

# TR586 Tuberculin skin test audit: Minimum requirements

August 2026

## Change notice

The following changes have been made to version 8:

- Part 1, point 7 Tuberculin storage updated

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**! Important** This document may contain tables that are not in an accessible format. If you require an accessible version, please submit a request via Content Cloud+ helpdesk.

## Scope

1. The following audit checklist represents the minimum standard of audit that must be delivered for all TB testers carrying out the tuberculin skin test, regardless of who is delivering the audit.
2. This minimum standard may be enhanced by audit providers to satisfy their own audit requirements.
3. The nature of the non-compliances that may be encountered are indicated and rated according to severity. The categories are based on the **potential** impact the non-compliance could have, not on the **actual** impact on the test being carried out. Any non-compliance that falls into the 'critical' category could potentially affect the validity of the test. The category of non-compliance will inform the decision regarding the nature and severity of the sanctions to be applied (see Part 2 below). See Reporting audit outcomes to APHA below for situations where the auditor must contact APHA.
4. Auditors must also refer to the TB Auditing Standard Operating Procedure Document (TR315) for the areas to be covered during the auditing process.
5. Prior to conducting an audit, the auditor must confirm that the person to be audited holds the correct authorisation to carry out tuberculin skin testing, either under the:
  - Official Controls Qualification (Veterinary) - Tuberculin Testing (OCQ(V) - TT) for veterinary surgeons or
  - OCQ (Animal Health Paraprofessional) - Approved Tuberculin Tester (OCQ(AHP) - ATT) for paraprofessionals.

## Part 1

| Assessment area             | Category of non-compliance                                                     |                                                     |              |                                                                                       |                                                                                                                                                             |
|-----------------------------|--------------------------------------------------------------------------------|-----------------------------------------------------|--------------|---------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                             | Satisfactory                                                                   | <div>NOT SATISFACTORY</div> <div>UNACCEPTABLE</div> |              |                                                                                       |                                                                                                                                                             |
|                             |                                                                                | Minor                                               | Intermediate | Major                                                                                 | Critical                                                                                                                                                    |
| General                     |                                                                                |                                                     |              |                                                                                       |                                                                                                                                                             |
| 1. Time of reading of test  | Test reading at TT2 completed within 72 +/- 4 hours of TT1.                    |                                                     |              |                                                                                       | <div>Failure of TB tester to turn up at TT2.</div> <div>Test not started or completed within 72 +/- 4 hours.</div> <div>(Escalate to APHA for advice)</div> |
| 2. TB tester at TT1 and TT2 | Same tester testing at TT1 is reading at TT2 unless APHA authorises otherwise. |                                                     |              | A different tester reads at TT2 without APHA authorisation.<br><br>(Escalate to APHA) |                                                                                                                                                             |

| Hygiene                                               |                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                   |                                                                                                                         |                                                                                                                                                                |  |
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| <b>3. Protective clothing</b>                         | <p>All protective clothing must cover any normal clothing completely, be clean on arrival, suitable for cleansing and disinfection (C&amp;D), or can be removed and sealed in a bag prior to leaving the premises</p> <p>e.g. Wellington boots plus protective layer which is removed before leaving the farm.</p> <p>Brown coats/paper overalls which are removed and bagged before leaving the farm.</p> | <p>Clean but incomplete protective outer layer and no spares available.</p> <p>Waterproof Personal Protective Equipment (PPE) items significantly perished or damaged so that clothing underneath is exposed.</p> |                                                                                                                         | <p>Soiled or no protective clothing prior to start of testing.</p> <p>Failure to agree to C&amp;D or about to start test without having completed C&amp;D.</p> |  |
| <b>4. Cleansing and Disinfection (C&amp;D) of PPE</b> | <p>C&amp;D completed before and after testing.</p> <p>Use of a Defra approved disinfectant at the correct dilution rate.</p>                                                                                                                                                                                                                                                                               | <p>Disinfectant dilution rate is incorrect or disinfectant is not accurately measured.</p> <p>A part of C&amp;D, equipment is missing but procedure still</p>                                                     | <p>Poor C&amp;D technique.</p> <p>C&amp;D not completed before testing (unless clean/new kit then reduce to minor).</p> | <p>No C&amp;D of PPE after testing or both before and after testing.</p> <p>No disinfectant or use of a non-approved disinfectant.</p>                         |  |

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|                                                                        |                                                                                                                          | carried out effectively. | Significantly incomplete equipment resulting in ineffective C&D.                                                 |                                                                                                                                                                                                  |  |
| <b>5. Cleansing and Disinfection (C&amp;D) of TB testing equipment</b> | Test equipment visibly clean.                                                                                            |                          | Test equipment not C&D after testing.                                                                            | <p>Dirty testing equipment.</p> <p>No equipment carried for C&amp;D of TB testing equipment (N/A if going back to practice to C&amp;D and all kit properly bagged to prevent contamination).</p> |  |
| <b>6. Vehicle Cleanliness</b>                                          | Vehicle clean on arrival other than any dirt that would reasonably be expected to accumulate on the journey to the farm. |                          | Vehicle dirty on the outside and visibly contaminated with manure/slurry but vehicle not taken into animal area. | <p>Vehicle dirty on the outside and visibly contaminated with manure/slurry and vehicle taken into animal area.</p> <p>Vehicle contaminated with faeces inside and out, irrespective of</p>      |  |

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|  |  |  |  | where parked on the premises. |  |
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| Tuberculin                   |                                                                                                                                                                |                                                                                                                                                                     |                                                                               |                        |                                                                                                                                                                                 |
|------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------|------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>7. Tuberculin storage</b> | Vials protected from light, adverse temperature and dirt. Stored according to data sheet and APHA instructions.                                                | Poor stock control - unnecessarily high amount of vials unrefrigerated in vehicle.                                                                                  | Not stored according to data sheet and APHA instructions.<br><br>Dirty vials. |                        | <b>Not stored according to data sheet and APHA instructions and therefore likely to affect efficacy of the test - frozen/overheated.</b>                                        |
| <b>8. Tuberculin use</b>     | New un-broached vials.<br><br>Use of corresponding avian and bovine batch numbers.<br><br>Only one set of corresponding batches used for test.<br><br>In date. | Avian and bovine tuberculin batch numbers correspond, but more than one set of corresponding batches used.<br><br>Poor stock control or high wastage of tuberculin. | Tuberculin batch numbers recorded incorrectly for test report.                | Use of broached vials. | <b>Use of out of date tuberculin.</b><br><br><b>Use of vials which have visibly contaminated contents.</b><br><br><b>Non corresponding avian and bovine batch numbers used.</b> |

|                             |                                                                                                                                                        |                                                                                                                                      |                                                                   |  |                                                                                                                                                                                                                    |
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|                             | Adequate number of vials.                                                                                                                              |                                                                                                                                      |                                                                   |  |                                                                                                                                                                                                                    |
| <b>Equipment</b>            |                                                                                                                                                        |                                                                                                                                      |                                                                   |  |                                                                                                                                                                                                                    |
| <b>9. Testing equipment</b> | <p>Functional and well maintained:</p> <p>Syringes, clippers/scissors</p> <p>Callipers.</p> <p>Avian and bovine syringes clearly identified.</p>       | <p>Failure to bring evidence bags. (E+W only).</p> <p>Only one syringe identified from the start of the test.</p>                    | <p>Failure to carry functional testing equipment. (E+W only).</p> |  | <p><b>Attempting to test with non-functional, missing, incomplete equipment or equipment not listed in the TB Skin Testing Protocol.</b></p> <p><b>Neither syringe clearly identified as avian and bovine.</b></p> |
| <b>10. Spare equipment</b>  | <p>Full set of syringe spares or spare syringe.</p> <p>Spare scissors/clippers.</p> <p>Spare callipers.</p> <p>Spare callipers clearly identified.</p> | <p>Spare and primary callipers not clearly identified.</p> <p>Partly incomplete set of syringe spares/needles unlikely to impede</p> |                                                                   |  | <p><b>NB: Attempting to complete the test with incomplete set of equipment.</b></p>                                                                                                                                |

|                                                 |                                                                                                                                                              |                                                                        |                               |                                                                 |  |
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|                                                 | Spares readily available.                                                                                                                                    | test and ready access to spares.                                       |                               |                                                                 |  |
|                                                 |                                                                                                                                                              | No spare callipers on first or second day- but ready access to spares. |                               |                                                                 |  |
| <b>11. Equipment to swab/change the needles</b> | Enough spare needles.<br><br>Tester carries cotton wool and surgical spirit or an equivalent to swab the needles.<br><br>Clean cotton wool at start of test. |                                                                        | Dirty cotton wool swabs used. | No swabs or spirit or equivalent used to disinfect the needles. |  |

| Test performance      |                                                 |  |  |                                                                      |  |
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| <b>12. On arrival</b> | Syringes loaded from new vials before the test. |  |  | Attempt to start a test with guns loaded with tuberculin on arrival. |  |

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| <b>13. Animals identified</b>      | <p>All ear tags read and recorded at TT1 and TT2.</p> <p>If no official ear tag present, other unique identifier recorded.</p> <p>If temporary ID required, unique marker given and recorded.</p>                                                                                                                                                    | <p>An unintentional reading/recording error, which is suitably rectified and does not affect the test result.</p> | <p>Failure to use a suitable unique marker if no official ear tag present.</p>                                                                     | <p>Repeated reading or recording errors.</p> <p>Any errors which may affect the test result.</p>      | <p><b>Not all official ear tags/identities read and recorded.</b></p> <p><b>(TT1 or TT2)</b></p>                                                                   |
| <b>14. Injection site location</b> | <p>Consistent and appropriate siting of injections.</p> <p>Suitable secondary sites chosen when needed. Auditors can use some discretion when accessing the suitability of the secondary site - injections placed outside of the middle third of the neck may be invalid and where there is doubt cases must be referred to APHA for a decision.</p> |                                                                                                                   | <p>One animal has an inappropriate injection site location with no reasonable explanation.</p> <p>2nd injection placed in same injection site.</p> | <p>10% or more animals with inappropriate injection site locations and no reasonable explanation.</p> | <p><b>Multiple, consistent inappropriate injection locations.</b></p> <p><b>Choosing an injection site that would be likely to invalidate the test result.</b></p> |

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|                                       | Both sides of the neck used for e.g. small calves.                                                                                                      |                                                             |                                                                                                                                       |                                                                                                                                                                                                      |                                                                                                                                                                         |
| <b>15. Injection site visibility</b>  | <p>All clip marks are visible.</p> <p>All injections placed in clipped area.</p>                                                                        | One animal has a single clip mark to place both injections. | <p>Two or more animals have a single clip mark to place both injections.</p> <p>One or two injections not placed in clipped area.</p> | <p>10% or more animals with no visible clip marks.</p> <p>Consistent intentional failure to make two clip marks, one per injection.</p> <p>Three or more injections placed outside clipped area.</p> | <p><b>Consistent intentional failure to clip.</b></p> <p><b>No visible clip marks</b></p> <p><b>Consistent failure to ensure injections placed in clipped area.</b></p> |
| <b>16. Skin measurement technique</b> | <p>Skin measured before injection.</p> <p>Callipers consistently used accurately.</p> <p>Use of two handed technique.</p> <p>Measurements recorded.</p> |                                                             | <p>One animal not measured accurately but does not affect the outcome of the test.</p> <p>One animal measured with one hand.</p>      | <p>Accuracy of measuring technique questionable. Two or more animals measured inaccurately but does not affect the outcome of the test.</p>                                                          | <p><b>Clearly or intentionally inaccurate measurements taken.</b></p> <p><b>Consistent failure to measure using both hands.</b></p>                                     |

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|                                                   |                                                                                                                                                                                                                                                                                       |  | Skin measured after injection. | Two or more animals measured with one hand. | <p><b>Inaccurate measurement affects test outcome.</b></p> <p><b>Skin estimates used instead of calliper measurements.</b></p> <p><b>Not all skin thicknesses measured/recorded and not corrected on the day.</b></p>                                                                                                                                                                                                                                             |
| <p><b>17. Intradermal injection technique</b></p> | <p>Use of injection technique which will consistently produce an effective intradermal injection.</p> <p>All injection sites examined showed evidence of an effective intradermal injection.</p> <p>Avian and bovine tuberculins are administered in the correct injection sites.</p> |  |                                |                                             | <p><b>Consistent intentional failure to use a technique which would achieve an effective intradermal injection.</b></p> <p>NB: Professional judgement should be used to determine if a successful intradermal injection has been achieved. In fatty or very thick skin (e.g. adult breeding bulls) with apparent good technique the nodule can be subtle.</p> <p><b>Wrong tuberculin injected in wrong site and not corrected by reinjection at alternate</b></p> |

|                                                                     |                                                                                                                                                                                                                                                                                                                                                                       |  |                                                                                                                          |                                                                                                                 |                                                                                                                                                                                                                                                                                                                                |
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|                                                                     | <p>(avian top, bovine bottom).</p> <p>Tester is fully aware of the protocol to follow if the syringe has been filled with the wrong tuberculin.</p>                                                                                                                                                                                                                   |  |                                                                                                                          |                                                                                                                 | <p><b>site or error not recorded on TB52 - critical for the animal(s) affected.</b></p> <p><b>The syringe is accidentally filled with the wrong tuberculin and the protocol is not followed.</b></p>                                                                                                                           |
| <p><b>18. Inspection and palpation of injection sites Day 1</b></p> | <p>All sites <b>visually</b> inspected to verify that the area is clearly blemish-free and relevant findings recorded.</p> <p>All sites palpated after injection to verify effective intradermal injection. Discretion can be applied when the nodule is clearly visible.</p> <p>When not confirmed a suitable secondary site is chosen. This action is recorded.</p> |  | <p>No inspection/recording of lumps/blemishes on neck, but injections not carried out at sites with lumps/blemishes.</p> | <p>Injection at sites with prior lumps/blemishes and no inspection/recording of skin blemishes on the neck.</p> | <p><b>Consistent repeated failure to palpate to verify intradermal injection.</b></p> <p>NB: Professional judgement should be used to determine if a successful intradermal injection has been achieved. In fatty or very thick skin (e.g. in adult breeding bulls) with apparent good technique the nodule can be subtle.</p> |

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| <b>19. Needle changes</b>  | <p>Needles changed between farms.</p> <p>Needles changed during the test when appropriate i.e. bent blunt, visibly contaminated with blood/faeces etc.</p>                                   | <p>Needles used when clearly bent or blunt but producing a nodule</p>                                                                                      |                                       | <p>Needles not changed but cleaned with swabs when visibly contaminated with blood or faeces.</p>      | <p><b>Needles used when visibly damaged and not producing a nodule.</b></p> <p><b>Grossly contaminated needles not changed.</b></p> <p><b>Evidence that needles not changed between farms.</b></p> |
| <b>20. Needles swabbed</b> | <p>Needles swabbed between every animal.</p> <p>On inspection swabs are moist and clean.</p> <p>Cotton wool or cotton swabs used- in holsters or separately</p> <p>Surgical spirit used.</p> | <p>Needles swabbed at irregular intervals.</p> <p>On inspection swabs have been allowed to become dry or dirty.</p> <p>Non-approved disinfectant used.</p> | <p>On inspection swabs are dirty.</p> | <p>No attempt to swab needles between animals.</p> <p>No swabs or spirit carried for this purpose.</p> |                                                                                                                                                                                                    |

|                                                               |                                                                                                                                                                                                                                                |                                                                                                                        |                                                                                                                                                                                                      |                                                                                                                                                    |                                                                                                                                                                                                                                                                                       |
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| <b>21. Palpation and measurement of injection sites Day 2</b> | <p>All animals palpated.</p> <p>All skin reactions are detected if present.</p> <p>If reaction/s is/are present both skin sites are measured and recorded.</p> <p>The nature of the skin reactions are recorded (e.g. presence of oedema).</p> |                                                                                                                        | <p>All animals palpated, but failure to detect, measure or record one or two skin reactions or findings (no impact on test result).</p> <p>Both sites not measured when a single reaction found.</p> | <p>Failure to palpate, detect, measure or record skin reactions or findings in two or more sites (no impact on test result).</p>                   | <p><b>Not all animals palpated.</b></p> <p><b>Clearly inadequate attempt to palpate.</b></p> <p><b>Consistent intentional failure to detect, measure or record skin reactions.</b></p> <p><b>Failure to detect, measure or record skin reactions which impact on test result.</b></p> |
| <b>22. Interpretation of skin measurements</b>                | <p>Day 1 and Day 2 measurements are compared while the animal is restrained.</p> <p>Any Day 1 remarks reviewed.</p> <p>Correct interpretation using prescribed level of severity.</p> <p>Carries an appropriate test interpretation chart.</p> | <p>Failure to possess or use an appropriate interpretation chart or alternative system (no impact on test result).</p> | <p>Day 1 and Day 2 measurements are compared once the animal is released (no impact on test result).</p>                                                                                             | <p>Failure to identify Reactors or IRs due to incorrect interpretation used (test validity not affected but further training may be required).</p> | <p><b>Failure to possess Day 1 data/skin measurements.</b></p> <p><b>Failure to compare Day 1 and Day 2 measurements.</b></p> <p><b>Failure to review Day 1 remarks.</b></p>                                                                                                          |

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|  | NB: handheld device identifies Reactors and Inconclusive Reactors (IRs), so no chart required. |  |  |  |  |
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| Additional tasks                      |                                                                                                                                                                                                                                                                    |                                                                                                                            |                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                        |  |
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| <b>23. Reactor tagging (TT2 only)</b> | <p>Tags correctly applied in a secure site with minimal trauma.</p> <p>Both tag parts carry the same number.</p> <p>Tag number recorded against animal ID.</p> <p>Tissue sample successfully collected.</p> <p>Sample placed in a fully labelled evidence bag.</p> | <p>One or more tags placed in inappropriate sites.</p> <p>Insufficient reactor tags carried and not readily available.</p> | <p>One or more tag applications causes unnecessarily excessive bleeding.</p> <p>Tag number not recorded against animal ID.</p> <p>Dirty tagging equipment. Failure to seal the bag before leaving the farm.</p> | <p>Failure to apply reactor tags to eligible Reactor animals. No reactors tags carried or readily available. Samples not placed directly in an evidence bag.</p> <p>Bag not labelled correctly or fully before leaving farm. Failure to label the evidence bag correctly, i.e. ID of the animal on</p> |  |

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|                                                                            | <p>Sufficient reactor tags carried or readily available i.e. at least five tags (unless fewer than five animals tested) and then:</p> <p>a) at least 5% of animals tested up to a maximum of 25 tags in High Risk Area (HRA)/High TB Area Wales (HTBAW) and Edge Area/Intermediate TB Area Wales (ITBAW) and</p> <p>b) at least 1% of animals tested in Low Risk Area (LRA)/Low TB Area Wales (LTBW).</p> |  |                                                                                            | the label from a different animal to that tagged. |                                                                                                     |
| <b>24. Clinical examination of Reactors, IRs and other suspect animals</b> | All suspect animals visually examined; clinically examine animals if signs compatible with TB or                                                                                                                                                                                                                                                                                                          |  | Failure to carry a stethoscope and thermometer when applicable or to use these on clinical |                                                   | <b>Failure to identify/record/report suspect animals with obvious relevant clinical signs of TB</b> |

|                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                            |  |                                                                                                                                                                                                               |                                                                              |                                                                                                    |
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| <p><b>NB: Clinical examination not applicable for Approved Tuberculin Testers (ATTs) and APHA Technical Officers however they are required to report any clinical signs of TB or other notifiable disease to a vet</b></p> | <p>other notifiable diseases are observed (vet only).</p> <p>Possession of a stethoscope and thermometer which are used during the examination (vet only).</p> <p>All relevant findings recorded.</p>                                                                      |  | <p>examination (vet only).</p> <p>Failure to identify/record/report animals with minor but relevant clinical signs.</p>                                                                                       |                                                                              | <p><b>or other notifiable disease.</b></p>                                                         |
| <p><b>25. Establishing eligibility</b></p> <p><b>Reasonable (verbal assurances from owner) efforts must be made to resolve missing or manually entered animals</b></p>                                                     | <p>For herd tests:</p> <p>Eligible animal groups identified.</p> <p>Reasons for not testing any eligible animals established.</p> <p>Identity of ineligible individuals established.</p> <p>Reasons why animal tested on Day 1 but not presented on Day 2 established.</p> |  | <p>Attempts made to ascertain eligibility, but some ineligible animals unintentionally tested or some eligible animals omitted.</p> <p>Reasons for not testing eligible animals on Day 1 not established.</p> | <p>No attempt made to establish whether cattle are eligible for testing.</p> | <p><b>No attempt made to establish why animals tested on Day 1 are not presented on Day 2.</b></p> |

|                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                    |
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|                                        | Calves tested if eligible.                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                    |
| <b>26. TB52 worksheets/equivalents</b> | <p>Using TB52, document of similar format or a suitable handheld device.</p> <p>For herd tests:</p> <p>Possessing up to date herd profile data with the download taking place no more than 2 working days prior to TT1 except in exceptional circumstances.</p> <p>For manual entries: Recording ID, breed, age, sex (and, if using a download, a comment that they have been added manually).</p> <p>CPH, location, test date.</p> | <p>For herd tests: failure to possess up to date herd profile data (download more than two working days prior to test)</p> <p>For manual entries: ID recorded, but not breed, DOB/age or sex, CPH, location, test date.</p> | <p>Failure to use TB52 worksheet, or document of similar format to the TB52, or handheld device to record information required.</p> <p>Minor errors in test records.</p> <p>Failure to retain a copy of the TB52 or equivalent for three years and 60 days.</p> | <p>Attempting to complete records on a blank piece of paper, card or other object.</p> <p>Significant errors in test records.</p> <p>Any error in test records that affects the test result.</p> | <p><b>Complete absence of test records.</b></p> <p><b>Inadequate/no checks made on completion of TB52 by farm staff/family during a test.</b></p> <p><b>Original test records (paper or digital) left with the keeper between TT1 and TT2. A copy/photo can be left or sent for reference.</b></p> |

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|  | Maintain adequate control of TB52 or equivalent during and after test and adequate checks made if being completed by farm staff/family. |  |  |  |  |
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| Herd keeper information                                         |                                                                                                                                                    |                                                                                                                |  |                                                                                                                                              |  |
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| <b>27. Test results communicated - Reactors, IRs identified</b> | Reactors or IRs identified to keeper as test is read.                                                                                              | Reactors or IRs not communicated to keeper until end of test.                                                  |  | Keeper not informed of the finding of Reactors and IRs at all.                                                                               |  |
| <b>28. TB181 information sheet issued and explained</b>         | When appropriate TB181 information sheet issued and explained at the end of the test.<br><br>Owner told to isolate Reactors and IRs. IRs not to be | TB181 issued but not explained.<br><br>Failure to carry TB181 forms.<br><br>OV unaware of when to issue TB181. |  | TB181 form not issued when it is appropriate to do so.<br><br>Incorrect advice given.<br><br>Owner not informed to isolate Reactors and IRs. |  |

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|                                  | <p>grouped with Reactors.</p> <p>Resolved IR Restricted for Life policy explained (England and Wales only).</p>                        | Incorrect TB181 version used.                                                                                        |                                                                                                                                                              | Resolved IR Restricted for Life policy not explained (England and Wales only). |  |
| <b>29. Farm medicines record</b> | <p>Owner informed of the need to enter tuberculin details in medicine record.</p> <p>Correct batch numbers and expiry dates given.</p> |                                                                                                                      | <p>Owner not informed of the need to record tuberculin batches and expiry dates in medicines record.</p> <p>Incorrect tuberculin details given to owner.</p> |                                                                                |  |
| <b>30. Required forms</b>        | <p>Tester gathers all relevant forms.</p>                                                                                              | <p>Failure to carry TR247 (Owner's checklist).</p> <p>Tester unaware of when to issue TR247 (Owner's checklist).</p> |                                                                                                                                                              |                                                                                |  |

## Serious professional misconduct

1. APHA will consult the following Royal College of Veterinary Surgeons (RCVS) guidance in relation to serious professional misconduct when considering corrective action:
  - In general terms unethical or unprofessional behaviour is behaviour that falls short of the ethical or professional standards, guides or codes of conduct, accepted by a particular profession. Unethical or unprofessional behaviour is essentially a departure from the standard of behaviour expected as the normal among members of the profession
  - For a veterinary surgeon, unethical or unprofessional behaviour might mean a failure to follow the guidance or advice within the RCVS Code of Professional Conduct
  - Such a failure will not amount to serious professional misconduct, unless it is serious enough to question whether the veterinary surgeon should remain registered with the RCVS i.e. question whether he or she is fit to practise or work as a veterinary surgeon.
2. Examples of serious professional misconduct include, but are not limited to:
  - Deliberate falsification or reckless completion of records
  - Deliberate or reckless misreading or misreporting of the test result of an animal
  - Inhumane treatment of animals, abusive or threatening behaviour
  - Deliberate and systematic disregard of the tuberculin testing protocol
  - Accepting any bribe or financially motivated inducement (such as the threat of loss of future business) to influence the results of current or future tests
  - Seeking to attract or retain clients on the understanding that testing will be carried out below standard, at excessively high speed or that results may not be reported accurately
  - Coercion of a colleague or employee to commit any of the above offences

## Invalid tests

1. Invalid tests include cases where the animals had not been injected with tuberculin in good condition, where injection sites cannot be identified, where official animal identities had not been recorded, and where skin measurements are grossly inaccurate or inconsistent or not made at all.

2. In such cases, no payment will be made for the test and all or part of the herd may be restricted pending retest after 60 days. Reasonable efforts will be made to salvage the test by, for example, calling on a competent person to re-measure the cattle.
3. APHA will not normally apply such measures on a precautionary basis to herds previously tested but may do in the event of clear evidence that a test was carried out with reckless disregard to the protocol.
4. APHA will consider and document if there are any exceptional circumstances which may affect corrective action, including whether there has been discussion with APHA.
5. APHA will clearly establish whether the validity of the test relates to actions of the tester on the day, or from matters outside the tester's control when making the assessment of performance.
6. It should be noted that the liability for tester negligence falls with the tester and not APHA.

## Reporting audit outcomes to APHA

1. Auditors must contact APHA on the day of the audit in the following situations:
  - where one or more major or critical non-compliances are recorded on an audit
  - where the auditor has serious concerns about the quality of the TB testing, for example multiple minor and/or intermediate non-compliances
  - where the auditor has concerns about a TB tester's ability to follow the published OV or ATT TB skin testing instructions
  - where there are concerns of professional misconduct
2. If test validity is in question, the auditor must contact APHA immediately by telephone whilst still on the testing premises (see contact details below). If this is not possible, they must contact APHA at the earliest opportunity after leaving the test premises.
3. During office hours, the auditor must email the APHA OV team at: [CSCOneHealthOVTeam@apha.gov.uk](mailto:CSCOneHealthOVTeam@apha.gov.uk) to report the situations above. The subject line of the email should be populated with 'TB test audit for action' so that the email is dealt with promptly by the OV team.

4. The auditor should include the following information in their email:
  - tester's details (name, OV/ATT number)
  - TB test details (TT1 and TT2 dates, farm name and address)
  - description of the situation and non-compliance(s)
  - auditor's contact telephone number
  - where applicable, confirm that APHA has already been notified by telephone and the name of the person informed
5. On receipt of the email, the OV team will notify the Veterinary Head of OV Regulatory Affairs and refer the case to the relevant Veterinary Head of Field Delivery (VHFD)/Veterinary Lead (VL) or Veterinary Advisor (VA) for action. The VHFD/VL/VA will contact the OV/ATT to discuss the case and take action as deemed appropriate.
6. Outside of office hours, the auditor must report the situations above by telephoning the APHA duty vet using the following contact details and provide the information listed in paragraph 4 above:
  - England: 03000 200 301
  - Wales: 0300 303 8268
  - Scotland: Contact the local field services office (contact details can be found on gov.uk)
7. After the auditor has notified the duty vet by telephone, they must also email the APHA OV team with the information listed in paragraph 4 above so that they are made aware of the case and can follow up with the local field team during office hours.

## Part 2

1. Sanctions for non-compliances with TB testing requirements will be proportionate to the severity of the non-compliances or their multitude, taking into account possible rectification **in situ** and/or mitigating factors. They will be assessed on a case by case basis.
2. If the auditor observes practice that would affect the validity of the test, they must take immediate action, not allowing it to be continued and they must contact APHA immediately. Consideration must also be given to requiring re-testing/re-reading of unsatisfactorily tested animals to avoid declaring a test void and whether payment for the test should be withheld.
3. Depending on the nature of the non-compliances the action taken may include the following as listed below:
  - advice (verbal)
  - correction at the time

- putting animals back through the crush
- advice (written)
- re-training
- non-payment for test
- suspension or revocation of OCQ(V) - TT or OCQ(AHP) - ATT
- request improvement plan
- interview with Delivery Partner (DP) Senior OV and in Scotland practice principal
- refer for investigation by APHA
- suspension from all OCQs held by the individual
- referral to the Royal College of Veterinary Surgeons (RCVS).



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### **Using and sharing your information**

How we use your personal data is set out in our [Personal information charter - Department for Environment, Food & Rural Affairs - GOV.UK](#) and [Animal and Plant Health Agency privacy notices - GOV.UK](#).

APHA is an Executive Agency of the Department for Environment, Food and Rural Affairs and also works on behalf of the Scottish Government, Welsh Government and Food Standards Agency to safeguard animal and plant health for the benefit of people, the environment and the economy.