

Clare Haughey MSP
Convener of the Health, Social Care and Sport Committee
The Scottish Parliament
Edinburgh
EH99 1SP

3 April 2024

Dear Clare

Environment, Food and Rural Affairs Committee: Vet Shortages

Food Standards Scotland (FSS) was established in April 2015 under the Food (Scotland) Act 2015 as the new public sector food body for Scotland. We are a non-ministerial office of the Scottish Administration, independent from Scottish Government Ministers and from industry, and accountable to the Scottish Parliament, currently reporting to the Health, Social Care and Sport Committee.

Food Standards Scotland recently submitted written evidence to the House of Commons' Environment, Food and Rural Affairs Committee for its one-off evidence session on vet shortages across the UK.

Please find attached a copy of Food Standards Scotland's written evidence, which I hope yourself and other members of the Health, Social Care and Sport Committee will find of interest.

Food Standards Scotland is currently experiencing a major shortfall in our recruitment of Official Veterinarians, and the overall position in Scotland, and across the UK as a whole, regarding the availability of vets for public health work is increasingly very challenging. A number of concurrent issues, many arising as a consequence of EU exit, are having a significantly adverse impact upon vet recruitment in this area, including the private sector and other government bodies all competing for resources.

There is also a need to consider what long-term steps and measures should be taken within the education system to increase the recruitment of UK students into the veterinary profession.

Food Standards Scotland remains committed to protecting animal welfare and meat hygiene standards at all approved meat establishments in Scotland. However, the

ongoing recruitment challenges, RCVS registration requirements, combined with the effects of the UK Government's new immigration policy, and anticipated resource impacts from the introduction of a 35 hour week across Scottish Government, means this challenging situation has the potential to reach critical levels, in the absence of a sustainable pipeline of vet resource to support it. The impact on animal welfare, public health and trade is potentially devastating.

Please do not hesitate to contact me if you require more information, or would like to discuss this matter further.

Yours sincerely



Geoff Ogle
Chief Executive
Food Standards Scotland



**Inbhe
Bìdh Alba**

**Food Standards Scotland Evidence
House of Commons' Environment, Food and Rural Affairs Committee
Non-inquiry evidence session on Vet Shortages: 12 March 2024**

About Food Standards Scotland

Food Standards Scotland (“FSS”) was established on 1st April 2015 as the new public sector food body for Scotland, to protect the health and wellbeing of consumers in relation to issues around food and feed law, and standards. Our key priorities are public health and consumer protection, taking action to address preventable foodborne illnesses, helping to tackle food crime and providing advice which promotes a healthy diet. FSS is part of the Scottish Administration, but is independent of the Scottish Ministers and of industry, and is accountable to the Scottish Parliament, currently reporting to the Health, Social Care and Sport Committee.

Key Issues

FSS provides a range of services, largely statutory functions known as Official Controls (“OCs”), in approved meat establishments in Scotland, and employs Official Veterinarians (“OVs”) and Meat Hygiene Inspectors (“MHIs”) to deliver OCs across Scotland. We are currently experiencing a major shortfall in our recruitment of OVs, and the overall position in Scotland, and across the UK as a whole, regarding the availability of vets for public health work is increasingly very challenging. A number of concurrent issues, many arising as a consequence of EU exit, are having a significantly adverse impact upon vet recruitment in this area, including the private sector and other government bodies all competing for resources.

FSS remains committed to protecting animal welfare and meat hygiene standards at all approved meat establishments in Scotland. However, the ongoing recruitment challenges, RCVS registration requirements, combined with the effects of the UK Government’s new immigration policy, and anticipated resource impacts from the introduction of a 35 hour week across Scottish Government, means this challenging situation has the potential to reach critical levels, in the absence of a sustainable pipeline of vet resource to support it, with a potentially devastating impact on animal welfare, public health and trade.

Strategic context

FSS provides a range of services, largely statutory functions known as OCs, in approved meat establishments in Scotland. The majority of the services are charged to Food Business Operators (FBOs) with some paid for by Scottish Government and Other Government Departments such as the Veterinary Medicines Directorate (VMD). The Retained Regulation (EU) 2017/625, together with the Meat (Official Controls Charges) (Scotland) Regulations 2009 as amended, require that FBOs are charged for OCs which are discharged by FSS's MHIs and OV's. FSS regulates 94 sites of which the majority are red meat processors and producers.

Roughly a quarter (24%) of FSS's budget is spent on Operational Delivery (including feed). FSS brings in around £4.3m income (2023/4 figures) from regulatory activities via charges made to FBOs.

At any time, FSS has around thirty OV's and seventy MHIs present in meat premises across the country delivering OCs. FSS operates a fully employed model augmented with agency backfill as, and when, required. FSS currently has six OV FTE vacancies, which represents a 20% shortfall on our target deployment. The overall position regarding the availability of vets for public health work throughout the UK is increasingly very challenging, with a number of concurrent issues, many as a consequence of EU exit, contributing to the present situation including the private sector and other government bodies all competing for resources.

How are challenges around vet recruitment impacting upon FSS?

FSS has recently embarked on a recruitment campaign seeking five OV's to meet the minimum deployment requirements to deliver OCs in Scottish approved meat establishments. We have secured only one Trainee OV (who will likely not be deployable until spring-summer 2024). Some of the feedback we have received from prospective candidates includes:

- Immigration processes for applicants are costly and complex with limited support mechanisms available within civil service recruitment processes.
- Civil service on-boarding and security checks create significant delays, and candidates are lost due to slow processing.
- Entry salary for the civil service does not compete with the private sector, and "money in the bank" is key for an overseas candidate or graduate. Pension is of limited interest at start up.

The long turnaround time to onboard new recruits is also leading to candidates accepting positions elsewhere. FSS has operated an in-house OV delivery model since September 2019, with a noticeably positive effect on our staff retention levels (which increased from 30% to 90%), and on our people survey results. However, throughout 2023 we have increasingly had to backfill existing vacancies with temporary OV's supplied through the APHA veterinary agency framework, at a higher cost, in order to meet minimum deployment requirements.

FSS has operated a contingency plan which is designed to be used in times of acute staff shortage. Throughout 2023, this plan has been running on an almost continuous basis with staff working rest days and being deployed from other key delivery areas to ensure meat establishments in Scotland can continue to operate, and to maintain

supply chains. Management with suitable veterinary qualifications have also been diverted to frontline OV positions, which reduces management capacity and, in turn, limits important governance and development work of the management body.

The UK Government's new immigration policy will also significantly impact FSS's ability to attract and recruit prospective OVs from abroad. Early indications are that the impact could be significant as a result of changes to the shortage occupation list, to the minimum salary required for a visa and to the minimum income for those bringing family members to the UK on a family visa. This could also, if applicable, cause an adverse impact on FSS's charge rates to the meat industry.

A further layer of complexity restricting vet recruitment arises in the registering of competent and experienced vets for development into OVs. Within the UK a practising vet and OV must be registered with the RCVS. However, the RCVS restricts registration to graduates from specified veterinary universities. Furthermore, the RCVS requires the International English Language Testing System (IELTS) Level 7 English language, which is two levels above the Level 5 requirement for visa entry. The RCVS does run its own exam scheme for vets who do not come from recognised universities, but the exam which runs once per year is highly demanding with a 5% pass rate. Failed exams require a full retake (rather than failed module retakes), which delays recruitment by another year.

Actions taken by FSS

FSS has taken, or is currently taking, the following actions to retain and recruit OVs, and to mitigate the adverse impact of the challenges around vet recruitment on FSS's responsibilities:

- Undertaking recruitment campaigns, and partial backfill with agency resource where possible;
- Completely revamped the OV training programme, and developed a customised award, for independent assurance;
- Delivering an extra mural studies week for veterinary students, as and when requested by students across the UK;
- Continued provision of an annual £4,000 pay supplement for all FSS meat plant based OVs and non-plant based OVs who are deployed on a regular basis;
- Secured RCVS Temporary Registration to enable access for IELTS below Level 7, and utilised it for one OV;
- Launched new engagement plan with the Scottish Association of Meat Wholesalers (SAMW). This focuses on enhanced engagement at strategic, operational and technical levels, including the creation of a working group specifically to explore new ways of working and to identify new areas for operational efficiency;
- Regular engagement with relevant academic institutions, professional and other regulatory bodies and recruitment agencies to promote the role of an OV, and to attract prospective candidates to work within FSS; and
- Exploring options to directly engage with the current recruitment agency, and with other overseas agencies and providers to accelerate the supply of candidates for permanent OV recruitment.

Key actions to increase vet recruitment

FSS remain committed to protecting animal welfare and meat hygiene standards at all approved meat establishments in Scotland. However the ongoing recruitment challenges, RCVS registration requirements, combined with the UK Government's new immigration policy, and the anticipated resource impacts from the introduction of a 35 hour week across Scottish Government, means this situation has the potential to reach critical levels, if there is no sustainable pipeline of veterinary resource to support it, with the subsequent impact on animal welfare, public health and trade.

FSS considers that the following actions are necessary to develop a healthier veterinary recruitment pool within Scotland, with greater capacity and fitness for purpose:

- Simplify the immigration rules for vets' eligibility for skilled worker visas, and their entry into the civil service.
- Simplify, and flex, the RCVS registration process.
- Enable greater range and flexibility in the civil service remuneration package.

Actions necessary to support systemic change

FSS requests that the Environment, Food and Rural Affairs Committee makes the following recommendations to the UK Government:

1. The UK Government and Scottish Government to jointly host an UK-wide summit to consider the challenges around vet recruitment, and the actions necessary to significantly increase vet recruitment across the UK
2. The UK Government to introduce urgent changes to its new immigration policy in order to fast track overseas vets to work in Scotland
3. The UK Government to implement a review of the Veterinary Surgeons Act 1966, and to introduce Amendments to RCVS requirements as appropriate, which will
 - recognise more international veterinary universities as UK equivalent;
 - modify the entrance exam to be bespoke for public health vets;
 - revise the IELTS required standard; and
 - enhance the UK Vet Universities curriculum to include more references to Public health.

For further information about the challenges of Vet recruitment in Scotland, and about any of the issues highlighted in FSS's evidence, please contact:

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