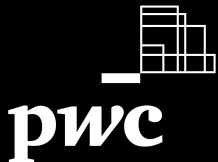




# Sea-Fisheries Protection Authority

Final Report - Review of the  
Organisational Capability of the Sea-  
Fisheries Protection Authority

April 2020



AN t-ÚDARÁS UM  
CHOSAINT  
IASCAIGH MHARA

SEA-FISHERIES  
PROTECTION  
AUTHORITY

# Transmittal Letter

Chairperson  
Steering & Oversight Group  
SFFPA Organisational Capability Review

2 April 2020

Dear Chairperson

**Subject: Review of the Organisational Capability of the Sea-Fisheries Protection Authority (SFFPA)**

Please find enclosed our final report.

Should any unauthorised person obtain access to, and read this report, by reading this report such person accepts and agrees to the following terms:

1. The reader of this report understands that the work performed by PwC was performed in accordance with instructions provided by our client and was performed exclusively for our client's sole benefit and use.
2. The reader of this report acknowledges that this report was prepared at the direction of our client and may not include all procedures deemed necessary for the purposes of the reader.
3. The reader agrees that PwC, its partners, principals, employees and agents neither owe nor accept any duty or responsibility to it, whether in contract or in tort (including without limitation, negligence and breach of statutory duty), and shall not be liable in respect of any loss, damage or expense of whatsoever nature which is caused by any use the reader may choose to make of this report, or which is otherwise consequent upon the gaining of access to the report by the reader. Furthermore, the reader agrees that this report is not to be referred to or quoted, in whole or in part, in any public or legal agreement or document and not to distribute the report without PwC's prior written consent.
4. In addition it should be noted, in preparing our report, PwC have relied upon data provided by the Sea-Fisheries Protection Authority (SFFPA). In all cases, PwC makes no representation in relation to independently auditing or verifying the accuracy or completeness of this information.

The Authority has checked the draft final report for accuracy and comments have been incorporated as we considered appropriate.

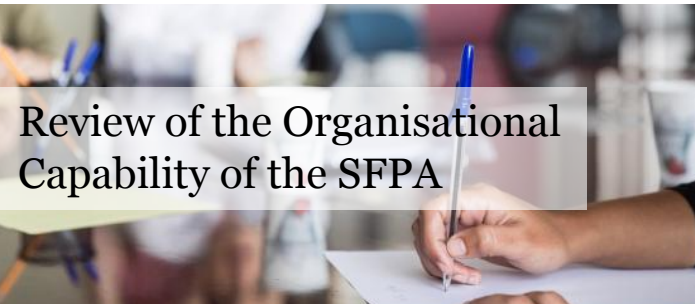
We would like to thank all personnel who assisted and facilitated us in carrying out this review.

Yours faithfully



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PwC



## Review of the Organisational Capability of the SFPA

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# 01

## Executive Summary

# Executive Summary

## Introduction

PwC was commissioned to undertake a capability review of the SFPA, Ireland's competent authority for Seafood Safety and Sea-Fisheries Protection. Although many reviews and internal audits have been completed since the establishment of the SFPA, this review is broader in nature and addresses six core themes (per scope):

1. Strategic management;
2. Organisational structure and design;
3. Internal structures and staffing arrangements ;
4. Industrial relation working environment and processes;
5. Learning and development; and
6. Internal and external communications.

The report was commissioned by the SFPA.

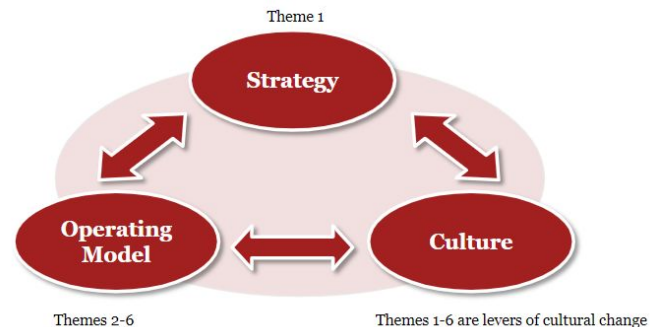
## Macro environment and critical requirements for change

This review focuses on identifying the actions which are necessary to strengthen the organisation in order to operate more effectively and efficiently. As an independent regulatory body, it should be acknowledged that the environment in which the SFPA operates is challenging and is influenced strongly by legislative and European Union (EU) requirements. The need for the review has been driven by a recognition that the SFPA could enhance its performance, improve management - staff relationships including the relationship between headquarters (HQ) in Clonakilty and the ports.

During this review process, the EU launched an Administrative Inquiry in 2019 following poor findings from a follow-up 2018 EU audit.

## Overview

**Figure 1: Strategy, Operating Model and Culture**



Strategy, Operating Model and Culture are all critical to the success of an organisation. All three must receive sufficient focus, clarity and effort, and they all need to be in alignment in order to work together effectively. Organisations cannot be truly effective if any one of these elements are in difficulty or out of sync with the others.

Our review of the SFPA has uncovered significant challenges relating to all three elements. Urgent action needs to be taken to address these individual challenges whilst bringing Strategy, Operating Model and Culture back into alignment with each other. The following pages highlight the key issues and recommendations relating to these, as well as highlighting some key action areas. Further detail on the background, findings and recommendations is contained in the main body of the report.

# Executive Summary

## Findings and Recommendations

### High level summary

The overall conclusion of this review is that the SFPA is not working effectively and requires urgent attention. Relationships and trust have been impacted by a range of issues, including some long standing industrial relations (IR) issues which have not been resolved. Trust was identified as an issue in the SFPA as far back as 2009 (Report of the Analysis of the Employee Opinion Survey of the SFPA carried out by Joe Wolfe & Associates). Relationships with various stakeholders, to lesser or greater degrees, are challenging. These issues are impacting performance and the organisation is not operating as a cohesive unit.

The SFPA, as an organisation, needs to be reset and unified with a clear and agreed articulation of its mandate. The SFPA needs to focus as a priority on its primary functions. In essence, the SFPA needs a clear focus on an accepted vision and core mission, with agreed objectives supported by its core expertise. This will need to be further supported by a clear and accepted framework of responsibility, accountability, behaviours and authority in order to drive management effectiveness as a matter of urgency.

A significant programme of change will be required across a range of areas and over the short, medium and longer term. In the short term, this will require the SFPA to reset the dial, both in terms of the strategic plan for the organisation and its interactions with staff and stakeholders. This is critical, as without establishing these essential building blocks it will be challenging to manage the SFPA in an effective manner to build on these foundations and further develop the SFPA over the medium to long term and deliver on core obligations.

### Strategy

*Develop a clear and accepted strategy focused on the core mandate*

While a strategy is in place, it is not a unifying one nor fully accepted by all. The starting point for the required change is the development of a strategy focused on the core mandate with an agreed set of objectives and action plans, but most importantly: key performance indicators which are meaningful and quantifiable. Such a strategy would set the tone for the organisational resetting and support the communications process through consistent messaging which is aligned with the revised strategy.

It is fundamental that this strategy is accepted and supported by key stakeholders, particularly staff. The strategy needs to be supported by a more effective business unit planning process, improved performance measurement and execution.

Core values should be reviewed as part of the review of strategy. It is important that values are clear, understood and staff feel empowered to use those values to call out both good and poor behaviours by reference to those values.

A redesigned Performance Management Development System (PMDS) should also support delivery of unit and overall SFPA objectives.

# Executive Summary

## Operating Model

*Identify and implement core processes, controls and reporting, aligned to a clear and appropriate organisation structure.*

The operating model within the SFPA requires significant and urgent attention. In summary, the SFPA lacks cohesiveness and there is a fundamental disconnect between the port offices and management in HQ. Port offices are operating with a degree of independence which has been influenced by a range of factors such as a lack of clearly defined Key Performance Indicators (KPIs), delays in data availability in relation to key work outputs, limited quality assurance of port work, disconnected systems and a lack of effective monitoring.

### Organisational structure and design

***A clear framework setting out authority levels, responsibilities and accountabilities capturing cross functional tasks is required.***

The strengthening of central support functions in recent years is a welcome development. While the organisation structure is documented and job descriptions are in place, the structure and roles and responsibilities (including decision-making rights) are not always accepted and / or respected and the inter-relationships between roles are not always understood or considered.

There is a disconnect between the port offices and headquarters which is in part caused by ineffective management control and a high level of individual port office autonomy. To address this, roles and responsibilities need to be re-established, reporting and monitoring improved and the inter-relationships between the roles need to be better defined. The SFPA should identify which roles are responsible for the performance of each activity, which roles are accountable, which roles need to be consulted, and which roles need to be informed. This will also be helpful to addressing silos and facilitating team-based and cross-functional working, balancing workload and defining responsibility for communication.

There is a need to strengthen management control overall and at the interface between the ports and headquarters. In the first instance, we recommend from a structural perspective:

1. Filling the vacancy at Authority level with this role focusing on operations.
2. Reinforcing the management role of the Senior Port Officer (SPO).
3. Considering a PO level appointment on a contractual basis to work on the implementation/transformation programme recommended in this report.

Some other HQ appointment may be necessary, including up to Principal/Assistant Principal level. The organisation structure / staffing is expected to evolve as the demands and impacts of Brexit emerge and are further quantified and the impact of any skills gaps emerging in key areas such as data analytics on the existing organisation structure are considered.

The relationship with the Consultative Committee is strained. The SFPA should agree a way of working with the Consultative Committee recognising the operational independence of the SFPA functions as set out in legislation.

# Executive Summary

In seeking to address the issues highlighted in this report, we note that the Authority does not have the support or direction of an independently established board. While the 2006 Act does not provide for such a board, and the Act itself is outside the scope of this review, establishment of an Advisory Board, nominated by DAFM, comprising members with expertise and/or professional experience in senior administration, public sector governance requirements and management, not related to the sectors regulated by the SFPA, to assist the management in strengthening the capabilities of the organisation, may be something that the parent Department may wish to consider, particularly given the nature and scale of the change programme envisaged in this report.

Additionally, the SFPA should:

1. Address the Sea Fisheries Protection Officer (SFPO) dual role issue - SFPOs to focus on one role. Dual role SFPOs are scheduled to spend 50% of their time on port duties with the balancing 50% on specialist desk based administrative duties in HQ.
2. Apply a consistent approach to the delivery of the electronic recording and reporting system/service (relevant to dual role);
3. Review the spans of control in the ports;
4. Adopt a portfolio management approach to cross functional work, and as a means of delivering on the change programme set out in this report.

## Operational Capability

***Operational capability is challenged with issues and shortcomings identified across the following areas - outputs and***

***targets, quality assurance, risk, workforce planning, information technology (IT) capability, data management/management information and people.***

The SFPA is not consistently meeting its targets across fisheries control and seafood safety. It is likely that efforts at improving compliance have been hampered by the slow progress of cases and delays in the introduction of a penalty points system.

The SFPA's operating model is not working and requires at least the following changes to operational capability:

- Clearly defined, agreed and consistently applied targets and outputs;
- Development, roll-out, monitoring and measurement of performance against standard operating procedures;
- Implement the planned Quality Management System (QMS) and establish and operate a quality assurance (QA) structure/team;
- A risk based approach embedded and evidenced in the inspection process;
- Assess data maturity, develop a data strategy and build data analytics capability and reporting focused on priority tasks and performance against targets on a timely basis;
- Reliable processes to collect and report on workforce productivity and performance data to inform fully integrated workforce planning;
- An IT strategy that is aligned to the Corporate Strategy with strengthened capability to deliver on this;
- Processes supported by fit-for-purpose systems; and
- Increased internal capabilities in the areas of risk, quality assurance, data analytics, programme management and technology.



# Executive Summary

## Industrial relation working environment and processes

*The principal IR issues must be addressed within an agreed framework and timeframe. A new agreed way of working together needs to be established.*

The SFPA needs to clearly identify the principal IR issues for resolution and agree routes to resolution of these issues and timelines for same with its parent department and government, as appropriate. The outcome of these consultations, negotiations or determinations may not be to the liking of all but must be addressed within a specific timeframe so that the organisation can determine where it stands with staff and then move forward.

It should be noted that the existing IR processes actually reflect good practice, albeit outcomes are lacking in that progress is not being made. An agreed protocol defining how staff and management should engage with each other is necessary. Staff at all levels have an important role to play in assisting the SFPA on this journey. Building trust and mutual respect will be critical.

## Learning & development (L&D)

*Learning and development should be enhanced to more directly support the SFPA's mandate*

The SFPA has invested in L&D, which is broadly regarded positively by staff. However, opportunities exist to ensure a more comprehensive and cohesive strategy/approach to L&D that supports the SFPA in achieving its strategic and operational goals. Training efforts should be guided by an organisation training needs analysis, as well as training requirements identified as part of the PMDS process.

Operational training should be clearly linked to requirements to achieve organisational objectives (e.g. training on new standard operating procedures (SOPs), new regulations, etc). In addition, the SFPA should consider general management skills requirements in key areas, in addition to the approach to inspections, programme management, technology, management training for new managers, and data analytics.

A Learning Management System (LMS) is recommended. Technology can also be used to support the delivery of training (e.g. online training and self-guided e-learning).

# Executive Summary

## Communications

***Communications is inextricably linked to delivering on an agreed strategy and addressing key IR issues. The role, purpose and content of communications needs to be defined and adhered to. Good communication helps to build trust.***

Communications arises as an issue in many organisations and a clear plan with defined objectives is important. Despite having strong guidelines, its application is an issue, particularly in relation to updating employees with management plans.

Improvements are required to address the effectiveness of various forums and the participation by staff in the various communications such that they foster trust-building. Communications relating to strategy (that is, focusing on the core mandate and how it will be delivered) and IR in particular, are essential. Staff should be involved in the conversation so that the methods of communication meet their needs. The plan must also be clear and concise. Communication is an essential component as the new fit-for-purpose organisation is established.

Improvements are also necessary so as to:

1. Enhance external communications with the industry
2. Utilise two way communication between the ports and Head Office
3. Communicate the (revised) agreed/accepted vision to staff
4. Revise the agenda for the Monday morning meeting.

# Executive Summary

## Culture

### *Identify, align and live the agreed values and behaviours*

It is clear from this review that the SFPA is at a critical point of inflection and significant transformation is required. Such a transformation will require support from the Authority, management, staff and key stakeholders to generate momentum to move forward in a time critical manner. Staff and management will need to work together to deliver on the transformation required.

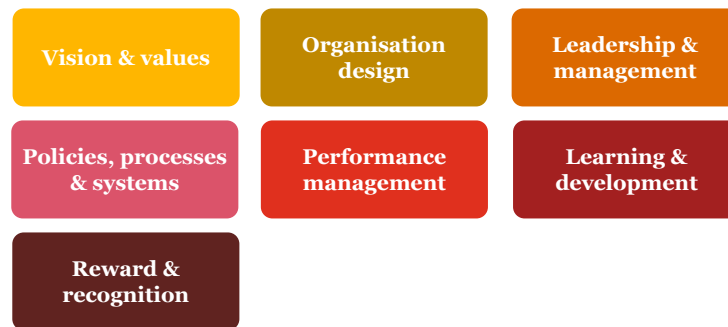
Culture is inherent in everything the SFPA does as opposed to being an abstract concept or standalone activity. Culture is one of, if not the, critical component in any organisational transformation. An organisation's culture is its basic personality, the essence of how its people interact, behave and work.

In order to bring about the necessary cultural change it is recommended the SFPA reappraise its values to ensure they are comprehensive and develop an aligned set of desired organisational behaviours.

The SFPA, through the Authority, must address behaviour which is not consistent with its values. Any deviation from the required standard of behaviour is not acceptable. There is a collective responsibility on all staff to uphold the values and follow organisational systems, processes and procedures.

There are a number of levers that can be used to achieve cultural change and reinforce the desired behaviours and values. The PwC model of cultural change identifies 7 cultural levers (per Figure 2) which are easily aligned to the six review areas/themes in this report (see main report) and confirm the importance of culture to bringing about change.

**Figure 2: Cultural Levers, PwC model of cultural change**



Once the strategic direction is clear, the SFPA should complete a cultural audit to identify the current cultural traits in the organisation. They should then consider how these traits inhibit or enable the achievement of organisation goals, and identify the critical behaviours to focus on to realise any necessary cultural shift. The culture audit will result in a baseline against which progress can be monitored over time.

# Executive Summary

## Phased Implementation Plan

We envisage a three phased implementation plan to reset the SFPA on what is a significant programme of renewal and refocusing. We have set out 46 recommendations in total. Recommendations may be grouped into projects for the purposes of execution.

**Table 1: Phasing for implementation plan - indicative**

Phase	Term	Months
1	Short term (including planning)	1-4 months
2	Medium term	5-8 months
3	Long term	9-18+ months

An Oversight Group will be needed to oversee delivery, supported by Portfolio Management Approach and an organisation wide Project Management Office to plan, monitor and enable implementation. The Oversight Group could be a subgroup of the Advisory Board and this is suggested for consideration.

**Phase 1 - Short term (1-4 months)** is largely about setting the tone and involves critical foundation building work covering key thematic areas in order to position the SFPA for subsequent phases. The recommendations in this phase focus on planning, strategy, organisation structure, industrial relations, communications and establishing governance mechanisms. A planning process should take place as part of the adoption of a PMO approach to implementation (recommendation M2 - page 14).

It will be important to develop a detailed integrated implementation milestone plan based on the key projects which will involve grouping recommendations together. This will take a few weeks to complete. A project initiation document is required for each project setting out the scope, activities, key deliverables, timescales, risks, issues, roles, governance, dependencies/interdependencies, budget, communications, etc.

**Phase 2 - Medium term (5-8 months)** is a resource intensive phase where much of the redesign work is finalised and projects to address recommendations are implemented. Recommendations in focus here include those relating to operational capability / operating model, implementing strategy, organisation structure and design and learning and development.

**Phase 3 - Long term (9-18+months)** is mainly about completing projects, operating effectively and monitoring to ensure delivery. These projects will take place during the period and not necessarily over the full period e.g. some current PMO/EMFF projects are likely to finish within the next year.

The SFPA is making progress in relation to a number of recommendations. Specifically, there are a number of projects already underway or about to commence, some of which are also relevant to addressing EU audit findings. These projects are referred to in the body of the report and include weighing at landing, national register for infringements, implementation of a QMS and Valid (data cross-checking). The continued delivery of these projects is essential. The recent Administrative Inquiry by the EU, combined with the issues identified in this report, points, in our view, to potential reputational risk if actions prove ineffective.

# Executive Summary

Below we set out indicative phasing for implementing the recommendations set out in this report, continued on the following page.

**Figure 3: Recommendations Timeline**

	Month	Short			Medium				Long										
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
<b>Strategy</b>																			
S1 - Reset and align mission, vision and objectives																			
S2 - Reappraise values																			
S3 - Define clear actions and meaningful and quantifiable KPIs																			
S4 - Ensure effective business unit planning, performance measurement and execution management																			
S5 - Redesign PMDS to align goals and recognise performance																			
S6 - Clarify accountability for risk management and reduce outstanding tracker items																			
<b>Organisational Structure &amp; Design</b>																			
OSD1 - Set out a clear framework of authority, responsibility and accountability across cross-functional tasks																			
OSD2 - Review span of control in the ports																			
OSD3 - Review of operating model																			
OSD4 - Consider Advisory Board with external experience																			
OSD5 - Reconfirm / define SFPA relationship with the Consultative Committee																			
OSD6 - Strengthen management control at port level																			
OSD7 - Address dual role SFPO issue																			
OSD8 - Apply consistent ERS model across regions																			
OSD9 - Implement portfolio management approach across the organisation																			
OSD10 - Establish model of team-based working																			
OSD11 - Keep Brexit staffing under review																			
<b>Operational Capability</b>																			
<i>Inspection Outputs and Targets</i>																			
OC1 - Define, measure, analyse and report on inspection outputs & targets																			
<i>Quality Assurance</i>																			
OC2 - Implement Quality Management System																			
OC3 - Establish quality assurance structure / team																			
<i>Risk Assessment</i>																			
OC4 - Integrate risk assessment into inspection process																			
OC5 - Ensure risk assessment process is properly developed, maintained, managed & monitored																			
OC6 - Continue to implement 'Valid' project																			
<i>Workforce Planning Capability</i>																			
OC7 - Establish evidence based workforce planning																			

# Executive Summary

Following on from the previous page, below we set out indicative phasing for implementing the recommendations set out in this report.

**Figure 3 Cont'd: Recommendations Timeline**

	Month	Short			Medium				Long										
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
<b>IT Capability</b>																			
OC8 - Define role and establish a strategy for IT																			
OC9 - Document business unit plan and develop internal IT management capabilities																			
OC10 - Define skills gaps to transition to new IT operating model																			
<b>IT Capability - systems</b>																			
OC11 - Implement case management and documentation management systems																			
OC12 - Implement key systems projects including the Iinspect & Crosschecks projects																			
<b>Data Management</b>																			
OC13 - Perform data maturity and management assessment																			
OC14 - Document data strategy																			
OC15 - Develop data analytics																			
<b>People Matters</b>																			
OC16 - Address resourcing requirements																			
OC17 - Complete cultural audit																			
<b>Industrial Relations</b>																			
IR1 - Clarify SFPA's decision-making remit with DAFM and timelines to solve IR issues																			
IR2 - Reconfirm escalation channels within IR framework																			
IR3 - Define and monitor IR protocol																			
<b>Learning &amp; Development</b>																			
LD1 - Agree L&D strategy (align to organisational goals)																			
LD2 - Complete / revise training needs analysis																			
LD3 - Procure new learning management system																			
<b>Communications</b>																			
C1 - Clarify internal communications mechanisms, follow up and monitor against policy																			
C2 - Enhance communication between head office and the ports																			
C3 - Revise and implement Monday morning meeting agenda																			
C4 - Consider most appropriate communication channels for interacting with fishermen at ports																			
<b>Management of Change</b>																			
M1: Establish Oversight Group																			
M2: Adopt a PMO approach																			

# 02

## Introduction

Overview of SFPA

Terms of Reference

Our Approach

# Overview of SFPA

The SFPA is Ireland's competent authority for **Seafood Safety** and **Sea-Fisheries Protection**. The SFPA is an independent, statutory non-commercial public body under the aegis of Department of Agriculture, Food and the Marine (DAFM) established through the provisions of the Sea-Fisheries and Maritime Jurisdiction Act 2006. Its functions are described under Section 43 of that Act, and summarised below along with the wider coordination role performed under EU Regulation 1224 of 2009.



## Enforcement and detection

- The SFPA is directly responsible for the efficient and effective **enforcement** of sea-fisheries and food safety law as well as the **detection** of any non compliance with specified regulatory frameworks. The Naval Service and Air Corps carry out fisheries control at sea on behalf of the SFPA under a Service Level Agreement (SLA) with the Department of Defence DoD). The SFPA carries out food safety responsibilities under an SLA with the Food Safety Authority of Ireland (FSAI).



## Promotion, education and information

- There is an emphasis on **promoting compliance** and **detering contraventions** of the regulations through the provision of information on relevant legislation directly to the sea-fisheries and seafood sectors or through the Consultative Committee established under section 48 of the Act.
- **Collection of data for analysis and reporting** is also permitted under this section of the Act.



## Policy, advice and representation

- Under the Act, the SFPA is recognised as the competent authority to **advise the Minister** for Agriculture, Food and the Marine in relation to **policy** on the effective implementation of sea-fisheries and food safety law. They will also **represent** the State at national, community and international fora pertaining to the implementation of such laws.

## The Authority

At the helm of the SFPA is an Authority, which under the Act comprises of between one and three members, including the Chairperson. Until 1 September 2019 there were three members of the Authority. One of these members has now been appointed to the role of Brexit Lead and Chief Scientific Advisor at Principal Officer grade, meaning that the Authority currently comprises two members, with a vacancy for a third member. The Authority is independent in the exercise of its functions and has all such powers as are necessary for or incidental to the performance of its functions.

## Sea-Fisheries Consultative Committee



There is also a Sea-Fisheries Consultative Committee, consisting of 14 members representing the sea-fishing catching, inshore fishing, seafood processing and aquaculture sectors and others with relevant marine expertise who are appointed by the Minister for Agriculture, Food and the Marine.

For an extended overview of the SFPA, please see Appendix 1. A list of the principal stakeholders is set out in Appendix 2 and reflects the complexity of the wider environment within which the SFPA engages.



# Terms of Reference

## Purpose of Review

The principal objective of the Organisational Capability Review Report & Recommendations is to contribute to the ongoing and future development of the SFPA so that it is recognised as an agency of excellence and role model for other agencies.

## Key areas of focus

The scope of the review will be focused on an assessment of the core areas of:

1. strategic management
2. organisational structure and design;
3. internal structures and staffing arrangements (operational capability);
4. industrial relation working environment and processes;
5. learning and development; and
6. internal and external communications.

## Key deliverables

1. The provision of a draft report for review by the Steering & Oversight Group with recommendation(s) and an associated change management and implementation plan in respect of each of the above core areas.
2. The provision of a final report with recommendations and an associated change management and implementation plan in respect of each of the above core areas.

## Engagement process

To include:

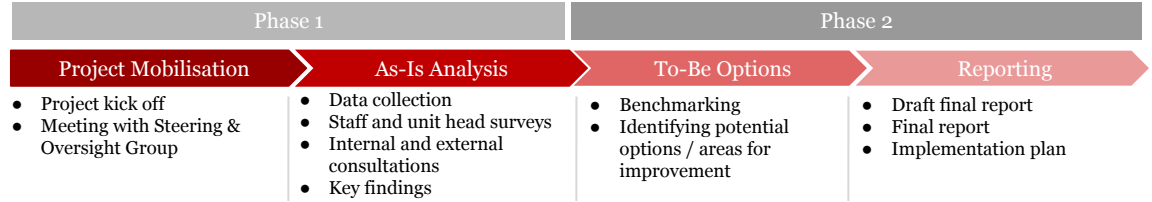
- One-to-one consultations with each member of the Authority;
- Engagement with Senior Management and Joint Management Team (JMT);
- One-to-one consultations with SFPA Director of Finance and Director of Human Resources (HR); and
- Consultations with staff at all grades across the organisation.

## Governance of the review

A Steering & Oversight Group comprised of three senior and expert persons all independent of SFPA has overseen the review.

## Our Approach

*This report is the final report.*



At a high level, there are essentially three key questions...



1. Is the **strategy** broadly correct and appropriately focused?
2. Does the SFPA have an **appropriate structure and staffing model** in place to deliver on its strategy?
3. Are the **key enablers** - strategic management, industrial relations, communications, operational capability, and learning and development- working effectively and supporting the achievement of 1 and 2 above?

### Staff and management (Head of Function)

The staff survey was completed by 57 staff. The management survey was completed by 13 managers (unit/function heads). The results of both surveys have been considered in our findings. A summary of the findings of the two surveys is set out in Appendix 3.

### Consultative Process



#### Internal

- Staff consultation (workshops and surveys)
- Individual Authority members
- Senior Management Team (SMT)
- Director of Finance and Director of Human Resources (HR)
- Consultative Committee
- Audit and Risk Committee.

#### External

- DAFM
- DoD, Naval Service and Air Corps
- FSAI
- Fórsa and staff representatives. Fórsa also made a written submission.
- Various external stakeholders including Bórd Iascaigh Mhara (BIM), Inland Fisheries Ireland (IFI) and the Marine Institute
- European Fisheries Control Agency (EFCA).

See Appendix 4 - Interviews and workshops conducted.

# 03

## Executive Report

1. A Macro Perspective

2. Strategic Management

3. Organisational Structure  
and Design

4. Operational Capability

5. Industrial Relations

6. Learning and Development

7. Communications

8. Conclusions & Next Steps

## 1. A Macro Perspective

### Introduction

This section covers the following key areas/themes:

1. Strategic management;
2. Organisational structure and design;
3. Internal structures and staffing arrangements (operational capability);
4. Industrial relations (including working environment and processes);
5. Learning and development; and
6. Communications.

Each theme is examined in turn with the as-is, key findings and recommendations set out.

As part of our consultation with staff, we administered two surveys seeking views on a range of topics influencing how the SFPA works to achieve its aims, and how they experience their roles in the organisation, respectively. There were 57 responses to the staff survey and 13 responses to the unit head survey. The findings and issues arising from the surveys were considered within each of the relevant sections covering the six key themes above.

### Drivers of this review

The need for the review has been driven by a recognition that the SFPA could enhance its performance, improve management - staff relationships including the relationship between headquarters (HQ) in Clonakilty and the ports.

This review highlights that the SFPA, as an independent regulatory body operating in a complex and legislative environment, has a number of key challenges which must be addressed. It is evident too that addressing these challenges will require a multi-stakeholder approach.

## 2. Strategic Management

### Introduction

The SFPA is guided by its **Strategy Statement 2018-2020**, which sets out how it will fulfill its mandate to 2020, taking account of the environment in which it operates, the challenges and significant opportunities facing the sea-fisheries and seafood sectors, as well as legislative change. The SFPA also has an Oversight and Performance Agreement in place with DAFM.

The SFPA's Statement of Strategy is set by reference to the following vision: *“Seas full of fish, coasts full of jobs.”*

In its stated mission, the SFPA *“is committed to the effective and fair regulation of the sea fishing and seafood sectors that fall within our mandate in order to support safe and sustainable seafood. This means the fair regulation of all fishing vessels operating within Ireland's 200-mile limit and Irish fishing vessels wherever they operate and all seafood produced in Ireland.”*

### Strategic Planning


The Authority has adopted varying approaches to strategic planning over the years, as shown below:

#### Statement of Strategy    Strategic planning approach adopted

**2008 - 2011**  **Top down** - This was developed by the Authority with minimal staff consultation.

**2012 - 2014**  **External facilitation** - This was developed by the Authority with external consulting support.

**2015 - 2017**  **Consultative** - The 2015 strategy was developed by the Authority following a broad consultation process with internal staff and external stakeholders, including the Consultative Committee and external agencies in Ireland and Europe.

**2018 - 2020**  **Evolutionary** - The 2018 strategy was based on the 2015 - 2017 strategy (with the four key strategic pillars maintained) and was revised and restructured following stakeholder and internal staff consultation.

The process of preparing the SFPA's next statement of Strategy will begin in 2020.

### Strategy Implementation and Monitoring

The SFPA's Statement of Strategy is intended to be implemented through the development and execution of annual business plans at function and unit level, which are mapped back to the Objectives, Actions, Outcomes and KPIs published in the Statement of Strategy. At an Authority level, the following strategy evaluation and monitoring activities take place:

- Strategic implementation is a standing item at Authority Governance meetings.
- There are quarterly updates according to the Oversight and Performance Agreement which outline actions taken during that period against each Strategic Objective.
- The SFPA's Annual Report outlines the detailed activities of the SFPA for that year.

## 2. Strategic Management

### Strategic Management Capability

Strategic management, as a capability, defines an organisation's ability to provide a framework which guides all its business activities over the medium and longer term.

In assessing the strategic management capability of the SFPA, we have used the following guiding questions:

- Is there a clear, compelling and coherent vision for the future of the organisation?
- Does the organisation have a clear, coherent and achievable strategy with a single, overarching set of challenging outcomes, aims, objectives and measures of success?
- Is the culture a reflection of the organisational values?
- Does the organisation develop and generate common ownership of the strategy?
- Does the organisation evaluate and measure outcomes and ensure that lessons learned are fed back through the strategy process?
- Is individuals' performance managed transparently and consistently, rewarding good performance and tackling poor performance? Are individuals' performance objectives aligned with the strategic priorities of the organisation?

### Structure

The structure of this section is as follows:

**Introduction:** Overview of the SFPA's strategic management framework.

**2.1 Specification and alignment of the organisation's mission, vision and objectives:** The degree of alignment between the SFPA's vision, mission and strategic objectives.

**2.2 Values:** The extent to which the organisational values have been defined and are being practised.

**2.3 Strategic planning:** The effectiveness of the SFPA's strategic planning process and the quality of its Statement of Strategy 2018-2020.

**2.4 Performance measurement and execution management:** The extent to which performance measurement and execution management is implemented.

**2.5 Individual performance measurement and alignment with the strategic priorities of the organisation:** The process by which individual performance is currently measured and the degree of alignment with the strategic priorities of the organisation.

**2.6 Management of risk:** The effectiveness of the existing risk management processes.

## 2. Strategic Management

### 2.1 Specification and alignment of the organisation’s mission, vision, and objectives

Established under the provisions of the Sea-Fisheries and Maritime Jurisdiction Act 2006, the SFPA is Ireland’s competent authority for **seafood safety** and **sea-fisheries protection**. However, throughout this review, differing views emerged as to what the vision, mission and strategic goals of the SFPA should be.

Some stakeholders suggested that the SFPA’s guiding vision of “*Seas full of fish, coasts full of jobs*” is **not consistent** with its core legislative mandate and queried whether the SFPA is straying into activities that are potentially misaligned with the enforcement agenda of the organisation. In particular, there has been concern that the SFPA is diversifying into trade and marketing activity.

The perceived “mission drift” / diversification outside of the core mandate has generated internal criticism from a workforce who have expressed concern that the Authority is being distracted by non-core tasks with the impact of diluting energy and attention from the key issues.

#### **Finding: SFPA’s vision**

The SFPA’s vision is not accepted by all stakeholders and the perceived “mission drift” has given rise to a lack of clarity around the purpose of the organisation.

### Recommendation(s)

#### **S1 - Reset and align mission, vision and objectives**

As a matter of priority, and in consultation with stakeholders, the SFPA needs to be reset and unified with a clearly communicated and agreed interpretation of its mandate. The SFPA should develop an accepted vision and mission in order to create a shared sense of purpose and identity for the organisation. This means that the strategy must be accepted and supported by key stakeholders, particularly staff.

### 2.2 Values

The values of the SFPA, as set out in the organisation’s Code of Conduct, are integrity, probity, transparency, accountability, and fairness. Values underpin behaviour and are the core of an organisation’s culture.

#### **Finding: SFPA values**

While the SFPA has set out its values, they are **not resulting in the required behaviours in all cases e.g. this review identified issues of lack of accountability, silos, amongst others.**

### Recommendation(s)

#### **S2 - Reappraise values**

The SFPA needs to reappraise its values to ensure they are comprehensive and aligned with the desired organisational behaviours. The SFPA, through the Authority, must address behaviours that are not consistent with its values and standards. All staff have a responsibility in this regard.

## 2. Strategic Management

### 2.3 Strategic planning

The development process for the current Statement of Strategy 2018 involved both an internal and external consultation process, with the strategic objectives under the four pillars from the previous Statement of Strategy revised and restructured based on this process.

Notwithstanding the lack of clarity around the purpose of the organisation, the SFPA's current Statement of Strategy is considered too high level. KPIs are often general and not quantified e.g. the KPIs underpinning the strategic goal of enforcement are articulated as general compliance rate increases, rather than specifically identified targets.

Staff demonstrated a very generalised understanding of the strategic objectives of the organisation.

Under the 2006 Act, the Authority is required to submit to the Minister a statement of strategy within 3 years from the submission date of the first statement.

#### **Finding: SFPA Statement of Strategy**

The SFPA's current Statement of Strategy is too high level which limits its practical value and makes it difficult to identify the specific actions needed to deliver on its mandate.

Furthermore, there is an emerging need to refresh the Statement of Strategy to ensure greater alignment and buy-in from stakeholders who have become disengaged.

#### **Recommendation(s)**

##### ***S3 - Define clear actions and meaningful and quantifiable KPIs***

Refresh the SFPA's current Statement of Strategy with a view to ensuring it outlines clear actions and provides greater practical guidance as well as meaningful, appropriate and quantifiable KPIs as relevant to the SFPA's legislative mandate.

The Strategy should be:

- More detailed than the normal published document in a public environment and be of sufficient detail to ensure stakeholders can have a clear view of what is required.
- Underpinned by adequate levels of consultation, both internal and external, as part of this process so there is full engagement. Staff need to be involved in the communications strategy for the delivery of the plan and for any key change projects/programmes which should be measurable.



## 2. Strategic Management

### 2.4 Performance measurement and execution management

The strategic objectives, actions, outcomes and KPIs set out in the SFPA's Statement of Strategy 2018-2020 are intended to be cascaded through the development of annual business plans at the business unit level, which business unit leaders are expected to report against quarterly.

While there is a business planning process which is intended to provide the link between the business unit and the strategic plan, this intended process is not operating to great effect for a number of reasons. For example,

- It does not appear that business plans are prepared for all units;
- Inconsistency in approach to completion;
- Many of the KPIs set out in the business plans are not meaningful or are unquantified.
- The budget and business plan processes are not aligned in timing. Budgets are completed in Q3 for the following year; business plans are due at the end of the year. This can create barriers to implementation of planned activities;

This presents challenges for staff in seeing the link between the SFPA strategic plan and the individual business unit plans and buying into both, as well as challenges for the effective implementation, monitoring and challenge of the strategy and statutory obligations by Senior Management.

External reporting to DAFM on a quarterly and annual basis is based on the SFPA's Statement of Strategy 2018 - 2020 and therefore subject to similar limitations as identified previously. While strategic objectives, actions, outcomes and KPIs are outlined, updates to DAFM are provided by means of an overall narrative and it is difficult to clearly link this to the objectives, actions, outcomes and KPIs to assess performance.

#### **Finding: Effective performance measurement and execution management**

While there is a business planning process in place, it is not operating effectively.

The measurement and monitoring of strategy execution is being stifled by an inconsistent approach to the annual business planning process, and a lack of specific and meaningful KPIs.

Many of the business units are not sufficiently focused towards specific goals or targets and it is therefore difficult to assess their effectiveness; the information which would support this focusing is frequently unavailable, or, if available, under-utilised.

At an organisation level, external reporting to DAFM by means of an overall narrative does not lend itself towards effective performance measurement and execution management.

## 2. Strategic Management

### Recommendation(s)

#### S4 - Ensure effective business unit planning, performance measurement and execution management

Business planning should align the relevant functional areas of the SFPA for a holistic, group-wide view of performance and effectiveness of the overall strategy. To achieve robust and real alignment, buy-in and a culture of sharing and collaboration is critical. Furthermore, enhanced business planning and performance measurement at a business unit level will assist with overall reporting to DAFM.

We recommend that:

- All business unit leaders be held accountable for the development of annual business plans for their units and for reporting actual performance against plan on a periodic basis.
- The template for business plans be reviewed in the context of a revised strategic plan. This template should be sufficiently tailored to the relevant business units that it is meaningful to those tasked with delivering it, while also prompting the individual business units to consider dependencies between the business plans of other units.
- The budget and business planning horizons be aligned going forward to better facilitate the implementation of planned activities.

### 2.5 Individual performance measurement and alignment with the strategic priorities of the organisation

The SFPA employs the PMDS utilised in the public sector. PMDS was reintroduced in 2018 and completed by all staff. The SFPA PMDS process follows the 2-point rating scale agreed with the representatives of civil service management and the staff unions at the General Council Subcommittee on PMDS. A recent internal audit report (Staff Performance and Development Internal Audit, August 2019) found that *“the output from the PMDS process is a two-rating system which does not allow for the distinction between high and adequate performance”*.

While we understand that unsatisfactory performance is linked to reward (staff with an unsatisfactory performance rating do not receive planned increments), the vast majority of staff are rated as ‘satisfactory’ and the two rating system currently in place (satisfactory and unsatisfactory) does not allow the SFPA to distinguish high performers. This can have adverse implications for staff morale and does not encourage high performance.

Additionally, the internal audit review noted some other issues, specifically:

- The need for evidence based assessments of performance; and
- The need to *“provide a basis on which performance can be clearly assessed against Public Appointments Service (PAS) Civil Service Competency Framework”*.

## 2. Strategic Management

The PMDS form is based on the standard PMDS form for the civil service, and is not linked to the SFPA's overall strategic goals or to the strategic goals of individual business units. While not evident from the sample PMDS provided for review, the guidelines set out by the Department of Public Expenditure and Reform for HR Management state that goals should be reviewed for alignment with the key priorities set by management for the organisation as a whole. To date, the focus of the PMDS process has been exclusively on the identification of learning and development needs by the individual and the manager. PMDS is not being used as a tool to link individual objectives to organisation strategic objectives.

### **Finding: Individual performance measurement**

As a performance management system, the existing PMDS does not appear to be meeting organisational needs to the extent that it is not aligned with the SFPA's annual business planning process; nor does it allow for distinction between high and adequate performance.

### **Recommendation(s)**

#### **S5 - Redesign PMDS to align goals and recognise performance**

We recommend the implementation of a PMDS which aligns individual goals with organisation objectives and allows for a distinction between high and adequate performance.

### **2.6 Management of risk**

The SFPA has a Chief Risk Officer in place and maintains a risk register of the strategic risks facing the SFPA and the actions required to mitigate against those risks. The strategic risk register is used by the Authority and the Senior Management Team (SMT) to inform decision making and is a standing item at both Authority and SMT meetings. In addition to this, actions arising from audits to which the SFPA is subject are managed via a central action tracker designed to capture all the actions that are on-going, enable a central point of oversight and assignment of responsibility, and allow for the monitoring and reporting of progress of those actions. The action tracker was established in an effort to manage and progress the SFPA's large number of open audit findings. Progress is reported on a quarterly basis.

There are a large number of actions awaiting closure per the action tracker dated June 2019 (150+), which suggests that the organisation is struggling to close out on recommended actions. While the tracker identifies risk ratings, due dates and owners for actions, this information is not complete for all actions contained in the tracker, which is a barrier to effective management of the action tracker that should be addressed.

## 2. Strategic Management

The SFPA's risk management process and risk appetite are both documented and available to inform the management of risk by the SFPA.

The Audit and Risk Committee has oversight of the risk agenda and utilises both the strategic risk register and the central action tracker as a tool for oversight and to challenge management on the progress of actions and close-out of open audit items. This may include calling management to present at committee meetings.

### **Finding: Risk management framework**

The central action tracker contains a large number of outstanding actions, many high risk items remain open, and there does not appear to be a consistent approach to risk classification.

### **Recommendation(s)**

#### **S6 - Clarify accountability for risk management and reduce outstanding tracker items**

The SFPA needs to develop a system to reduce the number of outstanding items and ensure a more consistent approach to risk classification. Given the different stakeholder involvement in the SFPA risk management process (Authority members, SMT, Chief Risk Officer, Audit & Risk Committee), the roles and responsibilities of the relevant parties should be clarified and incomplete information observed in the central action tracker should be addressed to strengthen accountability for addressing risk.

## 3. Organisational Structure and Design

### Organisation Structure and Design Capability

Organisational structure and design is about creating the most appropriate organisational architecture to enable the achievement of the business strategy. It involves setting the role for all units, both central and operations. It also involves defining the organisational chart and roles and responsibilities at each level, to provide a clear understanding of accountabilities.

In assessing the organisational structure and design capability of the SFPA, we have used the following guiding questions:

- Is there a formal, documented organisational structure?
- Are roles and responsibilities clearly defined and understood?
- Are the accountabilities, lines of authority and decision making structures in place?
- Does the structure, cover both operational and central functions, and align with the strategy?
- Are staff functioning in a team based environment?

### Structure

The structure of this section is as follows:

#### SFPA Organisation Chart

**Introduction:** Overview of the SFPA's organisational structure and staff growth in recent years.

**3.1 Organisation structure, roles and responsibilities:** The level of organisation structure clarity and alignment of organisational wide roles and responsibilities.

**3.2 Specific operational roles:** Alignment of SPO and (the range of) SFPO roles to organisational need.

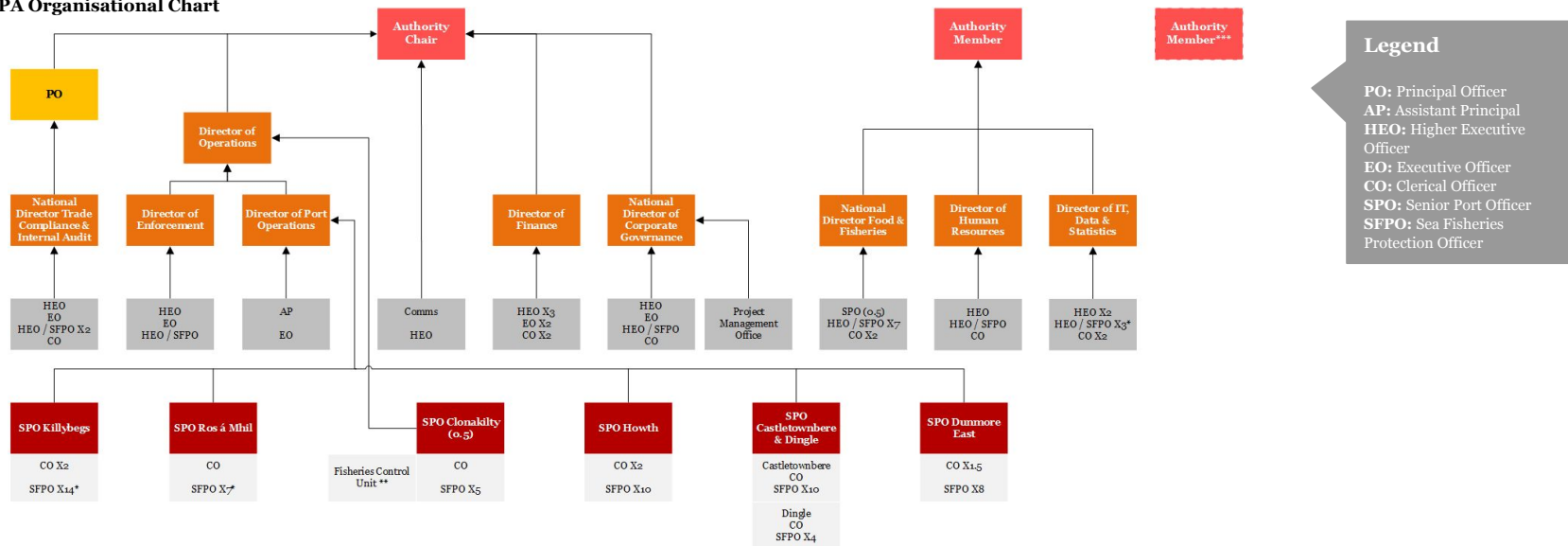
**3.3: Central functions and silos:** This refers to central functions, areas of challenge and a tendency to operate in silos.

### 3. Organisational Structure and Design

#### SFPA Organisation Chart

There has been considerable staff growth and change to the organisation structure (see overleaf) in recent years. The organisation structure for permanent staff (excluding 2 contract / European Maritime and Fisheries Fund (EMFF) posts based in the PMO and 2 on secondment from DAFM - EO/PA to the Board and EO in HR/Health & Safety) as of the 1st of October, 2019 is as follows:

Figure 4: SFPA Organisational Chart



**Legend**

- PO: Principal Officer
- AP: Assistant Principal
- HEO: Higher Executive Officer
- EO: Executive Officer
- CO: Clerical Officer
- SPO: Senior Port Officer
- SFPO: Sea Fisheries Protection Officer

\*Note: Includes one staff member on Electronic Recording & Reporting Systems (ERS) project on a full time basis.

\*\*Note: The Fisheries Control Unit positions remain vacant as per the most up to date organogram (12/08/2019).

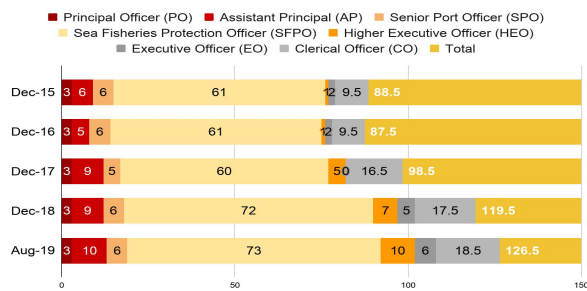
\*\*\*Note: Until 1 September 2019 there were three members of the Authority. One of these members has now been appointed to the role of Brexit Lead and Chief Scientific Advisor at Principal Officer grade, meaning that the Authority currently comprises two members, with a vacancy for a third member. In the absence of this role being filled, the functions of the third Authority member have been transferred to the other two.

### 3. Organisational Structure and Design

#### Introduction

The staff headcount in August 2019 totalled 126.5 against 88.5 in December 2015. This amounts to a 43% increase in actual headcount. Additionally, since August 2019, and due to Brexit, another four SFPOs, one Principal Officer, one HEO and two EOs (due) have been recruited. This brings the overall increase in staff due to Brexit to 25 of which there are 20 new SFPOs. An additional eight staff have also been sought for Brexit.

**Chart 1: Staff headcount by grade December 2015 to August 2019**



Source: SFPA Grade Breakdown, 2019

The grades which have witnessed the most significant growth in staff numbers are at HEO, EO, CO and AP level, particularly at HEO level (see Table 2). Most of the growth has been in HQ. Given the number of grades (CO, EO, SFPO and SPO) operating at port level, there is limited opportunity for progression locally and staff may need to apply for roles in Clonakilty to progress to a more senior role. Furthermore, there are several members of staff currently in receipt of pensions who would lose their current pension benefit on promotion, resulting in an overall reduction in their total remuneration.

**Table 2: % Growth by grade December 2015 to August 2019**

Headcount by Grade	% Growth
Principal Officer (PO)	0%
Assistant Principal (AP)	66%
Senior Port Officer (SPO)	0%
Sea Fisheries Protection Officer (SFPO)	20%
Higher Executive Officer (HEO)	900%
Executive Officer (EO)	200%
Clerical Officer (CO)	95%
Total	43%

Source: SFPA Grade Breakdown, 2019

There has been considerable growth across the central functions in recent years. The staff headcount in August 2019 totalled 53.5 as against 28.5 in December 2015. This amounts to an 88% increase in actual headcount. There has also been growth within the port offices with a 22% increase in actual headcount over the same period. The below table identifies the top 5 areas of growth within the organisation from December 2015 to 2019. The major growth areas within the SFPA are all part of the central functions unit.

**Table 3: % Growth by Function vs. Port December 2015 to August 2019**

Area	Dec -15	Aug -19	% Growth
Central functions	28.5	53.5	88%
Port offices	60	73	22%
Top 5 % Growth Areas			
	Dec -15	Aug -19	% Growth
HQ - HR	0	3	300%
HQ - Enforcement	1	4	300%
HQ - Finance	3	9	200%
Clonakilty - Operations	1	3	200%
HQ - Corporate Affairs	2	5	150%

Source: SFPA Grade Breakdown, 2019

### 3. Organisational Structure and Design

#### Introduction (cont'd)

The SFPA has made a number of new appointments in recent years reflecting key areas of focus for the Authority and a strengthening of services at the centre.

#### 2015



**Director, I.T., Data & Statistics** - This role reflected the need to formalise the IT structure and to place the function on a more solid basis for engaging with DAFM.



**Director, Trade, Compliance & Internal Audit** - This role reflected the increased focus and resourcing of trade activities such as the issuing of health certificates for consignments being exported, as well as an effort to manage and progress the SFPA's large number of open audit findings.

**Overarching Rationale:** *Strengthen the management structure to develop key central support service areas.*

#### 2017



**Director, Enforcement** - The enforcement area required focus along with enhancements to the how the Director of Public Prosecutions (DPP) supported the SFPA.



**Director, Port Operations** - The need to support the Director of Operations whose area of responsibility was wide-ranging.



**Director, Food & Fisheries Support** - This role changed in 2017 from “*Director, Food Support*” to “*Director, Food & Fisheries Support*”. The food policy area, which had a stable staffing structure with staff focused on the area, was regarded by staff as a good model. The Authority sought to replicate this in the fisheries area through a new combined role.

**Overarching Rationale:** *Strengthen policy and central function areas with an operational focus.*

#### 2019



**Principal Officer, Brexit Lead and Chief Scientific Officer/Data Analytics** - This role combines two areas which are pressure points currently and likely to continue to require senior resource going forward.

**Overarching Rationale:** *Strengthen the structure in areas undergoing development such as Brexit or in areas of identified weakness such as data quality and data analytics.*



## 3. Organisational Structure and Design

### 3.1 Organisation structure, roles and responsibilities

The organisation structure chart is known to staff and broadly aligned to the SFPA's Strategy Statement 2018-2020. As noted, changes to the structure and increases in staffing have strengthened the centre. While there have been concerns about the frequency of the number of changes and the method by which staff may learn of these changes, the chart is clear.

Despite the organisation chart and job descriptions, which underpin the organisation structure, there is confusion as to where actual responsibility, authority and accountability lies. This means that:

- Delineation between management decisions and Authority decisions is not clearly understood and decision making is not always made at the most appropriate level of the organisation, leading to escalation of decision points to members of the Authority.
- Decisions may be taken without reference to or engagement with the relevant managers.
- Two or more staff may feel they are tasked with the same task.
- There is confusion as to the lead person in relation to a specific task or project.
- People work in silos and fail to understand the linkages with other staff members.
- Ports work somewhat in isolation from the centre.

The span of control within the organisation is variable, ranging from 1:8 full-time equivalents (FTEs) to 1:16 FTEs at port office level. The span of control is lower for central functions ranging from 1:1 FTE to 1:9.5 FTEs. Higher spans of control might be expected at port level given that SFPOs are warranted officers when qualified and conduct their work in an independent manner.

A span of control that is too high may present challenges for the effective management of teams, while a span of control that is too low might not result in the most effective use of resources.

#### **Finding(s): organisation structure, roles and responsibilities**

1. While the organisation structure is documented and job descriptions are in place, the structure and roles and responsibilities (including decision making) are not always accepted and / or respected and the inter-relationships between roles are not always understood or considered. Related to this, there is a disconnect between the port offices and headquarters which is in part caused by ineffective management control and a high level of individual port office autonomy.
2. The spans of control are at the high end in a number of ports.
3. The appropriateness of the structure cannot be fully determined as the roles / responsibilities are not clearly established and the performance measured.
4. Currently, there is a vacancy on the Authority.
5. There will be a programme of work to deliver the required transformation arising from this review.

### 3. Organisational Structure and Design (OSD)

#### 3.1 Organisation structure, roles and responsibilities (cont'd)

##### Recommendation(s)

To ensure that the SFPA is fit for purpose to deliver on its strategic objectives, there is a requirement to clearly delineate responsibilities and link to defined measures of performance against which successful delivery of the strategic objectives will be assessed.

##### **OSD1 - Set out a clear framework of authority, responsibility and accountability across cross-functional tasks**

We recommend that a clear framework setting out decision rights, responsibilities and accountabilities capturing cross functional tasks is established. One such approach is a Responsible, Accountable, Consulted, and Informed (RACI) matrix which is a responsibility assignment chart that maps out tasks, milestone or key decision involved in completing a project or process and assigns which roles are Responsible or Accountable for each action and which roles need to be Consulted or Informed. It is used for clarifying and defining roles and responsibilities in cross-functional or departmental projects and processes. It is also helpful to addressing silos, balancing workload and defining responsibility for communication. The RACI approach could also be aligned to the Strategy or a RACI specifically developed for the Strategy.

##### **OSD2 - Review span of control in the ports**

We recommend that spans of controls are reviewed in the context of the (management) role of the SPO in the ports.

##### **OSD3 - Review of operating model**

We recommend that the operating model is kept under review during implementation of the changes recommended as the requirement for a new target operating model may become apparent. Appropriateness of the current operating model cannot be fully determined as the current / expected roles and responsibilities are not all clearly established nor operated.

However, there a number of intermediate steps from a structural perspective which we would recommend in terms of roles:

1. Fill the vacancy at Authority level with this role focusing on operations.
2. Reinforce the management role of the Senior Port Officer (SPO) - see OSD6.
3. Consider a PO level appointment on a contractual basis to work on the transformation recommended in this report - additional consulting/project/programme support is likely to be required to deliver on what is an extensive programme.

Some other HQ permanent appointments may be necessary, including potentially up to Principal level. Under operational capability, we have identified a number of areas including data strategy and analytics, risk, quality assurance, technology and programme management as areas which require development. The employment of contract/consulting staff to backfill/support Authority members/Principal Officers/Assistant Principals, to allow them to invest time on the implementation/transition agenda arising from this review and to further strengthen those functions, may be part of the solution during the transition process.

### 3. Organisational Structure and Design

#### **3.2 Roles defined by the Sea-Fisheries and Maritime Jurisdiction Act 2006**

While the 2006 Act is beyond the scope of this review, we note that some concerns have been raised about the Authority Structure. Under Section 47 of the 2006 Act, the Authority is to consist of at least one but not more than three members. Members, with the exception of the Seafood Control Manager who is effectively appointed permanently, may be appointed for a seven year term which is renewable. The existence of a three person Authority (as opposed to a Chief Executive Officer (CEO) model) may result in consensus building around decision making.

It should be noted that there is no provision for a Board in the Act. This point was raised as an issue throughout this review.

The Sea-Fisheries Protection Consultative Committee was established under Section 48 of the Act for the purpose of consultation and liaison with the sea-fisheries and seafood sectors and other relevant interests on matters relating to the functions of the SFPA. As noted in the Act, the remit of the Consultative Committee does not extend to detailed operational matters. It is consultative in nature. It is not an Advisory Board and the SFPA is not obliged to implement their views.

The Consultative Committee is of the view that the interpretation of the 2006 Act and the classification of certain matters by the SFPA as operational in nature has the effect of constraining the Consultative Committee in the performance of its duties and has requested approval from the SFPA to take legal advice on the matter. The SFPA is of the view that the Consultative

Committee should not have recourse to legal advice without guidelines.

#### **Finding(s): Advisory Board and Consultative Committee**

1. The Authority does not have the support or direction of an independently established Board or Advisory Board including expertise and/or professional experience beyond that specifically relating to the seafood and marine sectors.
2. The relationship between the Consultative Committee and SFPA is not working effectively at present.

#### **Recommendation(s)**

##### **OSD4 - Consider an Advisory Board with external experience**

We recommend the establishment of an Advisory Board, nominated by DAFM, comprising members with expertise and/or professional experience in senior administration, public sector governance requirements and management, not related to the sectors regulated by the SFPA, to assist the management in strengthening the capabilities of the organisation, is considered - this would not require a change to the Act.

##### **OSD5 - Reconfirm / define SFPA relationship with the Consultative Committee**

We recommend that the rules of engagement between the SFPA and the Consultative Committee are reviewed and agreed which should assist the relationship.

## 3. Organisational Structure and Design

### 3.3 Specific operational roles

The key operational roles refer to the SPO and the SFPO.

#### Role of SPO

The role of SPO is a critical one and acts as a nexus between the SMT and the staff in the ports. The SPO is a member of the JMT which includes the Authority members, the Directors (function heads) and the SPOs.

There appears to be a debate as to whether SPOs are part of the management structure and there are differing expectations as to what this role involves with management looking for SPOs to take on more management responsibility. The job descriptions for the two recent appointments to SPO more clearly reflects the envisaged management role.

As the SPO is based in the port and completes much of the same work as an SFPO, SPOs may see themselves as more closely aligned to the SFPOs than to management based in HQ. Also, we understand that some SPOs work the roster/shift system, which makes the management role more challenging.

Additionally, the salary differential between the SPO and SFPO grades at 10% is not regarded as sufficient with some seeing the differential as payment for preparing a port roster and signing off on travel and subsistence. Some SFPOs on Electronic Recording & Reporting Systems (ERS) duty availing of an on-call allowance are paid more than the SPO, which is a pay anomaly.

#### Dual role SFPOs

A number of HQ based SFPOs hold a dual SFPO / administrative role position. This means that dual role SFPOs are scheduled to spend 50% of their time on port duties with the balancing 50% on specialist desk based administrative duties in HQ. These SFPOs receive a shift premium. Dual role is not a reference to the two principal aspects of port duties, namely (1) fishing vessel inspection, and (2) food establishment inspection.

Dual role SFPOs work their field obligations during atypical hours which can have a negative impact in that they are not available to work or respond to administrative issues during normal hours. Similarly, it impacts the closing out on operational work. Administrative work is expected to be completed during daytime working hours. We understand that in practice, these central function roles are also typically performed during evening/night shifts when dual role staff are on roster.

Dual role SFPOs each report to two different managers. This makes it more difficult to definitively assess the percentage of time spent on port duties and central (function) duties and manage the workload of dual role SFPOs.

While the dual role was required and welcomed at a moment in time, it is not conducive to ensuring the necessary focus on both the protection/inspection work and central administration, and is no longer required.

## 3. Organisational Structure and Design

### 3.3 Specific operational roles (cont'd)

#### Electronic Recording & Reporting System

In 2009, with the introduction of the EU Control Regulation, a requirement was introduced for the phased introduction of an ERS for fishing vessels. The ERS is used to record, report, process, store and send fisheries data (catch, landing, sales and transhipment).

While the SFPA was tasked with responsibility for providing the on-board element of ERS i.e. the hardware and software and support training required to create and transmit ERS messages by the Masters of fishing vessels through a system known as ieCatch, a definite end date for what was largely a fixed piece of work was not established and it has continued longer than originally expected by management.

The SFPA has a number of SFPOs based in the ports who install the relevant systems on vessels. Some of these SFPOs are also involved in projects relating to ieCatch and ieInspect (see section 4.5). The SFPA has achieved its objective in that all vessels required to use the electronic logbook are doing so for the last eight years. In addition, in recent years, an outsourced provider, Cluain Daingean, was appointed to install these systems. Cluain Daingean mainly respond to support requests in the Munster region but occasionally elsewhere. Cluain Daingean's term has come to an end (2019) and the SFPA plans to issue a tender to secure the services of a company to provide this service nationally.

#### Finding(s): Specific operational roles

1. There are differing views of the SPO role. While this role is aligned more from a work perspective with that of an SFPO, there is a concern that the management role of the SPO and overall alignment to management in HQ is underdeveloped.
2. The existence of dual role SFPOs in HQ remains a source of contention and is not helpful to current business operations.
3. The SFPA's work in relation to the ERS was not clearly timebound which has resulted in some staff expectations as to its continuance. Secondly, the same approach to the delivery of the service does not appear to have been adopted nationally.

#### Recommendation(s)

##### OSD6 - Strengthen management control at port level

There is a need to strengthen management control at the interface between the ports and HQ. In the first instance, this will require reinforcing the management role of the SPO. In the absence of sufficient progress, the SFPA may wish to consider introducing a regional Director model (at AP level) with responsibility for a geographical area. In that case, the SPO could act as a form of deputy to the regional Director.

### 3. Organisational Structure and Design

#### Recommendation(s) (cont'd)

##### OSD7 - Address dual role SFPO issue

We recommend that the dual role of the SFPO in HQ is addressed as a matter of priority. SFPOs should focus full-time on one role.

##### OSD8 - Apply consistent ERS model across regions

A standard ERS model is implemented (whether internally or externally delivered) which is consistently applied in all regions. The practice of other SFPOs (outside Clonakilty) engaging in central type roles should be discontinued unless there is a particular case.

Note: The resourcing implications of recommendations OSD6 and OSD7 need to be considered.

#### 3.4 Central functions and silos

##### Central functions

Although staff have indicated a lack of confidence in some central units connected to salary and pension issues, this appears more related to the past and there is an acknowledgement that such central units have improved service levels. It has been a challenge for the SFPA to manage strategic and programmatic projects while managing business as usual.

Staff in many cases have become more specialist as is evident in the finance function (e.g. pensions). Policy and process is core to the role of Food and Fisheries Support (e.g. SOP development) while other units are increasingly more process driven such as Enforcement (e.g. agreement of engagement process with Chief State Solicitor's Office (CSSO)/DPP). A PMO has also been established for key projects which is funded under the EMFF.

##### Silos

While it is acknowledged that there are many experienced individuals within the SFPA, staff/management have indicated that within units individuals work in the main on their own areas of responsibility or in individual silos. This has a number of potential impacts, including fostering a culture of individual, rather than team effort; lack of cross cover and loss of organisational knowledge in the event of absence or someone leaving the organisation; and inhibiting work variety, which in turn can hinder staff development and impact on the readiness of staff for promotion.

### 3. Organisational Structure and Design

#### Trade and Audit (Brexit planning)

While there has been a considerable focus on Brexit planning by the SFPA, with 25 (of which 2 are still due) staff recruited to date and funding requested for a further eight roles, ongoing uncertainty over the shape/ timing of Brexit means that it is difficult to assess the level of resource required and assessing the impact on the SFPA's organisational structure will remain a key priority going forward.

The approach to quantifying resources required for Brexit does not appear to be based on detailed workforce planning. While expectations as to the increase in the number of certificates and landings exist, the underlying workings linking these to specific resources/roles are not evident.

#### Finding(s): Central functions and silos

1. PMO set up has helped the organisation on key projects and reduces silos and duplication of tasks.
2. Central units have been strengthened in recent years.
3. Staff within central functions tend to work in silos.
4. Brexit planning is ongoing and requires more work quantification.

#### Recommendation(s)

##### **OSD9 - Implement portfolio management approach across the organisation**

Building on the successful implementation of the PMO, we recommend that a portfolio management approach is implemented with regard to the prioritisation and implementation of projects and programmes across the organisation. The purpose of this approach is to drive cohesion across the portfolio of projects, irrespective of the source of funding, and programmes across the organisation to ensure they complement each other and effectively deliver on the organisation's strategy.

##### **OSD10 - Establish model of team-based working**

We recommend that team-based work is established as a way of working to help reduce reliance on silos within functions and across functions. Clarifying roles and responsibilities and implementing an organisation-wide PMO are important factors in reinforcing team-based work.

##### **OSD11 - Keep Brexit staffing under review**

We recommend that Brexit remains in focus and the discipline of workforce planning is applied to the extent possible, given existing data on workload and time taken to complete tasks.

## 4. Operational Capability (OC)

### Operational Capability

Operational capability refers to the ability of an organisation to align critical processes, resources and technologies according to the overall guiding vision and mandate; coupled with the ability to deliver these processes effectively and efficiently.

In assessing the operational capability of the SFPA, we have used the following guiding questions:

- Is the organisation delivering against its mandate?
- Are policies understood?
- Are processes/procedures set out? Are processes/procedures accepted and followed?
- Are existing systems considered fit for purpose? To what extent are existing systems integrated?
- How is the quality of service delivery being managed?
- To what extent does the organisation engage in workforce planning? Is effective control of the organisation's resources maintained?
- What workforce data is currently available to support workforce planning?

### Structure

The structure of this section is as follows:

**Introduction:** A high level overview of the SFPA's operational activities and its performance against targets.

**4.1 Defining, measuring and reporting on outputs and targets:** The availability, quality and consistency of output and performance data.

**4.2 Quality assurance:** The degree to which quality assurance and standard operating procedures exist.

**4.3 Risk assessment:** The extent to which the SFPA adopts a risk based approach to its operational activities.

**4.4 Workforce planning:** The extent to which the SFPA currently engages in workforce planning; including the availability of workforce data required to facilitate effective workforce planning.

**4.5 IT Capability:** High level assessment of the SFPA's IT capability, looking in particular at planning, managing and delivery capabilities.

**4.6 IT Capability - systems:** High level assessment of the SFPA's IT systems challenges including manual interventions.

**4.7 Data management/management information:** High level assessment of data management capability.

**4.8 People matters:** A high level assessment of the capability gaps and the degree to which succession planning is currently undertaken.



## 4. Operational Capability

### Introduction

The core activities of the SFPA in the areas of fisheries control and seafood safety are set out in Appendix 1. In this section we provide a high level overview of key output data and the performance of the SFPA against its targets under the areas of fishing vessel and food inspections, respectively. We also reference some of the ongoing operational issues by way of context. These issues highlight some operational areas where there have been challenges and a lack of progress.

### Fisheries control output data

Annual inspections is running at about 2,700 with detection of non compliance ranging from 0.7% % to 1.4% or an average of about 1.1% for the period 2014 - 2017. Progression of files on detection of non compliance has increased significantly to 2.3%.

**Table 4: Fisheries control output data 2013 - 2018**

Year	Vessel Inspections Total	SFPA Inspections	Naval Service Inspections	Incidents / No. of files	Detection of Non Compliance %
2018	2,683	1,922	761	61	2.3%
Average 2013 - 2017	2,761	1,683	1,077	31	1.1% (2014-2017)

Source: SFPA Annual Reports

### Seafood safety output data

The key driver of workload is the number of establishments and the risk rating applied. In 2018 there were 2,543 establishments. This number is relatively stable from year to year.

Annual inspections have varied from 1,245 to 2,802 since 2013 (or an average of 2,570 over the period 2013 to 2017), with 2,122 in 2018, which is a considerable variation. Non compliance ranged from 0.5% to 3%, or an average of 1.5% over the period 2013-2017, against 1.2% in 2018. The number of health certificates issued in recent years has increased as is evident from the table below.

**Table 5: Seafood safety output data 2013 - 2018**

Year	Inspection Total	Shellfish samples	Non Compliance %	Food Safety Incidents	Health Certificates Issued
2018	2,122	1,962	1.2%	25	7,168
Average 2013 - 2017	2,570	2,032	1.5%	25	5,388

Source: SFPA Annual Reports

**Note:** See Appendix 5 - SFPA key outputs and performance for further detail.

## 4. Operational Capability

### Fishing Vessel Targets

The EU requirement is that 5% of all vessel landings and 7.5% in weight terms undergo a full monitor (inspection) for certain pelagics. At a national level, these targets were met in 2018. At port level, each port met the 5% target for landings in 2018 however two ports missed the weight target (Castletownbere and Dingle). The SFPA applies the same percentage target to the ports albeit the SFPA's only requirement is to meet the overall national target.

Targets are proving challenging in 2019. Four ports are behind the full monitor inspection target both in terms of the number of landings and by weight. Of note, Killybegs which is significantly the largest pelagic port, is exceeding target which is critical to achieving the key EU targets. As we understand it, there are no targets for demersal species with the exception of a hake landing target of 20%. We do not have data to assess progress against this target.

### Food Inspection Targets

Food inspection targets are not being met as per 2018 and 2019 (first two quarters) metrics. All of the Ports are behind target for 2019. Three categories of inspections known as full hygiene, routine (incorporating elements of a full inspection) and approval of establishment count towards the target. Three of the Ports have achieved over 70% of their pro rata target to the end of July with three also reporting less than 50% to end July.

Similarly all of the Ports were behind target in 2018 with five achieving more than 80% of target.

In addition to food inspection, the issuing of health certificates is a key element of the SFPA's food safety mandate. There are differing views in respect of the work required to issue a health certificate.

### 2018 EU Audit Findings

The 2018 EU Audit highlighted significant weaknesses in the Irish control system.

### Legal and case management

The slow progress of cases was identified by the SFPA. There was a full restructure of the unit in 2017 and appointment of an Assistant Principal. The SFPA reviewed a range of issues with the DPP/State Solicitor and has established new procedures with the DPP to govern the relationship between the two bodies. The SFPA has reported progress since this restructure in 2017.

### Penalty points

One area which has proved difficult is the introduction of penalty points under Article 92 of the Control Regulation. It was originally introduced in Ireland under Statutory Instrument 3/2014 dated January 13, 2014. The system was successfully challenged in court and has not been implemented despite a number of attempts by the Government to introduce. The existence of a penalty point model would provide a useful alternative to going down the legal casefile route.

## 4. Operational Capability

### 4.1 Defining, measuring and reporting on inspection outputs and targets

Definitions of inspection outputs (e.g. inspection types/categories for fishing vessels) are not clearly defined and confusion exists eg. there appears to be some confusion as to whether inspections numbers include only physical inspections or potentially all categories of inspections (including non physical). All inspections are not necessarily the same and such distinctions are not made e.g. two physical inspections may not involve the same sets of inspection tasks. Furthermore, information on inspection targets, outputs and trends are not accessible in a manner which is helpful to analysing performance across all aspects of the SFPA's mandate over time. For example, the annual data sets for (1) pelagic fish, (2) demersal fish and (3) food are recorded in different spreadsheets. To build a complete picture, the three sources of data need to be combined and also for each year to understand the trends over time.

#### **Finding(s): Defining, measuring and reporting on inspection outputs and targets**

The absence of clear/agreed definitions and/or confusion as to what is included in inspection data hampers the quality of data. Furthermore, comprehensive and timely management information, and trend analysis, is not readily available or in a single source. As a result, it was also challenging to assemble data in order to measure performance against target for this review.

### Recommendation(s)

#### **OC1 - Define, measure, analyse and report on inspection outputs & targets**

We recommend that the SFPA:

- Develop/confirm clear definitions of inspection outputs (for an appropriate set of inspection types or categories, which may have different staffing needs), develop its data analytics capability and refine existing reporting to ensure a clearer focus and increase the visibility of performance against targets for management.
- Enhance analysis of the key work outputs (such as those presented in Table 4 and Table 5 of this report) to better understand the changes and trends such as for example, any fall / increase in the number of inspections, any significant change in the non compliance detection rate.

## 4. Operational Capability

### 4.2 Quality assurance

Quality is core to the SFPA. It refers to the systematic production, communication, management and monitoring of policies, processes and SOPs. It means, for example, that inspections within and across ports are carried out to the same high standard.

The absence of a framework or system for the production, ongoing management and communication of policies, processes and SOPs (including National Control Programmes) across the SFPA is well noted and documented. Specifically, in terms of SOPS:

- The food element of the SFPA's remit has a number of SOPs which are regarded as well set out and understood.
- However, there have been some problems in relation to fishing vessels. A Pelagic SOP has recently been agreed following consultation within the SFPA. A lack of consistency across the ports has been reported during the consultation process by staff and management and procedures in place previously were not confirmed or accepted practice. Similarly, the Demersal SOP is outdated, due to be revised and has, reportedly, suffered from the same lack of consistency.

The SFPA Statement of Strategy 2018 – 2020 identifies the development of a QMS and supporting systems as a key action for the period. There is limited quality assurance of inspection work in the context of business as usual. The Senior Port Officer (SPO) formally reviews the work of the Sea Fisheries Protection Officer (SFPO) in relation to food safety inspections and weigh permits but there is no other SPO review of the work of the SFPO.

It should be noted that from time to time, management will complete a review (internal audit or otherwise) of a particular aspect e.g. Audit of Port Management, Application of Legislation, Standardisation of Reporting. However, this is periodic and while useful to identify issues, the inconsistent application of draft/final SOPS as noted by management and staff indicates quality is a concern. A QMS project is currently commencing.

A concern raised during the consultation process was that notifications were received from Hong Kong and the Chinese authorities of non compliance with their Cadmium standard in Irish crab. The SFPA completed a review and confirmed a difference between the SFPA live official monitoring dataset and the industry / operator dataset, which was a noted source of increasing concern. The SFPA then made the decision to move to official state / SFPA testing per-consignments prior to certification. This new testing policy is effective from December 2, 2019 with official testing now conducted by the Marine Institute.

## 4. Operational Capability

### Finding(s): Quality assurance

1. Lack of consistency in the application of standard operating procedures across ports.
2. Absence of a framework or system for the production, ongoing management and communication of policies, processes and SOPs.
3. Limited quality assurance of inspection work in ports.

### Recommendation(s)

#### OC2 - Implement Quality Management System

We recommend that the QMS (currently due to commence) is implemented.

#### OC3 - Establish quality assurance structure / team

We recommend a small QA team is established to complete periodic and “independent” reviews of the implementation of agreed SOPs.

### 4.3 Risk assessment

Risk assessment approaches are set out in relation to both fishing vessel inspections (as developed by EFCA and the SFPA) and food establishment inspections. The SFPA is obliged to operate a risk based approach.

The SFPA developed a vessel risk rating model which reflects the specific risk of vessels and complements EFCA’s risk methodology, with the latter focusing on the species risk. As Irish vessels fish for a mix of species, the vessel risk rating should be the key consideration, although the ESCA species risk list should also be considered, when determining the need to inspect a vessel. There are four risk categories for vessels - very high, high, medium and low. Sixty percent of vessels are expected to fall into the two highest categories to which vessels are allocated and this is the case.

On the food establishment side, the level of risk determines the number of inspections. A high, medium and low risk categorisation applies. There is a detailed methodology including two risk scores which combine to determine an overall risk score.

## 4. Operational Capability

### Operational challenges

The vessel risk rating list/model was developed by a member of the management team. It is populated (largely manually) and maintained by the same manager using data from a number of systems. Its maintenance is labour intensive. Knowledge of the system appears to be limited to a small number of staff. It should be noted that the vessel risk list is maintained separately to other systems e.g, it is not connected to the Integrated Fisheries Information System (IFIS), the main system for recording inspection work and IFIS has no reference to the vessel's risk.

While the list is shared with the ports, it has not been demonstrated based on information provided to date, that the risk rating is a key determinant in influencing inspection patterns. The decision to inspect a vessel or to check the risk rating of a vessel, which the SFPO plans to inspect, is largely at the SFPO's discretion and decided within the port. It is not clear from our wider consultations that the risk assessment methodology relating to vessel inspections is being applied or used to guide inspection patterns. The recent EU audit highlighted this as an issue.

### Finding(s): Risk assessment

1. There is a lack of automation of the vessel risk assessment process which is too labour intensive.
2. It is not clear from our wider consultations that the risk assessment methodology relating to vessel inspections is being applied or used to guide inspection patterns.

3. The SFPA does not assess, monitor or report on where vessels inspected fall on the risk spectrum. Likewise, there is no reporting from the Naval Service in relation to the risk level of vessels inspected.

### Recommendation(s)

#### OC4 - Integrate risk assessment into inspection process

We recommend that the risk assessment process is clearly integrated into the inspection process.

### Recommendation(s) (cont'd)

#### OC5 - Ensure risk assessment process is properly developed, maintained, managed & monitored

We recommend that the risk assessment process for vessels is properly developed, maintained, managed and monitored.

#### OC6 - Continue to implement 'Valid' project

We recommend the continued development and implementation of the 'Valid Project' (see section 4.5) with regard to automated cross checks, business processes and risk assessments.

## 4. Operational Capability

### 4.4 Workforce planning capability

Workforce planning capability refers to the ongoing capability embedded in business and management processes to better align work requirements with workforce abilities. Workforce planning processes include:

- Assessing current workforce competency distributions;
- Analyzing gaps between current and desired states; and
- Working to close the gaps between current and desired states.

The availability and timeliness of operational and in particular workload data impedes the workforce planning capability of the SFPA. There is a view within the organisation that the unpredictable nature of inspection work makes planning and quantification of work difficult.

The SFPA does not have data or has not been able to provide data showing the level of work completed in the ports at an individual officer level nor is data available in relation to time taken to complete key tasks such as a vessel or food establishment inspection.

To date, workforce planning has been largely left to SFPA HR. The development of a Workforce Plan 2019-2020 by SFPA HR in March 2019 is a positive development. While it includes the key components of a workforce plan, it is short term / operational in focus and lacks depth of analysis in respect of the current and future required skills and competencies, and workload requirements.

The necessary information to move to a more scientific based workforce planning is not currently readily available and / or requires further development. For example, operational resource efficiency or productivity at an individual level does not appear to be assessed by central management nor is it known if work is allocated equally within ports.

Further, whilst there is an expectation of a 50% split of organisation time between Seafood Safety and Sea-Fisheries Protection, it is not easy to verify this due to data limitations.

### **Finding(s): Workforce planning capability**

**There is significant scope for the SFPA to improve and enhance its workforce planning capability. To date, it has not been treated as a priority involving the active leadership and engagement of the full senior management team. While some positive progress has been made by SFPA HR, the focus on workforce performance and productivity, underpinned by robust data and analysis has not been a feature.**

## 4. Operational Capability

### Recommendation(s)

#### OC7 - Establish evidence based workforce planning

As a priority, a fully integrated approach to workforce planning is needed and should encompass the following set of complementary developments and initiatives:

- Creating an annual cycle of review and implementation of workforce development activities;
- Workforce planning should focus in the first instance on operations/port work where most of the resources are allocated. The most efficient use of SFPA resources (including time) should be assessed when considering workforce planning;
- Increased engagement on workforce planning by senior management and business units;
- The development of reliable processes to collect and report on pertinent workforce data, such as workforce performance and productivity measures; and
- Business re-engineering and the optimisation of technology (e.g. a digital work allocation system) where appropriate.



## 4. Operational Capability

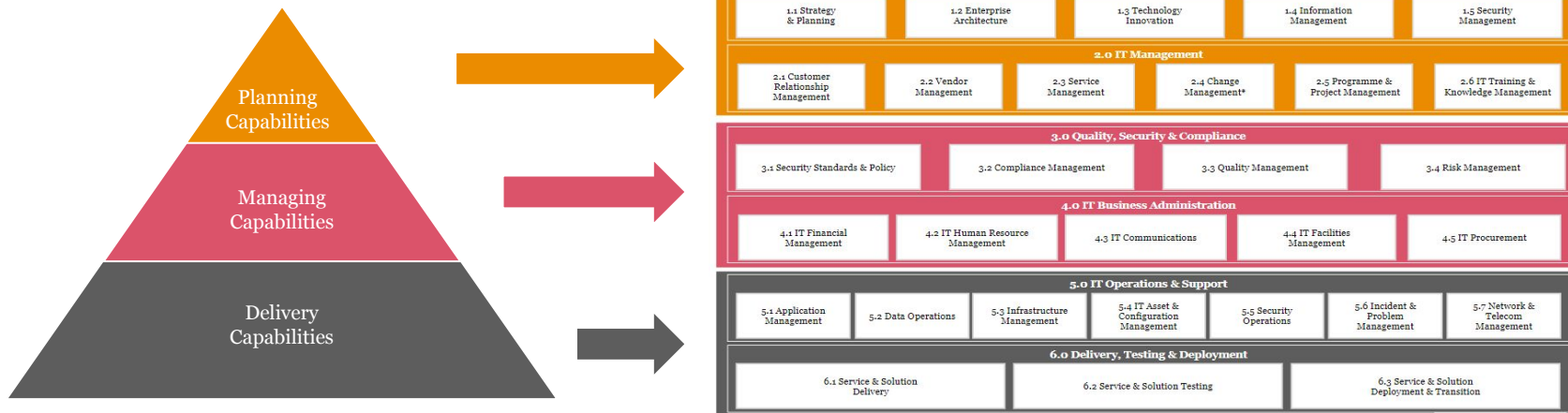
### 4.5 IT capability

We performed a high level assessment of the IT Capability of the SFPA using the PwC capability framework. The PwC capability framework provides us with a standard structure through which the SFPA's IT Operating model can be assessed and to identify areas for improvement. We use IT Capabilities as the focal point for problem analysis allowing us to quickly cut through complexity and provide a way to communicate what must be resolved without initially delving into the details of how.

The capabilities can be categorised as:

- **Planning Capabilities** which are focused on providing a strategic direction both across the function and with the wider organisation.
- **Managing Capabilities** which are focused on giving effect to the strategic direction.
- **Delivery Capabilities** which are focused on ensuring the day to day operation of the function across both project delivery and ongoing support functions.

**Figure 5: Assessment of SFPA IT capabilities**



## 4. Operational Capability

### 4.5 IT capability

Our high level assessment of the IT capability of the SFPA involved the completion of a detailed questionnaire with members of the SFPA IT department. A heat map (see Appendix 6) was created by consolidating the responses to the questionnaire. The heat map gives a pictorial view. The key findings emanating from this high level assessment are presented here.

#### Findings: Planning Capabilities

These capabilities focus on providing a strategic direction both across the IT function and the wider organisation. The current role of IT is primarily focused on the operational needs of the organisation and responding to the day to day needs of the organisation. There is no documented IT Strategy to support the Corporate Strategy which results in the lack of a plan setting out the goals, objectives, desired outcomes, metrics for measuring progress, timelines, and budgets.

#### Recommendation(s)

##### OC8 - Define role and establish a strategy for IT

We recommend that:

- The role of IT is clearly defined which is a necessary building block for the definition of an effective IT organisation and the establishment of an agreed position within the SFPA; and
- An IT Strategy is documented that is aligned to the Corporate Strategy.

#### Findings: Managing Capabilities

These capabilities within the IT function refer to the capabilities necessary to manage people, suppliers and finances. They are focused on giving effect to the strategic direction of the organisation.

However, the absence of a documented IT strategy means there is a gap between strategy and execution. This is leading to short term and tactical decision making by IT which is unlikely to result in the realisation of any long term or strategic business benefits.

#### Recommendation(s)

##### OC9 - Document business unit plan and develop internal IT management capabilities

Once an IT Strategy exists, we recommend a business unit plan is created setting out the basic steps required to achieve that future. The plan should include goals and objectives, desired outcomes, metrics for measuring progress, timelines, and budgets and IT Service delivery partners.

Objectives include:

- Building strong internal capability to oversee the design, future direction of the IT and business architecture to support the business strategy.
- Ensuring better alignment between job title and resource capability and responsibility (e.g. review the effectiveness of Sea Fisheries Protection Officers with operational responsibilities also performing IT roles).

## 4. Operational Capability

### 4.5 IT capability

#### Findings: Delivery Capabilities

These capabilities are focused on ensuring the day-to-day operation of the function across both project delivery and ongoing support functions. Our findings suggest that IT are primarily focused on being able to respond to the resolution of IT issues.

#### Recommendation(s)

##### OC10 - Define skills gaps to transition to new IT operating model

We recommend that the role of IT is defined with a view to identifying the short and medium term skills gaps and transitioning to the new IT operating model.

This includes:

- Reviewing areas where there is over reliance on Third Parties and develop a sourcing strategy.
- Creating clarity around roles and responsibilities for new and existing roles and conduct training needs analysis.
- Identifying and remediating defects earlier in the development lifecycle with better user involvement and segregation of duties thereby reducing operational risk and improving stakeholder experience of IT.

## 4. Operational Capability

### 4.6 IT capability - systems

There are a number of functions across the SFPA requiring IT system support.

#### Case management

The SFPA does not have an IT system for case management. Stakeholder interviews conducted during this engagement have highlighted:

- The process and speed of moving case files through the legal system is an issue. Meetings have been held with the DPP's Office to agree a more effective system.
- A concern that cases may not be proceeded with after some significant time has elapsed and that communication in relation to this outcome to the relevant SFPO does not always happen. The recent EU audit also identified that some cases did not proceed.

A project titled National Register for Infringements is now underway to address this area and to provide suitable case management capabilities.

#### Quality and document management

The objective of the QMS project, a PMO managed project scheduled to commence and funded under the EMFF, is to develop a quality management capability with responsibility for defining and managing quality standards, metrics, policies and procedures. This project is also expected to address document management.

There is no organisation-wide approach to document management. The absence of a defined approach is leading SFPA units to adopt their own approaches, which is leading to governance limitations, lack of consistency, inaccuracies relating to version control, document ownership and sign off. The SFPA plans to introduce eDocs (a documents and record management system), which is critical to support the wider approach to quality management.

#### Integrated Fisheries Information System (IFIS)

The main system for recording fishing vessel data is IFIS. IFIS is the system for the administration and enforcement of sea-fisheries regulation or core regulatory and compliance solution. IFIS is managed by DAFM's Information Management and Technology (IMT) Group. The IT department's involvement and oversight of compliance related activities is limited. Staff are of the view that IFIS and the Official Agencies Premises and Inspections (OAPI) Database are outdated and not fit for purpose. OAPI is a web-based database system for recording establishment and official controls related to food safety.

#### ieInspect

IFIS is connected to ieInspect which is the system employed by SFPOs (when inspecting vessels) to electronically record catch data. Information is transferred into IFIS from ieInspect. Uploading to ieInspect has been problematic and usage therefore low. Where this occurs, data is recorded *manually* before being inputted into IFIS post inspection. The SFPA recognises this issue and a project team supported by the PMO is currently working on a solution.

## 4. Operational Capability

### 4.6 IT capability - systems

#### Crosschecks

Crosschecks of data relating to landings are not recorded electronically. The regulations require that Member States perform cross-checking analyses and verifications of data through automated computerised algorithms and mechanisms. Crosschecks refers to checking if catch weight data is consistent for the various records e.g. for prior notifications, logbooks, landing declarations, weighing records, sales notes, and transport documents. Cross checks are done *manually*. The EU audit noted that they are often incomplete which indicates non-compliance. The SFPA recognises the criticality of this issue and a project team supported by the PMO is currently working on a solution (Project Valid).

#### Fishing vessel risk list

As noted, the risk list for fishing vessels is maintained separately to IFIS meaning that analysis from IFIS has no reference to the risk rating of the vessel. This makes the identification of the risk of the vessel more labour intensive or *manual* as two sources of information should be considered when identifying the target inspection.

#### Diptest

The results of the dip-tests to check catch weight, and the percentage difference between the figures notified in the prior notification to land (PNO) messages are *manual/paper* based. This issue was also noted in the 2018 EU audit.

### Finding(s): IT capability - systems

1. A number of areas are underdeveloped from a systems perspective e.g. case management and document management.
2. There is a reliance on manual intervention. A number of issues have been identified and are being addressed currently i.e. ieInspect and Crosschecks/Valid.
3. Issues have been noted in respect of the vessel risk list and dip-tests.
4. Leveraging and implementing the recommendation(s) listed in Section 4.5 above - IT Capabilities (planning, managing and delivery) will enhance maturity in this area and will enable the IT department support the business and related future direction and requirements.

### Recommendation(s)

In working towards improving the operational capability of the organisation, and minimising the level of manual and paper based processes, while maximising data analytics to inform decision making, IT will be a key strategic partner of the SFPA and must be used effectively to support delivery of objectives and measurement of same.

## 4. Operational Capability

### Recommendation(s) (cont;’d)

#### **OC11 - Implement case management and documentation management systems (Link to QMS)**

We recommend that the SFPA implement case management and documentation management systems in line with the introduction of the QMS.

#### **OC12 - Implement key systems projects including the IeInspect & Crosschecks projects**

We recommend that the SFPA implement the planned projects for IeInspect and Crosschecks and address other systems issues as noted in the findings.

## 4. Operational Capability

### 4.7 Data management/management information

The data analytics issue has been recognised by the SFPA. The appointment of a member of the Authority to a new role Brexit Lead and Chief Scientific Advisor, which has data analytics capability within its remit, confirms this.

There is no documented data strategy within the SFPA and data analytics is underdeveloped as a core competency.

The challenges encountered during this review, in accessing operational and support/central services data in a uniform and standard manner, to allow analysis of SFPA outputs and activities, indicates that data provision operates to a low level of maturity.

The absence of real workforce planning based on real time information is a reflection of the current state of play. For example, we have not seen any analysis of individual SFPO work output which is essential to workforce planning.

#### **Finding(s): Data management/management information**

1. The absence of a data strategy and data analytics as a core competency are both of concern.
2. Management information in relation to organisational outputs is set out in a number of spreadsheets making an informed view of the overall state of play or performance over time and different activities difficult to appreciate. This is not helpful to ensuring effective management control.

### **Recommendation(s)**

#### **OC13 - Perform data maturity and management assessment**

We recommend that a maturity assessment of the current state data management and data governance capabilities is performed.

#### **OC14 - Document data strategy**

We recommend that the SFPA develop a Data Strategy aligned to the Corporate Strategy.

#### **OC15 - Develop data analytics (Data management)**

In parallel, we recommend that the SFPA develop its data analytics capability to help support key activities, including workforce planning, cross checks, risk modelling and assessment, etc.

## 4. Operational Capability

### 4.8 People matters

This section covers a number of people related aspects - succession planning, skills (see also learning and development) and recruitment.

The SFPA does not have a formal **succession planning** process. However, given the numbers involved, succession planning is not a significant issue. For example in 2016, there were 4 retirements and 1 death in service, 2017 – 1 retirement, 2018 – 4 resignations (2 were staff who did not return after long term career breaks) and 1 retirement and 2019 – 1 resignation to date and no retirement. The workforce planning document (March 2019) demonstrates that the SFPA staff age profile is spread across the various age cohorts with 70 staff aged 30 to 44 years of age.

Generally, the organisation finds it has a sufficient pool to fill posts which become available at a senior level. Also, the internal Workforce Planning Document (March 2019) noted that 61% of staff have over 10 years of service which indicates the existence of an experienced workforce.

A range of **skill** needs have been identified as areas for development including, for example, consistency in approach to inspections, programme management, technology, management training for new managers, and data analytics. Some of the skills required (e.g. data analytics) will also require external recruitment.

Management have focused strongly on **recruitment** needs with considerable growth in recent years, particularly in central functions and more recently in the ports.

### Finding(s): People matters

1. Areas identified (outside of Brexit) as potentially under resourced include risk, quality assurance and technology (as a business partner). Programme management is identified as a key area for delivering on the organisational change.
2. The SFPA does not have a formal succession planning process nor is one required.
3. As noted culture is at the heart of this review, and the recommendations across the themes are critical to bringing about cultural change. To date, the SFPA has not formally measured or audited culture.

### Recommendation(s)

#### OC16 - Address resourcing requirements

We recommend that risk, quality assurance, technology and programme management are prioritised from a resource perspective to meet requirements going forward. Formal planning is required.

#### OC17 - Complete a cultural audit

We recommend that a cultural audit is completed once the strategic direction is clear. The culture audit should identify the current cultural traits in the organisation and consider how these traits inhibit or enable the achievement of organisation goals, and identify the critical behaviours to focus on to realise any necessary cultural shift. The culture audit will result in a baseline against which progress can be monitored over time.



## 5. Industrial Relations

### Industrial Relations Capability

IR, as a capability refers to the ability of an organisation to foster good employee relations, generate a positive working relationship between management and union representatives and enable a collaborative relationship which enhances the overall productivity and output of a business while enhancing employee engagement and well being.

In assessing the IR capability of the SFPA, we have used the following guiding questions:

- Is there an IR framework in place? If so, is it effective?
- What is the relationship like between key stakeholders?
- Are there any historical, ongoing or pending disputes and claims? Are these being resolved in a timely manner and at the appropriate level?
- To what extent are the unions involved in the setting of HR-related matters e.g., target setting, policies and procedures, decision-making?

### Structure

The structure of this section is as follows:

**Introduction:** Overview of the IR environment.

**5.1 Relationship between the SFPA and DAFM:** Role of DAFM with respect to decisions outside the control of the SFPA and impact on IR.

**5.2 Functionality of the IR Framework:** Examines the effectiveness of the IR Framework in place.

**5.3 Relationship between Management and Representatives:** Examines the working relationship between the SFPA and Fórsa and the SFPA and local representatives.

## 5. Industrial Relations

### Introduction

Industrial relations in Ireland is governed by the Industrial Relations Act 2015. Fórsa is the sole representative organisation for SFPA employees.

The IR relationship between the SFPA and Fórsa is regulated by the procedural agreement for Arbitration. The procedural agreement for Arbitration operates in accordance with the Sea-Fisheries and Maritime Jurisdiction Act, 2006. This agreement is implemented through the Joint Council (JC) which is chaired by a Third Party.

The SFPA has policies in place for discipline and grievances. These policies are written in line with the National Code of Practice on Grievance & Disciplinary Procedures. If issues cannot be dealt with locally they are escalated to the JC.

The JC consists of representatives of the Authority and Union and meets once every two months. In the terms of reference for the JC, it is described as a negotiation / consultation forum. Unresolved issues are referred to the Workplace Relations Commission (WRC) or an Independent arbitrator.

There are currently a number of ongoing IR issues being dealt with at local level, JC, WRC and by Independent Arbitrator. These issues are outlined in summary form in the table opposite.

**Table 6: Key SFPA industrial relations issues**

Subject	Issue
<b>Delegated Sanction</b>	The implementation of Delegated Sanction is an ongoing issue since 2015. The issue was referred to Arbitration in December 2017. A 1/6th payment was recommended for individuals who voluntarily migrate to the new structure. The issue is currently at a standstill.
<b>Office accommodation</b>	There is a request for port office accommodation for the Cork area.
<b>Communications</b>	The process and communication of lateral transfers have been questioned by staff / unions who feel they are not consulted with appropriately.
<b>Haddington road</b>	The SFPA were originally told not to include allowances in determining eligibility for pay reductions. SFPA have since learned this was incorrect and retrospective pay deductions must be made. The impact of this is to be determined.

## 5. Industrial Relations

### 5.1 Relationship between the SFPA and DAFM

The SFPA is funded through the Department and relies on input from the Department to address some IR issues.

#### **Finding: Clarity around SFPA remit**

There are three major issues impacting the IR environment in the SFPA which are not fully within the control of management. Decisions on these issues require input from the SFPA's parent department (DAFM) and government and the nature of the decisions made, and the timing of those decisions have been highlighted as concerns for both management and the union.

#### **Recommendation(s)**

#### **IR1 - Clarify SFPA's decision-making remit with DAFM and timelines to solve IR issues**

The SFPA needs to clearly identify the principal IR issues for resolution and agree routes to resolution of these issues and timelines for same with its parent department and government, as appropriate. Going forward, the SFPA needs to ensure it has clarity around its remit in decision making as it relates to IR issues and agrees timelines and sign offs with its parent department / government at the outset of the IR process. Fórsa and staff representatives also have a role to play in identifying the principal IR issues for resolution and agreeing routes to resolution of these issues.

### 5.2 Functionality of the IR Framework

The IR relationship between the SFPA and Fórsa is regulated by the procedural agreement for Arbitration. This agreement is implemented through the JC. The JC is chaired by an independent external person. Management and Unions also have access to an external independent arbitrator. Standard employee relations policies (e.g. discipline, grievance, etc.) are also in place.

#### **Finding: Application of the framework**

The structure of the IR framework is strong with relevant procedures in place. However, from our conversations with both Management and Unions and our review of documentation provided, it is apparent that the application of the framework needs improvement. Issues are not being dealt with at the appropriate level and are escalated to the JC without sufficient local engagement.

#### **Recommendation(s)**

#### **IR2 - Reconfirm escalation channels within IR framework**

Provide each SPO with a copy of their job description and provide them with adequate training to enable individuals to carry out their activities with a particular focus on grievance and discipline handling.

The IR framework must be followed. See also section 5.3.

## 5. Industrial Relations

### 5.3 Relationship between Management and Representatives

From the workshops, surveys and 2019 “Stress Audit & Risk Assessment Sea Fisheries Protection Officers - Clonakilty” (March, 2019) it is evident that the current IR relationship is visibly strained. There is an apparent lack of trust between Fórsa and the Authority.

Personal relationships between management and SFPA local representatives have also been identified as an issue by both the Union and management. Management claim that Fórsa are obstructive and difficult to deal with, while employees have expressed concern over a lack of consultation.

#### **Finding: Strained working relationship**

While the survey sample is small, the scores are high in the view of the investigation in terms of participants reporting some degree of stress. It should be noted that both personal and work related issues may be contributory to reported levels of stress.

The SFPA and Fórsa have both acknowledged the poor working relationship. This is particularly evident in the JC which is outlined as a mechanism for negotiation / consultation. However, some of the issues dealt with at this level should have been dealt with locally and achieving compromise appears to be difficult.

It is important to recognise and understand that both staff and management have a role to play in reframing this relationship and in moving beyond the challenges of the past with a renewed spirit.

### Recommendation(s)

#### **IR3 - Define and monitor IR protocol**

A key element to make progress will be an agreed protocol or charter on how staff and management engage with each other. Fórsa has an important role to play in assisting the SFPA on this journey. A solution to the strained working relationship between management and union representatives needs to be found as a matter of priority. Both parties need to engage (with external assistance if required) to discuss their working relationship. This should focus on the nature of how they engage with each other and how they want to engage with each other in the future. The outputs of this should be brought together in an IR Protocol governing ways of working, agreed by both parties. Mechanisms should be put in place to monitor adherence to the protocol.

## 6. Learning and Development

### Learning and Development Capability

L&D, as a capability, refers to the ability of an organisation to develop the skills and capabilities needed to meet current and future operational delivery and policy requirements.

In assessing the L&D capability of the SFPA, we have used the following guiding questions:

- Is the learning strategy aligned with the organisational need?
- Is there a clear approach to the development of the learning and development strategy?
- Does the organisation have a structured and accountable approach to the management of learning and development (learning governance)?
- Is there a system that provides for the collection and reporting of minimum baseline data?

### Structure

The structure of this section is as follows:

**Introduction:** Overview of the management of L&D within the SFPA.

**6.1 L&D Strategy:** The approach to L&D relative to organisation needs.

**6.2 Identifying L&D Needs:** The approach to identifying and prioritising L&D needs, and the effectiveness of learning governance.

**6.3 IT Systems for L&D:** The extent to which technology is used in the management of L&D.

## 6. Learning and Development

### Introduction

Whilst the SFPA does not have a formal L&D Strategy in place, a number of L&D objectives have been identified as part of the HR Strategy 2019-2023. L&D objectives include, amongst others:

- An investment of 2% of payroll annually in L&D for all staff.
- Aim to source a LMS and encourage a move to more online training.
- Develop and roll out an accredited management development programme to support the continuous development of managers and re-emphasise the role of the manager in terms of their people management responsibilities.
- Develop a training matrix for all compulsory training and frequency of refresher training required.
- Aim to strengthen the accountability framework for people managers and drive culture change where people managers are accountable for the management development and performance of their teams.
- Consider rolling out a Management Development Academy to HEO grade over the course of this strategy.

Learning and development needs within the SFPA have been identified in recent years through the twin approach of a formal Training Needs Assessment (TNA) and the PMDS. Probation reviews are also consistently carried out and help to identify training needs.

**TNA:** Between 2016 and 2018, a TNA was undertaken, with external support, with the purpose of developing a clear view of training needs.

**PMDS:** The SFPA employs the PMDS utilised in the public sector. It is a two-point rating system. L&D is fully integrated with the PMDS process. Identified training needs are manually extracted from PMDS forms and every member of staff with an identified need is contacted and plans made to provide the necessary training.

Other notable developments in L&D include:

- Since November 2017, all new employees receive induction and onboarding;
- New SFPOs undergo a 10 week training programme;
- In its Workforce Planning 2019-2020 report, the SFPA has committed to continuing to support further education in specialist areas such as Data Analytics, IT, and Project Management relevant to an individual's role in order to continually improve the specialist skills of the organisation.
- The PMDS process has identified a need for:
  - Management development training - an accredited management development programme was launched during the summer period of 2019;
  - Language training - A programme of online Skype language training was launched for SFPOs.

## 6. Learning and Development

### 6.1 L&D Strategy

Notwithstanding the absence of a formal L&D Strategy, the extent to which the SFPA engages in and provides support to learning and development featured prominently in exchanges at staff workshops. This was also evidenced in the Report of the Analysis of the Employee Opinion Survey of the SFPA carried out by Joe Wolfe & Associates in 2009, which highlighted that many respondents recognised a strong learning and development culture within the SFPA.

With a wide range of issues, particularly IR, the SFPA has invested in the provision of training. Per the 2019 Training Plan, the projected year to date (YTD) spend on training up until October 2019 is €111,555, which represents 1.2% of payroll. On a pro rata basis, this suggests a total investment of 1.6% of payroll for 2019, which is slightly behind the target of 2% set in the HR Strategy 2019-2023.

As noted in the recent internal Workforce Planning 2019-2020 report, staff are well qualified academically. The majority of staff (over 75%) hold a Degree qualification and in addition to this, many staff hold a Masters qualification.

The HR Strategy 2019-2023 captures the SFPA's strategic ambitions in the area of L&D, however it falls short of what is expected of a formal L&D Strategy. An L&D Strategy is a core part of the strategic planning process. Its purpose is to link learning and development activities systematically with organisation needs and to establish priorities and plans for activities and resources.

### Finding: L&D Strategy and Governance

The SFPA has invested in L&D, and it is viewed by staff as an area of strength. However, opportunities exist to ensure a more comprehensive and cohesive approach to L&D that supports the SFPA in achieving its strategic and operational goals.

### Recommendation(s)

#### LD1 - Agree L&D strategy (align to organisational goals)

Building on the SFPA's strategic ambitions for L&D, as set out in the HR Strategy 2019-2023, and the recent work undertaken as part of the 2018 TNA, develop a comprehensive L&D Strategy that prioritises business needs and aligns with the organisation strategy.

Ensure appropriate governance structures are defined and include clear lines of responsibility and reporting to reinforce the link between organisational capability needs and the formulation of learning and development strategies and resulting activities.

## 6. Learning and Development

### 6.2 Identifying L&D Needs

Over the period 2016 to 2018, the SFPA undertook a TNA with support from external consultants. It is clear that significant time and effort went into the TNA, which included:

- Review of the existing training landscape including the strategies and policies, and the performance and evaluation of training;
- Review of the resources available for training and training governance;
- Review of IT systems for training; and
- Identification of the training required by role within each business unit.

The purpose of a TNA is to identify performance requirements and the knowledge, skills, and abilities needed by an organisation's workforce to achieve the requirements. A TNA should also identify the gap that exists between what is needed and what is currently available.

Whilst the SFPA TNA identified the core and supplementary training required at a role level within each business unit, it did not identify overall, team or individual gaps; nor did it relate the training required back to performance requirements and / or the SFPA's overarching strategic or operational objectives. The TNA appears to have no current status and is not being used to guide training efforts. Furthermore, whilst it included a detailed review and outlined preliminary recommendations in a number of areas such as training governance, training resources and IT systems for training, the ownership and current status of these preliminary recommendations is unclear.

L&D needs are also identified through the PMDS process. However, the focus is on L&D needs identified by the individual and their manager. There is a risk that it fails to take a holistic account of organisation wide training needs.

### Finding: Training Needs Assessment

Although the TNA is not being formally used, its existence is a start. Further work is required to identify the gaps that exists between the knowledge, skills and abilities needed by the SFPA's workforce to achieve its requirements, and what is currently available. The identification of gaps through the PMDS process at an individual level is not likely to be sufficient. Account needs to be taken of organisation wide and team training needs.

For example, at an organisation wide level, a range of skill needs have been identified throughout our work as areas for development. These include:

- Understanding and compliance with new legislation or regulations (currently not digitally enabled);
- Building trust and managing conflict;
- Management training for new managers and management in general;
- Programme and change management;
- Data analytics;
- Presentation of management information and managing against metrics;
- Becoming a more digitally enabled organisation.



## 6. Learning and Development

### Recommendation(s)

#### LD2 - Complete / revise training needs analysis

Build upon the existing TNA to identify the gap that exists between the knowledge, skills and abilities needed by the SFPA's workforce to achieve its requirements, and what is currently available, at an organisation, team and individual level.

Provide clarity around the ongoing maintenance and required use of the TNA in the PMDS process, along with training to management to ensure better integration of the TNA into the PMDS process.

#### 6.3 IT Systems for L&D

“Effective Software” is the current software being utilised to record and document the training undertaken by the SFPA at an employee level. Effective Software is a Health & Safety Software system which is a centralised, cloud based Health & Safety Management platform. Its use has been extended by the SFPA to include non Health & Safety related training.

The TNA undertaken by the SFPA included a review of the Effective Software system from a training perspective. It highlighted a number of gaps in the available functionality including the absence of an online training platform.

A preliminary recommendation from this review was the introduction of a LMS. The introduction of a LMS has been captured as an objective within the HR Strategy 2019-2023:

*“SFPA HR will aim to source a LMS and encourage a move to more online training. A LMS system can be used as a central repository to store online training, recorded webinars, videos, training material, sending training invites, enrolments, and maintain a central database for all training records.”*

The HR Strategy also notes the potential benefits of increased use of technology in the delivery of SFPA training.

Following a desktop review of SeamsCloud LMS, Workday and HR Locker, the TNA identified SeamsCloud LMS as a good fit for the SFPA. It also noted “Moodle”, the LMS currently in use by DAFM, as a potential consideration.

#### Finding: IT Systems for L&D

The SFPA is currently relying on a Health & Safety software system for the management of its L&D activities which is not fit for purpose. The SFPA has recognised the need to introduce a LMS within its HR Strategy 2019-2023 and has carried out some preliminary research into potential alternative solutions. It has also recognised the potential benefits of increasing the use of technology in the delivery of SFPA training.

### Recommendation(s)

#### LD3 - Procure new learning management system

Establish a project to ensure the successful procurement of a new LMS with an appointed project manager and a clear timetable for procurement and implementation.

## 7. Communications

### Communications Capability

Communication as a capability is the creation of two way communication channels and sharing of information with employees and external stakeholders to enable the achievement of the business strategy.

In assessing both the internal and external communications capability of the SFPA, we have used the following guiding questions:

- Is there a formal internal communications strategy in place. If so, is it effective?
- Are internal communications delivered effectively through the appropriate channels?
- Do the SFPA's external communication and promotional strategies effectively target stakeholders?
- Are communications adequately aligned with organisational strategy?

### Structure

The structure of this section is as follows:

**Introduction:** Overview of the SFPA's communications strategy.

**7.1 Internal communications:** Strong guidelines for internal communications, but ongoing dissatisfaction with application of same

**7.2 Communication between Head Office and ports:** Disconnect between head office and port offices, resulting in localised and individualised working arrangements

**7.3 Monday Morning meeting:** Room for improvement in interdepartmental information sharing

**7.4 External Communications:** Consideration of appropriate forum for delivery of external communication to different parties

## 7. Communications

### Introduction

The Communications strategic objectives for the SFPA are outlined within the Statement of Strategy 2018-2020. These objectives are outlined under 'advise' and aim to continue to improve internal and external communications through:

- A fit-for-purpose intranet
- The review and implementation of relevant policies
- The roll-out of an internal partnership model
- A fit-for-purpose website to promote compliance
- A revised customer charter.

This is in line with the KPI for communications outlined in the oversight agreement between the SFPA and DAFM 2017-2020 as 'Proactive provision of advice and information through a clear communications strategy'. External communications are primarily delivered through the services of PR company Weber Shandwick.

## 7. Communications

### 7.1 Internal communications

Internal compliance objectives are outlined under 'enforce' in the Statement of Strategy 2018-2020. This involves the improvement of preparation, management and clarity of internal documentation. The internal and external communication channels are outlined in Appendix 7. An internal audit report was carried out in 2014 to assess if effective controls were in place for internal communications in the SFPA. This report found that a generally sound system of internal control was in place which could manage key risks identified.

There are internal communication guidelines outlined in the Communications Policy, 2013. This document outlines the need to have frequent and proactive internal communications activities and aim to enable employees to have the opportunity to influence the methods of their work through formal and informal communications.

The document also recognises the need to improve internal communications, specifically in relation to informing employees of management plans.

#### **Finding: Clarity with internal communications**

Despite having strong guidelines in place it is apparent communication is still an issue, particularly in relation to updating employees with management plans. This is evident in the Analysis of the Employee Opinion Survey of the SFPA report carried out in 2009 and Stress Audit carried out in 2019 with SFPOs in Clonakilty. These reports both highlight that there is a lack of transparency and clarity with internal communications for the SFPA.

The implementation of any change emerging from this review should have communication as a core element.

#### **Recommendation(s)**

##### **C1 - Clarify internal communications mechanisms, follow up and monitor against policy**

Clarify the purpose of each internal communications mechanism, including the benefit for the owners, participants and receivers. Identify the messaging, content and style required to meet this purpose. Add in regular checks to ensure communications remain in line with purpose and is effective, engaging and relevant.

Follow the guidelines of the existing Internal Communications Policy. SPOs need to take ownership of providing regular updates to employees. Each SPO should be provided with a copy of their job description and training if required to improve this.

## 7. Communications

### 7.2 Communication between Head Office and ports

There are structures in place for internal communications between Head office, ports and employees. These are outlined in the communication channels. The predominant forms of communication in the SFPA are meetings and emails.

#### **Finding: Gap in communication between Head Office and ports**

Although communications between ports appears strong, there is an apparent disconnect between head office and ports. This is visible in the lack of SOPs and knowledge sharing which has resulted in different patterns of work in each port. Improving the sharing of information between departments has also been signaled as an area for improvement by employees.

#### **Recommendation(s)**

##### **C2 - Enhance communication between head office and the ports**

Target improving the working relationship between Head Office and ports through:

- Utilising regular two way communication channels; and
- Defining and communicating SOPs to each Port.

### 7.3 Monday Morning meeting

A weekly Monday morning meeting takes place to keep staff informed. A recording of this meeting is available to those who are unable to attend due to rosters or other commitments. All ports and divisions provide updates on key activities and meetings which took place during the week and also details on future events.

#### **Finding: Effectiveness of Monday Morning meeting**

It has been identified throughout this review in both workshops and group feedback sessions that the Monday morning meeting is not operating productively. This meeting involves updates from each port and head office. However, it appears that much of the information currently being shared is not necessarily relevant to all and is too detailed.

#### **Recommendation(s)**

##### **C3 - Revise and implement Monday morning meeting agenda**

Put in place meeting guidelines and manage against these so as to ensure meetings are relevant and informative, with specific focus to the Monday morning meeting.

## 7. Communications

### 7.4 External Communications

The SFPA primarily communicates to external stakeholders and to the public through their website, leaflets and attending industry events such as Sea Fest. These are outlined in Appendix 7. External communications content is primarily produced by external PR company Weber Shandwick.

The role of Weber Shandwick is to:

- Increase awareness and understanding of the SFPA's positive role in the area of sea-fisheries conservation and sea-food safety amongst key stakeholders.
- Position the SFPA as the authoritative source of information on relevant matters.
- Promote compliance and its benefits.
- Targeting all key stakeholders.
- Using a variety of tactics and communications channels to reach audiences effectively and efficiently.

### Finding: Targeted External Communications

The effectiveness of the SFPA's external communications should be evaluated with regard to feedback from the SFPA's target audience. A 2017 communications survey identified a preference for the use of email for updates over word of mouth. There was mixed feedback on the breakfast events and consideration should be given to whether on pier communications activity would be a beneficial additional method of communication. Similar to internal communications, any change emerging from this review will have communication as a core part of implementation.

### Recommendation(s)

#### **C4 - Consider most appropriate communication channels for interacting with fishermen at ports**

Identify and implement the most appropriate form of interaction for each category of communication, e.g. email, breakfast events, on-pier communications. Monitor and review effectiveness (with key stakeholders) on a regular structured basis.

## 8. Conclusions and Next Steps

### 8.1 Conclusions

Emerging from this review is an organisation which has reached a critical point. The SFPA has been subject to a number of EU audits, which led to an Administrative Inquiry, and an action plan to address “severe and significant weaknesses” identified in the Irish control system during a pelagic audit carried out in 2018. A substantial number of issues have been identified in this report, most notably:

- Strategic Management - The strategy is not a unifying force.
- Organisation Structure & Design - The structure and roles and responsibilities (including decision making rights) are not always accepted and / or respected and the inter-relationships between roles are not always understood or considered. Related to this, there is a disconnect between the port offices and headquarters which is in part caused by ineffective management control and a high level of individual port office autonomy.
- Operational Capability - People, processes and technology are not working together effectively with the effect that the SFPA is not consistently meeting its targets.
- IR - The existing IR processes reflect good practice, however outcomes are lacking due to a lack of trust on both sides.
- Learning & Development - Opportunities exist to ensure a more comprehensive and cohesive approach to L&D that supports the SFPA in achieving its strategic and operational goals.
- Communications - Despite having strong guidelines in respect of internal communications, its application and effectiveness is an issue.

While many of the issues identified in this report have surfaced in other reviews, this report offers a comprehensive and holistic view of the wide range of issues impacting the organisation. Arising from this report, it is clear that the current situation is not sustainable, and relationships and trust have been impacted.

The organisation is at a point of inflection and significant transformation is required. Such a transformation will require support from the Authority, management, staff and key stakeholders to generate momentum to move forward in a time critical manner. Staff and management will need work together to deliver on the transformation required.

Culture is one of, if not the, critical component in any organisational transformation. An organisation’s culture is its basic personality, the essence of how its people interact and work.

*“It can be simply defined as the self sustaining pattern of behaviour that determines how things are done” (1)*

As such, culture is inherent in everything the SFPA does as opposed to being an abstract concept or standalone activity.

(1) Strategy & / Katzenbach Centre: 10 Principles of Organisational Culture (Jon Katzenbach, Carolin Oelschlegel, James Thomas, 2016)

## 8. Conclusions and Next Steps

There are a number of levers that can be used to achieve cultural change and reinforce the desired behaviours and values. The PwC model of cultural change (presented in Appendix 8), identifies 7 cultural levers, listed below.

**Figure 6: Levers of cultural change**



The 6 themes in this review are, or can be mapped directly to these, levers of cultural change, also in Appendix 8. These levers are supported by reinforcers of cultural change, and many of these reinforcers have also been considered in the context of this review. Therefore addressing these issues as part of any implementation plan will also help to drive cultural change.



## 8. Conclusions and Next Steps

### 8.2 Next steps

The scale of the findings requires a substantial change programme with a strong focus on delivering on a large number of recommendations over the next 18 months. This change programme will require clear governance and structures to ensure delivery.

#### Governance and Overall Approach

##### M1 - Establish Oversight Group

We recommend an Oversight Group be established and that it include external oversight of the programme of change. This could be a sub-group of the Advisory Board and this is suggested for consideration in recommendation OSD4.

##### M2 - Adopt a PMO Approach

We recommend that the SFPA adopts a PMO approach to the delivery of the recommendations set out in this report. A PMO approach will help to ensure a disciplined and programmatic approach to managing a wide range of projects spanning all of the six thematic areas within the scope of this review - see also recommendation OSD9. There is an existing PMO within the SFPA which is managing a range of projects currently. A number of the existing projects are addressing some of the issues raised in this review. While the existing PMO is EMFF supported, the organisation's need are best served with programme staff who work on projects across the entire organisation, irrespective of the source of funding. It will also bring rigour to the programme focused planning process which is required as part of programme and project commencement.

### Implementation Plan

The following is a high level summary of the implementation plan. The detail has been captured in the Executive Summary.

**Table 7: Phasing for implementation plan - indicative**

Phase	Focus	Timing (Months)
1. Short-term	The focus here is on setting the tone and involves critical foundation-building work covering key thematic areas in order to position the SFPA for the next phases. During this phase there will be a strong focus on projects in the following areas: planning, strategy, organisation structure, industrial relations, and communications; as well as establishing governance mechanisms such as an Oversight Group for implementation.	1-4
2. Medium-term	During this resource-intensive phase much of the redesign work is finalised and projects are implemented. The focus here is on the operational capability/operating model, strategy, organisation structure and design and learning and development.	5-8
3. Long-term	This phase is mainly about completing projects, operating effectively and monitoring to ensure delivery. These projects will take place during the period and not necessarily over the full period in all cases.	9-18+

# 04 Appendices

Appendix 1: Overview of SFPA and core activities

Appendix 2: Stakeholders

Appendix 3: Staff & unit head surveys

Appendix 4: Interviews and workshops conducted

Appendix 5: SFPA key outputs and performance

Appendix 6: IT capability assessment heat map

Appendix 7: Communication channels

Appendix 8: Understanding the levers and re-enforcers of cultural change

Appendix 9: Glossary

## Appendix 1: Overview of SFPA and core activities

### Principal Functions

The SFPA was established in 2007 under the provisions of the Sea-Fisheries and Maritime Jurisdiction Act 2006 and operates under the aegis of the DAFM. The principal functions of the act are as follows;

- To promote compliance with and deter contraventions of sea-fisheries law and food safety law.
- To detect contraventions of sea-fisheries law and food safety law.
- To provide information to the sea-fisheries and seafood sectors on sea-fisheries law and food safety law and relevant matters within the remit of the Authority, through the Consultative Committee established under section 48 or by any other means it considers appropriate.
- To advise the Minister in relation to policy on effective implementation of sea-fisheries law and food safety law.
- To provide assistance and information to the Minister in relation to the remit of the Authority.
- To collect and report data in relation to sea-fisheries and food safety as required by the Minister and under Community law.
- To represent or assist in the representation of the State at national, Community and international fora as requested by the Minister.
- To engage in any other activities relating to the functions of the Authority as may be approved of by the Minister.

### Seafood Safety (see overleaf for core activities)

The SFPA monitors and inspects food safety controls on fishing vessels, as well as in establishments that handle, prepare and process seafood. The SFPA's role in seafood safety includes the implementation of European hygiene package legislation as well as the inspection and health certification of export consignments.

### Sea-Fisheries Protection (see overleaf for core activities)

The role of the SFPA is to protect sea-fisheries resources and support their sustainable development through promoting, verifying and enforcing compliance with national and European laws.

### Location

The SFPA is headquartered in Clonakilty, Co Cork and operates from an additional six (6) locations based at major Irish fishing ports. These ports are located in Howth, Dunmore East, Castletownbere, An Daingean, Ros a Mhíl and Killybegs.

### Resources

Through the SLA with the DoD, both the Naval Service and Air Corps conduct at sea surveillance and inspections of fishing vessels within Irish Exclusive Economic zone.

## Appendix 1: Overview of SFPA and core activities

### Fisheries Control

#### Vessel Inspection Tasks for Pelagic, Demersal and Inshore Vessels

- Pre Inspection
- Vessel Inspection
- Follow-up and completion of Inspection File
- Enter on IFIS
- Forward to Operator
- Post landing controls

#### Control at Sea

- Aerial Protection patrols
- Surface Sea Fishery Protection patrol days

#### Principal types of fisheries control inspections

There are different types of inspections:

- Inspection of a fishing vessel at sea;
- Inspection of fishing vessel(s) on transhipment/transfer to another vessels;
- Inspection of a fishing vessel in port or on landing and before first sale;
- Market/premises inspection;
- Inspection of transport vehicles.

### Seafood Safety

#### Approved Establishment (land-based & freezer/factory vessels)

- Risk Assessment
- New Approval Inspection
- Full Hygiene Inspections/Full Inspection
- Routine Inspection
- Follow-up, Complaint & Other Inspections

#### Registered Food Business Operator (FBO)

- Inspections (Full Hygiene, Routine, Follow-up, Other)

#### Vessel

- Vessel Hygiene Inspection in  $\geq 15\text{m}$  Vessels
- Vessel Hygiene Inspection in Vessels that are  $\geq 10\text{m}$  and  $<15\text{m}$
- Vessel Hygiene Inspection in  $<10\text{m}$  Vessels.

#### Shellfish Production Areas

- Spot checks on shellfish harvesters

#### Transport Vehicle

- Transport Vehicle Hygiene Inspections

#### Port

- Fish Quality Inspection at Landing

#### Approved Establishment

- Fish Quality Inspection at First Sale

#### Various

- Temperature Checks
- Parasite Checks
- Labelling Checks
- Issuing of Health Certificates

#### Animal by-product (ABP) processing establishments

- ABP Inspection

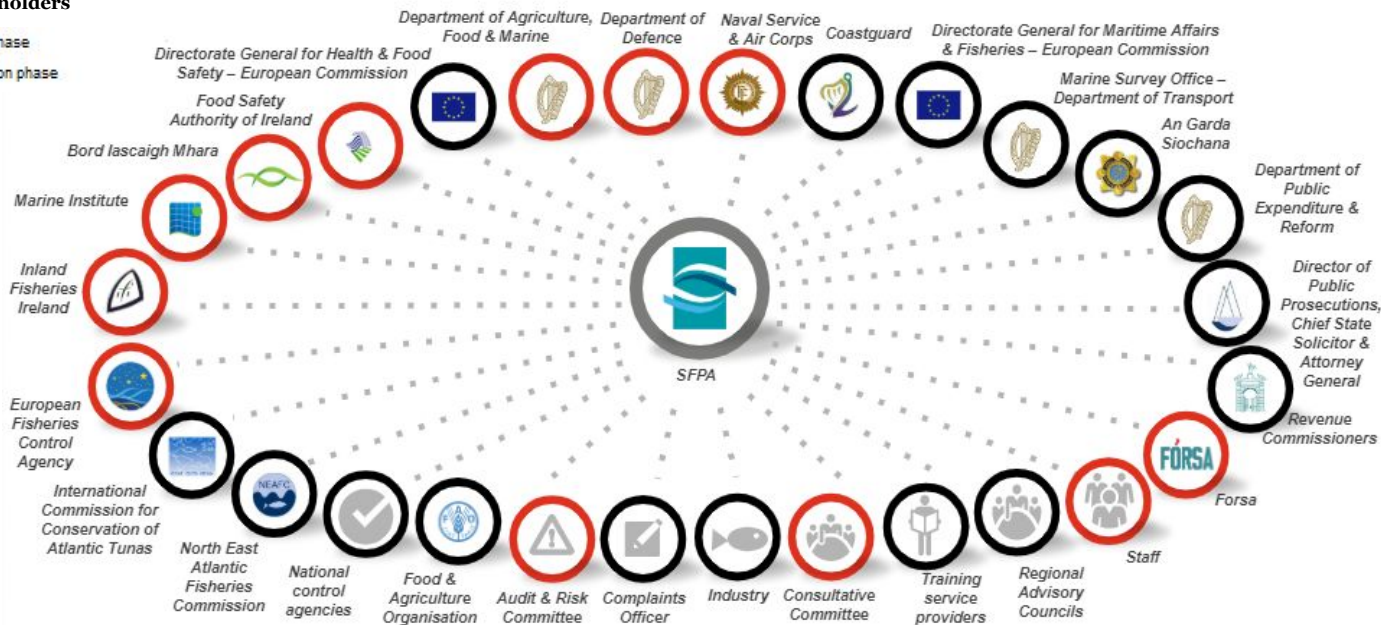
## Appendix 2: Stakeholders

### Who are the principal stakeholders of the SFPA?

The SFPA works closely with a range of partners in order to deliver its mandate. A number of key stakeholder were consulted to inform this work, with several different forums provided to facilitate staff feedback.

Figure 7: Key SFPA Stakeholders

- Met during consultation phase
- Not met during consultation phase



## Appendix 2: Stakeholders

### Who are the principal stakeholders of the SFPA?

The SFPA engages with several partner bodies and has a number of strategic relationships. Below are a limited number of the key Irish stakeholders.

#### Key Irish Stakeholders

*Department of Agriculture, Food and Marine*

DAFM is the parent department which is responsible for policy formulation, corporate governance oversight, and resource allocation.

*Food Safety Authority of Ireland*

A service level agreement exists between the SFPA and the FSAI which outlines the responsibilities of the SFPA in respect of food safety from production to consumption.

*Inland Fisheries Ireland*

The IFI and the SFPA cooperate with a view to the overall efficiency of state inspection services, and specifically in the area of inshore fisheries control operations.

*Department of Defence*

DOD is the parent department for the Naval Service and the Air Corps, the two principal agencies involved in operationally supporting the SFPA.

The SFPA works closely with a number of international partners including European institutions and their agencies that have key roles in sea-fisheries and seafood safety.

#### Key European Stakeholders

*Directorate General for Health and Food Safety (DG SANTE)*

This Directorate is responsible for EU policy on food and health and for monitoring the implementation of related laws.

*Directorate General for Maritime Affairs and Fisheries (DG MARE)*

The Commission department is responsible for the implementation of the Common Fisheries Policy and of the Integrated Maritime Policy.

*European Fisheries Control Agency (EFCA)*

The agency's mission is to promote the highest common standards for control, inspection and surveillance under the Common Fisheries Policy (CFP). Its primary role is to organise coordination and cooperation between national control and inspection activities so that the rules of the CFP are respected and applied effectively.

## Appendix 3: Staff and unit head surveys - key findings

As part of our consultation with staff, we administered a survey. There were **57 responses** to the staff survey. In this section, we present some of the key themes emerging. In addition, **13** heads of unit/function responded to a survey of unit heads (answers are in italics).

### Strategy

#### Strategic Objectives

The enforcing of sea-fisheries law and food safety law were the key strategic objectives identified in the survey.

The Support, Advise, Validate, Enforce (SAVE model which is the overall framework (headings) for the Strategic Plan features as a prominent theme when staff members were asked about the SFPA key strategic objectives.

Staff are aware of the Strategic Plan, its overall framework and mandate/mission.

#### Effect of Strategic Objectives on function/role

Respondents indicated a lack of clarity around the objectives leading to confusion around their role and responsibility.

Lack of leadership with regards to communication around the Strategic Objectives.

Little access to relevant strategic information.

#### Effectiveness of Strategic objectives

Over 40% of survey participants believe that the strategic objectives of the organisation is in line with SFPA goals.

Majority of respondents suggested that the strategic objectives deliver on the vision of providing safe and sustainable seafood. *Unit heads held a similar view although about half feel change is required in the strategy or strategic direction.*

### Structure

#### Roles and Responsibilities

Nearly 60% of staff (*80% of unit heads*) had sufficient knowledge and were clear in their individual role and responsibility.

Out of this sample of participants, 25% of SFPA employees were unclear when answering on this topic.

*39% of unit heads are of the view that the structure is not fit for purpose. 61% indicated it is fit for purpose and 22% noted that a resource issue applied.*

#### Colleagues Roles and Responsibilities

Only 24% of staff surveyed thought their colleague had sufficient knowledge with regards their role within the organisation.

*60% (46% of unit heads)* of staff believed that their colleague lacked clarity and knowledge around their role and responsibilities.

#### Allocation of resources to strategic objectives

When asked where allocation of resources should be streamlined, staff answers varied:

- Improved alignment of the business organization structure with the strategic objectives through role clarity, better communication and consistency of information given and received.
- Organisation restructure and redesign was also a key theme when answering on this topic e.g. staff feeling that the SFPA is too HQ/Clonakilty centric, disconnect between HQ and the port operations.
- *Focus on primary functions (unit heads) – food safety and sea-fisheries are the most common themes.*

*Note: the text in italics highlights some key points from the survey of unit heads. In general, unit heads have a more favourable view of the SFPA.*

## Appendix 3: Staff and unit head surveys - key findings

### Communications

#### Communication Style & Effectiveness

Over 60% of participants felt the communication in the organisation ranged from not effective to very poor.

Lack of senior management effort, key information not being clear and concise and major organisational changes not being communicated to staff were among the key responses.

Only 7% felt that the SFPA had an effective communication style

*Majority of unit heads who responded indicated that the communication style is good.*

#### Communication experience/changes

Over 60% (30% of unit heads) of participants have had a negative experience with the organisation communication model.

The survey suggests that less than a fifth of staff (or majority of unit heads) have a positive outlook on the current communication experience.

Improvement in transparency & honesty, better relations between management and staff and the use of clear and consistent language in the communications model were the key suggestions.

#### Organisational Change

When asked about their view on change, management resistance and lack of communication when change occurs were the key themes emerging.

A third of all staff reported a negative experience regarding change within the organisation.

Accountability and transparent communication were identified as the key organisational changes required.

*Change is not well managed and respondents are looking for more direct and open lines of communication.*

### Organisational Effectiveness

#### Key challenges within the organisation

Out of the staff survey respondents, the following challenges were identified:

- Staff retention in the medium to long term;
- Need for further technological advances;
- Management of risk and compliance issues; and
- Efficient strategic planning and decision making.

*The top two issues noted by the unit heads were technological advancement and resource gaps.*

### Management

*A number of respondents stated that senior management should be more present in the office as well as a less silo based approach with a more collaborative working environment.*

*No clear style and lack of clear decision making - main response.*



## Appendix 3: Staff and unit head surveys - key findings

### Process & Procedures

#### Process knowledge within the SFPA

Almost 60% of survey participants suggested that they had little or no visibility of the organisations end to end processes.

#### Process improvement

When asked what process improvements could be made to the SFPA, they following suggestions were given;

- Improved staff communications in reference to to protocols and scoping of their roles.
- An organisation restructure.
- A more improved IT infrastructure to minimise manual processes.
- *Introduction of more automation (unit heads).*

#### Operation procedures review and improvement

The following responses were given when surveyed about what procedures were in need of review;

- Fisheries enforcement procedures (*also mentioned by unit heads*).
- All SOPs and Code of Practice (COPs) procedures.

Nearly 40% of survey participants did not know if there was a quality/process improvement procedure in their department.

### Technology

#### Staff execution of role

Nearly 70% (85% of unit heads) of staff surveyed agreed that the use of systems and/or databases was vital to the successful execution of their role.

Only 17% of participants did not use technology in their day to day activities.

#### SFPA technology offering

40% (31% of unit heads) of staff surveyed suggested that the hardware offering of SFPA is only somewhat fit for purpose.

40% (69% of unit heads) of participants agreed that the software offering in the SFPA was not fit for purpose.

In terms of technology improvement, staff suggested the following;

- Updating of software packages available.
- Vast improvement of systems/databases.

#### Data sources and improvement

The IFIS, OAPI and Automatic Identification Systems (AIS) are the key systems which SFPA staff use as data sources.

40% (c. 55% of unit heads) of participants in the survey suggested that the data is only somewhat accurate from the key data sources within the organisation.

## Appendix 3: Staff and unit head surveys - key findings

### Learning and Development

#### Capabilities/Skills

When asked what skills were most important to the role, staff surveyed provided the following answers;

- Communication skills and knowledge of the industry.
- Must be analytical and accurate.
- Must be fair, honest and transparent.

In terms of skills gaps within the SFPA, technically skilled employees, managerial training and development and improved senior management communication to staff were all key themes documented. *Management skills identified by unit heads as a skills gap.*

#### Learning & Development Framework

The following suggestions were made when staff were asked on changes they would like to see in the learning & development framework;

- Improved personalisation of training and learning services.
- Independent, effective performance structure with upward staff feedback.
- More management time and support put into performance framework and how it should work.
- *Unit heads did not identify any significant new requirements.*

#### Training

Over 70% (100% of unit heads) of staff surveyed confirmed that they had been given the opportunity for training to pursue further development at some point.

While only 14% of staff had not been given the chance to attend training in some capacity.

#### Performance Management Development System

In terms of suggestions to enhance the performance system, the following suggestions were given;

- Improved goal setting.
- Development of a more personalised framework and clearer guidance on performance process were noted.

## Appendix 4: Interviews and workshops conducted

### Internal interviews and workshops

Date	Location	Attendees	Scale
02/08/2019	Clonakilty	Authority Member	One to One
02/08/2019	Clonakilty	Director of Finance	One to One
02/08/2019	Clonakilty	Director of Corporate Affairs	One to One
08/08/2019	Dunmore East	Dunmore East staff	Port Workshop
12/08/2019	Clonakilty	SMT	SMT Workshop
12/08/2019	Clonakilty	HQ staff	HQ workshop (1)
14/08/2019	Donegal	Killybegs staff	Port Workshop
20/08/2019	Clonakilty	Director of HR	One to One
20/08/2019	Clonakilty	HQ staff	HQ Workshop (2)
20/08/2019	Clonakilty	Director of Food & Fisheries Support	One to One

Date	Location	Attendees	Scale
21/08/2019	Dublin	Inland Fisheries Ireland	One to One
22/08/2019	Dublin	Howth staff	Port Workshop
26/08/2019	Killarney	Dingle & Castletownbere staff	Port Workshop
27/08/2019	Ros a Mhíl	Ros a Mhíl staff	Port Workshop
30/08/2019	Dublin	Fórsa and staff representatives	Group Meeting
04/09/2019	Dublin	Consultative Committee	Group Meeting
04/09/2019	Dublin	Bord Iascaigh Mhara	One to One
04/09/2019	Dublin	Marine Institute	One to One
06/09/2019	Clonakilty	Authority Chairperson	One to One
09/09/2019	Clonakilty	Audit and Risk Committee	Group Meeting

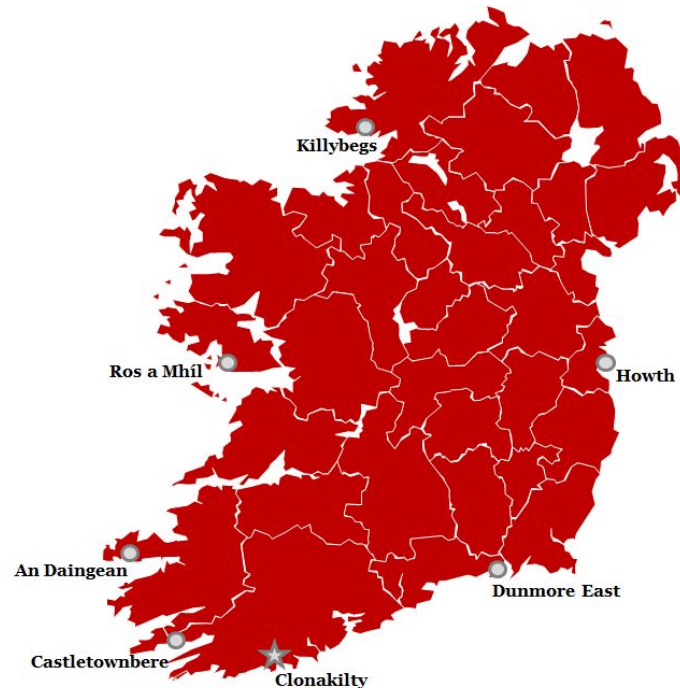
## Appendix 4: Interviews and workshops conducted

### External interviews and workshops

Date	Location	Attendees	Scale
09/09/2019	Dublin	Food Safety Authority of Ireland	One to One
12/09/2019	Clonakilty	Internal Steering Group	Group Meeting
12/09/2019	Clonakilty	Department of Agriculture, Food and the Marine	One to One
12/09/2019	Telecon	European Fisheries Control Agency	One to One
16/09/2019	Newbridge	Department of Defence, Naval Service and Air Corps	Group Meeting
18/09/2019	Telecon	Director of Port Operations	One to One
19/09/2019	PwC Cork	Authority Member	One to One
02/10/2019	Clonakilty	Internal Steering Group	Group Meeting
16/10/2019	Clonakilty	Director of Port Operations	One to One

### SFPA port offices

Figure 8: Location of the primary SFPA offices



## Appendix 5: SFPA key outputs and performance

### Fishing vessel inspections - Pelagics inspection activity by landings (>10,000 Kg)

#### Ahead of target for landings (>10,000 Kg)

- The total number of inspections amounted to 498 in 2018, of which 69 were full monitors. The target was 35 (based on 5%). A full monitor means the process is inspected from the vessel landing right through to the end of processing in the fish factory.
- Killybegs is by far the biggest pelagic port with the number of full monitor also exceeding the overall 5% target.

Chart 2: Pelagic landings by Port (FY 2018)

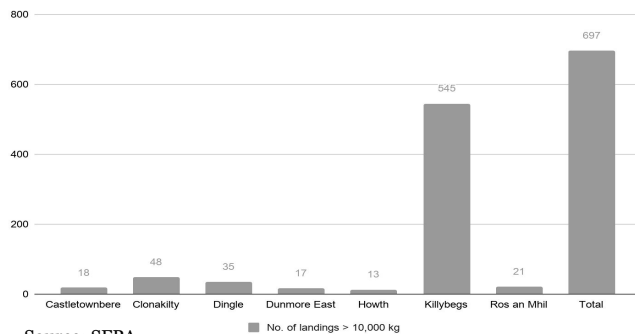


Chart 4: Pelagics inspection activity by landing (FY 2018)

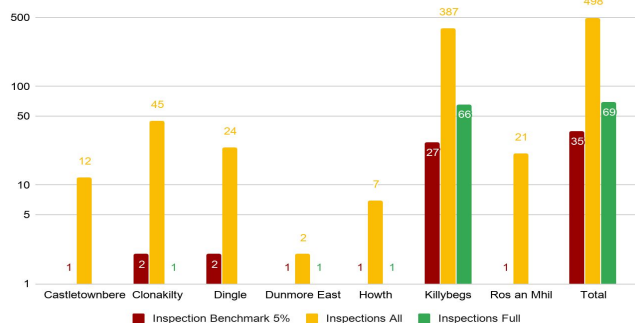


Chart 3: Pelagic landings by Port (Q1&Q2 2019)

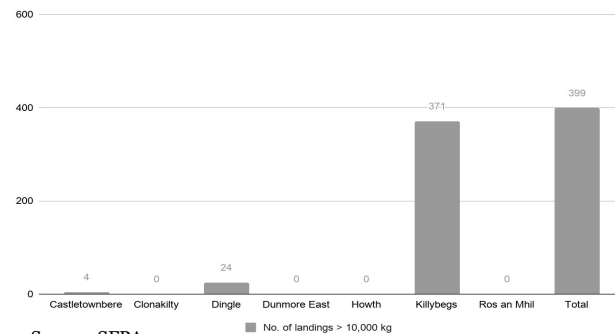
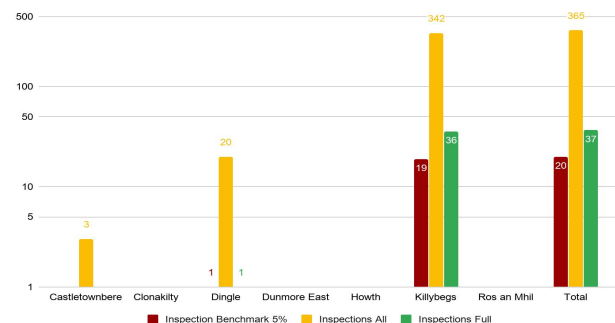


Chart 5: Pelagics inspection activity by landing (Q1 & Q2 2019)



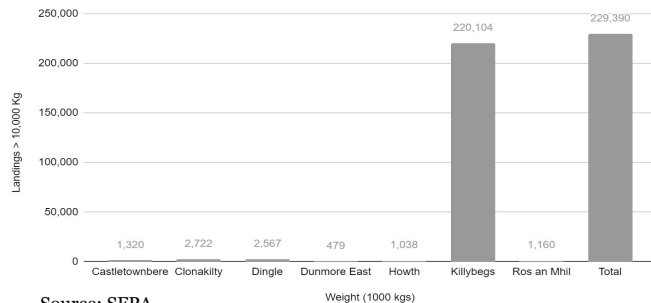
## Appendix 5: SFPA key outputs and performance

### Fishing vessel inspections - Pelagics inspection activity by weight (1,000 Kilograms (Kgs))

#### Ahead of target for landing by weight

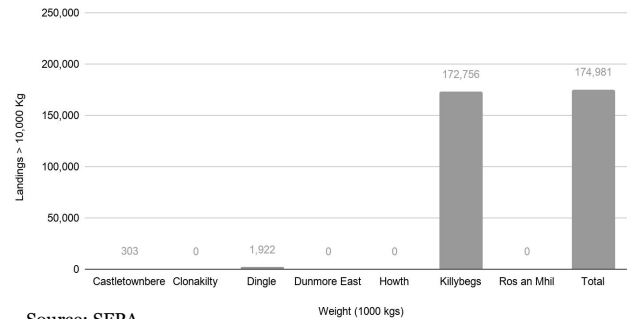
- The total weight (in 1000 Kgs) landed was 229,390 in 2018 of which 216,211 Kg was inspected with 26,864 Kg being part of a full monitor against a target of 17,204 Kg. Overall, targets are being met also in 2019.
- The 7.5% target was exceeded overall and for individual ports with the exception of one. Similarly one port is behind in 2019 after Q2.
- Three of the Ports did not complete any full inspection in 2018.

Chart 6: Pelagic landings in weight by Port (FY 2018)



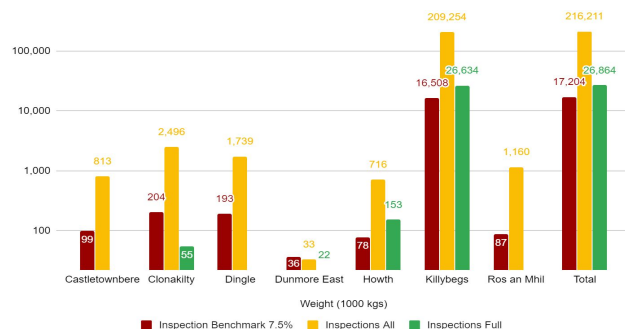
Source: SFPA

Chart 7: Pelagic landings in weight by Port (Q1&Q2 2019)



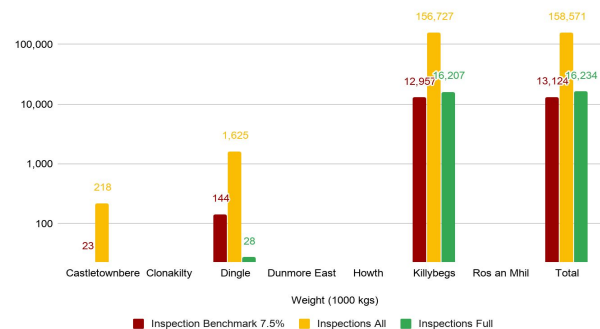
Source: SFPA

Chart 8: Pelagics inspection activity by landing (FY 2018)



Source: SFPA

Chart 9: Pelagics inspection activity by landing (Q1 & Q2 2019)



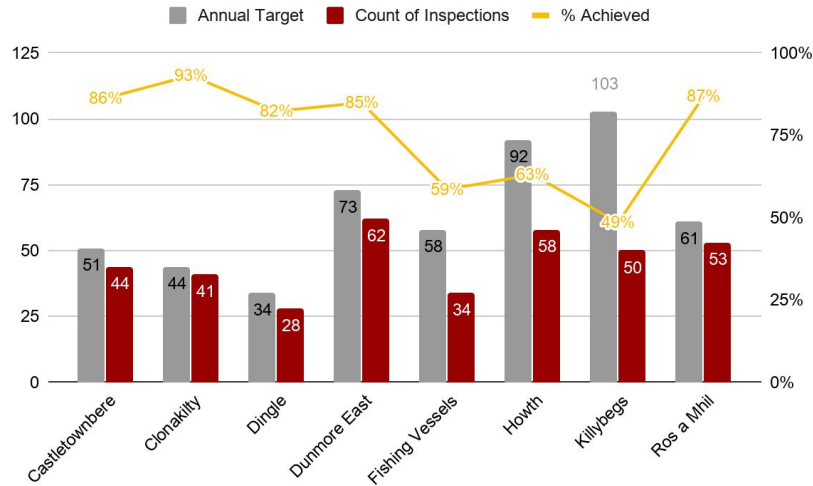
Source: SFPA

## Appendix 5: SFPA key outputs and performance

### Food - target inspections by Port

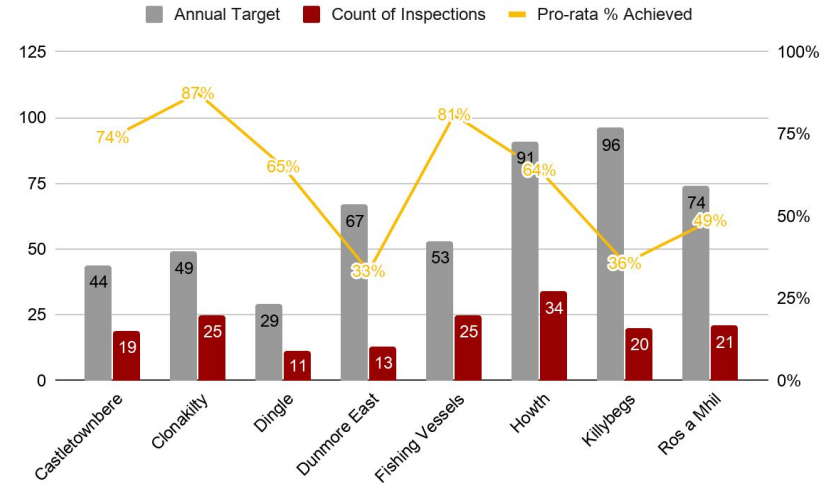
Key food safety data - all of the Ports are behind target for 2019. Three of the Ports have achieved over 70% of their pro forma target to the end of July with three also reporting less than 50% to end July. Similarly all of the Ports were behind target in 2018 with five achieving more than 80% of target.

**Chart 10: Target inspections achieved by Port (FY 2018)**



Source: SFPA

**Chart 11: Target inspections pro-rata achieved by Port (Jul-2019)**



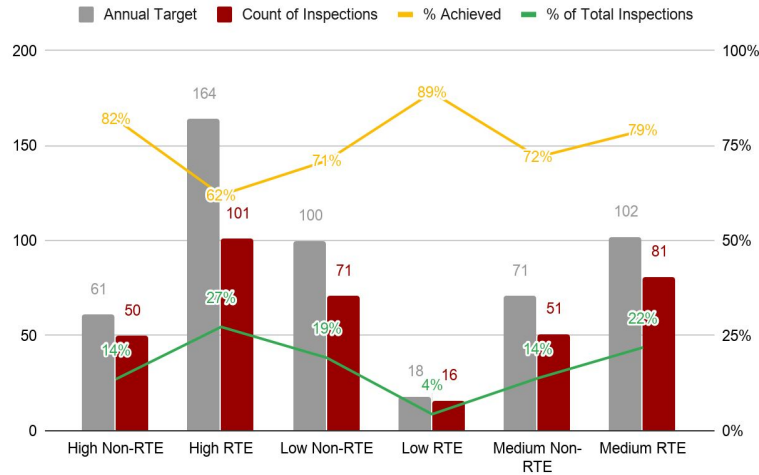
Source: SFPA

## Appendix 5: SFPA key outputs and performance

### Food - target inspections by risk category

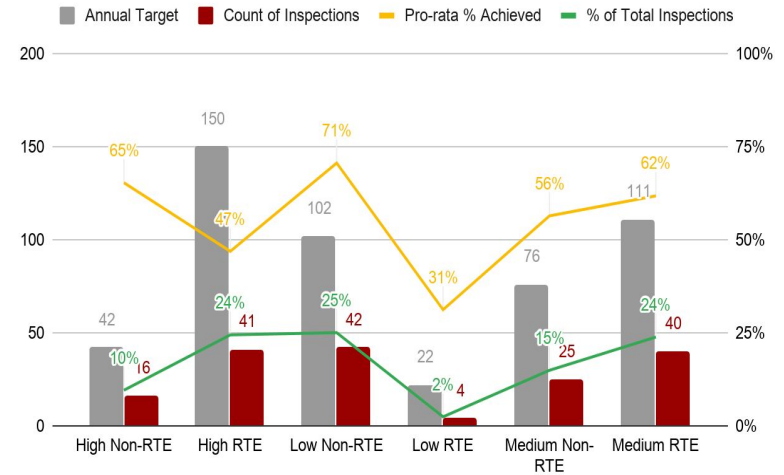
Key food safety data - 34% of inspections are in the high risk category in 2019 (YTD July). Targets were missed in all cases in 2018. In the case of high ready-to-eat (RTE) the % of target achieved was 62%. The SFPA is also behind on its target in all risk categories in 2019. Data for earlier years not provided. Only one category has recorded meeting more than 70% of its (pro rata year to date) target (Low Non-RTE). High and medium risk categories have achieved a range of 47% to 65% of pro rata year to date) targets.

**Chart 12: Target inspections achieved by risk category (FY 2018)**



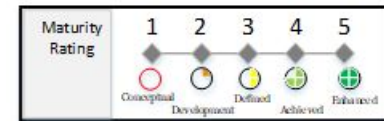
Source: SFPA

**Chart 13: Target inspections pro-rata achieved by risk category (Jul-2019)**



Source: SFPA





## Appendix 6: IT capability assessment heat map

The heatmap below represents the combined output of a detailed questionnaire which underpins the IT Capability Framework. This heatmap was created by consolidating the responses to the questionnaire which was discussed during interviews with members of the SFPA IT department. The heatmap represents the level of maturity (1 low - 5 high) with the individual scores marked against each capability.

Figure 9: Assessment of the SFPA’s IT capabilities



## Appendix 7: Communication channels

Format	Frequency	Group	Purpose
Board Meeting / Senior Management Team Meeting / National Operations Meeting (NOMs) / Port Office / Unit Meeting	Fortnightly	Chair / Authority, Director of Ops & Nat Directors / Board, Director of Ops & National Directors & SPOs / SPO/ Unit Manager, SFPOs and clerical staff	Updates on key activities
Joint Management Team Meeting (JMT)	Quarterly	Board, Director of Operations, National Directors & SPOs	Updates on key activities
SFPA weekly meeting (recorded and emailed)	Weekly (Monday)	Executive Authority, Audit & Risk Committee, Accounting Officer, Leadership Team, Operations, SPOs	All ports and divisions provide updates on key activities and meetings and details on future events. This meeting is recorded and emailed so that it is available to those who cannot attend due to rosters or other commitments.
Informal meetings	Day to day basis	All employees	Internal communications and providing and receiving feedback
Intranet / Message board	Every 3 months	All employees	Source of information, message board for employees to share ideas / questions
E-mail	Daily	All employees	General Communications.
Memos / Video and Tele Conferencing	Ad hoc	All employees	Issued when major developments occur
Phone / Short Message Service (SMS)	Irregular	SFPOs	Alert SFPOs to 'Hails' from fishing vessels intending to land/enter port
Staff Newsletter (Fish Sceals)	Not specified	All employees	General updates
Website	Ongoing	Public	Promote and inform the public on the SFPA through written and video content e.g 'A day in the life' video
Seafest	Annual	Public	Promote the SFPA
Press Releases / Features and interviews with national, regional and trade media	Regular	Public	Communicate Annual work outputs / SFPA industry and regulatory events / Recruitment / Enforcement successes / Food safety / Recreational fishing / Seasonal Inshore patrols programme
SFPA leaflets and corporate publications	Regular	Public	Range of topics including the Landing Obligation; Weighing and an introduction to the SFPA
Art wall project in Dunmore East	Ongoing	Public	Community Engagement
Shoal / Communications Champions	Quarterly	Staff committee from across all locations, grades and functions in the Authority, with the Chairperson of the SFPA as Chairperson.	Improve communication in the SFPA by developing communication initiatives to assist staff in fulfilling strategic objectives - covers communications, health & wellness, corporate social responsibility and environmental management and sustainability.

## Appendix 8: Understanding the levers and re-enforcers of cultural change

PwC has developed a model of levers and re-enforcers for cultural change as shown below. Re-enforcers of cultural change are used to drive the required lever change.

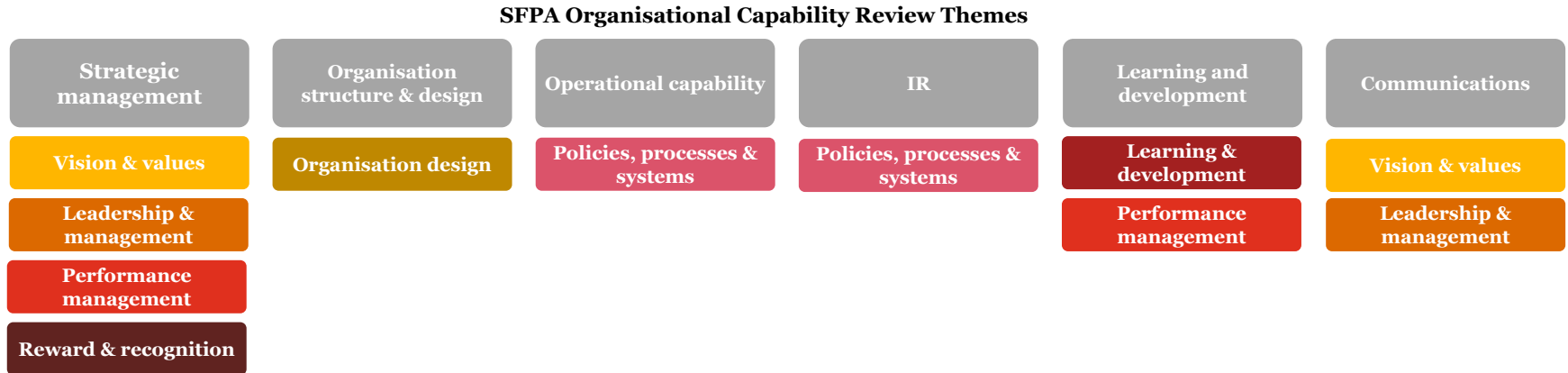
**Figure 10: PwC model of cultural change**



## Appendix 8: Understanding the levers and re-enforcers of cultural change

As shown below, the 6 themes in this review are, or can be mapped directly to these, levers of cultural change.

**Figure 11: Mapping of SFPA Organisational Capability Review Themes to PwC’s levers of cultural change**



## Appendix 9: Abbreviation Glossary

Abbreviation	Definition
ABP	Animal by-product
AIS	Automatic Identification Systems
BIM	Bórd Iascaigh Mhara
CEO	Chief Executive Officer
CFP	Common Fisheries Policy
COP	Code of Practice
CSSO	Chief State Solicitor's Office
DAFM	Department of Agriculture, Food and the Marine
DG MARE	Directorate General for Maritime Affairs and Fisheries
DG SANTE	Directorate General for Health and Food Safety
DoD	Department of Defence
DPP	Director of Public Prosecutions
EFCA	European Fisheries Control Agency
EMFF	European Maritime and Fisheries Fund
ERS	Electronic Recording & Reporting System
EU	European Union
FBO	Food Business Operator
FSAI	Food Safety Authority of Ireland

Abbreviation	Definition
FTE	Full-Time Equivalents
HR	Human Resource
IFI	Inland Fisheries Ireland
IFIS	Integrated Fisheries Information System
IMT	Information Management and Technology
IR	Industrial Relations
IT	Information Technology
JC	Joint Council
JMT	Joint Management Team
Kg	Kilogram
KPI	Key Performance Indicator
L&D	Learning & development
LMS	Learning Management System
NOM	National Operations Meeting
OAPI	Official Agencies Premises and Inspections
OC	Operational Capability
OSD	Organisational Structure and Design
PAS	Public Appointments Service

Abbreviation	Definition
PMDS	Performance Management and Development System
PMO	Project Management Office
PNO	Prior Notification to Land
QA	Quality Assurance
QMS	Quality Management System
RACI	Responsible, Accountable, Consulted, and Informed
RTE	Ready-To-Eat
SFPA	Sea-Fisheries Protection Authority
SFPO	Sea Fisheries Protection Officer
SLA	Service Level Agreement
SMS	Short Message Service
SMT	Senior Management Team
SOP	Standard Operating Procedure
SPO	Senior Port Officer
TNA	Training Needs Analysis
WRC	Workplace Relations Commission
YTD	Year To Date