to have a spare parts for syringes, needles, needle adaptors etc. • Conducting testing not in compliance with permitted interpretation level. • Failure to record tuberculin batch numbers in accordance with the OV TB Auditing Standard Operating Procedure (SOP) (TR315). • Failure to enter the correct date of test, CPH, location, signature on manual test report. • Poor stock control or high wastage of tuberculin.
Intermediate	<ul style="list-style-type: none"> • Depending on number and extent of non-compliances, may be regarded as minor or critical and action taken accordingly. Take into account any history of non-compliance within the previous two years. • Repeated minor issues may be considered an intermediate issue if their additive effect may lead to a compromise of the test result or an undermining of best practice. • APHA will consider and document if there are any 'exceptional circumstances' which may affect corrective action (including whether there has been discussion with APHA). 	<ul style="list-style-type: none"> • TB test not completed within 72 hours (+/- 4 hours) of commencement. • Conducting testing not in compliance with permitted date range for the requested test e.g. testing of animals not required by the test, or omitting animals clearly within the scope of the test requested. • Testing animals not identified as required by legislation. • Evidence of unsafe animal handling practice. • Failure to record any lumps/skin TB/relevant clinical remarks. • Unsatisfactory location of injection sites. • Injection sites not marked using a method appropriate to the type of animal. • Failure to use two hands when using callipers to make

		<p>measurements in one animal.</p> <ul style="list-style-type: none"> • Failure to carry equipment for temporary identification and/or application of DNA tags to eligible reactor animals in England and Wales. • Failure to advise keeper as to precautions/isolation requirements in relation to reactors/IRs. • Repeated failure to submit accurate or timely test reports via Sam or manual TB52/52a or to submit copies of notices e.g. TB02. • Improper storage of tuberculin including storage temperatures, stock rotation, handling. • Failure to record reasons for discrepancies between Cattle Tracing System (CTS) printouts of eligible animals and those presented for testing.
Critical	<ul style="list-style-type: none"> • Immediate suspension from Panel OCQ(V)-TT. May be reinstated following satisfactory retraining. In the case of repeated, multiple or serious non-compliance consider termination of appointment. • APHA will consider and document if there are any 'exceptional circumstances' which may affect corrective action (including whether there has been discussion with APHA) - particularly around human and animal safety. However an OV failing to undertake a TB test adequately due to inadequate facilities/Health and Safety risks is not excusable, the OV would be expected to take firm action in these cases. 	<ul style="list-style-type: none"> • Testing or certification of test report by unauthorised person or persons other than the testing OV including misuse of password. • Failure to reconcile animals presented at commencement and completion of test. • Failure to read and record all ear tag numbers at commencement and completion of test. • Failure to carry and or apply callipers correctly to measure avian and or bovine skin thickness. • Consistent failure to use two hands when using callipers to make measurements. • Failure to palpate, measure and record the skin thickness at all avian and bovine sites at commencement of test. • Failure to palpate, measure, record and report the skin thickness (including the nature of the reaction) of all avian and bovine skin reactions at completion of test. • Failure to palpate the injection sites of all animals at the completion of test for a reaction. • Failure to carry and use properly identified and functioning syringe(s). • Failure to consistently achieve and check intradermal injection (including pea-like nodule) - professional judgement should be used to determine if a successful intradermal injection has been achieved.
Serious professional misconduct	<ul style="list-style-type: none"> • APHA will refer to the Royal College of Veterinary Surgeons (RCVS). • APHA will take note of the following from the RCVS in relation to Serious Professional Misconduct when considering corrective action: <p>1. In general terms unethical or unprofessional behaviour is behaviour that</p>	<ul style="list-style-type: none"> • Deliberate falsification or reckless completion of records. • Deliberate or reckless misreading or misreporting of the test result of an animal. • Inhumane treatment of animals, abusive or threatening

	<p>falls short of the ethical or professional standards, guides or codes of conduct, accepted by a particular profession.</p> <p>Unethical or unprofessional behaviour is essentially a departure from the standard of behaviour expected as the normal among members of the profession.</p> <p>2. For a veterinary surgeon, unethical or unprofessional behaviour might mean a failure to follow the guidance or advice within the RCVS Code of Professional Conduct.</p> <p>3. Such a failure will not amount to serious professional misconduct, unless it is serious enough to question whether the veterinary surgeon should remain registered with the RCVS i.e. question whether he or she is fit to practise or work as a veterinary surgeon. Examples of serious professional misconduct include false certification, dishonesty and fraud.</p>	<p>behaviour.</p> <ul style="list-style-type: none"> • Deliberate and systematic disregard of the tuberculin testing protocol. • Accepting any bribe or financially motivated inducement (such as the threat of loss of future business) to influence the results of current or future tests. • Seeking to attract or retain clients on the understanding that testing will be carried out below standard, at excessively high speed or that results may not be reported accurately. • Coercion of a colleague or employee to commit any of the above offences.
Test result invalid	<ul style="list-style-type: none"> • In such cases, no payment will be made for the test and all or part of the herd may be restricted pending retest after 60 days. Reasonable efforts will be made to salvage the test by, for example, calling on a competent person to remeasure the cattle. • APHA will not normally apply such measures on a precautionary basis to herds previously tested but may do in the event of clear evidence that a test was carried out with reckless disregard to the protocol. • APHA will consider and document if there are any 'exceptional circumstances' which may affect corrective action (including whether there has been discussion with APHA) - fully document where appropriate. • APHA will clearly establish whether the validity of the test relates to actions of the OV on the day, or from matters outside the OV control when making the assessment of performance. 	<ul style="list-style-type: none"> • This would be the case if they had not been injected with tuberculin in good condition, if injection sites cannot be identified, if official identities had not been recorded, if skin measurements are grossly inaccurate or inconsistent or not made at all. • It should be noted that the liability for OV negligence falls with the OV and not APHA.

PART 2

Types of Sanction:

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| <ul style="list-style-type: none"> • Advice (verbal) • Correction at the time • Putting animals back through the crush • Advice (written) • Re-training • Non-payment for test | <ul style="list-style-type: none"> • Suspension from panel • Request improvement plan • Interview with practice principal • Refer for investigation • Refer to RCVS. |
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APHA is an Executive Agency of the Department for Environment, Food and Rural Affairs and also works on behalf of the Scottish Government, Welsh Government and Food Standards Agency to safeguard animal and plant health for the benefit of people, the environment and the economy.