



Findings from the

# SLAUGHTERHOUSE SOCIAL SCIENCE RESEARCH PROJECT

Ipsos MORI report for the Food Standards Agency

# Contents

<b>Executive summary .....</b>	<b>2</b>
<b>Acknowledgements .....</b>	<b>10</b>
<b>Copyright statement .....</b>	<b>11</b>
<b>The authors .....</b>	<b>12</b>
<b>Abbreviations .....</b>	<b>13</b>
<b>Chapter 1: Background and methodology .....</b>	<b>15</b>
1.1 Background .....	15
1.2 This research .....	19
1.3 Methodology .....	20
1.4 Report outline .....	27
<b>Chapter 2: Key respondent profiles and roles .....</b>	<b>28</b>
2.1 Official Veterinarian .....	28
2.2 Meat Hygiene Inspector .....	31
2.3 Food Business Operator .....	33
2.4 Slaughterhouse staff .....	34
2.5 Plant Inspection Assistants (PIAs) .....	36
<b>Chapter 3: The drivers of and barriers to taking ownership of food safety .....</b>	<b>39</b>
<b>Chapter 4: Key respondent types views on food safety .....</b>	<b>43</b>
4.1 Descriptions of food safety .....	43
4.2 OV's' description of food safety .....	46
4.3 MHIs' description of food safety .....	48
4.4 FBOs' description of food safety .....	49
4.5 Staff description of food safety .....	52
<b>Chapter 5: FBO mindsets and their effect on staff .....</b>	<b>56</b>
5.1 Resistant .....	57
5.2 Reactive .....	61

5.3 Proactive .....	63
<b>Chapter 6: Officials' approaches .....</b>	<b>66</b>
6.1 Facilitator.....	67
6.2 Educator/Consultant.....	70
6.3 Enforcer.....	73
6.4 Whole-plant vs. Inspection-based approach .....	76
6.5 Relationships between officials .....	77
<b>Chapter 7: Relationships between officials, FBOs and staff ....</b>	<b>80</b>
7.1 Other factors that influence relationships .....	80
7.2 How mindsets and approaches interact .....	82
<b>Chapter 8: Views on the current regulatory regime.....</b>	<b>87</b>
8.1 Concerns about the current regime .....	88
8.2 Views of official controls in slaughterhouses .....	93
8.3 Impact of the current regime .....	96
<b>Chapter 9: Respondents' suggested improvements to the regulation of slaughterhouses .....</b>	<b>101</b>
9.1 Industry taking responsibility for some official tasks .....	102
9.2 Earned recognition .....	103
9.3 Suggested regulatory change along the farm to fork path.....	104
<b>Chapter 10: Conclusion and recommendations .....</b>	<b>107</b>
<b>Appendix 1: Discussion of research design and methodological challenges encountered during this study .....</b>	<b>114</b>
<b>Appendix 2: Research materials .....</b>	<b>135</b>
Discussion guides .....	135
Case study visit stimulus .....	188
Observation guide .....	191
 <i>Figure 1: Methodology .....</i>	 <i>20</i>
<i>Figure 2: How food safety is understood by participants.....</i>	<i>44</i>
<i>Figure 3: Methodology .....</i>	<i>116</i>



Slaughterhouse social science research project

# EXECUTIVE SUMMARY

# Executive summary

In 2011, the Food Standards Agency (FSA) commissioned Ipsos MORI to explore how the regulation of slaughterhouses works in practice: how official controls are delivered and the environment in which this happens. This report presents the findings and conclusions from 24 case study visits to slaughterhouses across the UK.

Unlike in other food establishments, the delivery of official controls in slaughterhouses requires a permanent presence of official veterinarians (OVs) and meat hygiene inspectors (MHIs) in the majority of premises that slaughter. The interface and interaction between these officials (OVs and MHIs) and Food Business Operators (FBOs) and their staff sets the regulation of the meat industry apart from other industries. The nature of this relationship is one of the key areas of investigation of this study.

The main research objectives were to:

- Develop an understanding of **current behavioural and social influences in slaughterhouses and their impact on processes and structures** (and vice versa) and **consequently the implications for how official controls are delivered**.
- Explore in detail **what encourages or discourages duty holders and employees to take ownership of** food safety, in the context of the wider influences which exist in the workplace environment.<sup>1</sup>
- Understand **how official veterinarians (OVs) and meat hygiene inspectors (MHIs) approach enforcement** and how they decide what approaches to adopt.

After a scoping stage which involved a review of the key literature and telephone interviews with key informants, 24 slaughterhouses were recruited for case study visits. In order to include the range of different types of plant in the UK within the research, quotas were set on nation, region, size of slaughterhouse, average HACCP<sup>2</sup> score for the past three audits and type of meat (red or white).

Paired researchers typically spent two days in each slaughterhouse, interviewing the FBO, OV, MHI(s) and members of staff and conducting observations of regulatory practice. The immersive approach allowed for follow up interviews with key respondents after the observations and informal conversations throughout the

---

<sup>1</sup> In order to avoid ambiguity and confusion the initial objective wording was in conjunction with FSA revised from "to take responsibility for" to "take ownership of". As a result, subsequent fieldwork and analysis examined what factors can encourage/discourage ownership of food safety.

<sup>2</sup> Hazard Analysis and Critical Control Point (HACCP) is an internationally recognised way of managing food safety and protecting consumers. It is a requirement of EU food hygiene legislation that applies to all food business operators except farmers and growers.



visit, in order to build up a detailed picture of the relationships, attitudes and behavioural and social influences within each slaughterhouse.

The key findings are as follows:

## Roles

- OV's saw their primary role as safeguarding public health and animal welfare by ensuring that the slaughterhouse complies with regulations via use of informal or formal action. MHIs saw their role primarily as ensuring that all meat that enters the food chain is fit for human consumption (FFHC) by carrying out a thorough post mortem inspection. Officials therefore see the focus of their role as protecting the end-user i.e. the consumer.
- FBOs described the most important aspect of their role as the provision of high-quality meat to customers, either directly to the consumer or to retailers. As a result, they were usually focused on quality as a means to enabling sales, and generally dependent on good customer feedback to retain custom. Food safety is usually seen as a component of quality, but not synonymous with it.
- Staff in slaughterhouses tended to see their role as "getting the job done and getting home". However, they had a wide range of expertise and training which affected their views of their roles and the tasks necessary to ensure animal welfare and food safety. Staff tended to be more highly skilled and experienced in red meat slaughterhouses, whereas in white meat plants they tended to be more task focused.

## Ownership of Food Safety

- The EU Food Hygiene Regulations<sup>3</sup> require that FBOs are responsible for the establishment and operation of food safety management procedures in slaughterhouses. The Hazard Analysis and Critical Control Point (HACCP) system provides the framework for the planning and implementing of FBO food safety obligations.
- Researchers observed different levels of 'ownership' of food safety in different slaughterhouses. Ownership of food safety is affected by a wide range of factors. It is not possible to pinpoint one key reason that explains ownership in any plant as each site has different risks, staff and FBO knowledge, understanding, attitudes and mindsets, resources, suppliers, customers and officials' approaches.
- Perceptions of roles also had an impact on ownership of food safety. Sometimes the permanent presence of the official seemed to undermine legislative intent, as it signified to a small number of FBOs that primary responsibility for food safety was not theirs, and that "someone else will do

---

<sup>3</sup>Regulation (EC) Nos. 852/2004, 853/2004 and 854/2004.

it". The extent to which this was the case often depended on the approach of the officials in the plant, especially the OV.

- In almost all plants where the FBO could be described as taking full ownership of food safety, their relationship with customers was described as their main motivation in business. Robust food safety processes were therefore put in place in order to satisfy them, particularly where customers are either:
  - a) Large supermarkets, who demand external and last-minute audits and can remove business suddenly, or
  - b) Local customers upon whose ongoing satisfaction the reputation of the slaughterhouse depends.

Where the customer base is less stable, FBOs' focus can be price over quality and they may question the value of doing more than is necessary to ensure that the meat achieves the health mark.<sup>4</sup>

- Resource (or lack of) is important in determining how much ownership of food safety an FBO takes. Where a slaughterhouse is struggling financially the FBO in that plant is often resistant to improving standards.
- Supervision of staff can also drive ownership. Where there are the resources available to hire quality assurance staff, technical teams or full-time supervisors, or the slaughterhouse is small enough that the FBO can supervise personally, staff adherence to food safety procedures can be monitored and assured. In many plants, staff lack this level of supervision,
- The evidence suggests that ensuring that every FBO takes full ownership in each slaughterhouse may require a range of tailored approaches, based on an individual appraisal of all these factors. One key criticism of the current regulatory regime was that it is "one-size fits-all" and fails to recognise the differences between slaughterhouses.

The other key drivers of ownership of food safety are outlined in the next two sections of the summary:

## Understanding of Food Safety

- Views of food safety risks of the FBO and staff were found to be one of the most important drivers of taking ownership of food safety. FBOs had different understanding and interpretations of their food safety obligations as each other; and in many cases their understanding differed from that of the FSA.

---

<sup>4</sup> Once a carcass has been inspected by an MHI/OV and passed as fit for human consumption the official then applies the health mark. This is a stamp that is applied to carcasses produced in approved fresh meat premises in accordance with the regulations, under veterinary supervision.

- Many FBOs took what they described as a “commonsense” view of food safety, whereby their responsibility is to produce “quality” meat. By quality meat they meant meat that looks good for the consumer, has been properly eviscerated and that has minimal visual contamination and therefore can be passed by MHIs as fit for human consumption (FFHC). For these FBOs, FFHC is seen as safe enough, and as a result thought that food safety management throughout the plant was less important than ensuring that carcasses pass post mortem inspection.
- Views of risks to meat outside the slaughterhouse sometimes affected views on how to control risk within it. For some, the slaughterhouse was seen as a low risk part of the food chain, and they argued that if consumers cooked their meat properly it would eliminate risks altogether.
- This view of food safety can be a barrier to FBOs taking full ownership of food safety (as required under EU regulation) and ensuring that they and their staff have a good understanding of the critical control points throughout the slaughtering process and how to control risks.
- Better understanding of food safety risks by FBOs - such as risk of contamination caused by the spread of microbiological pathogens - can help to drive more ownership of food safety. Good knowledge of food safety risks can help FBOs to understand the reasoning behind regulations and officials’ requests, which in turn means they can communicate food safety messages better to their staff. Officials can be integral to ensuring this better understanding, particularly in small and medium-sized slaughterhouses.

## Mindsets, Approaches and Relationships

- Given few FBOs take a holistic view of food safety, and given that officials are permanently present in all plants, in many slaughterhouses, food safety outcomes can often be highly dependent on the relationships between the officials and FBOs and staff. Whether these relationships are effective or not is largely dependent on both the approach taken by the official and the mindset of the FBO.
- The relationships between officials and FBOs and slaughterhouse staff could be one of several drivers of, or barriers to, FBOs taking ownership of food safety. How FBO mindsets and official approaches interacted affected the relationships between FBOs, staff and officials, along with other factors including bad relationships with previous officials, longevity of officials and cultural and language issues.
- Some FBOs complained of communication difficulties with their officials, many of whom were not English first-language speakers. In many cases this seemed to be driven by their reaction to the officials’ approach, rather than xenophobia. By contrast, where the official was viewed as



experienced and knowledgeable, relationships tended to be better (whether the official in question was British or otherwise).

- During analysis, researchers grouped FBOs into three main types of mindset, with regard to their attitudes towards compliance with regulations. These are:<sup>5</sup>
  - **Resistant:** FBOs who lack the resources, knowledge and, most importantly, the will to comply with all regulations. These FBOs usually had decades of experience and believed that they have always ensured that their meat is high-quality and FFHC. They tended to resent the presence of the OV, either because they thought that OVs have insufficient expertise (e.g. because the OV is new to the slaughterhouse environment), or because they saw OVs as replicating work that they already carry out. On the other hand, resistant FBOs valued the post mortem inspection carried out by the MHI as it adds an independent rubber stamp to reassure customers.
  - **Reactive:** These FBOs were willing to comply with regulations as far as is necessary to stay in business and not incur any reputational damage. However, they often lacked the knowledge or resources to do so. They usually tried to build up good relationships with officials and valued their advice and guidance as it helped them keep up to date with regulations. However, they can have bad relationships with officials they perceive to be disproportionate or lacking sufficient expertise for their role.
  - **Proactive:** These FBOs were willing to comply with regulations irrespective of the presence of officials and have the knowledge and usually the resources to do so. This mindset tended to be seen in (but was not limited to) larger slaughterhouses where strong external pressure from customers forces FBOs to run audit- and process-driven plants where FSA regulations are one of a number of standards that need to be complied with in order to retain business.
- During analysis, it was also possible to group officials' approaches to their roles into three main categories:
  - **Facilitator:** This approach involves working directly with the FBO and staff to improve compliance, often to the point of taking responsibility for food safety and animal welfare outcomes in the plant (either by choice or out of perceived necessity).

---

<sup>5</sup> These categories are porous, and FBOs may sit between two at all times, or move from one to another depending on the approach of the OV, the particular regulations in question or other factors including business performance. The mindset of the FBO tended to be replicated in the staff. Therefore, for the most part, it can be assumed that the staff of a resistant FBO, for example, will also have a resistant mindset.

- Example of facilitator behaviour: The FSA operates a no knife policy which means that MHIs should not be involved in trimming. However, some MHIs felt that trimming small amounts of contamination from the carcass before applying the health mark was part of their role, others ascribed their behaviour to lack of clarity around the 'no knife' policy that is currently in place, while some reported feeling pressured to undertake trimming although they did not view it as their role.
- **Educator/consultant:** This approach involves advising the business in order to improve compliance, and attempts to build capacity within the business to take ownership of food safety and animal welfare.
- **Enforcer:** This approach involves using the regulations themselves to try to improve compliance. Officials who take this approach tend to stick rigidly to their job description and use official language when describing their role.
- The facilitator and educator approaches can only be taken where FBOs and staff are willing to accept help and learn from officials and, as such, can usually only be effective where the official in question is perceived as having sufficient slaughterhouse experience to be able to advise, and is perceived to understand the business objectives of the slaughterhouse. Often FBOs perceived officials, and in particular OV's and recently qualified MHIs, as having insufficient experience and lacking understanding both of inspection and of the meat trade.
- While many FBOs describe ensuring food safety as their responsibility, their actions can contradict this. In some cases, this is simply because they know that the officials will do it for them as they are taking a facilitator approach. Some FBOs, particularly those who are resistant, think that the officials *should* be taking ownership for ensuring food safety, given that they must be present at all times and the FBO is required to pay for at least part of the cost of their presence.
- On the other hand, when OV's take an educator approach, clear communication by respected officials over the responsibilities of the FBO, and the reasoning behind those responsibilities, can drive more positive attitudes towards compliance and spur FBOs to take ownership of food safety.
- Perception of officials as consistent and proportionate in their interpretations of regulations and enforcement approach can also drive more positive attitudes towards compliance and increased ownership of food safety. By contrast officials who are seen as "hardline" or "nitpicking" enforcers can act as a barrier as their approach is seen as disproportionate by FBOs, particularly those FBOs who lack understanding of how some regulations relate to food safety.

- Relationships between officials (OVs and MHIs) differed across slaughterhouses in the study, ranging from excellent working relationships to minimal contact or even tension. However, effective relationships between officials are important for encouraging good food safety outcomes. When officials (OVs and MHIs) are perceived by FBO and slaughterhouse staff as a single regulatory unit with a single regulatory message it can offer the consistency necessary to drive some FBOs and slaughterhouse staff to improve standards.

## Regulation

- Research participants generally thought that the current regulatory regime is effective in ensuring that meat is fit for human consumption (FFHC) (although some caveat that this is only true insofar as this can be determined through sensorial inspection), and that animals are treated humanely.
- Most officials were aware of the significance of microbiological risks (e.g. E-coli, salmonella), and OVs spontaneously reported the limitations of post mortem inspection.
- However, many FBOs and a few officials put forward criticisms of the current regime, including:
  - It is expensive to deliver
  - The 'one-size fits' all regulatory model is potentially unfair and disproportionate
  - Some official controls are not seen to be risk-based, which leads some to think that these controls are misdirected
  - There is a lack of consistency among official approaches and interpretations of regulations which leads some FBOs to be uncertain about what improvements are needed
- Ante mortem inspection is viewed by many FBOs and staff as replication of tasks already carried out by slaughterhouse staff, and most FBOs advocated its abolition or transfer to their own staff.
- Research respondents appeared firmly to believe that sensorial inspection (i.e. visual, palpation and incision) is the only workable way of checking that meat is FFHC, and usually supported the retention of independent post mortem inspectors, although a few FBOs in red meat plants were of the opinion that their staff could perform this task.
- In general, participants felt that the purpose of HACCP to ensure food safety management is sound. However, officials felt sometimes these documented procedures were not reflected in the food safety behaviours of slaughterhouse staff. As a result, a few OVs felt too much emphasis is

given to audited HACCP plans for making decisions about the frequency of regulatory interventions.

- FBOs also criticised the current audit system based on one of three assertions: perception of auditor not being qualified to make a judgment; view of audit focus lacking a link to the main risks perceived; and view of audit findings and their reliability.

## **Respondents' suggestions for improvements to regulation**

- The main suggestion for improvement to the current system of audits was that they be carried out by independent inspectors in order to enhance their credibility with FBOs and officials, though a small number of respondents thought that there were risks involved as independent auditors would lack sufficient knowledge of food safety behaviours in the plant.
- Industry taking responsibility for some official tasks in the future was advocated by some but officials thought this would lead to unsafe meat entering the food chain, and even some FBOs rejected this idea due to concern about the reputational damage that it could have on the industry as a whole.
- Earned recognition was favoured by both FBOs and some officials. They felt that some businesses could be rewarded by a reduced regulatory oversight, which they believed might enable an increased focus on non-compliant plants. It was thought that verification could then be provided by third party external audits or unannounced inspection conducted by an independent official.
- Many FBOs argued for an increased focus along other parts of the food chain. They thought that farmers should have more responsibility for the cleanliness of supplied livestock and retailers, and consumers should be better educated about the storage and handling of meat once it has moved along the food chain.

# Acknowledgements

This project was commissioned by the Food Standards Agency (FSA). The authors would like to thank Javier Dominguez, Carles Orri, Ouafa Doxon, Guy Hannan, Joanna Disson, Robyn Polisano and their colleagues for their support and advice in delivering this research. We would also like to thank Dr Ron Iphofen (the Agency's appointed ethics advisor) for their input during the scoping stage.

Sincere thanks are due to all the stakeholders, officials and slaughterhouse staff who agreed to accommodate our researchers and were willing to discuss their views about regulatory practice.

The authors would also like to thank the Ipsos MORI project team for their help with fieldwork and analysis.



# Copyright statement

© Crown Copyright 2012

This report has been produced by Ipsos MORI under a contract placed by the Food Standards Agency (the Agency). The views expressed herein are not necessarily those of the Agency. Ipsos MORI warrants that all reasonable skill and care has been used in preparing this report. Notwithstanding this warranty, Ipsos MORI shall not be under any liability for loss of profit, business, revenues or any special indirect or consequential damage of any nature whatsoever or loss of anticipated saving or for any increased costs sustained by the client or his or her servants or agents arising in any way whether directly or indirectly as a result of reliance on this report or of any error or defect in this report.

## The authors

**Sarah Pope** is a Research Executive in the Social Research Institute at Ipsos MORI.

**Graham Bukowski** is a Research Manager in the Social Research Institute at Ipsos MORI. Graham specialises in qualitative research.

**Anna Beckett** is a Research Director and Head of Ipsos MORI's Central Government team.

## Abbreviations

AH	Animal health
AM	Ante mortem
AW	Animal welfare
DARD	Department of Agriculture and Rural Development (Northern Ireland)
EU	European Union
FBO	Food business operator
FFHC	Fit for human consumption
FSA	Food Standards Agency
HACCP	Hazard analysis and critical control point
MHI	Meat Hygiene Inspector (UK term for OA)
OA	Official Auxiliaries (EU term)
OV	Official Veterinarian
PIA	Plant Inspection Assistant
PM	Post mortem
SMI	Senior Meat Inspector



Slaughterhouse social science research project: Section A

# INTRODUCTION

# Chapter 1: Background and methodology

In 2011, the Food Standards Agency (FSA) commissioned Ipsos MORI to explore how the regulation of slaughterhouses works in practice: how official controls (control performed for the verification of compliance with food law) are delivered and the environment in which this happens. This report presents the findings and conclusions from 24 case study visits to slaughterhouses across the UK.

## 1.1 Background

This initial section is intended as background to the study. Some readers may already be knowledgeable of the current legislation and the FSA's review of meat controls and could begin their reading at section 1.2 "this research".

EU legislation<sup>6</sup> requires meat official controls to be delivered in all meat plants. Their aim is to protect public health, animal health and animal welfare. The FSA is the central competent authority in the UK in relation to meat hygiene. In England, Scotland and Wales the official controls are delivered directly by the FSA. In Northern Ireland the controls are delivered by the Department of Agriculture and Rural Development through a Service Level Agreement with the FSA in Northern Ireland.

Official controls are not unique to the meat industry. For example the FSA is also directly responsible for certain official controls on all food sectors. However, official controls in the meat industry have a number of unique attributes and these are discussed below.

### Permanent presence of officials

Unlike in other food establishments, delivery of official controls in slaughterhouses requires a permanent presence of veterinarians and meat hygiene inspectors in the majority of premises that slaughter. The interface and interaction between officials and Food Business Operator (FBO) sets the regulation of the meat industry apart from other industries – the nature of this relationship is one of the key areas of investigation for this study.

### Key respondent types

There are a number of key respondent types with different roles who operate in slaughterhouses. For the purpose of the study they are defined as follows:

---

<sup>6</sup> From 1 January 2006, the following basic EU food hygiene regulations have applied throughout the UK:

Regulation (EC) 852/2004 on the hygiene of food stuffs

Regulation (EC) 853/2004 laying down specific hygiene rules for food of animal origin

Regulation (EC) 854/2004 laying down specific rules for the organisation of the official controls on products of animal origin intended for human consumption



- The **Food Business Operator** (FBO) is the natural or legal persons responsible for ensuring that the requirements of food law are met within the food business under their control.<sup>7</sup> Throughout this report, the FBO refers to the person who self-defined as such during the case-study visit.
- **Slaughterhouse staff** are employed by the FBO and are defined as individuals who are responsible for performing any food safety or animal health and welfare related tasks as part of their roles within the slaughterhouse.
- **Plant Inspection Assistants** (PIAs) are employed by the FBO, typically work in white meat plants, and are responsible for post mortem inspection but sometimes carry out evisceration.
- **The regulatory staff** are employed directly or indirectly by the FSA, although the cost is in part recovered from FBOs (see below for more detail), and they spend all of their time in slaughterhouses.
  - **Official Veterinarians** (OVs) perform a range of official tasks including ante mortem inspections and have responsibility for keeping a record of the findings of the inspections including, for example, details of contraventions, actions required and monitoring of these actions.
  - **Official Auxiliaries** (OAs) or **Meat Hygiene Inspectors** (MHIs) carry out a number of official tasks including post mortem inspections.<sup>8</sup>
  - **Senior Meat Hygiene Inspectors** also carry out post mortem inspections and may assist the OV in the line management of MHIs and other official controls such as audits, see below.

During 2011/12, the FSA employed, directly or through contractors, 270 veterinarians and 769 meat inspectors (Full Time Equivalents) to carry out the official controls in Great Britain. In Northern Ireland, DARD Veterinary Services employs 30 official veterinarians and 100 meat hygiene inspectors.<sup>9</sup>

## Official controls in slaughterhouses

Official controls are any form of control performed for the verification of compliance with food law. These controls require specified inspections of all

---

<sup>7</sup> Regulation (EC) 178/2002

<sup>8</sup> The OV need not be present during post mortem inspection if:

- an MHI carries out post mortem inspection and puts aside abnormal meat with uncommonly occurring conditions and all other meat from the same animal
- the MHI documents their procedures and findings in a manner that allows the OV to be satisfied that standards are being met, and
- the OV subsequently inspects all such meat.

<sup>9</sup> <http://www.food.gov.uk/multimedia/pdfs/board/fsa120904.pdf>

animals, carcasses and offal through risk-based audits to verify that approved fresh meat premises comply with EU Food Hygiene Regulations. The FSA has a statutory duty to provide these services on demand, 24 hours a day, 365 days a year, throughout England, Scotland and Wales. In Northern Ireland, the service level is provided by DARD.

The official controls in use are inspection, monitoring, sampling for analysis, surveillance and verification.<sup>10</sup>

- Audits are a systematic and independent examination to determine whether activities and related results comply with planned arrangements, and whether these arrangements are implemented effectively and are suitable to achieve objectives. Frequency of audits is determined by type of processes carried out (which vary by species type and slaughterhouse set-up), the level of throughput, the FBO's record of compliance and customer base.
- Inspections are the examination of any aspect of meat in order to verify that such aspect(s) comply with the legal requirements of food law. There are two key inspection points in any slaughterhouse:
  - **Ante mortem inspection** is carried out by the OV and must take place before an animal can be slaughtered (if an animal is slaughtered without ante mortem inspection then it must be condemned). The OVs check for any signs of disease, injury, fatigue, stress or mishandling.
  - **Post mortem inspection** is carried out by the MHI(s) although, in some small plants, OVs carry out both ante and post mortem inspection. It involves sensorial (i.e. visual, palpation and incision) inspection of the head, offal and the carcass. If the carcass is passed FFHC officials can apply the health mark. At other times, the whole animal or parts of it will be condemned.
- Monitoring is conducting a planned sequence of observations or measurements with a view to obtaining an overview of the state of compliance with food law.
- Sampling for analysis is taking food or any other substance (including from the environment) relevant to the production, processing and distribution of meat in order to verify, through analysis, compliance with food law.
- Surveillance is a careful observation of slaughterhouse staff, FBOs, or their activities.
- Verification is the checking, by examination and the consideration of objective evidence, whether specified requirements have been fulfilled.

---

<sup>10</sup> Regulation (EC) 882/2004

In addition, official controls also encompass other activities aimed at supporting FBOs and slaughterhouse staff to achieve compliance with food law. These include:

- Education, advice and coaching provided at a slaughterhouse; and
- Information and intelligence gathering, (including observations, and sampling where the analysis is not carried out by an official laboratory).

## **Enforcement**

Regulatory practice can lead to enforcement action.<sup>11</sup> When deciding the type of enforcement action to take, officials are required to adopt a risk-based and proportionate approach. In doing so, an official would take into account the nature of the breach of food law (i.e. the potential for risk to the general public), the history of FBO compliance, and the FBO's willingness and likelihood to undertake the work the official thinks is necessary to achieve compliance.

## **Cost and charging**

Under EU legislation the FSA is required to charge for the cost of delivering certain official controls in meat plants. Time-based (on the costs of OV's and MH's) charging was introduced in 2009, although a high proportion of businesses receive a discount based on the proportion of the full cost that they were charged in 2008/09 when the FSA charged either a throughput charge or a time based charge depending whichever was the lower.

The charging model is currently being reviewed, with industry input, therefore charging was considered out of the scope of this project.<sup>12</sup> However, the cost of delivery of official controls is raised spontaneously by FBOs and the level of subsidy received appears to impact on views. Therefore, where relevant to understanding the views expressed, we have included reference to costs and charging in our report.

## **FSA review of meat hygiene inspections**

As part of the EU review of the delivery of official controls<sup>13</sup>, the FSA is reviewing the current system of meat hygiene inspection in slaughterhouses. There has been a longstanding concern that the system is based on sensorial inspection (visual, palpation and incision) and, while this might have been appropriate when

---

<sup>11</sup> Enforcement includes advisory visits, assisting the FBO with compliance, approval visits and formal enforcement action. Verbal advice, written advice and written warnings all constitutes informal enforcement action. Formal enforcement action includes official detention of food, the service of formal notices, formal warnings, cautions, referrals for investigation and prosecutions.

<sup>12</sup> The most recent FSA board decision on this issue is outlined here:

<http://www.food.gov.uk/multimedia/pdfs/board/fsa120904.pdf>. It was decided that the FSA should pursue a more collaborative approach with stakeholders interested in these issues, commission an external efficiency review of the delivery of UK meat official controls and continue to negotiate with other Government departments on their appetite for taking on responsibility for allocating any ongoing subsidy.

<sup>13</sup> <http://www.efsa.europa.eu/en/topics/topic/meatinspection.htm>

introduced, it does not necessarily address the most significant current public health risks which arise in meat plants, which are microbiological. These microbiological threats – the bacteria campylobacter, salmonella and E.coli, for example – cannot be adequately tackled using traditional inspection methods. In this context, the Food Standards Agency (FSA) is reviewing the current system of meat hygiene inspection in slaughterhouses.

In September 2009, the FSA Board endorsed a programme of work that outlined the future steps that will be taken to deliver an enhanced system of official controls on meat. This forms a key part of the FSA's Strategy to 2015 and, as such, it has been funding research to gather evidence and inform the debate in relation to modernising the meat inspection regime. As well as modernising the inspection methods to ensure they protect public health and animal health and welfare, the review aims to develop a set of controls that are risk-based, proportionate, targeted and cost-effective but continue to protect public health.<sup>14</sup>

## 1.2 This research

In this context, the research is designed to provide insight into the complex interplay of different internal (e.g. workplace roles and relationship structures) and external (e.g. customer influence) dynamics, and to examine how these might impact on food safety behaviours. The research also explored both how the current regulatory approach is working and suggestions for its improvement.

Specifically the research objectives were to:

- Develop an understanding of **current behavioural and social influences in slaughterhouses and their impact on processes and structures** (and vice-versa) and **consequently the implications for how official controls are delivered**.
- Explore in detail **what encourages or discourages duty holders and employees to take ownership of** food safety, in the context of the wider influences which exist in the workplace environment.<sup>15</sup>
- Understand **how veterinarians/meat hygiene inspectors approach enforcement** and how they decide what approaches to adopt.

The findings are intended to help inform the on-going review of the delivery of official controls in slaughterhouses and thus help ensure that any possible changes to the current system are evidence-based. More broadly the research

---

<sup>14</sup> FSA research into the modernisation of meat controls can be accessed at: <http://www.food.gov.uk/enforcement/monitoring/mhservice/reviewofmeatcontrols/>

<sup>15</sup> During fieldwork, in order to avoid ambiguity the objective wording was revised from “to take responsibility for” to “take ownership of” in conjunction with FSA. As a result, subsequent fieldwork and analysis examined what factors can encourage/discourage ownership of food safety.

aims to help the FSA deliver its strategic aim that food produced or sold in the UK is safe to eat as a result of effective, risk-based, proportionate regulation.<sup>16</sup>

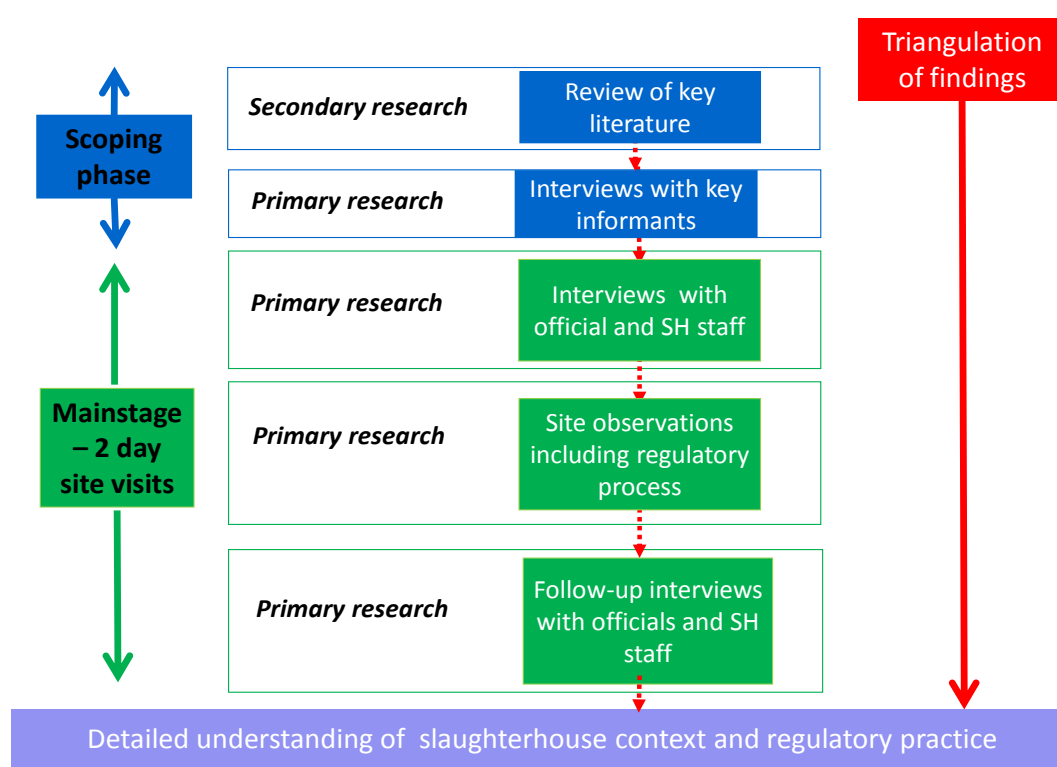
## 1.3 Methodology

### Overview of research design

The following section provides a brief account of how the study was conducted. Appendix 1 contains a detailed commentary on the research design and how methodological challenges encountered were dealt with, as well as a detailed discussion of the approach to sampling, recruitment, data collection and analysis.

In order best to meet the objectives of this study, a mixed-method approach was agreed in consultation with FSA. A staged approach to data collection was used (see Figure 1), incorporating a variety of data collection methods, and ensuring that each stage of the research built on the insights previously gleaned.

**Figure 1: Methodology**



<sup>16</sup> The six outcomes FSA aim to deliver by 2015 are: foods produced or sold in the UK are safe to eat; imported food is safe to eat; food producers and caterers give priority to consumer interests in relation to food; consumers have the information and understanding they need to make informed choices about where and what they eat; regulation is effective, risk-based and proportionate, is clear about the responsibilities of FBOs, and protects consumers and their interests from fraud and other risks; and enforcement is effective, risk-based and proportionate and is focused on improving public health.



At the outset, desk research and 16 in-depth telephone interviews with key informants (including representatives from the FSA, industry and professional organisations) were conducted. As well as providing insight into the slaughterhouse context and views of the current regulatory regime, findings from these interviews were used to inform the research approach for the remainder of the study.

Following this scoping phase a research design using a mixed-qualitative (interview and observation) approach was agreed with the FSA. This was largely because qualitative research enables in-depth exploration of participants' perceptions and the reasons for these perceptions, ideal for a study where one of the primary aims is to gain insight into the often complex factors underpinning food safety behaviours.

Our method of investigation is also focused on exploring the implications of continued presence of officials in slaughterhouses and the impact this has on the delivery of food safety controls and food safety. To do this effectively we adopted a case study approach so we could understand the wider context of each interview and could triangulate the information gathered from the different key respondents.

An added benefit of the visits was that they allowed researchers to spend extended periods of time with officials and slaughterhouse staff, helping to build rapport and trust with them. This proved to be important in helping researchers reassure all players that the research study was not an audit or a review of their performance.

The Ipsos MORI research team conducted twenty-four two-day visits in slaughterhouses across the UK. The visits offered the opportunity to juxtapose the key players' views about the factors influencing the social and regulatory context with their actions, comparing what they say with what they do. They also enabled a discussion about what impact, if any, official (i.e. the OV and MHI) approaches were likely to have on behaviours of slaughterhouse staff.

In each slaughterhouse researchers selected different staff based on a number of key variables, these were:

- Job role e.g. operative, manager
- Area of work e.g. production, technical
- Years of experience at plant

While the initial phone-call to FBOs was useful in terms of lining-up potential candidates sometimes the selection of respondents was dictated by who was available at the time of the visit. In order to ensure a good spread of candidates and limit FBOs from selecting interviewees, researchers were, insofar as possible, flexible around the shift patterns and workload of participants.

The slaughterhouses selected were chosen to reflect the full range of slaughterhouses in the UK on a number of key variables (see appendix for a detailed breakdown of sampling approach). We visited the following:

<b>Compliance band<sup>17</sup></b>	<b>Level of throughput</b>			
	Low	Medium	Large	Total
Good	4	4	2	<b>10</b>
Adequate	4	4	2	<b>10</b>
Weak	1	2	1	<b>4</b>
<b>Total</b>	<b>9</b>	<b>10</b>	<b>5</b>	<b>24</b>

### **Achieved quotas for other key variables<sup>18</sup>:**

Meat:	19 red meat
	5 white meat
Geography:	4 Northern Ireland
	3 Scotland
	3 Wales
	14 England

During each visit, paired researchers conducted between four and six in-depth interviews with officials and slaughterhouse staff and unaccompanied silent observation of the regulatory process.

The in-depth interviews with each respondent lasted between 45 and 90 minutes. Three different discussion guides were developed for interviews with officials (OV/MHI), Food Business Operator (FBO), and slaughterhouse staff. For follow-up interviews with officials and FBOs, an aide memoire was used. Given the nature of the site visits, researchers were able to have a host of informal chats with key players while on-site. These provided valuable insights which were a useful supplement to information collected during formal interviews.

<sup>17</sup> Slaughterhouses were divided into compliance bands (good, adequate and weak) based on the average of their HACCP compliance scores for the last three audits of the plant.

<sup>18</sup> It was not possible to recruit either a fully halal or fully kosher plant, partly due to the fact that these plants were not flagged on the database provided by FSA. Researchers did visit plants where halal killing was practiced, but this was not observed (or thought by respondents) to make any difference to behaviours, enforcement or compliance, hence it is not commented on in the report.

At least one extended observation of both an OV and a MHI conducting their respective regulatory duties (i.e. ante or post mortem inspection) was conducted during every site visit. Before conducting any observations, the researcher briefly explained the purpose of the research and reassured those involved that the FSA would not request Ipsos MORI to pass on identifiable data. The researcher then conducted the observation in silence and used an observation matrix to record what they saw.

After the observation, the researchers conducted follow-up interview with officials and slaughterhouse staff. These interviews were particularly useful given the focus on understanding subtleties of how individuals perceive their colleagues' roles and responsibilities and how the social structures and relationship dynamics can impact on food safety behaviours.

We aimed to review a certain number of documents on each site (e.g. the day book, enforcement log and enforcement notices). However this was not always possible as some officials said that they had not been adequately informed by their managers about the research and thus were reluctant to allow researchers access to what they considered sensitive documentation.

Where we did examine such documentation across case study sites, it gave researchers an additional understanding of animal health/welfare and food safety behaviours in slaughterhouses and an insight into how specific cases were dealt with. During interviews, the researchers drew on these cases to build a more detailed and nuanced understanding of the slaughterhouse context.

All case study visits took place between June and September 2012 and, where permission was obtained, all interviews were recorded.

### **A note on interpretation of qualitative data**

Qualitative research approaches are used to shed light on *why* people hold particular views, rather than *how many* people hold those views. The results are intended to be illustrative rather than statistically reliable and, as such, do not permit statements to be made about the extent to which something is happening. Given the qualitative nature of this study, this report aims to provide detailed and exploratory findings that give insight into the perceptions, feelings and behaviours of people rather than firm conclusions from a robust, quantifiably valid sample.

It is not always possible or useful in qualitative research to provide an indication of the prevalence of a certain view, both due to the relatively small number of participants generally involved and the way in which they are encouraged to express their views, which allows for nuance and encourages the expression of subtly different opinions, which means that any attempts at quantification may be imprecise. We therefore avoid stating the number of people who have expressed a particular thought or attitude. In general, we report on views and opinions that were noted across cases or types of slaughterhouses. However, where we have thought it important and useful to reflect views which were mentioned infrequently but which are important (e.g. because the view was held very strongly, or because there were specific reasons why a different view was expressed), we have used

phrases such as "a few" or "a limited number" to illustrate that these views were not widely held to avoid misinterpretation. However, any quantification used in our reporting (e.g. a 'handful' of participants) should always be considered indicative, rather than exact.

Verbatim comments have been included in this report to illustrate and highlight key points, whether they are important because they are shared by a large number of participants or because they reflect the strong views of a smaller subset. Where verbatim quotes are used, they have been attributed to respondent type, as there is risk that extra detail may risk revealing the identities of participants.

Another consideration in the interpretation of qualitative data is the role of perceptions. Different outlooks on an issue make up a considerable proportion of the evidence presented in this study. It is therefore important to bear in mind that although these perceptions may not always be factually accurate or logical, they accurately reflect the views of the participants, as they personally expressed them, at the point of data collection.

Additionally, in this research, each different audience could be expected to have different perspectives based on their personal interests. For example, it would be reasonable to presume that MHIs, concerned about the future of their role and employment conditions might emphasise the importance of independent post mortem inspection, or that FBOs might downplay the role of an OV, given the power that the OV has to take enforcement action against a plant. Rather than speculate on the underlying motivations in every instance we have instead made it clear to the reader which type of respondent expressed a particular view, and where a specific background issue was likely to be salient, we have flagged this.

## **Research challenges**

The most important methodological challenges and the measures taken by the research team to address them are outlined below. Please see the technical report for a more detailed discussion of these and other methodological challenges.

## **Ensuring researcher understanding and knowledge surrounding slaughterhouse and regulatory context**

The core research team carried out a detailed document review at the outset of the project. The findings from this, along with those from the key informant interviews, were used to inform a detailed methodological plan which was circulated to the steering group for review. This plan was then circulated to the wider fieldwork team along with a comprehensive briefing document to ensure that all of the team had a sufficient knowledge of the slaughterhouse and regulatory context. The core project team were taken on a guided tour around a slaughterhouse before their first fieldwork visit and briefed the rest of the team on this, as well as screening a filmed documentary about the slaughtering process, which ensured that all researchers who undertook fieldwork were prepared for what they would encounter.

## **Ensuring a valid sample**

The key variables above allowed for the stratification of the FSA database of slaughterhouses. Once the key variable quotas had been decided with FSA, the database was stratified by Ipsos MORI and a sample was randomly selected from within each stratum to ensure that researchers had sufficient leads to recruit. We then recruited to quota from the sample. Care was taken during the recruitment process to explain the research in clear terms and ensure that the FBOs understood that the researchers were independent, and that the research was exploratory. The research team is satisfied that this meant that those who agreed to take part represented a range of slaughterhouses and FBOs, rather than just those with a positive attitude towards regulation. Most of those who refused to take part did so on the grounds that they were too busy, or for other practical reasons. Where specific people declined to be interviewed in specific slaughterhouses, this was taken into account in analysis of that site.

## **Minimising the impact of a researcher's presence on respondent behaviour**

Researchers explained the purpose of the research in clear language from the outset, starting with the introductory letter, in recruitment phone calls and introductory chats with the key respondents. This allowed researchers to reassure those involved both prior to the research and during the fieldwork visit. Researchers were flexible during the visits; arranging interviews and observations to minimise disruption on the business and regulatory work. Observations were carried out in silence to minimise the observation effect on data and ensure that workers were not distracted.

## **Minimising researcher subjectivity**

A structured approach was taken to data collection to ensure that the research questions were explored in a similar way in all the slaughterhouses visited, which allowed researchers to give each case study equal weight during analysis. Fieldwork was conducted by pairs of researchers which helped to limit subjective bias in the reporting of each case study. Weekly group analysis meetings were held throughout the fieldwork period to allow all of the researchers involved to share of initial findings, encourage each researcher to challenge their own assumptions about the findings and consider a number of possible interpretations and begin sorting the data into themes which could be used at subsequent stages of analysis.

## **Ensuring quality of data collection and analysis**

To ensure the quality of data collection, topic guides for the in-depth interviews focusing on the research questions were developed before fieldwork. As outlined above, we also created an observation aide-memoire to record notes during fieldwork.

To minimise researcher subjectivity during analysis and interpretation of research findings, we chose to use paired-researcher visits. During the visit itself, and at the end of each day, researchers shared initial insights on the basis of interviews and



observations. This encouraged a discursive approach to analysis and provided a useful element of peer feedback.

During fieldwork the team met weekly, and at the end of fieldwork the full team met for structured analysis sessions. Constantly updating the project team on new fieldwork findings, sharing stories from the field and drawing comparisons between the data allowed the project team to develop thinking and begin the process of sorting data into themes which could be used for subsequent analysis sessions. This iterative approach to analysis allowed the research team to develop hypotheses which were then tested in the later stages of fieldwork. For example, one of the key topics of interest explored further following initial analysis was how 'food safety' was defined and understood by each audience and how this affects behaviour.

At the outset it was agreed with FSA that interviews would not be transcribed as it was suggested by key informants that some recordings may be unusable due to noise levels in the slaughterhouse, and it was anticipated (correctly), that a large number of respondents would not wish to be recorded due to concerns about privacy. Therefore, researchers took detailed field notes including short verbatim quotations while conducting the case studies and also, after each visit was completed, filled in a structured notes template. This pro-forma (in Word) focused on the research questions but also provided space to record other thoughts and observations thus allowing comparisons to be made between interviews and across slaughterhouses.

Analysis of detailed case-study write-ups including verbatim quotations allowed report writers systematically to cross-check common themes and interesting outliers (i.e. views of a sub-group where they differ from the whole) and understand the context and meaning of interviewees' comments, as well as deriving the maximum value from of the data collected.

## 1.4 Report outline

This report is structured as follows:

### **Section A: Introduction**

Chapter 1: Background and methodology – this chapter outlines the policy background to and objectives of the research, and gives an overview of the methodology adopted to answer the research questions.

Chapter 2: Key audience profiles – this provides an introduction to the different groups of people who took part in the site visits, including officials, FBOs and slaughterhouse staff.

### **Section B: Ownership of food safety**

Chapter 3: The drivers of, and barriers to, taking ownership of food safety - this provides an overview of the most important factors influencing whether or not management and staff take ownership of ensuring food safety within their slaughterhouse.

Chapter 4: Views of food safety – this provides a brief overview of how food safety is understood and affects behaviours.

### **Section C: Relationships and their determinants**

Chapter 5: FBO mindsets and their effect on staff – this describes the three main mindsets FBOs have with regard to their attitudes towards compliance with regulations.

Chapter 6: Officials' approaches – this looks at the different approaches officials adopt in conducting their regulatory duties in slaughterhouses and characterizes the relationships between officials.

Chapter 7: Relationships between officials and FBOs and staff – this looks at how mindsets and approaches interact and the other factors that can affect these relationships.

### **Section D: Views of regulation and future regulation**

Chapter 8: Views on the current regulatory regime – this examines participants' views of the current regulatory regime and its impact.

Chapter 9: Improvement to the current regime – this considers suggested improvements to the current regime.

Chapter 10: Conclusions and recommendations – this considers the key findings of the report and suggest a number of changes within the current regime and some evidence gaps it would be useful for the FSA to address.

### **Section E – Appendices**

## Chapter 2: Key respondent profiles and roles

This Chapter provides a brief overview of the key players involved in, and directly affected by, the delivery of official controls. The respondent types discussed in this Chapter are:

- Official Veterinarians (OV)
- Meat Hygiene Inspectors (MHI)
- Food Business Operators (FBO)
- Slaughterhouse staff
- Plant Inspection Assistants (PIA)

### Key findings

- OVs saw their primary role as safeguarding public health and animal welfare by ensuring that the slaughterhouse complies with regulations via use of informal or formal action. MHIs saw their role primarily as ensuring that all meat that enters the food chain is FFHC by carrying out a thorough post mortem inspection. Officials therefore see the focus of their role as protecting consumers.
- FBOs described the most important aspect of their role as the provision of high-quality meat to customers, either directly to the consumer or to retailers. As a result, they were usually focused on quality as a means to developing business and generally dependent on good customer feedback to retain custom.
- Staff in slaughterhouses tended to see their role as “getting the job done and getting home”. However, they had a wide range of expertise and training which affected their views of their roles. Staff were typically more highly skilled and experienced in red meat slaughterhouses, carrying out more task-based roles in white meat plants.

### 2.1 Official Veterinarian

#### Profile

The OV is the lead official in the slaughterhouse, responsible for carrying out ante mortem inspection on all animals. In all but two of the slaughterhouses visited as part of this research, an OV was on site at all times while the slaughterhouse was in operation. In several plants with low throughput, the OV also took on the task of

post mortem meat inspection. OV's tended to be people who had come to the UK from other EU countries. Officials and some slaughterhouse staff described a reliance upon overseas individuals with a veterinary background to deliver official controls in slaughterhouses (i.e. public health) since they thought that similar qualified GB nationals would prefer to establish themselves in a veterinary practice. For a discussion on the observed impacts of this arrangement refer to Chapter 7.

Some had previously worked in veterinary practices or as farm vets, while a small number had experience of working as an OV in their country of origin. The OV's spoke of different motivations for moving to the UK to work in slaughterhouse regulation including hoping to improve their English language skills, a desire to experience another culture and a lack of available jobs in their home country. Most had already worked as meat inspectors for at least several months before they first arrived in the UK and, subsequently, had trained as OV's in the UK on a three week course.

It appears the set-up is different in Northern Ireland plants; the OV's were either UK or Irish nationals and came from either a meat inspection background or farm practice. They had been OV's for at least a decade and, as a result, had significant experience of slaughterhouses and their regulation. The gender split was roughly equal.

In some plants (located across Great Britain), the OV's with whom we spoke had not been in place for very long (a number of weeks or a few months) and therefore could not talk in detail about the compliance levels and social context of their current base plant (although many described conditions at other plants in which they had previously worked). In other plants, OV's changed on a regular basis, or the role was shared by different OV's who worked on different days. This lack of consistency was identified as a key source of frustration among FBOs.

### **Own view of role**

OV's generally saw their primary role as safeguarding public health and animal welfare. These OV's explained this reflected their understanding of the legislative intent. They thought that the main way in which they did this was by ensuring that the slaughterhouse complies with regulations via their own use of informal or formal action. Their view of the tipping points for the escalation of enforcement action depended both on their own approach to their job and the mindset of the FBO (see Chapters 5 and 6). OV's usually described consciously trying to take a risk-based and proportionate approach but often had very different interpretations of what this meant. In general, OV's placed emphasis on carrying out ante mortem inspection, while the amount of time they spent in the production area (the process of stunning to refrigeration) varied.

OV's commonly described taking pride in their role and hoped still to be working as an OV in the future. However a number of OV's who had been in place for several years were less satisfied with their role. They were often frustrated in having to focus on food safety rather than making full use of their veterinary training. This

group thought that being an OV had led to their deskilling and would, therefore, make it harder to work for a practice or as a farm vet in the future. We discuss the possible effect on ownership of food safety caused by longevity or turnover of officials in Chapter 3.

### **Others' view of role**

Descriptions of the OV's role by FBOs and staff centred on their day-to-day work (conducting ante mortem inspections, etc) rather than the outcomes of their role (safeguarding public health and animal welfare). They were described as being in the slaughterhouse to ensure regulations are adhered to. As a result, OVs are usually seen as powerful by other key players in the slaughterhouse as they have the ability to stop production (which it was believed would seriously damage the business), or even to revoke the slaughterhouse's "licence"<sup>19</sup>.

"If they shut us down I lose my job ... it's always been like that."

Employee

Other players often described having difficult relationships with OVs, usually where the OV was viewed as lacking authority (i.e. the power to influence other slaughterhouse staff and officials). The authority of the OV could be undermined in the eyes of other key players if they were perceived either to lack credibility due to limited (or no) slaughterhouse experience, or to make decisions about how to apply regulations inconsistently.

In many plants, the presence of the OV is simply tolerated, though in some it is actively appreciated, depending on the mindset of the FBO and staff and the approach the OVs take to their jobs (see Chapter 6).

### **Views of official veterinarians from overseas**

In general OVs drew more criticism from FBOs and slaughterhouse staff than MHIs which as might be expected may be due to the fact that it is the OV who has the final say on whether enforcement is necessary. This aside there was genuine concern about the performance of OVs from overseas for the reasons outlined below:

Many participants believed that overseas OVs had limited understanding of the UK meat industry. As a result they thought that suitably trained staff could conduct some of the OVs tasks (especially ante mortem inspection) more effectively and efficiently.

The technical skills of overseas OVs were often questioned by FBOs which in many instances seemed to undermine their credibility and influence. Some FBOs in small and medium-sized plants explained for animal health and welfare issues (e.g. diagnosing TB) they would rather call on the services of their "farm vet" whose advice they considered more trustworthy.

<sup>19</sup> The correct term is 'approval' however this it is reported in the language used by respondents.

Moreover, some MHIs and FBOs thought that overseas OV's lacked the ability to adequately conduct evisceration techniques which are crucial for assessing whether a carcass is FFHC. This would often cause widespread frustration because despite apparent lack of trade skills, OV's had the final say in whether meat should be disposed of.

Some FBOs complained of communication difficulties with their officials, though in many cases this seemed to be driven by their reaction to the officials' approach, rather than xenophobia. By contrast, where the official was viewed as experienced and knowledgeable, relationships tended to be better (whether the official in question was British or otherwise).

## 2.2 Meat Hygiene Inspector

### Profile

The MHI carries out the post mortem inspection on each carcass in red meat slaughterhouses, and some MHIs work in white meat plants, although in many such plants PIAs perform post mortem inspection. The number of MHIs in a plant varies (it ranged from one to six in the plants visited), and no clear connection with throughput levels was observed. MHIs who worked alone tended to find the job more difficult than those who had support on the line (see Chapter 6).

Many of the MHIs that took part in the research had previously worked either as slaughterhouse staff or butchers before undertaking training in meat inspection. They described this training as lengthy, having taken one to two years at night, involving several hundred hours experience on the line.<sup>20</sup> These MHIs tended to be direct employees of the FSA.

Researchers also spoke to MHIs who were employed by contractors. They tended to come from similar backgrounds to OV's, i.e. had completed veterinary training in a different EU country than the UK. Most had then completed a five week course in meat inspection and a certain number of hours training on the line. There was sometimes tension between these MHIs and those employed by the FSA, with the latter sometimes viewing the former as lacking sufficient expertise to carry out the role, describing incidents in which they have had to offer advice or on-the-line training in order to "bring them up to speed". Sometimes cultural and language differences were also mentioned as the causes of tension. In a small number of

<sup>20</sup> MHIs could have been trained in various different ways depending on when they undertook their training and whom provided it:

- Pre 1995, under local authority system of night classes for two days per week for two years taught by Local Authority meat inspectors.
- MHS system, involved university training for approximately 10 months (full time)
- From April 2013, a National Vocational Qualification system (Level 4 Diploma in Meat Inspection) from the Royal Society for the Promotion of Health, which involves the undertaking of a specific number of practical and theoretical hours of training (c.900 in total) and the passing of a test set by the Competent Authority (the FSA).
- Those who hold a veterinary degree from an EU country can complete a shorter familiarisation/foundation course in order to register to work as MHIs.

cases, it seemed that broader concerns about the privatisation of the meat hygiene service may have been driving the tension between the two different types of MHIs.

### **Own view of role**

Most MHIs described their primary role as ensuring that all meat that enters the food chain is FFHC by carrying out a thorough post mortem inspection (which the health mark represents). They simply said this reflected the training they received and that applying these skills helps to ensure that the general public is adequately protected from food safety risks (largely as a result of faecal contamination) in slaughterhouses. They usually described their job as highly skilled, although some thought that others in the slaughterhouse, particularly OVs, did not always appreciate this. Often they saw themselves as production experts, in contrast to OVs, who were seen as animal experts. MHIs thought that they provide a professional, impartial service to slaughterhouses, and most spoke with pride of their independence, but also noted it can be hard to retain.

Though many preferred to work independently, some took a broader view of their role and see as assisting the OV in the delivery of all official controls. Others noted that they sometimes go beyond their job specifications while working on the line (discussed further in Chapter 6), either by trimming carcasses to ensure that they are FFHC or adding value to the product, for example by pointing out quality issues to staff on the line.

### **Others' view of role**

In general, the other players in the slaughterhouse respected MHIs as technical experts, and acknowledged their expertise in identifying disease and carcass contamination. Their role was seen as particularly important by FBOs, many of whom believe that the health mark being added by an independent official adds value to their product. For a more detailed discussion of the meaning and implications of FBO view on the "health mark" see Chapters 5 and 8.

MHI's physical presence on the line was observed to facilitate engagement and dialogue with staff, most of whom perceive them as hard workers and, in some cases as educators. A very small number noted that the presence of the MHI helped mitigate pressure from the FBO to increase line speeds or cut corners in food safety management. Sometimes however, the difference in pay and conditions led to some resentment, as MHIs are seen as being better rewarded for the 'same amount' of work as staff on the line.

OVs tended to respect MHI's technical expertise and ability to keep up with the line

"I could not deal with this line ... it is too speedy, but they can."

OV

However, OV's sometimes did not view them as partners in a regulatory team; in essence 'leaving them to it' on the line (see Chapter 6.5).

A small number of key players did not particularly respect the role of the MHI. These were FBOs who were keen to cut costs in their plants. In such plants, staff were encouraged not to see MHIs as their superiors and not to take direct instruction from them. In some other plants, a small number of staff with decades of experience described the MHI role disparagingly, claiming that it wasn't "rocket science" and that most skilled slaughter staff could carry out post mortem inspection just as well.

## 2.3 Food Business Operator

### Profile

The FBO is the person within the slaughterhouse with the legal responsibility for ensuring that official controls are complied with. In most small and medium-sized plants this was typically the owner or part-owner. Usually, such FBOs had worked in the meat industry for all their adult lives. In some cases they may have worked elsewhere before returning to run a family business after the retirement or death of a previous FBO.

In larger plants, the FBO was usually the general manager, who often employed a technical manager or quality assurance staff member(s) to assist with overseeing compliance. Some FBOs in these plants had 'risen through the ranks' having originally started working on the line, while others were younger and came from a business or management background and had completed a management training programme run by the parent company of the slaughterhouse.

In a small number of plants the official FBO was observed to have less influence on staff behaviour and compliance than another family member who was also heavily involved in running the slaughterhouse.

### Own view of role

FBOs described the most important aspect of their role as the provision of high-quality meat to customers. As such, they were usually focused on quality and sales, and highly dependent on good customer feedback to retain custom. For a more detailed discussion of the meaning and implications of FBO view on producing "good quality meat" see Chapters 5 and 8.

While a good end product was important for such FBOs, perhaps as might be expected, the main focus seemed to be staying afloat; indeed many spoke about the competitive pressures of the industry as a result of meat produced by other GB slaughterhouses as well as from imports, and the difficulty they had staying competitive, which sometimes had implications for their view of the costs of official controls.

Those with contracts with large or high-quality retailers often thought a large part of their role was keeping up with standards set by these customers. FBOs with



contracts with large retailers also concentrated heavily on animal welfare, as this is currently seen to be a key focus for retailers.

FBOs in rural, farming communities tended to be proud of the animal welfare at their plants and see it as an important part of their role. Several of the FBOs who were interviewed supplied their own butcher shops which also led them to see food safety as important, as it would impact on repeat custom.

FBOs often did not work on production line, although typically said they conducted regular spot checks. In small/medium slaughterhouses, FBOs tended to trust staff to deliver the “high-quality” meat their customers demand with minimal supervision.

FBOs generally understand their legal responsibility for food safety but sometimes this does not translate into action i.e. they do not see it as part of their role to ensure it, typically because of the presence of officials on-site (see Chapter 6.1).

### **Others’ view of role**

Officials viewed FBOs as being legally responsible for food safety and animal welfare but often noted that turnover can be a higher priority.

“This is a business, hygiene is secondary.”

OV

Officials thought that FBOs often do not fully take ownership of food safety for two main reasons; either they view animals and meat solely as a commodity, or their expertise and knowledge of the meat industry and slaughtering had led them to become “stuck in their ways” and thus unwilling to consider new approaches to reducing risks. Younger or better educated FBOs were seen by some officials to be more willing to build good working relationships and thus thought to respond better to advice and enforcement.

Particularly in small- to medium-sized slaughterhouses with longstanding employees where the atmosphere among workers is familiar, staff tended to be very loyal to the FBOs and described them as carrying out a very demanding role in challenging circumstances. However, staff in a small number of slaughterhouses of all sizes held the view that the FBO’s role is to maximize profit, which meant that they viewed the permanent presence of officials as very important and the officials as their allies in producing safe meat.

## **2.4 Slaughterhouse staff**

### **Profile**

Slaughterhouse staff carry out all tasks throughout the slaughterhouse from unloading animals to cleaning up after slaughter. In general, we spoke to those

who work directly in the lairage<sup>21</sup> or on the line, supervising the animals, slaughtering or dressing the carcasses. In some larger plants, interviews were conducted with some technical staff, quality assurance staff and supervisors.

In small and medium-sized slaughterhouses, especially those which may not have taken on any new staff in recent years for economic reasons, employees tended to be family members and people from the local area who had started working in a slaughterhouse directly after leaving school. In slaughterhouses of this sort the workforce was predominantly male.

In other slaughterhouses, the workforce was more mixed, both by nationality and gender. Often staff were hired from agencies or contractors, although this did not mean that the workforce was transient. Indeed, FBOs pointed out that their employees tended to stay in post for several years, even where their role is unskilled - possibly due to lack of other employment opportunities in the predominantly rural areas in which most slaughterhouses were based.

### **Own view of role**

Staff in red meat slaughterhouses tended to describe their role as a skilled occupation. They usually saw it as their responsibility to present clean and well-dressed carcasses for inspection by the meat inspectors. Through long-term experience, they thought that they had gained knowledge of animals and the meat industry and, as such, saw themselves as experts in meat production. These staff sometimes noted that their pay had deteriorated since they first started working in the industry, but said that they had stayed at plants due to lack of other work, and sometimes from a sense of loyalty:

“I’m here 31 years now ... it’s like being married.”

Employee

A few staff members in large red and white meat plants spoke about progressing to a higher pay scale as they developed their technical skill and knowledge of production. For example, one respondent explained that they were initially employed to carry out operational cleaning then in time they progressed to dressing and finally, after several years, to a quality assurance role.

In larger plants, particularly white meat plants, the majority of staff were more task-driven. Operatives in such slaughterhouses generally did not speak about having a sense of personal responsibility for the overall quality of the end product, although they described feeling a great sense of responsibility for fulfilling their discrete tasks to the highest standard and keeping the line moving at its regular pace.

---

<sup>21</sup> After transportation, animals are usually kept in the lairage (holding pen) for a period before being slaughtered.

## Others' view of role

FBOs in red meat plants generally regarded their workforce as loyal, hard-working and skilled. In larger plants there tended to be a less personal relationship between staff and FBOs, and FBOs acknowledged that staff have a very difficult and monotonous job.

In general, OV's thought staff fulfilled their roles diligently, including animal welfare and food safety related tasks. However, OV's sometimes described more experienced employees as "stuck in their ways" which could make engagement with officials difficult and also meant that they lacked understanding of how to ensure food safety throughout the plant.

MHIs believed the role of staff in food safety is to take the corrective action to which they are instructed by the officials and, in general, MHIs thought that instructing staff to take corrective action on the line (thus fulfilling their role of ensuring carcasses are FFHC) is straightforward. However, some gave examples of slaughterhouses where this might not be the case and where staff could be described as bullying officials. Various reasons for this bullying were described, including staff not agreeing with officials' decisions to detain carcasses, staff thinking that MHIs are not working fast enough and disputes over who should be trimming carcasses (staff or MHIs). A more detailed discussion surrounding the implications of MHI trimming can be found in Chapter 6.1.

## 2.5 Plant Inspection Assistants (PIAs)

### Profile

PIAs are direct employees of the FBO who carry out post mortem inspections in poultry slaughterhouses. In some plants, FBOs have made the decision to retain independent inspectors though, where this is the case, the speed of the line means that the Poultry Meat Inspector's job is necessarily limited to carrying out post mortem checks.

PIAs were usually former line operatives who had been given extra training (a mixture of classroom and on the line) at the expense of the FBO. Some also continued to work as line operatives for part of their shift or while working as PIAs, for example removing offal and trimming while carrying out their inspection duties.

22

---

<sup>22</sup> Det Norske Veritas, 2011. Poultry Post mortem Inspection by Plant Inspection Assistants without the Permanent Presence of Official Veterinarians. Report for the Food Standards Agency: Project code MC1004. [online] Available from [http://www.foodbase.org.uk/admintools/reportdocuments/701-1-1187\\_MC1004\\_Final\\_Report.pdf](http://www.foodbase.org.uk/admintools/reportdocuments/701-1-1187_MC1004_Final_Report.pdf)

This review suggests that it is unlikely that there is any significant risk difference between post mortem inspection of poultry carried out by PIAs or PMIs and concluded that there would be no significant increase in risk with a reduced OV presence during post mortem inspection of poultry by PIAs, provided that the FBO management systems were adequate. However it was considered important that the inspectors (whether PIAs or PMIs) had access to veterinarian advice and support if needed. It is unclear whether this would be true in red meat inspection plants (see evidence gaps section).

### **Own view of role**

Most PIAs saw minimal or no difference between their role and those of other operatives on the line. PIAs were solely focused on spotting abnormalities in carcasses and did not hold any wider responsibilities for food safety throughout the plant. In some factories, due to the speed of the line, carcasses were double-checked by other PIAs further down the line (sometimes on an ad hoc basis).

PIAs usually reported to their supervisor on the production side in the first instance, and reported variable levels of interaction with OVs, usually depending on the OV approach to the job and the extent of the OV's presence in the production area (see Chapter 6.4).

### **Others' view of role**

FBOs described PIAs as fully independent and claimed never to put pressure on them to reduce levels of condemned meat. However, FBOs spoke about PIAs in the same terms as other production staff and did not always fully differentiate between staff and inspectors (in contrast to the obvious differentiation between MHIs and staff in other slaughterhouses).

While OVs seemed to be satisfied with the performance of the PIAs in their base plants, some questioned their level of training, which seemed to be highly variable. OVs noted that this role requires much less knowledge and skill than that of MHI in a red-meat slaughterhouse, and questioned whether such a model would be applicable outside of poultry plants (see Chapter 8.1 for views of the industry taking more responsibility for the delivery of official controls).

The background is a solid red color. On the left side, there is a complex, abstract graphic consisting of numerous white lines of varying thicknesses and lengths. These lines are interconnected by small white dots of different sizes. Some lines are straight, while others are curved, creating a sense of movement and connectivity. The overall effect is reminiscent of a network diagram or a stylized map.

Slaughterhouse social science research project: Section B

# OWNERSHIP OF FOOD SAFETY

## Chapter 3: The drivers of and barriers to taking ownership of food safety

This Chapter provides an overview of the most important factors in whether or not management and staff take ownership of ensuring food safety within their slaughterhouse.<sup>23</sup> The EU food hygiene regulations require that FBOs are responsible for the establishment and operation of food safety management procedures in slaughterhouses.<sup>24</sup> Hazard Analysis and Critical Control Point (HACCP) provides the framework for the planning and implementing of FBO food safety obligations.

### Key findings

- Ownership of food safety is affected by a wide range of factors (outlined below). It is not possible to pinpoint one key reason that explains ownership in any plant as each has different risks, staff and FBO knowledge, attitudes and mindsets, resources, suppliers, customers and officials' approaches. The evidence suggests that ensuring that every FBO takes full ownership in each slaughterhouse may require a range of tailored approaches, based on an individual appraisal of all these factors. One key criticism of the current regulatory regime is that it is "one-size fits-all" and fails to recognise the differences in compliance behaviour between slaughterhouses.
- As outlined in Chapter 4, FBOs also have different understandings of food safety and this in itself can be a key barrier with regard to taking full ownership of food safety.
- In almost all plants where the FBO could be described as taking full ownership of food safety, their relationship with customers was described as their main motivation in business. This was particularly the case where customers are either:
  - c) Large supermarkets, who demand external and last-minute audits and can remove business suddenly, or
  - d) Local customers on whose ongoing satisfaction the reputation of the slaughterhouse depends.

Each slaughterhouse visited had unique structures, processes and relationships. Despite the variety and complexity several patterns could be discerned

<sup>23</sup> There is no formal definition of 'full ownership of food safety' however for the purposes of this report it can be characterised as the systematic and continuous assessment and management of risk.

<sup>24</sup> Regulation (EC) Nos. 852/2004, 853/2004 and 854/2004.

throughout, for example there were some recognisable approaches to regulation seen among officials across different slaughterhouses, and three different broad mindsets among FBOs were observed. However, there were also a number of other factors that seemed to affect how much ownership FBOs and staff took, which had more or less importance, depending on the specific slaughterhouse. These are outlined below, and most are explored in more depth in the chapters that follow. To summarise, the main drivers and barriers relate to:

- Views of food safety risks (of FBO and staff)
- Resources available
- Relationships with customers
- Perceptions of roles
- Relationship with officials

The **views of food safety risks** of the FBO and staff (as described in Chapter 4) are one of the most important drivers of ownership of food safety. FBOs are required by law to be taking a ‘whole process’ view of risks in the slaughterhouse. However, many FBOs take what they describe as a “common-sense” view of food safety, whereby “quality” meat that has minimal visual contamination which receives the health mark is safe enough. This is a strong barrier to them taking greater ownership of food safety throughout the plant. Similarly, those who believe that much of the risk to food safety lies outside the slaughterhouse are less likely to want to take ownership of the task of minimising risks within it. By contrast, several FBOs who seemed to take full ownership of food safety throughout the entire plant did so out of a desire to comply with regulation even where it was believed the risk was low.

Better **understanding of food safety risks by FBOs** can help to drive more ownership of food safety. In slaughterhouses where FBOs had previously worked as meat inspectors, relationships were often better as FBOs understood the reasoning behind regulations and officials’ requests, and could communicate food safety messages better with staff.

**Staff understanding** was seen by officials to be a particularly important driver of ownership in small and medium-sized plants. Staff in these slaughterhouses were thought to have more opportunity to spread contamination throughout the process as they move about more between different tasks and parts of the slaughterhouse.

Also small and medium-sized plants tended to lack the resources for **supervision of slaughterhouse staff**, so that their adherence to food hygiene processes is often not monitored closely. In plants (usually large ones) where the resource exists to employ technical staff, their presence leads to the creation of processes which meant that other staff may not need the same level of understanding as staff in smaller slaughterhouses. As discussed in Chapter 4 these employees tend to be task-focused and as such food safety can be better ensured through staff

behaviours being monitored and audited, rather than depending on their personal commitment to ensuring that risks are controlled.

Resource is another important driver of ownership of food safety. Where the costs of managing risks are seen to outweigh the benefits in terms of risk reduction, it seemed that many FBOs may be unlikely to take action. This tended to be the cause of resistance to carrying out enforcement actions around the conditions of the building structure and maintenance requested by officials. As discussed in Chapter 8 this resistance seems to be largely caused by some FBOs having a limited understanding of the possible development of pathogens in certain areas of the buildings of the slaughterhouse such as the floor, walls and ceilings. This limited understanding underpins concerns around the cost of compliance, and can drive negative attitudes towards regulation, officials and the FSA more generally.

Small and medium-sized slaughterhouses were most likely to lack the resources to take full ownership, as they usually cannot bear the cost of employing technical staff or supervisors who do not also need to work full time on the line. As a result, excessive line-speeds and poor evisceration practices were common in these plants due to staff being distracted from their task of supervision or technical assistance.

**Relationships with customers** also play a key role in driving ownership. In almost all plants where the FBO could be described as taking full ownership of food safety, their relationships with customers were described as their main motivation in business. Where those customers are supermarkets, the expectation among FBOs of short notice audits and the potential for sudden removal of business drives FBOs to put robust food safety processes in place. At the other end of the scale, proximity to local customers means that FBOs in smaller slaughterhouses appear to focus on providing a high-quality and safe product as a means to retain their existing customers. As a result, these FBOs put a huge amount of emphasis on their reputation because customer satisfaction can help them retain customers while they hope that word of mouth helps them grow their business. By contrast, in some small and medium-sized slaughterhouses, which have a more unstable customer base, or whose customer focus is price over quality, FBOs sometimes question the value of doing more than is necessary to ensure that the meat achieves the health mark.

Another driver is **perceptions of the roles** within the slaughterhouse, and the lack of ownership for food safety often caused by a belief that “someone else will do it”. The permanent presence of officials was seen to undermine legislative intent by acting as a barrier to taking ownership of food safety. While FBOs described ensuring food safety as their responsibility, their actions sometimes contradicted this, as they failed to put in place adequate processes or provide sufficient supervision of the line to ensure that risks were being contained by production staff. In some cases, this was simply because staff knew that the officials would do it for them (see Chapter 6.1). In others the FBO questioned why they should have to do certain tasks when the officials whose presence they are obliged to pay for could easily do it themselves (i.e. they think that the officials should be taking ownership for ensuring food safety). A good example is trimming



prior to application of the health mark, which many FBOs felt should be done by MHIs, given that they are already on the line and have to inspect each carcass. The lack of MHI consistency within and across plants in this practice leads some FBOs to believe that it is not their responsibility.

However, depending on the **officials' approaches**, their permanent presence can also act as a driver of the level of ownership of food safety an FBO takes. If they are able to command respect, clear communication by officials as to the responsibilities of the FBO, and the reasoning behind those responsibilities, can drive more positive attitudes towards compliance and taking ownership of food safety. However, officials who are seen as "hard-line" or "nitpicking" enforcers can act as a barrier as their approach is seen as disproportionate by FBOs, particularly those who lack understanding of how some regulations relate to food safety. That said, in medium-sized slaughterhouses, especially those with an unstable customer base, FBOs appeared to abdicate ownership for food safety to officials regardless of the approach taken by officials due to other more perceived to be pressing issues such as sales.

The **perception of officials as consistent and proportionate** in their interpretations of regulations and enforcement approach can also drive more positive attitudes towards compliance and taking ownership of food safety (see Chapter 7). In addition, **longevity of officials** can aid the good relationships necessary for the officials to help to educate and advise FBOs and staff, although the extended duration of officials in post can potentially lead to stagnation in standards in slaughterhouses where relationships between officials and FBOs or staff are bad. This is because an impasse can be reached whereby it is difficult for the officials to drive any further improvement in standards. It can also lead to complacency and dependency on officials where officials take on responsibilities that are, by law, those of the FBO or staff. Relationships between officials and FBOs and their effect of ownership of food safety are described in more detail in Chapter 7.

## Chapter 4: Key respondent types views on food safety

This chapter outlines the ways that the key players talked about food safety. There was some overlap between the views of different players (with some FBOs taking similar views to some OVs etc). Therefore, the first part of the chapter outlines the four ways we observed key players talking about food safety, and the second part of this chapter looks at which perspectives were observed in each type of key player.

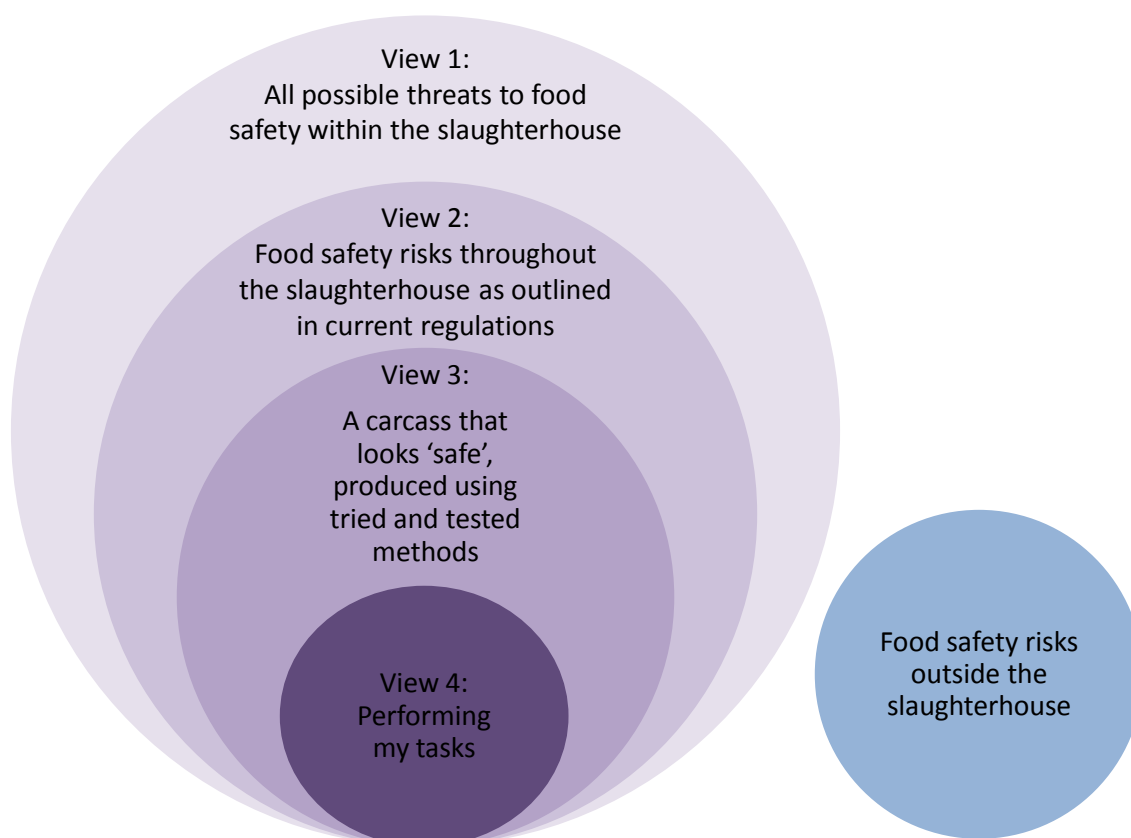
### Key findings

- FBO and staff views of food safety were found to be one of the most important drivers of taking ownership of food safety. Many FBOs took what they described as a “common-sense” view of food safety, whereby their responsibility is to produce “quality” meat that has minimal visual contamination and can be passed by MHIs as FFHC. This can be a barrier to them taking full ownership of food safety (as defined by FSA) and ensuring that they and their staff have a good understanding of the critical control points throughout the slaughtering process and how to control risks.
- Better understanding of food safety risks such as risk of contamination caused by the spread of microbiological pathogens by FBOs can help to drive more ownership of food safety, as it means that FBOs understand the reasoning behind regulations and officials’ requests, which in turn means they can communicate food safety messages better to their staff.
- Many FBOs took what they described as a “common-sense” view of food safety, whereby their responsibility is to produce “quality” meat. By “quality” meat they meant meat that looks good for the consumer, has been properly eviscerated and that has minimal visual contamination and therefore can be passed by MHIs as fit for human consumption (FFHC). For these FBOs, FFHC is seen as safe enough, and as a result thought that food safety management throughout the plant was less important than ensuring that carcasses pass post mortem inspection.

### 4.1 Descriptions of food safety

Food safety was defined differently by different actors within slaughterhouses. Detailed analysis of respondents’ descriptions of their attitudes towards, and behaviours with regard to, food safety, and the language they used around this topic, allowed researchers to identify four main views of food safety. Each of these corresponds to the scope of food safety as respondents conceptualised it. These different ways of understanding food safety are illustrated in the diagram overleaf.

**Figure 2: How food safety is understood by participants**



These four different ways of describing food safety and how to ensure it within the slaughterhouse are outlined below:

### **1. All possible threats to food safety *within* the slaughterhouse**

Those who describe food safety in this way tended to talk about not just the risks that are currently managed through official controls but all possible risks that are present throughout the slaughter process. They spoke about emerging risks to food safety, contingency plans, and the need for more and better targeted sampling and microbiological analysis. Usually, while adhering to enforcing current controls, those with this view of food safety questioned whether current regulations and food safety processes within the slaughterhouse have the right focus, and tended to be critical of the current regulatory regime. These issues are discussed in more detail in the subsequent chapters on regulation (Chapters 8 and 9).

## **2. Food safety throughout the slaughterhouse as outlined in current regulations**

Those with this view of food safety usually focused on measures currently taken throughout the slaughterhouse to ensure food safety. This included procedures to reduce and remove contamination from carcasses but also food hygiene measures and adequate temperature control. Those who spoke of food safety in this way stressed the importance of what is required either by regulations or by customers, i.e. food safety was seen as the outcome of doing things 'by the book'. In plants where the FBO has this view, particularly the larger ones, there is often a large amount of importance placed on the HACCP plan and there were many processes in place to ensure that it was adhered to.

## **3. A carcass that looks 'safe', produced using tried and tested methods**

This view of food safety was based in "common-sense" and most often encountered in interviews with those who had been in the meat trade for several decades either slaughtering, as meat inspectors, or as FBOs. On this view, meat that is clean, has been produced in a visually clean environment and is free from visual contamination is safe. Those who took this view tended to refer to "tried and tested" processes as well as their past experience. In their view, they had "never killed anyone" and thus *must* have been producing safe meat in the past and, therefore, do not need to change their practices in order to continue producing safe meat. However, producing safe meat was often just one component of producing "quality" meat that the customer would want.

## **4. Performing my tasks**

Some employees' view of food safety was limited to how the tasks that they perform may affect it. Often this was not fully articulated i.e. it was known that sterilising knives at regular intervals, or not opening up an intestine was important, but usually it was seen as important only because as part of the job. On this view, the overall responsibility for food safety is seen as resting on someone else (management or officials), although the employees may understand that they are helping to ensure it by following food safety procedures related to their tasks.

### **Food safety risks outside the slaughterhouse**

In addition, when discussing food safety risks, many key respondents (particularly FBOs and MHIs) talked about those that exist outside the slaughterhouse, both before the animal arrives and after the meat leaves. For some, this is particularly important as they wanted to emphasise that, in their opinion, the slaughterhouse is a low risk part of the food chain. Others, while noting that there are many significant risks to food safety in the slaughterhouse environment, thought that other equally significant risks are not adequately controlled outside it. For example, some thought that butchers are not adequately trained “these days” and that consumers do not understand how to handle and cook meat safely. If retailers were better trained and consumers better educated, then on this view there would be no risk to consumers from raw meat.

“Once the meat is cooked it kills it all.”

FBO

For FBOs, this can play into a feeling of being overregulated. A strong sense that food safety risks are not properly controlled at other parts of the process can lead to some cynicism about how much effort should be put into trying to control *all* risks within a slaughterhouse, especially given their belief that all risks could be eliminated if meat was cooked better in the home. However, many MHIs and some OVAs also talked about these other risks when discussing food safety. These issues will be explored in more detail in the subsequent chapters on regulation.

## **4.2 OVAs’ description of food safety**

OVs typically took Views 1, 2 or 3 to food safety. They noted that the food safety risks differ by animal species and size of plant, and that this needs to be taken into account when regulating different slaughterhouses.

Most who worked in large plants, and had knowledge of standards in smaller plants, were of the opinion that food safety risks are well-controlled and as a result more compliant than most small and medium-sized slaughterhouses. Small plants where staff move frequently between different roles and stations were seen as riskier environments due to the potential for cross-contamination.

Conversely, one OV noted that smaller size made it easier to communicate food safety messages to employees, and for the OV to monitor their behaviour closely. Medium-size plants were viewed by OVs as the most risky as they were seen to lack adequate supervision of slaughterhouse staff or effective processes.

### **View 2 (regulation-based)**

OVs tended to define safe food as that which has been produced in a slaughterhouse that complies with all of the regulations. A few argued that because you “don’t hear of food safety cases”, this is proof that official controls

are an effective safeguard against the entry of unsafe meat into the food chain. Strong adherence to this regulation-based view leads OV's to take the enforcer approach (see Chapter 6.3). This approach was thought by all players to be effective in slaughterhouses where the FBO shares this view of food safety. In plants with strict food safety procedures (typically large plants), this allows the OV's' role in ensuring food safety to become focused on checking that the processes and auditing are fit for purpose, rather than keeping a constant eye on the behaviours themselves. However, this view and its attendant approach can lead to problems in slaughterhouse relations where the FBO or staff take a different view of what is required to produce safe food.

Some OV's thought that their views on food safety were not the same as the FBO's or employees' of the factory. They were frustrated by the fact that although those who work in slaughterhouses have the knowledge and commitment required to produce a carcass free of visual contamination, they do not understand non-visual risks, and sometimes the importance of some basic hygiene factors.

### **View 3 (a 'safe' carcass)**

However, there are some OV's that take what they describe as a more "realistic" approach, and note that slaughterhouses that do not comply perfectly with all official controls can still produce food that is FFHC. For these OV's, the most important aspect of food safety within the slaughterhouse is ensuring that there is no contamination (i.e. view 3 above), as "that is what is going to kill people," and they concentrate their work on these areas i.e. doing spot checks of carcasses or observing the line.

"They are not perfect ... [but] I am happy with the quality of what they produce"

OV

None thought that the meat produced in their base plant was unsafe, partly because of the commitment, seen in all factories, to produce carcasses that are uncontaminated, and, as such, FFHC.

"I would feed my own children with meat from this slaughterhouse"

OV

### **View 1 (all risks *within* slaughterhouse)**

As described in Chapter 8, OV's were the respondent most likely to talk about the risks in the process that they think are not adequately controlled by current regulations. They tended to advocate changes to testing for microbiological threats throughout the production area including increase in the number of carcasses tested for bacteria campylobacter, salmonella, and E.coli, and the abandonment of testing for largely irrelevant pathogens (such as BSE) . They also argued for giving officials the power to carry out extra sampling where they think it

is necessary. This view has little effect on their day-to-day work, but can lead to feelings of both frustration and misplaced effort.

### 4.3 MHIs' description of food safety

Meat inspectors generally took either View 2 or 3, and this usually impacted greatly on how they carried out their role.

#### View 3 (a 'safe' carcass)

Those who took View 3 tended to describe their job wholly in process terms. In a good example, a PMI described ensuring that food was safe by checking for offal in the cavity and making sure the carcass was not visibly contaminated. For those with this view of food safety, the importance of the post mortem inspection and, as a corollary their role, lay in their ability to ensure that the carcass met the FFHC standard and resulted in the application of the health mark.

While understanding that there are microbiological and other invisible risks throughout the slaughtering process, these MHIs did not think it was possible fully to control risks to food safety in a slaughterhouse. Often MHIs used similar language to FBOs, arguing that proper cooking of meat would ensure that other risks are eliminated. A few MHIs who spoke about food safety in this way tended to conflate quality and food safety when speaking about a "good" carcass (as do many employees, see below).

#### View 2 (regulation-based)

MHIs who took View 2 spoke of the importance of all of the slaughterhouse regulations, with one describing a "quality" product as one where "all the regulations have been followed from the farm right through to the chiller". Such MHIs tended to take a more active role in the slaughterhouse in terms of monitoring the behaviours of employees on the line and carrying out checks (e.g. ensuring cleaning is sufficient or chiller temperatures are correct).

"Food safety is ensuring operational hygiene and temperature control"

MHI

Others who were of this view noted that they are limited in what they can truly do to ensure that the food is as safe as possible within the plant, not least by the demands of inspecting every animal, which usually requires constant presence at one station on the line. A few MHIs noted that for this reason they would like to see OVs take a more holistic view of risks to food safety within the plant and focus less on ante mortem inspection.

#### View 1 (all risks *within* slaughterhouse)

Less commonly, MHIs expressed View 1 and thought that the processes involved in the post mortem inspection were not always properly focused on key food

safety risks, and that the inspections should be modernised and re-focused. This did not affect their behaviour but did lead to considerable frustration with the limitations of their role, as they ideally wanted to be checking for the most likely contaminations or diseases, something they did not feel they were always doing.

Others (similar to OV's who held View 1) would like to see more testing for microbiological hazards. One example cited was when the green offal bursts upon landing in the offal tray; employees can do their best to clear the tray but, when intestines from the next carcass land in the tray, they may splash material onto the adjacent carcasses. In these situations the MHI can only ask slaughterhouse staff to remove visible contamination. An MHI with View 1 of food safety mentioned that it would be preferable to have the power to request testing of the potentially contaminated carcass(es) in these instances and did not think this was currently an option. This MHI was of the view that, at present, potentially contaminated meat may be verified as FFHC. Chapter 9 returns to respondent views of the limitations of the current inspection regime in effectively identifying microbiological pathogens.

#### 4.4 FBOs' description of food safety

View 2 and 3 were seen amongst FBOs, with a few also taking View 1.

##### View 3 (a 'safe' carcass)

Most FBOs in small and medium-sized plants focused on "quality" when describing how to ensure food safety (View 3). Producing a safe, "quality" product meant, for them ensuring "clean [visually] and presentable meat" and sufficient cleaning of the slaughterhouse on a regular basis. For most, they did this as they *"don't want anyone getting ill"*, although for some it was presented simply in terms of ensuring that the carcasses were FFHC as defined by meat inspectors, and, as such, saleable.

"My meat needs to be identifiable, clean, FSA-certified."

FBO

Carcasses were often talked about in terms of "quality". By "quality" meat they meant meat that looks good for the consumer, had been properly eviscerated and that had minimal visual contamination and therefore could be passed by MHIs as fit for human consumption (FFHC). For these FBOs, FFHC was seen as safe enough, and as a result thought that food safety management throughout the plant was less important than ensuring that carcasses pass post mortem inspection.

"By quality product, I mean no contamination, minimal trim on the carcass, that is what the butcher is looking for."

FBO



Often FBOs took personal interest in inspecting the quality of the meat, and thus were sure that their meat was, to their minds, safe. This was particularly the case where they were in close proximity to their customer base, typically in the smallest slaughterhouses.

“My next inspection is my next customer.”

FBO

FBOs who took View 3 claimed that, as a result of their focus on quality, they would be just as concerned with producing a product that is FFHC in the absence of officials as they are now, due both to their personal supervision, and the skill and experience of their staff. Some were also particularly dismissive of the HACCP approach, as they did not see the need to control risks in this way.

“I’m not into all that HACCP scores I’m into what you saw today [during observation of the plant].”

FBO

In a few plants, supervision of staff on the line was often minimal. In these plants, FBOs found it difficult to describe the overall risks to food safety beyond contaminated carcasses, and described their other processes for controlling risk as “generally keeping things clean”. On this more laissez-faire attitude towards food safety risks in the plant, the FBOs conceptualised their role as doing whatever they needed to do to ensure the meat meets the minimum standards of FFHC.

Many FBOs who took View 3 found it difficult to understand how some official controls relate to food safety, particularly when they may have been in the slaughtering business for several decades. As a result, officials’ insistence that certain regulations are complied with can be characterised by FBOs as “nit-picking” or simply officials’ personal preferences. For example, one FBO was asked to put up a plastic sheet in the chilling area to ensure that water from a spray hose used to clean off an adjacent area did not reach the carcasses and cause cross-contamination. While he did install the sheeting (after some resistance) and, as result, mitigated the risk of possible cross contamination he did not understand the reasoning behind the request, as on his view they had never needed a plastic sheet previously.

“Don’t know why [we had to put the plastic sheet up], we’ve always done it this way ... but it makes them [the OV] happy.”

FBO

“Splashing is cross-contamination. They didn’t believe me ... they told me ‘we always do it this way’.”

OV

FBOs who did not think that regulations around the condition of buildings have any bearing on the safety of the food that they produce thought that the FSA have an unwarranted preference for things that are “shiny and new”, which led to a resistant approach on requests to comply with such regulations.

Similarly, lack of understanding of how some FSA paperwork relates to food-safety risks coloured how seriously FBOs took keeping paperwork up to date. One OV described her frustration with FBOs who lacked proper systems for the paperwork for cattle for over 72 months, and their lack of understanding that this could lead to unsafe meat entering the food chain. However, the FBO in the same plant noted that he is required to record the temperature of carcasses every morning, which because it is rarely verified by officials, seems unnecessary to him. In turn, this made him less likely to want to keep up-to-date with other paperwork:

“I have to do that [store daily information on carcass temperature] for three years, what difference does that make?”

FBO

## **View 2 (regulation-based)**

On the other hand, there were FBOs who took View 2 when discussing food safety. This was particularly true of FBOs in large plants where there were the resources to employ technical staff to take full responsibility for controlling risks to food safety throughout the process. In the largest plants with supermarket contracts, this meant that FSA regulations around food safety were just part of an overall procedure-driven process where several sets of standards have to be met and are monitored and regularly audited by an internal quality team (quality controls, official controls, customer requirements, external association requirements).

“HACCP is the backbone of the factory, all customer specifications feed into the HACCP.”

FBO

However, it should be noted that in some larger plants this meant that the FBO spoke about risks to food safety in a less detailed manner than in the smaller plants, due to their distance from the line and the processes (some managers in these plants come from business backgrounds rather than the meat industry). These FBOs trusted their staff to ensure that all regulations were complied with, as opposed to FBOs who took View 3, who only trusted their staff to ensure that meat would pass post mortem inspection.

FBOs who took View 2 were sometimes of the opinion that FSA regulations are less demanding than the standards required by their customers.

### **View 1 (all risks *within* slaughterhouse)**

A few FBOs in small and medium-sized slaughterhouses also spoke about food safety as it relates to the entire process of food production. Some described doing more sampling on their meat than is required by the FSA. Others spoke in detail about hygiene requirements, and their own tight control over the line which enabled them to monitor how well these were being met.

“Key hazards are hairs on animal and clean structure but also simple things like regular hand washing vital – these things can limit things like salmonella and E-coli.”

FBO

In one small slaughterhouse, the FBO who was considering selling a part of the animal that had previously been disposed of described how he had actively sought the advice of the MHI on how to reduce the risk in handling offal that would subsequently enter the food chain.

Another less common view among FBOs was that the current regulatory regime is insufficient to control all risks throughout the slaughterhouse process. Where this was the case, they usually noted that microbiological testing is insufficient, or that regulations do not properly take into account the different risks attached to different species. Often these FBOs thought that they went above and beyond what the regulations required in their food safety processes in their slaughterhouse.

## **4.5 Staff description of food safety**

Staff views on food safety varied considerably according to experience, type of slaughterhouse and often according to the attitude of the FBO/management in that slaughterhouse. Many found food safety difficult to discuss, as this was not part of how they conceptualised their own work.

“This is a nice little job. You get in, head down, job done.”

Employee

In a small number of plants, employees used the language of risk and control points, but it was clear that this was exceptional within the industry. A more typical view was that ‘tried and tested’ ways are good enough.

“It’s all food safety [every aspect of their job] and it’s all common-sense.”

Employee

### **View 3 (a 'safe' carcass)**

In general, most of those who work on the line in red meat plants, when asked which of their tasks are more important in ensuring food safety, describe the visual state of the carcass (View 3).

“Presenting a clean and well-presented carcass for inspection.”

Employee

Many described the great care they take in ensuring that the carcasses are kept free from contamination, and in general had pride in the skilled nature of their work. Being “careful” was seen as a crucial attribute in a good slaughterhouse employee.

When probed further about food safety, many spoke about the potential to make someone ill, but this was not a top-of-mind concern when going about their daily tasks. They were, in general, focused on the visual; on avoiding sending out meat that doesn't “look right”. This chimes with how OVs described staff behaviour and understanding of the risks involved. Many officials described employees as seeing meat simply as a commodity, and thus focusing on the end-product without thinking about the other parts of the process.

“They do not have a clue ... they don't think that washing their hands or their apron is something that will make a difference.”

OV

This focus on the visual led to a similar conflation of safe food and good quality food outlined in the section above on FBOs' description of food safety. For many employees, good meat is, by definition, safe meat. In one example, employees who worked on the line described an OV request to take more care when de-hiding and de-hairing as an affront to their experience. This was seen as a criticism of their workmanship rather than a food safety related issue. Such employees described how much has improved in hygiene practices in the past ten to fifteen years and thought that they were reaching the limits of how much they could do.

“We can't do any more than we do now for food hygiene ... we're almost too hygienic now, we're terrified of it. We used to wipe the meat down with a mutton cloth and water. No one died from it.”

Employee

In general, staff understanding of food safety came from experience: “it's just what you pick up”. Many FBOs and staff with this view spoke negatively of formal training, noting that “foreign vets like training” but pointing out that they do not need instruction on how to do their job.

When probed, staff with View 3 were able to identify ways in which they identify and control risk, for example one employee in a very small plant described how

they segregate dirty animals and kill them last, taking more care and slowing down the line. However, they did not describe this as controlling a risk, but simply as a “common-sense” procedure that anyone working in a slaughterhouse would follow. Staff who take View 3 tend to be most resistant to food safety messages from officials.

#### **View 4 (performing my tasks)**

Many thought hygiene procedures were important because “the inspector would pick up on it” if they didn’t follow them. They simply “do what we’ve got to do” as it allows them to get on with their job and go home at the end of the day i.e. they are wholly task-focused in their work.

In some plants, the nature of the workplace meant that employees who work on the line have very repetitive jobs. Their view of food safety was thus limited to how the tasks that they perform may affect it. Often this was not fully articulated i.e. it was known that sterilising knives at regular intervals or removing intestines fully was important. When probed, most could identify the reason for this (“to make sure no one gets sick”) but this is not top of mind when performing the procedure. Thus, on this view, the overall safety of the food - and quality of the meat - is someone else’s responsibility. The risk inherent in this is that it requires either personal commitment to food safety procedures or managerial supervision of procedures in order to ensure that ownership of food safety is allocated.

#### **View 2 (regulation-based)**

Some employees in small- to medium-sized plants described the importance of broader hazard controls such as handwashing, knife-sterilising, wearing hairnets and wellies, changing clothing between different areas of the plant and cleaning. Some spoke of the food safety risks of neglecting such procedures, suggesting they had a better understanding than those who expressed Views 3 and 4.



Slaughterhouse social science research project: Section C

# **RELATIONSHIPS AND THEIR DETERMINANTS**

## Chapter 5: FBO mindsets and their effect on staff

In part, the previous chapter explored differing conceptions of food safety among FBOs. Given few FBOs take a holistic view of food safety, and given that officials are permanently present in all plants, in many slaughterhouses, food safety outcomes can often be highly dependent on the relationships between the officials and FBOs and staff.<sup>25</sup> Whether these relationships are effective or not is largely dependent on both the approach taken by the official and the mindset of the FBO. These mindsets and approaches are described in detail in this and the next chapter.

### Key findings

- It is possible to group FBOs into three main types of mindset, with regard to their attitudes towards compliance with regulations. These are:
  - **Resistant:** FBOs who lack the resources, knowledge and will to comply with all regulations. These FBOs usually had decades of experience and believed that they have always ensured that their meat is good quality and FFHC. They tended to resent the presence of the OV but valued the post mortem inspection carried out by the MHI as it adds an independent rubber stamp to reassure customers.
  - **Reactive:** These FBOs were willing to comply with regulations as far as is necessary to stay in business and not incur any reputational damage. However, they often lacked the knowledge or resources to do so. They usually tried to build up good relationships with officials and valued their advice and guidance as it helped them keep up to date with regulations. However, they can have bad relationships with officials they perceive to be disproportionate or lacking sufficient expertise for their role.
  - **Proactive:** These FBOs were willing to comply with regulations irrespective of the presence of officials and have the knowledge and usually the resources to do so. This mindset tended to be seen in (but was not limited to) larger slaughterhouses where strong external pressure from customers forces FBOs to run audit- and process-driven plants where FSA regulations are one of a number of standards that need to be complied with in order to retain business.

<sup>25</sup> Our approach did not allow for causation to be established i.e. we cannot say for certain to what extent food safety outcomes are dependent on the relationship within slaughterhouses. It may be that in some cases some other factors (i.e. those outlined in chapter 3) are more important. However our analysis indicates that in many cases these relationships did seem to be very important to food safety outcomes, and were perceived to be so by those that the researchers interviewed. The strengths of the different personalities involved appeared to be a factor in the importance of relationships to food safety outcomes.

During analysis of the 24 case studies, researchers found that many FBOs spoke of having similar behaviours with relation to compliance and outlined broadly similar attitudes that seemed to underlie these behaviours. This allowed researchers to identify three broad mindsets with relation to regulation. While there were minor differences in attitudes to specifics, all of the FBOs exhibited one (or sometimes more than one) of these dispositions, which helped determine their responses to, and interpretations of, situations involving compliance. These mindsets will be explored in more detail throughout this chapter. But, briefly, the FBOs we encountered could be described as either:

- Resistant: unwilling to improve compliance despite presence of officials;
- Reactive: improving compliance because of the presence of officials; or
- Proactive: aiming towards full compliance on own initiative.

The interpretative mapping of these mindsets was data driven, rather than theory driven, and reflected the dominant thematic strands that were common across the FBOs' descriptions of their attitudes towards, and behaviours with regard to, compliance.

These mindsets are porous and changeable, and FBOs may sometimes sit between two, or move from one to another depending on the approach of the OV, the particular regulations in question or other factors including business performance. The mindset of the FBO tended to be replicated in the staff. For the most part it can be assumed that the staff of a resistant FBO, for example, will also have a resistant mindset.

## 5.1 Resistant

**Resistant FBOs lacked the will to comply with all regulations. They often also lacked the knowledge or resources to do so, but the proximate barrier to improved compliance was their attitude.**

### Profile

FBOs that were resistant tended to be those who ran small- or medium-sized slaughterhouses, usually family-run businesses. They were typically (but not exclusively) older males with decades of experience in the meat trade, with staff who also had many years of experience and whose expertise they trusted. They described themselves as under significant commercial pressure, often noting that they were just barely managing to stay in business.

### Mindset

Resistant FBOs often made **economic arguments** when discussing their attitude towards regulations, officials and the decisions they make. They described the difficulty of staying in business in the face of competition, especially from imported



meat, which was thought to be cheaper and therefore more attractive to many customers. Their views on the different types of inspections were usually in part influenced by the cost of maintaining official presence in the slaughterhouse. Given the commercial pressure they encountered, all costs needed to be justified, and where officials were seen as replicating work that would be carried out in their absence (*ante mortem* checks), then resentment can build. In particular, the salary of the OV was seen as inflated, and the need to pay this meant they felt they did not have the budget to take on extra staff, or to give staff a pay rise.

Though some of these FBOs recognised and appreciated the subsidy, they nevertheless thought that the cost of official presence is something that significantly disadvantages their business, particularly in comparison with imported meat, as many believed that the cost of regulation in other EU countries must be lower, given how competitive the price of imported meat is.

More broadly, those of a resistant mindset were often of the opinion that being fully compliant with all official controls was too costly for small and medium-sized slaughterhouses, especially where significant building or structural improvements were needed to ensure compliance. Structural changes, for example replacing flooring in the lairage to improve animal welfare, can be seen as unaffordable by these FBOs. They compared this with large slaughterhouses where, although costs of compliance may be far higher in absolute terms, these were thought to represent a lower proportion of costs per unit of throughput. Some had the extreme view that the FSA is (in conjunction with supermarkets) trying to drive small slaughterhouses out of business. In particular, it was thought that representatives of larger slaughterhouses have too much influence over any changes to legislation and regulations.

In addition, contractors were usually criticised, as they were seen to be removing money from an industry where there is already a huge amount of pressure on costs and increasing competition from other markets. There was the perception that outsourcing the management of OVs and MHLs simply added further costs. Some resistant FBOs were suspicious that contractors instruct OVs to endeavour to “make work” and to claim more costs e.g. by finding faults with structures so that there are issues to report on in the audit with the result that the period between audits did not increase.

A good reputation among customers was an important reason for a resistant mindset among some FBOs, as it meant that they thought that their current practice was good enough. This type of FBO spoke of how much they value their own reputation among their customers, and production of “safe meat”, in order to safeguard this reputation. As described in Chapter 4.4, this reputation was usually associated with the quality of their meat, and safety or “wholesomeness” was an important component of a quality product. Their reputation was seen as the reason they had been able to stay in business, often through several generations, and was often the key driver of their behaviours. **Pride in their product** was a continual touchstone for FBOs of this type throughout the case study visits. This was sometimes the cause of tension with officials – because FBOs did not think

the officials fully appreciated the importance of business reputation, the effort that had gone into building it or the quality product on which that reputation relied.

Typically, their **long-term experience** of running or working in slaughterhouses appeared to make resistant FBOs distrustful of those who had less experience than themselves. Resistant FBOs were likely to be hostile towards any officials whom they perceived to be inexperienced (i.e. less than several years experience). They felt that lack of experience means that such officials do not understand animals, how to inspect properly (ante and post mortem), or the economic value of meat. FBOs with this mindset cited incidents where an action by an official had, to their minds, proved that they were insufficiently qualified to be carrying out the role. Examples included officials not knowing the sex of an animal, an OV wearing a high visibility jacket in the presence of animals who are easily scared, OVs needing to be taught how to make incisions when providing cover for MHIs, or MHIs needing to be taught how to identify liver fluke in a carcass.

This **emphasis on experience** meant that this type of FBO tended to have better relationships with legacy Local Authority or Meat Hygiene Service meat inspection staff, simply because they had, by definition, long experience of work in slaughterhouses, which inspired trust in their ability. By contrast, newer MHIs (usually those who are employed by contractors) were seen as having lesser expertise and as a result were often not considered credible. Some FBOs thought that the training of these newer MHIs is insufficient, as it was thought to consist of a five-week long course. The training of OVs was also questioned. There was a widespread perception among FBOs and some staff that the veterinary training in other EU countries is not as rigorous or as lengthy as in the UK.<sup>26</sup> In addition, FBOs who work in British slaughterhouses questioned why the specific training to obtain certification to work as an OV is “so short” (thought to be three weeks or a month).

“I am disappointed with the term vet or OV because ‘V’ means veterinarian. A veterinarian goes to college for longer than a medical practitioner, [they go] to college or university for 6 or 7 years. We have a situation where people who are called OVs have been on a month’s course”.

FBO

FBOs of a resistant mindset often came from a rural background and described themselves as having worked with animals for the whole of their lives. As a result, they did not value the animal welfare expertise of the OV, and **did not think that ante mortem inspection adds value**. They often employed trusted lairage staff and pointed out that they do welfare checks on the animals themselves.

---

<sup>26</sup> Veterinary studies are harmonised across Europe and every OV has to be a full member of the Royal College of Veterinary Surgeons (RCVS). However, this was not the perception among FBOs, who generally thought that veterinary degrees from the continent were not of a similar standard to British veterinary degrees.

“I pride myself on my animal welfare”

FBO

Some saw the ante mortem check as an affront to their integrity, noting that they paid close attention to animal welfare in the absence of any officials, both because they see this as the right thing to do, and also because they believed that animals who are treated well make for better-quality meat. For example, one FBO explained that treating the animals well before slaughter allowed the meat to be sold with a longer shelf life.

By contrast, the **post mortem inspection was usually valued** by those with a resistant mindset as it was seen as adding value. The health mark was viewed as a rubber stamp on their meat, a proof of the “quality” and “wholesomeness” of their product.

For some FBOs, however, the **health mark represented a division of labour** between them and the officials. To them, the officials were responsible for ensuring that the food that leaves their plant is safe to eat. They saw their responsibility as presenting a good-quality, clean carcass for inspection. In some plants, officials did report that FBOs with this mindset have a tendency to question decisions to detain or condemn meat, which was viewed as being driven by economic reasons i.e. wanting to preserve the carcass for sale.

Thus negative attitudes towards the FSA, the structure of regulation and lack of respect for the expertise of officials based in the plant are all reasons for the resistant mindset. These are compounded by intense commercial pressure. Some with a resistant mindset have the potential to be reactive depending on the approach and perceived experience of the officials in their plant. However, a small number have such negative views of officials that any change in their attitude may be extremely difficult to effect.

### **Impact on staff views**

A negative attitude towards officials on the part of the FBO was often reflected in the staff. Even where they worked functionally with the officials currently in place, they may view the relationship as “them and us”, and lack respect for the post of the OV.

Sometimes, where FBOs were particularly vociferous in their rejection of officials, this view influenced the attitude of the slaughterhouse staff. In several plants the OV was resented as a symbol of their own staff’s pay having been frozen for several years.

“I think paying them £30,000 a year is a waste of money when you could be employing two or three more men on the line making life easier for everyone”

Employee (supervisor)

## 5.2 Reactive

**Reactive FBOs were willing to comply with regulations as far as is necessary to stay in business and not incur any reputational damage. However, they often lacked the knowledge or resources to do so, which could make improvement in compliance a slow process.**

### Profile

FBOs that had a reactive mindset were found in all types of slaughterhouse. As with those of a resistant mindset, many described themselves as under significant commercial pressure, which meant that they had many responsibilities to juggle. They were sometimes also under pressure from their suppliers, who had the option to take their animals elsewhere if not accepted by the FBO. Usually they had worked in a slaughterhouse environment for most or all of their working lives, and some FBOs appeared to lack the business or management knowledge to deal with the different challenges they faced.

### Mindset

Reactive FBOs sometimes described their role as logistical; they needed to keep on top of sourcing animals, keeping the meat moving through the line and ensuring they can fulfill customer orders. Most reactive FBOs did not, (as proactive FBOs did), spontaneously speak about the food safety or animal welfare demands of their customers, and tended to not have to comply with external compliance standards other than those of the FSA. It seemed that customer pressure sometimes competed with the demands of compliance, as FBOs juggled the need to fulfill numerous small orders and diverse customer requests.

FBOs of this mindset did, on the whole, try to forge good working relationships with officials, at least when officials first began working in their slaughterhouse. However, many described **requests by officials as another thing to add to their 'to do' list**, but took their own views on the priority to assign to these requests on a case-by-case basis, as resources (manpower, money) allowed. While they usually take on board what officials say, change (i.e. raising standards) can be slow due to the various other pressures they faced. A number of these reactive FBOs seemed to do as much as was necessary to keep the officials from escalating any incidents, but no more.

Reactive OV's **usually valued the advice and guidance** of the OV because many would find it difficult to keep up-to-date with regulations on their own, given their other responsibilities.

"We get certain things from them [the FSA], in their speak which is hard to understand. The OV just lays down what is and what isn't"

FBO

They tended to be conscious that many similar slaughterhouses have gone out of business and were willing to do whatever it takes to stay in business, insofar as resources made it possible.

FBOs with this mindset usually **did not think that being fully compliant with all of the regulations was important in and of itself**, as long as they were producing meat that was passed FFHC and health-marked. As a result improving compliance in plants with FBOs of this mindset is usually dependent on the presence of officials who drive change, either through enforcement or education. Reactive FBOs seemed to respond best to compliance requests from officials where there is continuity so that they know what to expect from 'their' OV and MHI. Officials in plants with reactive FBOs pointed out that while standards may be good and their requests are usually complied with, they feel that they sometimes act as a brake on standards slipping.

Despite initially being open to good relationships, those with this mindset **can have fractious relationships with officials** who demand immediate action, especially if the corresponding changes are costly.

They tended to be **frustrated with frequent changes of officials** or officials sharing roles (e.g. having more than one OV at a time, each working in the slaughterhouse on different days), as this usually meant several different sets of requests, depending on what that official ascribed particular importance to. In these cases the slowness of response to official requests and advice could be a means to ensuring that the business was not disadvantaged by having to respond to what they saw as the "whims" of particular OVs.

Those with a reactive mindset were also likely to have **less successful relationships with officials whom they perceived to be inexperienced** although, unlike resistant FBOs, they tended to give such officials an opportunity to establish a good working relationship when they first begin at their slaughterhouse.

Reactive FBOs tended to be less critical of the cost of officials than those who are resistant. Many seemed to be satisfied with the status quo as the price that they pay enabled them to be compliant without investing too much of their own time in proactively improving animal welfare and food safety standards. Given the commercial pressures they described, however, reactive FBOs would probably balk at having to pay any more than they currently do. A large increase in the cost of compliance could cause them to adopt a resistant mindset.

Importantly, due to the similarities in profile between many resistant and reactive FBOs, it could be **easy for those of a reactive mindset to slip into a resistant mindset** as a result of perceived conflict with officials or the FSA. This would be most likely where there is bad communication between the OV and the FBO - due to manner or sometimes language issues - or the OV is perceived to be taking an inflexible approach, and enforcing all regulations in the same way (i.e. not taking a risk-based and proportionate approach). However, it appeared that this process can work in reverse. For example, resistant FBOs can adopt a reactive mindset

especially where they agree with the official about the risks involved – typically this was visible risks such as hair or faeces.

### **Impact on staff**

With this in mind, the staff of reactive FBOs had usually been instructed to ‘do as they’re told’ by officials. However, given how distracted some reactive FBOs seemed to be, the staff often had a lot of power and responsibility on the line. As a result, in the absence of strict instruction or procedures, staff did not always maintain hygiene standards and paperwork as well as officials would like them to.

As outlined above, the mindset of the FBO tended to be replicated in the staff. For the most part it can be assumed that the staff of a reactive FBO will also have a reactive mindset. The exceptions found in the research were a few small and medium-sized slaughterhouses where reactive FBOs spent all of their time on sales and no time at all on the line, where staff either followed their own initiative, or took their lead from officials.

## **5.3 Proactive**

**Proactive FBOs were willing to comply with regulations irrespective of the presence of officials and had the knowledge and usually the resources to do so.**

### **Profile**

In some slaughterhouses, particularly medium and large plants, FBOs could be said to have a proactive mindset towards compliance, and take full ownership of food safety. This mindset was noted most often in FBOs who worked in plants that are owned by larger chains, which hold contracts to supply meat to large retailers. These retailers exert a large amount of pressure on their suppliers to meet quality, animal welfare and food safety standards. FBOs with this mindset tended to come from business or management backgrounds (as opposed to having worked on the slaughter line directly) and were usually not directly involved in slaughter. They worked in slaughterhouses which had the resources to employ people to focus solely on compliance matters.

The proactive mindset was typically the result of external pressure and did not indicate an a priori commitment to food safety and animal welfare but simply that they were seen as one of the necessary pillars of running a commercially successful slaughterhouse. Animal welfare and food safety were seen as a necessary cost of running a business, and one that (usually) could be relatively easily absorbed in some larger plants given the economies of scale involved. In smaller slaughterhouses, however, it seemed that a commitment to the value of official controls (especially food safety) was necessary to develop a proactive mindset, in the absence of the external pressures that large plants had.

## Mindset

Proactive FBOs tended to speak at length about the **performance pressure** that they are under from customers and their concern about how not ensuring very strict food safety management might affect reputation among their customer base and consequently repeat custom. Where large contracts were involved, this pressure was more direct than in other circumstances as any failure to meet standards imposed by retailers could result in the loss of all of their sales with immediate effect. FBOs were therefore motivated to be vigilant about meeting lots of different requirements, including official controls but also other standards that their specific customer had put in place. As a result, they usually saw their own standards, in particular in relation to animal welfare, as above what official controls require, and described official controls as just one among many considerations they need to take into account when making decisions about the running of their slaughterhouses.

Those with proactive mindsets described how they try to build compliance into all aspects of running their slaughterhouse. Usually, this was the responsibility of particular members of staff and, in the largest slaughterhouses there were entire technical teams who focused both on compliance and quality assurance.

The presence of strong management structures in these large slaughterhouses meant that officials had several ways of effecting change. When verbal advice on the line proved insufficient, they could speak to supervisors and managers which was usually a successful means to ensuring that their requests are put into practice.

“I’ve never had a problem nobody would sort out. You either speak to the supervisor or somebody higher up”

MHI

Proactive FBOs usually worked constructively with officials, but some had argued for fewer on site (particularly MHIs) for cost reasons, as much of the FBOs’ time in the largest plants was devoted to streamlining processes as much as possible. Proactive FBOs in red meat plants noted that they would prefer to employ staff directly to carry out post mortem inspection, as is currently the case in white meat plants. They felt this would save money and, in their view, allow them greater flexibility in operating hours, as currently they felt that it is difficult to change officials’ working hours at short notice.

Proactive FBOs in very large slaughterhouses also pointed out that animal welfare is extremely important to the retailers they supply, which meant that they employ specially trained staff in the lairage. As a result they usually did not view the OV ante mortem check as necessary. Some FBOs in plants with high throughputs described this check as cursory, and thought that the OV role should have more of a whole-plant emphasis. Others noted that the OV could add more value to the business by getting involved in animal quality processes, thus helping them to improve animal welfare before the animals enter the slaughterhouse. For example, one FBO in a large white meat plant had a weekly meeting in the

slaughterhouse with lairage staff and the farm veterinarian who served all their supplier and quality managers. In this meeting they discussed any issues that had been observed with the animals that week in order to feed that information back to the farm. The FBO noted that it would be useful for the OV to attend that meeting, but that he could not require her to do so as it is not an official part of her job.

### **Impact on staff**

A proactive FBO mindset usually meant that such FBOs run process and audit-driven slaughterhouses, where there is often little room for influence of subjectivity in staff approaches to their jobs. Tasks related to animal welfare and food safety were set out in job specifications and procedures, and there were clear lines of reporting for all staff. Such FBOs noted the importance of providing training in order to ensure processes followed, and also highlighted the importance of monitoring and recording these processes.

“It [food safety] used to be a problem three or four years ago when no one was checking the CCPs (critical control points) but now there is somebody for each part of the slaughterhouse, monitoring each of the CCPs”

OV

In slaughterhouses with proactive FBOs, staff, particularly supervisors, were aware that officials are on hand to check their work and standards rather than assist or even advise them.

“If he’s [MHI] coming to me with a problem with the carcasses then we’re not doing our job properly”

Employee (supervisor)



## Chapter 6: Officials' approaches

Effective relationships between the FBOs/staff and officials are largely dependent on both on the mindset of the FBO (as described in the previous chapter) and the approach taken by the official, described in this chapter.

### Key findings

- It is possible to group officials' approaches to their roles into three main categories:
  - **Facilitator:** This approach involves working directly with the FBO and staff to improve compliance, often to the point of taking responsibility for food safety and animal welfare outcomes in the plant.
  - **Educator/consultant:** This approach involves advising the business in order to improve compliance, and attempts to build capacity within the business to take ownership of food safety and animal welfare.
  - **Enforcer:** This approach involves using the regulations themselves to try to improve compliance. Officials who were observed to take this approach tended to stick rigidly to their job description and use official language when describing their role.

As was the case with the FBOs mindsets, analysis of the responses of all of the officials (OV and MHI) in all of the 24 slaughterhouses indicated that they described three broad approaches to their job. These were:

- The facilitator: works with the business to improve compliance;
- The educator or consultant: advises the business in order to improve compliance; and
- The enforcer: concentrates on improving compliance through enforcing official controls.

The interpretative mapping of these approaches was data driven, rather than theory driven, and reflected the dominant thematic strands that were common across the participants' descriptions of their work. Moreover, the approaches should not be viewed as mutually exclusive since many officials would often use a mix of these approaches, and they described shifting the emphasis of their approach when interacting with a FBO depending on perceived risk to public health, FBO mindset, historical compliance and how much ownership the FBO currently takes of food safety. In many cases the enforcer approach seemed to be the default.

An official's decision to adopt a certain approach could also be underpinned by their values, and attitudes towards their role. For example, one experienced MHI spoke about having a sense of pride in helping to raise standards in slaughterhouses. This official spoke about 'going the extra mile' which typically involved spending a lot of time advising the FBO on ways in which to mitigate the level of risk while explaining how this might be good for business. In this instance the FBO seemed to be convinced the official was genuinely interested in the commercial success of the business as well as enforcing regulations. As a result, this approach seemed to encourage the FBO to put in place the measures suggested by the official.

All three approaches are described and illustrated in detail below. In the three sections, we first briefly describe the approach and why it was taken in the slaughterhouses that we visited. We then outline how the officials who took such an approach behaved, based on the self-description of officials and the description of their behaviour by others within a slaughterhouse. Finally, we describe the potential positive and negative effects of each of the approaches, drawing on examples from the case studies where these approaches were encountered.

## 6.1 Facilitator

**The facilitator approach involves working directly with the FBO and staff to improve compliance, often to the point of taking responsibility for food safety and animal health and welfare outcomes in the plant.**

This approach tended to be taken by officials in plants where officials described the compliance processes as weak as a result of a reactive FBO who lacked the resources or knowledge to improve standards. As a result the officials adopted this approach as a pragmatic response as it was seen as their only way of improving standards. In other cases, in small slaughterhouses where the OV must also work on the line doing post mortem inspection, the official seemed to have 'fallen into' this approach as a result of their working environment. This approach could only be taken where the FBO and staff were willing to accept help and learn from officials.

"X [OV who takes facilitator approach] is a man of the world, he's sensible, he's seen everything, he knows everything ... it makes a hell of a difference."

Employee

### Officials' behaviour

Typically, facilitators were OVs who bypassed the FBO and took personal responsibility for management of food safety processes in their base plant, entailing multiple checks of hygiene procedures throughout the day, and a high level of interaction with slaughterhouse staff. In several instances, OVs described spending much of their time reminding staff to conduct simple tasks such as changing protective coats between the lairage and production line, wearing

hairnets, using knife sterilisers or closing doors between different areas in the plant. They also described monitoring the speed of production and advising staff to “go more slowly and carefully” when there is extra risk e.g. from contaminated animals. Some FBOs and staff used the language of management when describing the role of such OV’s e.g. “the OV oversees” (FBO), “[OV] makes sure we’re doing our job” (Employee).

Some facilitator OV’s also liaised with suppliers about the quality of the livestock they deliver and made efforts to force them to improve it. Usually this was because of a commitment to animal welfare, although sometimes it was part of an effort to control risk by reducing the number of dirty animals that arrive at the slaughterhouse. Several OV’s described either speaking directly with farmers as they delivered animals, or writing to them for this reason. One had contacted the trading standards association to report farmers. This is despite its legally being the FBO’s responsibility, and in many cases the FBOs having been involved in choosing the livestock that was deemed by the official to be of insufficiently high-quality to slaughter.

In several slaughterhouses staff spoke about how MHIs take time to teach them how to perform their tasks in the safest manner. These facilitator MHIs described training the younger slaughterhouse staff as part of their role. Others were involved in trimming as they felt it was a way for them to increase standards easily (see case study box below for details).

### **Case Study: Trimming**

The FSA operates a no knife policy which means that MHIs should not be involved in trimming.<sup>27</sup> However, we observed it taking place in a number of slaughterhouses.

MHIs described or were observed working directly on carcasses, either through trimming to remove visual contamination or trimming to improve the quality of the carcass, for example by removing pieces of fat. These MHIs felt that trimming small amounts of contamination from the carcass before applying the health mark was part of their role, particularly where they had a large amount of time to carry out their checks, or there were several MHIs working on the line.

Some MHIs considered it ‘pointless’ to call a member of slaughterhouse staff over to perform a task that they could carry out in a few seconds. Others ascribed their behaviour to lack of clarity around the ‘no knife’ policy that is currently in place.

MHIs described being told to trim visual contamination at their base plant because the FBO knew that this happens in many other plants, and saw it as unfair if ‘their’ MHIs refuse. In these cases MHIs reported feeling pressured to undertake trimming although they did not view it as their role. One very experienced MHI noted that it is easy for him to refuse an FBO request, but he worried about his younger colleagues who may not have the necessary confidence.

<sup>27</sup> FSA staff must not carry out any type of carcass correction work, including for quality reasons, as this is the responsibility of the FBO (Manual for Official Controls)

## **Positive outcomes of the facilitator approach**

This approach usually led to good relationships between officials and staff. The small number of OV's who were seen to take this approach were valued by the FBO, although it seemed that the extent of their contribution to food safety outcomes was not always fully appreciated. Staff seemed to be more likely to ensure food safety through their behaviour when they had a good working relationship with an official who kept an eye on their behaviour.

"They [staff] usually do things right ... because I know them so well they would almost be devastated if I pulled them up on something."

OV

In plants where MHIs were seen to have friendly relationships with staff, this was often as a result of them taking the facilitator approach; they were then seen by staff to be useful and valued as "part of the team". Some MHIs noted that their role would be difficult to carry out without a certain amount of camaraderie on the line, and some felt that adopting facilitating behaviour was a means to building this.

MHIs taking a facilitator approach also led to good practice on the line where they achieved buy-in and therefore could provide informal training to staff on the line. In addition, this approach meant that FBOs in question tended not to challenge any decisions that MHIs made about detaining animals; where they were seen to be willing to pitch in, it seemed that FBOs respected that their decisions on carcasses were fair and final (as opposed to some slaughterhouses where FBOs challenged MHIs on every detained carcass or limb).

The facilitator approach could effect positive change in slaughterhouses where the FBO and staff were willing to listen to the advice of the facilitator official and start to put processes in place to improve standards themselves, though this tended to take a long time. It was seen by the officials in question as a successful approach in increasing compliance in low compliance plants where FBOs lacked the resources to improve compliance alone, as the facilitator officials were providing the strong leadership required to instigate changes to low-level compliance behaviour on a daily basis e.g. use of knife-sterilisers and operational cleaning.

## **Negative outcomes**

While this approach meant that relations between officials and staff were warm, this closeness could lead to officials either consistently overlooking minor infractions of regulations, or enforcing those regulations ineffectively.

"Some contamination in the carcasses is inevitable ... but it's easily trimmed off."

OV

OVs who took the facilitator approach described giving repeated verbal advice and sometimes escalating to a warning letter but never any further. A good example of this is an OV who regularly gave managers and staff verbal advice about ineffective cleaning and had sent several official enforcement letters. This OV had not escalated the issue any further despite the fact that the problem was ongoing due to a consistent failure on the part of the FBO to put procedures in place to ensure that the cleaning was carried out correctly.

This approach could also mean that compliance with some specific regulations may never improve while the facilitator official is in place. Conversely, any positive changes wrought by this approach, particularly to staff behaviour, could be transient, and potentially lost when the facilitator official leaves or is temporarily absent, as it was an indicator that positive change was not being driven by the business itself. Interviews with a few FBOs in small and medium-sized slaughterhouses indicated that where an OV taking an enforcer approach replaced a facilitator, this could sometimes lead the FBO to develop a resistant mindset as they viewed the contrasting approach as a sign they are being “governed” rather than regulated.

Where MHIs took the facilitator approach, it sometimes led to them failing to form an effective regulatory team with the OV, as they did not wish to sacrifice hard-won good relations on the line by adopting the approach of the current OV. This seemed to be especially true of MHIs who were coming to the end of their career. This left OVs isolated and without an effective means both to monitor the line and to effect change on it. Even where their work or approach was not directly affected by MHIs acting as facilitators, some OVs still saw their relationships as “too chummy”.

The facilitator approach was time-consuming for officials, and sometimes distracted them from their other duties or, more commonly in the case of OVs, necessitated working extra hours in order to keep on top of everything. By taking on this extra responsibility for ensuring food safety and animal welfare, officials, and especially OVs, were in some cases discouraging FBOs and staff from taking ownership of food safety. Trimming is a useful illustrative case as, when MHIs trimmed, it led FBOs and staff to believe that they were under no obligation to present a well-dressed and trimmed carcass for inspection. In another case, when the OV took personal responsibility for ensuring that operational cleaning has been carried out to the correct standards, this allowed FBOs to think that their lack of monitoring of these procedures was acceptable. The FBO in question described the OV’s job as “doing the live animal check and overseeing everything else”.

## 6.2 Educator/Consultant

**The educator/consultant approach advises the business in order to improve standards, and attempts to build capacity within the business to take ownership of food safety and animal welfare.**

This approach was usually only taken where officials had been in place for at least a year, as this relationship took time to build. As with the facilitator approach, it was only be taken where the FBO and staff were willing to accept help and learn from officials. As a result, it was only be effective where the official in question was perceived as having sufficient slaughterhouse experience to be able to advise, and was perceived to understand the business objectives of the slaughterhouse. The key difference between this and the facilitator approach is that the officials were advising management and staff either as an educator or a consultant, rather than taking direct, 'hands on' responsibility for bringing about changes.

Officials described taking this approach because they thought it was the most effective way of driving increased compliance in a slaughterhouse, in contrast to an enforcement-only approach. For some it was a pragmatic response to the lack of knowledge of regulations and how best to comply with them that they found in certain slaughterhouses in which they worked. Others used this approach to break down the initial hostility that they encountered from those working in a slaughterhouse. Some, regardless of their initial reception in a plant, thought that building good relationships with FBOs and staff allowed them to drip-feed messages successfully about how to improve standards

### **Officials' behaviour:**

Educator officials were those (usually OV) who worked constructively with FBOs in small and medium-sized slaughterhouses, explaining why certain regulations need to be complied with, and working with them to agree realistic solutions and timescales. In the previous chapter the importance of explaining food safety implications of behaviours was outlined. Educators used this approach for all of their work to improve compliance, and sometimes tried to adopt the most effective messages for each particular FBO and staff. One MHI noted that he had found that the best approach was consistently to explain that better compliance is better for business, and point out the commercial benefits of the changes he wanted the FBO to make.

In larger slaughterhouses, consultant OV) acted as a sounding board for proposed new processes, and advised FBOs on interpretation of regulations. In one large slaughterhouse, senior staff were observed consulting the official staff on the implementation of their back-up plans during an unexpected system failure that took place during the visit. Supervisory staff in some larger slaughterhouses talked about building their knowledge of animals and animal pathology through asking questions of consultant OV) who they sometimes saw as a better person to approach on these issues than some of their managers.

Consultant/educator MHIs advised staff on the line, and carried out verification checks on other parts of the process i.e. check temperatures in fridges etc. As with the facilitator MHIs above, educators MHIs used their position at the heart of the process to build knowledge among staff and explain to them the importance of food hygiene procedures. However, in this role they were less likely to take personal ownership if their advice was not taken on board.

## Positive impacts

As with the facilitator approach, acting as an educator or consultant usually helped to ensure that officials had good relationships with slaughterhouse management and staff.

“It feels like we’re all working together, they [officials] will say to me, you know, there is a problem with something and it is sorted.”

Employee

It was also the approach that was most likely to ensure that FBOs have a positive attitude towards the FSA and regulations, as they perceive themselves as getting better “value for money” from official presence.

In smaller plants, where FBOs often described feeling overstretched, this approach on the part of officials took some of the pressure off the FBOs by giving them assistance in keeping up to date with regulation changes and interpretations of regulations. In larger plants, FBOs described giving advice as the main way in which officials (primarily OVs) add value. However, in some of the larger slaughterhouses where they had not only a technical team on site but technical advisers within the parent company, this was not always necessary.

Finally, some slaughterhouse staff described themselves as better trained as a result of coming into contact with MHIs who took the educator approach.

## Negative impacts

As with the facilitator approach, although to a lesser extent, this approach was time-consuming for officials, and could distract from other duties.

“It’s very tiring. They (business) get a lot out of me. I get very involved.”

MHI

There was also a danger that this approach, by giving officials a larger role in driving behaviours in the slaughterhouse, sometimes discouraged the FBOs in question from taking a fully proactive approach to compliance, and encouraged them to stay in a reactive mindset.

FBOs in larger plants described being frustrated when their OV could not advise effectively on specific issues; given that advice ‘on tap’ is the primary value the OV was seen to add. One FBO noted that he did not understand why it was necessary to go to external advisers to help interpret regulations when there is a representative of the FSA permanently present on site who should be able to give a definitive answer to any questions regarding official controls.

This approach was also highly dependent on the official giving the correct advice, and as such being well-trained, confident and accurate interpreters of the regulations. One FBO described how incorrect advice from his OV had resulted in

him no longer trusting her. It is therefore a difficult approach for a new or inexperienced official to adopt as they may lack the experience and confidence it requires.

### 6.3 Enforcer

**The enforcer approach means using the regulations themselves to try to improve compliance. Officials who take this approach tended to stick rigidly to their job description and use official language when describing their role.**

This approach was taken by officials for a number of reasons. The first was simply due to a strong commitment to the principle that as the FBO is solely responsible for compliance, he or she should take full ownership of compliance matters. Often working in this way was described as the only way of preserving the necessary impartiality for carrying out the role of OV/MHI successfully and allowing for the correct escalation when there is persistent non-compliance.

Some less experienced OVs, though they did not explicitly state this, seemed wary of departing from the rule book in any way, and saw their ability to take enforcement action as imparting authority (rather than their expertise or experience). Similarly, locum or irregular OVs usually took this approach, as they did not spend enough time in the plant to build up strong relationships, or have the kind of understanding of staff or FBO behaviours that would give them confidence to enforce in a less than 'by the book' manner.

Finally, in some slaughterhouses, hostility towards officials - either due to the resistant mindsets of staff or the FBO, or conflict over previous enforcement action – led to officials taking this approach out of necessity, as any other approach would likely have been unsuccessful in ensuring that the slaughterhouse was compliant.

#### **Officials' behaviour**

In small- or medium-sized slaughterhouses, enforcer OVs performed ante mortem inspections, did paperwork and minimal verification checks on other parts of the process. This often meant that the OV spent almost all of their time in the lairage or their office. In larger slaughterhouses, enforcer OVs were those who saw their presence solely as a means of ensuring that official controls were followed to the letter, regardless of the level of risk involved.

In large plants, due to the proactive mindset of many FBOs, enforcer officials' actual work did not differ significantly from OVs in similar plants who took a consultant/educator approach. In these plants, the level of throughput or staggered delivery by suppliers meant that it was impossible for OVs to carry out much work beyond ante mortem inspection and paperwork, as these took up all of their working hours.

Enforcer MHIs performed post mortem checks and rarely did other tasks or checks in other parts of the slaughterhouse.



Taking an enforcer approach did not necessarily mean enforcing all regulation, and it sometimes indicated an official who took a more relaxed approach to their role, only enforcing where they could be sure of success or where they judged it to be necessary to avoid immediate risks to animal welfare or food safety.

Some officials who had negative opinions about some official controls (see Chapter 8) spoke of themselves as reluctant enforcers, for example where they had been forced to condemn animals which were killed without an ante mortem inspection for animal welfare reasons:

“He [FBO] was punished for doing the right thing ... but I had a legal requirement not to allow slaughter.”

OV

For other officials, taking an enforcer approach was seen as the last resort. Those who usually took the educator approach described their disappointment at having to take enforcement action on matters there they had invested a lot of time and effort in advising on how to improve.

### **Positive impacts**

The most important impact of this approach was that the focus of the officials' work was always on regulations. It was less dependent on good relationships than other approaches, as officials were not dependent on the approval of the FBO or staff in order to carry out their work effectively.

This approach underlined to FBOs that compliance is *their* responsibility, not that of the FSA or officials. In a small number of cases this helped to build a sense of responsibility among FBOs and staff in the plant, and arguably meant that in the long term they would be able to address risks in the environment in a proactive manner.

“We’re always trying to find a way to make it correct, which will also make the [OV] happy, [OV] takes it very seriously.”

Employee

In plants where the FBO was already of a proactive mindset, this approach usually resulted in good relationships, as the division of responsibility was already well understood by the FBO, although they sometimes remained of the opinion that the OV could add more value.

However, this approach was only successful where the official in question was seen to be proportionate in decision-making. Proportionality was linked to views of risk, and where the FBO and officials held different views of food safety (see Chapter 4), there was the potential for conflict. When such conflict occurred, it meant that change could only come about through enforcement action, which can take time to escalate, and therefore the effectiveness of the officials to drive change was hampered.

## Negative impacts

This approach sometimes indicated a focus on the letter of the law to the exclusion of other considerations. This led to particular difficulties in plants where FBOs and staff lacked resources to be fully compliant as requests for changes to the condition of the buildings were often perceived to be too expensive. The law-enforcer approach led staff and management at such slaughterhouses to believe that they were being “governed” by the officials rather than regulated by them.

FBOs said that they were frustrated by different officials taking an enforcer approach and then interpreting regulations differently or focusing on different regulations to verify or enforce (as discussed further in Chapter 8). Related to this, where the approach of these officials was seen to not be proportionate, this also caused frustration among FBOs and staff.

This is the approach that was most likely to lead to tense relationships between officials and FBO/staff both for the reasons cited above, and also because it made those who work in the slaughterhouse feel that officials are consistently trying to “catch them out” for small mistakes which were thought to be “natural” and easily rectified. An approach of this kind was perceived to be unconstructive, given that the slaughterhouse staff have to work with these officials on a daily basis. Many related stories of officials seemingly gleefully pointing out their small mistakes and immediately taking written action rather than advising them on how to avoid them.

“[OV] wrote us up when I hadn’t properly scrubbed out the steriliser  
... it was harder after that.”

Employee

This was particularly an issue with visual contamination on the carcass. Those who work on the line were of the opinion that visual contamination of the carcass is not indicative of those on the line having neglected their duties, as “you’re bound to get some contamination sometimes”. Hence they thought that OVs and MHIs should be neutral when pointing out this issue. On the other hand, MHIs noted that staff can sometimes send carcasses with major contamination for inspection, and in these cases it is important for the official to point this out and ask them to improve.

Where officials who took this approach were inexperienced or lacked good communication skills, then these problems were magnified as their enforcement decisions were usually not respected by the FBO or staff. Relationships sometimes then broke down irretrievably as there was no respect for the official or their decisions.

“It’s no good asking a youngster who is wet behind the ears and  
not been working in abattoirs to do this job.”

Employee

Finally, in small plants, officials who took this approach were resented by FBOs, who thought that this perceived low level of activity meant that the OV did not do enough work to justify a full-time salary. In several plants, resistant FBOs described OVs as spending most of the day in an office, interspersed with brief ante mortem checks. They contrasted this unfavourably with their “hard-working” staff, who were on much lower wages.

## 6.4 Whole-plant vs. Inspection-based approach

In addition to overall approaches to the job, it was also observed throughout our visits that officials took differing approaches on where they placed most emphasis of their role.

### OV

Some OVs placed most of the emphasis on ante mortem inspection and animal welfare more generally. For these OVs, this was the most important part of their job, and one that they felt would be most likely to be overlooked if they were removed from the plant. Sometimes the size of the plant and the number of animals needing ante mortem inspection necessitated this approach. They felt that this meant that the OV was usually physically absent from the slaughter line and, therefore, may have a limited understanding of what is happening there throughout the day. As noted above, this approach was sometimes resented by FBOs, as OVs have power to enforce throughout the plant, but were sometimes perceived to know little about production. However, some staff and MHIs preferred this approach, as they thought that it allowed them to “get on with the job”.

Other OVs took a much more ‘whole-plant’ approach. This translated into them being physically present on the production line for at least a portion of every day. Those who took the facilitator and educator approaches were more likely to describe doing this. Some OVs pointed out that maintaining a physical presence across the whole site is an effective means of keeping staff “on their toes”. Staff acknowledged this; one recalled a previous official who had spent most of his time in the lairage and how he believed that limited the OV’s effectiveness:

“We could have been killing ostriches down there for all he knew.”

Employee

This approach was also sometimes helpful for MHIs as it allowed them to feel like they were supported on the line (see Chapter 6.5 overleaf). On the other hand, it led to some staff feeling that they are being constantly ‘nagged’ by OVs who spend a large amount of time in the production area, which led to hostility towards the OV.

It was observed that a ‘whole-plant’ approach is only possible where the OV is willing to dedicate extra time in what is, for most, already a very long working day. One OV spoke of voluntarily relieving MHIs for an hour a day and doing paperwork later as she thought that spending this amount of time on the line was

crucial to her understanding of compliance in the plant. This would be practically impossible for OV's in large plants.

## MHI

In general, MHIs place tend to place most of their emphasis on post mortem inspection. This was often described as the most important aspect of the MHI role, and sometimes as the extent of the role.

Taking an inspection-based approach was sometimes dictated by line speed, as many MHIs needed to be on the line doing post mortem checks for all of their working hours in order to carry out their inspections thoroughly, and to ensure that carcasses did not 'bunch'<sup>28</sup>.

Some MHIs who had time to carry out other checks around the slaughterhouse – due to lower line speeds or a larger number of MHIs on the line - still took an inspection-based approach. They usually felt that it was not their role to take a whole-plant approach, and that this was more rightly the role of the OV.

While some MHIs did take a whole-plant approach, working as a team with the vet, carrying out checks such as chiller temperatures and on hygiene, reasons for this behaviour varied. One spoke of the need for an MHI to take on this role where the OV is not permanently present. Another was concerned with personal reputation; he did not want to be associated with a plant with a weak compliance record as he felt it would reflect badly on him.

## 6.5 Relationships between officials

In this section we briefly look at the key factors which underpin relationships between officials and to what extent this impacts on food safety behaviours in slaughterhouses. Where officials appeared to have good relationships this was due to one of three main reasons: a sense of mutual respect, effective partnership working and the officials' approaches (as discussed in Chapters 4 and 5).

**Respect between officials** was crucial for forging effective working relationships between them. The evidence suggests mutual respect can often be difficult to establish because many MHIs who had been in post for a long time resented the presence of OV's based on a belief that their presence has diminished the MHI role and relegated them to simply performing post mortems. Unless OV's were considered credible (i.e. were seen to have the skills, knowledge and ability to deliver official controls effectively) as well as having a good understanding of the slaughterhouse environment, this resentment could often lead to MHIs questioning the suitability of certain OV's to work in slaughterhouses.

Officials who viewed themselves and each other in a **partnership**, working alongside one another in order to achieve a common goal (e.g. raising standards), tended to have stronger relationships. Frequent and ongoing dialogue between

<sup>28</sup> This is where carcasses come into physical contact with each other due to limited space, usually when the line is backed up at some point. This can cause cross-contamination.

officials was often a precursor to an effective partnership. For example, in one plant the OV and MHI consulted with each other on a suspected case of TB, and the OV ultimately took the decision to sample the carcass and send it for analysis. Recognition of the OV's technical expertise allowed the officials to work together as a functional regulatory team.

Some thought it was possible for the MHIs to have a large amount of influence over inexperienced OVs. In one plant the FBO was of the opinion that the MHIs regularly instructed the OV on what actions to take. He found this frustrating as he felt that the MHIs were instructing the OV to take what he saw to be a disproportionate approach to some regulations: for example issuing a warning for SRM dye not being sufficiently blue.

By contrast, some MHIs also spoke about feeling frustrated that they had limited opportunities to assist OVs in the delivery of official controls; in particular in relation to issues relevant to production areas. As a result, there was a perception among some MHIs of being underused or undervalued which appeared to cause a tension that undermined the ability to develop a good working relationship. While some OVs did report working closely with MHIs, more commonly they seemed to view their role as simply carrying out the post mortem, and did not speak about using their expertise to aid them in other aspects of their regulatory work.

While the absence of partnership working between OVs and MHIs did not appear to have had a significant effect upon the verification of standards (since the different players delivered official controls responsibilities regardless), it possibly meant lost opportunities to aid each other in other aspects of their regulatory work for example sharing of intelligence of certain practices or innovative ways in which to control certain hazards.

**OVs' approach** to their regulatory duties also influenced the nature of the relationship between officials. OVs who were perceived to be interested in developing an understanding of the whole plant as opposed to focusing on ante mortem inspection and paperwork appeared to be viewed more favourably by MHIs. Where OVs were perceived by MHIs as being able to set clear expectations for FBOs and slaughterhouse staff and being able to back them up by reference to regulation, this also helped develop closer working ties between officials. As a result, MHIs tended to rely on the OV as a 'go to' person for technical advice which convinced some MHIs to view part of their role as acting as an extra set of eyes on the line so that they could provide OVs with regular updates on food safety behaviour.

### **Effect of officials' relationships**

MHIs spoke of the difficulty of maintaining their independence and impartiality while working with plant staff and a few explicitly noted that they use the OV as back-up or to deliver difficult messages in order to maintain friendly relations with staff, as they thought that they were more effective when relations on the line were good. Where MHIs did not have good relationship with the OV, they

sometimes lacked back up and were either forced into a facilitator approach for fear of jeopardising their relationships with staff or had to deliver difficult messages in person which sometimes lead to hostility towards them on the part of staff.

Effective relationships between officials are also important for encouraging good food safety outcomes. When officials are perceived by FBO and slaughterhouse staff as a single regulatory unit with a single regulatory message it can offer the consistency necessary to drive some FBOs and slaughterhouse staff to improve standards. This is particularly true if both sets of officials take an educator approach, or an enforcer approach that is perceived to be proportionate by the FBO and staff.

## Chapter 7: Relationships between officials, FBOs and staff

As outlined in Chapter 3, the relationships between officials and FBOs and slaughterhouse staff can be one of several drivers of, or barriers to, FBOs taking ownership of food safety. This chapter describes how FBO mindsets and official approaches can interact and how this affects these relationships. First, however, it describes the other factors that can affect relationships.

### Key findings

- Depending on the mindset of the FBO and the approach of the official, perceptions of roles and responsibilities within the slaughterhouse can shift.
- Where the officials are taking a facilitator approach, the permanent presence of officials can potentially undermine legislative intent by acting as a barrier to FBOs taking ownership of food safety.
- Some resistant FBOs think that the officials *should* be taking ownership for ensuring food safety, given that they must be present at all times and the FBO is required to pay for at least part of the cost of their presence.
- On the other hand, when OV's take an educator approach, clear communication by respected officials as to the responsibilities of the FBO and the reasoning behind those responsibilities can drive more positive attitudes towards compliance and spur FBOs to take ownership of food safety.
- Perception of officials as consistent and proportionate in their interpretations of regulations and enforcement approach can also drive more positive attitudes towards compliance and increased ownership of food safety.
- By contrast officials who are seen as "hardline" or "nitpicking" enforcers can act as a barrier as their approach is seen as disproportionate by FBOs, particularly those FBOs who lack understanding of how some regulations relate to food safety.

### 7.1 Other factors that influence relationships

While there were a number of other issues that were described as affecting relationships between officials and FBOs and staff, many of these could be traced back to mindsets and approaches. For example, throughout the research, **cultural and language issues** were often pointed to by all key respondents as being a barrier to effective relationships. FBOs and staff described officials who they thought did not speak sufficient English or communicate in a manner that they

thought was appropriate to the situation, and sometimes thought it relevant to 'warn' researchers prior to interviews with officials that communication with them might be difficult.

"Don't let him pull the foreign trick on you."

Employee

However, on probing, these same interviewees were usually able to recall other officials from overseas with whom they had interacted well. Usually, the cause of the conflict or difficult relationship could actually be traced back to the approach of the official, so that when FBOs and staff complained about officials being from a different culture, what they appeared to mean was that they did not like the officials' approach to regulation (which can in part be dictated by cultural background and experience).

OVs also described finding it difficult to adjust to the culture within a slaughterhouse - with some OVs noting that it can be necessary to adapt to an environment in which the use of language is less professional than might be found in other workplaces, particularly the use of sexualised language. This seemed to be particularly the case in small and medium-sized family-run businesses where the staff were predominantly male and had been in place for a number of years, usually plants where the FBO was either resistant or reactive. In these slaughterhouses, researchers observed a macho and sometimes sexist environment.

Another key component facilitating effective relationships was **previous experience of interacting with officials**; where FBOs and staff had had antagonistic relationships with past officials, it is likely that they would, at first at least, be hostile to any new officials i.e. be of a resistant mindset. Similarly good relationships with past officials often meant that staff and FBOs criticised current officials' approaches. For example, in one large plant, FBOs and staff both noted that they preferred the approach of the previous OV, who had spent a large amount of time on the line and advising PIAs, supervisors and quality staff. While the relationship with the current OV was functional, this previous experience led to criticism of the OV as being too formal and sometimes heavy-handed.

A final factor was **longevity of officials**. As noted, where consistency has been a problem, this is likely to affect mindset, and sometimes meant that an FBO was likely, at least initially, to have a reactive or resistant mindset, as they were frustrated with having to adjust to new officials and their approaches on a regular basis. Particular posts being seen as inherently temporary also affected officials' approaches; even where they did plan on staying it was difficult for officials to persuade staff and FBOs to take them seriously as a long-term presence where it was thought (based on experience of previous officials) that they would leave within a few months.

Officials who had been in place for a long time (at least three years) were generally, as might be expected, observed to have a good relationship (developed over time) with the staff and FBO of their base plant although this was not always



the case. While other factors such as individual attributes also affected the nature of the relationship, it seems that longevity was important in these cases as it helped to facilitate a trusted relationship which helped tackle the 'us and them' views that can otherwise exist. Exceptions to this longevity effect seemed to be where the FBO had a strongly resistant mindset.

A driver of relationships mentioned by several officials was the longevity of the FBO. A change of management was often noted as the main reason for large improvements in standards.

"It's hard to believe. There are now different people at the helm and it's made a massive difference. They aren't old-school any more, they have a different outlook, they are young, easy to get on with and approachable."

MHI

Again this relates to mindsets as long experience of the meat trade (especially if believe slaughterhouse staff already do all they can to ensure that meat is FFHC) was one of the key characteristics of those with a resistant mindset.

## 7.2 How mindsets and approaches interact

The descriptions that follow in this section attempt to map the potential effects of the different approaches taken by officials when they work with FBOs with each of the three mindsets. These descriptions are based either on researchers' observations in the case-study slaughterhouses or the descriptions of relationships by key respondents.

### Resistant FBOs

Where the FBO has a resistant mindset, it was difficult for officials to take anything but an **enforcer approach**, as the other approaches were dependent on slaughterhouse staff being open to working with or learning from officials. The relationships between enforcer officials and resistant FBOs were not always bad, necessarily. They tended to be functional as long as the official in question was seen by the FBO to be taking a proportionate approach. However, in slaughterhouses where this dynamic was observed, there seemed to be a limit to how much standards can be improved. Some OVs had resigned themselves to that, settling for an uneasy balance of mild tension, and only escalating enforcement where there was immediate risk, in the knowledge that escalation for other issues would lead to conflict. The OV in these situations described feeling isolated. MHIs had the potential to be a crucial ally in these type of plants: where their relationship with staff on the line was good, they could sometimes become a conduit for food safety messages from the OV where the FBO consistently failed to act on the OV's requests.

In some plants, officials taking an **educator approach** with resistant FBOs was seen to have positive effects on relationships. For example, an FBO who had previously had a particularly poor relationship with an OV who was described as a

particularly zealous enforcer of all regulations, talked about how much better the relationship was with the current OV. This FBO noted that when raising a query, the OV would ask the FBO's opinion before discussing the most sensible approach to take. Staff on the line in this plant also commented on the respectful manner of the OV, which was contrasted with the perceived "bossy" and disrespectful approach of other officials. The OV in turn described making efforts to ensure that staff understood the reasoning behind requests in order to ensure that they follow those requests willingly. In this case, an FBO with a very hostile attitude towards regulation and the FSA had a very good functional relationship with an OV, which seemed to be primarily the result of the OV's approach.

## Reactive FBOs

Where the FBO had a reactive mindset, the **educator approach** appeared most likely to lead to steady improvement in compliance. FBOs who had educator officials in their plant referred to them as "part of the team" and responded positively to their requests. An OV in one such plant said that she felt that the FBO and staff had a proactive and positive attitude to compliance and at most needed a few verbal reminders to get things done. In another plant where this dynamic was observed, the official took a conscious strategy of communicating a "compliance is good for business" message with management which he thought them made it easier for him to gradually deliver messages in relation to food risks and sustain a "we're all in it together" ethos. The plant in question had managed to improve their compliance scores significantly in a short space of time.

Where the reactive FBO had good intentions to improve standards but lacked the resources (expertise and/or supervisors) to put good supervision and monitoring procedures in place, officials sometimes took a **facilitator approach** in order to compensate for this. Usually it led to outwardly good working relationships between officials and FBO and staff. According to officials who had pursued this approach, in the short term, it also led to immediate improvements in food safety outcomes, as slaughterhouse staff were more likely to follow food safety procedures, especially those that were not linked to visual contamination (e.g. sterilising knives). However, constant policing by officials was required in order to maintain improved behaviour of staff, and the FBOs in such plants did not 'take ownership' of food safety, as the officials were seen to be doing this role for them. In addition, taking this approach was a huge burden on the officials involved; it required investment of a large amount of extra time and energy and, in some cases, adaptation to the prevailing culture among staff on the line. For example, one OV described having to decide not to be offended by the 'banter' of the male employees in her base plant despite finding it immature and inappropriate.

Finally, where officials took an **enforcer approach** in plants with reactive FBOs, the success of relationship seemed to be dependent on how they were perceived by the FBO and staff. In the examples observed, if the officials were seen to be knowledgeable and experienced, then relationships tended to be functional. One OV described how this respect for their authority had been built up over several years in the slaughterhouse as they drew upon her experience; now everybody in

the slaughterhouse takes this OV's advice on board immediately and without question, which was corroborated by other interviewees.

By contrast, where FBOs with a reactive mindset had less positive relationships with officials in their plants it seemed to be due to their lack of respect for that specific official's expertise, as many described good relationships with officials whose expertise they respected. One described his reasons for not taking on board the advice of the newly qualified OV stationed in his slaughterhouse as follows:

"[OV] is a smashing [person] but has had 3 weeks training and being told what to do in my business is an affront on my integrity. I've been doing this since I was 13. I go to a farm select the best animals for slaughtering. How can [this OV] tell me how things should be done?"

FBO

By contrast, this FBO had a functional relationship with the lead veterinarian in the area who covered for the permanent OV some days, both because the LV was seen to have more experience and thus commanded more respect, but also because this vet consciously took an educator approach:

"I feel more at ease with the LV because they talk to me rather than at me. Ask me to do something and I'll do it but don't tell me."

FBO

### Proactive FBOs

In general, taking an **enforcer approach** with proactive FBOs led to functional relationships. Many officials across plants with these types of FBOs commented on the professionalism of the workplace and the ease with which their requests were fulfilled, in comparison to other plants. Relationships between officials and FBOs in the larger plants tended to be formal and officials described not needing to make great efforts to establish good personal relationships with staff, as they could be sure that their requests would be complied with due to the procedures and internal monitoring in place.

OVs in large plants with proactive FBOs tended to work entirely through management, and in some cases staff on the line had no idea who the OV was and what their role entailed. This, while not effecting food safety outcomes, was thought to be a pity by some slaughterhouse staff and management as it was seen as depriving the staff of the chance to learn from the OV.

In several plants FBOs and staff mentioned previous OVs whom they had seen as **educators/consultants** and who had built up working relationships with staff at all different levels. As outlined above, some proactive FBOs felt this educator/consultant approach added more value and helped the business: "If

we're not getting it right, we need to know how to get it right"; while others felt there was no need for officials to move beyond the enforcement role.

However, as with those who have a reactive approach, where proactive FBOs lacked respect for officials, relationships tended to deteriorate. It seemed important that officials in large plants are authoritative and confident in their role, as management in these plants can be forceful.



Slaughterhouse social science research project: Section D

# **VIEWS OF REGULATION AND FUTURE REGULATION**

## Chapter 8: Views on the current regulatory regime

The purpose of this chapter is to describe the respondents' views on how slaughterhouses are regulated. It discusses overall views of the current regime and then examines perceptions of the current regime's impact upon animal welfare and food safety compliance.

### Key findings

- Research participants generally thought that the current regulatory regime is effective in ensuring that meat is fit for human consumption (FFHC) (although some caveat that this is only true insofar as this can be determined through sensorial inspection), and that animals are treated humanely.
- Most officials were aware of the significance of microbiological risks (e.g. E-coli, salmonella), and OV's spontaneously reported the limitations of post mortem inspection.
- Many FBOs and a few officials put forward criticisms of the current regime, including:
  - The current regime was perceived to be expensive to deliver.
  - The current 'one-size-fits-all' regulatory model was thought to be unfair and disproportionate
  - Some official controls are not seen to be risk-based, which leads some to think that some inspection tasks are misdirected.
  - Lack of consistency among officials leads some FBOs to be uncertain about what improvements are needed
- Ante mortem inspection was viewed by many as replication of tasks already carried out by slaughterhouse staff, and most FBOs advocated its abolition or transfer to their own staff.
- Research respondents appeared firmly to believe that sensorial inspection (i.e. visual inspection, palpation and incision) is the only workable way of checking that meat is FFHC, and supported the retention of independent inspectors, although a few FBOs in red meat plants were of the opinion that their staff could perform this task.

## 8.1 Concerns about the current regime

Participants spontaneously put forward wide-ranging concerns about the current regime. The issues discussed below are broadly presented in order of the strength of feeling of reported views, and these include:

- The current regime was perceived to be expensive to deliver.
- The current 'one-size-fits-all' regulatory model was thought to be unfair and disproportionate
- Some official controls are not seen to be risk-based, which leads some to think that some inspection tasks are misdirected.
- Lack of consistency among officials leads some FBOs to be uncertain about what improvements are needed.

### Perception that current regulatory regime is expensive

Although there was widespread support among participants for an independent organisation to deliver official controls in slaughterhouses, many participants were concerned about the cost of compliance, and felt that the regime itself is unnecessarily expensive because of the perceived bureaucracy.

FBOs felt the amount of paperwork demanded by the competent authority was excessive and time-consuming – a view supported by some officials (in particular OVs). While they acknowledged that some documented checks were important (e.g. Food Chain Information), some officials suggested that streamlining would be welcomed since they felt that this would free up time to allow them to focus on other areas (see chapter 9 for improvement to delivery of official controls).

FBOs also believed the organisations responsible for delivery of official controls (central competent authority and contractors) to be top-heavy and inefficient. This concern was particularly evident among FBOs in small and medium plants who felt there had been a build-up of unnecessary layers of management within the competent authority over the last fifteen to twenty years.

In terms of the FSA charging model, a number of points were raised. First and foremost, subsidies were broadly welcomed; particularly among FBOs working in small and medium-sized plants who suggested the removal of subsidies would be likely to result in them having to close. Second, many FBOs complained about the hourly rates of OVs, whereas there was more acceptance of MHIs who many perceived to be adding more value than the OVs (because it is MHIs who apply the health mark). Finally, there appeared to be a perception among a few FBOs that the approach to the collection of time-based charges is inconsistent, which led some to believe they are commercially disadvantaged as a result.



## **A belief that one-size fits all system is disproportionate**

In general FBOs were concerned the current 'one-size-fits-all' system is unfair and disproportionate. FBOs in plants who believed they had achieved and sustained compliance said that being regulated in a similar way to weaker plants was unnecessary.

While officials in plants weaker plants often acknowledged standards had broadly stayed in line with statutory requirements over time, they suggested this was largely due to scrutiny and ongoing support from the officials on site. Consequently, officials reasoned that major contraventions could become more commonplace without independent oversight of the slaughtering process.

A few believed the amount they paid for regulatory oversight was helping to subsidise plants unable to sustain compliance (where it was perceived more intervention by officials was necessary).

“Big plants are ok and the little ones like me are fine but the middle ones ... that's where the problems are and we all have to bite the bullet.”

FBO

There was a tendency among some FBOs whose plants did not achieve a 'good' audit rating to think their plants were also suited to lighter-touch inspection. Seemingly, this view was caused by a limited understanding of food safety (View 3 as outlined in Chapter 4) which appeared to result in reliance on using 'tried and tested' procedures; placing (misplaced) confidence in the robustness of existing hazard controls. However, during the visits there was evidence to suggest the audit rating did not always fully reflect the animal welfare and food safety behaviours 'on the ground' (see below for suggestions on alternative measures for determining the level of risk in slaughterhouses).

There was also a frustration among some FBOs in small and medium-sized plants that the improvements in food safety standards they had made in the last fifteen to twenty years had yet to be recognised by the official. They put forward the 'one-size-fits-all' model as evidence that their improvements are not being recognised.

However, some officials cautioned a move away from a 'one-size-fits-all' regime as it was felt that this would necessarily involve increasing the amount of legislation to take account of a range of different slaughterhouses.

“Problem is I assume it's difficult to have different forms of legislation for different plants.”

MHI

As discussed below, many believed that the current system is more difficult to enforce than the previous one (largely because of the perception that current legislation is interpreted differently by different officials and FBOs). They were



concerned that any increase in the amount of legislation would make it more difficult to pull slaughterhouses into line via the use of enforcement.

There was also a concern raised by FBOs in a range of different sized plants that the system or more specifically officials' operational (i.e. working) hours are too inflexible to allow last minute change to slaughtering schedules and, therefore, insufficiently responsive to business needs. As a result, many FBOs felt frustrated that slaughtering hours were restricted. This issue was less prevalent in Northern Ireland where officials described FBOs as customers to whom they must provide a flexible inspection service. For example, in one slaughterhouse the MHI explained it was common to begin inspection by 4:00 am.

### **Views on whether the system is risk-based**

Few FBOs understood the term risk-based and proportionate as outlined in the regulations. However, from the way they talked about regulations, it was clear that there was a widely-held belief that the regulatory regime was not risk-based and moreover that raw meat itself was relatively low risk in contrast to other foods.

Indeed, some FBOs gave the example of shellfish and explained this industry does not have the same level of regulatory scrutiny. While there was an acceptance that the delivery of official controls in slaughterhouses is convenient in terms of the position along the 'farm to fork' pathway, many would like to see more action along the other parts of the pathway although it seemed that those who reported this view largely did so not out of any real concern in relation to public protection but rather due to a concern that that slaughterhouses are unfairly singled out.

### **The relationship between HACCP plans and food safety management**

All slaughterhouses must have a HACCP plan and this forms a key part of the audit process. FBOs took different approaches to producing their HACCP plan, and this will influence how the plan is used in practice.

In general, participants felt that the purpose of HACCP to ensure food safety management is sound. However, officials sometimes thought that these documented procedures were not reflected in the food safety behaviours of slaughterhouse staff. As a result, a few OV's felt too much emphasis is given to audited HACCP plans for making decisions about the frequency of regulatory interventions.

Not all FBOs appeared to take ownership of their HACCP plans. In small and medium-sized plants this tended to be due to them sometimes being developed by employed food safety consultants in order to satisfy the regulatory requirement and thereafter not being routinely checked by slaughterhouse staff. In larger plants dedicated technical teams sometimes took sole responsibility for ensuring that HACCP is fit for purpose and, as a result, it appeared that knowledge of hazards and controls was corralled. OV's suggested both scenarios are common in slaughterhouses and thus were concerned that knowledge surrounding hazard control is not disseminated widely enough.

By contrast, it appears in some plants, officials felt there were robust food safety procedures in place but they had been awarded a poor audit score due to these processes not being believed to be adequately documented.

Requests made by officials to improve the structural environment were often viewed as expensive and unnecessary and not as risk-based or proportionate. FBOs found the emphasis on structural improvement of the slaughterhouse environment to be frustrating for one of three reasons. One perspective of FBOs and slaughterhouse staff was that the risk of contamination caused by the possible build-up of pathogens due to the poor upkeep of the buildings of a slaughterhouse is low in comparison to the risk from cross-contamination and, therefore, not as important. Other FBOs lacked the food safety knowledge (see Chapter 4) and did not understand the development of pathogens and therefore believed the regulatory focus was mis-directed because they did not see how perceived minor defects to the condition of the buildings could lead to risks to food safety. Another view was that plants had already made significant investments to improve the condition of the buildings to renew licences or gain approval status and, therefore, they questioned why more improvements would be necessary.

There was also a somewhat limited awareness among experienced officials of the term "risk-based and proportionate". They struggled to provide an explanation of the relevant FSA strategic objectives,<sup>29</sup> although some believed it might be related

<sup>29</sup> Two of the FSA's six outcomes are:

to conducting a risk-assessment. Beyond this many appeared initially unsure how it could be applied to their daily task. However, as discussion moved onto their regulatory approach, it appeared many were subconsciously thinking in terms of risk-based as they often described a graduated pathway to enforcement; starting informally with the use of verbal advice and/or warnings depending on the perceived level of risk.

“I identify the level of risk. If its high risk like contamination then immediate intervene but if its low risk such as a crack on the floor then I give them time. The level of contamination in this plant isn’t too bad. We’ve pulled them up a few times and instructed them to take more care when trimming.”

OV

### **Lack of consistency between officials**

Lack of consistency between officials (observed in sites across the UK) was mentioned by participants as being a key weakness of the current regime. This was particularly apparent when FBOs were subject to different views of OVs due to the latter rotating between plants.

The lack of consistency in the decision-making of different OVs was seen as a particular frustration as this led many to talk about being unsure what action was necessary in order to comply with legislation.

“Some [officials] are in for an easy life but others follow the rulebook very closely.”

FBO

To overcome this problem, some officials stressed the importance of completing the daily log and enforcement book to help enable alternating officials to get ‘up to speed’ with any flagged contraventions as well as understand any agreed corrective action. It was felt that sharing of information is one way of overcoming the inconsistency of officials and any associated issues. They felt that for a range of reasons the current regime does not achieve this.

“It’s a fair relationship [between OV and MHI]. As a work colleague they are very inconsistent and I find that hard to work with as their admin is especially poor.”

MHI

- 
- Regulation is effective, risk-based and proportionate, is clear about the responsibilities of food business operators, and protects consumers and their interests from fraud and other risks
  - Enforcement is effective, consistent, risk-based and proportionate and is focused on improving public health.

Some went as far as to suggest this open sharing of information might help encourage FBOs to take remedial action. They considered it important that FBOs have the impression that contraventions would be followed up regardless of which OV is present. In order for this to happen, they explained that improvements of the entries recorded in enforcement logs needed to be made to ensure that officials could be kept up to date with the sufficient level of detail to enable officials to act consistently.

## 8.2 Views of official controls in slaughterhouses

### Views of the delivery of official controls

Participants were asked to comment on three official controls: ante and post mortem and audit. Of interest to FSA in terms of the ongoing review of official controls in slaughterhouses was how these official controls are understood and to explore views about improvements to the delivery of meat controls which could help safeguard the general public and animal welfare.

In general participants felt that delivery of official controls in slaughterhouses helps to ensure meat is FFHC and that animals are treated humanely. However, there was some agreement that some inspection tasks may not be fit for purpose while some also questioned whether an independent individual is needed to carry out some inspection tasks.

### Ante mortem inspection

The common perception, that the only way to ensure that meat is FFHC is to kill an animal and present it for post mortem inspection, leads many to put more importance on post mortem inspection.

“I am a purveyor of top-quality meat. I don't need to go and sell sh\*t in the shop to make a fast buck. I have spent 40 years establishing my reputation do you think I am willing to let my reputation disappear for a sh\*t pig. Now the reality is that the pig was passed at ante mortem but condemned at post mortem. To me the ante mortem is a resource that doesn't need to be there.”

FBO

While for most FBOs animal health and welfare was hugely important in itself, the evidence shows that for one or two FBOs with whom we spoke, animal welfare and health were viewed as less crucial. In these instances FBOs typically faced acute commercial pressures and often viewed animals simply as a commodity. FBOs working in smaller plants questioned whether the role of the OV was necessary. Many spoke about cursory checks and questioned the suitability of some OVs even to conduct ante mortem inspection due to their perceived limited knowledge of certain species.

“I know more about animal welfare than him. Plus he should be doing more in the lairage, it was just a cursory check. Have the animals got water for example.”

FBO

In contrast, FBOs in larger plants tended to favour the OV conducting ante mortem (see Chapter 9 below).

### **Post mortem inspection**

Many think that sensorial inspection (i.e. visual, palpation and incision) is needed. However, when asked about the inspection regime’s effectiveness for ensuring safe meat, both officials and a few FBO respondents recognised some of the limitations of current inspection tasks in identifying pathogens.

Most officials were familiar with most risks today being microbiological (e.g. e-coli, salmonella), and it was OVs who spontaneously reported the limitations of post mortem inspection.

Some MHIs were reluctant to discuss this issue in detail as they said that they were worried that this would bring extra scrutiny of their role, which in turn could have implications for their employment. That said, when probed, some MHIs did point to the limitations of the inspections they conduct, and some even mentioned that sensorial inspection can contribute to the spreading of contamination around the carcass.

“A lot of incisions aren’t needed and these probably contribute to contamination.”

MHI

As indicated in Chapter 9, many were of the opinion that post mortem inspection should always be conducted by an individual independent of the business. An example cited was that, despite presence of officials, faecal contamination continues to be a common problem in slaughterhouses. Some officials believed that the removal of independent inspection would lead to a worsening of this problem.

### **Audit**

Most FBOs did not take the FSA audit (conducted by OVs) seriously. This was based on one of three assertions: perception of auditor not being qualified to make a judgment; view of audit focus lacking a link to the main risks perceived; and view of audit findings and their veracity.

With the exception of a few FBOs (in large plants), most felt it was not important to achieve a ‘high’ FSA audit rating. The few who felt it was important did so because of a concern that a low score might affect customer contracts rather than because of a desire to meet any regulatory obligations set by the FSA.

It was explained by participants that requirements of customer audits on FBOs for the 'product to look good and have good shelf life' appeared to convince FBOs to think that the visible condition of the meat is the priority.

However, in contrast, others suggested that customer audits were more stringent than those done by FSA. It was also felt that the FSA audit is too focused on paperwork, and more effort should be put on verifying kept records (e.g. temperature checking of refrigeration units).

"Audits should focus more on procedures than paperwork. They ask for your temperature controls records but then don't actually check the refrigeration. I could write anything in there."

FBO

This perception of an over-reliance on paperwork being in order appeared to reinforce the view among slaughterhouse staff that audits do not reflect slaughterhouse realities, which can help to explain why audit results are not taken seriously by some FBOs.

"If you have all the procedures in place a good filing system, you can pass the FSA audit; this isn't necessarily the case with supermarket audits."

FBO

Opinion was divided among officials in relation to who should conduct audits. Many participants doubted that OVs were best suited to conduct the audit of the entire plant as it was felt that OVs did not have sufficient knowledge of farming, the meat industry in general or of slaughtering (activity in the production area) to be able to conduct an assessment of the whole plant.

OVs who encountered resistant FBOs advocated that OVs with no ties to the plant should be responsible for audits. They suggested that audits by an external OV might be viewed by FBOs as more objective (i.e. mitigating any FBO concerns about biased findings) which in turn might encourage them to tackle non-compliance. However, this view was countered with the suggestion that some resistant FBOs might simply refute findings they disliked, or question the reliability of the findings on the basis that the external OV had a limited knowledge of their plant.

Educator OVs believed that plants should be audited by the 'resident' OV. They felt that it was important that the auditor had a good understanding of the plant as this would help to ensure that emphasis was put on verifying that previous hazards continued to be controlled and would reduce the likelihood of 'missing something' i.e. non-compliance which could potentially impact on the general public.

MHIs often shared this view for similar reasons but, because they perceived OVs as having limited knowledge of production, they questioned how effectively OVs

could audit non-compliance (in production areas) which, as a result, convinced some MHIs to think they could take a role alongside OV's in delivering an audit.

## **Sampling**

Many believed there was simply no viable alternative to the current post mortem inspection. While there was some recognition of the limitations of the current regime in identifying pathogens, sampling every single carcass was considered unworkable (because it would slow down production). However, many officials advocated extra testing for microbiological threats throughout the production area. While most accepted this approach would not provide an accurate indication of the possibility of pathogens, it could provide a better indication. They felt it would require the following changes:

- The carcass sample size should be increased to allow testing of extra carcasses;
- Testing for largely irrelevant pathogens today (e.g. BSE) should be abandoned; and
- Officials should have the powers to carry out extra sampling.

Extra testing was considered important in terms of safeguarding public protection but some proactive OV's felt that sampling results can demonstrate a failure in existing controls (e.g. HACCP) and, thus, can convince FBOs that remedial action is needed. However, delays in the time taken to get results from the lab can be a cause of frustration.

## **8.3 Impact of the current regime**

Research participants generally thought that the current regulatory regime is effective in ensuring that meat is fit for human consumption (FFHC) (although some, particularly officials, caveat that this is only true insofar as this can be determined through visual inspection), and that animals are treated humanely.

Below we discuss in more detail some key features which relate to the impact of the current regime:

- Presence of officials can reduce bunching and cross-contamination
- Impact of the health mark
- Presence of officials has the potential to undermine legislative intent
- Barriers to tackling non-compliance
- Risk of apparent lack of harmonisation across the EU

## **Mitigates bunching and cross-contamination along the line**

A common view among officials was that pressure on speed of production of meat is the key driver of behaviours in slaughterhouses. As a result, officials felt their presence was important to reduce the risk of cross-contamination caused by the bunching of carcasses due to excessive line speed.

The evidence suggests that excessive line speed is common in many slaughterhouses as even FBOs working in some plants with sustained compliance reported this happens (in their plants). Officials felt that this situation would only get worse without the presence of an independent official.

“In other plants you stop the line and God help you.”

MHI

Two major issues discussed throughout this report seem to drive an increase in the line speed: a limited understanding of the possible risk from non-visible contamination and internal pressure from supervisors/management to fulfill customer orders (in large plants) or stay in business (medium sized plants).

Additionally, excessive line speed can arise at specific points, depending on the time of day, season and type of animal slaughtered.

Officials suggested that inclement weather tended to be a time when FBOs can put pressure on lairage staff to push through animals for slaughtering as quickly as possible out of a desire to avoid the cost and time of removing dirt or faecal contamination prior to slaughter which would slow down production. In these situations, FBOs said they trusted slaughterhouse operatives to de-hide an animal adequately without spreading contamination and, therefore, perceived a low risk of cross-contamination from any bunching that might happen as a result.

It was suggested by officials in a small number of plants that in order to ensure the planned daily throughput was conducted in the allotted time, FBOs sometimes increase line speed towards the end of their shift. This was considered particularly risky because the physically demanding and mostly repetitive nature of the job can result in a drop in standards towards the end of the day, especially with the increased likelihood of operatives “cutting corners” in order to finish “on time”. FBOs argued, however, that due to the shortage of livestock, few slaughterhouses operate at full capacity and, therefore, they suggested that increased line speed is unlikely to occur.

A changeover in the slaughtering process from cattle aged above or below 72 months<sup>30</sup> was also blamed for excessive line speed in some red meat plants. Officials reported that operatives become complacent when reverting to below 72 months animals due to these animals being considered lower risk.

---

<sup>30</sup> A negative BSE test result is mandatory for cattle slaughtered for human consumption at over 72 months of age.



## **Importance of a health mark**

To some extent there was a shared understanding of the health mark among officials and slaughterhouse staff: they believed a health mark meant a carcass had been verified FFHC by an independent inspector. In terms of impact, the health mark seems to discourage FBOs and slaughterhouse staff from taking full ownership of food safety because they were convinced that the legal responsibility for ensuring meat is FFHC is shared, due to an MHI being identified by the health mark. As indicated above the MHI view in relation to the health mark was somewhat different. It would seem there is need to better communicate the intended meaning of the health mark in order to build a shared understanding of FBO responsibility for food safety.

## **Presence of officials may undermine legislative intent**

As discussed elsewhere in this report, the presence of officials appears in some slaughterhouses to undermine legislative intent (i.e. FBOs taking responsibility for ensuring food safety). The reasons for this are summarised below and discussed in more detail in previous chapters.

- The purpose of the health mark outlined above lead many to think that responsibility for the end-product is shared.
- Analysis indicates that many regard officials as an “extra set of eyes” and a “safety-net” which often can lead to complacency among FBOs and slaughterhouse staff.
- Where officials take a ‘facilitator’ role, this can have a particularly strong impact on ownership, shifting it from the FBO to the officials.
- Despite the ‘no-knife’ policy, MHI trimming appeared to convince many to think that officials ‘will do it’ (i.e. removal of hair or faeces) which leads some to become complacent.

## **Barrier to tackling non-compliance**

The current regime drew criticism from several OV's (especially those who encountered reactive and resistant FBOs) as they believed tackling non-compliance is more difficult than under the previous one, which they described as more specific. These OV's said that the specificity of regulations in the previous regime made it easier for them to identify when action was needed, and easier for them to point out to FBOs and staff exactly where and how they were non-compliant. Officials were concerned that current legislation is open to varied and conflicting interpretations due to the intention to make regulation more proportionate and risk-based, which made regulatory decision making and explanation of decision making more difficult.

In addition, because there is a perception of interpretive room, officials said that they felt pressured (by the competent authority and FBOs) to provide irrefutable evidence that any breach of compliance may impact on the general public. This

issue was particularly evident in plants with either rare species or dilapidated buildings as officials said that they found it difficult to work out how to regulate without the aid of prescriptive guidance.

The challenge of providing the necessary evidence (many officials cited the limitations of the current inspection regime) that might convince FBOs of the potential for risk was sometimes viewed as a significant challenge. In the interviews some suggested that even strong evidence would have limited impact on certain FBOs, given the degree of confidence some of them had in their own 'tried and tested' food hygiene processes.

As a result, officials felt that some minor instances of non-compliance went unchecked because of their inability to provide compelling evidence that would be convincing to the FBO. A related issue described by some officials (both OV and MHIs) was the pressure of decision-making where there is limited opportunity to consult with other officials to strengthen or confirm their case, either because of inadequate support from line managers or because they were the only on-site official.

Given the perceived emphasis on subjectivity (i.e. an official's judgement) in determining risk, and the disagreements which can arise as a result, escalation to enforcement action was sometimes not considered to be an appealing option for officials.

"There are too many grey areas now. It's [regulations] too open to interpretation now."

MHI

A few officials spoke about instances when they did not act even when they had convincing evidence of (what they judged to be low-risk) non-compliance. This was particularly the case when they anticipated antagonism from either the FBO or slaughterhouse staff when seeking to engage with them over the non-compliance issue at hand. From experience, they believed that the FBO and slaughterhouse would only react to a request to rectify major contraventions or address high-risk issues and so the official would in effect 'pick their battles' which meant focusing on riskier matters in order to best protect the public. While cases such as these may suggest that some officials simply defer action for 'an easy life', and in some cases this did seem to be a reasonable interpretation, in most this was part of strategy on the part of the official in question to maximise improvements to compliance in slaughterhouses where the FBO was resistant or reactive but slow to put changes in place.

Officials also felt some regulatory terminology was vague and open to different interpretations, thus making it more difficult to effect change. Officials felt words like "reasonable", "adequate" and "undue delay" could result in corrective action not being taken by FBOs. Indeed, a view among proactive FBOs in large plants was that this ambiguity left them feeling unsure about what corrective action might be needed. This was viewed as particularly frustrating when inconsistent

interpretation by officials had led to enforcement action which the FBO viewed as unwarranted.

While respondents recognized that the legislative power to request improvement either through informal or formal processes lies with officials, where there is disagreement over how legislation is interpreted, the official's authority is sometimes questioned. Furthermore, even where an FBO accepted that the improvement being requested by the official was necessary, the ambiguity or lack of specificity of wording sometimes used by officials (e.g. "improve high-level cleaning") meant that it was possible for the official and FBO in question to hold different expectations of what form the corrective action should take. Officials said that FBOs often attempted to address their requests for improvement using the minimum effort, which led these officials to question the effectiveness of remedial action in terms of controlling the same risk in the future.

Observations of enforcement logs and served notices showed that a clear and simple message (limited use of acronyms and legal terminology) could help reassure FBOs about what improvements were necessary. It appeared that ensuring that FBOs were clear about an official's expectation was vital for raising standards and often this did not appear to be the case in the existing records. Being clear about expectations and backing them up with reference to regulations was seen to allow officials to enforce more easily, as a shared understanding of the rules is typically a precursor to an acceptance of the need for corrective action. Officials, especially those who advocated an educative approach, explained that FBO understanding was only one factor that can drive behaviour change. Their experience had led them to believe that regulatory messages surrounding compliance are more likely to be acted upon if they are communicated as "good for business".

## **Regulatory harmonisation**

A common view among OVs was that the current regime provided a standardised regulatory model in slaughterhouses across the European Union which they felt was important for public protection due to the amount of meat traded between EU countries.

However, a common perception among FBOs was that the enforcement of regulation is more robust in slaughterhouses across the UK compared with Europe. While a few believed that enforcement was less stringent in France and some southern European countries, and specifically that it was possible and common to operate a slaughterhouse without the permanent presence of an OV in these countries, such views appeared to be based on hearsay and conjecture rather than any defensible evidence. This perception of being over-regulated convinced some FBOs working in small and medium-sized plants to believe that standards in their plants are 'good enough' and probably better than many of their EU counterparts.

## **Chapter 9: Respondents' suggested improvements to the regulation of slaughterhouses**

When asked about improvements to the current regime, participants spontaneously said that FSA should 'sort out' the worst plants as it was felt that certain weak plants tarnish the reputation of the whole industry. FBOs suggested that by closing down weak plants (i.e. 'risky' plants) the competent authority might then be able to reduce some of the regulatory burden on the industry either by allowing industry to take responsibility for some official tasks or by allowing some measure of earned recognition.

### **Key findings**

- 'Taking responsibility for official tasks' in the future was advocated by some but officials thought this would lead to unsafe meat entering the food chain, and even some FBOs rejected this idea due to concern about the reputational damage that it could have on the industry as a whole.
- Earned recognition was favoured by some officials and FBOs. They felt that some businesses could be rewarded by a reduced regulatory oversight, which they believed might enable an increased focus on non-compliant plants. It was thought that verification could then be provided by third party external audits or unannounced inspection conducted by an independent official.
- Many FBOs argued for an increased focus along other parts of the food chain. They thought that farmers should have more responsibility for the cleanliness of supplied livestock and retailers, and consumers should be better educated about the storage and handling of meat once it has moved along the food chain.

Before discussing views of suggested improvements to regulation in slaughterhouses, it is important to bear in mind that the views of officials may be influenced by external factors. Officials often interpreted questions in relation to regulatory reform as referring to the removal of officials from slaughterhouses, even though it was explained the study had no predetermined outcome. Despite the fact these assurances were provided by researchers this belief among MHIs may still have affected what they told us.

This chapter discusses three potential options: industry taking responsibility for some official tasks; earned recognition, and changes to the regulation regime from farm to fork.

## 9.1 Industry taking responsibility for some official tasks

There was some recognition by officials that the current regime is disproportionate to risk. However, they felt that full autonomy was too risky and would most likely result in an increased risk to the general public. Many officials spoke about not wishing to see the red meat industry go down the same path as the white meat industry (i.e. the FBO employee being given responsibility for post mortem inspection given certain requirements are met). This view was largely expressed by MHIs who felt that independent post mortem checks they administer were crucial for safeguarding the consumer. By contrast, FBOs working in the white meat industry felt the investment in post mortem inspection they had made as a result of gaining some form of autonomy had helped them to ensure that their end-product was FFHC.

Officials argued that inadequately trained FBO-employed inspectors and a perceived conflict of interest would lead to a fall in standards and expose the public to increased risk from unsafe food. However, officials in white meat plants professed to be happy with the standard of work of the PIAs employed by the slaughterhouse, and none advocated a return to directly government-employed inspection for post mortem.

A widely held view among FBOs in small plants was that they could take responsibility for ante mortem inspection because they or their staff had farming backgrounds which equipped them with the necessary knowledge and skills to conduct ante mortem inspection.

“Get rid of the OV it’s just a tier of cost that you have to absorb but in my experience they don’t do anything that I can’t do in fact I know more about handling my animals than they do.”

FBO

Only one or two FBOs in larger plants (both red and white meat) said they would prefer an independent person to conduct ante mortem inspection. Where it was preferred this was based on the belief that independent inspection at ante mortem was important for their customers.

There was an opinion among some FBOs (in larger plants) that permanent presence of OVs may not be needed – as long as this met with customer agreement – and instead they suggested compliance could effectively be monitored by unannounced daily or weekly ‘spot-checks’ conducted by OVs. A few OVs supported this view, as they felt as long as it was conducted at different time of the day and week this type of approach would enable officials to identify any variability in the compliance.

Many FBOs rejected the idea of fully autonomous self-regulated post mortem inspection as they thought that independent inspection was vital for consumer confidence in the end-product. When probed about consumer understanding of regulation in slaughterhouses, there was widespread acknowledgement that consumers have limited knowledge of what takes place. Indeed, it then became

evident that rejection of self-regulated post mortem was based on one or more reasons:

- It could result in “risky” meat entering the food chain (from other SHs) and this could have implications for trust in the industry as a whole, and consequently their business;
- (t could undermine trust in global food markets and thus affect exports;
- It could lead to fraud (e.g. tampering with passports or batch codes); and
- It could make it difficult to keep up-to-date with dressing techniques e.g. facial cheek muscle of an animal.

“So we’re looking at ways to try and reduce the risk of contamination and the MHI has shown the slaughterman a different way to do it [evisceration] that reduces the amount of hand contact and getting it dirty. The MHI is passing on their knowledge so we do benefit from them.”

FBO

Overall, the industry being given responsibility for some official tasks would potentially be well-received by some, but it was thought that more autonomy could lead to lower standards in slaughterhouses run by resistant and reactive FBOs and possibly would not be welcomed by proactive FBOs who felt officials provided them with expert advice.

## 9.2 Earned recognition

Unlike the divided opinion in relation giving all plants more responsibility for delivering official controls, the idea of earned recognition was favoured by both officials and FBOs. They felt that some businesses could be rewarded with some form of flexibility (in terms of how official controls are delivered) which they believed might enable an increased focus on non-compliant plants. While lighter touch regulation across the industry was considered a step too far, there was an acceptance of either a reduction in regulatory oversight or provisions made for greater flexibility for some plants provided there was an element of independent verification. Although participants had not considered in detail how earned recognition might work, the general assumption was that plants who had achieved sustained good compliance would be rewarded with a reduction in or removal of official presence, for example being granted the right to operate without an OV presence at all times. As regards the external verification element, there were two distinct approaches put forward by participants: third party external audit (i.e. reliance on customer audits or those by other third party assurance schemes); and unannounced inspection conducted by an independent official.

Many FBOs and a few officials advocated the use of audit findings by customer and third party assurance schemes as a means to verify hazard controls in

slaughterhouses. However, OV's questioned the ability, knowledge and desire of external auditors to ensure that adequate controls and practices across the plant adhere to legislative requirements. By way of an example, one OV working in a white meat plant reported an external auditor from a large retailer who recommended the illegal killing of chickens (by asphyxiation). Furthermore, some officials suggested that external auditors did not share FSA priorities, as they said that their experience had convinced them that auditors did not focus on all aspects of slaughterhouses which FSA consider important. For instance they were said to put much more emphasis on the lairage (i.e. ante mortem checks) in comparison with food safety checks throughout the rest of the plant.

One or two officials commended some external audits (in particular high-end large retailers) which they felt were more reliable and provide a more trustworthy assessment of standards by which to judge whole plant compliance.

“Food safety works well here ... the supermarkets run the place.”

MHI

However, unless all external audits adhered to standardised assessment criteria and were conducted by competent auditors then participants felt that findings from external audits should not be relied upon as a measure of compliance.<sup>31</sup> Some therefore suggested the preferred scenario might be unannounced inspections by independent officials (i.e. FSA employed/contractors).

### **Suggestions of alternative measures of risk to target regulatory intervention**

As a result of concerns about HACCP plans raised above, there was some support for using alternative measures in conjunction with audit ratings which it was felt could enhance any future decisions in relation to reducing regulatory burden in slaughterhouses.

- A common proposal among officials was that a qualitative assessment of FBO attitude towards animal welfare and food safety would indicate the likelihood of an FBO taking ownership of food safety
- FBOs working in compliant slaughterhouses suggested the number of detained and rejected carcasses as a proportion of throughput might be a useful indicator.

## **9.3 Suggested regulatory change along the farm to fork path**

As indicated above, a common perception among FBOs was that regulation of slaughterhouses is disproportionate to risk (in itself and in relation to other higher risk foods). As a result, this led many to argue for a focus along other parts of the food chain. The two most common concerns among FBOs were in relation to the

<sup>31</sup> It is worth noting that would this happen third party audits might not be based on legal compliance with all relevant legislation.

cleanliness of supplied livestock and storage and handling of meat once moved along the food chain.

### **On-farm controls**

It was evident that FBOs support for more on-farm controls was driven by a desire to reduce the burden (i.e. cost) of ensuring the removal of dirt and faeces from the animal's hair at the slaughterhouse.

“An animal can be up to his belly in faeces all his life but when he comes to a slaughterhouse he's got to have straw bedding, white walls, water and food. Now do we know that animal has had that at a farm? No we don't but we have those things here, and now you have to have a CCTV camera to make sure stunning is right but on a farm they are hammering it with sticks. Why pick on the end bit of the food chain?”

FBO

Many FBOs talked about efforts such as bedding and clipping prior to slaughter which they felt were costly to the slaughterhouse and should be expected of the farmer.

“A good farmer will wash and shave the underside of an animal because he knows this will make a better dressed animal.”

FBO

However, the research indicates that resistant, reactive and even some proactive FBOs did not routinely conduct bedding and clipping and, instead, slaughtered as quickly as possible due to the belief that de-hiding will remove contamination.

Many FBOs believed the Clean Livestock Policy put the responsibility on suppliers to provide clean livestock, and that this policy had been revoked. Consequently, many FBOs felt that any request they might make for delivery of cleaner livestock from their suppliers would currently go unheeded. They believed that the shortage of available livestock, increased consumer demand, and pressure to fulfill customer commitments placed suppliers in a powerful position. It appeared that some slaughterhouses accepted dirty animals out of a fear that suppliers will simply go elsewhere if FBOs raised a concern.

This belief convinced many FBOs to think that stringent on-farm controls are necessary. They continued to suggest this even when it was explained that delivery of official controls on farms might be more expensive to the UK taxpayer than the current regime as they felt it would be the only effective way to ensure that all animals arriving at their slaughterhouse were fit for slaughter.

Most officials rejected the notion of on-farm controls. They believed it would be prohibitively expensive to have OVAs carry out on-farm animal cleanliness checks throughout the UK. They also suggested farm vets could not be relied upon to



report inadequate standards in terms of animal cleanliness in case they put at risk any future work opportunities.

A few officials suggested that some action has proved successful in ensuring suppliers provided cleaner animals for slaughterhouses. One or two endorsed increasing support for farmers (e.g. advice on reducing prevalence of pathogens or disease) which in turn can encourage farmers to provide cleaner animals.

### **Focus on retailers**

FBOs working in small and medium plants (who did not supply direct to larger retailers) often called for the stricter regulation of retailers. They were concerned about consumers eating unsafe meat due to inadequate temperature control further up the food chain and the implications this might have on slaughterhouse reputation.

There was also a sense of injustice among some FBOs that they perceived retailers to be higher risk than slaughterhouses, yet they felt retailers benefit from a perceived light-touch regime. Again FBO opinion appears based at least partly on a misunderstanding, as many spoke about an inspection frequency for retailers of between two and three years which they felt was disproportionately low.<sup>32</sup>

### **Consumer awareness**

Finally, most FBOs suggested that ‘the Government’ ought to take steps to increase consumer awareness of how meat should be stored, handled, and cooked. Seemingly this view is based on one of two key assertions. First, a widely-held belief among FBOs that food poisoning as a result of eating meat is often caused by consumers who have a limited understanding of how raw meat should be stored and cooked. Second, a strongly held (and sometimes misplaced) belief that they and staff already do all they can to ensure that meat is FFHC.

“At the end of the day, it’s how you cook the meat that’s most important. Perhaps they [the Government] should teach people basic food hygiene.”

FBO

---

<sup>32</sup> Inspections of larger retailers are typically conducted by Local Authority food inspectors every six or twelve months (depending on factors such as historical compliance).

## Chapter 10: Conclusion and recommendations

As described throughout this report, every slaughterhouse is affected by a wide range of factors including different risks, staff and FBO knowledge and attitudes and understanding, resources, suppliers, officials (who make take different approaches) and customers. It appears that variation in the incidence and strength of the factors, and how they interact, can either drive or hinder ownership of food safety.

How these various factors interact with one another is not straightforward. For example, a longstanding experienced official commanding respect could lead to a good (responsive) working relationship but in a different slaughterhouse it could lead to over-reliance upon officials as a substitute for taking ownership of food safety. This has implications for how the FSA can monitor levels of food safety ownership, as observation of these complex interactions cannot be done “at a distance”, and there is no simple formula to predict the outcome in any particular plant.

As described in the previous two chapters, there was a widespread belief among respondents that the current regulatory regime ensures that meat is FFHC and animals are treated humanely<sup>33</sup>. However, it was also clear that the current regulatory regime can lead to frustration; indeed, many respondents felt the system could be significantly improved. FBOs criticised the ‘one-size fits-all’ model, with many, particularly those who were proactive with good HACCP scores, suggesting that good food safety management was not being recognised, i.e. rewarded, by the competent authority. Furthermore, some officials believed that sensorial inspection (i.e. visual, palpation and incision) post mortem inspection is not sufficient for tackling all of the microbiological risks present and, as a result, thought that some of the work aimed at ensuring public protection is misdirected.

This final section outlines some ideas on how some of these issues might be addressed within the current regime, and concludes with some thoughts on evidence gaps that may need to be addressed, especially in so far as they relate to regulatory reform.

### Equipping FBOs to take ownership of food safety

In order to fully take ownership of food safety, this research suggests FBOs need to have the knowledge and understanding, resources and the desire to do so.

The FSA and officials could potentially play a greater role in helping to ensure that FBOs are equipped with the **knowledge** they need to take full ownership of food safety. As outlined in Chapter 4, many FBOs do not share the FSA’s

---

<sup>33</sup> With the caveat that some are conscious the current regime does not address microbiological concerns

understanding of what food safety management entails. It was clear in many plants that FBOs had the will to comply, or at least were not actively resistant, but had a view of food safety that was carcass-focussed and therefore were not taking full ownership of food safety at a whole plant level. In particular, few FBOs spontaneously talked about the management of microbiological risks, and it may be that the FSA could choose to focus in particular on increasing FBO knowledge of these issues and why they are important. As outlined in the main report, this is likely to be most successful if the implications of not managing microbiological risks can be outlined with reference to commercial impacts.

A separate (though sometimes overlapping issue) was that some FBOs did not have a comprehensive understanding of the regulations and how they relate to food safety management or know how to comply fully with them. In some cases this stemmed in part from how the regulations are written, which allows room for varied interpretations (see Chapter 8). For example, some had incorrect ideas about the role and remit of officials, as the confusion around the 'no knife' policy demonstrates. In still other cases it was because the language used to set out the regulations is perceived as being overly technical and difficult to understand.

In addition, some FBOs lacked the knowledge to properly interpret written notices from the regulator to them, and sometimes complained that these were also difficult to understand and interpret. This was typically because the notices were seen to be insufficiently specific (e.g. "improve high level cleaning"). In some cases this meant that their efforts to comply fell short as they incorrectly interpreted these notices. Notices that have sufficiently specific instruction written in plain English and with limited or no use of technical terminology may be more likely to be acted on.

As outlined in Chapter 6, limited FBO understanding of food safety or knowledge of regulations was the reason that some officials took an educator approach, and the apparent effectiveness of this approach would suggest that the FSA might consider advocating that more officials do so (see next section). The permanent presence of the regulator offers a unique chance for the FSA to build this knowledge among FBOs. As the findings suggest, care must be taken with this approach to ensure that the educating role does not unintentionally change to a facilitating role which could undermine legislative intent if it discourages FBOs from taking ownership. Officials should ideally be aiming to build capacity in the business rather than directly improve the business itself.

There are other ways in which FBO knowledge could be further developed, such as offering subsidised training in local areas (if FBOs can be convinced of the value of the training), or actively disseminating information in simple language about how to interpret regulations and apply them in different types of slaughterhouse (by size, age of building or species). This could be particularly important for non-specialist OV in specialised plants (e.g. turkey, venison etc), or in plants where relationships are less functional and clarity would help the OV to assert their interpretation. It may be useful for the FSA to work with key stakeholder organisations to ensure industry buy-in on this approach.

Maintaining up to date knowledge was also a challenge for some FBOs. Changes to regulations and regulatory practice (e.g. how FBOs 'request, receive, check and act upon' Food Chain Information) require all FBOs to learn and adapt. Continuing efforts to limit the number and frequency of updates to regulations and regulatory practice is therefore important. Also, where changes are being introduced, it is important to ensure that clear guidance is provided to explain how to put changes into practice. Such measures could encourage more FBOs to take more ownership of food safety and may improve some FBOs perceptions of the FSA.

Lack of **resources** for compliance is an issue that is difficult to address by either officials or the FSA. Lack of adequate manpower (and in particular lack of supervision) to ensure that all compliance tasks are carried out and adequately documented in a way that meets FSA expectations was a clear problem in some small- and medium-sized slaughterhouses. This was partly a cost issue, and partly an unwillingness to prioritise compliance over other tasks in the slaughterhouse. In slaughterhouses where there is no supervision, staff understanding of food safety management needs to be better than in plants where their practices are being constantly monitored. Simpler and clearer instructions on recognising hazards and how to manage them, how to adhere to the regulatory requirements, record adherence, and why this is important could potentially help to instil greater understanding of risk assessment and management in plants where supervision is lacking. While it might be possible for FBOs to produce materials for their staff on a case by case basis, the FSA could look into creating sets of simple to understand communication packs including posters and booklets etc (or perhaps work with proactive slaughterhouses to develop these). Centralising the task could lead to efficiency savings, and would help reduce the resources required to communicate with staff. It would have the added benefit of ensuring consistency across slaughterhouses.

Fundamentally, slaughterhouses are unlikely to ever have/find sufficient resource for food safety if it is not seen as integral to the business. They might find resources for 'quick wins' such as those identified above, but all but the most proactive are also likely to require the 'stick' of regulation (and/or customer pressure) if they are to attribute appropriate resources to food safety. Additionally, there has to be seen to be an equal playing field: it is important for FBOs to see that their business is being advantaged or at least not disadvantaged with respect to the competition both at home and overseas. To fully 'own' food safety, it has to be (and has to be seen to be) integral to business success and not a barrier to it.

The **desire** to take full ownership is the most difficult issue to address. Among those FBOs who lacked the desire to do so, there were some whom it could reasonably be assumed would never take full ownership unless there were serious repercussions for not doing so (see next section). FBOs of this kind usually had adequate compliance scores, and were content to exist in a state of low-level tension with the officials on site, making changes only when forced by the escalation of enforcement action, or the threat of escalation. However, the evidence suggests that positive engagement with respected officials can be a means to changing FBO attitudes, by helping FBOs to understand the importance of compliance, potential benefits to business, and the potential consequences for

public health of not adhering to all of the regulations. This is likely to be a slow process, reliant on the use of highly skilled officials, not only in terms of their knowledge and understanding of the regulations, but also of the broader commercial issues and ability to communicate effectively.

### **Enabling officials to be more effective**

As FBOs have different mindsets and are operating in different conditions, reactions to the requests of the same official, made in the same way, would still vary from plant to plant. Where FBOs are proactive, the approach of the officials makes little difference to the final food safety outcomes. However, where FBOs are reactive or resistant, the OV approach can (although not always) be instrumental in encouraging the FBO to take or begin to take full ownership of food safety. In every slaughterhouse, OV credibility in the eyes of FBOs and slaughterhouse staff is crucial in establishing effective working relationships.

It is clear from the research that the officials' roles can be extremely demanding and sometimes isolating, and there are several ways that the FSA and contractors could consider selecting, training and supporting them in order to maximise their effectiveness.

#### **Selection of the right candidates**

- Ensuring where possible that selection policies for officials consider not only technical knowledge and skills but the personal attributes shown here to be important to an effective regulator, such as confidence, assertiveness and good communication skills. While some of this could potentially be taught, it will not be learned quickly 'on the job' and not having these attributes from the start will undermine the credibility, and therefore effectiveness of the official. This is most important for the selection of new OVs.

#### **Training:**

- Considering whether the training that officials are required to undertake adequately supports the soft skills necessary for effective regulation, particularly those relating to managing different types of FBO and staff. Contractors could offer support in developing these skills for current officials as part of their CPD.
- Providing training to increase consistency, to ensure that all officials are interpreting regulations in similar ways, and escalating enforcement action at the same tipping points. This could be repeated at regular intervals or when regulations change. Consistency of interpretation and escalation across slaughterhouses could help officials to have greater confidence in their enforcement decisions and potentially improve perceptions of fairness among FBOs and staff, which in turn could help improve relationships and make some FBOs less resistant to regulation messages.

### Other options for providing ongoing support:

- Mentoring of newly qualified officials by experienced officials from other plants in the area. This could include spending some time shadowing an experienced official, but more importantly would mean giving the new official someone to call if they are uncertain of how to proceed with regards to a specific issue. Access to a second opinion on day-to-day enforcement matters could greatly increase the confidence and effectiveness of inexperienced officials.
- Encouraging, a greater emphasis on teamwork among all officials within a plant to ensure that they present a united front to FBO and staff and are working together to increase compliance. This could perhaps be encouraged by ensuring that OV and MHs from the same plant attend consistency training together. Wider thought could also be given to line management structures, and clarifying how relationships are expected to function between different officials, especially when they might not have the same employer.
- Ensuring that those officials, especially OVs, in plants where relationships have deteriorated, have adequate support from line-managers, from the contractor and the lead veterinarian in the area, and that they know who best to approach when they need advice and guidance.
- External audits so that officials have 'back-up' in their approach and their requests are not just seen as personal whim but a valid and reasonable interpretation of regulations.

### Responsive and transparent regulation

A key finding of this research is that FBOs and some staff and officials thought that the current 'one size fits all' model is unfair. This negatively affects their attitude towards the FSA and compliance, where perhaps they would otherwise be more proactive. They called for a tailored response to regulation that includes them, and takes the particularities of each slaughterhouse into account. Chapter 9 describes the views of respondents around substantial changes to official controls and how they are carried out. These issues are currently the subject of review at EU level, and thus not discussed in this chapter. However, within the current regulatory regime, one way of trying to introduce more responsive regulation would be to plan resourcing carefully to try to ensure that high-performing officials - those with a good track record of building effective working relationships with FBOs and staff and securing increased compliance - are placed in plants with the weakest compliance where possible. Matching officials to the slaughterhouses which they are most likely to make a difference could help to achieve and sustain compliance, although clearly will be dependent on the willingness of officials to relocate.

Incentivisation could also help drive more positive attitudes to regulation and improved compliance. Currently there is little incentive for a small or medium sized slaughterhouse to improve their compliance scores beyond ensuring they are not classified as 'cause for concern'. An FBO with a stable and loyal customer base whose current HACCP score is 'adequate' does not appear to gain much by raising this to 'good'. However, if FBOs knew that taking ownership of food safety or improved compliance scores would lead to either a reduction in their charges for regulation, (maybe as a result of a reduced level of official presence at their slaughterhouse), then this could be a powerful tool to encourage improved compliance.

Another measure which might drive more positive attitudes towards the FSA would be to introduce more transparency around decisions on staffing levels for officials in each plant and the reasoning behind these decisions. Currently some FBOs were frustrated because they could not understand the principles behind the decisions, which became a particular cause of tension where the cost was seen to be disproportionate.

### **Evidence gaps**

The cost of regulation was not part of the scope of research as the charging model is currently under review. However, as outlined in section 4, the cost of regulation was an important factor in creating a resistant mindset among some FBOs, and a concern for all FBOs, even the proactive. Understanding the relative cost of regulation with reference to throughput and overall business performance, might allow for a better understanding of the economic barriers to improving compliance.

Many FBOs and slaughterhouse staff were of the opinion that third party external audits were more rigorous than FSA audits, although this was disputed by some. There is scope for research into the levels of rigour of external audits, whether this varies by auditor (both at company and individual inspector level), and which of the official controls are audited during these processes. This would allow scope to assess the credibility of arguments for industry taking more responsibility for official controls or earned recognition with these audits replacing some FSA oversight.

The anecdotal evidence collected by this study suggested that the increasing use of contractors for the employment of MHIs was having a detrimental effect on relationships in some slaughterhouses, and could be a source of tension where some MHIs were employed by contractors and others were not. Further qualitative research on this issue with a broad range of MHIs could help the FSA to understand the tensions at play here, and what different players could do to help to avoid or manage them if they have the potential to be detrimental to food safety outcomes.

Previous research has found that PIAs are just as effective as PMIs in protecting public health. Some FBOs argued that they should be allowed to directly employ red meat inspectors along the same principles as PIAs, whereas some officials

argued that red-meat inspection needs to be conducted by fully independent inspectors. An independent review of the evidence in this area would go some way towards addressing this debate. Alternatively, a randomised control trial utilising a lighter touch approach would be a way of developing a robust evidence base to inform policy.

Some FBOs appeared to have limited awareness of the range of regulatory modifications, especially in regard to the provision of flexibilities currently permitted under the current regime (e.g. cold inspection for low throughput plants). Indeed the FSA drew criticism as many believed the “one-size fits all” does not recognise the efforts of plants who demonstrate sustained compliance.

Therefore, it would seem there is scope to commission survey research to assess awareness among FBOs of the flexibilities within the current regime and use these findings to evidence efforts to reduce the regulatory burden on industry which in turn could improve the FSA reputation across the industry.

Finally, while it was clear that in slaughterhouses where the main customers were supermarkets or other very large retailers, customer pressure is a strong driver of their food safety behaviours, it was impossible to ascertain through this research the potential for harnessing customer power to affect the behaviour of FBOs and staff. Research into how FSA audit findings are viewed, understood and used by retailers (and/or end consumers) would go some way towards providing an answer to this question. This research could give the FSA insight on how best to design the audit so that they not only document the extent of compliance in a slaughterhouse but allow customers to make informed decisions about where to purchase their meat.





Slaughterhouse social science research project:

# APPENDICES

# Appendix 1: Discussion of research design and methodological challenges encountered during this study

The following provides a detailed account of the research design and how methodological challenges were dealt with. It also includes detailed discussion of the approach to sampling, recruitment, data collection and analysis.

## Aims and objectives

The research provided insight into the complex interplay of different internal (e.g. workplace roles and relationship structures) and external (e.g. customer influence) dynamics, and examined how these might impact on food safety behaviours. The research explored both how the current regulatory approach is working, and suggestions for its improvement.

Specifically the research objectives were to:

Develop an understanding of **current behavioural and social influences in slaughterhouses and their impact on processes and structures** (and vice-versa) and **consequently the implications for how official controls are delivered**.

- Explore in detail **what encourages or discourages duty holders and employees to take ownership of** food safety, in the context of the wider influences which exist in the workplace environment.<sup>34</sup>
- Understand **how veterinarians /meat hygiene inspectors approach enforcement** and how they decide what approach to adopt.

The findings are intended to help inform the on-going review of the delivery of official controls in slaughterhouses and thus help ensure that any possible changes to the current system are evidence-based. More broadly the research aims to help the FSA deliver its strategic aim that food produced or sold in the UK is safe to eat as a result of effective, risk-based, proportionate regulation.<sup>35</sup>

---

<sup>34</sup> During fieldwork, in order to avoid ambiguity the objective wording was revised from “to take responsibility for” to “take ownership of” in conjunction with FSA. As a result, subsequent fieldwork and analysis examined what factors can encourage/discourage ownership of food safety.

<sup>35</sup> The six outcomes FSA aim to deliver by 2015 are: foods produced or sold in the UK are safe to eat; imported food is safe to eat; food producers and caterers give priority to consumer interests in relation to food; consumers have the information and understanding they need to make informed choices about where and what they eat; regulation is effective, risk-based and proportionate, is clear about the responsibilities of FBOs, and protects consumers and their interests from fraud and other risks; and enforcement is effective, risk-based and proportionate and is focused on improving public health.

## Research design

In order best to meet the objectives of this study, a mixed-method approach was agreed in consultation with FSA, building on input from the Agency's appointed ethics advisor.

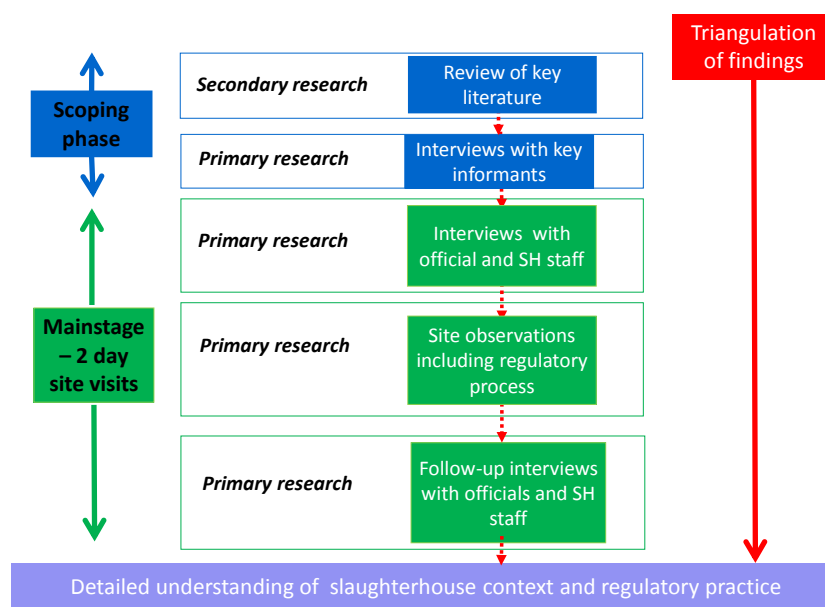
### Independent review of ethical sensitivities and risks

While Ipsos MORI abides by the MRS code of conduct and is accustomed to working in accordance with GSR ethical principles, the slaughterhouse environment can be considered a seldom researched space. This meant that careful consideration of the possible ethical sensitivities and risks that could occur during fieldwork was particularly important.

During the scoping stage, the Ipsos MORI research team provided an independent ethics advisor (appointed by the Agency) with a list of ethical considerations (grouped around the five key principles of the GSR ethical checklist<sup>36</sup>) and explained how, in collaboration with the FSA, these would be handled. The output of the ethics advisor's review broadly endorsed the outlined approach for dealing with the ethical challenges and informed the final research design signed off by the FSA. The ethics advisor made themselves available to the research team in case any advice was required with relation to emerging ethical risks. However, during fieldwork, no further ethical issues were identified.

A staged approach to data collection was used (see Figure 3), incorporating a variety of data collection methods and ensuring that each stage of the research built on insights which were gained previously.

**Figure 3: Methodology**



<sup>36</sup> [http://www.civilservice.gov.uk/wp-content/uploads/2011/09/gsr\\_ethics\\_checklist\\_tcm6-7326.pdf](http://www.civilservice.gov.uk/wp-content/uploads/2011/09/gsr_ethics_checklist_tcm6-7326.pdf)

## Scoping stage

At the outset, desk research<sup>37</sup> and 16 in-depth telephone interviews with key informants<sup>38</sup> (including representatives from the FSA, industry and professional organisations) were conducted. As well as providing insight into the slaughterhouse context and views of the current regulatory regime, findings from these interviews were used to inform the research approach<sup>39</sup> for the remainder of the study.

## Why case study visits?

Case study visits were chosen as they combine both depth and breadth, honing in on a relatively small number of slaughterhouses while collecting a wide range of insights from each by interviewing, observing and following various key players on each site.

The scoping phase (desk research and key informant interviews) of the research made the Ipsos MORI research team aware of the variability that exists between slaughterhouses which could have led us to explore ways of involving larger numbers of slaughterhouses. However, to include more sites within the budget would have required us to shorten each visit, potentially compromising our ability to build an in-depth understanding of the context in each slaughterhouse. Equally, there was some concern from others that 2 days may not be sufficient time for the observed to 'forget' the researcher presence which could potentially lead to some bias in the findings.

On balance, the FSA and advisory group agreed our proposal (24 x 2 day site visits) was a suitable methodology given the research aims and objectives, striking a balance between breadth and depth.

The key advantages of the method are outlined below:

- It allowed for both formal and informal interviewing techniques, supplementing depth interviews with ad hoc discussions and questioning of different players whilst researchers were on site
- By spending extended periods of time in slaughterhouses, researchers were better placed to build trust among key agents; important for ensuring open and honest discussions
- The combination of interviews and scrutiny of official documents alongside observations helped to mitigate against bias introduced by researchers being present

---

<sup>37</sup> Slaughterhouse social science research project: Desk research report for the Food Standards Agency (Feb 2012)

<sup>38</sup> Slaughterhouse Social Science Research: Key informant report for the Food Standards Agency (April 2012)

<sup>39</sup> Slaughterhouse Social Science Research: Revised methodological plan for the Food Standards Agency (May 2012)

- Two full days in each slaughterhouse was sufficient to enable an understanding of the range of attitudes and behaviours, while accounting for variation across slaughterhouses.

## **Anonymity and confidentiality**

It became evident during discussions with key informants and the FSA that it would be impossible for the Ipsos MORI team to offer anonymity at a slaughterhouse level because it would be impossible to ensure that FSA employees in slaughterhouses did not discuss the research with their superiors. However, within these constraints, we thought it was important to try and preserve anonymity as much as possible.

- Slaughterhouses that took part are not named in the final report;
- Findings are not be reported at an individual slaughterhouse level, nor in a way that could identify specific slaughterhouses;
- Verbatim comments are not used where respondents may be identifiable, and are attributed in a way that preserves anonymity;
- Raw data for this project will be destroyed once the project is complete.

One particular challenge in this regard is that FSA is the data owner (whereas typically for research of this type, Ipsos MORI would take this role). As such, researchers had to give assurances on behalf of FSA, rather than from Ipsos MORI, about how their personal data would be used and processed.

## **Sampling**

### *Key informant interviews*

For in-depth interviews with key informants we spoke with representatives from a range of organisations. These included trade organisations, professional bodies and government representatives. The sample was agreed in advance in conjunction with FSA and we achieved interviews with 16 of the 19 organisations identified (the other three felt they would not have sufficient information to add, or were unavailable during the fieldwork period). In order to encourage informants to be open we offered full anonymity to the organisations and individuals interviewed.

### *Slaughterhouse visits*

As outlined in the introduction to this report, we visited a total of 20 slaughterhouses spread across Great Britain, and an additional four in Northern Ireland.

We sampled by four key variables; **compliance rating, geography, type of meat and size of slaughterhouse**, which were tested during the key informant interviews to ensure they were appropriate. We set hard quotas for each of these

variables as outlined below. This approach enabled us to gain access to a broad range of types of slaughterhouses while not spreading the sample so thin that we lost the ability to compare slaughterhouses which ‘seemingly’ displayed the same characteristics, but ‘culturally’ could be very different.

It was felt that setting quotas by **FSA audit rating** would be a good proxy for food safety behaviours in slaughterhouses. We over-represented weak plants in our overall sample (4 in total) compared to their proportion in the slaughterhouse population. This was because we wanted to be able to compare weak plants with other plants in our analysis, and a smaller number of case studies would have prohibited us from doing this. During the research it became evident that the FSA audit rating of HACCP sometimes did not reflect official’s perceptions of food safety behaviours on the ground. As discussed in the main report this was largely because FBOs did not take FSA audit seriously. However, overall the sample included a broad mix of attitudes and behaviours.

While we did not propose to analyse the results by **geography** given the sample size, it was important we included an adequate number from each of the devolved nations. This was because key informant research suggested that attitudes and behaviours surrounding regulation in slaughterhouses may be in part a product of the history of meat regulation and the particularities of the meat industry in different areas. We also monitored regions during recruitment to ensure a good spread of slaughterhouse type across England.

We also set quotas by **type of meat** (i.e. red or white meat). We monitored the species that were slaughtered in each of the plants that we sampled to avoid an overconcentration on particular species.

Sampling by **size of slaughterhouse** (level of throughput) was important because of the different external and internal pressures on slaughterhouses by size. We oversampled small and medium slaughterhouses as it was suggested by several key informants that aspects of the legislation can be more challenging for certain such plants, and that processes were likely to be less formalised might display more variation.

Finally we proposed to recruit at least one slaughterhouse in which **slaughter without stunning** is practised. However, due to the limited number of halal/kosher plants in the FSA/DARD database, it was not possible within the fieldwork timescale to recruit one. Despite this researchers did visit several slaughterhouses in which Halal slaughtering was practised as part of a larger operation.

#### *Achieved sample breakdown*

The slaughterhouses selected were chosen to reflect the full range of slaughterhouses in the UK on a number of key variables. We visited the following:

Compliance band	Level of throughput			
	Low	Medium	Large	Total
Good	4	4	2	<b>10</b>
Adequate	4	4	2	<b>10</b>
Weak	1	2	1	<b>4</b>
Total	<b>9</b>	<b>10</b>	<b>5</b>	<b>24</b>

### Achieved quotas for other key variables:<sup>40</sup>

Meat:	19 red meat
	5 white meat
Geography:	4 Northern Ireland
	3 Scotland
	3 Wales
	14 England

Using the key criteria chosen, we shortlisted 120 slaughterhouses (from the FSA/DARD database), in order to recruit twenty-four. Based on advice from key informants this sample size was considered a sufficient ratio (5:1) to overcome any difficulty in engaging FBOs and low response rates after making contact, while minimising the potential for recruiter bias.

## Recruitment

### Key informants

In agreement with the FSA, the key informants were initially approached by email, with a letter attached explaining the purpose of the research, what it would involve, and clarification about the research's independence from the FSA. One of the research team then followed up the email with a telephone call to explain the research further and answer any questions from the key informant. This process was carried out until sixteen key informants agreed to take part in the research.

<sup>40</sup> It was not possible to recruit either a fully halal or fully kosher plant, partly due to the fact that these plants were not flagged on the database provided by FSA. Researchers did visit plants where halal killing was practiced, but this was not observed (or thought by respondents) to make any difference to behaviours, enforcement or compliance, hence it is not commented on in the report.



### *Slaughterhouse visits*

Key informant research suggested that engaging FBOs and officials could be a challenge. In order to raise awareness of the study, provide reassurance to potential participants, and mitigate any concern about taking part in the study, the FSA publicised the research through the FSA Operations Unit/contractor agencies (responsible for the delivery of official controls in slaughterhouses) and the industry bodies.

For each case study visit we made initial contact with the FBO. It was ultimately its plant that we visited and, in the main, its staff whom we intended to interview and observe. It was felt that accessing the slaughterhouse via officials might have led the FBO and staff to question the research's independence and motives.

Recruitment was the responsibility of members of the core research team, and telephone calls to businesses acted as the first point of contact between a researcher and the site they would later visit. Keeping recruitment within the core team ensured that researchers were well-informed about the research objectives and were well-placed to explain the scope of the research and answer questions about the intended outcomes or specifics about the visit itself.

This encouraged buy-in from FBOs and started the research off on the right footing. Researchers presented the research as a chance to help to inform policy on the future delivery of official controls and reassure FBOs that their role is not 'investigatory'. In several instances it was necessary to provide reassurance: for example, confirming researchers would not make an assessment of the performance of the individual or organisation. It was agreed that researchers would explain that all identifiable data would be deleted with immediate effect following the completion of fieldwork to reassure potential respondents that their anonymity could be preserved in the event of a Freedom of Information request (given that the contract required FSA rather than Ipsos MORI to be the data controller).

Our approach to handling illegal/non-compliant behaviour observed or mentioned was prepared in advance of recruitment, but no individuals requested this information. It was included in the assurances provided to each individual interviewed/observed and is outlined in the fieldwork section below.

We informed 120 FBOs in slaughterhouses (selected from the FSA database using the criteria above) about the research project and from this we recruited 24 slaughterhouses. 25 refused for reasons outlined above and the rest weren't required to meet quota so were not pursued.

The steps in our recruitment process were as follows:

- Each of the 120 plants was sent out an advance letter from Ipsos MORI and the FSA, outlining the objectives and asking permission to visit their



plants. This helped to encourage participation and convince participants that their input would be valuable and meaningful. The letter provided contact details of the Ipsos MORI project team and FSA/DARD personnel for verification purposes.

- Our initial letter was clear and transparent (see appendix 2) in describing the research, and informed FBOs that the FSA's current objective was to explore a range of options for delivery and changing of official controls and investigate improvements for regulating the sector.
- At the same time as contacting FBOs, a separate letter was sent to OVs at each plant, informing them about the research, inviting their support and participation. The letter also requested they inform on-site MHIs should they not have heard about the research via FSA internal communications.
- After a three-day grace period, researchers began making the initial calls to FBOs to secure involvement and arrange dates for the case study visits.
- Initially it was felt that FBOs would need a further 2 day period to consider if they would like to take part and this was planned for in the project timetable. However, most FBOs decided at the point of first contact whether to opt in to the research. Key to success was recruiters who sounded credible and who were flexible with timing. Having a long enough fieldwork period enabled us to spend longer recruiting some slaughterhouses where necessary.

Once the FBO agreed to host either a one- or two-day case study visit (depending on size of plant) visit they helped us in the process of engaging their staff, while stressing the voluntary nature of participation in interviews for the research. Separately, and where it was possible, we telephoned OVs and potentially senior MHIs to request their support and confirm our independence if questioned by FBO or plant staff.

## Before the visit

### *Pilot visits*

The first two case study visits acted as a pilot, after which we reviewed the method and, in discussion with the FSA, added several probes to the discussion guides. For example, a key area of interest was exploring how food safety was understood by participants. In addition, the pilot visits provided useful material that was used to brief the rest of the fieldwork team and raise awareness about the slaughterhouse environment.

### *Information gathering pro-forma*

We designed a pro forma which enabled the senior researcher to capture the information they needed to get from the FBO at the point of recruitment. This included information about hours of operation, throughput, who the slaughterhouse supplies, workforce size, managerial structure (e.g. duty holder

and supervisor), roles (e.g. production and technical team), nature of regulation workforce (e.g. number of MHIs), work and break patterns and when different respondents were most likely to have time to talk.

Information on the workforce was crucial in deciding who exactly to speak to in each slaughterhouse. Within the plant staff category, we looked carefully at the staffing structure in each slaughterhouse we proposed to visit, and, as appropriate, spoke to supervisors, those with responsibility for hygiene, production and technical matters, and any others in relevant roles (e.g. slaughter foreman).

### *Posters and leaflets sent to business*

It was useful to communicate with plant staff before conducting the visits. We sent leaflets (we tested both posters and/or leaflets in the pilot visits) to each of the slaughterhouses in advance of the case study visits and asked FBOs to distribute these to staff. In some instances using leaflets helped to secure engagement (ultimately it was mostly done via agreement with FBO), and it gave us a first opportunity to highlight the independent nature of the research, the voluntary nature of participation in interviews, the anonymity of participants and the confidentiality of any data passed to us.

### *Setting up interviews*

It proved difficult to arrange interviews in smaller plants where staffing levels meant that it was impossible to arrange cover and, as a result, a few FBOs having given their agreement to take part then pulled out of the research. While every effort was made to accommodate visits with these plants in some instances it was not possible to reschedule a more suitable time. The use of quotas (see above) ensured those plants whom did pull out were simply replaced with another plant selected from the FSA database with the same characteristics (size, meat type, rating). As a result, plants who either declined to take part or pulled out at short notice had no impact on the agreed research design.

In larger plants this was not an issue as FBOs had sufficient resources to be able to arrange staff cover. Taking as flexible an approach as possible was key to the successful completion of the case study visits and in many instances it was only possible to agree type of participants (i.e. individual role) before arriving on site and, once there, we agreed interview timings around business needs. In some cases this meant interviewing commenced at 06.00am.

Officials and, in particular, the OV had somewhat more flexibility in their work but are a cost to the business and some FBOs did not appreciate us taking up the official's time and therefore declined to take part. Several also declined because the line was not able to function without a replacement MHI. Although arranging cover for officials was considered, these issues did not sufficiently hinder recruitment and was not pursued.

### *Facilitating interviews*

A sound inclusion/non-exclusion policy was vital both methodologically and ethically to ensure that de-selection on language grounds should not occur. However, during recruitment it became evident that SH staff involved in meat production had a sufficient level of English language thus allowing them to be interviewed. Indeed, one learning from recruitment is that most non-English language speakers tended to be involved in the boning and cutting plants (an area of slaughterhouses outside the scope of this study).

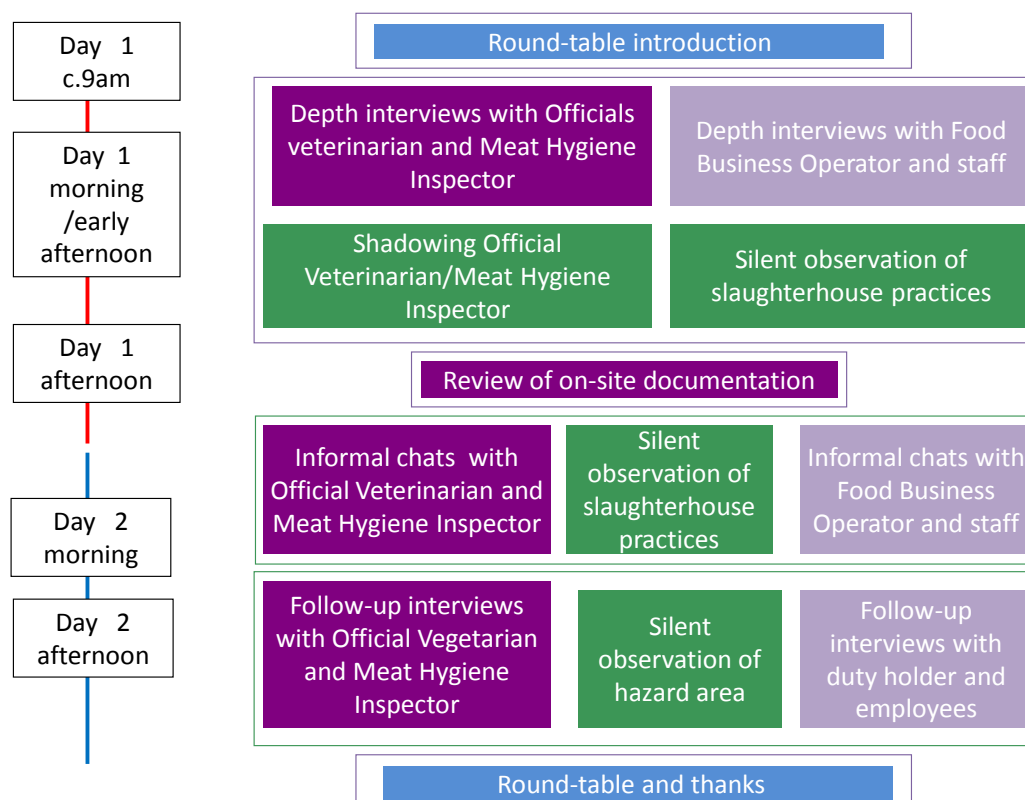
### *Preparing the team*

In line with the risk register outlined below, a number of measures were adopted to ensure the research team were sufficiently supported throughout the project. This included:

- Ensuring each team member saw an educational video about slaughterhouses before their first visit to prepare them for what they would see.
- Conducting the research in pairs, to ensure that all researchers had peer support during and after the visits.
- Counselling sessions (group and individual) arranged and 24 hour support line available to all researchers.
- Notification to line managers to keep close eye on individuals involved in the project, with regular reminders.

## **Case study visits**

The diagram below outlines the proposed approach to research activities during the two-day case studies. Timings and order of the activities varied from slaughterhouse to slaughterhouse, and a provisional timetable was created for each case study visit before arrival.



On arrival at the slaughterhouse, the senior Ipsos MORI researcher introduced himself or herself and the purpose of the visit. Due to on-going meat production the briefing typically involved FBO and plant supervisor while introductions to officials were made while being toured around the site.

Regardless of the setting, these brief introductions gave researchers the opportunity to reassure all those who would be the intended focus of the research that the Ipsos MORI researchers were independent of the FSA or any government organisation and that their intention was to find out what goes on, and why, but not pass judgement on current practices or make assessment of their performance (e.g. assessment of an individual's evisceration skills).. It was important to confirm that the FSA would not request information about individual participants and they would not be identifiable in our reporting, as this would affect the nature of people's responses or behaviour. This introductory stage was essential for facilitating engagement and respect from target respondents over the course of the two days.

All reassurances about the voluntary nature of the research (e.g. right to withdraw from the interview at any point), confidentiality, anonymity (e.g. anonymised attribution), and, if necessary for reassurance, our agreed approach to handling mentions of illegal behaviour were repeated at start of every interview as well. The full text of these reassurances is included at the start of the discussion guides appended.

Specifically, it was agreed with FSA that researchers would explain that in order to comply with MRS guidelines around confidentiality any unsolicited comments on

illegal behaviour would not be communicated to others. Furthermore, in the event that respondents should request these views be communicated, researchers would remind them of the different reporting channels available to them e.g. work colleague, supervisor, trade union representative, and the Agency. Ultimately, however, none of the respondents we spoke with reported any illegal behaviour.

### *In-depth interviews*

In-depth interviews with each of the key respondents in slaughterhouses helped us to understand how each of the different groups (FBO, officials and staff) understand their own roles in relation to food safety, and provided greater insight into the relationships within each slaughterhouse to begin to build up a picture of the social context therein. Flexible depth interviews:

- Allowed interviewees to feel comfortable and therefore candid when speaking about their relationships with FBOs/colleagues/managers/officials
- Allowed researchers to build trustful relationships with respondents where they addressed the concerns of respondents – especially hostility between different respondents that may otherwise have made them unwilling to take part
- Aided the data collection process by minimising the strong social norms and macho responses that existed within group dynamics in a male-dominated workplace. Indeed it was for this very reason why focus groups were considered inappropriate with this audience.

Over the course of the two days, we conducted 4-6 depth interviews with each of our three target respondents: officials (OVs, MIs, etc.), plant employees with a range of different responsibilities and the FBO. The scoping phase of the research had confirmed that the range of respondents we proposed to interview was broadly correct. With regard to officials, we spoke to both senior and junior MHIs where they existed, and PIAs and PMIs in white meat slaughterhouses.

Within the slaughterhouse staff category, we spoke to supervisors, those with responsibility for hygiene, supervisors and any others in relevant roles. Within larger plants we conducted interviews with both production and technical plant staff, as it was thought that the people carrying out these roles may have very different attitudes to food safety and different relationships with officials.

Typically, the majority of interviews were conducted by the senior researcher while the junior researcher sat in and took detailed notes. Having experienced facilitators in place helped respondents feel comfortable in an unfamiliar setting which meant they were able to be candid and open when expressing their views. The note-taking meanwhile ensured a detailed record of each interview which helped researchers develop a comprehensive write-up of each site visit. This proved invaluable during analysis given the number of interviews conducted across so many different sites.

Interviewers used a discussion guide (see appendix 2), that informed the course of the interview and ensured that the same key areas were covered during interviews with each participant of the research. As with all in-depth interviews, our researchers used the guide flexibly, and were responsive to the topics raised by the interviewees.

The initial in-depth interviews lasted between 60-90 minutes with FBOs and OV's, and 30-45 minutes with MHIs and slaughterhouse staff.

All fieldwork materials were developed using an iterative approach, where we produced drafts and invited feedback from the FSA, and where possible discussed these draft materials during face-to-face meetings.

### *Follow-up interviews*

Follow up interviews lasted around 15 minutes, and did not follow a structured guide (although some of the same topics may have been covered) but were used to triangulate findings from all the interviews and observations until that point.

Follow-up interviews were typically conducted on day two of the visit with some of the same people that took part in in-depth interviews on the first day, allowing researchers to talk through the details of what had been observed and discussed so far and so better understand emerging findings. Researchers had a better feel for the environment of the particular slaughterhouse, and had witnessed the relationship dynamics existing between different key players.

We were careful not to address the topic of 'relationships' too directly or playback exactly what had been observed during follow-up interviews to avoid impacting the discussion and causing people to respond self-consciously. It was down to the expertise of individual moderators to steer the follow-up interview appropriately and adopt the right tone, to ensure open and insightful discussion.

### *Silent observations*

At least 2 hours per site were allocated to silent observation; a sufficient amount of time given the sometimes limited interactions during production, while allowing flexibility to enable researchers to be responsive to the plant set-up.

A crucial part of understanding behaviours in the slaughterhouse environment, and the factors underpinning the delivery of official controls, was *seeing what key players actually did, not just what they say they did*. From Ipsos MORI's experience of looking at food safety issues in food establishments, we know that controlling and tackling the hazards involved is an on-going practice that needs compliant attitudes towards food safety to be sustained. The optimum means of finding out about it was therefore through observation and follow-up questioning.

The rationale for keeping this observation work silent was that commonly once you have started asking someone about what they do they can become overly conscious of their activity and are more likely to give rationalised, thought-out responses. Another reason to keep silent in the slaughterhouse environment was due to the dangers inherent in distracting employees whilst they work.

As with all research of this nature, there is potential for the researchers themselves to affect observed behaviours. The team minimised this through the use of:

- a) extensive briefings on the slaughterhouse environment, and;
- b) an observation aide memoire and note taking pro-forma (see appendix 2) that focused on the research questions (while allowing scope for other observations that the researcher might think is important).

In agreement with FSA, researchers did not look for evidence of compliance/non-compliance during the observations (although we did find evidence of poor food safety behaviours), but focused on roles, relationships and interactions.

#### *Informal chats with plant staff*

In observing key players in action and having collected initial data from a range of different perspectives, we then conducted informal chats with plant staff wherever possible. We kept these fairly informal and short, sometimes speaking with people during their breaks or right at the end of their shift. These informal chats were unscheduled and respondents were chosen by the researcher rather than FBO/OV to reduce bias. They were predominantly follow-ups related to things we observed during the silent session i.e. researchers used this discussion to probe around processes we observed staff carrying out and specific areas where we saw them interacting with officials.

#### *Review of site-specific documentation*

The purpose of the review of site-specific documentation was to aid the researchers understanding of site specific context; for example what historical problems had occurred and how these were handled. Where appropriate researchers would draw on these examples in interviews to help to build understanding on actions that could either help or hinder ownership of food safety. We aimed to review a certain number of documents on each site (e.g. the day book, enforcement log and enforcement notices). However this was not always possible mainly because some officials felt they had not been adequately informed about the research and thus were reluctant to allow researchers access to what they considered sensitive documentation.

Where we did examine such documentation across case study sites, it gave researchers an additional understanding of animal health/welfare and food safety behaviours in slaughterhouses and an insight into how specific cases were dealt with. During interviewing researchers drew on these cases to build a more detailed and nuanced understanding of the slaughterhouse context.

### **Approach to data collection, notes and analysis**

To ensure the quality of data collection, topic guides for the in-depth interviews focusing on the research questions were developed before fieldwork. As outlined above, we also created an observation aide-memoire to record notes during

fieldwork. During fieldwork almost all interviewees agreed to be interviewed, and the few who did decline (typically MHIs) explained they had not been told about the research and therefore did not feel able to give their view.

The primary reason for having two researchers was for their own safety and wellbeing. However, this approach also helped to minimise researcher subjectivity during analysis and interpretation of research findings. During the visit itself, and at the end of each day, researchers shared initial insights on the basis of interviews and observations. This encouraged a discursive approach to analysis and provided a useful element of data “sense-checking” between researchers. It was particularly helpful given the large quantity of data collected, including interviews but also observations.

During fieldwork the team met weekly, and at the end of fieldwork the full team met for structured analysis sessions. Constantly updating the project team on new fieldwork findings, sharing stories from the field and drawing comparisons between the data allowed the project team to develop thinking and begin the process of sorting data into themes which could be used for subsequent analysis sessions. This iterative approach to analysis allowed the research team to develop hypotheses which were then tested in the later stages of fieldwork. For example, one of the key topics of interest explored further following initial analysis was how ‘food safety’ was defined and understood by each audience and how this affects behaviour.

At the outset it was agreed with FSA that interviews would not be transcribed as it was suggested by key informants that some recordings may be unusable due to noise levels in the slaughterhouse, and it was anticipated (correctly), that a large number of respondents would not wish to be recorded due to concerns about privacy. Therefore, researchers took detailed field notes including short verbatim quotations while conducting the case studies and also, after each visit was completed, filled in a structured notes template. This pro-forma (in Word) focused on the research questions but also provided space to record other thoughts and observations thus allowing comparisons to be made between interviews and across slaughterhouses. The pro-forma can be found in Appendix 2.

Analysis of detailed case-study write-ups including verbatim quotations allowed report writers systematically to cross-check common themes and interesting outliers (i.e. views of a sub-group where they differ from the whole) and understand the context and meaning of interviewees comments, as well as deriving the maximum value from of the data collected.

## **Meeting the research challenge**

A study of this nature and scope presented several challenges to the design and conduct of the methodology. The most important methodological challenges and the measures taken by the research team to address them are outlined below.

## **Ensuring researcher understanding and knowledge surrounding slaughterhouse and regulatory context**



The core research team carried out a detailed document review at the outset of the project. The findings from this, along with those from the key informant interviews, were used to inform a detailed methodological plan which was circulated to the steering group for review. This plan was then circulated to the wider fieldwork team along with a comprehensive briefing document to ensure that all of the team had a sufficient knowledge of the slaughterhouse and regulatory context. The core project team were taken on a guided tour around a slaughterhouse before their first fieldwork visit and briefed the rest of the team on this, as well as screening a filmed documentary about the slaughtering process, which ensured that all researchers who undertook fieldwork were prepared for what they would encounter.

### **Ensuring a valid sample**

The key variables above allowed for the stratification of the FSA database of slaughterhouses. Once the key variable quotas had been decided with FSA, the database was stratified by Ipsos MORI and a sample was randomly selected from within each stratum to ensure that researchers had sufficient leads to recruit. We then recruited to quota from the sample. Care was taken during the recruitment process to explain the research in clear terms and ensure that the FBOs understood that the researchers were independent, and that the research was exploratory. The research team is satisfied that this meant that those who agreed to take part represented a range of slaughterhouses and FBOs, rather than just those with a positive attitude towards regulation. Most of those who refused to take part did so on the grounds that they were too busy, or for other practical reasons. Where specific people declined to be interviewed in specific slaughterhouses, this was taken into account in analysis of that site.

### **Minimising the impact of a researcher's presence on respondent behaviour**

Researchers explained the purpose of the research in clear language from the outset, starting with the introductory letter, in recruitment phone calls and introductory chats with the key respondents. This allowed researchers to reassure those involved both prior to the research and during the fieldwork visit. Researchers were flexible during the visits; arranging interviews and observations to minimise disruption on the business and regulatory work. Observations were carried out in silence to minimise the observation effect on data and ensure that workers were not distracted.

### **Minimising researcher subjectivity**

A structured approach was taken to data collection to ensure that the research questions were explored in a similar way in all the slaughterhouses visited, which allowed researchers to give each case study equal weight during analysis. Fieldwork was conducted by pairs of researchers which helped to limit subjective bias in the reporting of each case study. Weekly group analysis meetings were held throughout the fieldwork period to allow all of the researchers involved to share of initial findings, encourage each researcher to challenge their own assumptions about the findings and consider a number of possible interpretations

and begin sorting the data into themes which could be used at subsequent stages of analysis.

### **Ensuring quality of data collection and analysis**

To ensure the quality of data collection, topic guides for the in-depth interviews focusing on the research questions were developed before fieldwork. As outlined above, we also created an observation aide-memoire to record notes during fieldwork.

To minimise researcher subjectivity during analysis and interpretation of research findings, we chose to use paired-researcher visits. During the visit itself, and at the end of each day, researchers shared initial insights on the basis of interviews and observations. This encouraged a discursive approach to analysis and provided a useful element of peer feedback.

During fieldwork the team met weekly, and at the end of fieldwork the full team met for structured analysis sessions. Constantly updating the project team on new fieldwork findings, sharing stories from the field and drawing comparisons between the data allowed the project team to develop thinking and begin the process of sorting data into themes which could be used for subsequent analysis sessions. This iterative approach to analysis allowed the research team to develop hypotheses which were then tested in the later stages of fieldwork. For example, one of the key topics of interest explored further following initial analysis was how 'food safety' was defined and understood by each audience and how this affects behaviour.

At the outset it was agreed with FSA that interviews would not be transcribed as it was suggested by key informants that some recordings may be unusable due to noise levels in the slaughterhouse, and it was anticipated (correctly), that a large number of respondents would not wish to be recorded due to concerns about privacy. Therefore, researchers took detailed field notes including short verbatim quotations while conducting the case studies and also, after each visit was completed, filled in a structured notes template. This pro-forma (in Word) focused on the research questions but also provided space to record other thoughts and observations thus allowing comparisons to be made between interviews and across slaughterhouses.

Analysis of detailed case-study write-ups including verbatim quotations allowed report writers systematically to cross-check common themes and interesting outliers (i.e. views of a sub-group where they differ from the whole) and understand the context and meaning of interviewees' comments, as well as deriving the maximum value from of the data collected.

The table overleaf summaries the challenges and the approaches adopted throughout the research design to ensure study outputs were robust and useful are included in the table overleaf.

Methodological challenges	Approach taken	Benefit of approach
<b>Ensuring researcher understanding and knowledge surrounding slaughterhouse and regulatory context</b>	Extensive background reading and review of key documents (inc. published research as a result of FSA's Review of Meat Controls, the FSA's Meat Industry Guide, and FSA Board papers)	Thorough reading during set-up phase provided lead researchers with an understanding and awareness of key issues affecting slaughterhouse context and the delivery of regulation therein. This informed the design of fieldwork materials and recruitment decisions.
	Core project team toured around a slaughterhouse prior to commencing fieldwork	Provided researchers with an understanding of the do's and don'ts surrounding health and safety before undertaking site visit. Also, it ensured the project team had a solid understanding of different slaughterhouse functions, which maximised the value of time spent in each slaughterhouse
	Entire project team watched the BBC "Kill It, Cook It, Eat It" programme prior to commencing fieldwork	Ensured the entire project team had an understanding of the slaughtering and regulatory process. The core team attended several showings and were able to point out differences between working and mocked-up slaughterhouses
	Project team with consistent members from start to finish	As researchers developed their understanding of key issues, a stable team made it possible to share insights easily and reduced the risk of an individual entering the field uninformed
	Close working relationship with FSA and expert advisory group, regular reporting on emerging findings at key stages and de-brief meetings	Expert and up to date information was shared during meetings with the FSA project team and wider internal respondents. Meetings also provided a useful point of verification for the Ipsos MORI team as emerging findings were shared and next step decisions made collaboratively
<b>Ensuring the research provided a credible evidence base to withstand scrutiny</b>	Conducting slaughterhouse site visits and observing meat production and regulatory work	Relationships, interactions and behaviours were understood within the live context of a slaughterhouse and data on actual as well as reported behaviour were collected to compare with data collected during interviews
	Independent assessment of Ipsos MORI ethical considerations	Research design acknowledged and put in place contingency to deal with ethical aspects associated with this sensitive project

<b>Minimising impact of a researcher's presence on audience behaviour</b>	Explaining to key respondents the purpose of the research from the outset and providing an explanatory leaflet prior to arrival at each slaughterhouse	By presenting the research as independent of the FSA and focused on understanding rather than assessing, key respondents were reassured and put at ease prior to and during site visits. Introductory chats with key respondents, where the independence of the researcher was explained, secured trust
	Staying sensitive to the research environment and carrying out observation work in silence	Minimising the researcher's interaction with key respondents during observations allowed for a 'fly on the wall' perspective that guarded researchers against collecting affected data during observation work. It also ensured we did not distract staff from conducting important tasks
	Being flexible while conducting on-site fieldwork	Accounting for business need and shift patterns enabled researchers to speak with the necessary participants in sufficient detail, while ensuring the research retained the support of the FBO
<b>Minimising researcher subjectivity during analysis and interpretation of research findings</b>	Structured approach to data collection	Pro-forma documents to ensure questions were asked in the same ways, and captured in the same ways on all sites. This ensured equal weight could be given to all the sites in analysis process
	Structured weekly internal analysis sessions to debrief on fieldwork findings	Constantly updating the project team on new fieldwork findings, sharing stories from the field, and drawing comparisons between the data allowed the project team to develop thinking and begin the process of sorting data into themes which could be used for subsequent stages of analysis. Analysis of the full dataset (via detailed case-study write-ups and recordings) ensured that "louder" voices at such sessions did not bias findings
	Paired researchers enabled ongoing review of findings from the field	Due to the amount of data collected during the site visits, continual contact between paired researchers was crucial for informal 'downloading' of the data and on-going analysis of findings
<b>Ensuring quality of data collection and</b>	Discussion guides and observation aide-memoire	Research materials agreed with FSA listed key areas to explore while visiting slaughterhouses, ensuring that all researchers were focused on similar points of interest and collecting data in

<b>post-fieldwork analysis</b>		an organised format
	Detailed fieldwork notes including verbatim and audio recordings	Ensured a rich and detailed dataset was collected for each site visit
	Structured and systematic analysis of full data set	Detailed case-study write-ups under thematic headings and specific research questions allowed comparisons to be made between interviews and across sites

## Appendix 2: Research materials

### Discussion guides

#### FSA Slaughterhouse Social Science Research Project

##### KEY INFORMANT Discussion Guide FINAL

#### Research background

The key purpose of the research is to understand how the regulation of slaughterhouses works in practice: how official controls are delivered and the environment in which this happens. The research is designed to provide insight into the complex interplay of different factors such as personalities, attitudes towards regulation and business, workplace relationships and communications. The research needs to explore both how the current regulatory approach is working, and also explore how structures, agencies, processes and outcomes are likely to evolve in response to regulatory reform. Specifically the research objectives are to:

- Develop an understanding of **current behavioural and social influences in slaughterhouses** and **their impact on processes and structures** (and vice versa) and **consequently the implications for how official controls are delivered**. To do this we will need to understand how the slaughterhouse has arrived at its current structures, how different player's roles are perceived (by themselves and others) and how they interact.
- Explore in detail **what encourages or discourages duty holders and employees to take responsibility** for food safety, in the context of the wider influences which exist in the workplace environment. In particular understanding the relative impact of attitudes of senior management, the approach of the Official Veterinarian and Meat hygiene Inspector, and other influencing factors.
- Understand **how veterinarians /meat hygiene inspectors approach enforcement** and how they decide what approach to adopt. This is likely to vary depending on the personality of the individuals involved, as well as the situations they find themselves in.

#### Key informant interviews

We are conducting c.15 key informant interviews from across the meat industry and key relevant organisations. Each interview should take around 45 minutes.

The purpose of these interviews is to develop our understanding of the market and regulatory context in which slaughterhouses operate, provide insight into the views of important organisations in the meat industry and sense-check our proposed method for the main stage of the research.

The fieldwork period for this project is the 5<sup>th</sup> to the 16<sup>th</sup> of March.

#### IF NEEDED

**Official Veterinarian (OV)** – the vet who is posted full time in a slaughterhouse and who is responsible for ensuring compliance and for conducting inspections

**Meat hygiene Inspector** - (sometimes called the meat inspector) works alongside the OV to oversee compliance and conducts tests once the animal is dead (post-mortem)

**Food Business Operator (FBO)** – named person who works in the slaughterhouse responsible for ensuring compliance (in small businesses likely to be owner, in larger businesses is likely to be the duty manager)

**Staff** – for the purpose of this interview we are interested in any other staff working in the slaughterhouse (i.e. anyone other than the person with ultimate responsibility for ensuring compliance). Please probe for perceived differences between staff (e.g. management vs shop floor etc)

Guide sections	Notes	Guide timings
<b>1 &amp; 2 Introductions and background</b>	Sets the scene, informs participants about the research and reassures them about the interview, confidentiality. In particular, FSA will not see individual responses.	5 mins
<b>3 Understanding the key agents within slaughterhouses</b>	To explore key issues that arise in the interactions and relationships between the regulator and regulated and understanding attributes of more and less functional relationships.	10 mins
<b>4 Current regulatory regime</b>	To understand how well and who for the regime currently works, and what things help / hinder regulatory process.	10 mins
<b>6 Changes to official controls in slaughterhouses</b>	To explore and identify potential for regulatory refinement, and why. This will help to inform any conclusions and recommendations we might make.	5 mins
<b>7 Conclusion, methodology sense-check and thanks</b>	A summary of the interview and discussion of the design of slaughterhouse visits in this light of what has been discussed	15 mins

## Using this guide

We use several conventions to explain to you how this guide will be used. These are described below:

Timings	Questions and Prompts	Notes
5 mins	<p><b><u>Underlined</u> = Title:</b> This provides a heading for a sub-section</p> <p><b>Bold = Question or read out statement:</b> Questions that will be asked to the group if relevant. Not all questions are asked during fieldwork based on the moderator's view of progress</p> <ul style="list-style-type: none"> <li>- Bullet = prompt: Prompts are not questions – they are there to provide guidance to the moderator if required.</li> </ul>	
How long it takes	Typically, the researcher will ask <b>questions</b> and use the prompts to guide where necessary. NB: Not all questions or prompts will necessarily be used in an interview	This area is used to summarise what we are discussing and is for your information only

Timings		Notes
5 mins	<p><b>1. <u>Welcome and introduction</u></b></p> <p>My name is X and I am calling you from Ipsos MORI, the independent research agency. We are conducting the interview today as part of the slaughterhouse social science research project that we have been commissioned to carry out by the Food Standards Authority. <b>Thank you very much for agreeing to be interviewed.</b> The conversation should take around <b>45 minutes</b>.</p> <p><b>Outline research aims</b> (previous page – respondent should already be familiar from recruitment e-mail)</p> <p>Our role as independent researchers is to gather the opinions of stakeholders in the meat industry and from relevant organisations. We are not looking for any particular answers; all of your opinions are valid, there are no right or wrong answers.</p> <p>In accordance with Market Research Society Code of Conduct, and the rules for Government Social Research, <b>participation</b> in this interview <b>is voluntary</b> and you <b>can</b> refuse to answer any</p>	<p>As very small, FSA-supplied sample, we will only be</p>



	<p>individual question or to <b>withdraw</b> from the interview for whatever reason. We will not be informing the FSA which individuals or organisations took part in this research and we will endeavour to ensure your feedback is anonymous. However we need to point out that your organisation was suggested by the FSA as they consider its participation important to the direction of the study.</p> <p>Can I please have your <b>permission to record</b> this interview? We will use the recording for <b>analysis purposes only</b> (i.e. the recording will not be passed on to the FSA). We may include quotes from your answers in our report, although where will <b>not</b> do so in a way that will allow you to be <b>identified</b>. If at any point you would like a response to not be recorded, please let me know and I will take comments 'off the record'</p> <p>We will be using the answers that you and other interviewees give us to prepare a <b>short written report</b> for the FSA and to help to inform our methodological plan for the case study visits to slaughterhouses. The information will only be used for this research project and not for any other purposes. The recordings will be deleted once the project is complete (September 2012)</p>	<p><i>using quotations where it is possible to ensure that the respondent cannot be identified. This may limit the number we can use.</i></p>
	<p><b>2. <u>Background</u></b></p> <p><b>To start, can you tell me a bit about your job, the organisation you work for, your role and responsibilities</b></p> <p>PROMPT:</p> <ul style="list-style-type: none"> <li>- Length of time in role</li> <li>- Experience in the meat industry, including any time spent in slaughterhouses</li> </ul> <p><b>Overall, how effective does your organisation think that the current regulatory regime in slaughterhouses is in ensuring food safety? Why?</b></p>	<p>Broad question will help us to gauge top of mind concerns and decide where to concentrate discussion later in the interview</p>
10 mins	<p><b>3. <u>Understanding the key agents within slaughterhouses</u></b></p> <p><b>Who do you think are the most influential people in slaughterhouses? What kind of influence do they have?</b></p>	

	<p>PROMPT:</p> <ul style="list-style-type: none"> <li>- Who is listened to? PROBE FOR EXAMPLES</li> <li>- Who makes the final decisions? PROBE FOR EXAMPLES</li> </ul> <p><b>Briefly, can you talk me through their key roles, responsibilities and priorities?</b></p> <p>PROMPT:</p> <ul style="list-style-type: none"> <li>- FBO – Food business owner</li> <li>- Manager (if not FBO)</li> <li>- Official Veterinarian</li> <li>- Meat hygiene Inspector</li> <li>- Staff</li> </ul> <p><b>How / when do... interact?</b></p> <ol style="list-style-type: none"> <li><b>The Official Veterinarian (OV) and the Meat Inspector (MHI)</b></li> <li><b>The owner (FBO) and the regulators (OV/MHI)</b></li> <li><b>The plant staff and the regulators (OV/MHI)</b></li> </ol> <p><b>What factors influence how they interact?</b></p> <p>PROMPT:</p> <ul style="list-style-type: none"> <li>- Size of slaughterhouse</li> <li>- Cultural issues (language, ethnicity)</li> <li>- Meat type</li> <li>- Ownership</li> <li>- Personalities</li> <li>- What else?</li> </ul> <p><b>ASK AS APPROPRIATE</b></p> <p><b>How would you describe the typical relationship between the regulators (OV/MHI) and the regulated (FBO/Manager/plant staff) in slaughterhouses?</b></p> <p><b>How would you describe the typical relationship between OV and the FBO/manager?</b></p> <p><b>How would you describe the typical relationship between OV and the plant staff?</b></p> <p><b>How would you describe the typical relationship between MHI and the FBO/manager?</b></p>	
--	--	--

	<p><b>How would you describe the typical relationship between MHI and the plant staff?</b></p> <p><b>What kind of attributes does an effective regulator (OV, MHI) need? Why?</b></p> <p><b>And what kind of skills? Why?</b></p> <p><b>And what kind of knowledge? Why? What else makes a competent regulator?</b></p> <p><b>What would be the tipping points that cause a regulator to move from an informal (coaching / advisory, written warnings) to formal (remedial action notices or hygiene improvement notes – RANs and HINs) regulatory approach?</b></p> <p><b>What type of behaviours would a compliant FBO display?</b></p> <ul style="list-style-type: none"> <li>- Leadership Hazard Analysis and Critical Control Point (HACCP) documented <u>and implemented</u></li> <li>- Staff training</li> <li>- Internal auditing (<u>only relevant</u> to big plants)</li> <li>- Good cleanliness and maintenance of premises</li> <li>- Good animal welfare standards</li> <li>- What else?</li> </ul> <p><b>What questions would you ask of people to get a good insight into the relationships between them, knowing what you do about slaughterhouses?</b></p>	
10 mins	<p><b>4. <u>Current regulatory regime</u></b></p> <p><b>What do you see as the purpose of the current regulatory model in slaughterhouses? i.e. permanent presence and the use of official controls</b></p> <p><b>Is it working well / less well? Who for?</b></p> <p><b>What aids / prevents a good regulatory outcome in slaughterhouses? i.e. what makes it more likely that slaughterhouses</b></p>	

	<p><b>might produce safe food?</b></p> <p>PROBE IN FULL ON EACH:</p> <ul style="list-style-type: none"> <li>- FBO-regulator relationship (professional vs. over-familiar)</li> <li>- FBO / plant staff attitude (i.e. ownership of compliance)</li> <li>- Regulator mindset (educator vs. enforcer)</li> <li>- Regulator characteristics (experience, personal authority, confidence e.g. escalating to enforcement)</li> <li>- Economic (supply chain pressure, time, financial issues)</li> <li>- What else?</li> </ul> <p><b>What are the typical indicators of non-compliance and how can they be identified?</b></p> <p>PROMPT:</p> <ul style="list-style-type: none"> <li>- Cross-contamination (zoonoses, microbiological)</li> <li>- Cleaning and hygiene</li> <li>- Structure (e.g. floors, walls)</li> <li>- Documentation/record keeping</li> <li>- Health and safety</li> <li>- Animal welfare</li> <li>- What else?</li> </ul> <p>PROBE FOR EXAMPLES</p> <p><b>At what point(s) in the slaughterhouse process do you think non-compliance is most likely to be observed? Why?</b></p> <p>PROMPT:</p> <ul style="list-style-type: none"> <li>- Arrival of animals</li> <li>- In the lairage</li> <li>- Ante mortem inspection</li> <li>- During processing (dressing / evisceration)</li> <li>- Post mortem Inspection point</li> <li>- In the chiller</li> <li>- What else?</li> </ul> <p>PROBE FOR EXAMPLES</p>	
5 mins	<p><b>5. <u>Changes to regulatory regime in slaughterhouses</u></b></p> <p><b>How could regulation in slaughterhouses be improved?</b></p>	

	<p><b>PROMPT:</b></p> <ul style="list-style-type: none"> <li>- FBO ownership of the compliance process</li> <li>- Better regulators (e.g. consistency training)</li> <li>- Changes to regulatory model (e.g. resources focused on high risk SHs)</li> <li>- Removing the requirement for continuous presence of officials</li> <li>- Changes to enforcement action (e.g. regulator's toolbox).</li> <li>- Education of FBOs on the regulations and their purpose (better understand of regulation and what food safety means)</li> </ul> <p><b>TAKE EACH IN TURN AND ASK: What would need to be in place to make this happen?</b></p> <p><b>What impact would a risk-based and proportionate regulatory regime have on your organisation/ outcomes in slaughterhouses?</b></p> <p><b>What would this mean for the people you represent?</b></p>	
15 mins	<p><b>6. <u>Conclusion, methodology sense check and thanks</u></b></p> <p>Sum-up key points from the discussion.</p> <p><b>Bearing everything we have discussed in mind, I'd now like to discuss the design of our slaughterhouse case study visits with you. Looking at the slides I e-mailed you...</b></p> <p>Talk respondent through the proposed sample and case study design from slides (which will be sent to them in advance)</p> <p><b>Are we visiting the right range of slaughterhouses?</b> If not, what is missing? Which are less important?</p> <p><b>Are we speaking to the right people?</b> If not, who else should we be speaking to??</p> <p><b>Are we speaking to them in the correct order?</b></p>	

	<p><b>Is there anything we should bear in mind when speaking to each of the different audiences?</b>  <b>PROMPT:</b></p> <ul style="list-style-type: none"> <li>- FBO</li> <li>- OV</li> <li>- MHI</li> <li>- Plant Staff</li> </ul> <p><b>What do you think we should focus on in the interviews? How about in the observations? What should we be looking/listening out for that will be signs of whether regulation is/is not working? What specific documentation do you think would be most helpful to review?</b></p> <p><b>Should our method vary according to the type of slaughterhouse?</b>  <b>PROBE:</b></p> <ul style="list-style-type: none"> <li>- Size</li> <li>- Slaughter pattern</li> <li>- Meat type</li> <li>- Other</li> </ul> <p><b>Is there anything specific you think we could do to help motivate engagement with the research and openness in responses among each of the audiences?</b></p> <p>Thank and close</p>	
--	---	--

**FSA – Slaughterhouse Social Science Research Project**  
**Case study visits - OV/MHI - Discussion Guide – DEPTH INTERVIEWS**

**Objectives:**

*NB this section is for researcher benefit to remind them of the key objectives of the research as agreed with the FSA. When outlining the research to respondents please explain it in simple, everyday language (see intro section).*

The key purpose of the research is to understand how the regulation of slaughterhouses works in practice: how official controls are delivered and the environment in which this happens. Key research questions for the project overall are:

- Develop an understanding of **current behavioural and social influences in slaughterhouses** and **their impact on processes and structures** (and vice versa) and **consequently the implications for how official controls are delivered**.
- Explore in detail **what encourages or discourages duty holders and employees to take responsibility** for food safety, in the context of the wider influences which exist in the workplace environment.
- Understand **how OV/MIs approach enforcement** and how they decide what approach to adopt.

Please see the detailed research questions grid for specific research questions of relevance to this discussion guide (questions are referred to in second column on the left):

Guide Sections	Research Questions	Purpose	Guide Timings
<b>1. Introductions and background</b>	A2	Sets the scene, reassures participants about the interview. Discuss the career history and biography of the participant which provides useful background.	5 mins
<b>2. Work environment</b>	B1, B2	Allows participant to begin to discuss the particularities of the SH in which they work, how it operates, how compliance is treated.	5 mins
<b>3. Risk and regulatory regime</b>	A3, B5, B6	Explores participants own attitudes towards risk and the management of food hazards, as well as their views of the current regulatory regime.	10 mins
<b>4. Roles/responsibilities</b>	A1a, A5-A7	Explores participants understanding of their own role and the role of others in the SH with relation to food safety, animal	10 mins

		welfare and how well they and others carry out their roles.	
<b>5. Relationships and Communications</b>	A4-A5, C4-C5	Allow participants to describe their interactions with others in the SH, how they communicate, and how that could be improved.	10 mins
<b>6. Approach to Regulation</b>	B4a-B6	Explores attitudes towards compliance, the actions they take to try to ensure compliance in the SH, and views on how well this works.	10 mins
<b>7. Future regulation</b>	B7	Discusses respondents' views of strengths and weaknesses of current regulatory regime in light of current challenges and emerging risks. Explore potential improvements to current regulatory regime and implications. Also discusses how best audits could be carried out.	5 mins
<b>8. Conclusions</b>		Identifies key messages and sums up.	5 mins

### Using this guide

The following is a guide for the flow of discussions. It is not a script or questionnaire and interviewers may not ask all questions during every interview, or follow the exact order. We aim to cover all of the following material across the sample as a whole. However, the amount and depth of coverage typically varies according to the individuals interviewed.

We use several conventions to explain to you how this guide will be used. These are described below:

<b>Timings &amp; Research Questions</b>	<b>Questions</b>	<b>Notes and Prompts</b>
5 mins A2	<p><b><u>Underlined</u> = Title:</b> This provides a heading for a sub-section</p> <p><b>Bold = Question:</b> Questions that will be asked of the participant if relevant using appropriate language (which may not be the same as the language in the guide). Not all questions are asked during fieldwork based on the researcher's view of progress, the respondents' answers and time pressures.</p> <p>- Bullet = prompt: Prompts are not questions – they</p>	This area is used to summarise what we are discussing, and, where necessary, provides informative notes for the



	are there to provide guidance to the researcher if required.	researcher
How long it takes & the specific research questions that this section focuses on	Typically, the researcher will ask <b>questions</b> and use prompts to guide where necessary. Not all questions or prompts will necessarily be used in an interview. Where individuals are willing, the timetable allows and the material justifies interviews, will be extended, and conversely, other, less productive interviews may be slightly shorter than outlined below.	

### Key points to bear in mind:

FBO/MHI/OV: Where these are referred to, please use the name of the person or their title within that particular slaughterhouse i.e. 'How often do you have contact with the FBO' might be 'How often do you have contact with John/Mr. Doe/the owner/the technical manager.

Food safety/animal welfare: Where pressed for time, please be aware that the FSA is particularly interested in the views of respondents on food safety, thus probe on this rather than on animal welfare if necessary to cover all the topics.

Time pressures: Issues around time pressures on those working in SHs are seen to be particularly important by the client. If these are mentioned by respondents, please follow up in as much depth as possible. In addition, try to arrange any observations to coincide with these times, if at all possible.

Risk/hazard/threat: We are interested in the language that respondents use to describe risk within SHs – please note the language that they use and reflect it back, substituting the language in the guide.

Timing	Key Questions	Notes
5 mins A2	<p>My name is X from Ipsos MORI, the independent research agency. We are speaking with you today as part of research we are carrying out on behalf of (the social science research unit at) the Food Standards Agency looking at how people in slaughterhouses keep us all eating safe food. <b>Thank you very much for agreeing to be interviewed.</b> The conversation should take around an hour/half an hour.</p> <p><b>Outline research aims in appropriate everyday language for the particular audience</b> (previous page – FBO/MHI/OV should already be familiar from recruitment letter, and hopefully employees will have seen the flyer)</p> <p><i>E.g. We are trying to find out:</i></p> <p><i>What it's like to work in an SH</i></p> <p><i>How people get on in SHs</i></p> <p><i>What makes following/implementing rules around food safety/animal welfare harder or easier</i></p> <p>Our role as researchers is to gather the views of all of the different people working in slaughterhouses (managers, employees and FSA staff). We are not looking for any particular answers; all of your opinions are valid, there are no right or wrong answers.</p> <p>In accordance with Market Research Society Code of Conduct, and the rules for Government Social Research, <b>participation</b> in this interview is <b>voluntary</b> and you can refuse to answer any individual question or to <b>withdraw</b> from the interview at any time.</p> <p>We will treat all information that you give in confidence. We will not be reporting any of your individual responses during this discussion and the FSA will not be able to associate your name or details with your responses in this interview. IF NECESSARY: although some FSA staff may know that this SH has taken part in the research.</p> <p>Can I please have your <b>permission to record</b> this interview? We will use the recording for <b>analysis purposes only</b> (i.e. the recording will not be passed on to the FSA). We may include quotes from your answers in our report, although where will <b>not</b> do so in a way that will allow you to be <b>identified</b>. If at any point you would like a response to not be recorded, please let me know and I will stop recording.</p>	<p>Welcome: orientates participant, informs them of the researchers role gets them prepared to take part in the interview. Outlines the 'rules' of the interview</p> <p>IF NECESSARY provide reassurances re: reporting of any behaviours that could be considered unethical/against FSA rules etc (do not use these words) – nothing is to be reported about individuals/individual SHs</p> <p>NOTE: These background questions are important as they not only provide context but also give an indication of the areas that will be most important to concentrate/pr</p>

	<p>We will be using the answers that you and other interviewees give us to prepare a <b>written report</b> for the FSA which will be published in late 2012. In it, we will talk about what we found in all of the SHs, not about any one SH in particular. The information you give us will only be used for this research project and not for any other purposes. Recordings and notes will be deleted once the project is complete (September 2012).</p> <p><b><u>Background</u></b>  <b>I'd like to start by learning a bit about you and how you work.</b></p> <p><b>Can I start by asking you to introduce yourself? Please tell me your job title, and a bit about your current job, your previous experience, any relevant qualifications you have or formal training you have undertaken, and the best thing / worst thing about your job.</b></p> <p>(If not covered) How long have you held your current position? How long have you worked at this SH? How long have you worked in SH regulation/the meat industry? IF HAS HAD PREVIOUS ROLES: Can you tell me a little bit about your previous jobs (either different ones in this SH or in other SHs/elsewhere in the food industry) and what you learned by doing them that you apply in your current job?</p> <p><b>Do you see yourself working in SHs in five years? If not, why not?</b></p>	<p>obe on with this particular interviewee</p>
<p>5 mins B1, B2</p>	<p><b><u>2. Work environment</u></b></p> <p><b>Can you tell me a little bit about how this SH operates? What does a typical day look like? Are there any times when it is more or less busy? Why?</b></p> <p><b>How successful do you think this SH is? Why?</b></p> <p><b>How would you describe the general atmosphere in the SH?</b></p> <ul style="list-style-type: none"> <li>• How management/staff get on</li> <li>• How officials get on</li> <li>• How officials get on with management / staff</li> <li>• Pressures within the SH (external and internal)</li> </ul> <p>What helps / hinders the general atmosphere?</p> <p><b>How would you describe the compliance procedures that are in place in this SH? What works</b></p>	<p>Allows participant to begin to discuss the particularities of the SH in which they work, how it operates, how compliance is treated.</p>

	well? What works less well? Are there any specific times/parts of the SH process when it works well or less well? (NB refer back to any 'pressure points' in more detailed questioning later)	
10 mins A3, B5, B6	<p><b><u>3. Risk and regulatory regime</u></b></p> <p><b>What would you describe as the key threats to food safety in SHs? And the key threats to animal welfare?</b></p> <p>Use stimulus of journey of animal from lairage to chiller and ask respondent to talk you through where and how the key risks arise.</p> <p><i>Keep a note for use in the next section. (STIMULUS 1 – lairage to chiller map)</i></p> <p><b>How well do you think that these key hazard points are managed in this SH?</b> When are they well-managed? And when less well? Why do you say that? NB PROBE on the effect of time pressure on the management of hazards/threats/risk</p> <p><b>What do you understand by a “risk-based and proportionate” approach to regulation?</b> Is this a useful way of talking about regulation in this environment? Is this understanding that you have shared by the FBO? By staff? Where and why do they differ? What effect does this have? How (if at all) does this inform your work?</p> <p><b>In your view, how well does the current regulatory regime work in relation to safeguarding public health?</b></p> <p>What helps / hinders the regulation of slaughterhouses in this regard?</p> <p><b>And how well does the current regulatory regime work in relation to safeguarding the welfare of animals at slaughter?</b></p> <p>What helps / hinders the regulation of slaughterhouses in this regard?</p> <p>What does the health mark mean? Is it important? Why? For whom?</p>	Explores participants own attitudes towards risk and the management of food hazards, as well as their views of the current regulatory regime.
10 mins A1a, A5-A7	<p><b><u>4. Roles and Responsibilities</u></b></p> <p>I'd like to talk to you about your role and responsibilities: <b>Can you talk me through an average day? And week?</b> <i>Explore in detail all of the tasks carried out – create a mini diary with participant (STIMULUS 2 – diary).</i> What do you spend most of your time doing?</p>	Explores participants understanding of their own role and the role of others

	<p>What do you not spend enough time doing?  <i>Moderator note: If at this point it is appropriate, talk through the day book with the OV and ask them to talk you through an average week, and one that was a bit unusual.</i>          Using diary:  <b>Are any of these tasks easier/more difficult to carry out?</b> What makes them so?  <b>Which of these tasks are most important in ensuring food safety? And animal welfare?</b> And which so you think are less important? For what reasons?  <b>Thinking back to the key hazard points we identified earlier in the discussion. We have already spoken about you responsibilities in relation to these hazards – who else has responsibility for helping to control them?</b> Where and when? <i>Note roles and responsibilities on STIMULUS 1</i></p>	<p>in the SH with relation to food safety, and how well they and others carry out their roles.</p> <p>RESEARCHER NOTE: Try to get to the bottom of the reasons for viewing certain tasks as more or less important - because that's their job? Because it poses risks to public health? Both? Or something else?</p>
10 mins A4-A5, C4-C5	<p><b><u>5. Relationships and communications</u></b>  <i>Moderator note: If there are several people who could fit the description of FBO, please find out who the OV and MHIs consider to be the FBO and work out who they are referring to when answering these questions.</i>  <i>If necessary, ask: <b>Who is the FBO in this plant?</b></i>  <i>If OVs/MHIs have worked in other SHs in the past, it may be useful to probe as necessary around the differences between there and this SH/how typical they think the current SH is.</i>  <b>How would you describe your relationship with:</b>          a) The FBO          b) the MHI/OV          c) Plant employees (<i>if large SH may need to ask about specific types of employees</i>)</p> <p>Using diary (STIMULUS 2): <b>Thinking about a typical day/week, who do you usually work with or have contact with?</b> For what reasons/on what tasks? <i>Note on diary</i>  <b>How often do you see the FBO</b> (use name or appropriate terminology)? Do you have regular contact?</p>	<p>Allow participants to describe their interactions with others in the SH, how they communicate, and how that could be improved.</p>

	<p>Or only when there are issues/concerns? How do you two communicate? <i>Ask for examples</i></p> <p><b>How would you describe the FBO's attitude towards you?</b> How does he/she react when you discuss standards and compliance with him/her? When you give him/her advice? Take informal action? Formal enforcement action? <i>Ask for examples</i></p> <p><b>How often do you have contact with FBO employees?</b> Which ones? At which point in the SH process? <i>Ask for examples</i></p> <p><b>How would you describe the attitude of FBO employees towards you?</b> And towards other officials? How do they react when you intervene? e.g. discussion of standards and compliance, offering advice, formal enforcement action.</p> <p><b><u>For OV</u></b></p> <p><b>How do you work with the MHI(s)?</b> Do you work directly with them or instruct them through the FBO? If this depends, on what? Which of these two ways of working do you think is the ideal? Why? <i>Ask for examples</i></p> <p><b>How would you describe their approach to regulation?</b> Does this differ from yours in any way? Why do you say that? <i>Ask for examples</i> Does that have an effect on how you carry out your job? Or on your relationship with them?</p> <p><b>How to you approach taking regulatory decisions that involve the MHI(s)?</b> <i>Ask for examples</i></p> <p><b><u>For MHI</u></b></p> <p><b>How do you work with the OV?</b> Can you describe your interactions? <i>Ask for examples</i></p> <p><b>How would you describe their approach to regulation?</b> Does this differ from yours in any way? Why do you say that? <i>Ask for examples</i> Does that have an effect on how you carry out your job? Or on your relationship with them?</p> <p><b>How would you describe your ideal relationship with...?</b></p> <ul style="list-style-type: none"> <li>• MHI/OV</li> <li>• FBO</li> <li>• Staff</li> </ul> <p>How could your current relationships with MHI/OV/FBO/Staff improve?</p>	
10 mins B4a-B6	<p><b><u>6. Approach to regulation</u></b></p> <p><b>If not already covered: What would a fully compliant slaughterhouse look like? (if necessary:</b></p>	Explores attitudes towards compliance

	<p>compliant with food safety and animal welfare regulations)</p> <p><b>I'd like to talk to you about your <i>personal approach</i> to regulation:</b></p> <p><b>What do you do if you think standards are slipping? How do you decide whether or not to intervene?</b> <i>Probe on trigger points. Probe for examples</i></p> <p><b>How do you decide what intervention to pursue when there are lapses in compliance?</b> What informs this decision? <i>Probe for examples</i></p> <p><b>Is consistency important?</b> Why/Why not? If so: How do you try to ensure consistency in your approach to regulatory practice? How easy or difficult is this? Why? <i>Probe for examples</i></p> <p><b>What differences do you see between the challenges of achieving compliance and the problems of sustaining it?</b> Which is the more common or important problem? Do you have different approaches to these challenges? <i>Probe for examples</i></p> <p><i>Moderator note: If possible at this stage, it could be useful to ask the OV to talk you through the enforcement log. Can be useful to talk around specific incidents/ interventions.</i></p> <p><b>Can you describe two examples where the decisions taken by you effectively achieved AND sustained (PROBE SEPARATELY) compliance within the SH?</b> For each, please could you explain:</p> <ul style="list-style-type: none"> <li>• Reason for action</li> <li>• Your approach to regulatory practice (e.g. informal vs. formal)</li> <li>• Interventions or enforcement used and why</li> <li>• Your role (e.g. educator vs enforcer vs consultant – is it easy to have this dual role? Why?</li> <li>• Attitude of FBO/staff</li> <li>• Impact on behaviour/ SH practice / compliance</li> <li>• Fit with policy and standard procedure</li> </ul> <p><b>What do you think worked?</b> Why? Who do you think was responsible?</p> <p><b>Was the improved compliance sustained?</b> If so, how so? If not, why not? How did you monitor this?</p> <p><b>Could you give me an example when things didn't</b></p>	<p>and how the actions they take to try to ensure compliance in the SH, and views on how well this works.</p>
--	--	---

	<p><b>work so well? PROBE USING THE LIST ABOVE</b></p> <p><b>What didn't work? Why? Who do you think was responsible?</b></p> <p><b>Overall, how well do you think that this SH complies with official controls? Where does it do this well? And where not so well? Why is that? How far is that because of the way you handle it yourself, or for other reasons?</b> If discusses own role in compliance, PROBE ON</p> <ul style="list-style-type: none"> <li>• Range of approaches</li> <li>• Nature of the approach (formal / informal)</li> <li>• Range of interventions involved</li> <li>• Examples of its success</li> </ul> <p><b>What would it take for this SH to improve compliance? Do you think that it is important that this happens?</b></p> <p>IF NOT COVERED IN PREVIOUS SECTION:  <b>Do you think that your approach to regulation differs in any way from that of other FSA staff in the SH?</b>  How so? If so, does this make regulation of this SH easier or more difficult?</p>	
5-10 mins B7	<p><b><u>7. Future Regulation</u></b></p> <p><b>What would have to change to help you to make <i>your approach</i> more effective? Why is this?</b></p> <p><b>What would have to change in the future to make regulation of food safety SHs more effective overall? What would have to change in the future to make regulation of animal welfare SHs more effective overall?</b></p> <p><b>Using STIMULUS 3 (FSA 'prompts document'):</b></p> <p><b>Looking at the pathway of food from farm to retail, and thinking about how you think food safety regulation could work better in the future:</b></p> <p><b>Where should controls be placed? Why?</b></p> <p><b>Who should carry those out? (FBO/Officials: OV/MHI) Why?</b></p> <p><b>Why would this be preferable to the current system of controls? Would others (FBO/other officials) welcome this? Why or why not?</b></p> <p><b>Would it affect this business? How? Would it affect the wider meat industry?</b></p>	Discusses respondents views of how regulation of SHs could be changed in the future and the risks and challenges presented by any change to the current regulatory regime. Also discusses how best audits could be carried out.



	<p><b>How would it impact on the inspection process?</b> How would it impact on food safety risks? How would it impact on animal welfare risks?</p> <p><b>Can you envisage any new problems emerging?</b> How could these be avoided?</p> <p><u>Audits:</u></p> <p><b>How would audits be carried out under such a system of controls?</b></p> <p><b>What would be the purpose of auditing in such a system?</b></p> <p><b>What should be audited?</b> Where should they be carried out? Who should carry those out?</p> <p><b>For MHIs:</b></p> <p><b>How would you feel about being more involved in some of the tasks on this card? How would you feel about being responsible for them?</b></p> <p>SHOWCARD:</p> <p>Carrying out ante mortem inspections</p> <p>Carrying out audits of plants</p> <p>Having overall responsibility for enforcing official meat controls</p>	
5 mins	<p><b><u>8. Conclusions</u></b></p> <p>We're going to spend some time in the next couple of days watching the slaughterhouse process, so we can see for ourselves the sort of things people have talked to us about and get a better picture of how it all works. We're not checking up on individuals, and we won't report anything that can be traced back to particular people or teams.</p> <p><b>What do you expect we will find? Why?</b> What should we be looking for?</p> <p>Is there anything in particular you think we should ask the OV/MHI/FBO/staff during our interviews with them to help us better understand regulation and compliance in this SH?</p> <p><b>Is there anything else you would like to add?</b></p> <p>Thank and close, remind that we will be doing short follow-up interviews tomorrow</p> <p><b>FOR MHIs:</b> recontact question</p> <p>This study is being funded by the Food Standards Agency (FSA), a central government department. The</p>	<p>Key messages</p> <p>Draws interview to a close.</p>

	<p>FSA, or a research organisation acting on their behalf, may wish to re-contact you in the next 12 months to ask any further questions about the research or invite you to take part in future research on this subject. There would be no obligation for you to take part. Would you be willing for your contact details (name, plant address and telephone number) to be passed to FSA, or a research organisation acting on their behalf, so they can contact you for further research? This information will be used for research purposes only.</p>	
--	--	--

FSA – Slaughterhouse Social Science Research Project  
**Case study visits - FBO- Discussion Guide – DEPTH INTERVIEWS**

**Objectives:**

*NB this section is for researcher benefit to remind them of the key objectives of the research as agreed with the FSA. When outlining the research to respondents please explain it in simple, everyday language (see intro section).*

The key purpose of the research is to understand how the regulation of slaughterhouses works in practice: how official controls are delivered and the environment in which this happens. Key research questions for the project overall are:

- Develop an understanding of **current behavioural and social influences in slaughterhouses** and **their impact on processes and structures** (and vice versa) and **consequently the implications for how official controls are delivered**.
- Explore in detail **what encourages or discourages duty holders and employees to take responsibility** for food safety, in the context of the wider influences which exist in the workplace environment.
- Understand **how OV/MIs approach enforcement** and how they decide what approach to adopt.

Please see the detailed research questions grid for specific research questions of relevance to this discussion guide (questions are referred to in second column on the left):

Guide Sections	Research Questions	Purpose	Guide Timings
<b>1. Introductions</b>		Sets the scene, reassures participants about the interview.	3 mins
<b>2. Background and Business/Work environment</b>	A2 B2	Discuss the career history and biography of the participant which provides useful background. Allows participant to begin to discuss the particularities of their SH, how it operates and its place in the meat industry.	5-10 mins
<b>3. Attitudes towards risk and regulation of risk</b>	A3, B4a, B4b, B5, B6	Explores participants own attitudes towards risk and the management of food hazards, as well as their views of the current regulatory regime.	10-15 mins
<b>4. Handling of risk (roles and</b>	A4 A5 B4b, C4,	Asks FBO to describe how they perceive risk in their SH, the steps they	15 mins

responsibility)	C5	take to minimise it, and how they see the roles of their staff and officials contributing to this.	
<b>5. Relationships and their effect on compliance</b>	B5, B6, C4, C5	Explores attitudes and behaviours towards officials and staff in the context of compliance. Talks through their responses to regulatory intervention.	10 mins
<b>6. Future Regulation</b>	A7, B7	Discusses respondents' views of strengths and weaknesses of current regulatory regime in light of current challenges and emerging risks. Explore potential improvements to current regulatory regime and implications. Also discusses how best audits could be carried out.	10 mins
<b>7. Conclusions</b>		Identifies key messages and sums up.	2 mins

### Using this guide

The following is a guide for the flow of discussions. It is not a script or questionnaire and interviewers may not ask all questions during every interview, or follow the exact order. We aim to cover all of the following material across the sample as a whole. However, the amount and depth of coverage typically varies according to the individuals interviewed.

We use several conventions to explain to you how this guide will be used. These are described below:

Timings & Research Questions	Questions	Notes and Prompts
5 mins A2	<p><b><u>Underlined</u> = Title:</b> This provides a heading for a sub-section</p> <p><b>Bold = Question:</b> Questions that will be asked of the participant if relevant using appropriate language (which may not be the same as the language in the guide). Not all questions are asked during fieldwork based on the researcher's view of progress, the respondents' answers and time pressures.</p> <ul style="list-style-type: none"> <li><b>Bullet = prompt:</b> Prompts are not questions – they are there to provide guidance to the researcher if required.</li> </ul>	This area is used to summarise what we are discussing, and, where necessary, provides informative notes for the researcher

How long it takes & the specific research questions that this section focuses on	Typically, the researcher will ask <b>questions</b> and use prompts to guide where necessary. Not all questions or prompts will necessarily be used in an interview. Where individuals are willing, the timetable allows and the material justifies interviews, will be extended, and conversely, other, less productive interviews may be slightly shorter than outlined below.	
--	--	--

### Key points to bear in mind:

FBO/MHI/OV: Where these are referred to, please use the name of the person or their title within that particular slaughterhouse i.e. 'How often do you have contact with the FBO' might be 'How often do you have contact with John/Mr. Doe/the owner/the technical manager.

Food safety/animal welfare: Where pressed for time, please be aware that the FSA is particularly interested in the views of respondents on food safety, thus probe on this rather than on animal welfare if necessary to cover all the topics.

Time pressures: Issues around time pressures on those working in SHs are seen to be particularly important by the client. If these are mentioned by respondents, please follow up in as much depth as possible. In addition, try to arrange any observations to coincide with these times, if at all possible.

Risk/hazard/threat: We are interested in the language that respondents use to describe risk within SHs – please note the language that they use and reflect it back, substituting the language in the guide.

Timing	Key Questions	Notes
5 mins A2	<p>My name is X from Ipsos MORI, the independent research agency. We are speaking with you today as part of research we are carrying out on behalf of (the social science research unit at) the Food Standards Agency looking at how people in slaughterhouses keep us all eating safe food. <b>Thank you very much for agreeing to be interviewed.</b> The conversation should take around an hour/half an hour.</p> <p><b>Outline research aims in appropriate everyday language for the particular audience</b> (previous page – FBO/MHI/OV should already be familiar from recruitment letter, and hopefully employees will have seen the flyer)</p> <p><i>E.g. We are trying to find out:</i></p> <p><i>What it's like to work in an SH</i></p> <p><i>How people get on in SHs</i></p> <p><i>What makes following/implementing rules around food safety/animal welfare harder or easier</i></p> <p>Our role as researchers is to gather the views of all of the different people working in slaughterhouses (managers, employees and FSA staff). We are not looking for any particular answers; all of your opinions are valid, there are no right or wrong answers.</p> <p>In accordance with Market Research Society Code of Conduct, and the rules for Government Social Research, <b>participation</b> in this interview is <b>voluntary</b> and you can refuse to answer any individual question or to <b>withdraw</b> from the interview at any time.</p> <p>We will treat all information that you give in confidence. We will not be reporting any of your individual responses during this discussion and the FSA will not be able to associate your name or details with your responses in this interview. IF NECESSARY: although some FSA staff may know that this SH has taken part in the research.</p> <p>Can I please have your <b>permission to record</b> this interview? We will use the recording for <b>analysis purposes only</b> (i.e. the recording will not be passed on to the FSA). We may include quotes from your answers in our report, although where we will <b>not</b> do so in a way that will allow you to be <b>identified</b>. If at any point you would like a response to not be recorded, please let me know and I will stop recording.</p> <p>We will be using the answers that you and other</p>	<p>Welcome: orientates participant, informs them of the researchers role gets them prepared to take part in the interview.</p> <p>Outlines the 'rules' of the interview</p> <p>IF NECESSAR Y provide reassurance s re: reporting of any behaviours that could be considered unethical/ag ainst FSA rules etc (do not use these words) – nothing is to be reported about individuals/in dividual SHs</p>

	<p>interviewees give us to prepare a <b>written report</b> for the FSA which will be published in late 2012. In it, we will talk about what we found in all of the SHs, not about any one SH in particular. The information you give us will only be used for this research project and not for any other purposes. Recordings and notes will be deleted once the project is complete (September 2012).</p>	
<p>5-10 mins A2 B2</p>	<p><b><u>Background and Business/Work environment</u></b></p> <p><b>I'd like to start by learning a bit about you and how you work.</b></p> <p><i>Moderator note: we have found in some family-run slaughterhouses (e.g. medium –sized slaughterhouses) some of the FBO responsibilities are shared out. If there is more than one person 'in charge', please ask who does what, who has responsibility for what and if possible, interview them all. In larger slaughterhouses roles may be more clearly defined. As such use appropriate questioning as necessary.</i></p> <p><b>Please tell me your job title and a bit about what your job entails day to day, your previous experience, any relevant qualification you have or formal training you have undertaken, and the best thing / worst thing about managing/owning this SH.? OR What is your job within the SH? Can you tell me about what you do day to day, your previous experience, any relevant qualification you have or formal training you have undertaken, and the best thing / worst thing about managing/owning this SH.</b></p> <p>(If not covered) How long have you held your current position / done this job? How long have you worked at /owned this SH? How long have you worked in SHs/the meat industry? IF HAS HAD PREVIOUS JOBS (either in this SH or in other SHs/other parts of the food industry): Can you tell me a little bit about your previous jobs and what you learned by doing them that you apply in your current job?</p> <p><b>Can you tell me a little bit about how this SH operates? What does a typical day/week look like?</b> Are there any times when it is more or less busy? Why? Does it sometimes get very pressured? Why? When? How often? What effect does this have on the business?</p> <p><b>Where does this SH supply meat to? Can you describe your relationship with the people you sell your meat to? How does this affect how you operate?</b></p>	<p>Discuss the career history and biography of the participant which provides useful background. Allows participant to begin to discuss the particularities of their SH, how it operates and its place in the meat industry.</p>

	<p><b>Where does the SH source the animals it slaughters?</b> Can you describe your relationship with the people you buy your animals from? How does this affect how you operate?</p> <p><b>Can you tell me a little bit about the workforce in the SH?</b></p> <ul style="list-style-type: none"> <li>• Number</li> <li>• Experience</li> <li>• Turnover</li> <li>• Backgrounds</li> <li>• Management structure</li> </ul> <p><b>What would you say is the most important factor in the success of the SH?</b></p> <p><b><i>Moderator note: WE HAVE FOUND IN EARLIER VISITS THAT RESPONDENTS SEEM TO TALK ABOUT HAVING A “QUALITY” PRODUCT. BEFORE MOVING ON IT IS VITAL THAT YOU REALLY UNDERSTAND WHAT IS MEANT BY “QUALITY”.</i></b></p> <p><b>IF NEEDED:</b></p> <p><b>Can I just check what you mean by quality of product?</b> All for spontaneous response before making use of probes: <i>unblemished, right colour, right texture, right smell, right weight, non-visible risk. Please explore in detail respondent language.</i></p> <p><b>And what is the biggest challenge that you have in managing/owning this SH?</b></p> <p><b>Do you see yourself working in SHs in five years? If not, why not?</b></p> <p><b>How would you describe the general atmosphere in the SH?</b></p> <ul style="list-style-type: none"> <li>• How management/staff get on</li> <li>• How official get on</li> <li>• How officials get on with management / staff</li> <li>• Pressures within the SH (external and internal)</li> </ul>	
10-15 mins A3, B4a, B4b, B5, B6	<p><b><u>Attitudes towards risk and regulation of risk</u></b></p> <p><b>Thinking about how your SH works, what would you say is key in delivering a good end product?</b></p> <p><b>IF NOT ASKED: What do you think of when I say good end / quality product? Why do you say that? What affect, if any, does quality have on ensuring</b></p>	Explores participants own attitudes towards risk and the management of food hazards, as



	<p><b>that meat is safe to eat? Why do you say that?</b></p> <p><i>Moderator note: we are interested in hearing any comment on invisible risk and effect on practise / procedure</i></p> <p><i>Moderator note: the below is background information in case respondents talk about invisible risks (i.e. pathogens). FSA RESEARCH IDENTIFIED AROUND TWO-THIRDS OF SAMPLED POULTRY CONTAINED CAMPYLOBACTER. IT IS THE MOST COMMON CAUSE OF FOOD POISONING IN THE UK AND EVIDENCE INDICATES THAT CHICKEN IS THE MAJOR SOURCE OF THESE BACTERIA IN PEOPLE'S KITCHENS.</i></p> <p><b>When I say “food safety” what do you think of? Anything else? Why do you say that?</b></p> <p><b>What is important in ensuring food safety in the SH? i.e. ensuring meat is safe to eat? What makes you say that? Probe: non-visible risk i.e. pathogen.</b></p> <p><b>What is important in ensuring animal welfare in the SH? What makes you say that?</b></p> <p><b>Use</b> STIMULUS 1 of journey of animal from lairage to chiller and ask respondent to talk you through these, thinking about food safety and animal welfare. <i>Keep a note for use in the next section. (STIMULUS 1 – lairage to chiller map)</i></p> <p><b>How do you know that these things are important?</b> Where do you go when you need information and advice?</p> <ul style="list-style-type: none"> <li>• Experience</li> <li>• Training</li> <li>• Advice from officials (verbal/written)</li> <li>• Advice from industry bodies</li> </ul> <p>If not explored yet:</p> <p><b>How much information and advice do you get from the officials who work in your SH? And through other official channels? Probe what is discussed and how things are said. Is this useful or unhelpful?</b></p> <p><b>How do you try to ensure that the staff in the SH have a shared understanding of food safety? And animal welfare?</b></p> <ul style="list-style-type: none"> <li>• Advice from officials</li> <li>• Experience</li> <li>• Supervision</li> </ul>	<p>well as their views of the current regulatory regime.</p>
--	--	--

	<ul style="list-style-type: none"> <li>• Communications</li> <li>• Training</li> <li>• Internal auditing</li> </ul> <p>If not explored yet:</p> <p><b>How does advice from officials affect your understanding of how to ensure food safety? And animal welfare?</b> It is useful or unhelpful?</p> <p><b>What do you understand by a “risk-based and proportionate” approach to regulation in SHs?</b> Is this a useful way of talking about regulation slaughterhouses? Is this understanding shared by the officials in this SH? Where and why do they differ?</p> <p><i>NB looking at attitudes now, will explore specific incidents later in the interview</i></p> <p><b>In your view, how well does the current regulatory regime work in relation to safeguarding public health and the health and welfare of animals at slaughter?</b> What helps / hinders the regulation of slaughterhouses?</p> <p><b>What do you think the OV is in the SH to do?</b></p> <p><b>What do you think MHI(s) are in the SH to do?</b></p> <p><b>What does the health mark mean?</b> Is it important? Why? For whom?</p> <p><b>How does the current regulatory regime impact on how you manage this SH?</b> Can you give me some examples?</p> <p><b>How easy or difficult do you find it to comply with official controls?</b> PROBE around finding out about the regulations, cost, and paperwork.</p>	
15 mins A4 A5 B4b, C4, C5	<p><b><u>Handling of risk (roles and responsibility)</u></b></p> <p><i>Moderator note: It may suffice to use the stimulus and ask FBOs to talk through who does what and where, probing on why, what training people receive and if there are any checks in place to make sure they carry out their tasks.</i></p> <p><b>Can you please take me through the procedures (lairage to chiller) that are in place for ensuring food safety and animal welfare, and who is responsible for ensuring that these procedures are followed?</b> How do you decide who should be responsible? How important, if at all, is that procedure? Why?</p>	Explores participants understanding of their own role and the role of others in the SH with relation to food safety, and how well they and others carry out their roles.

	<p><i>Use notes on STIMULUS 1. If interviewee mentions HACCP please probe on how effective they think this is as a means to managing risks in the SH. Use respondents' own language.</i></p> <p><b>Which of these procedures are most important in ensuring food safety? And animal welfare? And which so you think are less important?</b></p> <p>NB: DOUBLE CHECK UNDERSTANDING OF FOOD SAFETY BEFORE PROBING ON AFFECT THAT HAS ON WHAT PEOPLE DO.</p> <p><b>Is it important that everyone working in the SH has a shared understanding of how to ensure that animal welfare is protected/the food that you produce is safe?</b></p> <p>Does everyone have a shared understanding? If not, why not? If so, how do you ensure that those responsible have a shared understanding of these hazards? NB: WE ARE INTERESTED IN WHETHER THEY UNDERSTAND THERE MAY BE THINGS IN MEAT THAT THEY CANT SEE OR SMELL (I.E. PATHOGEN) BUT COULD MAKE YOU ILL.</p> <p>And knowledge of how to manage them?</p> <ul style="list-style-type: none"> <li>• Experience</li> <li>• Supervision</li> <li>• Communications</li> <li>• Training</li> <li>• Internal auditing</li> <li>• Advice from officials</li> </ul> <p>If not explored yet:</p> <p><b>What role do the officials play in helping you to decide what procedures you put into place?</b> <i>(ask separately for OV and MHI)</i> Do you ever seek advice from them? Do they ever offer advice? <i>PROBE for examples.</i></p> <p><b>How do you keep track of whether the procedures you have in place are being followed? Who does this?</b> Can you give me some examples? <i>If necessary, go through each hazard point on STIMULUS 1. SPEND A LOT OF TIME ON THIS IN LARGER SLAUGHTERHOUSES</i></p> <ul style="list-style-type: none"> <li>• Documentation</li> <li>• Line management</li> <li>• Spot checks</li> <li>• Internal/external audits</li> </ul> <p><b>Are there any points in the slaughter process/times</b></p>	
--	---	--

	<p><b>of the day/week/year where it is easier to manage hazards/risks than others?</b> And any where it is more difficult? <i>PROBE</i> for examples.</p> <p>Refer back to the information from Section 1 about times when it gets pressured in the SH and PROBE around this.</p>	
10 mins B5, B6, C4, C5	<p><b><u>Relationships and their effect on compliance</u></b></p> <p><i>Moderator note: It may be useful to probe around previous OVs/MHIs who used to work in the slaughterhouse and the sorts of relationships the FBO had with them (may help to disentangle the relative importance of attitudes of FBO and regulators and the FBO and regulators' approach to their job)</i></p> <p><b>How would you describe your relationship with:</b></p> <p><b>d) the MHI/OV</b></p> <p><b>e) Plant employees</b> (if large SH may need to ask about specific types of employees)</p> <p><i>Explore in detail all of the tasks carried out – create a mini diary with participant (STIMULUS 2 – diary).</i></p> <p><b>Thinking about a typical day/week, who do you usually work with or have contact with?</b> For what reasons/on what tasks? <i>Note on diary</i></p> <p><i>Ask all questions separately for OV and MHI – relationships may be very different so it is important that each are addressed separately:</i></p> <p><b>How often do you see the OV/MHI? Do you have regular contact with him? Or only when there are issues/concerns? How do you two communicate? What do you talk about?</b></p> <p><b>How would you describe the OV/MHIs attitude towards you? And their attitudes towards the staff in the SH? Do you feel that the relationship that you have is a good or a bad one?</b> If relevant: Does this differ in any way from other officials who have worked in the SH. Which approach did you prefer? Why?</p> <p><b>How would you describe their approach to ensuring compliance?</b></p> <ul style="list-style-type: none"> <li>• Fair / pragmatic / risk-averse / too soft / too harsh</li> <li>• Role (educate/enforce)</li> <li>• Attitude (pro-active / reactive)</li> <li>• Understanding of the meat industry</li> <li>• Consistent</li> </ul> <p><b>What's the difference between an OV and an MHI?</b></p>	<p>Explores attitudes and behaviours towards officials and staff in the context of compliance. Talks through their responses to regulatory intervention.</p>

	<p><b>What makes a good OV/MHI?</b>  <b>What makes a bad one?</b></p> <p><i>Moderator note: If possible at this stage, it could be useful to ask the FBO to talk you through the enforcement log. Can be useful to talk around specific incidents/ interventions.</i></p> <p><b>Can you tell me about the last time the OV/MHI came to talk to you about an issue? What happened?</b></p> <p><b>Can you describe a time when an intervention by one of the officials helped you to comply with food safety/animal welfare regulations?</b></p> <p><b>What do you think worked? Why? Who do you think was responsible? Did you make any changes to your compliance procedures as a result?</b></p> <p><b>Could you give me an example when an intervention didn't work so well? What didn't work? Why? Who do you think was responsible?</b></p> <p><b>Overall, how effective do you think the officials' approach is at helping you to <u>achieve and sustain</u> compliance?</b></p> <ul style="list-style-type: none"> <li>• Range of approaches</li> <li>• Nature of the approach (formal / informal)</li> <li>• Range of interventions involved</li> <li>• Examples of its success</li> </ul> <p><b>How would you describe your ideal relationship with the OV? And the MHI?</b>  <b>How could your current relationships with these be improved?</b></p>	
10 mins A7, B7	<p><b><u>Future Regulation</u></b></p> <p><i><u>Moderator note: it is important to get beyond initial attitudes which may centre around wanting to remove regulators from slaughterhouses. Probe around how would animal welfare and food safety be ensured if things were to change. Who would take ownership of these roles? Who would be responsible?</u></i></p> <p><b>Thinking about how risk and compliance is managed in your SH, and how that is regulated, what would have to change to help you to make your approach more effective? Why is this?</b></p> <ul style="list-style-type: none"> <li>• Changes to regulations (different/fewer/more)</li> <li>• Changes to inspections tasks (different/fewer/more)</li> </ul>	<p>Allows respondents to outline their views on how regulation could be improved.</p> <p><i>MODERATOR NOTE NB please steer conversation away from the topic of</i></p>

	<ul style="list-style-type: none"> <li>• Changes to who carries out the inspections</li> <li>• Earned recognition / co-regulation / third party accreditation schemes</li> </ul> <p><b>Using STIMULUS 3 (FSA ‘prompts document’):</b></p> <p><b>Looking at the pathway of food from farm to despatch, and thinking about how you think food safety regulation could work better in the future:</b></p> <p><b>Where should controls be placed? Why?</b></p> <p><b>Who should carry those out? (FBO/Officials: OV/MHI) Why?</b></p> <p><b>Why would this be preferable to the current system of controls?</b> Would others (FBO/other officials) welcome this? Why or why not?</p> <p><b>Would it affect this business?</b> How? Would it affect the wider meat industry?</p> <p><b>How would it impact on the inspection process?</b> How would it impact on food safety risks? How would it impact on animal welfare risks?</p> <p><b>Can you envisage any new problems emerging?</b> How could these be avoided?</p> <p><u>Audits:</u></p> <p><b>How would audits be carried out under such a system of controls?</b></p> <p><b>What would be the purpose of auditing in such a system?</b></p> <p><b>What should be audited?</b> Where should they be carried out? Who should carry those out?</p>	<p><i>charging. See interviewer briefing notes for advice on how to this.</i></p>
5 mins	<p><b><u>Sum-up and close</u></b></p> <p>We’re going to spend some time in the next couple of days watching the slaughterhouse process, so we can see for ourselves the sort of things people have talked to us about and get a better picture of how it all works. We’re not checking up on individuals, and we won’t report anything that can be traced back to particular people or teams.</p> <p>Is there anything in particular you think we should observe or ask the OV/MHI/ staff during our interviews with them to help us better understand regulation and compliance in this SH? <b>Is there anything else you would like to add?</b></p> <p>Thank and close, remind that we will also be doing short</p>	<p>Key messages</p> <p>Draws interview to a close.</p>

	<p>follow-up interviews tomorrow</p> <p><b>Recontact question</b></p> <p>This study is being funded by the Food Standards Agency (FSA), a central government department. The FSA, or a research organisation acting on their behalf, may wish to re-contact you in the next 12 months to ask any further questions about the research or invite you to take part in future research on this subject. There would be no obligation for you to take part. Would you be willing for your contact details (name, plant address and telephone number) to be passed to FSA, or a research organisation acting on their behalf, so they can contact you for further research? This information will be used for research purposes only.</p>	
--	--	--

FSA – Slaughterhouse Social Science Research Project  
**Case study visits – FBO employee - Discussion Guide – DEPTH**  
**INTERVIEWS**

**Objectives:**

*NB this section is for researcher benefit to remind them of the key objectives of the research as agreed with the FSA. When outlining the research to respondents please explain it in simple, everyday language (see intro section).*

The key purpose of the research is to understand how the regulation of slaughterhouses works in practice: how official controls are delivered and the environment in which this happens. Key research questions for the project overall are:

- Develop an understanding of **current behavioural and social influences in slaughterhouses** and **their impact on processes and structures** (and vice versa) and **consequently the implications for how official controls are delivered**.
- Explore in detail **what encourages or discourages duty holders and employees to take responsibility** for food safety, in the context of the wider influences which exist in the workplace environment.
- Understand **how OV/MIs approach enforcement** and how they decide what approach to adopt.

Please see the detailed research questions grid for specific research questions of relevance to this discussion guide (questions are referred to in second column on the left):

Guide Sections	Research Questions	Purpose	Guide Timings
<b>1. Introductions and background</b>	A2	Sets the scene, reassures participants about the interview. Discuss the career history and biography of the participant which provides useful background.	3 mins
<b>2. Work environment</b>	B2	Allows participant to begin to discuss the particularities of their SH and how they feel about working there.	5 mins
<b>3. Roles and responsibilities</b>	A1c, A3-A5, B4a	Explores participants daily tasks, their perceptions of their own role in managing risk (and by extension their attitudes towards risk), how they see this role in relation to that of others.	8 mins
<b>4. Relationships</b>	B5-B6, C4-C5	Explores attitudes and behaviours towards officials and superiors in the	8 mins



<b>and their effect on compliance</b>		context of compliance. Talks through their responses to regulatory intervention.	
<b>5. Future Regulation</b>	B7	Allows respondents to outline their views on how regulation could be improved.	3 mins
<b>6. Conclusions</b>		Identifies key messages and sums up.	2 mins

### Using this guide

The following is a guide for the flow of discussions. It is not a script or questionnaire and interviewers may not ask all questions during every interview, or follow the exact order. We aim to cover all of the following material across the sample as a whole. However, the amount and depth of coverage typically varies according to the individuals interviewed.

We use several conventions to explain to you how this guide will be used. These are described below:

<b>Timings &amp; Research Questions</b>	<b>Questions</b>	<b>Notes and Prompts</b>
5 mins A2	<p><b><u>Underlined</u> = Title:</b> This provides a heading for a sub-section</p> <p><b>Bold = Question or read out statement:</b> Questions that will be asked to the participant if relevant. Not all questions are asked during fieldwork based on the researcher's view of progress.</p> <ul style="list-style-type: none"> <li>- Bullet = prompt: Prompts are not questions – they are there to provide guidance to the researcher if required.</li> </ul>	This area is used to summarise what we are discussing, and, where necessary, provides informative notes for the researcher
How long it takes & the specific research questions that this section focuses on	Typically, the researcher will ask <b>questions</b> and use prompts to guide where necessary. Not all questions or prompts will necessarily be used in an interview	

### Key points to bear in mind:

FBO/MHI/OV: Where these are referred to, please use the name of the person or their title within that particular slaughterhouse i.e. 'How often do you have contact with the FBO' might be 'How often do you have contact with John/Mr. Doe/the owner/the technical manager.

Food safety/animal welfare: Where pressed for time, please be aware that the FSA is particularly interested in the views of respondents on food safety, thus probe on this rather than on animal welfare if necessary to cover all the topics. Time pressures: Issues around time pressures on those working in SHs are seen to be particularly important by the client. If these are mentioned by respondents, please follow up in as much depth as possible. In addition, try to arrange any observations to coincide with these times, if at all possible.

Risk/hazard/threat: We are interested in the language that respondents use to describe risk within SHs – please note the language that they use and reflect it back, substituting the language in the guide.

Timing	Key Questions	Notes
5 mins A2	<p>My name is X from Ipsos MORI, the independent research agency. We are speaking with you today as part of research we are carrying out on behalf of (the social science research unit at) the Food Standards Agency looking at how people in slaughterhouses keep us all eating safe food. <b>Thank you very much for agreeing to be interviewed.</b> The conversation should take around an hour/half an hour.</p> <p><b>Outline research aims in appropriate everyday language for the particular audience</b> (previous page – FBO/MHI/OV should already be familiar from recruitment letter, and hopefully employees will have seen the flyer)</p> <p><i>E.g. We are trying to find out:</i></p> <p><i>What it's like to work in an SH</i></p> <p><i>How people get on in SHs</i></p> <p><i>What makes following/implementing rules around food safety/animal welfare harder or easier</i></p> <p>Our role as researchers is to gather the views of all of the different people working in slaughterhouses (managers, employees and FSA staff). We are not looking for any particular answers; all of your opinions are valid, there are no right or wrong answers.</p> <p>In accordance with Market Research Society Code of Conduct, and the rules for Government Social Research, <b>participation</b> in this interview is <b>voluntary</b> and you can refuse to answer any individual question or to <b>withdraw</b> from the interview at any time.</p> <p>We will treat all information that you give in confidence. We will not be reporting any of your individual responses during this discussion and the FSA will not be able to associate your name or details with your responses in this interview. IF NECESSARY: although some FSA staff may know that this SH has taken part in the research.</p> <p>Can I please have your <b>permission to record</b> this interview? We will use the recording for <b>analysis purposes only</b> (i.e. the recording will not be passed on to the FSA). We may include quotes from your answers in our report, although where we will <b>not</b> do so in a way that will allow you to be <b>identified</b>. If at any point you would like a response to not be recorded, please let me know and I will stop recording.</p>	<p>Welcome: orientates participant, informs them of the researchers role gets them prepared to take part in the interview.</p> <p>Outlines the 'rules' of the interview</p>

	<p>We will be using the answers that you and other interviewees give us to prepare a <b>written report</b> for the FSA which will be published in late 2012. In it, we will talk about what we found in all of the SHs, not about any one SH in particular. The information you give us will only be used for this research project and not for any other purposes. Recordings and notes will be deleted once the project is complete (September 2012).</p> <p><b><u>Welcome and introduction</u></b></p> <p><b>I'd like to start by learning a bit about you:</b></p> <p><i>Moderator note: we have found in some family-run slaughterhouses (e.g. medium-sized slaughterhouses) some of the FBO employee roles are shared. If there is more than one role per employee, please try to work out who does what, who has responsibility for what and if possible, interview them all. In larger slaughterhouses roles may be more clearly defined. As such use appropriate questioning as necessary.</i></p> <p><b>What is your job within the SH? Can you tell me about what you do day to day, your previous experience, any relevant qualification you have or formal training you have undertaken, and the best thing / worst thing about working in this SH.</b></p> <p><b><i>In larger slaughterhouses...</i></b></p> <p><b>Please tell me your job title and a bit about what your job entails day to day, your previous experience, any relevant qualification you have or formal training you have undertaken, and the best thing / worst thing about working in this SH?</b></p> <p>(If not covered) How long have you held your current position / done this job? How long have you worked at this SH? How long have you worked in SHs/the meat industry? Do you have any qualifications related to your current job?</p> <p>Have you done any formal training for it/while working here? IF HAS HAD PREVIOUS JOBS in SHs: Can you tell me a little bit about your previous jobs and what you learned by doing them that you apply in your current job?</p> <p><b>Do you see yourself working in SHs in five years? If not, why not?</b></p>	
5 mins	<b><u>Work environment</u></b>	Allows participant to

B2	<p><b>I'd like to talk a bit about how you work.</b></p> <p><b>How would you describe working in this SH?</b> What's the best/worst thing about it? E.g. nature of the work, pressure. <b>What's it like working here?</b> <i>Ask for examples</i></p> <ul style="list-style-type: none"> <li>• Nature of the work</li> <li>• How management/staff get on</li> <li>• How officials get on with management / staff</li> </ul> <p>If has previously worked in other SHs:</p> <p>How is this SH different from the one you used to work in? What is different about it? Which do you prefer working in? Why is that?</p> <p><b>Can you talk me through an average day? And week?</b> What kind of hours and shift patterns do you work? What's your workload like? What do you spend most of your time doing? Is there a set pattern to the work you do every day or is each day different? What makes your day go well? And what makes it more difficult?</p> <p><i>Explore in detail all of the tasks carried out – if necessary create a mini diary with participant (STIMULUS 2 – diary).</i></p> <p><b>Do you ever get periods of very heavy work pressure when it's hard to cope with everything that's coming through?</b> If so, how often does this happen? Is this regular? Why does it happen, what does it depend on? How often? What happens then? How do your management react? How does this affect the way that you do your work?</p> <p><i>NB note these times and refer back to them when exploring food safety/animal welfare and compliance</i></p>	<p>begin to discuss the particularities of their SH and how they feel about working there.</p>
8 mins A1c, A3- A5, B4a	<p><b><u>Role and responsibilities</u></b></p> <p><b>Thinking about all the things you do as part of your job, which do you think are the most important? And least?</b> Why is that? Which do your managers think are the most/least important? And the MHLs? And the OVs?</p> <p><b>Thinking about all the tasks you do as part of your job, are any of them important in ensuring animal welfare? And ensuring food safety?</b> How so? Why do you say this?</p> <p><b>When I say “food safety” what do you think of? Anything else? Why do you say that?</b></p> <p><i>Moderator note: FSA RESEARCH IDENTIFIED AROUND TWO-THIRDS OF SAMPLED POULTRY CONTAINED CAMPYLOBACTER. IT IS THE MOST COMMON CAUSE OF FOOD POISONING IN THE UK AND EVIDENCE INDICATES THAT CHICKEN IS THE MAJOR SOURCE</i></p>	<p>Explores participants daily tasks, their perceptions of their own role in managing risk (and by extension their attitudes towards risk), how they see this role in relation to that of</p>

<p>OF THESE BACTERIA IN PEOPLE'S KITCHENS.</p> <p><i>Moderator note: we are interested in hearing any comment on non-visible risk (i.e. pathogens) and effect on practise / procedure</i></p> <p><i>Moderator note: WE HAVE FOUND IN EARLIER VISITS THAT RESPONDENTS SEEM TO TALK ABOUT HAVING A "QUALITY" PRODUCT. BEFORE MOVING ON IT IS VITAL THAT YOU REALLY UNDERSTAND WHAT IS MEANT BY "QUALITY".</i></p> <p><b>IF NEEDED:</b></p> <p><b>Can I just check what you mean by quality of product?</b> <i>Allow for spontaneous response before making use of probes: <b>unblemished, right colour, right texture, right smell, right weight, non-visible risk.</b> Please explore in detail respondent language.</i></p> <p><b>What affect, if any, does quality have on ensuring that meat is safe to eat? Why do you say that?</b></p> <p><b>Are there any specific things that you have to follow to ensure food safety? Probe: practise / procedures that help to control non-visible risk (campylobacter / salmonella/ e-coli / listeria)</b></p> <p><b>And animal welfare?</b> <i>Can you please talk me through these? PROBE for where/when/regularity/who instructs them to do it</i></p> <p><b>How important is that you always carry these out?</b> <i>Which are more important? And less so?</i></p> <p><b>What happens if you don't carry them out?</b> <i>To you? To others?</i></p> <p><i>PROBE understanding of consequences for:</i></p> <ul style="list-style-type: none"> <li>• Self</li> <li>• Line managers/FBO</li> <li>• SH</li> <li>• Animals</li> <li>• The public</li> <li>• To officials (OV/MHI)</li> </ul> <p><b>How did you learn about these and how to carry them out?</b> <i>Do you think that you fully understand them?</i></p> <ul style="list-style-type: none"> <li>• Training</li> <li>• On the job</li> <li>• Communications from FBO/supervisor/official</li> </ul> <p><b>How do you know if what you are doing is 'right'?</b> <i>Explore interpretation of what 'right' means. Who</i></p>	<p>others.</p>
---	----------------

	<p><b>would you go to if you had a question?</b></p> <p><b>Does anyone make sure that you do these things?</b> If so, who? How do they do that? Are there times when they are more or less likely to do so? Would anyone notice if you didn't carry them out? <b>Are there times when it is easier to carry these out? And harder?</b> Can you give me some examples?</p> <ul style="list-style-type: none"> <li>• When under time pressure (<i>refer back to description of the pressures in the SH mentioned in first section and PROBE</i>)</li> <li>• Conflicting messages from FBO/supervisor/official</li> <li>• Others on the line not carrying them out</li> </ul>	
8 mins B5- B6, C4- C5	<p><b><u>Relationships and their effects on compliance</u></b></p> <p><i>Moderator note: It may be useful to probe around OVs/MHIs who previously worked in the slaughterhouse and the sorts of relationships the employees had with them (may help to disentangle the relative importance of attitudes of employees and regulators and the employees and regulators' approach to their job)</i></p> <p>How would you describe your relationship with:</p> <ul style="list-style-type: none"> <li>f) The FBO</li> <li>g) the MHI/OV</li> <li>h) Other plant employees (<i>if large SH may need to ask about specific types of employees, or ask about supervisors separately</i>)</li> </ul> <p><b>Thinking about a typical day/week, who do you usually work with or have contact with as part of your job?</b> For what reasons/on what tasks? <i>Note on diary</i> <i>Ask separately for OV and MHI, as appropriate given previous answers/where works on the line:</i></p> <p><b>How often do you see the OV/MHI?</b> Do you have regular contact with him or her? Or only when there are issues/concerns? <i>Ask for examples</i></p> <p><b>What do you think they are in the SH to do?</b> Do you think that they do it well or badly?</p> <p><b>Do you ever ask him/her for advice? Does he/she ever offer you advice?</b></p> <p><b>How would you describe the OV/MHIs attitude towards you and the other staff?</b> How do you feel around them?</p> <p><b>What do you think they are in the SH to do?</b></p> <p><b>What do you think the health mark means?</b> Is it important? Why? For whom?</p> <p><b>How would you describe their approach to their job?</b></p> <ul style="list-style-type: none"> <li>• Fair / pragmatic / risk-averse / too soft /too harsh</li> <li>• Role (educate/enforce)</li> </ul>	<p>Explores attitudes and behaviours towards officials and superiors in the context of compliance. Talks through their responses to regulatory intervention.</p>

	<ul style="list-style-type: none"> <li>• Attitude (pro-active / reactive)</li> <li>• Understanding of the meat industry</li> <li>• Consistent</li> </ul> <p><b>Do they ever give you direct instructions?</b> Can you give me some examples? <i>Probe what is discussed and how things are said.</i> What was the result in each case? Do they ever chip in to help you on any tasks? Which ones? IF YES: Would other OV/MHIs you have come across do this? Why do you think that is?</p> <p><b>Are there ever any times when officials and your manager/supervisor ask you to carry things out differently?</b> <i>Ask for examples</i> When does this happen? (at what parts of the process/in relation to which tasks) Can you talk me through what happens then – how do you decide whose instructions to follow?</p> <p><b>When did you last talk to the OV? Can you tell me what happened?</b></p> <p><b>When did you last talk to the MHI? Can you tell me what happened?</b></p> <p><b>Can you describe a time when an action by one of the officials helped you to carry out the animal welfare/food safety procedures we talked about earlier? What do you think worked? Why? Who do you think was responsible?</b></p> <p><b>Could you give me an example when things didn't work so well? What didn't work? Why? Who do you think was responsible?</b></p> <p><b>Who do you get on better with: the OV or the MHI?</b> Why do you say that? Does it matter? Why?</p>	
3 mins B7	<p><b><u>Future Regulation</u></b></p> <p><b>What would have to change to make it easier for you to</b> <i>(Moderator note – insert the food safety / animal welfare tasks they carry out)? (e.g. What would make it easier for you to carry out your daily temperature checks?)</i></p> <p><b>PROBE:</b></p> <ul style="list-style-type: none"> <li>• Training</li> <li>• Procedures</li> <li>• Facilities</li> <li>• Working practices</li> <li>• Attitude of managers/FBO</li> <li>• Relationship with officials</li> </ul> <p>Why do you say that? How would it work in practice? Can</p>	Allows respondents to outline their views on how regulation could be improved.



	<p>you give me an example?</p> <p><b>How would you feel about being more involved in some of the tasks on this card?</b></p> <p>SHOWCARD:</p> <ul style="list-style-type: none"> <li>• Screening live animals</li> <li>• Spotting abnormal behaviours or sick animals</li> <li>• Identifying and tagging abnormal carcasses for further inspection by officials?</li> </ul> <p>How would you feel about being responsible for these tasks? Why do you say that?</p>	
3 mins	<p><b><u>Sum-up and close</u></b></p> <p>We're going to spend some time in the next couple of days watching the slaughterhouse process, so we can see for ourselves the sort of things people have talked to us about and get a better picture of how it all works. We're not checking up on individuals, and we won't report anything that can be traced back to particular people or teams.</p> <p><b>Is there anything else you would like to add?</b></p> <p>Thank and close, remind that we will also be doing short follow-up interviews with some people tomorrow, and having informal chats after we've done some observations.</p>	<p>Key messages</p> <p>Draws interview to a close.</p>

FSA – Slaughterhouse Social Science Research Project

**Case study visits – FBO employee (PIA) - Discussion Guide – DEPTH**

**INTERVIEWS**

**Objectives:**

*NB this section is for researcher benefit to remind them of the key objectives of the research as agreed with the FSA. When outlining the research to respondents please explain it in simple, everyday language (see intro section).*

The key purpose of the research is to understand how the regulation of slaughterhouses works in practice: how official controls are delivered and the environment in which this happens. Key research questions for the project overall are:

- Develop an understanding of **current behavioural and social influences in slaughterhouses** and **their impact on processes and structures** (and vice versa) and **consequently the implications for how official controls are delivered**.
- Explore in detail **what encourages or discourages duty holders and employees to take responsibility** for food safety, in the context of the wider influences which exist in the workplace environment.
- Understand **how OV/MIs approach enforcement** and how they decide what approach to adopt.

Please see the detailed research questions grid for specific research questions of relevance to this discussion guide (questions are referred to in second column on the left):

Guide Sections	Research Questions	Purpose	Guide Timings
<b>1. Introductions and background</b>	A2	Sets the scene, reassures participants about the interview. Discuss the career history and biography of the participant which provides useful background.	3 mins
<b>2. Work environment</b>	B2	Allows participant to begin to discuss the particularities of their SH and how they feel about working there.	5 mins
<b>3. Roles and responsibilities</b>	A1c, A3-A5, B4a	Explores participants daily tasks, their perceptions of their own role in managing risk (and by extension their attitudes towards risk), how they see this role in relation to that of others.	8 mins
<b>4.</b>	B5-B6, C4-	Explores attitudes and behaviours	8 mins

<b>Relationships and their effect on compliance</b>	C5	towards officials and superiors in the context of compliance. Talks through their responses to regulatory intervention.	
<b>5. Future Regulation</b>	B7	Allows respondents to outline their views on how regulation could be improved.	3 mins
<b>6. Conclusions</b>		Identifies key messages and sums up.	2 mins

## Using this guide

The following is a guide for the flow of discussions. It is not a script or questionnaire and interviewers may not ask all questions during every interview, or follow the exact order. We aim to cover all of the following material across the sample as a whole. However, the amount and depth of coverage typically varies according to the individuals interviewed.

We use several conventions to explain to you how this guide will be used. These are described below:

<b>Timings &amp; Research Questions</b>	<b>Questions</b>	<b>Notes and Prompts</b>
5 mins A2	<p><b><u>Underlined</u> = Title:</b> This provides a heading for a sub-section</p> <p><b>Bold = Question or read out statement:</b> Questions that will be asked to the participant if relevant. Not all questions are asked during fieldwork based on the researcher's view of progress.</p> <ul style="list-style-type: none"> <li>- Bullet = prompt: Prompts are not questions – they are there to provide guidance to the researcher if required.</li> </ul>	This area is used to summarise what we are discussing, and, where necessary, provides informative notes for the researcher
How long it takes & the specific research questions that this section focuses on	Typically, the researcher will ask <b>questions</b> and use prompts to guide where necessary. Not all questions or prompts will necessarily be used in an interview	

## Key points to bear in mind:

FBO/MHI/OV: Where these are referred to, please use the name of the person or their title within that particular slaughterhouse i.e. 'How often do you have contact

with the FBO' might be 'How often do you have contact with John/Mr. Doe/the owner/the technical manager.

Food safety/animal welfare: Where pressed for time, please be aware that the FSA is particularly interested in the views of respondents on food safety, thus probe on this rather than on animal welfare if necessary to cover all the topics. Time pressures: Issues around time pressures on those working in SHs are seen to be particularly important by the client. If these are mentioned by respondents, please follow up in as much depth as possible. In addition, try to arrange any observations to coincide with these times, if at all possible.

Risk/hazard/threat: We are interested in the language that respondents use to describe risk within SHs – please note the language that they use and reflect it back, substituting the language in the guide.

### **Moderator note:**

The PIA role is an unusual one, in that they are carrying out inspections tasks (as an MHI would in a red meat SH), but directly employed by the FBO. We want to work out

- Whether they worked on the line before becoming a PIA
- How they learned about the inspection process
- How they feel about the responsibility of carrying out food safety inspections
- How (or whether) they try to carry out inspections in an independent manner
- Whether they ever feel that there are any conflicts of interest.

Timing	Key Questions	Notes
5 mins A2	<p>My name is X from Ipsos MORI, the independent research agency. We are speaking with you today as part of research we are carrying out on behalf of (the social science research unit at) the Food Standards Agency looking at how people in slaughterhouses keep us all eating safe food. <b>Thank you very much for agreeing to be interviewed.</b> The conversation should take around an hour/half an hour.</p> <p><b><i>Outline research aims in appropriate everyday language for the particular audience</i></b> (previous page – FBO/MHI/OV should already be familiar from recruitment letter, and hopefully employees will have seen the flyer)</p> <p><i>E.g. We are trying to find out:</i></p> <p><i>What it's like to work in an SH</i></p> <p><i>How people get on in SHs</i></p> <p><i>What makes following/implementing rules around food</i></p>	<p>Welcome: orientates participant, informs them of the researchers role gets them prepared to take part in the interview.</p> <p>Outlines the 'rules' of the interview</p>

	<p><i>safety/animal welfare harder or easier</i></p> <p>Our role as researchers is to gather the views of all of the different people working in slaughterhouses (managers, employees and FSA staff). We are not looking for any particular answers; all of your opinions are valid, there are no right or wrong answers.</p> <p>In accordance with Market Research Society Code of Conduct, and the rules for Government Social Research, <b>participation</b> in this interview is <b>voluntary</b> and you can refuse to answer any individual question or to <b>withdraw</b> from the interview at any time.</p> <p>We will treat all information that you give in confidence. We will not be reporting any of your individual responses during this discussion and the FSA will not be able to associate your name or details with your responses in this interview. IF NECESSARY: although some FSA staff may know that this SH has taken part in the research.</p> <p>Can I please have your <b>permission to record</b> this interview? We will use the recording for <b>analysis purposes only</b> (i.e. the recording will not be passed on to the FSA). We may include quotes from your answers in our report, although where will <b>not</b> do so in a way that will allow you to be <b>identified</b>. If at any point you would like a response to not be recorded, please let me know and I will stop recording.</p> <p>We will be using the answers that you and other interviewees give us to prepare a <b>written report</b> for the FSA which will be published in late 2012. In it, we will talk about what we found in all of the SHs, not about any one SH in particular. The information you give us will only be used for this research project and not for any other purposes. Recordings and notes will be deleted once the project is complete (September 2012).</p> <p>Welcome and introduction</p> <p><b>I'd like to start by learning a bit about you:</b></p> <p><i>Moderator note: we have found in some family-run slaughterhouses (e.g. medium-sized slaughterhouses) some of the FBO employee roles are shared. If there is more than one role per employee, please try to work out who does what, who has responsibility for what and if possible, interview them all. In larger slaughterhouses roles may be more clearly defined. As such use appropriate questioning as necessary.</i></p> <p><b>What is your job within the SH? Can you tell me about what you do day to day, your previous experience, any relevant</b></p>	
--	---	--

	<p><b>qualification you have or formal training you have undertaken, and the best thing / worst thing about managing/owning this SH.</b></p> <p><b><i>In larger slaughterhouses...</i></b></p> <p><b>Please tell me your job title and a bit about what your job entails day to day, your previous experience, any relevant qualification you have or formal training you have undertaken, and the best thing / worst thing about managing/owning this SH?</b></p> <p>(If not covered) How long have you held your current position / done this job? How long have you worked at this SH? How long have you worked in SHs/the meat industry? Do you have any qualifications related to your current job?</p> <p>Have you done any formal training for it/while working here? IF HAS HAD PREVIOUS JOBS in SHs: Can you tell me a little bit about your previous jobs and what you learned by doing them that you apply in your current job?</p> <p><b>Do you see yourself working in SHs in five years? If not, why not?</b></p>	
5 mins B2	<p><b><u>Work environment</u></b></p> <p><b>I'd like to talk a bit about how you work.</b></p> <p><b>How would you describe working in this SH?</b> What's the best/worst thing about it? E.g. nature of the work, pressure.</p> <p><b>What's it like working here? Ask for examples</b></p> <ul style="list-style-type: none"> <li>• Nature of the work</li> <li>• How management/staff get on</li> <li>• How officials get on with management / staff</li> </ul> <p>If has previously worked in other SHs:</p> <p>How is this SH different from the one you used to work in? What is different about it? Which do you prefer working in? Why is that?</p> <p><b>Can you talk me through an average day? And week?</b> What kind of hours and shift patterns do you work? What's your workload like? What do you spend most of your time doing? Is there a set pattern to the work you do every day or is each day different? What makes your day go well? And what makes it more difficult?</p> <p><i>Explore in detail all of the tasks carried out – if necessary create a mini diary with participant (STIMULUS 2 – diary).</i></p> <p><b>Do you ever get periods of very heavy work pressure when it's hard to cope with everything that's coming through?</b> If so, how often does this happen? Is this regular? Why does it happen, what does it depend on? How often? What happens</p>	Allows participant to begin to discuss the particularities of their SH and how they feel about working there.

	<p>then? How do your management react? How does this affect the way that you do your work?  <i>NB note these times and refer back to them when exploring food safety/animal welfare and compliance</i></p>	
<p>8 mins  A1c,  A3-A5,  B4a</p>	<p><b><u>Role and responsibilities</u></b></p> <p><b>Thinking about all the things you do as part of your job, which do you think are the most important? And least?</b>  Why is that? Which do your managers think are the most/least important? And the MHIs? And the OV's?</p> <p><b>Thinking about all the tasks you do as part of your job, are any of them important in ensuring animal welfare? And ensuring food safety? How so? Why do you say this?</b></p> <p><b>When I say "food safety" what do you think of? Anything else? Why do you say that?</b></p> <p><i>Moderator note: FSA RESEARCH IDENTIFIED AROUND TWO-THIRDS OF SAMPLED POULTRY CONTAINED CAMPYLOBACTER. IT IS THE MOST COMMON CAUSE OF FOOD POISONING IN THE UK AND EVIDENCE INDICATES THAT CHICKEN IS THE MAJOR SOURCE OF THESE BACTERIA IN PEOPLE'S KITCHENS.</i></p> <p><b><i>Moderator note: we are interested in hearing any comment on non-visible risk (i.e. pathogens) and effect on practise / procedure</i></b></p> <p><i>Moderator note: WE HAVE FOUND IN EARLIER VISITS THAT RESPONDENTS SEEM TO TALK ABOUT HAVING A "QUALITY" PRODUCT. BEFORE MOVING ON IT IS VITAL THAT YOU REALLY UNDERSTAND WHAT IS MEANT BY "QUALITY".</i></p> <p><b>IF NEEDED:</b></p> <p><b>Can I just check what you mean by quality of product?</b>  <i>Allow for spontaneous response before making use of probes:</i>  <b>unblemished, right colour, right texture, right smell, right weight, non-visible risk.</b> <i>Please explore in detail respondent language.</i></p> <p><b>What affect, if any, does quality have on ensuring meat is safe to eat? Why do you say that?</b></p> <p><b>Are there any specific things that you have to follow to ensure food safety?</b> <i>Probe: practise / procedure that help to control non-visible risks (campylobacter / salmonella/ e-coli / listeria)</i></p> <p><b>And animal welfare?</b> <i>Can you please talk me through these? PROBE for where/when/regularity/who instructs them to do it</i></p> <p><b>How important is that you always carry these out? Which</b></p>	<p>Explores participants daily tasks, their perceptions of their own role in managing risk (and by extension their attitudes towards risk), how they see this role in relation to that of others.</p>

	<p>are more important? And less so?</p> <p><b>What happens if you don't carry them out?</b> To you? To others?</p> <p><i>PROBE understanding of consequences for:</i></p> <ul style="list-style-type: none"> <li>• Self</li> <li>• Line managers/FBO</li> <li>• SH</li> <li>• Animals</li> <li>• The public</li> <li>• To officials (OV/MHI)</li> </ul> <p><b>How did you learn about these and how to carry them out?</b> Do you think that you fully understand them?</p> <ul style="list-style-type: none"> <li>• Training</li> <li>• On the job</li> <li>• Communications from FBO/supervisor/official</li> </ul> <p><b>How do you know if what you are doing is 'right'?</b> <i>Explore interpretation of what 'right' means. Who would you go to if you had a question?</i></p> <p><b>Does anyone make sure that you do these things?</b> If so, who? How do they do that? Are there times when they are more or less likely to do so? Would anyone notice if you didn't carry them out? <b>Are there times when it is easier to carry these out? And harder?</b> Can you give me some examples?</p> <ul style="list-style-type: none"> <li>• When under time pressure (<i>refer back to description of the pressures in the SH mentioned in first section and PROBE</i>)</li> <li>• Conflicting messages from FBO/supervisor/official</li> <li>• Others on the line not carrying them out</li> </ul>	
8 mins B5-B6, C4-C5	<p><b><u>Relationships and their effects on compliance</u></b></p> <p><i>Moderator note: It may be useful to probe around OVs/MHIs who previously worked in the slaughterhouse and the sorts of relationships the employees had with them (may help to disentangle the relative importance of attitudes of employees and regulators and the employees and regulators' approach to their job)</i></p> <p>How would you describe your relationship with:</p> <ul style="list-style-type: none"> <li>i) The FBO</li> <li>j) the MHI/OV</li> <li>k) Other plant employees (<i>if large SH may need to ask about specific types of employees, or ask about supervisors separately</i>)</li> </ul> <p><b>Thinking about a typical day/week, who do you usually work</b></p>	<p>Explores attitudes and behaviours towards officials and superiors in the context of compliance. Talks through their responses to regulatory intervention.</p>

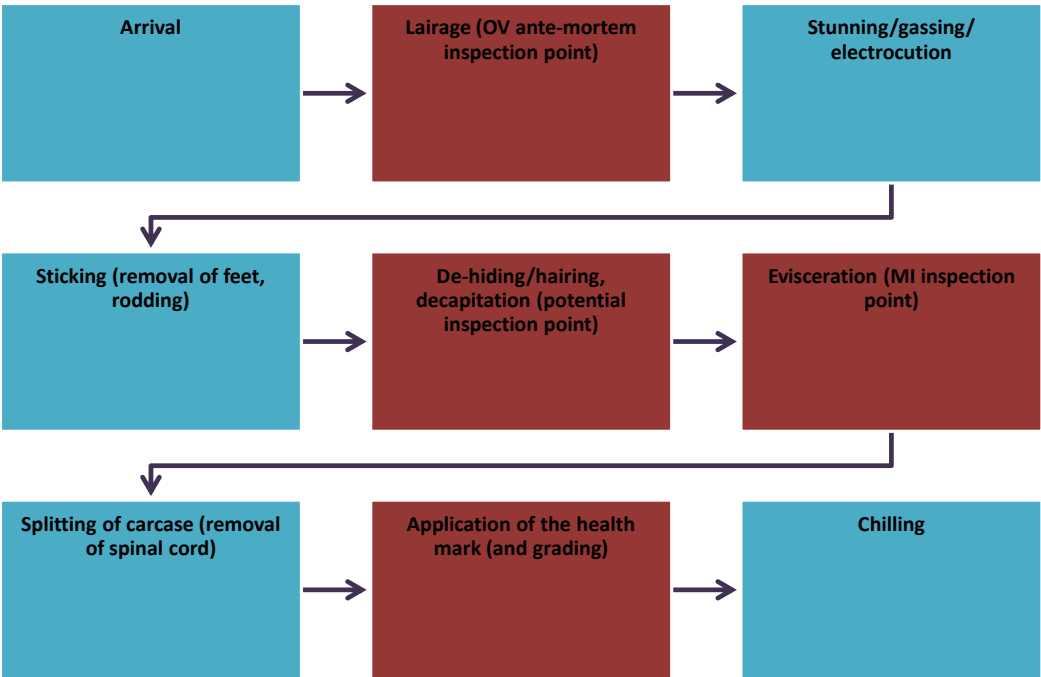


	<p><b>with or have contact with as part of your job?</b> For what reasons/on what tasks? <i>Note on diary</i>  <i>Ask separately for OV and MHI, as appropriate given previous answers/where works on the line:</i></p> <p><b>How often do you see the OV/MHI?</b> Do you have regular contact with him or her? Or only when there are issues/concerns? <i>Ask for examples</i></p> <p><b>What do you think they are in the SH to do?</b> Do you think that they do it well or badly?</p> <p><b>Do you ever ask him/her for advice? Does he/she ever offer you advice?</b></p> <p><b>How would you describe the OV/MHIs attitude towards you and the other staff?</b> How do you feel around them?</p> <p><b>What do you think they are in the SH to do?</b></p> <p><b>What do you think the health mark means?</b></p> <p><b>How would you describe their approach to their job?</b></p> <ul style="list-style-type: none"> <li>• Fair / pragmatic / risk-averse / too soft /too harsh</li> <li>• Role (educate/enforce)</li> <li>• Attitude (pro-active / reactive)</li> <li>• Understanding of the meat industry</li> <li>• Consistent</li> </ul> <p><b>Do they ever give you direct instructions?</b> Can you give me some examples? <i>Probe what is discussed and how things are said.</i> What was the result in each case? Do they ever chip in to help you on any tasks? Which ones? IF YES: Would other OV/MHIs you have come across do this? Why do you think that is?</p> <p><b>Are there ever any times when officials and your manager/supervisor ask you to carry things out differently?</b> <i>Ask for examples</i> When does this happen? (at what parts of the process/in relation to which tasks) Can you talk me through what happens then – how do you decide whose instructions to follow?</p> <p><b>When did you last talk to the OV? Can you tell me what happened?</b></p> <p><b>When did you last talk to the MHI? Can you tell me what happened?</b></p> <p><b>Can you describe a time when an action by one of the officials helped you to carry out the animal welfare/food safety procedures we talked about earlier? What do you think worked? Why? Who do you think was responsible?</b></p> <p><b>Could you give me an example when things didn't work so well? What didn't work? Why? Who do you think was responsible?</b></p> <p><b>Who do you get on better with: the OV or the MHI? Why do</b></p>	
--	---	--

	you say that? Does it matter? Why?	
3 mins B7	<p><b><u>Future Regulation</u></b></p> <p><b>What would have to change to make it easier for you to (use the food safety / animal welfare tasks they carry out)?</b></p> <p><i>PROBE:</i></p> <ul style="list-style-type: none"> <li>• Training</li> <li>• Procedures</li> <li>• Facilities</li> <li>• Working practices</li> <li>• Attitude of managers/FBO</li> <li>• Relationship with officials</li> </ul> <p>Why do you say that? How would it work in practice? Can you give me an example?</p> <p><b>How would you feel about being more involved in some of the tasks on this card?</b></p> <p><i>SHOWCARD:</i></p> <ul style="list-style-type: none"> <li>• Screening live animals</li> <li>• Spotting abnormal behaviours or sick animals</li> <li>• Identifying and tagging abnormal carcasses for further inspection by officials?</li> </ul> <p>How would you feel about being responsible for these tasks? Why do you say that?</p>	Allows respondents to outline their views on how regulation could be improved.
3 mins	<p><b><u>Sum-up and close</u></b></p> <p>We're going to spend some time in the next couple of days watching the slaughterhouse process, so we can see for ourselves the sort of things people have talked to us about and get a better picture of how it all works. We're not checking up on individuals, and we won't report anything that can be traced back to particular people or teams.</p> <p><b>Is there anything else you would like to add?</b></p> <p>Thank and close, remind that we will also be doing short follow-up interviews with some people tomorrow, and having informal chats after we've done some observations.</p>	<p>Key messages</p> <p>Draws interview to a close.</p>

Case study visit stimulus

Slaughter process



Work diary

Use this to note patterns of work. Note times of day, and any particularly busy parts of the day/week/month

Weekly tasks

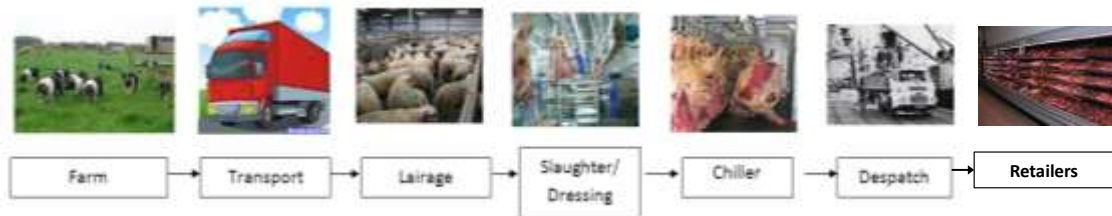
Monday
Tuesday
Wednesday
Thursday
Friday
Saturday
Sunday

Monthly tasks

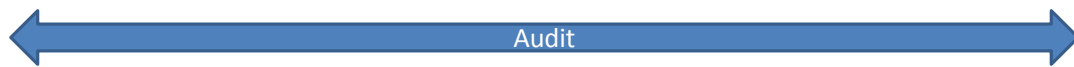
Week	Mon	Tue	Wed	Thu	Fri	Sat	Sun
1							
2							
3							
4							

## Future Regulation

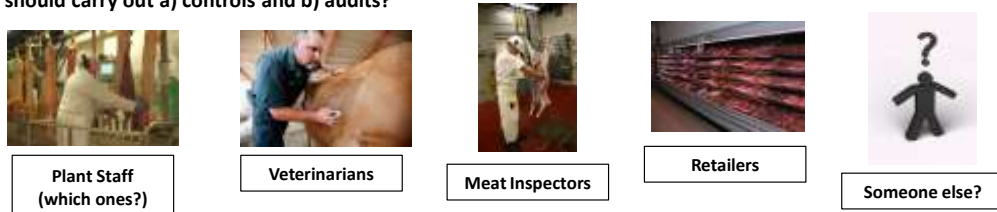
Where along the process should controls be placed?



And where should audits happen?



Who should carry out a) controls and b) audits?



## Showcard - Employees

- Screening live animals
- Spotting abnormal behaviours or sick animals
- Identifying and tagging abnormal carcasses for further inspection by officials?

## **Showcard – Meat Inspectors**

- Carrying out ante-mortem inspections
- Carrying out audits of plants
- Having overall responsibility for enforcing official meat controls?

## Observation guide

FSA – Slaughterhouse Social Science Research Project

### Case study visits – OBSERVATION GUIDE

#### **Objectives:**

The key purpose of the research is to understand how the regulation of slaughterhouses works in practice: how official controls are delivered and the environment in which this happens.

Please see the detailed research questions grid for specific research questions that researchers will be focussing on when carrying out observations:

#### **Using this guide**

This document serves as an observation ‘tool’ for researchers to use during site visits to SHs. Our focus during the visits is on observation and recording the details of the SH environment, and how that impacts on the delivery of official controls.

We are not taking photographs, but to ensure we capture as much detail as possible during the visit, it will help to imagine you are looking out for photo opportunities. We want this to be a record of everything that catches your attention.

The table overleaf outlines the key things to keep an eye out for during the visit. They are all things to keep in mind while you are observing and for probes during follow-up interviews. Some of this can be filled in retrospectively.

However, this guide is not exhaustive, and does not cover everything we expect to see. Researchers should note down any observations that will help us to answer the broad research objectives listed above.

Researchers should be especially vigilant in trying to observe the incidence and impact of any periods of very high work pressure (if any are observed – try to schedule observations for some of the busier times of the day). Try to note what triggered them; how they’re dealt with, how behaviour changes while its happening, its general effects, and what happens specifically to AW and FS compliance.

## **Slaughterhouse environment**

General impression of staff facilities, official offices. What are the immediately observable characteristics of the different areas i.e. arrival of the animals, in the lairage, ante mortem inspection, during processing (dressing / evisceration), post mortem inspection, in the chiller. NB WE ARE NOT QUALIFIED TO ASSESS REGULATORY/ SH PRACTICE, OBSERVING THESE AREAS WILL PROVIDE A GENERAL OVERVIEW OF ATMOSPHERE/SOCIAL CONTEXT

## **GENERAL OVERVIEW OF THE NATURE OF RELATIONSHIPS**

Slaughterhouse relationships

Overall how would you describe relationships in the slaughterhouse? How would you sum up the quantity and quality of interactions between different audiences?

## **Roles and responsibilities**

What specific tasks do the different audiences carry out? How much time do they spend doing them? What helps / hinders the carrying out of these roles (NB effect of time / workload pressure on how people carry out their role)? How seriously do they take their roles (as identified in interviews) Are roles and responsibilities clear? How (if at all) does this differ from the description of roles and responsibilities in the interviews? How is this dealt with?

**OV**

**MHI**



## **Roles and responsibilities**

What specific tasks do the different audiences carry out? How much time do they spend doing them? What helps / hinders the carrying out of these roles (NB effect of time / workload pressure on how people carry out their role)? How seriously do they take their roles (as identified in interviews) Are roles and responsibilities clear? How (if at all) does this differ from the description of roles and responsibilities in the interviews? How is this dealt with?

FBO employee (note separately for those carrying out different roles: technical /production manager, supervisor, skilled slaughterman, non-skilled slaughterman)

FBO (if more than one person note separately)

## **Behaviour and interactions**

What are the key behaviours of each of the audiences in relation to food safety? And animal welfare? What or who appears to influence how people behave in relation to food safety / animal welfare? Does high work pressure have an effect on behaviours around food safety and animal welfare? What or who encourages / inhibits these behaviours? Are food safety / animal welfare procedures (as outlined in interviews) followed? Are there any identifiable motivations / pressures to follow or not follow them? Who monitors the behaviour of employees in relation to food safety and animal welfare? How do they do this?

To what extent do the different audiences interact with each other? Why? Do employees interact more with FBO management, their own supervisors, OVs or MHIs, and how do these interactions vary?

If any intervention by officials are witnessed (e.g. advice, verbal warnings, stopping the line): What conditions / circumstances led to the intervention? What happens? What is discussed? What is recorded? What is the outcome? How does this conform to or differ from how the official/ FBO/ FBO employee described regulatory practice in the interview.

## **Communications**

To what extent do the different audiences communicate with each other? Why? Do employees communicate more with FBO management, their own supervisors, OV's or MHLs, and how do these communications vary?

How do the different audiences communicate with each other? How does this vary depending on situation?

What is the overall tone / language / body language / attitude adopted by each? What is being communicated?

Does the form and message change during the delivery of official controls? Is there a shared understanding of hazard/risk? To what extent do officials take a soft / tough approach? What issues arise (for either party)? Is there any disagreement, awkwardness? How is this handled?

### **OV – MI**

### **OV – FBO employee**

### **OV – FBO**

**MI – FBO**

**MI – FBO employee**

**FBO – FBO employee (separate out by type of employee if necessary)**