

RSPCA Assured: Executive Summary

This report is prepared solely for the use of the RSPCA Board of Trustees and senior management of RSPCA and RSPCA Assured only and is part of a continuing dialogue between RSPCA and ourselves. The assignment was undertaken in accordance with the scope of work agreed with the RSPCA Trustees. Therefore, we make no representation as to the sufficiency or appropriateness of the information in our report for third party purposes. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the RSPCA for our work or for the opinions we have formed. Details may be made to specified external agencies, but otherwise the report should not be quoted or referred to in whole or in part without prior consent. Insofar as this report refers to matters of law, it should not be taken as expressing any formal opinion whatsoever.

Review objective

The following were the overarching objectives of the review:

- (a) Provide a proportionate review of the overall effectiveness of RSPCA Assured's current assessment process and its delivery
- (b) Provide a bespoke review of a significant sample of farms on the scheme in order to determine if higher welfare outcomes are consistently being achieved through the scheme.
- (c) Review of the current proposals for changes to assessment delivery and the impact they will have on the scheme, while determining any gaps in light of the findings in (a).

Report Context

The programme of over 200 Unannounced Visits undertaken as part of (b) were focussed on the "Five Domains". These did not consider all of the standards which would be undertaken as part of a planned visit (which would include a more in-depth review of record keeping). However, in reading this report, it should be stressed that the number of compliance factors is on average over 500, with the specifics dependent on the animal and covering all stages of the animal's life (although the visits did not cover all individual standards as part of the review, such as those involving all administrative records, given that the visits were unannounced).

We have also undertaken a number of measures to ensure that the review was independent. In summary, 50% of the farm visits were undertaken by a specialist third party audit body subcontracted to Crowe, or a Crowe team member attended a site visit undertaken by an RSPCA Assured assessor. Crowe also attended training for those undertaking visits and briefed the team members on the review. We have also reviewed all completed reviews to confirm the records of the visit taking place.

RSPCA Assured have in parallel undertaken a detailed review and investigation, including prior year findings and follow up of differences between any assessments undertaken by RSPCA Assured and Animal Rising. We have not visited these farms as part of this review.

Our conclusions

Based on the review and the work undertaken the RSPCA Assured Scheme is operating effectively to provide assurance that animal welfare standards are being met across members.

Overall, the current assessment process to determine whether new members and existing members are upholding RSPCA welfare standards is being carried out effectively, with clear and robust processes and controls to help ensure assessments are undertaken with sufficient competence and impartiality. The unannounced visit programme, which formed the main element of this work, has similarly supported the view that members are in general abiding by the relevant welfare standards, with limited numbers of outliers in line with those identified through the annual reassessment process.

Critically, the findings for the Unannounced programme of farms sampled were consistent with the results of standard Planned Assessment Visits, which suggests that current assessment programme is detecting non-compliances and that there aren't wider welfare issues. In addition, the levels of non-compliances were not significantly different between those undertaken by RSPCA Assured Staff and those undertaken by the third-party audit body, which provides further assurance as to the work of the RSPCA Assured assessors.

There were no significant indications, from the non-compliances identified, that there was wider animal welfare concerns identified from the programme of unannounced reviews than were being identified as part of the current processes.

As such, the findings from our work support the objective of the Scheme that higher welfare outcomes are being achieved, with 50% of all farms visited not having any identifiable areas of non-compliances, and 93% having less than five non-compliances out of an average of over 500 standards, dependent on the species (although the visits did not cover all individual standards as part of the review, given these were unannounced).

An initial random sample of 225 farm sites were selected for unannounced visits, aligned to the species profile of RSPCA Assured farms and there were 294 total non-compliances. The majority of these non-compliances were for minor or administrative issues.

225 unannounced visits have been completed (of which 200 were able to fully assessed) and there were approximately 22.5 million individual animals on site at the point of inspection. Half of these visits were completed by the third party or had an independent auditor on site. All results and outcomes were subject to independent review. For "failed visits" the majority were through there being no RSPCA Assured stock on site. In a minority of cases access was not available within a timely basis (generally within a maximum of one hour of arrival at the site) or access not being provided. The latter cases were subject to immediate action and follow up.

Currently, the Scheme does not utilise a formalised ratings criteria for non-compliances as is the case in other certification schemes (such as High/Medium/Low or 1-5 based on the potential impact on animal welfare from the standard not being met). However, this is clearly factored into any investigations undertaken when considering animal welfare and when concerns are raised or non-compliances identified. We have raised recommendations (and action has already been taken) to apply a grading system to all non-compliances identified as a result of our work which can be further developed as part of the Transformation programme.

However, our review has identified opportunities to strengthen governance, including executive and Board engagement and the wider systems and structures to support the

Scheme in achieving its objectives. There is also a need to move to a systemic, rather than people centric control environment.

RSPCA Assured has already put together a proposed new Target Operating Model as part of its transformation programme to modernise the scheme. The Target Operating Model (TOM) covered a number of the more operational areas, although our recommendation is that the scope of the TOM is broadened to encompass governance and culture to help ensure the objectives of its transformation programme are achieved. The more cultural and governance related factors were not included and would require development as part of the wider Transformation programme across RSPCA Assured.

Going forwards it is key that the Transformation programme is sponsored and supported by executive and non-executive leadership, requiring resourcing, cultural and effective systemic change.

In total we have raised 20 recommendations for action as a result of our review across three themes (Governance and Culture, Member Non-compliance and Systems and Ways of Working). These comprise nine high priority, eight medium and three low priority. Key recommendations include:

- The need for a period of stability across RSPCA Assured to embed the Transformation programme, recognising the prior period has had upon staff. Benefit realisation needs to be tracked throughout this change programme.
- Engagement from both RSPCA and RSPCA Assured Board members, as part of induction processes, to understand the farming industry and the work of Assured.
- Aligned to the greater understanding, is to define more clearly risk tolerance and appetite positions regarding non-compliances and for these to be a critical factor in monitoring the Scheme going forwards and informing resourcing decisions.
- Changes and development of incident response approaches for RSPCA Assured to prevent siloed decision making and rapid response to concerns raised.
- Development of scoring and classification systems for non-compliances to help ensure structure in the responses to findings.
- Establishing an approach, as the proposals regarding the shift to greater Unannounced visits are introduced, for immediate escalation and sanctions for refused visits.
- Undertake additional investigation into the key concerns raised as a result of the Unannounced Farm Visits.
- Develop an approach to identify potential concerns regarding farmer and stockkeeper welfare and how this may impact upon animal welfare.

Our evidence

- Interviewed a cross section of stake holders across RSPCA Assured, including Executive, Management, Assessors, the Certification Body and Accreditation Body.
- Overseen a programme of 225 Unannounced visits to Member Farms, determined on a random sample basis aligned to the proportion of species across membership.
- Approximately 22.5 million individual animals were on site at the point of inspection (with circa 18 million relating to salmon or trout).
- Reviewed requested documentary evidence.
- Reviewed the Transformation Plan and Target Operating Model.

Key Findings

- There are clear and structured processes regarding the assessment process, including the skills, competencies and training of the Assessors and the role of the Certification Body.
- Staff were knowledgeable and engaged in the Scheme, recognising both current and future challenges in delivering the mission of RSPCA Assured.
- We observed a range of good practice in the programme of Unannounced visits, including testing methods being applied, records being provided on a timely basis (or where not, non-compliances were raised), non-compliances were raised by the assessor at the time of the observation, including rectification timescales being clearly explained.
- Findings from unannounced reviews were broadly in line with announced reviews carried out by RSPCA Assured suggesting that the current process is satisfactory for detecting non-compliances.
- Although at the outset of this review there was a level of uncertainty as to how results would differ if unannounced visits were undertaken on a large scale as opposed to regular scheduled assessments, non-compliance numbers have to date not differed in proportion to those identified during regular assessments.
- The overall findings of the Unannounced programme further demonstrate the wider benefits of the planned shift to a greater level of unannounced visits. The planned visits currently have considerable record keeping requirements which inherently requires a level of notice for the visit to be successful. Moving to a wider programme of unannounced visits which focus on animal welfare and site inspection will help ensure a continuous cycle of lessons being learnt and standards being maintained throughout the year. As per the thematic findings below, the non-compliance issues relating to animal welfare can be addressed through timely intervention.

There were the following key observations from the site visits:

- There were two outlier sites in terms of non-compliances identified, one laying hen site (14) and one salmon site (16).
- Salmon sites had on average the highest number (6) of non-compliances. This was driven by the lack of welfare data and inability to verify paperwork, with two specific sites being attributable for driving this higher average score. Aquaculture also requires specific skill sets and also has a relatively higher number of compliance requirements.
- Thematically, enrichment was a non-compliance issue (across laying hens, pullets, chickens and turkey sites), which principally relates to there being insufficient strawbales in place.

- House provisions, e.g. access to the range, was an issue for laying hens and pullets.
- Litter maintenance, e.g. areas of wet litter, was an identified issue for laying hens.
- Water provision was also identified as a theme across turkey sites (although the relative sample size was low).
- Pig sites had relatively less non-compliance, in part due to the sites for pigs having fewer particulars than hens or salmon, e.g. technical equipment and other requirements for the environment like pop-holes and perches.

The following reflect the findings from our review of the Scheme and Transformation plan:

- Changes to senior management and prolonged secondments have caused delays to decision making and effective resource planning which have clearly impacted the effectiveness of the Transformation programme.
- Going forwards there should be a greater focus on ongoing Trustee engagement from both RSPCA and RSPCA Assured, with an emphasis on establishing defined risk appetite levels to inform resourcing decisions. This should align with the approach being implemented by the RSPCA, with preliminary work underway to develop thinking in this area by RSPCA Assured.
- Weighting and classification of non-compliances requires development, which has contributed to relatively low levels of analysis and a lack of risk-aligned correction timescales.
- Thematic analysis and reporting of non-compliances is not yet at a structured and mature level.
- The investigations and sanctions process and appeals process require further clarification.
- There should be clearer routing processes when potential issues are raised through the number of different sources across both RSPCA and RSPCA Assured.
- Workforce planning has a high level of flexibility for RSPCA Assured assessors, though this does not at times support efficiency in resource allocation. This is an opportunity to address going forwards, particularly with the planned move to greater levels of unannounced visits.
- Farmer or stockkeeper wellbeing is not routinely assessed as a contributing factor affecting animal welfare and non-conformances. This presents an area of opportunity to develop.
- There are numerous known inefficiencies in the assessment process as a result of technological and resourcing challenges.
- A transition of the Scheme to a focus on unannounced visits would necessitate increases in data collection from members to provide oversight of general livestock information and welfare records. However, this would enable the site visits to be focussed on animal welfare and following up exceptions in record keeping.