

# **ET175 Policy for APHA authorisation of export Certification Support Officers (CSOs) in Great Britain**

**May 2026 - Version 2**

## **Change notice**

The following changes have been made to Version 2:

- This document has been extensively updated and re-written, please read the new version.

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# Definitions

1. For the purposes of this document, the following definitions apply:

**a. Agency** means the Animal and Plant Health Agency, an executive agency of Defra.

**b. Animal products** means Products of Animal Origin (POAO) whether for human consumption or not, Animal By-Products (ABPs) and animal germplasm.

**c. Animal By-Products (ABPs)** means animal carcasses, parts of animals, or other materials, which come from animals but are no longer intended for human consumption.

**d. Authorisation** means official recognition by the Agency to carry out the Certification Support Officer (CSO) role and is evidenced by inclusion in the definitive list of authorised CSOs held on the Animal Health Paraprofessional database, which is managed by the Agency's Official Veterinarian (OV) Team.

**e. Central Competent Authority (CCA)**, for the purposes of export certification, means Defra and its executive agency, APHA, in relation to any international trade functions for animals and animal products as reserved to the UK Government. It extends to representing the UK and any devolved administration in negotiations relating to animal health and public health certification of imports and exports. However, Central Competent Authority (CCA) also means the devolved administrations of Scotland, Wales and Northern Ireland in relation to other matters of animal health and welfare and where they are responsible for the implementation and execution of certification of animal products and animals.

**f. Certification Support Officer (CSO)** means a person who has obtained the Official Controls Qualification (Animal Health Paraprofessional) (OCQ(AHP)) - CSO certificate and has been authorised by the Agency to act in a supporting role to Certifying Officers.

**g. Certifying Officer (CO)** means any person authorised to sign officially issued export health certificates on behalf of the appropriate Central Competent Authority.

**h. Day** means a day in the calendar, including Saturday, Sunday, bank and public holidays.

**i. Food Competent Certifying Officer (FCCO)** is a Certifying Officer authorised by the Agency, that has competencies to operate official controls under the Food Safety Act 1990 and means a person deployed by a competent authority, either as staff or otherwise, and who is appropriately qualified to perform official controls and other official activities in accordance with the Official Controls Regulation (2017/625), and any other relevant rules.

**j. Official control** means any form of control that any appropriate Competent Authority performs for the verification of compliance with feed and food law, animal health and animal welfare rules.

- k. Official Controls Qualification (OCQ)** means an accredited qualification achieved following training and assessment by a government approved training provider in a particular discipline.
- l. Official Veterinarian (OV)** means a Veterinary Surgeon appointed by the Agency to perform specific tasks on behalf of the Agency. A Veterinary Surgeon must hold an OCQ(V) qualification and be a full member of the Royal College of Veterinary Surgeons (RCVS) to be authorised by the Agency as an OV. Veterinarian and Veterinary Surgeon are interchangeable terms.
- m. Products of Animal Origin (POAO)** means products derived from animals for human consumption and includes legally defined living animals ready to be presented to the final consumer for human consumption.
- n. Revalidation** means the renewal of the OCQ(AHP) - CSO prior to its date of expiry to enable continuation of both the qualification and authorisation.
- o. RACE Team** means APHA's Regulatory, Affairs, Compliance and Enforcement Team.
- p. Revocation** means the withdrawal of CSO authorisation.
- q. Senior Veterinary Manager** is a Veterinary Surgeon directly employed by the Agency at either Grade 7 or Grade 6.
- r. Suspension** means the temporary withdrawal of CSO authorisation, pending the outcome of a specified process or action.
- s. Training Provider** means the supplier contracted by the Agency for the provision of CSO training and assurance.
- t. Verification** means checking, by examination and the consideration of objective evidence, whether specified requirements have been fulfilled or complied with.
- u. Veterinary Director** is the Head of the Veterinary Profession in the Agency
- v. Veterinary judgement** means decisions that require the application of veterinary training knowledge and competencies, as restricted by the Veterinary Surgeons Act 1966 to registered members of the Royal College of Veterinary Surgeons in the UK and as required by section 3 of the World Organisation for Animal Health (WOAH) Terrestrial Animal Health Code.
- w. Working day** means a day that is not a Saturday, Sunday, bank holiday, or public holiday.

## Introduction

2. This policy sets out the relationship between the APHA (hereafter referred to as “the Agency”) and Agency authorised individuals who hold the OCQ(AHP) - CSO qualification. The Agency acts on behalf of the relevant Ministers in England, Scotland and Wales to authorise OCQ(AHP) trained individuals who seek to carry out specific tasks on behalf of those Ministers. CSOs may provide support to authorised Certifying Officers in the area of official controls for export health certification in relation to animal products (excluding germplasm) and live animals.

3. To facilitate the effective implementation of official controls and provide support in the area of export certification, Agency authorised CSOs may be engaged by and can only act under the direction of an Official Veterinarian (OV) who holds the OCQ(V) - Products (PX) certificate and is authorised by the Agency, or is an authorised Food Competent Certifying Officer (FCCO).

4. The CSO shall be directed by those officers identified in paragraph 3 in accordance with the standards for authorisation of those who carry out official controls or official tasks. These standards are laid down in European and domestic legislation, particularly Regulation (EU) 2017/625 on official controls and other official activities to ensure the application of food and feed law, rules on animal health and welfare and plant health and plant protection products’ (also known as “the OCR Regulation”). This Regulation is directly applicable law in Great Britain.

5. The World Organisation for Animal Health (WOAH) also sets standards for the designation and conduct of officials in relation to the certification of animals and animal products for international trade. This is detailed in Section 3 of WOAH’s Terrestrial Animal Health Code concerning the quality of veterinary services.

## Authorisation

6. The Official Controls Qualification (OCQ) for CSOs is an accredited qualification achieved following the successful completion of training and assessment by a government approved provider (hereafter referred to as “training provider”). To be eligible to enrol on the theory training, a Certifying Officer (CO) who is the candidate’s employer or a representative of their employer must declare that the candidate meets all the requirements for employment as a CSO. A CSO must:

- be at least 18 years of age at initial application
- have passed Identification and basic Disclosure and Barring Service (DBS) security checks
- as a minimum have three A levels (or equivalent relevant qualifications e.g. Scottish Highers), one of which must be in a science or a food technology subject. If this eligibility criterion is not met, at least three years’ experience of working in a regulatory/enforcement role related to food hygiene/standards, an industrial food

processing environment or as a veterinary paraprofessional will be considered by the Agency on a case-by-case basis.

7. The Agency will authorise as a CSO any person who:

i) Holds a valid OCQ(AHP) - CSO certificate demonstrating their understanding in relation to delivering the relevant activities, and

ii) Is regarded by the Agency as suitable for carrying out tasks on behalf of Ministers, taking into account any previous performance as an official and as verified by a Certifying Officer via the training provider's records.

8. Once authorised, the CSO shall be included in the definitive list of officially authorised CSOs on the AHP database that is managed by the Agency's OV team.

9. At no time shall a CSO be considered an Agency member of staff or an employee of government.

10. For new applicants, once OCQ(AHP) - CSO training has been successfully completed and the CSO provided with their certification from the training provider, the Agency will complete the authorisation process and the successful applicant will receive the following:

- CSO authorisation by email notification from the training provider
- CSO Stamp and Terms and Conditions of Use. The stamp shall bear a unique number assigned to that CSO
- A unique identifier number on authorisation

11. The training certificate issued by the training provider alone does not provide authorisation to act as a CSO. Authorisation is granted by the Agency on issuance of the authorisation email notification referred to in paragraph 10.

12. Such authorisation shall be made within ten working days of obtaining the OCQ(AHP) - CSO certificate, providing all other requirements have been met.

13. Applicants must not act as a CSO until they have received their authorisation email notification and official stamp.

14. Authorisation as a CSO will be for a period of four years from the date of obtaining the OCQ(AHP) - CSO certificate.

15. A CSO authorisation is not a guarantee or representation by the Agency of the amount and nature of the work required to be performed as a CSO.

16. Where an electronic signature is required to be affixed to an authorised document, the signature provided by the CSO at the time of registration with the training provider and which is maintained on the personal training dashboard relating to that CSO shall be used. Changes of name must be updated on the training record without delay.

17. The Agency will only supply critical materials such as CSO stamps to CSOs who are authorised for the relevant task. It is important to remember that the stamp is and remains, the property of APHA. APHA will instruct the destruction of any stamps if a CSO is removed from the authorised list.

18. All official communication to an individual in relation to authorised status will be via the email address that is registered by the CSO on the training provider's database. It is a condition of the authorisation that this email address must be kept up to date.

## Revalidation

19. If the CSO's revalidation is not completed before the expiry of the four-year period, the authorisation will be suspended. The CSO has the option to revalidate the qualification at any time during the six-month period immediately following the deadline to have the authorisation reinstated.

20. Failure to complete the revalidation within the six-month period following the deadline will result in expiry of the authorisation.

21. The training provider will notify the CSO of the completion deadline for the revalidation and will send reminders prior to the expiry date of the OCQ.

22. The CSO may have their authorisation revalidated in the following circumstances without a break in their authorisation:

- before the expiry of the authorisation period the CSO may undertake the revalidation training and obtain a certificate confirming that retraining from the training provider
- if this revalidation is completed within the specified window for revalidation, the start date of the next period of the authorisation shall be the original revalidation deadline date
- if revalidation takes place prior to that window, the start date of the new period of authorisation shall be from the date of the certificate of completion issued by the training provider
- if revalidation takes place during the six-month period of suspension, the start date of the new period of authorisation shall be from the date of the certificate issued by the training provider.

23. Agency records shall be updated accordingly.

24. If the authorisation has been expired, the CSO will need to complete the full OCQ training or apply to the Agency for permission to revalidate outside of the deadline. The Agency retains the right to grant or refuse permission based on the reasons provided for the request.

25. It is a requirement to hold the relevant OCQ(AHP) - CSO to operate as a CSO, therefore the CSO's authorisation will expire with the expiration of the OCQ and CSOs will be unable to carry out CSO work unless revalidation is completed.

26. If a CSO is unsuccessful in obtaining revalidation, there will be an opportunity to retake the revalidation qualification again on two occasions. Following three unsuccessful attempts it will be necessary to take the full qualification again to seek reauthorisation as a CSO.

27. Spot check audits (internal verification) will be carried out by the training provider on behalf of APHA to ensure that the information being submitted at revalidation is correct and compliant. This will occur on an ongoing basis so it will not delay the revalidation process.

28. Failure to comply with revalidation requirements may result in suspension or revocation of the authorisation and depending on the circumstances, a formal investigation may be triggered.

## Performance of tasks

29. CSOs may not carry out any functions that require the exercise of veterinary judgement or that require the judgement of a food competent Local Authority (LA) Officer. CSOs are restricted to the execution of factual checks and verification of measurable parameters. They may only carry out such inspections, factual verification and evidence collection as specified by their directing OV or FCCO for the directly related product and certificate and only with respect to animal products, excluding germplasm and live animals.

30. The Agency will not supply any materials necessary for the performance of the CSO role other than the issuing of an official stamp, as described above.

31. CSOs must maintain a high standard of hygiene and biosecurity when visiting food production or other premises in the exercise of their function such as the wearing of suitable protective clothing and the correct use of an approved disinfectant, as appropriate to the situation and as specified by their directing OV or FCCO.

32. The Agency will monitor CSO performance as it sees fit through a range of checks and inspection activities including, but not limited to:

i) Analysis of data and copies of attestations or export certificates;

ii) Investigation of complaints, in particular from recipients of tasks undertaken by an authorised official; and,

iii) Reports from directing OVs or FCCOs, who are required to monitor the delivery of the CSO function.

33. To facilitate the checks carried out by APHA, CSOs are required to provide information to APHA if requested. This must be provided by the deadline given in the written request,

unless there are exceptional reasons why this is not possible. In exceptional circumstances, an extension may be granted. Failure to provide the requested information by the deadline, may result in suspension of the CSO authorisation.

## Acting in an official capacity

34. CSOs should be aware that they are acting in an official capacity when carrying out their official tasks and should be appropriately trained in the area of such official controls as are relevant to their authorised tasks. They must be capable of responding to queries related to the performance of their function while operating in the field.

35. To enable and maintain the effective performance of their role, all authorised CSOs have access to an online portal through which instructions and the CSO training module material will be made available. These reflect the requirements of relevant legislation and government policy. Additions and amendments shall be issued periodically, and it is essential that all CSOs refer to the current instructions. CSOs are expected to monitor the email address they have registered with the training provider who administers training on behalf of APHA. This is to ensure they maintain awareness of updates and changes to aspects of the work relevant to individual controls and receive notifications relating to their training and authorisation status. CSOs must therefore ensure that their contact details registered with the training provider are kept up to date.

36. CSOs maintain responsibility for the security of all information obtained during the execution of their duties whether documentary, oral, pictorial, digital, or printed. All such data is considered personal and commercially sensitive data and may not be disclosed unless authorised under applicable sections of the General Data Protection Regulations 2018 ("GDPR"). The unlawful disclosure of protected data shall be grounds for suspension or revocation of authorisation.

37. CSOs must abide by the standards set out in the CSO training module and act without conflict of interest. They must follow the guidance on certification as this underpins official activities and reflects EU legislative requirements.

38. CSOs must ensure that all their official activities are covered by professional indemnity insurance or equivalent arrangements.

39. CSOs must report any criminal convictions to the Agency immediately. The Agency will then consider whether the CSO authorisation can continue.

## Revocation of authorisation

40. The authorisation of a CSO may be revoked for several reasons. These include, but are not limited to, where the CSO:

- i) No longer meets the criteria that allow them to be authorised by APHA in paragraph 7
- or*

ii) Voluntarily requests their authorisation be revoked, giving one week's notice in writing or by email to APHA from their registered address *or*

iii) Is subject to the final decision of a review panel or appeal outcome following any investigative process *or*

iv) Is convicted of a criminal offence that renders them unfit to be a CSO.

41. If a CSO has their authorisation revoked for any of the above reasons, the Agency will send notification by email to their registered email address giving full reasons for the action taken. The CSO has a right of appeal against this decision as set out in the appeals section of this Policy for Authorisation.

## Suspension of authorisation

42. A CSO's authorisation will be suspended automatically if they do not complete the required revalidation by the deadline date (see paragraphs 19 to 22 above).

43. A CSO can voluntarily suspend their authorisation at any time giving APHA one week's notice of their intention to suspend. Notice must be provided in writing or by email from the CSO's registered email address to the APHA OV Team.

44. The authorisation of a CSO may be suspended as a precautionary measure in the following circumstances if the Veterinary Head of OV Regulatory Affairs or any Senior Veterinary Manager (not below Grade 6) in England, Scotland or Wales consider it necessary for the following reasons:

i) If a preliminary report is made by any party which the Agency considers serious enough to warrant an investigation, authorisation may be suspended until such time as the investigation process is completed and authorisation is restored or revoked as the case may be;

ii) If the Agency becomes aware of an investigation by a statutory body into the conduct of a CSO and where such investigation concerns animal health, animal welfare, public health, acts of fraud or dishonesty or violence which could affect the safe and effective performance of the CSO or bring the Agency or the responsible Minister into disrepute;

iii) If there is evidence to suggest the CSO is unable to undertake the safe, effective performance of their CSO duties due to physical or mental impairment;

iv) If, in the Agency's opinion, a CSO infringes or fails to comply with official instructions or consistently performs official tasks unsatisfactorily;

v) If the CSO is no longer under the direction of an OCQ(V) - (PX) authorised OV or authorised FCCO;

vi) In case of a breach of any requirement provided for in this Policy for Authorisation, such as unlawful disclosure of data; or

vii) Any other circumstance provided for in this Policy for Authorisation.

45. Precautionary suspension of a CSO's authorisation will be initiated by the Veterinary Head of OV Regulatory Affairs or any Senior Veterinary Manager (not below Grade 6) for England, Scotland or Wales and a letter of suspension will be sent to the CSO concerned. The letter will either be sent by email or by recorded delivery. The letter will set out the grounds for the suspension and a date of commencement of the suspension. A copy of the letter will be sent to the Veterinary Head of OV Regulatory Affairs if it was not issued by them.

46. The letter will also remind the CSO to stop all activities related to being a CSO. Copies of all documents will be sent to the APHA OV Team and the Regulatory Affairs, Compliance and Enforcement (RACE) Team.

47. Where APHA has cause for concern over the conduct of a CSO but does not believe that there are grounds for suspension during the investigation, the CSO may continue to provide CSO services during the investigation.

48. The authorisation of a CSO may also be suspended subject to the final decision of a review panel or appeal outcome of any investigation where the panel considers that:

- the CSO may not be competent or may not perform their tasks to the required standards
- the CSO has infringed or failed to comply with the conditions of authorisation
- the CSO is guilty of conduct which makes suspension of the authorisation desirable in APHA's interest or in the public interest

49. Suspension of authorisation following a review panel decision will usually be for a set period of time and reinstatement may be subject to other conditions being met.

50. A CSO who is suspended shall not continue to exercise the role of an authorised CSO. The suspended CSO must surrender their stamp to their directing OV or FCCO or the Agency, in person or by recorded delivery, until such time as any investigation process is completed and authorisation is restored or revoked as the case may be. In cases where suspension relates to the absence of, or a change in directing OV or authorised FCCO, and there is an intervening period, stamps must be held by either the Agency or the previous Certifying Officer. Stamps must be returned to the Agency when authorisation is revoked.

## Investigation

51. Investigations pursuant to any potential breach of the terms of this Policy for Authorisation of a CSO shall be conducted in accordance with the following:

- i) A sole investigator, who is a permanent employee of the Agency and a Grade 6 or Grade 7 Senior Veterinary Manager, will be appointed by the Veterinary Head of OV

Regulatory Affairs or delegated Senior Veterinary Manager to carry out an investigation without unreasonable delay;

ii) APHA shall notify the CSO in writing of the terms of the allegations and request a relevant account from the CSO in writing or in person. Such notification shall be sent to the CSO's registered email address;

iii) An investigation would normally include a meeting with the CSO to enable them to present further evidence and explanation. However, in some cases the investigator may decide that this is not necessary. For example, in cases where the investigation concludes without doubt that the allegations cannot be upheld or facts are beyond dispute (e.g. following admission in writing by the CSO or following a legal conviction).

iv) The CSO shall be given a minimum of five working days' notice of the interview, which will usually be undertaken remotely using the Agency's security compliant options or may be undertaken face to face.

v) Interviews will be recorded and the recording will be retained for two years from either the date that the investigation outcome letter is sent to the CSO or the outcome of an appeal letter is sent to the CSO, whichever is the latter. Recordings will be made available to the CSO on request. Transcripts of the recordings will be retained for ten years from the same start points.

vi) If the CSO wishes, they may be accompanied by one person to any interview at their own expense. This may be any person and can be a Union representative or an employee. The CSO must notify the investigator of the attendance and details of their companion no later than 72 hours before the appointed date of interview.

vii) The CSO may consult with their companion during the meeting. The companion does not have the right to answer questions on the CSO's behalf, address the meeting if the CSO does not wish it, or prevent the investigator from explaining the case.

viii) The Agency will treat all reports and other documents as confidential except that they may be shared with any other statutory body with a legitimate interest where such disclosure is authorised under relevant GDPR or other legislation or if criminal action or intent is evident or suspected.

ix) If the allegation raises concerns over the validity of the OCQ(AHP) - CSO qualification then the training provider will be notified so that they can consider the status of the qualification that the CSO has obtained.

52. The Agency shall notify the CSO's employer, as registered on the CSO's training record on the training provider's database, of the investigation.

53. The investigator may interview such parties as they consider fit and shall make every attempt to interview any persons suggested by the CSO who are considered to be relevant to the allegation made. Should the investigator fail to interview parties suggested by the CSO, the investigator shall give reason for such failure in any report produced.

54. The CSO shall cooperate with any reasonable request to assist the investigation, including the production of documents or attendance at an interview. Failure to comply will be considered as grounds for immediate suspension or revocation of authorisation.

55. In cases where the investigation identifies, at any stage, evidence of non-compliance with instructions or with the standards in this policy or of alleged misconduct, a Senior Veterinary Manager (not below Grade 6) can suspend the CSO's authorisation before the investigation is complete until the review panel has come to its decision. In such cases, the investigation will be completed and a review will be conducted without unreasonable delay on the part of APHA.

56. If, at any point, the investigator uncovers further issues that fall outside of the allegations stated in the letter of notification or any updates thereof, consideration will be given as to whether additional allegations must be added. If so, the CSO will be notified of the new allegations in writing as soon as possible.

57. The CSO will be given a draft of the investigator's report by email and invited to correct any factual errors or to make any relevant comments. The CSO will have 14 calendar days to do this and will be expected to respond by email to the person appointed to receive such communication. Upon request, the Agency may grant extra time to the CSO to review the report if there is reasonable justification provided the request is received in writing before the expiry of the 14-day period.

58. The investigator may decide that there is insufficient evidence to substantiate the alleged misconduct and recommend to the Veterinary Head of OV Regulatory Affairs or other Senior Veterinary Manager that the case is closed. If the Veterinary Head of OV Regulatory Affairs or Senior Veterinary Manager agrees, either they or the investigator will write to the CSO informing them of this.

59. The final report shall be forwarded to the review panel, other than where the case is closed as in paragraph 58.

## Decision of the review panel

60. A review panel will be appointed by the Veterinary Head of OV Regulatory Affairs or delegated Senior Veterinary Manager comprising two members, at least one of whom shall be an Agency MRCVS of Grade 6 and the other an official permanently employed by the Agency at a suitable level of seniority (Grade SEO or above). The investigator will not be a member of the review panel.

61. A member of the review panel will invite the CSO to a review panel meeting, which will usually be carried out remotely but may be carried out face to face. The CSO will be given at least five working days' notice of the date of the meeting. The CSO will be invited to make representations and given the opportunity to present any relevant mitigating factors. No expenses will be payable to the CSO for attendance at this meeting.

62. The CSO may be accompanied by one person of their choice at the review panel meeting but the cost of their companion attending the meeting will be at their expense. The CSO must notify the member of the review panel who invited them to the meeting, that they will be accompanied, providing details of the companion no later than 72 hours before the appointed date of the interview.

63. The review panel shall consider the investigator's report as well as any representations made by the CSO when making their deliberations.

64. The review panel may decide on any one or more of the following outcomes in proportion to their findings:

- i) The panel finds in favour of the CSO and no further action is required with restoration of authorisation, if suspended;
- ii) Written advice given to the CSO;
- iii) Retraining at the CSO's expense;
- iv) Suspension (or further suspension) of OCQ(AHP) - CSO authorisation
- v) Revocation of authorisation for a period of up to five years;
- vi) If applicable, referral to a relevant professional regulatory body (e.g. to the RCVS if the CSO is also a veterinary nurse), where there are grounds for concerns as to professional conduct;
- vii) Additional conditions such as undergoing retraining, or working under the direct supervision of a named OV or FCCO for a specified period of time;
- viii) Invalidation of relevant output where the review panel is sufficiently concerned that the CSO has not acted appropriately in performing the specific task;
- ix) Referral to the Local Authority or to the police if there is evidence that fraudulent or criminal acts may have been committed;
- x) Any other reasonable action that the Agency considers necessary.

65. In determining the outcome of the investigation, the review panel will consider previous training, performance and conduct as well as the facts of the specific case. Any records from the previous ten years will be reviewed. Professional misconduct, intentional or repeated non-compliance with CSO procedures would justify a long period of suspension or revocation of authorisation.

66. If the review panel decides that it is necessary to revoke the authorisation of a CSO and there has been a similar incident within the previous five years then they will normally decide on refusal to authorise as an OCQ(AHP) - CSO for five years from the date of the decision.

67. The review panel will normally make a decision and report the findings and decision to the CSO in a letter sent to their registered email address or by recorded delivery within five working days of the review panel meeting.

68. Copies of all the review panel documents will be sent to the APHA OV Team, Veterinary Head of OV Regulatory Affairs, Veterinary Director, APHA OV Team and APHA Regulatory Affairs, Compliance and Enforcement (RACE) Team.

69. A copy of the letter detailing the decision will also be sent to the investigator of the case, the regional Senior Veterinary Lead (G6 or above) in the region in which the CSO is registered as working and the Veterinary Head of International Trade. This will only be sent once the period of appeal as detailed in paragraphs 74 to 75 has passed and no appeal has been raised. If an appeal is raised, they will not be notified until the appeal has been decided.

70. An APHA Governance Board will review all cases at least annually.

71. If authorisation is suspended or revoked and the allegation raises concerns over the validity of the OCQ(AHP) - CSO qualification then the training provider will be notified so that they can consider the status of the qualification that the CSO has obtained.

72. The Agency will notify the CSO's employer, as registered on the CSO's training record on the training provider's database, of the outcome of the investigation.

## Appeals

73. Appeals are permitted on the following grounds:

- if procedural errors are suspected
- if new information/evidence is presented that may change the outcome of the original decision

74. Appeals to the final decision of the review panel shall be conducted as follows:

i) The appeal must be in writing and addressed to the Agency's Veterinary Director and sent by either:

- email to APHA Corporate Correspondence ([APHA.CorporateCorrespondence@apha.gov.uk](mailto:APHA.CorporateCorrespondence@apha.gov.uk)) or
- letter to the following address:  
Corporate Correspondence  
APHA Weybridge  
Woodham Lane  
New Haw  
Addlestone  
Surrey  
KT15 3NB

ii) It must be received within 28 calendar days of the date of the review panel's written communication detailing their findings and the outcome; and

iii) It must set out the grounds for appeal and include any relevant evidence.

75. The Veterinary Director may within 28 calendar days decide the appeal or on receipt of the appeal immediately appoint a Senior Veterinary Manager (not below Grade 6) who has not previously been involved in the case to decide the appeal on their behalf. The appointed person will have 28 days to decide the appeal.

76. If the CSO's authorisation has been suspended or revoked then this will continue during the 28-day period allowed for lodging an appeal and while the appeal is being considered.

77. The decision of the Veterinary Director, or the person appointed by them, is final.

## Restoration of authorisation

78. If the authorisation has been revoked due to the expiry of an OCQ(AHP) - CSO, which has not been revalidated on time as outlined in paragraphs 19 to 22, then full retraining will be required. Only after successful completion of retraining shall the CSO authorisation be restored. The CSO can apply to the Agency for permission to revalidate outside of the deadline. The Agency retains the right to grant or refuse permission based on the reasons provided for the request.

79. If authorisation has been suspended because the CSO is no longer under the direction of an OCQ(V) - PX authorised OV or authorised FCCO, then CSO authorisation may be restored when the CSO is assigned to another authorised OV or FCCO, to the extent that their OCQ(AHP) - CSO certificate is still valid.

80. If authorisation has been suspended or revoked and the review panel or appeals decision recommends restoration of authorisation, then authorisation will be restored to the extent that their OCQ(AHP) - CSO certificate is still valid. For the avoidance of doubt there will be no extension of the authorisation period.

81. When a CSO has had their authorisation removed as result of an investigation and a review panel decides that they can reapply for their authorisation at the end of the period set (maximum five years), their application for re-authorisation must be reviewed and approved by the Veterinary Director. The Veterinary Director will consider if following the period of removal, they are now fit to be a CSO.

82. If the review panel decides that there is no case to answer then their OCQ(AHP) - CSO will be reinstated automatically without referral to the Veterinary Director.

# Cessation of authorisation

## Resignation

83. If a CSO resigns from authorisation, a written or email confirmation must be sent to the Agency. If the CSO decides to resume CSO work, completion of the OCQ or re-validation will be required.

## Retirement

84. If a CSO intends to retire and no further work is to be carried out on behalf of the Agency, they must provide written or email notification to the Agency and indicate on their training record that they do not wish to revalidate the qualification.

## Death of CSO during appointment

85. Upon notification that a CSO has died the Agency will:

- update the training provider and Agency IT system with the details and
- request that the Official Stamp is returned or seek assurance that it has been destroyed.

# Annex 1: Legislation

## **Council Directive 96/93/EC of 17 December 1996 on the certification of animals and animal products**

### Article 2

1. For the purposes of this Directive:

‘veterinary legislation’ means the legislation listed in Annex A to Directive 89/662/EEC and Annexes A and B to Directive 90/425/EEC;

‘certifying officer’ means the official veterinarian or - in the cases provided for in veterinary legislation - any other person authorized by the competent authority to sign the certificates required by that legislation....

### Article 3

1. The authority shall ensure that certifying officers have a satisfactory knowledge of the veterinary legislation as regards the animals or products to be certified and, in general, are informed as to the rules to be followed for drawing up and issuing the certificates and - if necessary - as to the nature and extent of the enquiries, tests or examinations which should be carried out before certification.

2. Certifying officers must not certify data of which they have no personal knowledge or which cannot be ascertained by them.

3. Certifying officers must not sign blank or incomplete certificates, or certificates relating to animals or products which they have not inspected or which have passed out of their control. Where a certificate is signed on the basis of another certificate or attestation, the certifying officer shall be in possession of that document before signing.

4. Nothing in this Article shall prevent an official veterinarian from certifying data which have been:

(a) ascertained on the basis of paragraphs 1 to 3 of this Article by another person so authorized by the competent authority and acting under the control of the official veterinarian, provided that he or she can verify the accuracy of the data, or...where this is authorized under veterinary legislation.

## **Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules**

### Article 6

Staff performing official controls

The competent authority shall ensure that all of its staff performing official controls:

(a) receive, for their area of competence, appropriate training enabling them to undertake their duties competently and to carry out official controls in a consistent manner. This training shall cover as appropriate the areas referred to in Annex II, Chapter I;

(b) keep up to date in their area of competence and receive regular additional training as necessary.

## **WOAH Terrestrial Animal Health Code**

### Section 3. Quality of Veterinary Services

#### Chapter 3.1 Veterinary Services

##### Article 3.1.1.

The same fundamental principles should apply in countries where the responsibility for establishing or applying certain animal health or animal welfare measures, or issuing some international veterinary certificates, is exercised by an organisation other than the Veterinary Services, or by an authority or agency on behalf of the Veterinary Services. In all cases, the Veterinary Services retain ultimate responsibility for the application of these principles.

These fundamental principles are presented in Article 3.1.2. [of the Terrestrial Animal Health Code].



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